REQUEST TO DISTURB 50 ACRES OR MORE UNDER GENERAL NPDES PERMIT NO. GAR100001

Project Name: Smarr Combined Cycle Energy Facility

- i. **Technical Justification for Disturbing 50 or More Acres**: See Section III.
- ii. **Total Planned Acres of Disturbance**: Approximately 147 acres of vegetation clearing and 135 acres of grading.
- iii. Owner and Operator Information:
 - Legal name: Oglethorpe Power Corporation
 - Address: 2100 E. Exchange Place, Tucker, GA 30084
 - Phone number: 770-270-7600
- iv. **Project Description**: See Section I.
- v. **List of Certified Inspectors and their Certifications:** The certified personnel listed below will be providing support for this Project, copies of their certifications can be found in Appendix A.
 - Level II Certified Engineer: Joshua Bell, S&ME (0000110641).
 - SWPPP Inspectors: The following inspectors from Terracon Consultants, Inc. (Terracon) will be providing SWPPP inspections at the site:
 - o Jerry Williams Level IB
 - Dustin Wallace Level 1A
 - o Joshua Brown Level 1A
 - Jackson Mathis Level IB
 - o Marina Terraza Level 1B
- vi. **Site Map:** See Appendix B, Figure 1

I. Project Description and Purpose

Oglethorpe Power Corporation (An Electric Membership Corporation) (OPC), is headquartered in Tucker, Georgia, and is a generation cooperative operating on a not-for-profit basis. OPC generates electricity for 38 of Georgia's electric membership cooperatives (EMCs). OPC's objective is to provide reliable energy to its EMC members to meet their existing and expanding power supply needs. To address demand growth anticipated in its service territories, OPC is proposing to construct a new natural gas-fired combined-cycle (NGCC) electric power generating facility. The Smarr Combined Cycle Energy Facility (the Project) will have a nominal total capacity of approximately 1,425 MW-net. The Project will provide reliable and cost-effective power to meet projected EMC member daily and year-round load requirements, maximum system capacity demands, peak load events, and planning reserve margin targets.

The proposed power generating facility consists of two (2) combined-cycle power blocks each in a 1 × 1 × 1 configuration (i.e., one combustion turbine, one heat recovery steam generator [HRSG] with duct burner, and one steam turbine per power block). The Project will be located on property currently owned by OPC, located approximately two miles southeast of the unincorporated community of Smarr near Forsyth, Monroe County, Georgia. Project development work for the new generating units to be covered under the General National Pollutant Discharge Elimination System (NPDES) Permit No. GAR100001, Authorization to Discharge Under the NPDES Stormwater Discharges Associated with Construction Activity for Stand Alone Construction Projects, with an effective date of August 1, 2023 (i.e., "Construction Stormwater General Permit"), includes vegetation clearing and site grading. The Project will be constructed using standard construction techniques and sequencing. In total, approximately 147 acres of land will be disturbed, of which 135 acres will be graded at elevations to provide the working surface for the future facility (i.e., the "Project Area"). Notice of Intent (NOI) GAR18BBAF-V1 was

previously submitted on September 8, 2025, for the tree clearing phase of this Project. The work associated with that NOI is underway and will not require disturbing more than 50 acres of land at a time. This NOI is being requested for the removal of stumps, mass grading, civil cutting, and fill work associated with grading, which will take place following the tree clearing activities and will involve disturbing more than 50 acres at a time. A Notice of Termination (NOT) will be submitted for each NOI after associated activities conclude and the site is stabilized. A separate entity will construct the buildings and infrastructure and will obtain their own NOI for that phase of the Project.

II. Latitude and Longitude and Project Location

The proposed Smarr Combined Cycle Energy Facility address is 555 Ray Hartley Road, Forsyth, Georgia 31029. The latitude and longitude of the approximate center of the Project Area are 32.975581° N, 83.845154° W.

III. Technical Justification for Disturbing 50 or More Acres

Site Grading Requirements

The proposed Project includes construction of the NGCC power blocks and ancillary infrastructure including the below. However, as noted above, this NOI is being submitted for the removal of stumps, mass grading, civil cutting, and fill work associated with grading:

- The following buildings:
 - Two (2) steam turbine buildings (one per power block) measuring approximately 140 ft. length (L) x 180 ft. width (W) x 55 ft. height (H);
 - O Warehouse measuring approximately 91 ft. W x 187 ft. L x 35 ft. H;
 - o Maintenance Building measuring approximately 41 ft. W x 122 ft. L x 20 ft. H; and
 - Control and Administration Building measuring approximately 51 ft. W x 237 ft. L x 20 ft.
- The following storage tanks:
 - o Demineralized Water Storage Tank measuring approximately 40 ft. diameter x 48 ft. H;
 - o Service Water Storage Tank measuring approximately 52 ft. diameter x 40 ft. H;
 - o Ammonia Storage Tank measuring approximately 73 ft. L x 42 ft. W;
 - Oil/Water Separator Tank measuring approximately 26 ft. L x 8 ft. W;
 - o Condensate Collection Tank measuring approximately 50 ft. L x 15 ft. W;
 - o HRSG Blowdown Tank measuring approximately 15 ft. diameter x 16 ft. H;
 - o Firewater Storage Tank measuring approximately 40 ft. diameter x 48 ft. H; and
 - Other small tanks (<1,000 gallons) and drums containing distillate fuel oil, lubricating oils, and mineral oil to support plant operations and auxiliary equipment.
- Two (2) air cooled condensing steam cycle cooling units;
- Site grading and stormwater detention;
- Construction of the site access road (i.e., plant entrance road and ring road that loops around the entire power block), which will be paved and measure approximately 30 ft. wide by 2,000 ft. in total length);

- Construction of on-site roadways to provide access to the power blocks and steam turbine buildings which will be paved and measure approximately 24 ft. wide by 3,500 ft. in total length);
- Paved employee parking lot designed for approximately 66 vehicles;
- Construction parking and equipment laydown areas totaling approximately 56 acres will be constructed with crushed stone and maintained for future equipment laydown and contractor parking, as needed, to meet outage requirements;
- Installation of an 8-inch diameter underground water line measuring approximately 3,000 feet in length to tie-into the existing Monroe County municipal water system;
- Installation of an 18-inch diameter underground water discharge pipeline measuring approximately 200 ft. feet in length and construction of a discharge structure consisting of the discharge pipeline, silt fencing, and riprap to discharge process waters to an unnamed tributary to Little Deer Creek; and
- Construction of a new switchyard and an approximately 300 ft. long overhead 500 kV transmission line to tie-into the Georgia Transmission Corporation (GTC) 500 kV transmission line located adjacent west of the switchyard.

See Appendix B, Figure 7 for a depiction of the proposed site layout. Tree clearing activities will not disturb more than 50 acres at a time; however, removal of stumps, mass grading, civil cutting and fill work will need to disturb more than 50 acres at a time in order to achieve uniform elevation for the site. The site features an elevation change of over 100 feet across the whole area. As a result, mass earthwork is required in order to provide a constant elevation between the power block area (25 acres) and switchyard (34 acres). A continuous level pad of approximately 59 acres to accommodate the Project Area will be required. As a result of the mass earthwork required for the elevation change around the perimeter of the site, in total approximately 147 acres of land will be cleared of vegetation, and approximately 135 acres will be graded for construction of the NGCC facility and associated equipment. Grading of footprints required for later equipment installation, such as switchyard/substation and transmission lines, is not separable from the grading for the NGCC facility and power block area predominately due to the desired pad elevation, the cut and fill slopes necessary to achieve the desired pad elevations, and the use of suitable onsite cut materials to form the fills.

Integrated Stormwater Management System

The site's topography requires a comprehensive grading approach to establish proper drainage patterns directing runoff to detention basins. There will be three basins total, as shown on the grading plan provided in Appendix B, Figure 6. Two basins will discharge to the unnamed tributary to Little Deer Creek north of the site. One basin will discharge to a perennial unnamed tributary to Little Deer Creek southwest of the site. The basins will be constructed simultaneously with the building pad to ensure consistent slope gradients, sufficient tie-in elevations between the building area and stormwater infrastructure, and prevention of erosion that might occur if drainage patterns were incomplete.

Soil Stabilization Requirements

Soil stabilization requirements are also another consideration towards the need to disturb more than 50 acres simultaneously. Smaller, partial grading would have the potential to expose different soil areas to varying weather conditions over time, thus making it more difficult to achieve consistent compaction and moisture levels required for the facility's structural loads. This integrated approach, while disturbing more than 50 acres simultaneously, has the potential to minimize overall environmental impact by

reducing the total construction time, ultimately reducing the amount of time that soils remain exposed and unstabilized.

Construction Sequencing and Safety

An additional factor for why mass grading is warranted for this Project is because smaller phased grading might create unfavorable elevation changes and unstable slopes between completed and pending grading phases, posing safety risks to workers and equipment. The mass grading operation requires coordinated cut-and-fill operations to balance earthwork across the site and create continuous haul routes for efficient soil movement between cut and fill areas.

Equipment Efficiency and Project Timeline

The Project will require mobilization of specialized heavy earthmoving equipment (large dozers, mobile cranes, and other compaction equipment) that is most fiscally effective when used continuously across the Project Area. The tree clearing phase of the Project will occur over a period of approximately 6-8 weeks, and the grading phase will occur over a period of approximately 5 months with construction activities scheduled to commence October 2025. A smaller, partial phased approach might require multiple equipment mobilizations, creating coordination delays that could ultimately extend the Project timeline. Furthermore, larger flatly graded pads are required due to the use of cut to form fills and the need for larger working pads for staging, assembling, and installing the facility equipment. Reducing the area graded at any one time would result in large stockpiles within the grading footprint, lengthening the time to reach permanent stabilization in the areas where grading has been completed.

Best Management Practices

This Project will disturb 50 acres or more at any one time and is within one (1) linear mile upstream of an impaired stream segment (Little Deer Creek). As such the following additional best management practices (BMPs), listed in Part III.C.2 of the Construction Stormwater General Permit, are proposed to be implemented for the Project, as required by the Construction Stormwater General Permit:

- A large sign (minimum 4 feet x 8 feet) will be posted on site by the start date of construction. The sign will be visible from a public roadway and include the information required by Part III.C.2(d) of the Construction Stormwater General Permit.
- Turbidity sampling will be conducted after every rain event of 0.5 inch or greater within any 24-hour period, recognizing the exceptions specified in Part IV.D.6.d. of the Construction Stormwater General Permit.
- Soil tests representative of conditions at the time of planting will be conducted to identify and to
 implement site-specific fertilizer needs and/or add appropriate organic soil amendments (e.g.,
 compost), and pre- and post-construction soil sampling to a depth of six (6) inches will be
 conducted to document improved levels of soil carbon after final stabilization of the construction
 site.
- Certified personnel will conduct inspections at least twice every seven (7) calendar days and within 24 hours of the end of the storm that is 0.5 inches rainfall or greater in accordance with Part IV.D.4.a.(3)(a)-(c) of the Construction Stormwater General Permit.

Appendices

Appendix A – Certifications

Appendix B – Figures

Figure 1 – Site Map

Figure 2 – Limits of Disturbance Map

Figure 3 – Soil Map

Figure 4 – Topographic Map

Figure 5 – Sensitive Water Features Map

Figure 6 – Grading Plan

Figure 7 – Site Layout

Appendix A – Certifications







Certificate of Completion

In fulfillment of the State of Georgia's GASWCC recertification requirement for "Certified Personnel" is hereby granted to

Jerry Williams

GASWCC Certified Instructor

T. Luke Owen

For Successful Completion of

Permit Requirements, Site Inspections, & "State Waters" for Construction Sites in Georgia

A GASWCC Approved Recertification Seminar for:

Level 1B Advanced Fundamentals

Course Date:

June 8, 2025







Certificate of Completion

In fulfillment of the State of Georgia's GASWCC recertification requirement for "Certified Personnel" is hereby granted to

Dustin Wallace

GASWCC Certified Instructor

T. Luke Owen

Luke Owe

For Successful Completion of

Permit Requirements, Site Inspections,

«L "State Waters" for Construction

Sites in Georgia

A GASWCC Approved Recertification Seminar for

Level 1A Fundamentals

November 11, 2024









Certificate of Completion

In fulfillment of the State of Georgia's GASWCC recertification requirement for "Certified Personnel" is hereby granted to

Joshua Brown

GASWCC Certified Instructor

T. Luke Owen

For Successful Completion of Permit Requirements, Site Inspections,

& "State Waters" for Construction Sites in Georgia

A GASWCC Approved Recertification Seminar for

Level 1A Fundamentals

February 12, 2025









Certificate of Completion

In fulfillment of the State of Georgia's GASWCC recertification requirement for "Certified Personnel" is hereby granted to

Jackson Mathis

GASWCC Certified Instructor

T. Luke Owen

Course Date:

May 28, 2025

For Successful Completion of

Permit Requirements, Site Inspections,

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Marina J Terraza

Level IB Certified Inspector

CERTIFICATION NUMBER __ ISSUED: 10/08/2024 0000094929

EXPIRES: 10/08/2027

Appendix B – Figures













