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Environmental Manager | Raven Power Group – Talen Energy
2030 Brandon Shores Road • Baltimore, MD 21226

December 31, 2025

Attention: Discharge Monitoring Reports
Water and Science Administration – Compliance Reports
Maryland Department of the Environment
1800 Washington Blvd., Suite 425
Baltimore, MD 21230-1708

**RE: RAVEN POWER FORT SMALLWOOD, LLC – TALEN ENERGY, LLC
STATE DISCHARGE PERMIT NO. 13-DP-0194A / NPDES PERMIT NO. MD0001503
NOTICE OF PLANNED PARTICIPATION IN 2034 CESSATION OF COAL COMBUSTION
SUBCATEGORY (PURSUANT TO 40 CFR §423.19(f)(1)(2))**

To Whom This May Concern:

Raven Power Fort Smallwood LLC (Raven Power) is an independent power producer which owns and operates four steam electric generating units - Brandon Shores Unit 1 and Unit 2, H.A. Wagner Unit 3, and H.A. Wagner 4-which has always burned oil, and does not fall under the applicability of the rule- located in Anne Arundel County, Maryland. HA Wagner officially ceased coal burn on December 22, 2023 with a conversion to residual fuel oil (RFO) combustion, and has ceased discharging bottom ash transport waters (BATW) (note it did not have a scrubber, so there has never been FGD wastewaters). Therefore, the Wagner plant is neither in nor out of compliance with the applicable limitations and standards associated with bottom ash transport water and flue gas desulfurization water, because those wastewaters are not being produced. For more detail on Wagner's conversion to RFO, please see the *Raven Power 2024 Annual NOPP Progress Report* that was submitted to MDE and posted on H.A. Wagner's ELG website.

Brandon Shores is in the Permanent Cessation of Coal Combustion (PCCC) subcategory and planned to cease coal combustion and eliminate FGD and BATW wastewaters by the end of 2028. However, a reliability must run (RMR) agreement was issued by PJM on January 27, 2025, and later approved by the Federal Energy Regulatory Commission (FERC) that requires Brandon Shores' Units 1 and 2 to continue running through May 31, 2029. Through this action, Brandon Shores will be discharging FGD and BATW wastewaters 1) beyond the 12/31/2028 PCCC deadline, but also 2) past the 12/31/2025 PCCC deadline Brandon Shores initially indicated in its NPDES permit. However, since this was a Qualifying Event they continue to be subject to the flue gas desulfurization wastewater requirements in 423.13(g)(2)(i) and the bottom ash transport water requirements in 423.13(k)(2)(ii). Brandon remains in compliance with these limits.

EPA published amendments to the steam electric effluent limitations on May 08, 2024. The amended regulations establish a new subcategory for units that permanently cease coal combustion prior to December 31, 2034, §423.13(l)(2)(i)(A). This subcategory allows power producers to meet numeric limitations for combustion residual leachate (CRL) discharges, as opposed to zero-liquid discharge (ZLD), so long as they cease coal burn prior to December 31, 2034. Since Wagner already

ceased coal burn in 2024, and Brandon Shores would be deactivated, if not for a RMR issued by PJM, Raven Power is supplying this Notice of Planned Participation for the 2034 PCCC Subcategory, to allow for the applicability of the less stringent requirements in the possible case of CRL generation and discharge.

Supporting Documentation:

As an independent power producer, Raven Power is not required to submit integrated resource plans documenting plans for unit conversions and does not need approval of a public utility commission or similar regulatory body for such conversions.

However, on December 22, 2023, H.A. Wagner officially ceased coal combustion and converted to RFO. H.A. Wagner’s conversion was documented in the 2024 Annual Progress report for the 2028 PCCC NOPP, located on H.A. Wagner’s ELG Website.

Additionally, Brandon Shores had submitted a deactivation notice to PJM on April 6, 2023, for no longer generating power by May 31, 2025, which would qualify them for the 2034 PCCC subcategory. However, on January 27, 2025, Brandon Shores entered a RMR agreement (RMR), which requires the plant to run until May 31, 2029. Despite this, the plant would still qualify for the 2034 PCCC subcategory. Information regarding the PJM’s response to the deactivation notice and the RMR can be found in the *Fort Smallwood NPDES ELG Qualifying Event Certification Statement 2.26.2025*, located on Brandon Shore’s ELG Website.

Timeline:

Achievement	Anticipated Completion Date	Status
Submittal Deactivation Notice	April 6, 2023	Completed
Initial Cessation Date	June 1, 2025	Issued RMR to keep running
Receipt of RMR Agreement	January 27, 2025	Completed
End of RMR Agreement/new cessation date	May 31, 2029	

In September 2025, the EPA issued a direct final rule extending a short-term deadline for the 2034 Cessation NOPP and a companion proposal extending many compliance deadlines for the 2024 EPA ELG Rule and providing some flexibility relating to some deadlines in the 2020 ELG Rule. On November 25, 2025, the EPA issued a notice withdrawing the direct final rule due to the receipt of adverse comments. The EPA is proceeding with the proposed rule and has stated that information obtained during this rulemaking will inform whether it will proceed with a second rulemaking to revise the regulatory standards in the 2024 EPA ELG Rule. Since the extension rule will likely not be finalized prior to the existing deadline of December 31, 2025 for the 2034 Cessation Category NOPP, Talen is submitting this preemptively. However, due to the upcoming anticipated changes to the rule, Talen maintains its rights to rescind this NOPP at any point.

Raven Power Fort Smallwood, LLC – Talen Energy, LLC
State Discharge Permit No. 13-DP-0194A / NPDES Permit No. MD0001503
Notice of Planned Participation in Cessation of Coal Combustion Subcategory
Pursuant to 40 CFR §423.19(f)(1)(2)
December 31, 2025



If you have any questions regarding this annual progress report, please feel free to contact me at 410-787-5166 or email at joshua.sawyers@talenenergy.com.

Regards,

A handwritten signature in black ink, appearing to read "J. Sawyers", with a large, stylized flourish at the end.

Joshua Sawyers,
Environmental Manager