



Coal Combustion Residuals Impoundment Closure Plan

Conemaugh Generating Station
Bottom Ash Filter Ponds A, B, C, and D
New Florence, Pennsylvania

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

Prepared for: Conemaugh Generating Station
1442 Power Plant Road
New Florence, Pennsylvania 15944-9154

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Professional Engineer's Certification

The Closure Plan (Plan) for Bottom Ash Filter Ponds A, B, C, and D was prepared by GAI Consultants, Inc. (GAI). The Plan was based on certain information that, other than for information GAI originally prepared, GAI has relied on but not independently verified. Therefore, this Professional Engineer's Certification is limited to the information available to GAI at the time the Plan was written. On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the Commonwealth of Pennsylvania, that the Plan has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances and at the time and in the same locale. It is my professional opinion that the Plan was prepared consistent with §257.102(b) of the United States Environmental Protection Agency's "Disposal of Coal Combustion Residuals from Electric Utilities," published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015.

The use of the words "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion and is not and shall not be interpreted or construed as a guarantee, warranty or legal opinion.

Adam B. Scheller, PE
Printed Name of Professional Engineer

PE082946
Commonwealth of Pennsylvania License Number


Signature of Professional Engineer

4/19/2024
Date



Plan Revisions

Revision	Date	Reason	Description	Reviewer
0	August 2016		Original Document	NRG, GAI Consultants
1	January 2021	Administrative Changes	Remove GenOn/NRG, update projected closure date, other miscellaneous administrative changes	Conemaugh Station, GAI Consultants
2	April 2024	Updates related to current Station operations	Include language to support initiation of closure for individual ponds; Update year of Station retirement; Additional description of ash filter pond operations in recent years.	Conemaugh Station, GAI Consultants

1.0 Introduction

The Conemaugh Generating Station is a steam electric generating station located along the Conemaugh River in West Wheatfield Township, Indiana County, Pennsylvania (PA). The station consists of two, 850-megawatt (nominal net maximum load) coal-fired units. The station commenced operation in 1970.

Four ash filter ponds are located at the Conemaugh Generating Station site. The ash filter ponds consist of Bottom Ash Filter Ponds A, B, C, and D. All were constructed as authorized under PA Department of Environmental Protection Water Quality Management Permit No. 3283201. During station operations, the bottom ash is sluiced from the ash hoppers to the hydrobins where the ash particles are allowed to settle. The hydrobin overflow water with suspended particles gravity-flows to a valved-control system which distributes the flow to the ash filter ponds. The underflow is periodically drained in preparation for ash removal from the hydrobins. This underflow also gravity-flows to the in-service ash filter ponds. The dewatered coal combustion residuals (CCRs) are loaded onto trucks for disposal at the Conemaugh Ash/Refuse Disposal Site. The maximum quantity of coal combustion material ever on-site over the active life of each pond is 10,000 cubic yards.

During normal operations for most of the Station's history, two ponds were in service to handle the hydrobin overflow; one pond was in service to act as the recycle pond, and the remaining pond was drained, cleaned, and prepared for service. In recent years, as a result of decreased power generation requirements, it is possible for the Station to operate with only three ash filter ponds, with one or two ponds in service to accept hydrobin overflow and one pond in service as a recycle pond.

2.0 Closure Plan

This CCR Closure Plan (CP) [§257.102(b)] sets forth the steps required to complete closure activities of the ash filter ponds by removing the CCR and decontaminating all areas affected by releases from the CCR unit in accordance with §257.102(b)(1)(ii) and §257.102(c). This CP will be maintained in the facility's operating record in accordance with §257.102(b)(2)(iii) by October 17, 2016. Closure could occur for one or more ponds concurrently.

2.1 Closure Plan Overview

The CP includes the following:

- Narrative describing how the CCR unit will be closed in accordance with §257.102;
- Description of the closure of the ash filter ponds including a general description of the methods and procedures to remove all CCR and decontaminate all affected areas, and a description stating how closure will achieve the performance standards set forth by §257.102(c);
- Estimate of the maximum inventory of CCR ever on-site over the active life of the pond;
- Estimate of the largest area of the CCR unit ever requiring closure any time over the disposal site's active life (for in-place closure);
- Schedule for completing all activities necessary to satisfy the closure criteria, including an estimate of the year in which all closure activities for the pond will be completed; and
- Written certification from a qualified professional engineer that the written CP meets the requirements of §257.102.

2.2 Closure Plan Narrative

The impoundments are to be closed by removal of CCR. Prior to initiation of closure activities, a notification of intent to close the CCR unit will be prepared and placed in the facility's operating record as required by §257.102(g) of the CCR Rule. Upon closure of any of the ash filter ponds, liquid, CCR, and applicable liner materials will be removed. Once CCR material has been removed, each pond may be stabilized individually until which time the Station intends to close the entire facility (four ponds and appurtenances). Upon final closure, all associated riser structures, influent pipes, and effluent pipes into the subject pond(s) will be decommissioned, removed, and/or filled with grout. The area will be graded to drain and will be vegetated. Stormwater will be directed through existing outfalls in accordance with National Pollutant Discharge Elimination System (NPDES) Permit No. PA0005011. An outside contractor will be used to perform the decontamination of areas affected by the ash filter pond(s).

The ash filter ponds will be drained by gravity and by using submersible pumps and pump water filter bags, as necessary. The pumped water will be discharged in accordance with NPDES Permit No. PA0005011. Any sediment will be removed and disposed of at the Conemaugh Station Ash/Refuse Disposal Site along with the excavated portions of the liner materials until the ponds are visually free of CCRs. These materials may also be disposed of at a different approved municipal or residual waste disposal facility. Pumps, influent pipes, and discharge pipes in the manholes will be removed along with sampling and electronic monitoring equipment used for flow measurements if they are no longer needed for station operations.

If not transitioned to non-CCR use, the ash filter pond(s) will then be graded to existing surrounding ground surface elevations and finish-graded to a uniform slope for positive drainage. All disturbed areas as a result of closure will be seeded, fertilized, and mulched. Revegetation will be in accordance with Formula W seed mix as defined in the PA Department of Transportation (PennDOT) Specification Publication 408.

2.3 Closure Activities

This section provides a detailed description of the closure activities.

2.3.1 Site Preparation

Site preparation will comply with applicable regulations. The ash filter ponds will be dewatered and sediment will be removed. The liner materials will be excavated until the area is visually free of CCR. Once CCR material has been removed, each pond may be stabilized individually until which time the Station intends to close the entire facility (four ponds and appurtenances). If not transitioned to non-CCR use, the ash filter ponds will be graded with soil and fine-graded to provide positive drainage toward the drainage facilities. Finally, the disturbed areas during closure activities will be seeded, fertilized, and mulched.

2.3.2 Final Seeding

The seeding mixture will be in accordance with Formula W Wetland Conservation Mix from the PennDOT Publication 408. The seed mix is suited for the PA climate.

2.3.3 Stormwater Run-on/Run-off Controls Installation

Erosion and Sedimentation (E&S) Controls will be installed prior to the construction of the pond closures. Specifically, surface water management and erosion control will be provided by gently sloping vegetated areas toward existing outfalls. Temporary E&S controls will also be used during closure. Periodic inspections of the site will be completed at intervals sufficient to detect and correct any impairment of any E&S control device. Refer to Section 3.3 for more information regarding inspection and maintenance of closure.

2.3.4 Groundwater Monitoring

Groundwater monitoring will be conducted in accordance with §257.90 through §257.98. As per §257.102(c), closure by the removal of CCR will be 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 (GPS) established pursuant to §257.95(h) for each constituent listed in Appendix IV of the CCR Rule detected in the groundwater. The CCR groundwater monitoring program will be terminated upon closure if the results do not exceed the GPS and corrective measures have not been initiated in accordance with §257.96.

If constituent concentrations exceed the GPS and corrective measures have been initiated in accordance with §257.97-98, compliance with the GPS developed under §257.95(h) will have been achieved by demonstrating that concentrations of constituents listed in Appendix IV have not exceeded the GPS for three consecutive years (including any data collected prior to closure) in accordance with §257.98 (c)(2).

2.4 Closure Schedule

The total area to be closed is approximately 3.32 acres (each ash filter pond is approximately 0.83-acre). Because the ash filter ponds will be operating as long as at least one of the two electric generating units at Conemaugh Generating Station is fired with coal, closure of the ponds will occur when the station ceases coal-firing operations and CCR and non-CCR wastewater is no longer produced.

Final closure of the ponds must commence 30 days after the ash filter ponds receive the known final receipt of CCR and non-CCR wastewater. The Conemaugh Generating Station has submitted a notice pursuant to §423.19(f) that it will achieve permanent cessation of coal combustion by December 31, 2028. Closure activities must be completed within five years of commencing closure activities [§257.102(e) and (f)]. Closure is anticipated to take approximately five years, due to the time required to:

- Apply for and receive the appropriate permits needed to commence closure activities (including preparing construction bid specifications and contract work);
 - ▶ Notification of intent to close the CCR unit must be prepared no later than the date owner initiates closure of the CCR unit [§257.102(g)];
- Prepare the site to comply with applicable regulations;
- Dewater and remove CCR and sediment from ash filter ponds;
- Backfill pond areas with soil and fine-grade to provide positive drainage; and
- Seed, fertilize, and mulch disturbed areas for final cover protection.

A two-year time extension could be required if complications are encountered as provided for under §257.102(f)(2). Current plans are to complete closure of the entire facility (four ponds and appurtenances) at the same time, but the Station may also choose to complete closure of individual ponds at an earlier date to meet schedule or operational requirements.

Once the ash filter ponds are closed, a professional engineer will verify and certify that closure has been completed in accordance with the CP [§257.102(f)(3)]. Within 30 days of completing closure of the ash filter ponds, a notification of closure will be prepared and will include the professional engineer's certification of completion [§257.102(h)].

3.0 Post-Closure Plan

3.1 Post-Closure Plan Requirements

According to §257.104 Post-Closure Care Requirements, the following requirements are applicable for CCR containing impoundments:

(a) *Applicability.*

- (1) Except as provided by paragraph (a)(2) of this section, §257.104 applies to the owners or operators of CCR landfills, CCR surface impoundments, and all lateral expansions of CCR units that are subject to the closure criteria under §257.102.
- (2) An owner or operator of a CCR unit that elects to close a CCR unit by removing CCR as provided by §257.102(c) is not subject to the post-closure care criteria under this section.

The facility will have all CCR materials removed from the impoundments as part of the closure plan activities. Consequently, pursuant to Section (a)(2) above, a post-closure plan is not required for the impoundments.

4.0 References

CB&I Environmental & Infrastructure, Inc. 2015. *CCR Compliance Fugitive Dust Control Plans*. October 2015.

Form 18R Narrative, Closure/Post-Closure Land Use Plan, Conemaugh Station Ash/Refuse Disposal Site. December 10, 2014.

Form T3, Status and Description Notice for Residual Waste Storage or Disposal Impoundment, Waste Filter Bed No. 1. December 28, 1992.

Form T3, Status and Description Notice for Residual Waste Storage or Disposal Impoundment, Waste Filter Bed No. 2. December 28, 1992.

Form T3, Status and Description Notice for Residual Waste Storage or Disposal Impoundment, Waste Filter Bed No. 3. December 28, 1992.

Form T3, Status and Description Notice for Residual Waste Storage or Disposal Impoundment, Waste Filter Bed No. 4. December 28, 1992.

United States Environmental Protection Agency. 2015. *40 CFR Parts 257 and 261 Hazardous and Solid Waste Management Disposal System; Disposal of Coal Combustion Residual from Electric Utilities, Final Rule*. April 2015.