Georgia Power

Environmental Affairs
241 Ralph McGill Blvd, NE
Atlanta, Georgia 30308-3374

December 30, 2022
ELECTRONIC MAIL

Ms. Stacey Wix
Georgia Environmental Protection Division
Mountain District Office
16 Center Road
Cartersville, Georgia 30120

Re: NPDES Permit No. GA0001449 – Plant Bowen
ELG Progress Report

Dear Ms. Wix:

In accordance with Part III.C.7.g. of the above referenced permit, Georgia Power is submitting the December 2022 progress report for compliance with the Effluent Limitations and Guidelines for Steam Electric Generating Facilities.

If you have any questions or require additional information, please contact Erika Fly at 404-506-7031 or ekyeager@southernco.com.

Sincerely,

Dominic Weatherill
Water Programs Supervisor

Cc: Whitney Fenwick

Georgia Power

Plant Bowen – NPDES Permit No. GA0001449

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Summary

Georgia Power Company ("the Company") Plant Bowen remains on track to meet the Flue Gas Desulfurization Wastewater ("FGDW") compliance deadlines in the 2020 Effluent Limitations Guidelines ("ELG") Rule, and the National Pollutant Discharge Elimination System (NPDES) permit, by no later than December 31, 2025.

The Company's ELG compliance strategy for Plant Bowen continues to incorporate the Integrated Resource Planning ("IRP") process with the Georgia Public Service Commission ("PSC"), while also acknowledging the on-going regulatory uncertainty resulting from the U.S Environmental Protection Agency's ("EPA's") rule reconsideration.

This report summarizes progress at Plant Bowen in meeting the E*ffluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category* for FGDW. The report describes early steps completed to meet the generally applicable effluent limits for FGDW provided in 40 C.F.R. § 423.13(g)(1)(i); and information regarding the subcategory for Permanent Cessation of Coal Combustion as provided in 40 C.F.R. § 423.13(g)(2)(i).

Units 1 and 2

On October 13, 2021, pursuant to 40 C.F.R. § 423.19(f) Georgia Power submitted to EPD a Notice of Planned Participation (NOPP) for Units 1 and 2 at Plant Bowen. The NOPP informed EPD of Georgia Power's intent to permanently cease coal combustion for Units 1 and 2 by no later than December 31, 2028 and are therefore eligible for the alternative limits at 40 C.F.R. § 423.13(g)(2)(i). However, as reported to EPD on August 3, 2022, the PSC ordered that Plant Bowen Units 1 and 2 not be retired as part of the 2022 IRP, but rather the decision for decertification and retirement be reassessed as part of the 2025 IRP. However, the PSC decision does not impact the FGDW compliance strategy for Plant Bowen, as the FGDW system is a common environmental control for all four generating units. No further updates have occurred for Units 1 and 2, since the previous progress report.

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Units 3 and 4

The Company provided EPD with an updated FGDW project schedule in the August 2022 progress report, and that schedule remains unchanged and is provided below as Figure 1. Plant Bowen continues to pursue compliance with the FGDW permit limits by no later than December 31, 2025, with plans to expand the current physical-chemical treatment system for arsenic and mercury treatment, as well as adding the biological treatment systems necessary for meeting the selenium and nitrate-nitrite limits.

Since the last progress report, Plant Bowen has executed a contract with an Engineering Procurement and Construction (EPC) Contractor to carry out the FGDW project at Plant Bowen. The EPC Contractor has thus far supported the conceptual design and front-end planning work and is now in the process of performing the detailed design work as illustrated in line item 8 of the ELG Schedule. The detailed design work encompasses the civil, mechanical, and electrical design work necessary to accomplish the FGDW treatment system project. The current target is to achieve 60% design by Q2 2023, then 90% design by Q3 2023.

Plant Bowen Units 3 and 4 remain on schedule to meet the generally applicable effluent limits as specified in Part I.A.5 of the permit, but Georgia Power remains mindful of regulatory changes potentially impacting coal-fired power plants, including EPA's August 3, 2021, Notice of Rulemaking Initiative for the ELG's. EPA has indicated potential revision of Best Available Technology for FGDW treatment with the revised rule currently being under review by the United States Office of Management and Budget. A publication of the proposed rule is anticipated in 2023, with a final rule being approximately 12 months following. Georgia Power is executing the FGDW project as illustrated in the ELG Schedule, but completion of EPA's rulemaking process warrants careful consideration, as finalization of the rule could justify revisions to the Plant Bowen FDGW compliance strategy at that time.

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Figure 1

