



**Certified Mail**

April 19, 2022

Ms. Crystal Rippy  
Manager, Industrial Wastewater Permitting Section  
Bureau of Water  
2600 Bull Street  
Columbia, SC 29201-1708

RE: Winyah Generating Station NPDES Permit (NPDES 0022471), Georgetown County

Dear Ms. Rippy:

As we've previously discussed, Santee Cooper's current integrated resource plan (IRP) calls for retirement of the coal-fired steam electric units at the Winyah Generating Station, and Santee Cooper plans to complete retirement by December 31, 2028. These plans allowed the utility to submit a notice of planned participation (NOPP) in the permanent cessation of coal combustion ("retirement") subcategory (40 CFR 423.13(g)(2)(i)) and (k)(2)(ii) under the 2020 steam electric reconsideration rule ("2020 ELG Rule"), the NOPP having been filed on October 8, 2021.

Another provision under the 2020 ELG Rule (40 CFR 423.13(o)(1)(ii)(B)) allows for automatic transfer from the retirement subcategory to an additional subcategory known as the Voluntary Incentive Program (VIP, 40 CFR 423.13(g)(3)) by submittal of a transfer NOPP. This possibility allows for automatic transfer so long as the transfer NOPP is filed on or before December 31, 2025, and the alternate limits are written into the permit.

With this letter, we're requesting that the VIP requirements be included within the permit language of the draft permit, in the event that Santee Cooper's plans for retiring the Winyah facility are delayed for some reason, which could include new EPA rules that change the economics of closure and difficulty in permitting and constructing a replacement source of electrical generation, among others. We understand this may necessitate a new public hearing.

We are attaching some proposed language for the department's consideration. We look forward to discussing this with you or your staff further. If you have any questions or concerns, please contact me at (843) 761-8000, extension 4377 or by email at [jesse.cannon@santeecooper.com](mailto:jesse.cannon@santeecooper.com).

Sincerely,

A handwritten signature in blue ink that reads 'Jesse W. Cannon'.

Jesse W. Cannon, P.E.  
Manager  
Water & CCR Environmental Services

Attachment: Proposed Language for New Permit

JWC:sg

Proposed Language for the Consideration of the Bureau of Water

A new limits page could be inserted after page 26 of 45 including the requirements of 40 CFR 423.13(g)(3), copied below. Following the language of the current draft, this would be the seventh outfall listed and could be assigned outfall serial number 02G. It could also state that this is FGD Wastewater (internal to outfall 001 and 002) and contingent upon submission of a transfer NOPP by December 31, 2025, and effective on or after December 31, 2028. In the event a transfer NOPP is not filed, the limits at 02E will apply.

Pollutant or pollutant property	BAT effluent limitations	
	Maximum for any 1 day	Average of daily values for 30 consecutive days shall not exceed
Arsenic, total (ug/L)	5	NA
Mercury, total (ng/L)	23	10
Selenium, total (ug/L)	10	NA
Nitrate/Nitrite (mg/L)	2.0	1.2
Bromide (mg/L)	0.2	NA
TDS (mg/L)	306	149

Additional language describing this transfer option should be provided under part V., Other Requirements, likely after A. 9. or E.12.:

- The permittee may elect to automatically transfer from the FGD wastewater requirements at 02E to those at 02G given submittal of a transfer notice of planned participation (NOPP) by December 31, 2025. Such limits shall be effective on or after December 31, 2028 per the terms of the federal rule at 40 CFR 423.13(g)(3).
- In the event the permittee transfers into the VIP subcategory, the standard limits for bottom ash transport water (BATW) will apply in lieu of the limits allowed by 40 CFR 423.13(k)(2)(ii), by a date determined by the Department that is as soon as possible beginning October 13, 2021 but no later than December 31, 2025.
  - The as soon as possible date will be determined by the Department upon request of the Permittee per the terms of 40 CFR 423.11(t).
  - The standard limits for BATW are no discharge unless it is used in the FGD scrubber, except for discharges authorized at 40 CFR 423.13(k)(2). This volume may not exceed ten percent of the primary active wetted bottom ash system volume over a 30-day rolling average and shall be determined by the department.

- In order to discharge BATW under 40 CFR 423.13(k)(2), an initial certification statement meeting the requirements of 40 CFR 423.19(c) must be provided to the Department by the as soon as possible date.

Generally, this language can be reproduced in the rationale for a new outfall 02G and regarding bottom ash at the section currently beginning on page 31.