

Environmental Affairs
Bin 10221
241 Ralph McGill Boulevard NE
Atlanta, Georgia 30308-3374



November 1, 2013

Mr. Keith Bentley
Branch Chief
Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

Re: Comments on Proposed Regional Haze Periodic Progress Report

Dear Mr. Bentley:

Georgia Power offers the following comments on the Proposed Regional Haze Periodic Progress Report dated August 27, 2013 developed by the Georgia Environmental Protection Division (EPD).

1. Plant McDonough Emission Reductions

In Table 2-2 on pages 16 and 17, EPD should revise the "Emissions Control Measure" column for McDonough Units 1 and 2 to reflect that the required SO₂ control measure under the Georgia Multipollutant Rule (Georgia Rules for Air Quality Control, 391-3-1-.02(2)(sss)) and the Georgia SO₂ Emissions Rule (Georgia Rules for Air Quality Control, 391-3-1-.02(2)(uuu)) was to install scrubbers (FGD), not to replace the coal units with gas units. Instead of installing scrubbers, Georgia Power chose to retire McDonough Units 1 and 2 and replace them with natural gas-fired combined cycle units, which achieved even greater SO₂ reductions than required by the Georgia Multipollutant Rule or SO₂ Emissions Rule.

2. Upcoming Georgia Power Plant Retirements

Georgia Power's actions related to recent plant retirement announcements should not be included in the section discussing the Georgia Multipollutant Rule on pages 14 and 15. While the potential costs of the Georgia Multipollutant Rule and the Georgia SO₂ Emissions Rule were among the factors considered in the retirement decisions for some of the units, there were other significant drivers. In addition, there were units that were included in the retirement request with the Georgia Public Service Commission that are not subject to emission limits or control technology requirements under the Georgia Multipollutant Rule and SO₂ Emissions Rule. Thus, the discussion of these retirements should be included in the "Emission Reduction Measures Not included in the Regional Haze SIP"

section rather than the Multipollutant Rule section, since the retirements result in greater than expected emission reductions for those affected plants.

3. Table 2-4

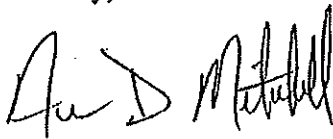
Table 2-4 on page 26 should be re-titled from "Status of Regional Haze SIP SO₂ Reduction Measures" in order to clarify that one of the items listed under the "Requirement" column, the Georgia Multipollutant Rule, is not a formal part of the Regional Haze SIP. A suggested revised title could read, "Status of SO₂ Reduction Measures During Present Regional Haze Planning Period."

4. Plant Branch Multipollutant Rule Revisions

On pages 14 and 43, EPD may want to note that even though the schedule for the required control under the Georgia Multipollutant Rule and Georgia SO₂ Emissions Rule was shifted to a later date for Branch Unit 1, other measures were taken at the same time to ensure equivalent emission reductions from the site, including moving the required schedule earlier and setting an emissions cap for Branch Units 3 and 4. Thus, there is no impact from the change in the Branch Unit 1 date to the expected emissions reductions.

Georgia Power appreciates the opportunity to review and comment on the Proposed Regional Haze Periodic Progress Report. If you have any questions about these comments, please contact Rosa Chi at (404) 506-3123.

Sincerely,



Aaron D. Mitchell
Air Programs Supervisor

TRC

Responses to Comments Received on the Prehearing Version of Georgia's Regional Haze Periodic Progress Report

On September 16, 2013, Georgia EPD issued a public notice requesting comments on Georgia's Regional Haze Periodic Progress Report. No comments were received during the public hearing on October 31, 2013. Written comments were received from Georgia Power Company. USEPA Region 4 reviewed the prehearing report but had no comments. Georgia Power's comments and EPD's responses are presented below.

Written Comments, Georgia Power Company

Comment: Plant McDonough Emission Reductions. In Table 2-2 on pages 16 and 17, EPD should revise the "Emissions Control Measure" column for McDonough Units 1 and 2 to reflect that the required SO₂ control measure under the Georgia Multipollutant Rule (Georgia Rules for Air Quality Control, 391-3-1-.02(2)(sss)) and the Georgia SO₂ Emissions Rule (Georgia Rules for Air Quality Control, 391-3-1-.02(2)(uuu)) was to install scrubbers (FGD), not to replace the coal units with gas units. Instead of installing scrubbers, Georgia Power chose to retire McDonough Units 1 and 2 and replace them with natural gas-fired combined cycle units, which achieved even greater SO₂ reductions than required by the Georgia Multipollutant Rule or SO₂ Emissions Rule.

EPD Response: EPD agrees and Table 2-2 was revised accordingly. In addition, a sentence was added to the second paragraph on Page 14 to specifically address the closure of McDonough Units 1 and 2.

Comment: Upcoming Georgia Power Plant Retirements. Georgia Power's actions related to recent plant retirement announcements should not be included in the section discussing the Georgia Multipollutant Rule on pages 14 and 15. While the potential costs of the Georgia Multipollutant Rule and the Georgia SO₂ Emissions Rule were among the factors considered in the retirement decisions for some of the units, there were other significant drivers. In addition, there were units that were included in the retirement request with the Georgia Public Service Commission that are not subject to emission limits or control technology requirements under the Georgia Multipollutant Rule and SO₂ Emissions Rule. Thus, the discussion of these retirements should be included in the "Emission Reduction Measures Not included in the Regional Haze SIP" section rather than the Multipollutant Rule section, since the retirements result in greater than expected emission reductions for those affected plants

EPD Response: EPD agrees. The discussion of upcoming retirements was moved to Section 2.2 (Emission Reduction Measures Not included in the Regional Haze SIP).

Comment: Table 2-4. Table 2-4 on page 26 should be re-titled from "Status of Regional Haze SIP SO₂ Reduction Measures" in order to clarify that one of the items

Responses to Comments – Regional Haze Periodic Progress Report

listed under the “Requirement” column, the Georgia Multipollutant Rule, is not a formal part of the Regional Haze SIP. A suggested revised title could read, “Status of SO₂ Reduction Measures During Present Regional Haze Planning Period.”

EPD Response: Paragraph 40 CFR 51.308(g)(1) of the regional haze rule requires the progress report to provide the status of implementation of the emission reduction measures that were included in the original regional haze SIP. Measures in the regional haze SIP include Federal programs, Georgia’s requirements for EGUs, and Georgia’s requirements for non-EGU point sources.

Paragraph 40 CFR 51.308(g)(2) requires the progress report to provide a summary of the reductions described in paragraph (g)(1). Table 2-4 is included in the progress report to satisfy the requirement of paragraph (g)(2) and it is not intended to include measures that were not included in the regional haze SIP (which are described in Section 2.2). The table title suggested in the comment would imply that these other measures were included, and this would not appropriately address the requirements of paragraphs (g)(1) and (g)(2).

Comment: **Plant Branch Multipollutant Rule Revisions.** On pages 14 and 43, EPD may want to note that even though the schedule for the required control under the Georgia Multipollutant Rule and Georgia SO₂ Emissions Rule was shifted to a later date for Branch Unit 1, other measures were taken at the same time to ensure equivalent emission reductions from the site, including moving the required schedule earlier and setting an emissions cap for Branch Units 3 and 4. Thus, there is no impact from the change in the Branch Unit 1 date to the expected emissions reductions.

EPD Response: Georgia Power’s statement regarding other measures at Plant Branch is correct. The text was revised to add that the net effect of the controls schedule changes at Units 1, 3, and 4 and of the emissions caps on 3 and 4 should be an increase in SO₂ emissions from Branch in 2014 but an even larger decrease in emissions in 2015 compared to the base case (original regional haze SIP projections). After 2015 there is no change from the base case.