

INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

FOR

ASH BASIN NO. 1

**MONTOUR STEAM ELECTRIC STATION
DERRY TOWNSHIP, MONTOUR COUNTY, PENNSYLVANIA**

Prepared for:

MONTOUR LLC

October 14, 2016

TABLE OF CONTENTS

	Page
1.0 Purpose	1
2.0 Site Description.....	1
3.0 Document Review and Basis for Classification	2
4.0 Certification	3
5.0 References.....	3

1.0 PURPOSE

The purpose of this document is to assess, document, and certify the hazard potential classification for Montour Steam Electric Station (SES) Ash Basin 1, which is an existing CCR surface Impoundment. The requirement for this document is provided under Section §257.73(a)(2) of the United States Environmental Protection Agency (USEPA) 40 CFR Parts §257 and §261 Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule, dated April 17, 2015 (CCR Rule).

40 CFR Section §257.73(a)(2) states that the owner or operator of the CCR unit must conduct initial and periodic hazard potential classification assessments of the CCR unit according to the timeframes specified in paragraph (f) of this section. The owner or operator must document the hazard potential classification of each CCR unit as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment. The owner or operator must also document the basis for each hazard potential classification.

2.0 SITE DESCRIPTION

Montour, LLC (Montour), which is a subsidiary of Talen Generation, LLC, operates a coal combustion residuals (CCR) management facility, known as Ash Basin 1, at their SES near Washingtonville, Pennsylvania. Basin 1 is regulated under the Pennsylvania Residual Waste Regulations of Title 25 PA Code, Chapters 287 and 289. Basin 1 is permitted as a PADEP Class II Residual Waste Disposal Impoundment. Basin 1 is operated under Permit No. 301315. Basin 1 is also regulated by the PADEP Bureau of Waterways Engineering Division of Dam Safety under Permit No. 47-009 and under the National Pollutant Discharge Elimination System (NPDES) Permit No. PA0008443.

Basin 1 went into service in 1971 and was developed by excavating site soils to construct an embankment dike around the excavation. The top of the dike is set at Elevation 564 (NGVD 1929). The perimeter of Basin 1 is approximately 11,000 feet in length and up to approximately 40 feet high. The dike ties into natural grade along the eastern side of the basin.

3.0 DOCUMENT REVIEW BASIS FOR CLASSIFICATION

Talen reviewed documents located within the History of Construction for Montour SES Ash Basin 1, which included a document entitled “Hydrologic and Hydraulic Report with Dam Break Analysis for Montour S.E.S. Ash Basin 1” and drawing E382060 Sheet 1 of 1 which is an inundation map showing the extent an inundation area caused by a Probable Maximum Flood with and without a dam break. Talen compared the record documents to existing conditions as of September, 2016 and determined that the existing surface impoundment shall be classified as a “high hazard potential CCR surface impoundment” due to nearby residences located adjacent to the surface impoundment’s East Dike which are shown within the inundation mapping. Below is an aerial image showing the limits of a theoretical PMF flood with a dam break at the location of the residences near the dam.

Aerial 3 – Inundation Area – PMF STORM Dam Break at Toe



This high-hazard potential agrees with the PADEP Bureau of Waterways Engineering Division of Dam

Safety's classification as a B-1 dam, corresponding to a medium-sized, high-hazard-potential dam.

4.0 CERTIFICATION

The following is provided in accordance with Section 257.73(a)(2)(ii) of the CCR Rule.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the Commonwealth of Pennsylvania and that it is within my professional expertise to verify the correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Benjamin R. Wilburn, P.E.

P.E. License Number: PE080739

Signature: *Benjamin R. Wilburn*

Date: 10/14/2016



5.0 REFERENCES

1. Geosyntec Consultants. History of Construction Report.
2. Hydrologic and Hydraulics Report with Dam Break Analysis for Montour S.E.S. Ash Basin 1
3. Drawing E382060 Sheet 1 of 1