Sunbury Generation LP

January 31, 2011

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Ave, NW
Washington DC 20460 17105-8554

Dear Mr. Hoffman:

On January 7, 2011 Sunbury Generation LP received the Final Report from the Environmental Protection Agency relative to an inspection conducted on May 10 and 11, 2010 by O'Brien & Gere at our ash impoundment area.

We would like to thank the agency for taking into consideration our comments in reference to the original draft report. Secondly, we wanted to provide you with some information relative to your letter in regards to the written recommendations.

We have contacted the PADEP Bureau of Waterways Engineering for assistance. Specifically, we have requested assistance in :

- Determining if the trees and woody vegetation need to be removed from the eastern embankment
- Defining the types of analysis are required i.e., breach analysis, spillway capacity analysis, slope stability analysis
- Defining Emergency Action Plan requirements
- Operations and Maintenance Plan development and requirements
- Internal and External Inspection Requirements
- Development of an appropriate timeline for the implementation of these recommendations

In addition, we have begun the process of contacting engineering firms who specialize in these types of Coal Combustion Residual Site Assessments to evaluate the types of analysis needed. Due to current winter conditions these evaluations may be conducted during spring and summer conditions. Also, we will continue to perform our daily and quarterly inspections in accordance with our PADEP #301306 Solid Waste Permit.

Please note that in the recommendation letter two items need to be addressed. The facility is listed as WPS Sunbury Generating Station. The facility was sold by WPS in July of 2006 and the current proper name for the facility is Sunbury Generation LP. Additionally, the timeline for the completion of the recommended actions was listed in the letter as being required by the end of 2010. We assume that the correct completion date is by the end of 2011.

P.O. Box 517, Old Trail Road • Shamokin Dam, PA 17876 • (570) 884-1200 • Fax (570) 884-1207

We look forward to working with PADEP and the EPA on these items, and have attached our letter to PADEP for your review. You may reach our Environmental Manager, Mark Crawford at 570-884-1247. He will be our representative during this process and will assist the department in these matters. Thank you in advance for your assistance.

Sincerely,

Edward Griegel
Vice President-Operations

encl: PADEP Letter 1-24-11

Sunbury Generation LP

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January 24, 2011

Mr. Kirk Kreider, P.E
Civil Engineering Manager
Bureau of Waterways Engineering
Rachel Carson State Office Building
PO Box 8554
Harrisburg, PA 17105-8554

Dear Mr. Kreider:

On January 7, 2011 Sunbury Generation LP received the Final Report from the Environmental Protection Agency relative to an inspection conducted on May 10 and 11, 2010 by O'Brien & Gere at our ash impoundment area in Sunbury, PA.

As part of this report, specific recommendations were made requiring Sunbury Generation LP to work with the PADEP Division of Dam Safety to address several issues. The purpose of this letter is to request your assistance in evaluating the recommendations as listed in the report, specifically;

- Determining if the trees and woody vegetation need to be removed from the eastern embankment
- Defining the types of analysis are required i.e., breach analysis, spillway capacity analysis, slope stability analysis
- Emergency Action Plan requirements
- Operations and Maintenance Plan development and requirements
- Internal and External Inspection Requirements
- Assist us in development of an appropriate timeline for the implementation of these recommendations

As part of the reports requirements, we will be corresponding with Mr. Steven Hoffman, EPA on the recommendations. We look forward to working with the department on these items, and have attached the EPA letter for your review. You may reach our Environmental Manager, Mark Crawford at 570-884-1247. He will be our representative during this process and will assist the department in these matters. Thank you in advance for your assistance.

Sincerely,

Edward Griegel
Vice President-Operations

encl: EPA Letter 1-7-11

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