

**PERIODIC STRUCTURAL STABILITY ASSESSMENT**  
**391-3-4-.10(4) and 40 C.F.R. Part 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 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)<sup>1</sup>. In addition, the Rules require a subsequent assessment be performed within 5 years of the previous assessment. *See* 40 C.F.R. § 257.73(f)(3); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b)<sup>1</sup>.

The CCR surface impoundment known as Plant Yates AP-3 is located on Plant Yates property, northwest of Newnan, Georgia. The Notification of Intent to Initiate Closure was placed in the Operating Record on 04/20/2018 and closure has been designed to have no negative impacts on the stability of the embankment. AP-3 is currently dewatered and contains only CCR and occasional stormwater runoff that is not impounded.

AP-3 was originally formed by an engineered cross-valley embankment. The foundation soils are generally firm to very dense silty fine to coarse sand and saprolite.

The embankment has grassy vegetation on the exterior dike slopes. Much of the vegetation on the interior slopes has been removed as a part of closure construction. Wave action on interior dike slopes is not a concern at AP-3 since the unit no longer impounds water. Due to the absence of free water, AP-3 is no longer subject to rapid drawdown conditions.

The cross-valley embankment has been properly constructed using mechanical stabilization and compacted to a density sufficient to withstand the range of loading conditions.

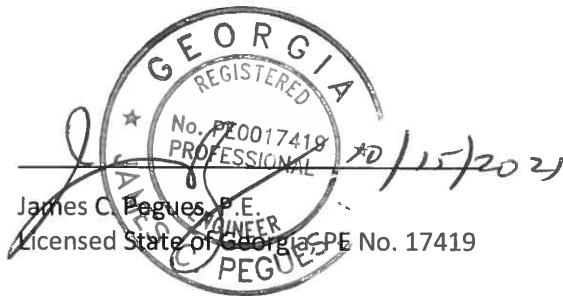
<sup>[1]</sup> In a typographical error, 391.3-4.10(4)(b) references the “structural integrity criteria in 40 CFR 247.73,” when the reference to such criteria should be 40 CFR 257.73.

Vegetated slopes of the dike are properly maintained to a manageable height to allow for routine inspection.

The CCR unit's original primary discharge structure was a 48-inch diameter corrugated metal standpipe with a metal trash rack that was connected to a 42-inch diameter corrugated metal discharge pipe. This primary discharge structure has been properly abandoned as a part of closure construction since the impoundment has been dewatered. The primary discharge structure was originally supplemented by an auxiliary spillway consisting of a grass-lined ditch that drains to the same ditch that receives flow from the primary discharge structure. This auxiliary spillway has also been abandoned as a part of closure construction. Due to the dewatering activities and inability of the CCR unit to impound water, an updated periodic inflow design study is not applicable. Run-on from adjoining properties to AP-3 has been diverted around the unit.

The downstream slopes of the embankment are not subject to inundation from adjacent water bodies.

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

A circular professional seal for James C. Pegues, P.E., a Registered Professional Engineer in the State of Georgia. The seal contains the text "GEORGIA REGISTERED PROFESSIONAL ENGINEER PEGUES" and "No. 17419". A handwritten signature and the date "10/15/2021" are written over the seal. Below the seal, the text "James C. Pegues, P.E. Licensed State of Georgia, PE No. 17419" is printed.

James C. Pegues, P.E.  
Licensed State of Georgia, PE No. 17419