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

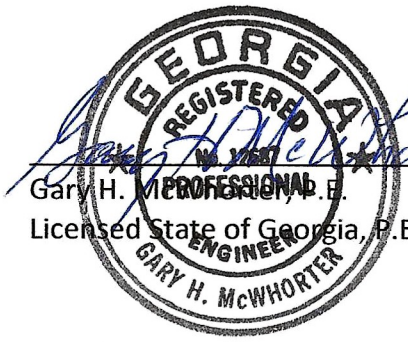
Plant Yates was once a seven-unit, coal-fired, power generation facility. Plant Yates ceased burning coal in 2015, and Units 1-5 were subsequently dismantled and Units 6 and 7 converted to natural gas. Decommissioning was completed in 2018. The former CCR surface impoundment known as AP-3 is located on Plant Yates property, northwest of Newnan, Georgia. AP-3 has been consolidated within 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-3 under 40 C.F.R. §§ 257.102(c) and (d) was placed in the Operating Record on April 20, 2018. The closure has been designed to have no negative impacts on the stability of the dam. For AP-3, CCR that remained outside the Limits of Waste of the consolidated AMA CCR footprint (AMA perimeter road, east cove, and south cove areas) was removed and placed in the consolidated AMA CCR footprint in accordance with 40 C.F.R. § 257.102(c). The Perimeter Road, East & South Coves CCR Removal Certification Report was submitted to the Georgia EPD, and the Georgia EPD's acknowledgement of CCR removal

was received on March 16, 2021. The AP-3 dam remained in place and was incorporated into 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-3 cannot impound water. 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 embankment of AP-3 is constructed of compacted silts and silty 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).



10/09/2026

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