

**PERIODIC INITIAL SAFETY FACTOR ASSESSMENT**  
**391-3-4-.10(4) AND 40 C.F.R. PART 257.73(e)**  
**PLANT YATES ASH POND 1 (AP-1)**  
**GEORGIA POWER COMPANY**

The Federal CCR Rule and 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)<sup>1</sup>. A direct final rule revision to a partial vacatur of the Final Rule became effective on October 4, 2016. This revision eliminated the exemption for inactive CCR surface impoundments and required such units to meet the same requirements as existing CCR surface impoundments. 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 previous assessment. *See* 40 C.F.R. § 257.73(f)(3); Ga. Comp. R. & Regs. r. 391.3-4-.10(4)(b) 1.

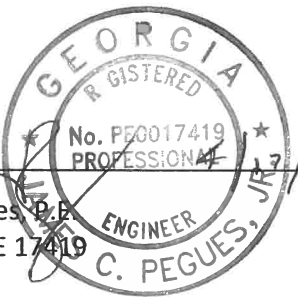
The CCR surface impoundment known as Plant Yates AP-1 is located in Coweta County, Georgia, approximately 5 miles northwest of Newnan, on Plant Yates property. AP-1 has undergone CCR removal in accordance with 40 C.F.R. § 257.102(c). Georgia Power submitted a certification of removal report to the Georgia Environmental Protection Division on November 25, 2019, demonstrating completion of CCR removal activities for AP-1. Based on review of the report and an inspection of AP-1 on October 15, 2020, EPD acknowledged completion of CCR removal on November 3, 2020. Also, the facility no longer impounds water on a regular basis. Although the embankment for AP-1 remains, a new discharge outlet for the CCR unit was installed as a part of the closure by removal construction and only temporary storage of a limited amount of non-contact storm water now takes place.

As AP-1 is no longer designed to, nor has the ability to, impound water, factor of safety analyses for long term maximum storage pool (static) and maximum surcharge pool (static) can no longer be performed. Furthermore, as there is no CCR stored in the facility, stability analyses for seismic loading conditions need not be performed under the requirements of 40 C.F.R. § 257.73(e).

<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.

The embankment is constructed of stiff to very stiff clays that are not susceptible to liquefaction. Therefore, a minimum liquefaction safety factor determination was not required.

I hereby certify that the documentation above is accurate based on current available information and that safety factor assessments conducted in accordance with 40 C.F.R. § 257.73 (e)(1) are not warranted under the requirements of the rule.

A circular professional seal for the State of Georgia. The outer ring contains the text "GEORGIA REGISTERED PROFESSIONAL ENGINEER". The inner circle contains the text "No. PE0017419" and "PROFESSIONAL ENGINEER". The name "JAMES C. PEGUES, JR." is written around the bottom inner edge of the seal. A handwritten signature "James C. Pegues, P.E." is written across the seal. To the right of the seal, the date "1/23" is handwritten.

James C. Pegues, P.E.  
Licensed GA PE 17419