

Flint Riverkeeper Concerns Regarding
Georgia Power Plant Mitchell
Draft Clean Water Act (NPDES) Wastewater Discharge Permit

Coal ash pollution

- Coal ash is the waste byproduct left behind from burning coal for electricity, and contains toxic pollutants such as arsenic, mercury, selenium, chromium, and lead.
- EPA has recognized that these pollutants concentrate up the food chain resulting in long-term damage to aquatic ecosystems.
- Toxic wastewater discharged from the coal power plant industry is by far the largest category of industrial wastewater pollution. To put it in context, one-half of *all* the toxic pollution of all the rivers of America comes from these type of plants. Accordingly, we take waste discharges from Plant Mitchell seriously, and urge EPD to do the same.

Coal ash pond dewatering / ash pond closure

- As a retired coal fired power plant, Plant Mitchell stores a massive quantity of coal ash waste in its three ash ponds, in addition to impounded wastewater within at least two of those ponds.
- Georgia Power announced its plans to close these coal ash ponds, but it hasn't disclosed many details beyond a general timeline to the public, nor to EPD.
- To close the ponds, Georgia Power will need to drain, or dewater, the impounded wastewater held in these ponds.
- Pond dewatering is of particular concern to us – the wastewater sitting in these ponds contains high concentrations of toxic pollutants. This is the wastewater that Georgia Power will pump into to the Flint River through dewatering.
- If not performed properly, dewatering can also release sediment, foam, and other material that discolors the river and harms downstream water quality and wildlife.

Permit deficiencies

- Georgia Power has applied for a Clean Water Act discharge permit for ordinary plant stormwater discharge; it has not yet applied for a permit to authorize the complete draining and dewatering of the coal ash ponds, nor has it submitted proposed wastewater treatment methods for that activity.
- The draft permit would allow Georgia Power to completely pump the wastewater out of the ash ponds pursuant to a "Dewatering Plan" that would be submitted to EPD (but not the public) at some later date. This Dewatering Plan will not be a part of the wastewater discharge permit.
- The draft permit would allow EPD to approve a plan to dewater Plant Mitchell's ash ponds without any public notice or opportunity for comment. This means that there would be no public vetting of limits - or lack thereof - on toxic metals being discharged from coal ash ponds.
- Under the draft permit, EPD "may" determine to reopen the permit following receipt of monitoring data and certain other information required under the future Dewatering Plan.

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What should EPD do?

- EPD should revise the draft permit to prohibit wastewater releases as part of the dewatering process until the required steps are taken to ensure appropriate limitations on coal ash pollutants are imposed.
- We also urge EPD to allow for full participation by the public in that process.
- Georgians deserve to have clean water and water supplies protected from the toxic threat of coal ash.

Conclusion

- EPD proposes to put the cart before the horse – to allow a different form of discharge sometime in the future without first assessing the need for new effluent limitations on that discharge, and enabling the public to weigh in on these issues prior to authorizing the discharges.
- EPD must live up to its mission to protect Georgia’s environment, by issuing a permit that prohibits dewatering wastewater releases until the required steps are taken to ensure appropriate limitations on coal ash pollutants are imposed on those releases. None of these limitations are in place within the draft permit.