

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on Edison International – Homer City Generating Station, Homer City, PA
Round 10 Draft Assessment Report

To: File

Date: May 10, 2012

1. Please replace "inspection" with "assessment" globally in the report.
2. On p. iv and p. 12 for section 3.5, the report states: "**Remedial Measures Recommendations**, Make provisions to address any deficiencies identified by the above recommended seepage analyses." Please add "and stability" after "seepage."
3. In each section (2.1.2, 2.1.3, 2.1.4, and 2.1.5) please correct the following statement: "Wastewater **exists the Pond** via percolation to the under drain system and through a skimmer and baffled weir structure into a wet well similar to the other Ponds."
4. Section 2.5 indicates that "No hydrologic or hydraulic data was available for review by GZA at the time of this inspection." The need for this ought to be included in the list of recommendations. The lack of this data also falls under the rationale for a condition rating of "poor" and should be noted as a General Deficiency. This comment applies to all related sections pertaining to contractor noted deficiencies of the facility as well as necessary utility actions to be taken. See Section 3.2 "Studies and Analyses" as comment applies.
5. In the "Figures" appendix, Figure 2 "Ortho-Photo Locus Map Coal Combustion Surface Impoundments," it may be advantageous, if possible given the scale of the aerial photo, to highlight with a colored line the perimeter of respective hydrologic units, It is somewhat difficult to discern the perimeter of units from the callouts bubbles.
6. Please insert the checklists for the four ash recycling units ahead of the ten units that were not assessed.
7. Please insert the photos for the four ash recycling units ahead of the ten units that were not assessed.
8. It is requested that either in Appendix C- the checklist, or in section 1.2 there be a specific statement made to address the following question: "Is any part of the impoundment built over wet ash, slag, or other unsuitable materials (like TVA)?" Please correct for each of the four assessed impoundments.

Pennsylvania Department of Environmental Protection's Division of Dam Safety
Comments On:

Draft Report – Round 10 Dam Assessment

Homer City Generating Station

Homer City, Pennsylvania

Report has been prepared for the U.S. Environmental Protection Agency, Washington, D.C. by GZA GeoEnvironmental, Inc. (GZA).

Comments per Section of the Report:

Executive Summary

Pennsylvania Department of Environmental Protection's Division of Dam Safety (DDS) concurs with the deficiencies described by GZA for the structures inspected on May 16, 2011. The observations and deficiencies noted for the four of the fourteen dams investigated by GZA contract seem appropriate. The list of general deficiencies, operation and maintenance recommendations, and minor repair recommendations is complete and thorough.

It should be noted that the concurrence of DDS corresponds to statements made about dam embankment structures and related appurtenances only and not for observations made concerning other features of the power plant.

1.0 Description of Project

1.2.6 Size Classification

The size of the four dams investigated by GZA does not meet the minimum size requirements to be considered regulated as a dam by DDS regulations. The second paragraph states that DDS would classify the recycle ponds as **Class C** structures. While the size of the structure does satisfy the C Size Category for regulated dams, DDS would not classify these dams and would simply state that the dams are **non-jurisdictional**. This matter is also mentioned in the last sentence which states that the PADEP does not regulate the Ash Recycle Ponds as dams. It is important to note that DDS does consider these structures to be dams; however, DDS does not regulate these impoundments because they do not meet the size requirements for jurisdictional dams. Larger dams of the same purpose would be regulated.

1.2.7 Hazard Potential Classification

As in the previous comment, the final sentence states the PADEP does not regulate the Ash Recycle Ponds as dams. DDS does not rate the hazard potential for dams not meeting the size requirements for regulated dams.

2.0 Inspection

DDS concurs with the observations reported by GZA for the structures. The inspection report thoroughly documents the conditions on the date of the inspection and DDS has no further comments to add.

3.0 Assessments and Recommendations

Again, DDS concurs with GZA's recommendations regarding operation, maintenance, repair and other remedial measures.

GZA classifies the Ash Recycle Ponds 1 through 4 as Low Hazard Structures under the Environmental Protection Agency's hazard rating criteria. This is based on the fact that all of the ponds are relatively small in size and that if there was a failure, no loss of life would be expected and any environmental or economic damage due to failure would be minimal. Although the ponds are considered as Low hazard, it should be noted that they have been given a poor condition rating. These condition rating were based on both visual inspection and the fact that no geotechnical information was available for the structures.

PADEP Action

DDS proposes no action because for the structures of interest, DDS has completed a jurisdictional determination for the dams and has determined that the four dams are considered "non-jurisdictional." Of the other 10 dams inspected on May 16-17, 2011, but not reported on, several are considered jurisdiction by DDS. DDS will continue to inspect and monitor these dams at the rate established by DDS regulations.



**EME HOMER CITY
GENERATION L.P.**

An EDISON INTERNATIONALSM Company

1750 Power Plant Road
Homer City, PA 15748

June 25, 2012

Mr. Stephen Hoffman
Senior Environmental Scientist
Office of Solid Waste
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**RE: Draft Report Round 10 Dam Assessment – May 16, 2011 EME Homer City
Generating Station L.P., Homer City Generating Station Ash Disposal Site
Ponds, Coal Refuse Site Ponds and Ash Recycle Ponds
Homer City, Pennsylvania**

Dear Mr. Hoffman,

This letter is being provided in response to the correspondence received from Jana Englander on May 29, 2012 requesting comments on the above referenced draft report prepared by GZA GeoEnvironmental, Inc. (GZA). On May 16, 2011 GZA, under contract to the US Environmental Protection Agency (EPA), inspected fourteen ponds four of which included Ash Recycle Ponds (ARPs) 1 through 4 at the Homer City Generating Station. Their draft assessment report dated March 12, 2012 identified a number of deficiencies and recommended a number of actions and remedial measures be undertaken. Out of the fourteen ponds inspected GZA only recommended follow up actions be taken at the four Ash Recycle Ponds.

EPA should be aware that in response to the recent decision to upgrade the facility and install a Flue Gas Desulfurization (FGD) system to Units 1 and 2 resulting in the permanent closure of ARPs 1 through 4. The ARPs are being replaced by a closed loop ash handling system. This system consists of above ground steel tanks and is designed to settle the coal combustion byproducts and recycle the water back to the head of the ash system. This system eliminates the wastewater stream that is currently conveyed to the ARPs thereby eliminating the need for the ponds in the future. Construction of the Ash Handling System is currently underway and is scheduled to be in completed in September of 2012.

A Closure Plan for the ARPs was submitted and approved by Pennsylvania Department of Environmental Protection (PADEP). A copy of the PADEP closure plan approval is enclosed with this letter. Ash Ponds 1 and 2 have already been successfully closed in order

to begin construction of the FGD system and a copy of the closure certification for these ponds is also enclosed. Ash Ponds 3 and 4 are scheduled to be closed in October 2012.

As a result of the ARP closure activities, EME Homer City believes that the recommendations cited in the above referenced report are no longer applicable and no further actions other than those described in the approved Closure Plan are required.

We appreciate the opportunity to comment on the above referenced draft report. If you have any questions or would like to discuss, please do not hesitate to contact me at 724-479-6255.

Regards,

Gary R. Cline

Gary Cline
Environmental Manager
EME Homer City Generation, L.P.

Enclosures:

Ash Pond Closure Plan Approval
Ash Pond Closure Certification, Ponds 1 & 2

cc: Jeffrey Bard, EME
William Ahlert, HDR



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST REGIONAL OFFICE

RECEIVED

DEC 11 2011

HDR Engineering
Pittsburgh

December 9, 2011

Joseph R. Stanek
EME Homer City Generation, LP
1750 Power Plant Road
Homer City, PA 15748-9558

Re: Closure Plan - Ash Recycle Ponds
Homer City Generating Station
EME Homer City Generation, LP
Center Township
Indiana County
WQM Part II No. 3281205
APS No. 37090
Authorization No. 900960

Dear Mr. Stanek:

The Department of Environmental Protection (DEP) has completed its technical review of the revised plan prepared on behalf of EME Homer City Generation, L.P. (EME) by HDR Engineering, Inc. that was submitted on December 2, 2011 for closure of the four Ash Recycle Ponds located at the Homer City Generating Station in Center Township, Indiana County. Based on that review, DEP concludes that the revised closure plan conforms to the requirements of 25 Pa. Code Section 289.312, incorporated by reference at 25 Pa. Code Section 299.144(a)(7). Approval of the Ash Recycle Pond Closure Plan is hereby granted with the following stipulations:

- DEP's approval of the Ash Recycle Pond Closure Plan is granted pursuant to 25 Pa. Code Section 299.144(a)(7). Implementation of the approved plan shall not be construed as fulfilling the requirements for remediation under the Pennsylvania Land Recycling and Environmental Standards Act.
- Upon completion of each phase of Ash Recycle Pond closure, EME shall submit a certification report pursuant to 25 Pa. Code Section 289.312, incorporated by reference at 25 Pa. Code Section 299.144(a)(1). Each certification report shall minimally contain a completed DEP Form 19R bearing the signature and seal of a Professional Engineer registered in the Commonwealth, a narrative account of the activities conducted to effectuate closure, copies of all laboratory reports of soil sample analyses, and any photographs, logs, reports or other pertinent information required to fully document that closure was conducted in accordance with the approved plan.
- A Form 14R - Residual Waste Landfill Quarterly and Annual Water Quality Analyses Report must be submitted to the Department relative to the quarterly parameters and total concentrations for each of the following: arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, silver and zinc on a calendar quarterly basis beginning with the first calendar quarter after certification of the closure of Ash Ponds 3 and 4 and continuing for a minimum of eight consecutive quarters for groundwater Monitoring Wells MP-5, MP-9, MP-10 and MP-26 at the

400 Waterfront Drive, Pittsburgh, PA 15222-4745

412.442.4000 FAX: 412.442.4194

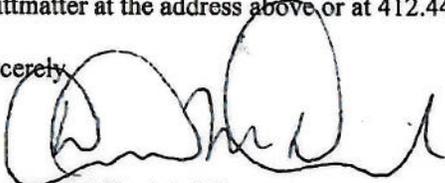
Printed on Recycled Paper

www.dep.state.pa.us

Homer City Generating Station. EME may request approval to forego further monitoring of the designated wells after eight consecutive quarters based an analysis of the collected data demonstrating that further monitoring is not required.

If you have any questions or require additional information regarding this approval, please contact Denis Strittmatter at the address above or at 412.442.5800.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane D. McDaniel". The signature is fluid and cursive, with a large loop at the beginning and a long tail extending to the right.

Diane D. McDaniel, P.E.
Environmental Engineering Manager
Waste Management

cc: ✓HDR Engineering, Inc.



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST REGIONAL OFFICE

May 4, 2012

RECEIVED

MAY 09 2012

HDR Engineering, Inc.
Pittsburgh, PA

Joseph R. Stanek
EME Homer City Generation, LP
1750 Power Plant Road
Homer City, PA 15748-9558

RE: Ash Recycle Pond Closure Certification
Homer City Generating Station
EME Homer City Generation, LP
Center Township
Indiana County
WQM Part II No. 3281205
APS No. 37090
Authorization No. 925449

Dear Mr. Stanek:

The Department of Environmental Protection (DEP) has completed its technical review of the Construction Certification Report prepared on behalf of EME Homer City Generation, L.P. (EME) by HDR Engineering, Inc. that was submitted on April 27, 2012 for closure of Ash Recycle Pond Nos. 1 and 2 located at the Homer City Generating Station in Center Township, Indiana County. That document was reviewed to confirm that the construction activities described therein conformed to the closure plan approved by DEP on December 9, 2011. Based on that review, DEP determines that the referenced document satisfies the requirement of 25 Pa. Code Section 299.144(a)(1) and is otherwise acceptable. DEP hereby approves the referenced construction certification report. This approval does not constitute final closure certification as described in 25 Pa. Code Section 287.342.

If you have any questions or require additional information regarding this approval, please contact Denis Strittmatter at the address above or at 412.442.5800.

Sincerely,

Diane D. McDaniel, PE
Environmental Engineering Manager
Bureau of Waste Management

cc: HDR Engineering, Inc. ✓