Georgia Power

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

October 12, 2023
ELECTRONIC MAIL

Ms. Whitney Fenwick, Manager
Wastewater Regulatory Program
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive S.W., Suite 1152
Atlanta, GA 30334

Re: NPDES Permit No. GA0035564 – Plant Scherer
2023 ELG Annual Progress Report

Dear Ms. Fenwick:

Georgia Power is providing this Annual Progress Report for Plant Scherer, consistent with 40 C.F.R. § 423.19 (f)(3) and the 2020 Steam Electric Effluent Limitations Guidelines. The attached Annual Progress Report provides the status for each generating unit and the associated high-level milestones.

If you need additional information or have questions regarding this matter, please contact Jean Brown at 404-506-6360.

Sincerely,

Dominic Weatherill
Environmental Affairs Supervisor

Cc: Sarita Banjade - EPD

Plant Scherer – NPDES Permit No. GA0035564

ELG Progress Report – October 12, 2023

Summary

Georgia Power Company ("the Company") Plant Scherer remains on track to meet the Flue Gas Desulfurization Wastewater ("FGDW") compliance deadlines in the 2020 Effluent Limitations Guidelines ("ELG") Rule.

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

This report summarizes progress at Plant Scherer 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 Voluntary Incentive Program ("VIP") effluent limits for FGDW provided in 40 C.F.R. § 423.13(g)(3)(i); and information regarding the subcategory for Permanent Cessation of Coal Combustion as provided in 40 C.F.R. § 423.13(g)(2)(i). The details provided herein conform with the annual reporting requirements in 40 C.F.R. § 423.19(f) and 40 C.F.R. § 423.19(h).

Units 3 and 4

On October 13, 2021, pursuant to 40 C.F.R. § 423.19(f) the Company submitted to EPD a Notice of Planned Participation ("NOPP") for Unit 3 and a separate NOPP for Unit 4 at Plant Scherer. The NOPP's informed EPD of the plan to permanently cease coal combustion for Units 3 and 4 by no later than December 31, 2028, and January 31, 2022, respectively, and notified EPD that these units are eligible for the alternative limits at 40 C.F.R. § 423.13(g)(2)(i).

For Unit 3, following the 2022 IRP, the PSC issued a Final Order approving the December 31, 2028, retirement. No updates to this plan have occurred.

For Unit 4, the Company previously notified EPD that Unit 4 was retired by Florida Power & Light on December 31, 2021.

However, and as previously noted, the electric generating status of Units 3 and 4 does not impact the overall FGDW compliance strategy at Plant Scherer as the FGDW system is a common environmental control for all four generating units.

Plant Scherer – NPDES Permit No. GA0035564

ELG Progress Report – October 12, 2023

Units 1 and 2

On October 13, 2021, pursuant to 40 C.F.R. § 423.19(h) the Company submitted a NOPP for Units 1 and 2 informing EPD of the Company's plan to participate in the VIP, and notified EPD that these units are eligible for the alternative limits at 40 C.F.R. § 423.19(g)(3)(i). As required, the NOPP also included an engineering dependency chart ("schedule") that was subsequently updated and provided to EPD as part of the 2022 ELG Progress Report.

The Company continues to work with WesTech as the supporting engineering firm and has since further refined and updated the schedule as provided below. This schedule is subject to further revisions that will be disclosed in future annual progress reports.

The updated schedule reflects the current implementation of the ELG pilot study, which will further inform the technical capabilities for management of the membrane concentrate (brine). The updated schedule also illustrates an approximate 3–5-month extension in each of the major schedule components (engineering, procurement, construction, and commissioning). This revision is in response to delays in contract execution and terms, which is not uncommon for projects of this scale and complexity. The schedule still supports a June 2026 thru June 2027 commissioning period, which is well in advance of the statutory applicability date of 12/31/2028.

The Company continues in its pursuit of a leading-edge and full-scale membrane based FGDW treatment system, afforded by the unique FGDW conditions present at Plant Scherer.

Plant Scherer – FGDW VIP Schedule

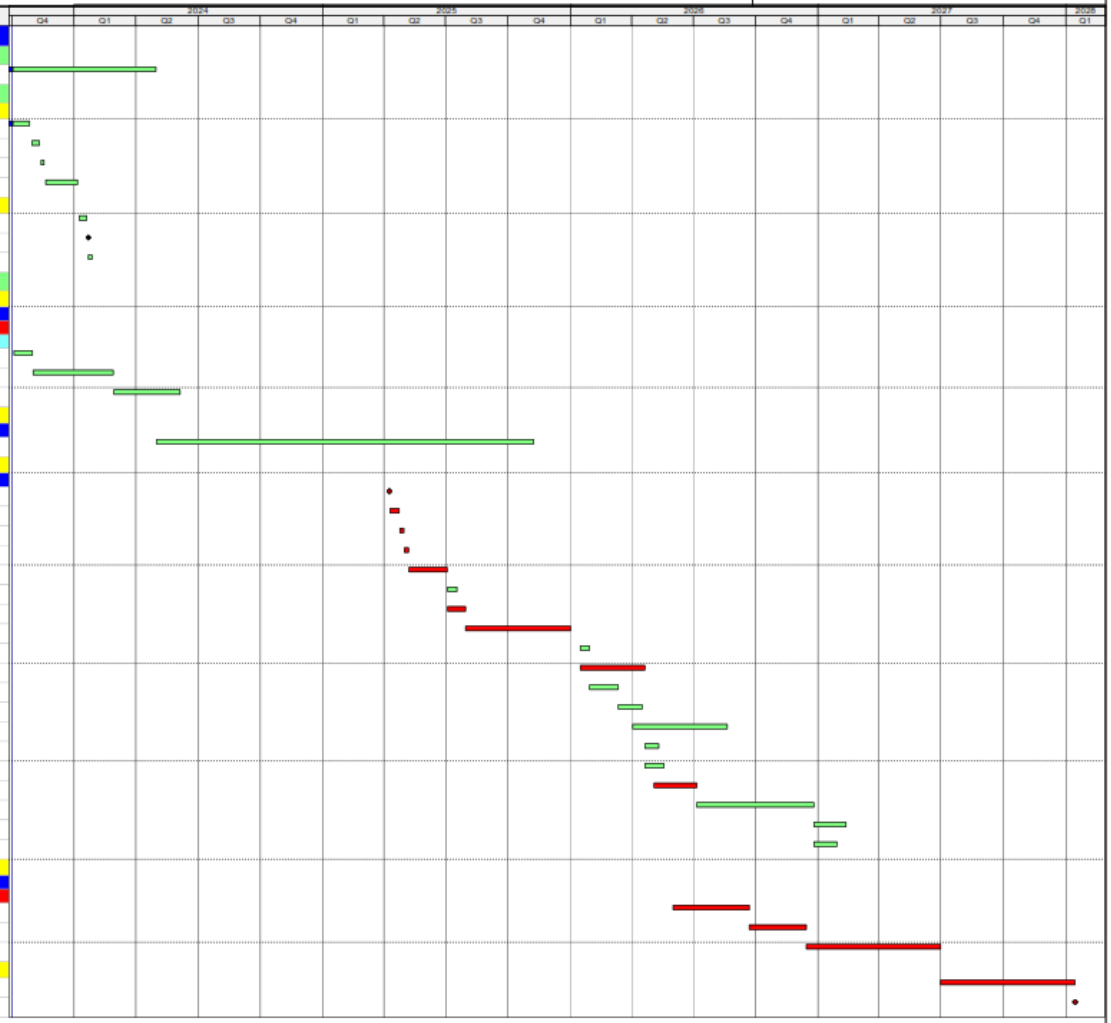
Project Filename: Scherer ELG Water Treatment

Project ID: SCH-ELG-WT

Scherer ELG Water Treatment
Scherer ELG WT - GPC EA

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Activity ID	Activity Name	Remaining Duration	Start	Finish	Expected Finish
Scherer ELG Water Treatment		1103	07-Mar-2023 A	14-Jan-2028	30-Apr-2024
FGDW Rule Modifications		147	07-Mar-2023 A	30-Apr-2024	30-Apr-2024
A1330	FGDW Rule Modification Prediction (Final)	147	07-Mar-2023 A	30-Apr-2024	30-Apr-2024
ELG Pilot Study		80	25-Sep-2023 A	26-Jan-2024	27-Oct-2023
Test Plan		65	25-Sep-2023 A	05-Jan-2024	27-Oct-2023
TP1020	Avara Brine Study	20	25-Sep-2023 A	27-Oct-2023	27-Oct-2023
TP1040	2 Weeks Continuous Avara Operation	10	30-Oct-2023	10-Nov-2023	
TP1050	Brine Production	5	13-Nov-2023	17-Nov-2023	
TP1060	Aged Brine Study	30	20-Nov-2023	05-Jan-2024	
Test Results and Final Reports		15	08-Jan-2024	26-Jan-2024	
TR2000	WesTech Develop & Evaluate Pilot Study Reports	10	08-Jan-2024	19-Jan-2024	
TR2010	WesTech Submit Pilot Study Reports to SCS	0	22-Jan-2024		
TR2020	SCS Review Pilot Study Reports	5	22-Jan-2024	26-Jan-2024	
ELG Water Treatment Project		1101	04-Oct-2023	14-Jan-2028	
Engineering		170	04-Oct-2023	04-Jun-2024	
Westech		170	04-Oct-2023	04-Jun-2024	
WesTech PO		170	04-Oct-2023	04-Jun-2024	
WesTech Engineering		170	04-Oct-2023	04-Jun-2024	
A1020	Scope Development - WesTech	20	04-Oct-2023	31-Oct-2023	
A1030	Project Definition - WesTech	80	01-Nov-2023	27-Feb-2024	
A1050	Detailed Design - WesTech	70	28-Feb-2024	04-Jun-2024	
Procurement		392	01-May-2024	07-Nov-2025	
WesTech Procurement		392	01-May-2024	07-Nov-2025	
A1110	Equipment Procurement	392	01-May-2024	07-Nov-2025	
CONSTRUCTION		475	09-Apr-2025	11-Feb-2027	
ELG Water Treatment System		475	09-Apr-2025	11-Feb-2027	
A1485	Mobilization Complete	0		09-Apr-2025	
A1140	Install Erosion Control Measures	10	10-Apr-2025	23-Apr-2025	
A1150	Install Site Grading	5	24-Apr-2025	30-Apr-2025	
A1170	Establish Laydown & Trailer Access	5	01-May-2025	07-May-2025	
A1160	Excavation for Foundations	41	08-May-2025	03-Jul-2025	
A1180	Install Underground Utilities	10	04-Jul-2025	17-Jul-2025	
A1190	Install Grounding	19	04-Jul-2025	30-Jul-2025	
A1200	Form/Set Rebar/Place Concrete	105	30-Jul-2025	01-Jan-2026	
A1210	Backfill and Final Grade	10	15-Jan-2026	29-Jan-2026	
A1240	Erect PEMB & OH Gantry Crane System	67	15-Jan-2026	20-Apr-2026	
A1220	Concrete Floor & Curb Coating - Chemcial Area & Equipment Pads	30	29-Jan-2026	12-Mar-2026	
A1280	Install Electrical Equipment	25	12-Mar-2026	16-Apr-2026	
A1290	Install Raceways, Wiring, & Misc Systems	100	02-Apr-2026	20-Aug-2026	
A1250	Install Asphalt Roadway & Paved Areas	15	20-Apr-2026	11-May-2026	
A1260	Interior Offices and Finishes	20	20-Apr-2026	18-May-2026	
A1270	Set Process Equipment	45	04-May-2026	06-Jul-2026	
A1300	Install Interconnecting Piping	124	06-Jul-2026	25-Dec-2026	
A1230	Concrete Floor & Curb Coating - Final Coat Balance of Plant Area	34	25-Dec-2026	11-Feb-2027	
A1310	Test Piping	24	25-Dec-2026	28-Jan-2027	
Startup & Commissioning		282	01-Jun-2026	30-Jun-2027	
ELG Water Treatment System including BOP		282	01-Jun-2026	30-Jun-2027	
ELG Water Treatment System including BOP Commissioning		282	01-Jun-2026	30-Jun-2027	
A1440	Functional Testing	80	01-Jun-2026	21-Sep-2026	
A1450	System Testing	60	21-Sep-2026	14-Dec-2026	
A1460	Operational Testing	142	14-Dec-2026	30-Jun-2027	
Project Closeout		142	30-Jun-2027	14-Jan-2028	
A1480	Project Closeout	142	30-Jun-2027	14-Jan-2028	
A1470	ELG Water Treatment Project Complete	0		14-Jan-2028	



Remaining LOE
Actual LOE
Actual Work
Remaining Work
Critical Remaining Work
Milestone
Critical Milestone

Scherer ELG WT - GPC EA

Southern Company