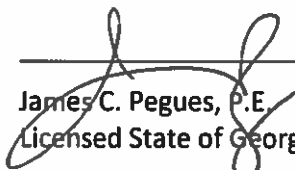



**INITIAL STRUCTURAL STABILITY ASSESSMENT**  
**40 C.F.R. Part 257.73**  
**PLANT YATES ASH POND B (AP-B)**  
**GEORGIA POWER COMPANY**

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 C.F.R. Part 257 and Part 261), §257.73(d), requires 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.

The CCR surface impoundment known as Plant Yates AP-B is located northwest of Newnan, Georgia, on Plant Yates property. AP-B was originally formed by an engineered cross-valley embankment and has been filled with ash over the life of its operation. 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 constructed breaches have been made in the remaining visible dike structure, and the dike remnants are not capable of retaining water. It should be noted that AP-B was not assigned a hazard rating by the EPA during its 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."

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

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



The seal is circular with "GEORGIA" at the top and "REGISTERED PROFESSIONAL ENGINEER" around the inner border. The name "JAMES C. PEQUES, JR." is written across the bottom. The license number "17419" is stamped in the center.