

US EPA ARCHIVE DOCUMENT

Daniel V. Steen
Vice President, Environmental

April 8, 2009

330-384-3704
Fax: 330-384-5433

Mr. Richard Kinch
U.S. Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive, 5th Floor, N-5783
Arlington, VA 22202-2733

Dear Mr. Kinch:

RE: General Request for Information per Section 104(e) of the Comprehensive
Environmental Response, Compensation, and Liability Act, 42 USC 9604(e)

As Vice President, Environmental for FirstEnergy Corp., I am responding to your
CERCLA Section 104(e) information request.

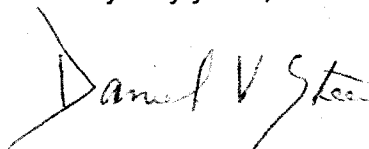
From the language of Mr. Breen's and Ms. Jackson's March 19 letters, it is clear that you are concerned about coal combustion byproduct disposal units which have potential to cause damage to homes, property, or the environment similar to the example cited in the letter. FirstEnergy has one large disposal facility called the Little Blue Run Dam, which receives our coal ash and scrubber sludge from the Bruce Mansfield Power Station. On March 26, 2009, Mr. Richard G. Mende, Director of our Bruce Mansfield Power Station, completed and returned the EPA's CERCLA 104(e) information request regarding the Little Blue Run Dam management unit.

FirstEnergy has several small ponds on our power plant properties which have the potential to receive small amounts of plant wastes and may include coal combustion byproducts.

While FirstEnergy believes Mr. Mende's response to your information request for Little Blue Run Dam meets the intent of EPA's request, the request is sufficiently broad that a secondary response is being submitted categorizing our several small ponds where coal combustion byproducts may be managed in small quantities on a temporary basis until their ultimate disposal elsewhere.

Should you have any questions, please contact me at the above number or
Mr. Michael L. Horvath of my staff at (330) 384-5964.

Very truly yours,



MLH
Enclosures 2
By UPS Ground

Primary Response for:

**FirstEnergy Corp.
76 S. Main Street
Akron, Ohio 44308**

Our Bruce Mansfield Power Station completed their response to EPA's CERCLA 104(e) information request on March 26, 2009 listing the Little Blue Run Dam and Reservoir as their only management unit that fits the intent of your information request. FirstEnergy Corp. has no additional facilities with similar management units.

Secondary Response for:

**FirstEnergy Corp.
76 S. Main Street
Akron, Ohio 44308**

FirstEnergy Corp. does not have any other management units designated as landfills which receive liquid-borne material from a surface impoundment used for storage or disposal of residuals or byproducts from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals.

EPA's request is sufficiently broad that FirstEnergy has included additional information regarding several small ponds on our power station properties which have the potential to receive small amounts of plant wastes, which may include coal combustion byproducts. These ponds are listed in the following spreadsheet on a power station basis.

Secondary Response for:

Bruce Mansfield Plant North LDS Pond (N-LDS)

Bruce Mansfield Plant South LDS Pond (S-LDS)

Bruce Mansfield Plant West HDS Pond (W-HDS)

The answers below are for 3 small ponds located at the Bruce Mansfield Power Station where coal combustion byproducts may be managed in small quantities, from time to time, and on a temporary basis until their ultimate disposal elsewhere. These three ponds are asphalt lined holding ponds of the following heights, sizes and capacities:

N-LDS is 32' high, 3.2 acres and has a capacity of 46 acre ft.

S-LDS is 17' high, 3.1 acres and has a capacity of 42 acre ft.

W-HDS is 27' high, 2.9 acres and has a capacity of 45 acre ft.

They may contain mixtures of fly ash, bottom ash, boiler slag, flue gas emission control residuals, coal pile runoff, and boiler cleaning materials solely from the Bruce Mansfield Power Station.

1. Relative to the National Inventory of Dams criteria for High, Significant, Low or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

These three holding ponds are classified as C2 - Non High Hazard. This rating is established as per 25PaCode105.91 Classification of Dams and Reservoirs. These holding ponds are regulated by the Pennsylvania Department of Environmental Protection (PaDEP).

2. What year was each management unit commissioned and expanded?
These holding ponds began operation in 1975, the year the plant began operating. They have not been expanded.

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).

N-LDS, S-LDS, and W-HDS holding ponds may periodically contain fly ash, bottom ash, boiler slag, flue gas emission control residuals, coal pile runoff, and boiler cleaning materials solely from the Bruce Mansfield Power Station. They are periodically cleaned out and the materials are then sent to Little Blue Run Dam and Reservoir for final disposal.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?

Both the design and construction of these 3 asphalt lined holding ponds were done by professional engineering firms. Gilbert Commonwealth Engineering designed the holding ponds and Dick Corporation constructed the holding ponds. G.A.I. Consultants, another professional engineering firm, conducts inspection and monitoring of these 3 holding ponds.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

G.A.I. visits these holding ponds quarterly to do routine maintenance and safety inspections. Their last two visits were on December 11, 2008 and March 20, 2009. G.A.I. Consultants, Inc. is a 650-person engineering and environmental consulting firm with over 50 years of experience. Corrective actions to these asphalt lined holding ponds has not been needed to date.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent inspection report or evaluation.

Personnel from the PaDEP Division of Dam Safety inspected these 3 holding ponds in October, 2007. These holding ponds are inspected every other year by PaDEP. Copies of these 3 reports are attached.

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

These holding ponds were not inspected in 2008. They are inspected by PaDEP every other year. The attached PaDEP reports from 2007 indicate no concerns and no violations.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s)? Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

The North LDS Pond (N-LDS) is 3.2 acres, is 32' high, and has 46 acre ft. of capacity as per the methodology in the Enclosure. The present estimated volume of material in this holding pond is 34 acre ft.

The South LDS Pond (S-LDS) is 3.1 acres, is 17' high, and has 42 acre ft. of capacity as per the methodology in the Enclosure. The present estimated volume of material in this holding pond is 42 acre ft.

The West HDS Pond (W-HDS) is 2.9 acres, is 27' high, and has 45 acre ft. of capacity as per the methodology in the Enclosure. The present estimated volume of material in this holding pond is 39 acre ft.

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

There are no known spills from any of these 3 holding ponds.

10. Please identify all current legal owner(s) and operator(s) at the facility.

FirstEnergy Generation Corp.