

CCR RULE COMPLIANCE

ASH FILTER PONDS HAZARD POTENTIAL CLASSIFICATION INITIAL ASSESSMENT REPORT

Prepared for:



GenOn Northeast Management Company
Conemaugh Generating Station
New Florence, Pennsylvania

Prepared by:



CB&I Environmental & Infrastructure, Inc.
Pittsburgh, Pennsylvania 15235

October 2016

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1.0 Introduction

On December 19, 2014, the Administrator of the United States Environmental Protection Agency signed the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities final rule (the Rule). The Rule was published in the Federal Register on April 17, 2015, became effective on October 19, 2015, and is contained within amended portions of Title 40, Part 257 of the Code of Federal Regulations (CFR). The Rule establishes a comprehensive set of requirements for the disposal/management of CCR in landfills and surface impoundments at coal-fired power plants under Subtitle D of the Resource Conservation and Recovery Act. These requirements include compliance with location restrictions, design criteria, operating criteria, groundwater monitoring and corrective action criteria, and closure and post-closure care aspects.

Included with the design criteria under 40 CFR §257.73(a)(2)(i-ii) are requirements to conduct initial and periodic hazard potential classification assessments for all existing non-incised CCR surface impoundments. Pursuant to the Rule, this hazard potential classification is an assessment of “the possible adverse incremental consequences that result from the release of water or stored contents due to failure of the diked CCR surface impoundment or mis-operation of the diked CCR surface impoundment or its appurtenances.” These assessments are to be certified by a professional engineer, must assign a low, significant, or high hazard potential rating to each CCR unit based on criteria provided in §257.53, and must provide the basis for the selected rating. The initial assessment must be completed no later than October 17, 2016, with subsequent periodic assessments required every 5 years.

The Conemaugh Generating Station (Station) is a coal-fired power plant operated by GenOn Northeast Management Company (a subsidiary of NRG Energy, Inc. [NRG]) and located in New Florence, Pennsylvania. The Station has four surface impoundments that are subject to this Rule, specifically identified as Ash Filter Ponds A, B, C, and D. The ponds are part of an ash water recycling system, and serve the multi-purpose function of receiving, storing, settling, and supplying water for bottom ash sluicing activities. Other components of the ash water recycling system include a distribution box (also known as the receiver box), ash dewatering bins (which receive sluice water from the bottom ash hoppers), an ash water recycle sump (AWRS), and recycling and level control pumps.

Water from the ponds drains via gravity to the AWRS, where it is subsequently pumped to the bottom ash hoppers during sluicing. Sluice water from the hoppers is sent to dewatering bins, and is decanted or drained from the bins and sent back to the ponds via the distribution box. Some water is introduced into the system via precipitation falling directly into and around the ponds, and from additional sources (such as sump pumps, drains, and plant processes) that are routed to the distribution box and AWRS locations. These sources help to replenish any losses,

ensuring an adequate, ongoing supply of sluice water. Still, the majority of the water that flows through the system is recycled. In addition, there are overflow provisions for the ponds and the AWRS. Accumulated bottom ash is removed from the ponds during periodic cleanout activities and is transported to the Station's CCR landfill (the Ash/Refuse Disposal Site). The locations of the Station and the ponds are shown on Figure 1.

NRG engaged the services of CB&I Environmental & Infrastructure, Inc. (CB&I) to conduct a review of the Ash Filter Ponds with respect to their size, configuration, and downstream features to develop respective hazard potential classifications for each of these CCR impoundments. This effort included the review of available background and design information and a field visit conducted on June 28, 2016.

This Report has been prepared to identify the initial hazard potential classification for the subject CCR impoundments, and to provide documentation required by the Rule, including the basis for the classification and certification of the findings by a professional engineer. Beyond this introductory section, Section 2.0 outlines the regulatory criteria for selection of a hazard potential classification; Section 3.0 describes the activities performed to support the hazard potential classification; and Section 4.0 provides the formal hazard rating assigned to each of the impoundments. Section 5.0 contains the professional engineer certification, and Section 6.0 lists the references that were consulted during this assessment.

As required, this Initial Assessment Report will be appropriately placed in the facility's operating record pursuant to §257.105(f)(5), noticed to the State Director per §257.106(f)(4), and posted to the publicly accessible internet site pursuant to §257.107(f)(4).

2.0 Hazard Potential Classification Criteria

The Rule presents hazard classification criteria as a means to categorize “the possible adverse incremental consequences that result from the release of water or stored contents due to failure or mis-operation of the diked CCR surface impoundment or its appurtenances.” (Federal Register, 2015). From §257.53, there are three potential Hazard Classifications for CCR impoundments: Low, Significant, and High. The criteria for each category are as follows:

- *Low Hazard Potential* – Failure or mis-operation of the diked surface impoundment results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner’s property.
- *Significant Hazard Potential* – A failure or mis-operation of the diked surface impoundment results in no probable loss of human life, but can cause disruption of lifeline facilities, or impact other concerns.
- *High Hazard Potential* - Failure or mis-operation of the diked surface impoundment will probably cause loss of human life.

3.0 Hazard Potential Classification Activities

The hazard potential classification process included three main steps: review of background and design information for the impoundments; conduct of a field visit to view the impoundments and surrounding area; and selection of a hazard potential rating for each impoundment using regulatory criteria presented in the Rule.

3.1 Review of Background and Design Information

Prior to the field visit, CB&I collected and reviewed available background and design information regarding the impoundments and surrounding area, including mapping, aerial images, and reports and other documents provided by NRG. Mapping and aerial images were utilized to prepare Figures 1 through 3 included with this report. Pertinent information identified during development of the figures included ground surface elevations and topography, property boundary lines, structures, surface water features, and infrastructure in the vicinity of the impoundments.

The impoundments are situated toward the southern reaches of the Station property, just southwest of the primary operations area. The nearest Station property boundary is to the south, and abuts the Conemaugh River. The ponds are located together in a common impoundment area and share an overall perimeter dike. This diked area is bordered by a station haul road to the north and south, a haul road and limestone storage area to the west, and the flue gas desulfurization (FGD) system to the east. A rail corridor runs through the Station property between the impoundment area and the Conemaugh River. At its closest, the rail corridor is over 300 feet away from the toe of the basin impoundment area.

Topographic information for the subject area was obtained from a site survey by L. R. Kimball performed in 2010 (Kimball, 2010). The overall topography in the vicinity of the ponds slopes southward toward the Conemaugh River. The common diked area has a crest elevation of approximately 1092 to 1095 feet mean sea level (ft msl). The greatest exterior embankment heights occur on the western and southern sides, while relief on the northern and eastern sides is minimal. The western and southern embankments slope to the west and south, respectively, to perimeter channels at the toe, at an approximate elevation of 1080 ft msl. These perimeter channels convey water southward and westward, respectively, to a roadside culvert. Drainage entering the culvert passes below the site access road and is then routed southward through undeveloped Station property and eventually beneath the rail corridor in the direction of the Conemaugh River (located approximately 0.2 to 0.3 miles from the impoundments). Under normal conditions, the majority of runoff following this flow path would be expected to infiltrate before ever reaching the River. Toward the north and east, the ground surface generally slopes

away from the ponds, toward a grassy area and perimeter road to the north, and toward the FGD system to the east.

Google Earth imagery (Google Earth, 2015) was consulted to check for notable nearby features and to confirm select elevations. Google Earth indicated a typical crest elevation of approximately 1,092 ft msl around the western, northern, and southern pond perimeters and a slightly higher crest elevation of approximately 1,095 ft msl on the eastern side, which is in agreement with the elevations identified in the design plans (Gilbert Associates, 1995) and topographic mapping (Kimball, 2010). Infrastructure in the vicinity of the ponds is limited to the onsite access road, an elevated limestone conveyor, and the rail corridor. The closest nearby properties and structures are 0.3 to 0.5 miles southwest of the ponds and are separated from the Station property by the Conemaugh River.

Several wetlands are present in the low-lying area between the ponds and Conemaugh River, with the majority of these occurring south of the rail corridor. A delineation of wetlands and also a Pennsylvania Natural Diversity Inventory were completed in the anticipated inundation area as part of a study conducted in advance of the rail line construction in 2005. The study indicated that in general, the wetlands in the vicinity of the rail line and downstream of the ponds are palustrine emergent (with precipitation and runoff as the only water sources) and palustrine scrub-shrub wetlands. No critical or endangered species were found to be present in the vicinity of the rail project (GAI, 2005).

As part of this hazard assessment, design and operational background information for the ponds was reviewed. It is important to note that the classification required by §257.73 is based on the consequences of the impoundment failing, and not on the likelihood of a failure. Subsequently, a limited amount of design and operational information was pertinent to this evaluation. Specifically, the contents and capacities of the ponds were considered as information relevant to estimating an inundation area and further determining the associated impacts that would occur under a breach scenario.

Each pond has a storage capacity of 6.2 acre-feet (ac-ft), based on a combined operational capacity for three ponds of 18.6 ac-ft (Dewberry Consultants, 2014). Only three of the four ponds are in use at any one time, with the fourth out of service for maintenance and cleaning purposes. For the purpose of this hazard assessment, each pond is considered as a separate unit, as the failure or breach of one unit would not directly translate into the failure or breach of additional units. The capacity of each pond was considered relative to the downstream areas to help identify the approximate potential inundation area. In addition, the single pond capacity was compared to a threshold value of 20 ac-ft, at which impoundments of five feet in height or more require the compilation and submittal of additional construction and stability-related

information. Due to the capacity of each pond being less than 20 ac-ft, no evaluations beyond hazard potential classifications are required by §257.73.

3.2 *Field Visit*

On June 28, 2016, Laurel Lopez (CB&I senior engineer) met with James Brunson (NRG Environmental Specialist) to perform a site walk and visual reconnaissance of the ponds and surrounding area. CB&I walked the perimeter of the ponds and confirmed that the ash water recycling features appeared to be in overall agreement with the previously reviewed reports and documents. CB&I visually assessed upstream conditions for run-on potential and likely breach flow path downstream conditions, respectively. Due to the diked construction of the impoundment area, potential run-on is minimal, limited to precipitation falling directly on and in the immediate vicinity of the ponds. With respect to the most likely flow path during breach conditions, breaches to the west (for ponds A, B, C, or D) or south (pond D) were considered, as the lack of significant embankments to the north and east would preclude failure in those directions. Access roads to the west and south of the ponds, as well as an elevated limestone conveyor system to the south of the ponds, were noted to be present and potentially impacted during a breach scenario.

Stormwater channels were observed along the western and southern embankment toes, converging at the southeast corner of the embankment area at a culvert passing under the site access road. Downstream of the culvert, a series of swales, channels, and other conveyance features direct flow southward, under the rail corridor and through undeveloped wooded and brush-covered Station property, whereupon infiltration of the majority of the runoff would be expected. This area is topographically lower than a perimeter access way that runs along the Conemaugh River, preventing direct discharge from the area to the river. Other than the site access road, conveyor, and rail corridor, no notable manmade features (structures, utilities, etc.) were observed in the downstream area near the ponds.

3.3 *Hazard Potential Classification Determination*

The information gathered from review of background and design documents/drawings and during the site visit was utilized to complete a Hazard Potential Classification Form (Form) for each impoundment, contained in Attachment A of this report. The Form was devised by CB&I to provide a comprehensive, methodical, and quantitative means to select a hazard rating. The following types of impacts were considered: loss of human life, economic losses, environmental losses, damage to lifeline facilities, and other concerns (such as impacts to critical facilities, typically represented by medical facilities, transportation facilities, etc.). A worst-case failure scenario was considered to be a catastrophic dike failure and sudden release of the impoundment contents (i.e., a breach scenario). As noted previously, the failure of one pond would not tend to

cause the failure of the others; as such, each pond was considered independently. Due to similarities between the ponds, the findings and conclusions are consistent between the ponds.

During a pond breach scenario, it would be expected that solid material from the structure's berm and also settled solids contained in the pond would generally deposit in the near vicinity of the pond toe. Some of the finer sediment from the pond may be transported further, but it is anticipated that the majority of solid material would drop out near the access road and in the large flat area north of the rail corridor. Any flow continuing to the rail corridor would be further filtered and attenuated by the elevated and ballasted rail bed. It is anticipated that flow passing the rail lines and continuing toward the River would be predominantly water, and that the flow would further dissipate across the relatively flat, undeveloped area within the boundary of the Station property. Relatively higher topography along the Conemaugh River prevents direct discharge from this area to the river. There are no foreseeable impacts to neighboring properties. Aside from possible temporary impacts to an internal Station roadway and less likely to the conveyor system, no adverse impacts to infrastructure are anticipated. Additionally, no adverse impacts to structures, utilities, lifeline or critical facilities, or natural areas are anticipated.

4.0 Conclusions

Based on the review of background and design information, observations made during the site visit, and hazard potential evaluation activities performed as part of this assessment, the following hazard ratings were selected for the Conemaugh Station CCR impoundments:

Impoundment Name	Hazard Potential Rating
Ash Filter Pond A	Low
Ash Filter Pond B	Low
Ash Filter Pond C	Low
Ash Filter Pond D	Low

These ratings are based on the determination that a failure or mis-operation of these impoundments would be unlikely to cause a loss of human life and would cause minor economic or environmental losses principally limited to the surface impoundment owner's property. In addition, a failure or mis-operation would be unlikely to impact lifeline or critical facilities or cause other significant negative effects.

5.0 Professional Engineer Certification

I attest to being familiar with the hazard potential standards of the Rule, and the classification categories as defined in 40 CFR §257.53. I have personally visited and examined the Conemaugh Generating Station Ash Filter Ponds, and hereby certify that the information contained in this report and the selected hazard potential classifications for the subject units are true and accurate to the best of my belief. This initial hazard potential classification has been conducted in accordance with the requirements of 40 CFR §257.73.

Name of Professional Engineer: Laurel C. Lopez

Company: CB&I Environmental & Infrastructure, Inc.

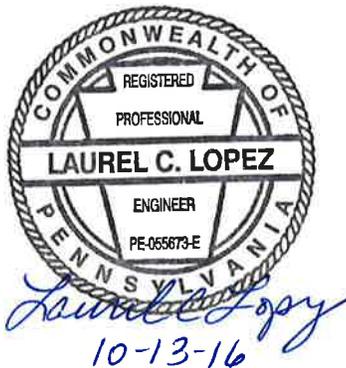
Signature: *Laurel C Lopez*

Date: 10-13-16

PE Registration State: Pennsylvania

PE Registration Number: PE-055673-E

Professional Engineer Seal:



6.0 References

“Critical Facilities.” *The National Weather Service*. Web. 6 May 2016.

Dewberry Consultants, LLC. “Coal Combustion Residue Impoundment Round 12 – Dam Assessment Report, Conemaugh Generating Station Filter Ash Ponds & CT Desilting Basin, GenOn Energy New Florence, PA.” Prepared for the United States Environmental Protection Agency. January 2014.

Federal Emergency Management Agency (FEMA). “National Flood Hazard Layer.” Indiana County, Pennsylvania. January 27, 2015.

Federal Register, Vol. 80, No. 74. Sections 257.53 (Definitions) and 257.73 (Structural Integrity Criteria for Existing CCR Surface Impoundments). April 17, 2015.

GAI Consultants, Inc. “Wetland Delineation Report, Conemaugh Power Station, Loop Track Project Area.” November 2005.

Geosyntec. “Geotechnical and Hydraulic Assessment Report, Conemaugh Generating Station – Filter Ash Ponds and Desilting Basin.” November 22, 2013.

Gilbert Associates, Inc. “Conemaugh Power Station Addition of 4th Ash Filter Pond, As-Built Drawing No. D-782-008.” Revised October 10, 1995.

Google Earth. Imagery for Conemaugh Generating Station, New Florence, Pennsylvania. Dated October 11, 2015.

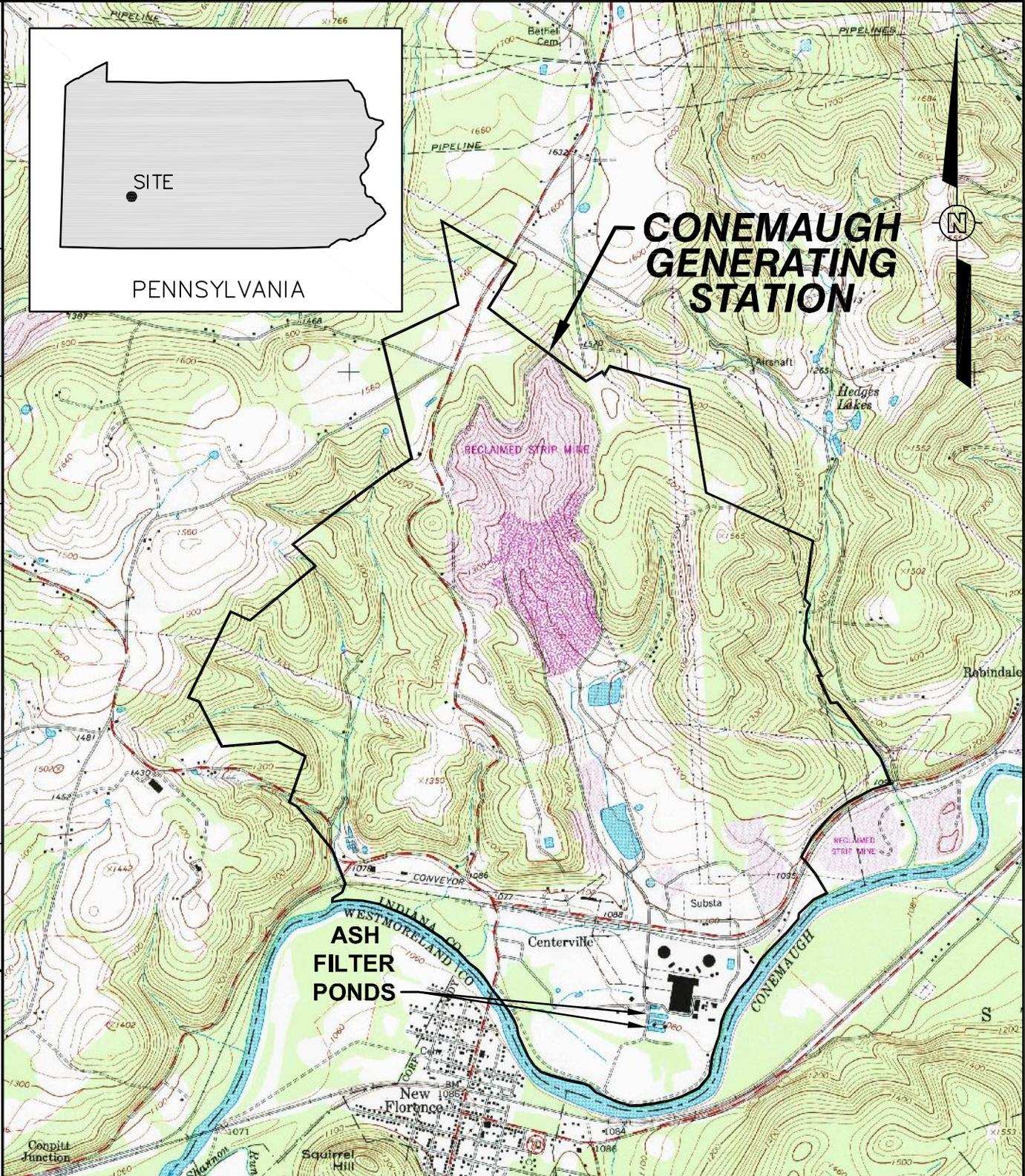
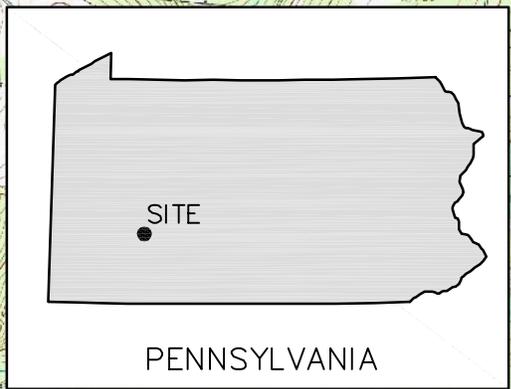
Kimball, L. R., “Conemaugh Station Base Mapping.” Drawing No. E-744-3093-0. August 4, 2010.

Raytheon Engineers & Constructors, Inc., “System Description, Ash Water Recycle, Conemaugh Station.” May 5, 1995.

Reliant Energy. “Water Balance Diagram, for Conemaugh Station Units 1 & 2.” Drawing No. 1942-SK-M-113 SH 2 Rev. 9. February 3, 2006.

Figures

OFFICE	DATE	DESIGNED BY	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
Pittsburgh, PA	9/13/16	LCL	ELS	D/S	LCL	1009144003-A1



CB&I
500 Penn Center Boulevard, Suite 1000
Pittsburgh, Pennsylvania



FIGURE 1
SITE LOCATION MAP
CONEMAUGH GENERATING STATION
INDIANA COUNTY, PENNSYLVANIA

REFERENCE:
U.S.G.S. TOPOGRAPHIC MAP, 7.5 MINUTE SERIES, NEW FLORENCE, PENNSYLVANIA QUADRANGLE, DATED 1964.

File: O:\PROJECT\1009144003_Conemaugh\1009144003-A1.dwg
Plot Date/Time: Sep 13, 2016 - 12:05pm
Plotted By: evan.schlegel

OFFICE	DATE	DESIGNED BY	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
Pittsburgh, PA	10/6/16	LCL	ELS	DJS	LCL	1009144003-B1

File: O:\PROJECT\1009144003_Conemaugh\1009144003-B1.dwg
 Plot Date/Time: Oct 13, 2016 - 1:20pm
 Plotted By: Evan.Schlegel



LEGEND:

- APPROXIMATE STATION PROPERTY BOUNDARY
- EXISTING DRAINAGE CHANNEL OR SWALE

REFERENCE:

GOOGLE EARTH AERIAL PHOTOGRAPH DATED 10/11/2015.



CB&I
 500 Penn Center Boulevard, Suite 1000
 Pittsburgh, Pennsylvania 15235

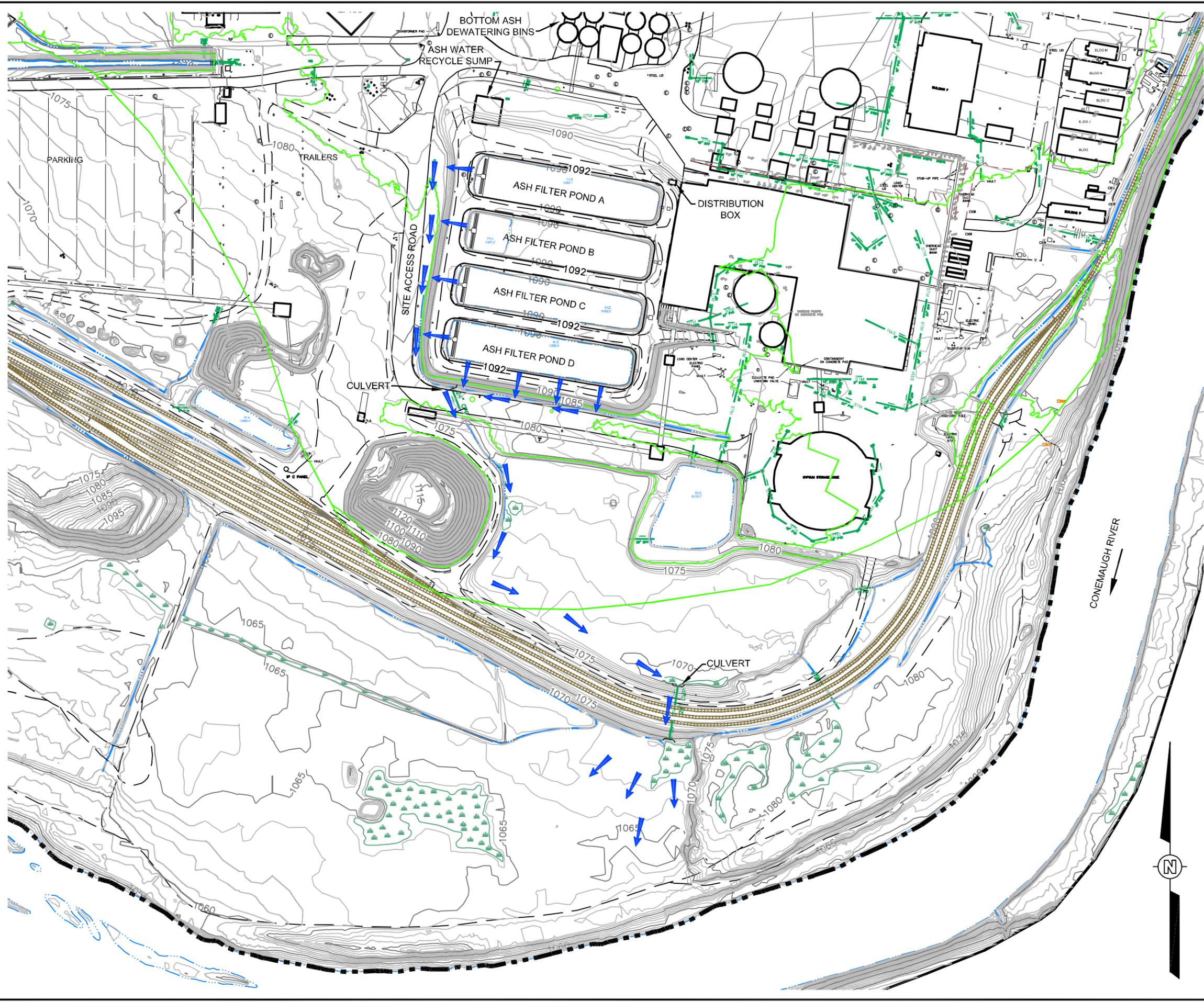


**FIGURE 2
 PHOTOGRAPHIC MAP**

CONEMAUGH GENERATING STATION
 INDIANA COUNTY, PENNSYLVANIA

OFFICE Pittsburgh, PA
 DATE 10/6/16
 DESIGNED BY LCL
 DRAWN BY ELS
 CHECKED BY DJS
 APPROVED BY LCL
 DRAWING NUMBER 1009144003-B2

File: O:\PROJECT\1009144003_Conemaugh\1009144003-B2.dwg
 Plot Date/Time: Oct 13, 2016 - 1:24pm
 Plotted By: Evan.Schlegel



- LEGEND:**
- APPROXIMATE STATION PROPERTY BOUNDARY
 - 1070 1-FOOT TOPOGRAPHIC CONTOUR (REFERENCE 1)
 - EXISTING DRAINAGE CHANNEL OR SWALE
 - ← FLOW DIRECTION OF POND CONTENTS UNDER BREACH SCENARIO
 - EXISTING STRUCTURE (REFERENCE 1)
 - FEMA SPECIAL FLOOD HAZARD AREA (SFHA) LIMITS (REFERENCE 2)
 - STM STORMWATER CULVERT
 - 1092 APPROXIMATE POND CREST ELEVATION (REFERENCE 3)

- REFERENCES:**
1. GROUND SURFACE CONTOURS, EXISTING STRUCTURES, AND SITE FEATURES WERE OBTAINED FROM SITE SURVEY DRAWING NO. E-744-3093-0, "CONEMAUGH STATION BASE MAPPING", BY L.R. KIMBALL, DATED 8/4/2010.
 2. SFHA LIMITS WERE OBTAINED FROM FEMA, NATIONAL FLOOD HAZARD LAYER, INDIANA COUNTY, PA, 01/27/2015.
 3. APPROXIMATE CREST ELEVATIONS WERE OBTAINED FROM "CONEMAUGH POWER STATION ADDITION OF 4TH ASH FILTER POND, AS-BUILT DRAWING NO. D-782-008", BY GILBERT ASSOCIATES, INC., LAST REVISED 10/10/1995.




 CB&I
 500 Penn Center Boulevard, Suite 1000
 Pittsburgh, Pennsylvania 15235



FIGURE 3
TOPOGRAPHIC AND FLOW
DIRECTION MAP
 CONEMAUGH GENERATING STATION
 INDIANA COUNTY, PENNSYLVANIA

Attachment A

Hazard Potential Classification Forms



**CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM**

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond A

Type of Inspection (Circle One): Initial

Periodic

Date of Visit: 6/28/2016

IV. Lifeline Facilities

40 CFR 257.53 associates disruption of lifeline facilities with a Significant hazard potential rating. The National Weather Service defines lifeline facilities as distributive systems and related facilities necessary to provide electric power, oil and natural gas, water and wastewater, and communications.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Lifeline Facilities Would a failure or mis-operation likely cause disruption to any distributive systems or facilities that provide electric power, oil and natural gas, water and wastewater, or communication services?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No = 1 Yes = 2	1	Critical Station infrastructure is located outside of the anticipated inundation area.

V. Other Concerns

40 CFR 257.53 notes the potential for other concerns not specifically identified in the regulation to justify a Significant hazard rating. CB&I recognizes probable impacts to "Critical Facilities" as another concern that may trigger a Significant hazard rating. Critical Facilities as identified by the National Weather Service are listed below. Lifeline Facilities are also considered to be Critical Facilities, but are not listed below due to being addressed in Item IV. The inspector shall also consider any other site-specific concerns not previously addressed that may impact the hazard rating, and shall write in any such concerns below.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Critical Facilities Would failure or mis-operation of the impoundment likely cause damage or sustained closure of any of the following critical facilities? If yes, please specify. Emergency Response Facilities Medical Facilities Designated Emergency Shelters Transportation Telecommunications Data centers Financial Major industrial/commercial	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No (to all) = 1 Yes (to any) = 2	1	
Other Concerns Are there any other significant concerns relative to the potential impacts due to the failure or mis-operation of this impoundment? If yes, please specify.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No = 1 Yes = 2 (Depending on Severity)	1	

IV. Conclusions/Final Rating

The Final Rating is equal to the Maximum of all "Selected Scores" above.

Final Score = (=Maximum "Selected Score" from above)
Hazard Potential Classification = (1 = Low 2 = Significant 3 = High)

Laurel C. Lopez

Printed Name

Laurel C. Lopez

Signature*

Senior Engineer, CB&I

Title / Company

* Signature certifies that the inspection was performed as indicated, and that the information contained herein is true and accurate to the best of the inspector's knowledge.



**CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM**

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond B

Type of Inspection (Circle One): Initial Periodic

Date of Visit: 6/28/2016

IV. Lifeline Facilities

40 CFR 257.53 associates disruption of lifeline facilities with a Significant hazard potential rating. The National Weather Service defines lifeline facilities as distributive systems and related facilities necessary to provide electric power, oil and natural gas, water and wastewater, and communications.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Lifeline Facilities Would a failure or mis-operation likely cause disruption to any distributive systems or facilities that provide electric power, oil and natural gas, water and wastewater, or communication services?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No = 1 Yes = 2	1	Critical Station infrastructure is located outside of the anticipated inundation area.

V. Other Concerns

40 CFR 257.53 notes the potential for other concerns not specifically identified in the regulation to justify a Significant hazard rating. CB&I recognizes probable impacts to "Critical Facilities" as another concern that may trigger a Significant hazard rating. Critical Facilities as identified by the National Weather Service are listed below. Lifeline Facilities are also considered to be Critical Facilities, but are not listed below due to being addressed in Item IV. The inspector shall also consider any other site-specific concerns not previously addressed that may impact the hazard rating, and shall write in any such concerns below.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Critical Facilities Would failure or mis-operation of the impoundment likely cause damage or sustained closure of any of the following critical facilities? If yes, please specify. Emergency Response Facilities Medical Facilities Designated Emergency Shelters Transportation Telecommunications Data centers Financial Major industrial/commercial	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No (to all) = 1 Yes (to any) = 2	1	
Other Concerns Are there any other significant concerns relative to the potential impacts due to the failure or mis-operation of this impoundment? If yes, please specify.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No = 1 Yes = 2 (Depending on Severity)	1	

IV. Conclusions/Final Rating

The Final Rating is equal to the Maximum of all "Selected Scores" above.

Final Score = (=Maximum "Selected Score" from above)
Hazard Potential Classification = (1 = Low 2 = Significant 3 = High)

Laurel C. Lopez

Printed Name

Laurel C. Lopez

Signature*

Senior Engineer, CB&I

Title / Company

* Signature certifies that the inspection was performed as indicated, and that the information contained herein is true and accurate to the best of the inspector's knowledge.



**CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM**

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond C

Type of Inspection (Circle One): Initial Periodic

Date of Visit: 6/28/2016

IV. Lifeline Facilities

40 CFR 257.53 associates disruption of lifeline facilities with a Significant hazard potential rating. The National Weather Service defines lifeline facilities as distributive systems and related facilities necessary to provide electric power, oil and natural gas, water and wastewater, and communications.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Lifeline Facilities Would a failure or mis-operation likely cause disruption to any distributive systems or facilities that provide electric power, oil and natural gas, water and wastewater, or communication services?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No = 1 Yes = 2	1	Critical Station infrastructure is located outside of the anticipated inundation area.

V. Other Concerns

40 CFR 257.53 notes the potential for other concerns not specifically identified in the regulation to justify a Significant hazard rating. CB&I recognizes probable impacts to "Critical Facilities" as another concern that may trigger a Significant hazard rating. Critical Facilities as identified by the National Weather Service are listed below. Lifeline Facilities are also considered to be Critical Facilities, but are not listed below due to being addressed in Item IV. The inspector shall also consider any other site-specific concerns not previously addressed that may impact the hazard rating, and shall write in any such concerns below.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Critical Facilities Would failure or mis-operation of the impoundment likely cause damage or sustained closure of any of the following critical facilities? If yes, please specify. Emergency Response Facilities Medical Facilities Designated Emergency Shelters Transportation Telecommunications Data centers Financial Major industrial/commercial	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No (to all) = 1 Yes (to any) = 2	1	
Other Concerns Are there any other significant concerns relative to the potential impacts due to the failure or mis-operation of this impoundment? If yes, please specify.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No = 1 Yes = 2 (Depending on Severity)	1	

IV. Conclusions/Final Rating

The Final Rating is equal to the Maximum of all "Selected Scores" above.

Final Score = (=Maximum "Selected Score" from above)
Hazard Potential Classification = (1 = Low 2 = Significant 3 = High)

Laurel C. Lopez

Printed Name

Laurel C. Lopez

Signature*

Senior Engineer, CB&I

Title / Company

* Signature certifies that the inspection was performed as indicated, and that the information contained herein is true and accurate to the best of the inspector's knowledge.



**CCR SURFACE IMPOUNDMENT
HAZARD POTENTIAL CLASSIFICATION FORM**

Facility Name: Conemaugh Generating Station

Unit Name: Ash Filter Pond D

Type of Inspection (Circle One): Initial

Periodic

Date of Visit: 6/28/2016

IV. Lifeline Facilities

40 CFR 257.53 associates disruption of lifeline facilities with a Significant hazard potential rating. The National Weather Service defines lifeline facilities as distributive systems and related facilities necessary to provide electric power, oil and natural gas, water and wastewater, and communications.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Lifeline Facilities Would a failure or mis-operation likely cause disruption to any distributive systems or facilities that provide electric power, oil and natural gas, water and wastewater, or communication services?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No = 1 Yes = 2	1	Critical Station infrastructure is located outside of the anticipated inundation area.

V. Other Concerns

40 CFR 257.53 notes the potential for other concerns not specifically identified in the regulation to justify a Significant hazard rating. CB&I recognizes probable impacts to "Critical Facilities" as another concern that may trigger a Significant hazard rating. Critical Facilities as identified by the National Weather Service are listed below. Lifeline Facilities are also considered to be Critical Facilities, but are not listed below due to being addressed in Item IV. The inspector shall also consider any other site-specific concerns not previously addressed that may impact the hazard rating, and shall write in any such concerns below.

Condition	Yes	No	N/A	Scoring	Selected Score	Comments
Critical Facilities Would failure or mis-operation of the impoundment likely cause damage or sustained closure of any of the following critical facilities? If yes, please specify. Emergency Response Facilities Medical Facilities Designated Emergency Shelters Transportation Telecommunications Data centers Financial Major industrial/commercial	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No (to all) = 1 Yes (to any) = 2	1	
Other Concerns Are there any other significant concerns relative to the potential impacts due to the failure or mis-operation of this impoundment? If yes, please specify.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No = 1 Yes = 2 (Depending on Severity)	1	

IV. Conclusions/Final Rating

The Final Rating is equal to the Maximum of all "Selected Scores" above.

Final Score = (=Maximum "Selected Score" from above)
Hazard Potential Classification = (1 = Low 2 = Significant 3 = High)

Laurel C. Lopez

Printed Name

Laurel C. Lopez

Signature*

Senior Engineer, CB&I

Title / Company

* Signature certifies that the inspection was performed as indicated, and that the information contained herein is true and accurate to the best of the inspector's knowledge.