



# Sunbury Generation LP

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March 26, 2009

Mr. Richard Kinch  
US Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Dr.  
5th Floor: N-5783  
Arlington, VA 22202-2733

Dear Mr. Kinch:

***1. Relative to the National Inventory criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.***

Sunbury Generation LP, Ash Basin No. 1  
Captive Class II Residual Waste Impoundment  
Monroe Township, Snyder County  
Operating Permit # 301306  
Issued by: Pennsylvania Department of Environmental Protection  
Northcentral Regional Office  
Williamsport, PA 17701  
Permit renewal date: 10/27/08

This unit has not been assigned a rating.

***2. What year was each management unit commissioned and expanded?***

Residual Waste Ash Basin No. 1 went into service in 1949. The basin was constructed by building a dike on the north, east (river side) and south side of a borrow area that provided soil for the construction of the Sunbury EGS. The top of the dike's elevation originally varied from elevation 442 feet MSL to elevation 444 feet MSL with the west side of the basin being at natural grade. In 1959 the top elevation of the dike was raised to elevation 447.5 feet MSL to provide additional ash disposal capacity. This facility is bounded on the east by the Susquehanna River, on the south by Rolling Green Run, on the west by a Conrail railroad track and on the north by the Plant entrance road. The original bottom of the basin varied from elevation 429.5 feet MSL at the north end to elevation 425.5 feet MSL at the south end making the bottom 18 to 22 feet below the current top of dike elevation. There have been no slope failures or stability problems since the dike was constructed.

As a result Residual Waste regulations enacted in Pennsylvania in 1992, Residual Waste Ash Basin No. 1 was re-permitted by the former owners of the facility, namely Pennsylvania Power and Light, Inc. in accordance with the revised regulations. In this regard, soil core borings were taken from two locations within the existing dike area for laboratory analysis to determine strength parameters. A computer slope stability analysis was performed and indicated a factor of safety 1.83 under static loading conditions and 1.26 for dynamic loading conditions. The facilities operating permit was approved by the Pennsylvania Department of Environmental Protection, Bureau of Waste Management, Northeast Regional Office on October 28, 1998.

Subsequently the facility permit was renewed by Sunbury Generation LP (the facility's current owner) on October 27, 2008 in accordance with the PA DEP 10 year permit renewal cycle.

Of the original 62.0 acres of impoundment area, there are currently, 16.0 acres of pond area remaining, with a current storm water freeboard of 4.5 feet. The currently dry portions of the basin (those areas where ash has been placed and dewatered) have been compacted through repeated passes of heavy equipment, with most of these areas now covered with final cover material (ie. Soil) and re-vegetated with permanent grasses. In this regard, bearing capacity calculations completed in 1998 for the dewatered material indicate a bearing capacity of 2.25 tons per square foot.

**3.0 What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporary or permanently contained in the unit(s).**

Residual Waste Ash Basin #1 is currently permitted under PA Department of Environmental Protection's-Bureau of Waste Management. Residual Waste Ash Basin No. 1 (Facility ID No. 301036) is currently permitted to receive the following waste streams generated on-site: Bottom Ash, dewatered sludge from the waste water treatment facility, river silt from the water intake tunnel cleanings and captive clean construction demolition wastes. Currently the facility does not accept, store, or dispose of construction demolition wastes in this Residual Waste Ash Basin.

**4. Was the management unit (s) designed by a Professional Engineer? Is or was the construction of the waste management unit (s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit (s) under the supervision of a Professional Engineer?**

The facility was originally constructed in 1949 and is approximately 2,400 feet long by 1050 feet wide. As a result of the Residual Waste Regulations of 1992, Residual Waste Ash Basin No. 1 was re-permitted by the former owner of the facility, namely Pennsylvania Power and Light, Inc. in accordance with the revised regulations. In this regard, the facility's revised operating permit was approved by the Pennsylvania Department of Environmental Protection, Bureau of Waste Management, Northcentral Regional Office on October 28, 1998. Since that time, the permit has been modified and revised under the direction of a Pennsylvania Certified Engineer.

**5. When did the company last assess or evaluate the safety (i.e. structural integrity) of the management unit.....?**

It is not known when the last structural integrity inspection has been conducted in Residual Waste Ash Basin No. 1. It is suspected that this was accomplished in 1992 under ownership of PP&L.

**6. When did a State or Federal regulatory Official last inspect or evaluate the safety (structural integrity) of the management unit (s)?**

On January 13, 2009 George Grose, Steve Puzio, and Clark Smith of the PADEP conducted an inspection of the Residual Waste Ash Basin No. 1. No deficiencies were noted as a result of the inspection. It was recommended that Sunbury Generation LP have removed the woody vegetation on the south bank end of the ash basin. No other items were identified.

**7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue (s) with the management unit (s), and if so, please describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.**

The Residual Ash Basin is inspected monthly by PADEP Bureau of Solid Waste. No deficiencies or corrective actions have been required. We have included a copy of the most recent inspection that was conducted on March 23, 2009.

**8. What is the surface area (acres) and total storage capacity of each of the management unit (s)? What is the volume of the materials currently stored in each management unit(s)? Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit (s). The basis for determining maximum height is explained later in this Enclosure.**

The Residual Ash Basin N. 1 comprises 62.0 Acres, 55.4 Acres of usable space within the dike parameter. In accordance with the PADEP Major Permit Modification Filed in October 2007 the following Weight, Composition and volume of wastes are listed below.

Waste Type	Origin	Current Weight or Volume
Bottom Ash	Boiler Bottom Burned Coal	7,850 CU.YD/YR after Beneficial Use
Waste Water Treatment Basin Sediment	Dewatered Sludge From Waste Water Treatment	156 CU. YD./YR.
Water Intake Sediment	River Sand and Silt From Intake Structure	30 CU.YR/YR.

Total Capacity of Facility: 1,838,000 CU.YD.  
Total Waste Capacity 9,440 CU.YD./YR

**9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these spills were reported to state or federal agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).**

No known spills or releases since facility was acquired in June of 2006.

**10. Please identify all current legal owners (s) and operator (s) at the facility.**

The current owner and operator of the management unit are:

Sunbury Generation LP  
Old Trail Road-PO Box 517  
Shamokin Dam, PA 17876

Please contact us with any additional information requests or if your office needs clarification pertaining to this packet please call us at 570-884-1200.

Sincerely,



Jeffrey Specht  
Plant Manager