

# Former Milesburg Ash Disposal Basin Initial Hazard Potential Classification Assessment Report

West Penn Power Company  
Former Milesburg Power Station  
Centre County, Pennsylvania

May 2026

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## Certification/Statement of Professional Opinion

The Initial Hazard Potential Classification Assessment Report (Report) for the former Milesburg Ash Disposal Basin was prepared by GAI Consultants, Inc. (GAI). The Report was based on certain information that, other than for information GAI originally prepared, GAI has relied on, but not independently verified. Therefore this Certification/Statement of Professional Opinion is limited to the information available to GAI at the time the Report was written. On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the Commonwealth of Pennsylvania, that the Report has been prepared in accordance with good and accepted engineering practices as exercised by other engineers practicing in the same discipline(s), under similar circumstances, at the time, and in the same locale. It is my professional opinion that the Initial Hazard Potential Classification Assessment was prepared consistent with the requirements of § 257.73(a)(2) of the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015 and amended on May 8, 2024 with an effective date of November 8, 2024.

The use of the words "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion and is not and shall not to be interpreted or construed as a guarantee, warranty or legal opinion.



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Arica L. DiTullio, P.E.  
Engineering Director



## 1.0 Purpose

This Initial Hazard Potential Classification Assessment Report (Report) was prepared in accordance with the applicable requirements at § 257.73(a)(2) and § 257.100(f)(2)(iii) of the United States (US) Environmental Protection Agency's (EPA's) 40 Code of Federal Regulations (CFR) Part 257, Subpart D, *Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments* (CCR Rule). The purpose of this Report is to document the initial hazard classification determined for the former Milesburg Ash Disposal Basin (Ash Disposal Basin) as well as the basis for this determination.

## 2.0 Introduction

The former Ash Disposal Basin is located approximately 0.25 miles west of the former Milesburg Power Station (Station) which is an inactive electric utility located in the borough of Milesburg in Centre County, Pennsylvania (PA). The Station began operating in 1950 as a coal-fired generating station consisting of two 23 megawatt generating units. In 1974, the former Station was converted to oil. The former Station ceased generating electricity in 1984 and was maintained in cold reserve until 1988. The former Station was demolished around 1999. While the former Station was operational, the former Ash Disposal Basin was used for the management, storage, and disposal of coal combustion residuals (CCR).

In addition to storing CCR from when the former Station was operational, the former Ash Disposal Basin also impounds stormwater runoff from precipitation that falls directly within its footprint as well as the upslope watershed. The approximate area of the former Ash Disposal Basin is 19.9 acres, and the total drainage area for the former Ash Disposal Basin is approximately 132.3 acres. The available storage capacity of the former Ash Disposal Basin, assuming that the current topography resembles an empty pond, is approximately 104 acre-feet (4,523,000 cubic feet). The embankments that impound and store stormwater and past CCR disposed when the former Station was operational stand at an approximate elevation (El.) of 724 feet. A six-foot diameter corrugated metal pipe discharge riser exists in the western portion of the former Ash Disposal Basin at approximate El. 712.3 feet.

## 3.0 Hazard Classification

According to § 257.53 of the CCR Rule, the hazard potential classifications are:

- Low hazard, which means that “failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner’s property.”
- Significant hazard, where “failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.”
- High hazard, where “failure or mis-operation will probably cause loss of human life.”

The initial hazard classification of the former Ash Disposal Basin, pursuant to the CCR Rule, is assigned as a “significant hazard potential CCR surface impoundment” [40 CFR § 257.73(a)(2)]. This significant hazard potential classification was assigned because failure or mis-operation may cause environmental damage, economic loss, or impact other concerns.

## 4.0 Basis for Classification

GAI Consultants, Inc. (GAI) personnel performed a site reconnaissance of the former Ash Disposal Basin to verify site conditions and reviewed documents listed in the References (Section 5.0) of this Report to make this initial “significant hazard” classification.

GAI simulated an embankment failure analysis (*Reference 6*) to determine the predicted inundation due to a static failure during a condition in which the former Ash Disposal Basin is full of water on a day when zero precipitation occurs. The analysis indicated that CCR material and water released during a breach would spill into the adjacent Bald Eagle Creek. GAI's August 2025 analysis indicates that water and CCR material overtops the banks of Bald Eagle Creek at several locations modeled. Review of aerial imagery at the areas of simulated inundation shows that no critical structures are overtopped. Areas where the water overtops the banks appear to be forest and grass cover types. Some areas where the banks are overtopped are owned by others, as the former Ash Disposal Basin is located adjacent to and upgradient of properties owned by others.

There is a potential for environmental damage and economic loss due to release of CCR material through a breach. A breach flowing into the adjacent properties is not expected to cause a loss of human life but may cause economic loss and environmental damage due to areas where the CCR material may overtop the banks of Bald Eagle Creek. Additionally, a breach may cause environmental damage to Bald Eagle Creek itself. These criteria correspond to classification of the former Ash Disposal Basin as a significant hazard potential designation per the CCR Rule.

## 5.0 References

1. West Penn Power Company, *Drawing GA-59538 (Ash Disposal Pond Height Additions Proposed Schemes)*, April 20, 1970.
2. West Penn Power Company, *Drawing GA-59537 (Ash Disposal Basin – Discharge Pipe and Cut-Off Collar)*, July 1, 1970.
3. West Penn Power Company, *Drawing 400-516 (Milesburg Power Station Topographical Plan of Ash Disposal Area)*, August 24, 1971.
4. GAI Consultants, Inc., *Milesburg Ash Disposal Area Site Investigation*, June 1980.
5. Google Earth. Imagery for former Milesburg Ash Disposal Basin Legacy CCR Surface Impoundment, Centre County, Pennsylvania. Dated September 19, 2024.
6. GAI Consultants, Inc., *Calculation Brief: West Penn Power Company – Former Milesburg Ash Disposal Basin – Inundation*, August 29, 2025
7. GAI Consultants, Inc., *Former Milesburg Ash Disposal Basin History of Construction*, February 2026.