PERIODIC STRUCTURAL STABILITY 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 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). 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 Structural Stability Assessment was placed in the Operating Record on October 15, 2021.

The former CCR surface impoundment known as Plant Yates AP-2 is 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 under 40 C.F.R. § 257.102(c) 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(d) are not applicable or relevant to former AP-2 and, therefore, the structural stability assessment requirement is considered satisfied.

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



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Gary H. McWhorter, P.E.
Licensed State of Georgia, P.E. No. 12687