Georgia Power

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

December 27, 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 December 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
Environmental Affairs Supervisor

Cc: Whitney Fenwick

Georgia Power

Plant Bowen – NPDES Permit No. GA0001449

ELG Progress Report – December 27, 2023

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. In October 2023, the Company filed a 2023 IRP Update in response to extraordinary load growth and an accelerated capacity need beginning in the winter of 2025/2026 – a full three years earlier than projected in the 2022 IRP. With the growth in the Company's projected load forecast and the increase in the magnitude of capacity needs in 2028 and beyond, for planning purposes, the Company assumed a

retirement date at the end of 2035 for Plant Bowen Units 1-2 in the 2023 IRP Update. The Company will submit unit retirement studies related to Plant Bowen Units 1-2 in the 2025 IRP and will make a formal recommendation at that time regarding the retirement or continued operation of these units.

The PSC decision in the 2022 IRP to reassess the timing of decertification of Plant Bowen Units 1-2 in the 2025 IRP does not impact the FGDW compliance strategy for Plant Bowen, as the FGDW system is a common environmental control for all four generating units.

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. As of December 2023, the EPC Contractor has substantially completed detail design. The detailed design encompasses the civil, mechanical, and electrical design work necessary to accomplish the FGDW treatment system project. The project now involves overlapping procurement, fabrication, and delivery of long lead-time equipment. The schedule provided in Figure 1 below reflects a few adjustments since the previous progress reports submitted in June 2023. The updated schedule reflects a slight extension to the timeframe for equipment procurement and delivery, but that does not impact the overall schedule. The schedule also illustrates that construction has commenced with site foundations and preparation being close to completion in early 2024.

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

