

**PERIODIC STRUCTURAL STABILITY ASSESSMENT**  
**391-3-4-.10(4) and 40 C.F.R. Part 257.73**  
**PLANT YATES ASH POND B' (AP-B')**  
**GEORGIA POWER COMPANY**

The Federal CCR Rule, and, for Existing Surface Impoundments where applicable, the Georgia CCR Rule (391-3-4-.10) require the owner or operator of an existing CCR surface impoundment to conduct initial and periodic structural stability assessments. The owner or operator must conduct an assessment of the CCR unit and document whether the design, construction, operation and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein. *See* 40 C.F.R. § 257.73(d); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)<sup>1</sup>. In addition, the Rules require a subsequent assessment be performed within 5 years of the previous assessment. *See* 40 C.F.R. § 257.73(f)(3); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)<sup>1</sup>.

The CCR surface impoundment known as Plant Yates AP-B' is located on Plant Yates property, northwest of Newnan, Georgia. The Notification of Intent to Initiate Closure was placed in the Operating Record on 04/20/2018 and closure has been designed to have no negative impacts on the stability of the embankment. AP-B' is currently dewatered and contains only CCR and occasional stormwater runoff that is not impounded.

AP-B' was originally formed by an engineered cross-valley embankment. The foundations generally consist of silty sand with gravel, silty sand, partially weathered rock and a localized area of soft clayey sand with organics.

The embankment has grassy vegetation on the exterior dike slopes. Much of the vegetation on the interior of the dike has been removed as part of the closure construction. Wave action on interior dike slopes is not a concern at AP-B' since the impoundment has been substantially dewatered and no longer stores water. Due to the absence of free water, AP-B' is not subjected to rapid drawdown conditions.

The cross-valley embankment was properly constructed using mechanical stabilization and compacted to a density sufficient to withstand the range of loading conditions.

<sup>[1]</sup> In a typographical error, 391.3-4.10(4)(b) references the "structural integrity criteria in 40 CFR 247.73," when the reference to such criteria should be 40 CFR 257.73.

Vegetated slopes of the dike that remain visible are properly maintained to a manageable height to allow for routine inspection.

The primary spillway was originally an open-channel earthen ditch designed, constructed, operated and maintained to adequately manage flow during and following the peak discharge from a 100-year, 24-hour storm. However, the CCR unit is currently undergoing closure, has been dewatered and no longer has the ability to impound water. Stormwater is currently directed to a nearby temporary construction sedimentation pond. Due to the dewatering activities and inability of the CCR unit to impound water, an updated periodic inflow design study is not applicable.

The downstream slopes of the embankment are not subject to inundation from adjacent water bodies.

I hereby certify that the structural stability assessment was conducted in accordance with 40 C.F.R. § 257.73 (d).



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