Georgia Power

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

June 30, 2023
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 June 2023 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") March 29, 2023, publication of the Proposed ELG Supplemental Rule. The proposed rule introduces potentially new requirements for FGDW treatment, but also reaffirms the need for "steadfast implementation of the current 2020 rule limitations". *See 88 Fed. Reg. at 18,886.*

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 activities 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

Plant Bowen continues to pursue compliance with the FGDW permit limits by no later than December 31, 2025, pursuing expansion of 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.

The FGDW project is being executed with an Engineering, Procurement, and Construction (EPC) Contractor. The EPC Contractor is currently continuing with detail design, with the 90% design milestone having been achieved in May 2023. The detailed design encompasses the civil, mechanical, and electrical design work necessary to accomplish the FGDW treatment system project. The project now involves overlapping design work, with the necessary procurement, fabrication, and delivery of long lead-time equipment. The schedule provided in Figure 1 below reflects an approximate 4-month advancement of the design and procurement activities. This in turn supports an advancement of construction mobilization, which was initially scheduled for early 2024 but is now planned for Q3 2023. The construction completion date has not materially changed, but the startup and commissioning work is now anticipated being 1-2 months earlier than originally projected.

Plant Bowen Units 3 and 4 remain on schedule to meet the generally applicable effluent limits specified in Part I.A.5 of the permit, but Georgia Power remains mindful of regulatory changes potentially impacting coal-fired power plants, including the March 2023 publication of the Proposed ELG Supplemental Rule. Finalization of the ELG Supplemental Rule is anticipated in early 2024, whereupon the Company will evaluate what, if any, revisions to the Plant Bowen FGDW project are warranted.

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Figure 1

