

From: [Frank, Stephen](#)
To: ["cwilhelm@pa.gov"](mailto:cwilhelm@pa.gov); ["Fair, Joel"](#)
Cc: ["Tarquino Morris, Ali"](#); [Brown, Steven W.](#); [Schmidt, Keith A.](#); [Schenker, Jeremy S.](#); [Panzino, Kevin P.](#); [Shott, David \(David.Shott@aptim.com\)](#); [Southorn, Richard \(Richard.Southorn@aptim.com\)](#)
Subject: Federal CCR Notification - Notice of Appendix IV Detection Greater Than GWPS - 40 CFR 257.95(g)
Date: Friday, April 12, 2019 8:51:57 AM
Attachments: [image001.png](#)
[Alt. Source Demo NC North Bottom Ash Pond \(Certified Final 4-9-19\).pdf](#)

Christina and Joel,

Pursuant to EPA's CCR Rule at 40 CFR Part §257.95(g), §257.105(h)(8) and §257.106(h)(6), GenOn Power Midwest LP is providing notice that we have detected arsenic, an Appendix IV constituent, at a statistically significant level (SSL) above the groundwater protection standard (GWPS) in downgradient compliance wells at the North Bottom Ash Pond located at the New Castle Generating Station.

In addition, an Alternate Source Demonstration (ASD) in accordance with the provisions of §257.95(g)(3)(ii) was conducted to determine if a source other than the North Bottom Ash Pond caused the contamination. As described in our April 2019 ASD and as certified by a qualified professional engineer, a historic impoundment was, at one time, located just north of this unit and was demonstrated to be the source of the arsenic observed in the North Bottom Ash Pond CCR groundwater monitoring network.

The historic impoundment is a feature recognized by the Pennsylvania Department of Environmental Protection (PADEP) to contribute to groundwater impacts, particularly arsenic, in the area north of the Station. These impacts and the required monitoring/reporting actions are detailed in the Station's Solid Waste Permit No. 300818 (issued December 20, 2017), and further memorialized in the Consent Order and Agreement (dated August 3, 2006) between PADEP and Orion Power Midwest LP (predecessor to the current operating entity GenOn Power Midwest LP).

As a result of the ASD, sampling under the CCR Assessment Monitoring program will continue for this unit. Also, as indicated in our March 29th Notice, we have initiated the closure by removal of CCR of the North Bottom Ash Pond and expect to complete closure in 2019. CCR has been removed from the North Bottom Ash Pond. The ASD will be included in the Annual Groundwater Monitoring and Corrective Action Report [per §257.90(e)], which is to be prepared by January 31 of each year.

Per the requirements of §257.107(h)(6), this notice will be available within 30 days on our public website: <https://www.genon.com/ccr-rule-compliance/>.

Should you require additional information or if you would prefer to have these notices provided to other contacts at the Department, please do not hesitate to contact us.

Thank you, Steve

Stephen M. Frank, PE (Pa)



Senior Manager, Environmental
724-249-3610

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