

June 27, 2025 **ELECTRONIC MAIL**

Mr. Brian Boutelle Georgia Environmental Protection Division Mountain District Office 16 Center Road Cartersville, Georgia 30120

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

Dear Mr. Boutelle:

In accordance with Part III.C.7.g. of the above referenced permit, Georgia Power is submitting the June 2025 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 Stephanie Whitacre at 470-367-0303 or swhitacr@southernco.com.

Sincerely,

Dominic Weatherill Water Programs Manager

Cc: Kelli-Ann Schrage





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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") May 7, 2024, publication of the ELG Supplemental Rule. The rule establishes new requirements for FGDW treatment but also retains the final 2020 rule limitations". See 89 Fed. Reg. at 40, 254.

This report summarizes progress at Plant Bowen in meeting the Effluent 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. In the 2025 IRP, the Company submitted unit retirement studies and recommends a retirement date at the end of 2038 for Bowen Units 1-4.





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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 June 2025, the Engineering, Procurement, and Construction (EPC) contractor has reached the milestone of construction substantially complete. The Motor Control Centers (MCCs) were long lead-time equipment and arrived on site in May 2025. The FGDW treatment system project is currently in an MCC outage; the temporary electrical equipment is being removed and the MCCs are being installed. Once installed and verified, the project will be electrically complete. The FGDW treatment system project will move into start up and commissioning in July 2025, followed by optimization and performance testing.

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 impacting coal-fired power plants, including the 2024 publication of the ELG Supplemental Rule.





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Figure 1

