

US EPA ARCHIVE DOCUMENT

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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 Montour Power Station received the EPA's Information Collection Request (ICR) on coal combustion residues (CCR) surface impoundments on March 12, 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 under 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,

A handwritten signature in black ink that reads "Dennis J. Murphy". The signature is written in a cursive, flowing style.

Dennis J. Murphy

CC:
Craig Shamory PPL, EMD
Montour Station

ICR Letter Certification Statement:

I certify that the information contained in this response to EPA's request for information and any 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: Montour SES

Impoundment Name: Ash Basin No. 1

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 from 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.

Ash Basin No. 1 is regulated by the Pennsylvania Department of Environmental Protection (DEP), Bureau of Land Recycling and Waste Management. Ash Basin No. 1 operates as a residual waste disposal impoundment under the Pennsylvania Residual Waste Regulations.

This impoundment is classified as a B-3 by the DEP, 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 1968 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, mill rejects, detention basin sludge, stormwater basin solids, waste treatment basin solids, river intake sediment, and construction/debris waste.

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 monthly by a Plant representative from the environmental department, trained by a PPL professional engineer. Also, a PPL professional engineer conducts a quarterly inspection. The next inspection is scheduled for June 2009.

Based in part on groundwater monitoring and in part on visual observations, a study was conducted in 2007 under the direction of Ish Inc., to determine the structural integrity of two sections of the basin, one section along the east side and one along the south side. This study recommended buttressing on a portion of the east side and a portion of the south side basin dikes. The buttressing was installed in 2007 and the dike is now within the acceptable slope stability criteria. Alan E. Briggs, P.E. of Key Environmental, Inc. was the Project Engineer on this work and is a Registered Professional Engineer in PA License # 24GE03878500. Currently, a further study is underway by consultants, Devine, Tarbell and Associates (DTA) to evaluate the structural integrity of the inside slopes of subbasin C of the impoundment. Four separate areas of shallow sloughs have been identified on the inside dike in subbasin C. Adam N. Jones, P.E. of DTA is the Project Engineer on this work and is a Registered 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 DEP inspected the impoundment on January 13, 2009 and on February 20, 2009. Copies of the inspection reports are 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 143 acres, less than 25 acres has free standing water. The remainder is filled with ash and soil cover. The total storage capacity of the impoundment is 5070 acre-feet. The volume of waste in the impoundment is 7,739,530 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 40 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).

Minor seeps were identified on the south side of Basin 1 during a DEP inspection in 2004. Subsequent to this inspection, an assessment was completed by Ish, Inc. which recommended abatement actions. The abatement actions are currently being conducted under a Consent Order and Agreement signed in 2007 between PPL and DEP.

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

PPL Montour, LLC is the legal owner of the impoundment.

PPL response to ICR

Plant Name: Montour SES

Impoundment Name: Ash Area 3 Leachate Runoff Basin

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 from 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. The impoundment is too small to be regulated under 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 1980 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 small amounts of stormwater runoff from open portions of Ash Area 3 and leachate from Ash Area 3 and closed Ash Area 2.

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 operation of the impoundment is inspected weekly by a Plant representative with the appropriate environmental training. To date, no corrective actions were identified as needed for this impoundment.

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.

Due to its small size, the impoundment does not receive structural integrity inspections 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 2.2 acres. The total storage capacity of the impoundment is 11 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 10 feet, measured to top of perimeter dike. (Water depth typically 3 feet.) The impoundment was last dredged in May 2007.

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 Montour, LLC is the legal owner of this impoundment.

PPL response to ICR

Plant Name: Montour SES

Impoundment Name: Detention Basin

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 from 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 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 under 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 1968 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 ash basin effluent, coal pile runoff, leachate from closed Ash Area 2 and Ash Area 3, boiler blowdown, condensate drain water, backwash from the water treatment plant, and feed water drainage.

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 quarterly by a Plant representative from the environmental department, trained by a PPL professional engineer. The next inspection is scheduled for June 2009. A structural analysis of the impoundment's dike was completed in 2007 by Ish Inc. that demonstrated the dike to be stable and no remedial action was necessary. Alan E. Briggs, P.E. of Key Environmental, Inc. was the Project Engineer on this work and is a Registered Professional Engineer in PA License # 24GE03878500.

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 structural integrity inspections 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 21 acres. The total storage capacity of the impoundment is 53 acre-feet. As of 2-28-09, the current volume of waste in the impoundment is probably about 10 acre-feet. The maximum height of the dam is 8 feet, measured to top of perimeter dike. (Water depth typically 2-3 feet.) The impoundment was last dredged in November 2008.

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).

Minor seepage was noted from a section of the west side of the berm during a 2004 inspection. This seepage is located at the toe of the berm and is directed to the Storm Water Pond and is discharged under the NPDES permit. In response to this seepage, a structural analysis was conducted of the berm. The conclusion of this analysis is that the berm is structurally competent. Alan E. Briggs, P.E. of Key Environmental, Inc. was the Project Engineer on this work and is a Registered Professional Engineer in PA License # 24GE03878500.

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

PPL Montour LLC is the legal owner of this impoundment.

PPL response to ICR

Plant Name: Montour SES

Impoundment Name: Silo Runoff 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 from 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 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 under 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 1980 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 small amounts of fly ash sediment coming off the dry fly silo area.

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 was last inspected by a Plant representative from the environmental department prior to the dredging in December 2008. The next inspection is scheduled for April 2009. No corrective actions have been identified as a result of these inspections.

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.

Due to its small size, the impoundment does not receive structural integrity inspections 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 0.11 acres. The total storage capacity of the impoundment is 0.5 acre-feet. As of 2-28-09, the current volume of waste in the impoundment is approximately 0.1 acre-feet. The maximum height of the dam is 6 feet, measured to top of perimeter dike. (Water depth typically 3 feet.) The impoundment was last dredged in December 2008

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 Montour LLC is the legal owner of this impoundment.

PPL response to ICR

Plant Name: Montour SES

Impoundment Name: Stormwater Basin

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 from 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 Water Quality management. 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 1968 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 from around the Ash Basin 1 and plant area with the potential for some coal combustion residues to reach the impoundment including minor seepage from Ash Basin 1 and the Detention Basin. Predominantly, the impoundment collects sediment from yard drains that are specifically laid out to collect stormwater not process waters.

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 quarterly by a Plant representative from the environmental department, trained by a PPL professional engineer. The last inspection found no significant findings. The next inspection is scheduled for June 2009. The impoundment is nearly all incised. A structural analysis of the impoundment has not been completed.

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 structural integrity inspections 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 1.8 acres. The total storage capacity of the impoundment is 12.6 acre-feet. As of 2-28-09, the current volume of waste in the impoundment is approximately less than 1 acre-feet. The maximum height of the inside slope is 7 feet, measured to top of embankment. (Water depth typically about 2 feet.) The impoundment was last dredged in 2007.

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 Montour, LLC is the legal owner of this impoundment.