Georgia Power

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

October 11, 2024
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
2024 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 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

Georgia Power

Plant Scherer – NPDES Permit No. GA0035564

ELG Progress Report – October 11, 2024

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 U.S Environmental Protection Agency's ("EPA's") finalization of the ELG Supplemental Rule in May 2024.

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 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(h) and 40 C.F.R. § 423.19(f).

Units 3 and 4

On October 13, 2021, pursuant to 40 C.F.R. § 423.19(f) the Company submitted to the Environmental Protection Division ("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).

In the 2022 IRP Final Order, the PSC approved the retirement and decertification of Plant Scherer Unit 3 by December 31, 2028. In Georgia Power's subsequent 2023 Integrated Resource Plan Update, the Company noted new information regarding continuing increases to the projected load forecast and capacity needs following 2028. As a result, the Company will likely evaluate extending the operation of Plant Scherer Unit 3 beyond 2028. This evaluation will include updated unit retirement studies for these units in the 2025 IRP and may recommend extending their operation.

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Plant Scherer Unit 4 is owned by Florida Power & Light and Jacksonville Electric Authority. The owners ceased operation of Unit 4 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.

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 ELG Progress Reports.

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 has been simplified and no longer reflects the implementation of the ELG pilot study, as the study was successfully completed in September 2024. The updated schedule illustrates an approximate 6–8-month extension in each of the major schedule components (engineering, procurement, construction, and commissioning). This revision is in response to the pilot project completion date and procurement of the selected technology. The schedule now supports a January 2027 through January 2028 commissioning period, which is still well in advance of the statutory applicability date of December 31, 2028.

The Company continues 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

