

**INITIAL SAFETY FACTOR ASSESSMENT**  
**40 C.F.R. PART 257.73**  
**PLANT YATES ASH POND B (AP-B)**  
**GEORGIA POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 and Part 261), §257.73(e), requires the owner or operator of an existing CCR surface impoundment to conduct an initial and periodic safety factor assessments. The owner or operator of the CCR unit must conduct an assessment and document whether the minimum safety factors outlined in §257.73(e)(1)(i) through (iv) for the critical section of the embankment are achieved.

The CCR surface impoundment known as Plant Yates AP-B is located on Plant Yates property, northwest from Newnan, Georgia. AP-B is formed by an engineered cross-valley embankment and is full of ash. In addition, the area downstream of the dike has also been filled in, effectively eliminating the configuration of the original dike structure, leaving only about 10 feet of embankment protruding above the ground surface. Several breaches have been constructed in the dike protrusion, and the dike remnants are not capable of retaining water. Failure of the dike remnants would not result in a release of ash. AP-B was not given a hazard rating by the EPA during evaluation in 2010 because it was "assessed as 'less than low hazard' due to grading activities that, over the years, backfilled over a majority of the embankment, rendering it essentially indiscernible from the surroundings." Because there are no viable sections to evaluate, a slope stability analysis was not performed.

I hereby certify that the safety factor assessment was conducted in accordance with 40 C.F.R. Part 257.73 (e)(1).

James C. Pegues, P.E.

Licensed State of Georgia, PE No.

