

INITIAL STRUCTURAL STABILITY ASSESSMENT
40 C.F.R. Part 257.73
PLANT YATES ASH POND 3 (AP-3)
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(d), requires the owner or operator of an existing CCR surface impoundment to conduct an 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.

The CCR surface impoundment known as Plant Yates AP-3 is located northwest of Newnan, Georgia, on Plant Yates property. AP-3 is formed by an engineered cross-valley embankment. The foundation soils are generally firm to very dense silty fine to coarse sand and saprolite.

Slope protection against surface erosion consists of grassy vegetation on the interior and exterior dike slopes. Wave action on interior dike slopes is not a concern at AP-3 due to the characteristics of the impoundment. AP-3 is not operated in such a manner as to normally be subjected to rapid drawdown conditions, but the grassy vegetation present provides protection against potential rapid drawdown erosion.

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

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

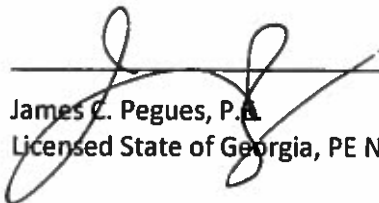
The CCR unit's primary discharge structure is a 48-inch diameter corrugated metal standpipe with a metal trash rack that is connected to a 42-inch diameter corrugated metal discharge pipe. The outlet of the discharge structure is located well beyond the toe of the downstream embankment and discharges to a drainage ditch that ultimately directs the flow to AP-2. The primary discharge structure is 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. The inflow design flood study indicates current configuration of the discharge and spillway structures does not allow AP-3 the sufficient spillway/storage capacity following the peak discharge from a 100-year, 24-hour storm when analyzed under normal (and historic) operating conditions. However, the water level in AP-3 has been lowered significantly over the past few weeks to assist with vegetation control and removal. This lowering of the water level has increased available storage capacity such that overtopping is less of a concern. This lower water will be maintained until pond closure. Furthermore, construction of diversion ditches and temporary holding ponds to manage run-on from adjoining properties to AP-3 is scheduled to begin in the 4th quarter of 2016, thereby reducing the inflow from adjoining property into AP-3.

The primary discharge pipe passes under the embankment. There is currently no evidence of deterioration, deformation, distortion, bedding deficiencies, sedimentation, and debris which may negatively affect the operation of the structure.

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. Part 257.73 (d).


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