

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 *Effluent 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

