

US EPA ARCHIVE DOCUMENT

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**TRANSMITTAL VIA E-MAIL**

April 12, 2013

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
[hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov)

Dear Mr. Hoffman:

We have reviewed the December 20, 2012 Brunner Island Ash Basin No. 6 inspection report completed by GZA on behalf of the Environmental Protection Agency (EPA) based on the May 18, 2011 inspection. Our responses are indicated below in ***bold italics*** to the recommendation in the EPA's inspection report.

Studies and Analyses:

1. Investigate cause of spongy/soft ground observed at the east embankment.  
***Response: PPL's geotechnical consultant, HDR, noted in an October 2012 report on their inspection of the basin that portions of the east embankment toe at times have been wet since at least 2009. However, they stated that there is no evidence of material transport or quick conditions. The report suggests that observed wetness may be in part the result of isolated permeable layers in the dike. Further, PPL's review of historical observations of the embankment has noted seasonal variations in the wet areas suggesting a relationship to rainfall events and runoff from the slope face. PPL believes that the trends of observations do not suggest a worsening problem or an unstable condition and does not plan to undertake study of the east embankment area unless observations indicate a worsening condition. PPL will continue to monitor these areas monthly.***

Operations and Maintenance Activities:

1. Maintain grass cover on the downstream slope and approximately 15 feet beyond the toe area. USACE recommends vegetation be kept less than 12 inches in height on embankments. This may require mowing more frequently than bi-annually.  
***Response: PPL will continue to schedule mowing of the dike and toe areas to stay ahead of the seasonal vegetation growth, and will coordinate the mowing schedule with the dam inspection schedule.***

2. Fill ruts, depressions, and animal burrows and reseed if necessary.

**Response:** *PPL has scheduled and has contracts in place to complete the repairs of identified ruts and depressions by June 30, 2013. An on-going effort is underway to remove the groundhogs prior to backfilling the burrows. PPL has an agreement in place with a pest control contractor for animal removal.*

3. Monitor and repair sloughing at the inside slope at the Polishing Pond and outside slope at the east embankment, or other locations sloughing is observed.

**Response:** *PPL will continue to monitor the areas and has scheduled the repairs to the sloughing on the outside slope of the east embankment to be completed by June 30, 2013 along with the above mentioned ruts and depressions. Areas of concern inside the Polishing Pond were previously repaired after GZA's May 2011 inspection.*

4. Exercise stoplogs and slide gates at least once annually.

**Response:** *PPL will continue to annually exercise the slide gates and visually inspect the concrete stoplogs.*

5. Monitor spongy/soft ground observed at the east embankment.

**Response:** *PPL will continue to monitor the area along with the rest of the dam on a monthly basis.*

#### Minor Repairs:

1. Repair sloughs and scarps on the embankment and provide future erosion protection as necessary.

**Response:** *PPL has a contract in place to repair of the sloughs and scarps, and plans to provide mulching or temporary matting for erosion control until vegetation has been established. As noted above, this work is scheduled for completion by June 30, 2013.*

#### Remedial Measures:

1. In conjunction with the results of the updated hydrologic and hydraulic analyses, make provisions for an emergency overflow spillway.

**Response:** *As part of the basin closure design, PPL plans to remove the spillway control structures using clay-lined and riprap armored channel to discharge storm water from within the basin. Prior to basin closure during an extreme flood, PPL will follow the Plant Flood Emergency Plan to stop flow to the basin and provide daily monitoring.*

If you have any questions with our response, please feel free to contact me at the 610-393-8176.

Sincerely,



Craig S. Shamory

CC:

Brian Alder, PPL Brunner Island  
Benjamin Wilburn, PPL GTS