

US EPA ARCHIVE DOCUMENT



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

January 7, 2011

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Ms. Jeffery Specht, Plant Manager  
Sunbury Generation LP  
P.O. Box 517  
Old Train Road  
Shamokin Dam, Pa. 17876

Dear Mr. Specht,

On May 10-11, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the WPS Sunbury Generating Station. 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 WPS Sunbury Generating Station 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 WPS Sunbury Generating Station is enclosed. This report includes a specific 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 WPS Sunbury Generating Station. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units 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 explain why. Please provide a response to this request by February 7, 2011. Please send your response to:

Mr. Stephen Hoffman  
US 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  
US Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Drive  
5<sup>th</sup> Floor, N-237  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@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 ongoing efforts to ensure protection of human health and the environment.

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

Enclosures

Enclosure 2  
WPS Sunbury Generating Station Recommendations

Based on the findings of our visual inspection and review of the available records for the Residual Waste Ash Basin No. 1, O'Brien & Gere recommends Sunbury Generation LP work with the PADEP, Division of Dam Safety to develop a plan for dealing with the trees and woody vegetation growth from the embankments. The trees on the east embankment provide stability and protection from Susquehanna River flood waters. These benefits will have to be weighed against the documented threats to dam safety associated with the growth of trees on dams embankments. There is, however, water impounded against the south embankment and that embankment should be maintained consistent with conventional dam safety practices, including the removal of woody vegetation. O'Brien & Gere also recommends Sunbury Generation LP work with the PADEP, Division of Dam Safety to bring the Basin into compliance with current state regulations.

### **6.1. URGENT ACTION ITEMS**

None of the recommendations are considered to be urgent, since the issues noted above do not appear to threaten the structural integrity of the dam in the near term.

### **6.2. LONG TERM IMPROVEMENT**

The deficient conditions observed during the inspection do not require immediate attention, but should be implemented in the near future as part of a regular maintenance plan. The recommended maintenance/improvement actions are provided below:

- Under the guidance of the PADEP, Division of Dam Safety, remove selected trees and woody vegetation from the embankments. Conduct a dam breach analysis to determine the extent of inundation to the cottage community located near the southeast embankment. The results of the breach analysis can be used to establish/confirm the hazard classification.
- A formal spillway capacity analysis should be conducted based on the regulatory flood event.
- Updated slope stability analyses should be performed to include evaluation of the maximum surcharge pool loading condition.
- Plan for a regular (annual) inspection by a PE with dam safety experience, including an inspection following removal of the trees from the embankment slopes.
- Work with the PADEP, Division of Dam Safety to bring the Basin into compliance with current state dam safety regulations including preparation of an Emergency Action Plan and Operations and Maintenance Plan, as required.

### **6.3. MONITORING AND FUTURE INSPECTION**

O'Brien & Gere recommends that Sunbury Generation LP continue the schedule of quarterly inspections while it works with PADEP, Division of Dam Safety to develop an Operations and Monitoring Plan. Consideration should also be given to independent inspections by licensed dam safety engineers on at least a biennial basis.

### **6.4. TIME FRAME FOR COMPLETION OF REPAIRS/IMPROVEMENTS**

We recommend that Sunbury Generation LP contact the PADEP, Division of Dam Safety and develop a plan to remove the vegetation, perform the necessary engineering evaluations, conduct a spillway evaluation and slope stability analyses and complete other acquired documentation for compliance with Pennsylvania Dam Regulations by the end of 2010. The completion date for the repairs and engineering documents should be determined by the PADEP, Division of Dam Safety.