

CONSTRUCTED LINER DETERMINATION REPORT

FOR

ASH BASIN NO. 6

**BRUNNER ISLAND STEAM ELECTRIC STATION
EAST MANCHESTER TOWNSHIP, YORK COUNTY, PENNSYLVANIA**

Prepared for:

BRUNNER ISLAND, LLC

September 29, 2016

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1.0 PURPOSE

The purpose of this certification is to document whether or not the Brunner Island, LLC - Steam Electric Station (SES) Ash Basin 6, which is an existing CCR surface Impoundment, was constructed with a liner that meets the requirements of Sections §257.71(a)(1)(i),(ii), or (iii) 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). An existing CCR surface impoundment is considered to be an existing unlined CCR surface impoundment if it is determined that the unit was not constructed per the requirements of 40 CFR Sections §257.71(a)(1)(i),(ii), or (iii).

40 CFR Sections §257.71(a)(1)(i),(ii), or (iii) states that a surface impoundment is considered lined if it was constructed with (i) a liner consisting of a minimum of two feet of compacted soil with a hydraulic conductivity of no more than 1×10^{-7} cm/sec; (ii) a composite liner that meets the requirements of §257.70(b); or (iii) an alternative composite liner that meets the requirements of §257.70(c).

2.0 SITE DESCRIPTION

Brunner Island, LLC (Brunner Island), which is a subsidiary of Talen Generation, LLC (Talen), operates a coal combustion residuals (CCR) management facility, known as Ash Basin 6, at their SES in East Manchester Township, York County, Pennsylvania. Ash Basin 6 is regulated under the Pennsylvania Residual Waste Regulations of Title 25 PA Code, Chapters 287 and 289. Ash Basin 6 is permitted as a PADEP Class II Residual Waste Disposal Impoundment and is operated under Permit No. 301300. Ash Basin 6 is also regulated by the PADEP Bureau of Waterways Engineering Division of Dam Safety under Permit No. 67-496 and is included under the Brunner Island SES National Pollutant Discharge Elimination System Permit No. PA0008281.

Ash Basin 6 was built in the late 1970's with a top of the dike set at elevation 290 feet (NGVD 1929). The perimeter dike of Ash Basin 6 is approximately 8,300 feet in length and up to approximately 30 feet high. The perimeter dike is constructed with earth fill and includes a 10-foot-thick clay liner covering the upstream slope from bedrock to elevation 287.5 feet.

3.0 DOCUMENT REVIEW

Talen reviewed documents located within the History of Construction for Brunner Island SES Ash Basin 6, which was prepared by Geosyntec Consultants per requirements of 40 CFR §257.7(c), and determined that the existing CCR surface impoundment was not constructed with a liner that meets the requirements of 40 CFR Sections §257.71(a)(1)(i),(ii), or (iii); therefore, Brunner Island SES Ash Basin 6 shall be considered an existing unlined CCR surface impoundment.

4.0 CERTIFICATION

The following is provided in accordance with Section 257.71(b) 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: 9/29/2016



9/29/2016

5.0 REFERENCES

1. Geosyntec Consultants. History of Construction Report.