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 CCR surface impoundment known as Plant Yates AP-B' is located on Plant Yates property, northwest of Newnan, Georgia. AP-B' has been consolidated within the Ash Management Area (AMA) CCR footprint which is in the process of obtaining a solid waste permit under the Georgia Rules for Solid Waste Management, r. 391-3-4-.10.

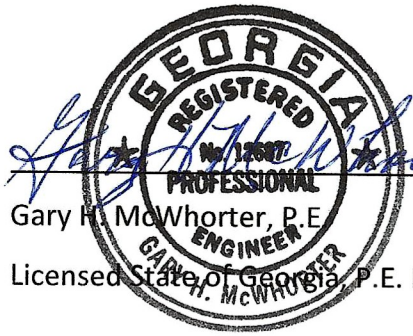
The Notification of Intent to Initiate Closure of AP-B' in accordance with 40 C.F.R. § 257.102(d), closure in place, was placed in the Operating Record on April 20, 2018, and closure has been designed to have no negative impact on the stability of the dam. AP-B' has completed closure and no longer impounds water. During closure activities, CCR was removed along a 400-foot section of the crest and downstream slope of the AP-B' dam for construction of the AMA

Perimeter Access Road. The excavated CCR was placed in the consolidated AMA CCR footprint. CCR removal, inspection, and verification of removal from the AP-B' dam was accomplished during AP-B CCR removal and was included in the AP-B CCR Removal Certification Report submitted to the Georgia EPD. The Georgia EPD's acknowledgement of CCR removal was received on May 6, 2024. Compacted structural fill was placed on the remaining earthen portion of the AP-B' dam as part of the construction of the AMA Perimeter Access Road. The consolidated AMA CCR footprint was graded and a final cover system constructed with conveyance structures to promote positive stormwater drainage and to control, minimize, or eliminate infiltration of liquids and releases of CCR. The AMA Closure Certification Report was submitted to the Georgia EPD on June 8, 2026.

With the final cover system in place, AP-B' cannot impound water and 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.

The AP-B' dam is constructed of compacted clayey sands that are not susceptible to liquefaction. Therefore, a minimum liquefaction safety factor determination was not required.

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



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