

October 13, 2021

BY EMAIL AND CERTIFIED MAIL

Ms. Audra Dickson, Manager
Wastewater Regulatory Program
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Dr.
Atlanta, GA 30334

**RE: Plant Scherer – NPDES Permit No. GA0035564
Notice of Planned Participation Scherer Units 1 and 2**

Dear Ms. Dickson:

Pursuant to 40 C.F.R. § 423.19(h), Georgia Power Company (the “Company”) submits the following Notice of Planned Participation (“NOPP”) for Plant Scherer Units 1 and 2.

The Plant discharges under NPDES Permit No. GA0035564, currently in the process of renewal. The Company has requested that the next version of the permit include generally applicable effluent limitations for flue gas desulfurization wastewater (“FGDW”) based on 40 C.F.R. § 423.13(g)(1)(i) as well as alternative FGDW limits based on 40 C.F.R. § 423.13(g)(2)(i), for units that will permanently cease coal combustion by December 31, 2028 and based on 40 C.F.R. § 423.13(g)(3)(i), for the Voluntary Incentives Program. The Company hereby notifies the Georgia Environmental Protection Division (“EPD”) that Plant Scherer Units 1 and 2 will participate in the Voluntary Incentives Program and will comply with the alternative limits at 40 C.F.R. § 423.13(g)(3)(i).

The Company is also informing EPD through separate notifications that Units 3 and 4 intend to permanently cease coal combustion by no later December 31, 2028 and are eligible for the alternative limits at 40 C.F.R. § 423.13(g)(2)(i). However, and as reflected in the associated NPDES permit application for the permit renewal, Plant Scherer utilizes an FGDW system that is common to all units and as such the VIP limits should apply at Outfall 03J.

The Company submits the following information pursuant to 40 C.F.R. § 423.19(h)(2):

The facility opting to comply with the Voluntary Incentives Program limits:

Plant Scherer Unit 1.
Plant Scherer Unit 2.

The technology or technologies projected to be used to comply with those limits:

The Company currently projects the use of a membrane system followed by a spiral-wound reverse osmosis system for the permeate. A separate crystallizer system will manage the concentrate from the membrane system for landfill disposal. This technology and its potential application at Plant Scherer were further described in the Company’s February 19, 2021 submittal to EPD (Effluent Limitations Guidelines Applicability Timing: Georgia Power Plant Scherer or the “Applicability Timing Document”) and in

correspondence to EPD dated June 16, 2021. The Company reserves the right to alter these projections as it conducts further analysis of relevant technologies.

Detailed engineering dependency chart and accompanying narrative demonstrating when and how the system(s) and any accompanying disposal requirements will be achieved by December 31, 2028:

The Company has composed the engineering dependency chart (“chart”) detailing the currently projected pathway and interim targets to achieving compliance with the effluent limits at 40 C.F.R. § 423.13(g)(3)(i) by December 31, 2028. The chart is provided as Attachment 1 to this correspondence and illustrates a target construction completion date of early 2027, with start-up and operation of the system commencing in late 2027. The targets in the chart are necessarily tentative given the need for further evaluation and refinement of the proposed technological solutions and associated concentrate management. Some targets might prove unnecessary to achieving compliance with VIP limits and related solid waste disposal requirements.

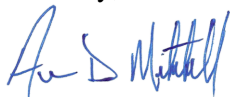
Research and testing performed to date indicates that a membrane treatment solution is viable at Plant Scherer, even though it remains infeasible at the other Company facilities that generate FGDW. The attached chart details the comprehensive elements of the project including the on-going testing and research work through final regulatory compliance. The initial efforts of research-and-development testing of the membrane system and concentrate management are critical elements for supporting the conceptual design work that is projected to run through mid-2024. However, the specifics of what (if any) pre-treatment requirements may be needed at Plant Scherer, as well as the solids disposal challenges warrant a cautious approach to project implementation. Membrane-based treatment of FGDW has not yet been reliably demonstrated anywhere in the United States, and such a treatment solution must comprehensively support a fully compliant approach for both the permeate and concentrate products from the system.

The Company understands this NOPP above to fully satisfy the requirements of 40 C.F.R. § 423.19(h), and the Company reserves its ability to submit a later determination of a new compliance pathway if circumstances change or the Georgia PSC requires changes to the Company’s compliance strategy for Plant Scherer Units 1 and 2.

If you need additional information or have questions regarding this matter, please contact Dominic Weatherill at 404-506-3348.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

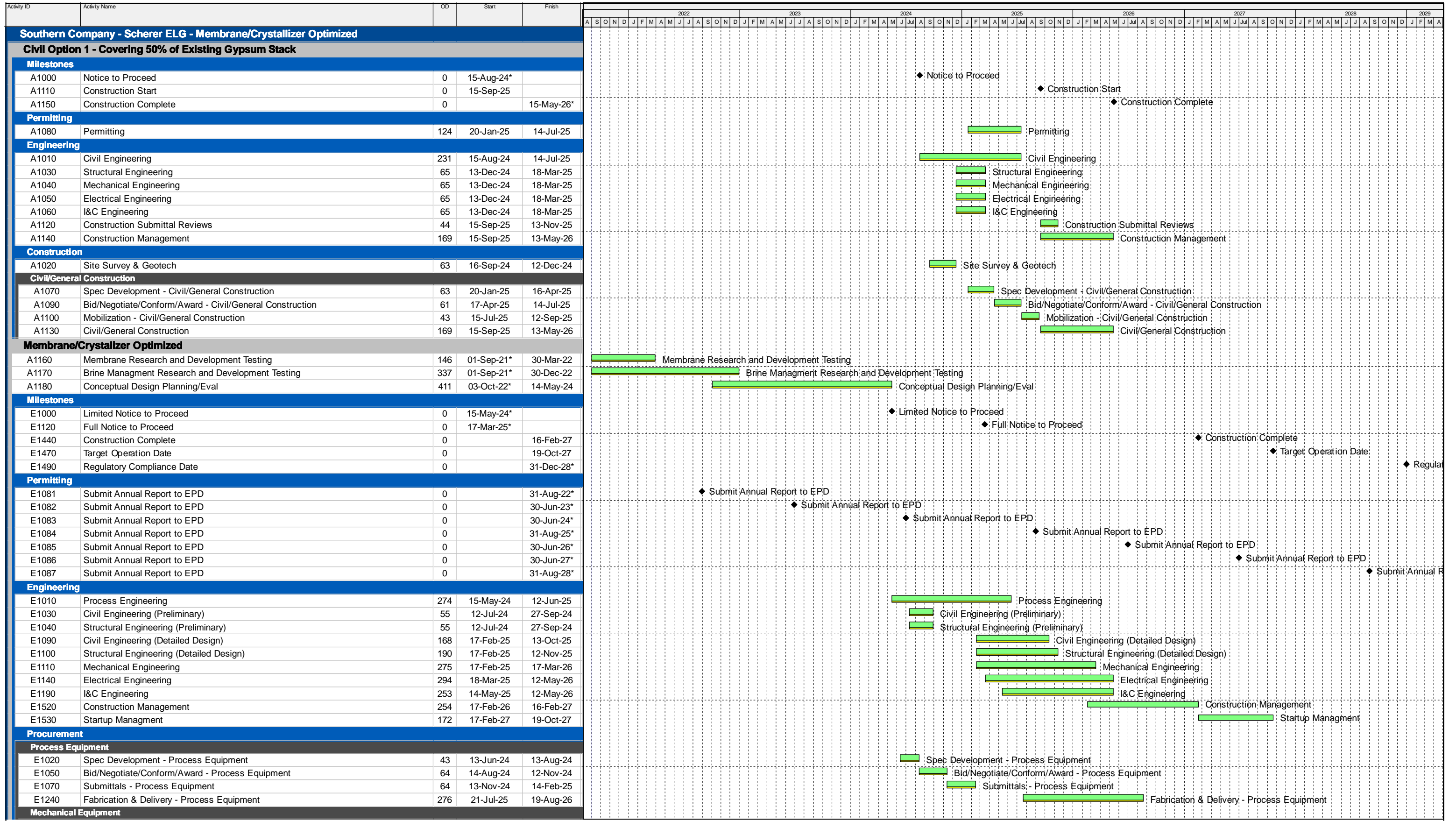
Sincerely,



Aaron D. Mitchell
Environmental Affairs Director

Attachments (1)

Cc: Ms. Sarita Banjade, EPD



- Remaining Level of Effort
- Remaining Work
- Project Baseline Bar
- Critical Remaining Work
- Actual Work
- Milestone



Southern Company - Scherer ELG - Membrane/Crystallizer Optimized

Project Schedule

Page 1 of 2

Start Date 01-Sep-21
 Finish Date 31-Dec-28
 Data Date 01-Sep-21
 Run Date 13-Oct-21

