

## Frank, Stephen

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**From:** Frank, Stephen  
**Sent:** Friday, April 09, 2021 9:06 AM  
**To:** Tarquino Morris, Ali; Svitek, Sharon (ssvitek@pa.gov)  
**Cc:** McGraw, William P.; Schmidt, Keith A  
**Subject:** Federal CCR Notification - Notice of Completion of Closure - 40 CFR 257.102(h)  
**Attachments:** Completion\_of\_Closure\_Notice.pdf

Tracking:	Recipient	Delivery	Read
	Tarquino Morris, Ali		
	Svitek, Sharon (ssvitek@pa.gov)		
	McGraw, William P.	Delivered: 4/9/2021 9:06 AM	Read: 4/9/2021 9:16 AM
	Schmidt, Keith A	Delivered: 4/9/2021 9:06 AM	

Hi Sharon,

Pursuant to EPA's CCR Rule at 40 CFR Part §257.102(h), §257.105(i)(8) and §257.106(i)(8), GenOn Power Midwest LP is providing notice that we have completed closure by removal of CCR of the Bottom Ash Emergency Pond (#0272216) and Bottom Ash Recycle Pond (#0272216) located at the Cheswick Generating Station. This notice includes the attached certification by a qualified professional engineer as required by §257.102(f)(3).

Per the requirements of §257.107(i)(8), this notice will be available within 30 days (May 9) on our public website: <https://www.genon.com/ccr-rulecompliance/>.

Should you require additional information or if you would prefer to have these notices provided to other contacts at the Department, please do not hesitate to contact us.

Thank you, Steve



**Stephen M. Frank, PE (Pa)**  
Senior Manager, Environmental  
[Stephen.Frank@GenOn.com](mailto:Stephen.Frank@GenOn.com)  
724-249-3610

**From:** [Microsoft Outlook](#)  
**To:** [Tarquino Morris, Ali](#); [Svitek, Sharon \(ssvitek@pa.gov\)](#)  
**Subject:** Relayed: Federal CCR Notification - Notice of Completion of Closure - 40 CFR 257.102(h)  
**Date:** Friday, April 09, 2021 9:06:07 AM  
**Attachments:** [Federal CCR Notification - Notice of Completion of Closure - 40 CFR 257.102\(h\).msg](#)

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Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:  
Tarquino Morris, Ali (altarquino@pa.gov) <mailto:altarquino@pa.gov>  
Svitek, Sharon (ssvitek@pa.gov) (ssvitek@pa.gov) <mailto:ssvitek@pa.gov>  
Subject: Federal CCR Notification - Notice of Completion of Closure - 40 CFR 257.102(h)



# Coal Combustion Residuals Closure Certification Report

GenOn Power Midwest LP  
Cheswick Generating Station  
Bottom Ash Ponds Closure  
Springdale Borough, Allegheny County, Pennsylvania

GAI Project R200201.00  
April 2021



Prepared by: GAI Consultants, Inc.  
Pittsburgh Office  
385 East Waterfront Drive  
Homestead, Pennsylvania 15120-5005

Prepared for: GenOn Power Midwest LP  
P.O. Box 65  
Cheswick, Pennsylvania 15024-0065

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## 1.0 Introduction

GenOn Power Midwest LP (GenOn) operates the Cheswick Generating Station (Station) located in Springdale Borough, Allegheny County, Pennsylvania. The Station previously utilized the Bottom Ash Recycle Pond and Emergency Ash Pond (Bottom Ash Ponds, or Ponds) for management of bottom ash coal combustion residuals (CCR). The Ponds are designated as regulated impoundments under the United States Environmental Protection Agency's CCR Rule, 40 Code of Federal Regulations (CFR) §257.

A Closure Plan for the Ponds was developed by Civil and Environmental Consultants, Inc. in October 2016 to meet requirements for existing CCR impoundments in §257.102. The Closure Plan is posted on GenOn's public website: <https://www.genon.com/ccr-rule-compliance>

Between November 2020 and March 2021, all significant quantities of CCR were removed from the Bottom Ash Ponds for closure of the Ponds in accordance with §257.102(c) of the CCR Rule, which states:

*“Closure by removal of CCR. An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV of this part.”*

This report has been prepared to document the closure activities and provide certification from a qualified professional engineer that closure of the Bottom Ash Ponds has been successfully completed, per §257.102(f)(3).

## 2.0 Bottom Ash Ponds Overview

The Ponds are located near 100 Pittsburgh Street, Springdale, Pennsylvania 15144. Previously, bottom ash was wet-sluciced to two hydrobins located across Pittsburgh Street from the main Station area. The bottom ash collected in the hydrobins was trucked to the Cheswick Ash Disposal Facility, while discharge water from the hydrobins containing suspended particles of bottom ash was conveyed to the two surface impoundments, the Bottom Ash Recycle Pond and the Emergency Ash Pond, for settling. The Ponds were used for temporary storage of bottom ash in accordance with residual waste rules and were cleaned annually to retain settling capacity. Fly ash and flue-gas scrubber sludge were not managed in the Ponds.

### 2.1 Bottom Ash Recycle Pond

The Bottom Ash Recycle Pond is located within the northwest corner of the Station. The Bottom Ash Recycle Pond commenced operations in 1970. It consists of an approximately 0.6-acre impoundment that is incised on the west and north sides with earth dikes forming the eastern and southern perimeter. Tawney Run borders the access road along the eastern dike. A concrete stilling basin is located on the south end of the impoundment.

The crest is at approximately EL 779 feet above mean sea level. The pond bottom (as indicated by plant record drawings) is at approximately EL 769.6. The inboard embankment slopes have an inclination of approximately 2H:1V. Diked embankments on the west and north sides vary in height from one to two feet to provide vehicle access drives. The east embankment is 11.7 feet at its maximum height with an outboard slope of approximately 1.5H:1V.

### 2.2 Emergency Ash Pond

The Emergency Ash Pond is located adjacent to the south side of the Bottom Ash Recycle Pond. It consists of an approximately 0.4-acre impoundment that is incised on the west side with earth dikes forming the eastern and southern perimeter. The north side is adjacent to the Stilling Basin. Tawney Run borders the access road along the eastern dike.

The crest is at approximately EL 779 feet above mean sea level. The pond bottom (as indicated by plant record drawings) varies from EL 763.5 to EL 763.8. The inboard embankment slopes have an inclination of approximately 2H:1V. Diked embankments on the west and north sides vary in height from one to two feet to provide vehicle access drives. The east embankment is 14 feet at its maximum height with an outboard slope of approximately 1.5H:1V. The south embankment is 10 feet at its maximum height with an outboard slope of approximately 2H:1V.

### 3.0 Description of Completed Closure Activities

Per the requirements of §257.102(b)(1)-(2), a Closure Plan was developed for the Bottom Ash Ponds in October 2016 and is posted on the publicly available website: <https://www.genon.com/ccr-rule-compliance>. Closure by removal was completed in accordance with §257.102(c) and the October 2016 Closure Plan. All closure activities were completed within five years of commencing closure construction, per §257.102(f)(1)(ii), and included dewatering, excavation, and removal of CCR.

GenOn prepared a “Notification of Intent to Close” for the Bottom Ash Ponds on March 13, 2020 to comply with the requirements of §257.102(g). This correspondence was subsequently placed into the Station’s operating record per §257.105(i)(7), noticed to the State Director per §257.106(i)(7) and posted to the publicly accessible website per §257.107(i)(7).

Pond cleaning activities began in November 2020. To support the cleaning and subsequent closure, the pond was dewatered in accordance with National Pollutant Discharge Elimination System Permit No. PA0001627, including management and discharge of standing water via permitted Outfalls 203 and 303.

CCR in the Ponds was then dewatered and removed using the same methods used to dredge the Ponds as part of operational maintenance. All significant quantities of CCR were removed from the pond base and sideslopes with an excavator and loaded onto trucks that were staged on the western access road and hauled to the Cheswick Ash Disposal Site (Landfill) for disposal. Generally accepted good engineering practices for dewatering and excavation slope stability were utilized throughout the entirety of the construction project. Photographs documenting the progression of the CCR removal activities are included in Appendix A of this report.

CCR was removed from all inlet piping and associated structures. Excavation of CCR materials continued until the clay liner was visible and until CCR was no longer visible. All excavated CCR material was placed in the Cheswick Ash Disposal Site, with cleaning/removal activities completed on March 24, 2021.



## 4.0 Site Inspection by a Professional Engineer

John R. Klamut, a qualified professional engineer licensed in the Commonwealth of Pennsylvania, visited the facility on March 24, 2021 to inspect the Ponds. Activities undertaken by GenOn to support the closure were discussed, and photographic documentation of the work performed was reviewed. A comprehensive walk was conducted along the pond's sideslopes, base, and perimeter. The ponds inlet and outlet structures were removed or CCR material was removed from them and they were left in place. CCR material was observed to be removed and appropriately disposed within the Cheswick Ash Disposal Site. All appropriate elements outlined in the Closure Plan were acknowledged as complete, except the pond was not breached to drain per the original closure plan. The impoundments will be breached at a later date in accordance with state and local permit requirements. Groundwater aspects required for closure are discussed in Section 5.0.

## 5.0 Compliance with Groundwater Protection Standards

Per §257.102(c), closure of a CCR impoundment is not deemed complete until groundwater monitoring concentrations associated with the unit do not exceed the groundwater protection standards (GWPSs) established pursuant to §257.95(h) for Appendix IV constituents.

The Ponds have a groundwater monitoring network which is comprised of four wells, including one upgradient location (Well MW-8) and three downgradient locations (Wells MW-9, MW-10, MW-11). A CCR Groundwater Monitoring Wells Location Map is included in the Annual Groundwater Reports for the Station posted on GenOn's publicly available website: <https://www.genon.com/ccr-rule-compliance>

For Calendar Year 2019, the Bottom Ash Ponds continued in the CCR Assessment Monitoring Program following their transition in April 2018. Accordingly, samples were collected and analyzed for Appendix IV constituents as required, including the annual evaluation of the full list of Appendix IV parameters. None of the Appendix IV constituents were measured at concentrations representing a statistically significant level (SSL) above the corresponding site-specific GWPSs.

For Calendar Year 2020, the Ponds entered and ended the period in the Assessment Monitoring Program. Assessment monitoring events conducted in January, June, and October 2020 did not reveal any CCR Appendix IV constituents at concentrations representing a SSL above the corresponding GWPSs.

Based on the findings, no groundwater monitoring concentrations exceeding the GWPSs established pursuant to §257.95(h) for Appendix IV constituents are associated with the Bottom Ash Ponds.

## 6.0 Future Use of the Bottom Ash Recycle Pond

As of the certification date of this report (see Section 7.0), the Bottom Ash Ponds will be deemed closed CCR units under 40 CFR §257. Accordingly, CCR Rule requirements for active units will no longer apply to these impoundments.

Following closure, it is GenOn's intent to maintain the pond for potential management and temporary storage of non-CCR liquids, as may be needed. Currently, GenOn intends to utilize the ponds to manage leachate from an off-site source, in accordance with state permits.

## 7.0 Qualified Professional Engineer Certification

I, the undersigned professional engineer licensed in the Commonwealth of Pennsylvania, certify in accordance with §257.102(f)(3), that the Bottom Ash Recycle Pond and Emergency Ash Pond at the Cheswick Generating Station were closed in accordance with the requirements of §257.102(c) of the CCR Rule and the Closure Plan. The basis of this professional opinion is described within this report and is limited to the available information known to GAI. This professional opinion is not to be interpreted or construed as a guarantee, warranty, or legal opinion.

Name of Professional Engineer:

John R. Klamut, P.E.

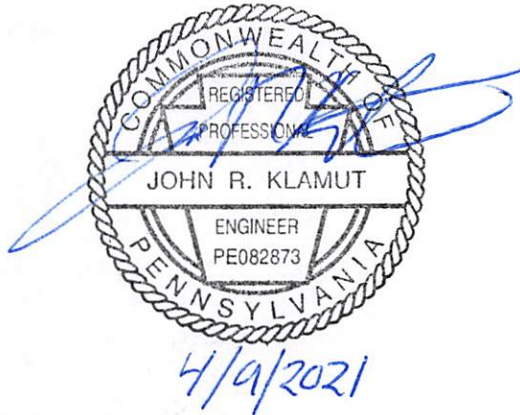
Company:

GAI Consultants, Inc.

PE Registration Number:

PE082873

Professional Engineer Seal:



## **APPENDIX A**

### **Bottom Ash Ponds Closure Activities Photo Log**



**Photograph 1: Emergency Ash Pond, facing Southeast.**  
Date: 3/24/2021

**Description: Southern and Eastern embankments of Emergency Ash Pond after CCR removal. The sideslopes and pond bottom were visually inspected and no CCR was observed.**



**Photograph 2: Emergency Ash Pond, facing South.**  
Date: 3/24/2021

**Description: Southern and Western embankments of Emergency Ash Pond during CCR removal. CCR shown in picture was removed on 3/24/2021.**



**Photograph 3: Bottom Ash Recycle Pond, facing Northwest.  
Date: 12/16/2020  
Description: Bottom Ash Recycle Pond following CCR removal.**