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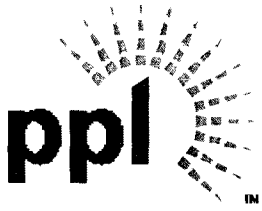


March 26, 2009

Mr. Richard Kinch
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Dr.
5th Floor; N-5783
Arlington, VA 22202 2733

RE: Request for Information Under Section 104 (e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e)

Dear Mr. Kinch:

PPL Generation LLC's Brunner Island Power Station received the EPA's Information Collection Request (ICR) on coal combustion residues (CCR) surface impoundments on March 16, 2009. Attached is PPL Generation's response to the ICR and the associated signed certification statement.

While this facility only has one disposal impoundment for CCRs, we have included other smaller impoundments that received waste waters that have or may have contacted CCRs as was indicated in clarifications on the ICR provided to the Utility Solid Waste Activities Group (USWAG).

As you may know since 1980, Pennsylvania has had Dam Safety Regulations under which certain sized impoundments have been regulated. The disposal impoundments are typically regulated under both the Dam Safety regulations and PA's Residual Waste Regulations. Water treatment basins, on the other hand, are not regulated by Dam Safety due to their smaller size and corresponding limited risk of structural failure but are regulated under PA's Residual Waste Regulations.

If you have any questions or need additional information, please contact Craig Shamory from our Environmental Management Department at 610-774-5653 or csshamory@pplweb.com.

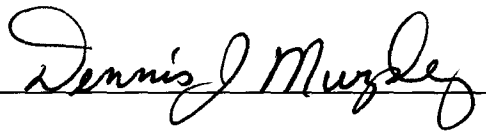
Sincerely,

Dennis J. Murphy

CC:
Craig Shamory PPL, EMD
Brunner Island Station

ICR Letter Certification Statement:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: 

Name: Dennis J. Murphy

Title: VP/COO-Eastern Fossil & Hydro, PPL Generation LLC

PPL response to ICR

Plant Name: Brunner Island SES
Impoundment Name: Ash Basin No. 6

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products form the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion or by-products, but still contain free liquid.

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.

The impoundment is regulated by the Pennsylvania Department of Environmental Protection (DEP), Bureau of Land Recycling and Waste Management. The impoundment operates as a residual waste disposal impoundment under the Pennsylvania Residual Waste Regulations.

This impoundment is classified as a B-3 by the Pennsylvania Department of Environmental Protection, Bureau of Waterways Engineering under PA's Dam Safety Regulations.

> *Class B – storage capacity less than 50,000 acre-ft but greater than 1000 acre-ft. Dam height between 40 and 100 feet.*
>
> *Hazard Classification 3 – no expected loss of life and minimal economic loss.*

2. What year was the management unit commissioned and expanded?

In-service in 1981 and was not 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).

The impoundment contains fly ash, bottom ash, and minor plant wastes such as sediment from the Plant's storage impoundments.

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?

Yes, yes, and yes.

5. When did the company last assess or evaluate the safety (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?

The impoundment is inspected semi-annually by a Plant representative from the environmental department, trained by a PPL professional engineer. An annual inspection is conducted by Devine, Tarbell, and Associates (DTA). The results of DTA's annual inspection in 2008 revealed the need to further evaluate the structural integrity of the impoundment. This study is being conducted by DTA. Adam N. Jones, P.E. of DTA will be the Project Engineer on this work and is a Register Professional Engineer in PA License # PE075739. Results are pending.

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 official inspection report or evaluation.

Officials from the Pennsylvania Department of Environmental Protection inspected the impoundment on January 14, 2009. A copy of their inspection report is attached as Attachment A.

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.

No – see Answer to No. 6.

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 surface area is 70 acres, only 11 acres has free standing water. The rest is filled with ash and soil cover. The total storage capacity of the impoundment is 2600 acre-feet. The volume of waste in the basin is 3,597,515 tons in accordance with the last submittal to the Pennsylvania Department of Environmental Protection on June 30, 2008. The maximum height of the dam is 39 feet.

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).

No known spills or unpermitted releases.

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

PPL Brunner Island, LLC is the legal owner of this impoundment.

PPL response to ICR

Plant Name: Brunner Island SES
Impoundment Name: Equalization Pond

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products form the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion or by-products, but still contain free liquid.

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.

The Equalization Pons is regulated by the Pennsylvania Department of Environmental Protection (DEP), Bureau of Water Quality. The impoundment operates as a residual waste storage impoundment under the Pennsylvania Residual Waste Regulations. The impoundment is too small to be regulated by Pennsylvania's Dam Safety regulations. The impoundment does not have a rating.

Based on the EPA rating the Pond is Less than Low Hazard Potential

2. What year was the management unit commissioned and expanded?

In-service in 1993 and was not 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).

The impoundment collects runoff and incidental plant waste flows that may contain sediment and fly ash.

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?

Yes, yes, and yes.

5. When did the company last assess or evaluate the safety (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?

The impoundment is inspected semi-annually by a Plant representative from the environmental department, trained by a PPL professional engineer. The impoundment was inspected by a Company Professional Engineer most recently on September 11, 2008. The inspection found no significant findings. The next inspection is scheduled for March 2009.

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 official inspection report or evaluation.

The impoundment does not receive a structural integrity inspection by a State or Federal Agency.

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.

No – see Answer to No. 6.

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 surface area is 0.88 acres. The total storage capacity of the impoundment is 4.5 acre-feet. As of 2-28-2009, the current volume of waste in the impoundment is negligible as it does not receive much sediment and is dredged out as needed. The maximum height of the dam is 11 feet.

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).

No known spills or unpermitted releases.

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

PPL Brunner Island, LLC is the legal owner of the impoundment.

PPL response to ICR

Plant Name: Brunner Island SES
Impoundment Name: Industrial Waste Treatment Basin (IWTB)

Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material for the storage or disposal of residuals or by-products form the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. This includes units that no longer receive coal combustion or by-products, but still contain free liquid.

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.

The IWTB is regulated by the Pennsylvania Department of Environmental Protection (DEP), Bureau of Land Recycling and Waste Management. The impoundment operates as a residual waste storage impoundment under the Pennsylvania Residual Waste Regulations. The impoundment is too small to be regulated by Pennsylvania's Dam Safety regulations. The impoundment does not have a rating.

Based on the EPA rating the impoundment is Less than Low Hazard Potential

2. What year was the management unit commissioned and expanded?

In-service in 1973 and was not 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).

The IWTB collects coal pile sediment and water treatment plant sediment (silt from the river) along with some sediment from storm drains, all of which would be classified as other.

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?

Yes, yes, and yes.

5. When did the company last assess or evaluate the safety (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?

The impoundment is inspected semi-annually by a Plant representative from the environmental department, trained by a PPL professional engineer. The impoundment was inspected by a Company Professional Engineer most recently on October 10, 2008. The inspection found no significant findings. The next inspection is scheduled for April 2009.

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 official inspection report or evaluation.

The impoundment does not receive a structural integrity inspection by a State or Federal Agency.

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.

No – see Answer to No. 6.

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 surface area is 7.2 acres. The total storage capacity of the impoundment is 20 acre-feet. As of 2-28-09, the current volume of waste in the impoundment is approximately 2 acre-feet. The maximum height of the dam is 5 feet, measured to top of perimeter dike. (Water depth typically 3 feet.) The impoundment is surrounded by flood control dikes at a higher elevation.

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).

No known spills or unpermitted releases.

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

PPL Brunner Island, LLC is the legal owner of the impoundment.