

December 23, 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 December 2025 progress report for compliance with the Effluent Limitations and Guidelines for Steam Electric Generating Facilities. The Flue Gas Desulfurization (FGD) Wastewater treatment system has been fully commissioned and is in compliance with all NPDES permit requirements and schedule. Accordingly, this serves as the final report.

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



Plant Bowen – NPDES Permit No. GA0001449**ELG Progress Report – December 23, 2025****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 increased capacity requirements 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 subsequent 2025 IRP, the Company submitted unit retirement studies and



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recommended a retirement date at the end of 2038 for Bowen Units 1-4. On July 15, 2025, the PSC approved the 2025 IRP.

The PSC approval of 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, with the expansion of the physical-chemical treatment system for arsenic and mercury treatment and addition of biological treatment systems necessary for meeting the selenium and nitrate-nitrite limits.

The FGDW project was executed with an Engineering, Procurement, and Construction (EPC) Contractor. In June 2025, the Engineering, Procurement, and Construction (EPC) contractor reached the milestone of construction substantially complete. The FGDW treatment system began start up and commissioning in July 2025 and progressed to optimization and performance testing in September 2025. The project is currently in the optimization phase which includes chemical dosing and system tuning in preparation for the compliance deadline of December 31, 2025.

Plant Bowen is on schedule to meet the generally applicable effluent limits specified in Part I.A.5 of the permit by December 31, 2025. 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

