COAL COMBUSTION RESIDUALS RULE SEMIANNUAL PROGRESS REPORT SELECTION OF REMEDY

FirstEnergy Generation, LLC Little Blue Run Disposal Facility Greene Township, Beaver County, PA / Grant District, Hancock County, WV December 18, 2019

This document has been prepared to satisfy the requirement in 40 CFR §257.97(a) of the United States Environmental Protection Agency Coal Combustion Residuals (CCR) Rule to prepare a semiannual report describing the progress in selecting and designing corrective measures to remediate a release to groundwater.

PROGRESS IN SELECTING A REMEDY

As documented in the Assessment of Corrective Measures dated June 2019, FirstEnergy Generation, LLC (FEG) completed an "Investigation and Economic/Technical Feasibility Assessment" that evaluated potential corrective measures to reduce or prevent groundwater impacts at the Little Blue Run Disposal Facility (LBR). The results of this investigation were submitted to the Pennsylvania Department of Environmental Protection (PADEP) in January 2013. The selected measures included early closure and capping the entire facility with a geomembrane liner. These measures have the benefits of separation of surface water run-on from the in-situ CCR and reduced infiltration of precipitation into the CCR. The reduced infiltration will result in a decreased water table within the CCR, which is expected to reduce seepage from the facility and corresponding improvements to groundwater quality. These measures were approved by PADEP in the facility's April 2014 Residual Waste Permit (Permit No. 300558).

In April 2016, FEG submitted a Groundwater Abatement Plan in accordance with the April 2014 Residual Waste Permit and 25 PA Code §289.267. The abatement approach presented in the Groundwater Abatement Plan was the closure of LBR and capping with a geomembrane liner in accordance with the April 2014 Residual Waste Permit. The PADEP has not yet approved the Groundwater Abatement Plan.

The abatement approach selected in accordance with the April 2014 Residual Waste Permit is consistent with the preferred corrective measures presented in the June 2019 Assessment of Corrective Actions prepared to meet requirements in 40 CFR §257.96 of the United States Environmental Protection Agency CCR Rule. With the concurrence of the PADEP, closure/capping and monitored attenuation is being implemented at LBR. For the purpose of having consistency between the Residual Waste Permit and the CCR Rule, FEG cannot select a corrective measure under the CCR Rule until the Groundwater Abatement Plan has been approved by the PADEP.

CERTIFICATION

We hereby certify to the best of knowledge, information, and belief that the above information satisfies the requirements of 40 CFR §257.97(a).

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