

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

May 20, 2014

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL

Mr. Joe Lapcevic  
Senior Scientist  
Allegheny Energy  
800 Cabin Hill Drive  
Greensburg, Pa. 15601

Re: Request for Action Plan regarding Allegheny Energy Company, LLC. - Hatfield's Ferry Power Station

Dear Mr. Lapcevic,

On September 25, 2012 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Allegheny Energy Company, LLC. - Hatfield's Ferry Power Station facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the Allegheny Energy Company, LLC. - Hatfield's Ferry Power Station facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the Allegheny Energy Company, LLC. - Hatfield's Ferry Power Station facility is attached.

This report includes a specific condition rating for the CCR management units and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundments located at the Allegheny Energy Company, LLC. - Hatfield's Ferry Power Station facility. These recommendations are listed in Enclosure 1.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please provide a rationale. Please provide a response to this request by **June 19, 2014**. Please send your response to:

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency (5304P)

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1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**If you are using overnight or hand delivery mail, please use the following address:**

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Drive  
5<sup>th</sup> Floor, N-5838  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov), [dufficy.craig@epa.gov](mailto:dufficy.craig@epa.gov), [kelly.patrickm@epa.gov](mailto:kelly.patrickm@epa.gov) and [englander.jana@epa.gov](mailto:englander.jana@epa.gov).

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as “confidential” you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from this report and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued efforts to ensure protection of human health and the environment.

Sincerely,  
/Barnes Johnson /, Director  
Office of Resource Conservation and Recovery

Enclosures

**Allegheny Energy Company, LLC. - Hatfield's Ferry Power Station  
Recommendations (from the final assessment report)**

**CONCLUSIONS**

As stated previously, the WWT Lagoons do not fall within the scope of this assessment program given that their purpose is for fine particulate settling of low volume wastewater and CCW storage in the WWT Lagoons is minimal. Since the WWT Lagoons do not fall within the scope of this assessment program, no overall condition rating is given in this report.

Some minor deficiencies that the owner may want to address include the following:

- Heavy vegetation on southern outboard slope, tall grass and some trees on remaining outboard slopes.
- Tall grass vegetation on inboard slopes.

Allegheny Energy Company should implement regular visual inspections for perimeter embankment seeps, cracks, holes, and freeboard with the goal of identifying, documenting, and repairing any deficiencies early so that they do not develop into more serious problems. Plant staff should maintain design and construction documents and inspection reports in a well organized manner for future reference.

**RECOMMENDATIONS**

As previously stated, the WWT Lagoons do not fall within the scope of this assessment program. No formal recommendations will be provided.