

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

March 13, 2013

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL

Mr. Craig Shamory  
PPL Generation  
Two North Ninth Street  
Allentown, Pa. 18101-1179

Re: Request for Action Plan regarding PPL Generation, LLC's – PPL Brunner Island Power Station

Dear Mr. Shamory,

On May 18, 2011 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the PPL Generation, LLC's – PPL Brunner Island Power Station facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the PPL Generation, LLC's – PPL Brunner Island Power Station facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the PPL Generation, LLC's – PPL Brunner Island Power Station facility can be accessed at the secured link below. The secured link will expire in 60 days.

Here is the link: <http://www.yousendit.com/download/UVJqV295Tk1wcFY3czlVag>

This report includes a specific condition rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the PPL Generation, LLC's – PPL Brunner Island Power Station facility. These recommendations are listed in Enclosure 1.

Since these recommendations relate to actions which could affect the structural stability of the CCR management unit(s) and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please provide a rationale. Please provide a response to this request by **April 15, 2013**. Please send your response to:

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

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Drive  
5<sup>th</sup> Floor, N-5838  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov), [dufficy.craig@epa.gov](mailto:dufficy.craig@epa.gov), [kelly.patrickm@epa.gov](mailto:kelly.patrickm@epa.gov) and [englander.jana@epa.gov](mailto:englander.jana@epa.gov).

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as “confidential” you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued efforts to ensure protection of human health and the environment.

Sincerely,  
/Suzanne Rudzinski/, Director  
Office of Resource Conservation and Recovery

Enclosure

## Enclosure 1

**PPL Generation, LLC's – PPL Brunner Island Power Station Recommendations  
(from the final assessment report)****CONCLUSIONS****The following deficiencies were noted at the CCW impoundment, Ash Basin No. 6:**

1. Overgrown vegetation, up to 36 inches high, at outside embankment slopes and portions of inside embankment slopes. Overgrown vegetation may obscure potential detrimental embankment conditions.
2. Ruts and depressions observed at portions of the embankment toe from vehicles.
3. Saturated portions of embankment and standing water observed at the toe of dam at various locations around the Polishing Pond and east embankment. Conditions possibly due to heavy rainfall over the prior week. According to PPL personnel waters of the Susquehanna River had recently receded from the areas surrounding the toe of the embankment, which may also have contributed to the standing water and saturated conditions.
4. Sloughing observed at inside slope of the Polishing Pond, especially near the water line at the east side. Sloughs and scarps observed generally less than 3 feet deep.
5. Erosion from surface water runoff observed at the inside face of the Polishing Pond near the north end.
6. Approximately 40 foot long section of spongy/soft soil observed the east embankment near the south side from the toe to approximately 1/3 the height of the embankment. Note this condition was also reported on previous inspection reports by HDR Engineering, Inc.
7. Minor depressions and erosion observed at the crest.
8. 10 to 15 foot wide slough/scarp at the east embankment approximately 75 feet south of the access stairway on the outside face.
9. Large stock pile of top soil adjacent to the west embankment slope just north of the electric wire stanchion, possibly surcharging the embankment.

**RECOMMENDATIONS****Studies and Analyses:**

1. Investigate cause of spongy/soft ground observed at the east embankment.

**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.
2. Fill ruts, depressions, and animal burrows and reseed if necessary.
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.
4. Exercise stoplogs and slide gates at least once annually.
5. Monitor spongy/soft ground observed at the east embankment.

**Minor Repairs:**

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

**Remedial Measures:**

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

It should be noted that during the over the 12 months time since the filing our Draft Report and receipt of comments from the EPA thereon, it is GZA's understanding that PPL is still in the process of taking steps to permanently close the Basin. According to the comments received on our Draft Report, GZA understands that PPL will be submitting closure plan permit applications to PADEP very shortly and will commence dewatering once they have the necessary PADEP approval. In the interim, GZA's opinion is that it would be prudent for PPL to at least implement the above recommended Operations and Maintenance and Minor Repair Recommendations. We acknowledge that implementation of some of the above studies and analyses and remedial measures recommendations may not be critical given the current permanent closure plans. However in keeping with good engineering practice and as recommended in HDR's October 30 2012 memorandum, it would be expected that deficiencies regarding the embankments (if any) would be appropriately addressed in the closure plan if the dikes are to remain unbreached in the permanently closed condition.