

US EPA ARCHIVE DOCUMENT

*Via Email*

April 18, 2013

Mr. Stephen Hoffman  
US Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

***Re: Hunlock Power Station***

UGI Development Company (“UGID”) is in receipt of the United States Environmental Protection Agency’s (“EPA”) March 13, 2013 letter responding to UGID’s comments regarding the draft report evaluating structural stability of the coal combustion residual (“CCR”) impoundments located at the Hunlock Power Station facility. We interpret the recommendations provided in Enclosure 1 to essentially be waived if UGID is able to timely receive approval on its Final Closure Plan currently under review with the Pennsylvania Department of Environmental Protection (“PADEP”). UGID expects to receive PADEP approval within the next few months. Alternatively, if such approval is not timely received, UGID acknowledges and understands that the EPA will require that the recommendations be implemented. With that understanding, UGID takes this opportunity to apprise the EPA of the current activities at the Hunlock Power Station.

As you may recall, in May 2011 the Hunlock Power Station coal plant ceased operations and the placement of coal ash into the CCR’s impoundments. Shortly thereafter, UGID began to excavate and dispose of the fly ash from the CCR impoundments. This process was conducted in accordance with a beneficial reuse permit approved by The PADEP. Coal ash excavation activities were completed on October 24, 2012 and approximately 382,000 tons of material was transported and disposed offsite for beneficial use. Upon completion of excavation activities, the clay liner was observed in each of the basins.

The Final Closure Plan for the CCR impoundments includes restoration grading, soil compaction, topsoil placement and vegetation procedures. UGID has implemented an ongoing maintenance program that is tailored to the current state of the impoundments. Notably, UGID has implemented measures that meet with what it believes to be the intent of the recommendations provided in Enclosure 1, but have been modified based on the current status of the impoundments.

1. UGID monitors and repairs ruts and animal burrows in the vicinity of the former CCR impoundments.
2. UGID continuously monitors water that collects in the basins. Collected water is pumped on a routine basis and removed from the former impoundments. As part of this process, UGID did discover that the bottom of the basin is at an elevation of approximately 510 feet versus the original 531.8 feet referenced in the Final Closure Plan. That level was the approximate original water level when the ash impoundments were in operation. With the new level, there is virtually no structural loading from ponding water. Additionally,

UGID continues to measure the monitoring wells for water level and quality on a quarterly basis in accordance with the PADEP.

3. In accordance with the Final Closure Plan, the entire impoundment area is in the process of being appropriately re-graded and stabilized.
4. Likewise, vegetation management and control is being routinely performed.
5. UGID does not run any impoundment discharge water through sediment traps and it does monitor the water quality in accordance with the facility NPDES permit.

In conclusion, UGID has successfully excavated and disposed of all of the coal ash located in the former CCR impoundments in accordance with the PADEP approved beneficial use permit and the Final Closure Plan. The restoration activities are currently being conducted as provided for in the Final Close Plan and the remedial and repair measures for Recurrent Operation and Maintenance Activities are also being completed. Based on the status of the Hunlock Power Station CCR impoundment decommissioning activities, there is no potential impoundment failure threat.

UGID welcomes an opportunity to address any further questions or comments related to these activities and would be agreeable to meet with you or a designee on site at your convenience to review the status of our ash impoundment closure activities. Thank you for providing UGID an opportunity to respond to the recommendations in the March 13<sup>th</sup> letter.

Sincerely,



Michelle A. Bimson  
Counsel