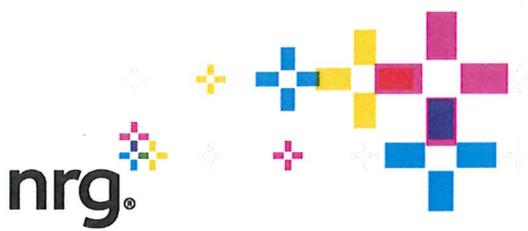


US EPA ARCHIVE DOCUMENT



**NRG Energy**  
121 Champion Way, STE 300  
Canonsburg, PA 15317  
Phone: 724-597-8310

April 11, 2014

**Transmitted via E-mail**

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: **Response to Recommendations**  
Coal Combustion Residue Impoundment Round 12-  
Dam Assessment Report  
GenOn Northeast Management Company –  
Keystone Generating Station  
Shelocta, Pennsylvania

Dear Mr. Hoffman:

As requested in your March 18, 2014 Letter, GenOn Northeast Management Company, a subsidiary of NRG Energy, Inc. (NRG) is providing a summary of measures to address the recommendations identified in the Coal Combustion Residue (CCR) Impoundment Round 12 – Dam Assessment Report for the Keystone Generating Station. According to the report, the recommendations were considered minor because the issues identified did not appear to threaten the structural integrity of the impoundments in the near term.

Based on the findings of the visual assessment and review of the available records for the three bottom ash ponds and thermal pond, Dewberry Consultants LLC recommended the following minor maintenance:

- Control burrowing animals (e.g. ground hogs) and appropriately fill-in burrows in the embankments around the ponds.
- Complete mowing of the embankments just before the quarterly inspections that are conducted during the growing season.

As indicated in our November 25, 2013 e-mail, Keystone initiated a quarterly inspection program for all CCR impoundments. The quarterly inspections will

be preceded by mowing during the growing season to facilitate the inspections. In addition, a contractor was hired to control burrowing animals and fill-in the burrows in the embankments.

The inspection program will be facilitated and tracked using our Intelex environmental, health, safety, and quality management software. The inspection program is generally designed to assess the embankments for signs of:

- Seepage
- Sliding/Movement
- Erosion
- Animal burrowing
- Heavy vegetation.

Please do not hesitate to contact me at (724) 597-8310 if you have any questions or require additional information.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Stephen M. Frank". The signature is fluid and cursive, with a large initial "S" and "F".

Stephen M. Frank, P.E.  
Senior Environmental Specialist

cc: Greg Mitchell, General Manager, Keystone Generating Station