PERIODIC SAFETY FACTOR ASSESSMENT
391-3-4-.10(4) and 40 C.F.R. § 257.73
PLANT YATES ASH POND B (AP-B)
GEORGIA POWER COMPANY

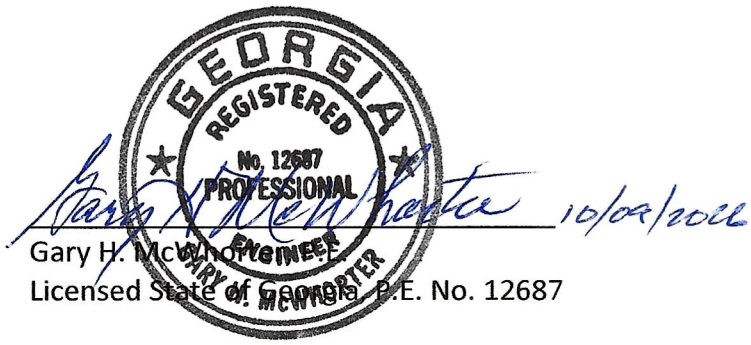
The Federal CCR Rule, and, for Existing Surface Impoundments where applicable, the Georgia CCR Rule (391-3-4-.10) require the owner or operator of a CCR surface impoundment to conduct initial and periodic safety factor assessments. *See* 40 C.F.R. § 257.73(e); Ga. Comp. R. & Regs. r. 391-3-4-.10(4)(b). The owner or operator must conduct an assessment of the CCR unit and document that the minimum safety factors outlined in 40 C.F.R. § 257.73(e)(1)(i) through (iv) for the critical embankment section are achieved. In addition, the Rules require a subsequent assessment be performed within 5 years of the completion of the previous assessment. *See* 40 C.F.R. § 257.73(f)(3); Ga. Comp. R. & Regs. r. 391-3-4-.10(4)(b) . The previous Periodic Potential Hazard Potential Classification Assessment was placed in the Operating Record on October 15, 2021.

Plant Yates was once a seven-unit, coal-fired, power generation facility. Plant Yates ceased burning coal in 2015, and Units 1-5 were subsequently dismantled and Units 6 and 7 converted to natural gas. Decommissioning was completed in 2018. The former CCR surface impoundment known as AP-B is located on Plant Yates property, northwest of Newnan, Georgia. CCR from AP-B has been removed and placed within the consolidated footprint of the Ash Management Area (AMA), which is in the process of obtaining a solid waste permit under the Georgia Rules for Solid Waste Management, r. 391-3-4-.10.

The Notification of Intent to Initiate Closure of AP-B by removal of CCR in accordance with 40 C.F.R. § 257.102(c) was placed in the Operating Record on April 20, 2018. CCR has been removed from AP-B and placed in the limits of waste for the consolidated AMA CCR footprint. The AP-B dam was breached during closure activities and AP-B backfilled and graded to promote positive drainage. The CCR Removal Certification Report was submitted to the Georgia EPD, and EPD's acknowledgement of CCR removal was received on May 6, 2024.

Since CCR removal has been acknowledged by the Georgia EPD, the previous impounding structure was breached, and AP-B was backfilled and graded to promote positive drainage. With the placement of the AMA final cover system, AP-B cannot impound water; therefore, AP-B no longer functions as a CCR surface impoundment. Hence, the load cases stipulated in 40 C.F.R. § 257.73(e)(1) (maximum storage pool and maximum surcharge pool) are no longer applicable or relevant, and therefore, the safety factor assessment requirement is considered satisfied.

I hereby certify that the safety factor assessment was conducted in accordance with 40 C.F.R. § 257.73(e)(1).



10/04/2022

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