PERIODIC SAFETY FACTOR ASSESSMENT
391-3-4-.10(4) and 40 C.F.R. § 257.73
PLANT YATES ASH POND 2 (AP-2)
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 Safety Factor Assessment was placed in the Operating Record on October 15, 2021.

The former CCR surface impoundment known as Plant Yates AP-2 was located on Plant Yates property, northwest of Newnan, Georgia. 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. A Notification of Intent to Initiate Closure for AP-2 was placed in the Operating Record on April 17, 2019. AP-2 has undergone CCR removal in accordance with 40 C.F.R. § 257.102(c). CCR removal occurred in three phases, designated AMAX Cove, AP-2 West, and AP-2 East. CCR Removal Certifications were submitted January 25, 2021, for AMAX Cove, June 9, 2021, for AP-2 West, and November 17, 2023, for AP-2 East demonstrating the completion of CCR removal activities for Yates AP-2. Removal was acknowledged complete in correspondence from Georgia EPD dated March 16, 2021, for AMAX Cove, June 24, 2021, for AP-2 West, and February 19, 2024, for AP-2 East.

Since CCR removal activities have been completed and documented, the former AP-2 no longer functions as a CCR surface impoundment in that it does not receive or store CCR. Hence, the

requirements of 40 C.F.R. § 257.73 are not applicable or relevant to the former AP-2 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).



10/09/2020

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