

May 20, 2024

Sent via email

Mr. Michael S. Regan
EPA Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code 5304-P
Washington, DC 20460

**Withdraw of Application for Alternate Liner Demonstration
Coal Combustion Residuals Rule Compliance
Ash Filter Ponds A, B, C, and D (existing CCR surface impoundments)
Conemaugh Generating Station
West Wheatfield Township, Indiana County, Pennsylvania**

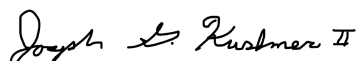
Dear Administrator Regan:

On December 7th, 2020, Conemaugh Generating Station ("Conemaugh" or "the Station") submitted an application to the U.S. Environmental Protection Agency (EPA) for approval to submit an Alternate Liner Demonstration (ALD) pursuant to 40 C.F.R. § 257.71(d)(1)(i), for Ash Filter Ponds (AFPs) A, B, C, and D located at the Station in Indiana County, Pennsylvania (PA). On January 30, 2023, the EPA proposed to deny Conemaugh's application. Conemaugh submitted comments to EPA's proposed denial on April 10, 2023, and met virtually with EPA Headquarters and Region 3 throughout 2023 to discuss EPA's proposed denial of the application.

Subsequently, Conemaugh voluntarily began a project to retrofit three of the four AFPs. In March 2023, Conemaugh posted its CCR Impoundment Liner Design Certification and Retrofit Plan for AFPs B and C on its publicly accessible CCR website, and subsequently began retrofitting AFP B and C, with liner systems that are compliant with the requirements of Title 40, Part 257, Subpart D. In January 2024, Conemaugh posted its CCR Impoundment Liner Design Certification and Retrofit Plan for AFP A on its public CCR website. AFP A has been removed from service, cleaned of all CCR material, and is currently in the process of being retrofitted. AFP D has been isolated from the bottom ash system and cleaned of all CCR and non-CCR materials. Thereafter, the Station initiated closure activities, which are expected to be completed following Station retirement in 2028.

Due to status of the AFPs, as described herein, Conemaugh is withdrawing its CCR Part B application to submit an Alternate Liner Demonstration. This notice has been prepared pursuant to 40 C.F.R. § 257.105(f)(14). If you have any questions, please contact me at 724.235.4529 or jkushner@keyconops.com.

Sincerely,



Joseph Kushner, P.E.
Strategy and Compliance Manager, Conemaugh Generating Station