

**Brunner Island, LLC
REGULATORY DELIVERABLE
SUBMITTAL COVER SHEET**

Date:		Transmittal No.:	
DOCUMENT DESCRIPTION:			
CONSENT DECREE REFERENCE:		Paragraph No.:	
BRIEF DESCRIPTION OF OUTLINED REQUIREMENT:			
RECIPIENT(S):			
NAME:		ORGANIZATION:	
Brunner Island, LLC Contact Name:			
Brunner Island, LLC Contact Phone:			
Mailing Address: Brunner Island, LLC P. O. Box 221 York Haven, PA 17370		Street Address: Brunner Island, LLC 1400 Wago Road Mt. Wolf, PA 17347	



John Forbes • Plant General Manager – Brunner Island SES • Talen Generation, LLC
PO Box 221 • York Haven, PA 17370-0221
(717) 266-7510 • John.Forbes@talenergy.com

December 19, 2019

Maria Bebenek, P.E.
Pennsylvania Department of Environmental Protection
Clean Water Program
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110

BRUNNER ISLAND, LLC – STORMWATER TOTAL NITROGEN SAMPLING PLAN

Dear Ms. Bebenek:

Enclosed is the Stormwater Total Nitrogen Sampling Plan for Brunner Island Steam Electric Generating Station. This document is required per Paragraph 40 of the Consent Decree signed July 31, 2019 and entered November 8, 2019.

Should you have any questions regarding the Stormwater Total Nitrogen Sampling Plan, please contact me or Marcia Thiess, Regulatory Affairs Senior Professional, at (717) 268-1531 (email: marcia.thiess@talenergy.com).

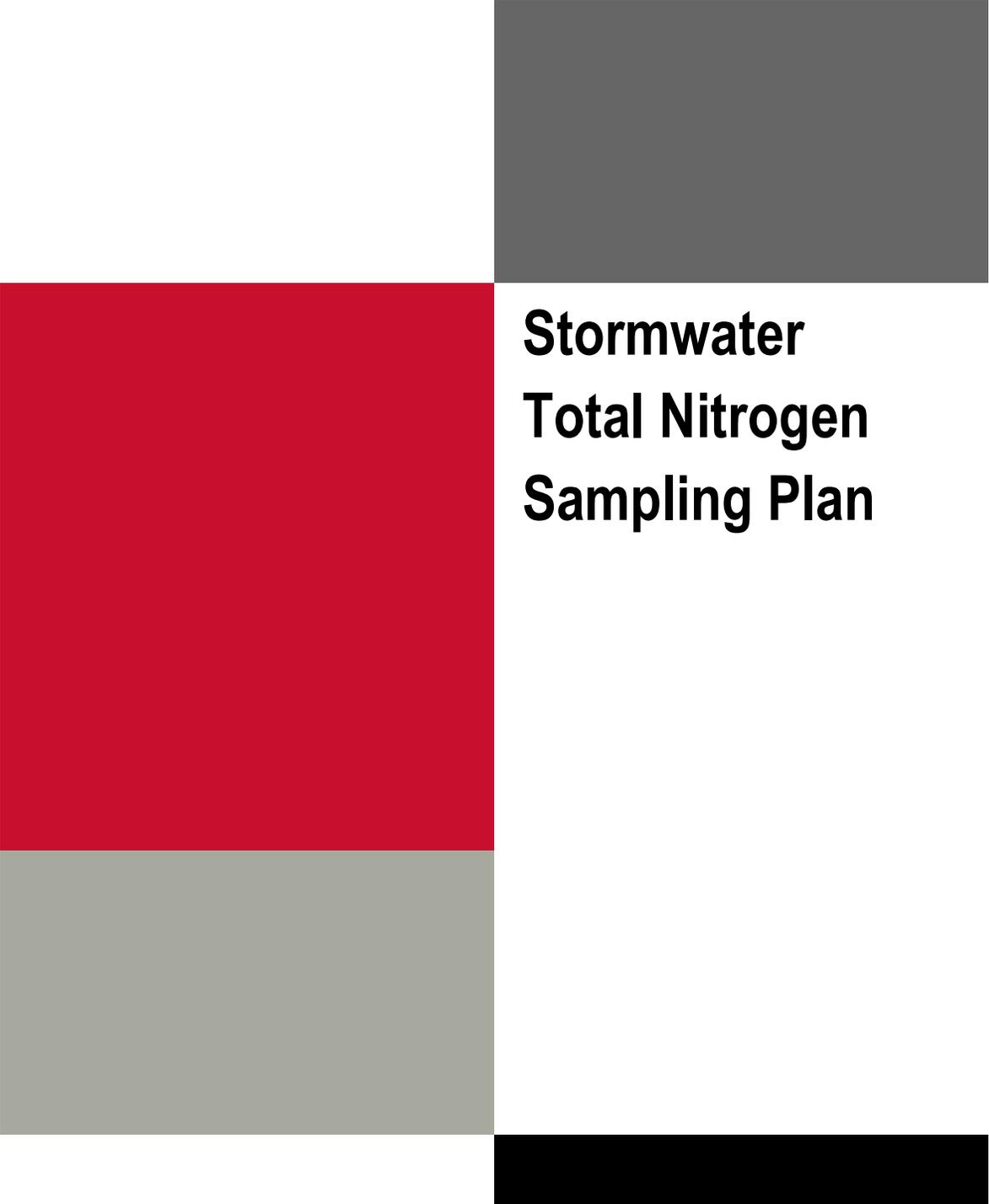
Sincerely,

A handwritten signature in blue ink, appearing to read "John Forbes".

John Forbes
Plant General Manager

Enclosures

Cc: M. Thiess TALEN (BRUPT)
C. Shamory TALEN (CORP)
T. Weissinger TALEN (CORP)



**Stormwater
Total Nitrogen
Sampling Plan**

Description

As required under Paragraph 40 of the Consent Decree signed July 31, 2019 and entered on November 8, 2019, Brunner Island, LLC (Brunner Island) has prepared this Sampling Plan to sample each stormwater outfall once for Total Nitrogen. Upon approval from the Department, Brunner Island will implement this Sampling Plan in accordance with the schedule provided in Table 1. The monitoring results are solely for informational purposes, since Brunner Island is currently only required to purchase Nitrogen credits for Outfall 007, and the portion of flow from Outfall 007 that will be redirected to Outfall 008 pursuant to Paragraph 39(c) of the Consent Decree.

The stormwater sampling protocol for Total Nitrogen will be in accordance with Brunner Island's existing NPDES permit, Part C, Section IV, Item F (Stormwater Monitoring Requirements), and samples will be analyzed by a Department-certified independent testing laboratory. Samples will be collected at Brunner Island's amended permitted stormwater outfall locations, as shown on Figure 1, per the NPDES permit amendment application submitted to the Department on October 29, 2019. The amended stormwater outfall locations and/or designations differ from the previously permitted stormwater outfall locations and/or designations as follows:

1. Stormwater Outfall 006 has been removed from the permit;
2. The location coordinates of Stormwater Outfall 021 have been corrected;
3. Stormwater Outfalls 012, 013, and 014 as listed in the previous permit have been combined into Stormwater Outfall 030; and
4. Stormwater Outfalls 030, 031, 032, 033, and 034 have been added to the permit.

The requirements for this Sampling Plan are as follows:

1. Brunner Island will collect samples from discharges resulting from a storm event that is greater than 0.1 inch in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. The 72-hour storm interval is waived when the preceding storm did not yield a measurable discharge, or if Brunner Island is able to document that a less than 72-hour interval is representative for local storm events during the sample period.
2. Brunner Island will collect grab samples within the first 30 minutes of a discharge, unless Brunner Island determines that this is not possible, in which case grab samples will be collected as soon as possible after the first 30 minutes of a discharge.
3. Brunner Island will collect stormwater samples at times when commingling with non-stormwater discharges is not occurring or at locations prior to the commingling of non-stormwater discharges, unless the stormwater outfall(s) being sampled are recognized in the permit as one(s) where the commingling of stormwater and non-stormwater discharges occurs.

4. In order to obtain Total Nitrogen concentration, samples must be analyzed for nitrate, nitrite, and Total Kjeldahl Nitrogen (TKN). At the time of sampling for each stormwater outfall, Brunner Island will collect one (1) grab sample in a 250 mL plastic bottle (with no preservatives) to be analyzed for nitrate; one (1) grab sample in a 250 mL plastic bottle (with no preservatives) to be analyzed for nitrite; and one (1) grab sample in a 500 mL plastic bottle with sulfuric acid preservative to be analyzed for TKN. The method used for nitrate and nitrite analysis will be EPA Method 300.0; the method used for TKN analysis will be Standard Method 4500-NH3-F.
5. The samples will be analyzed within the allowable holding time requirements. Samples will be properly labeled and refrigerated after collection and prior to analysis.

Samples will be collected at each permitted stormwater outfall location, if possible. In some cases, samples may be collected at stormwater basin risers to ensure there is no commingling with non-stormwater discharges. In these cases, the exact sample location will be documented and reasoning will be provided as to why a sample was taken at the adjusted location. If a measurable storm event occurs and a stormwater outfall has no discharge, a condition of No Discharge will be recorded.

During stormwater sampling, the following information will be recorded for each outfall:

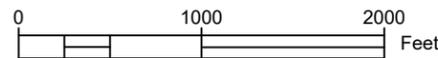
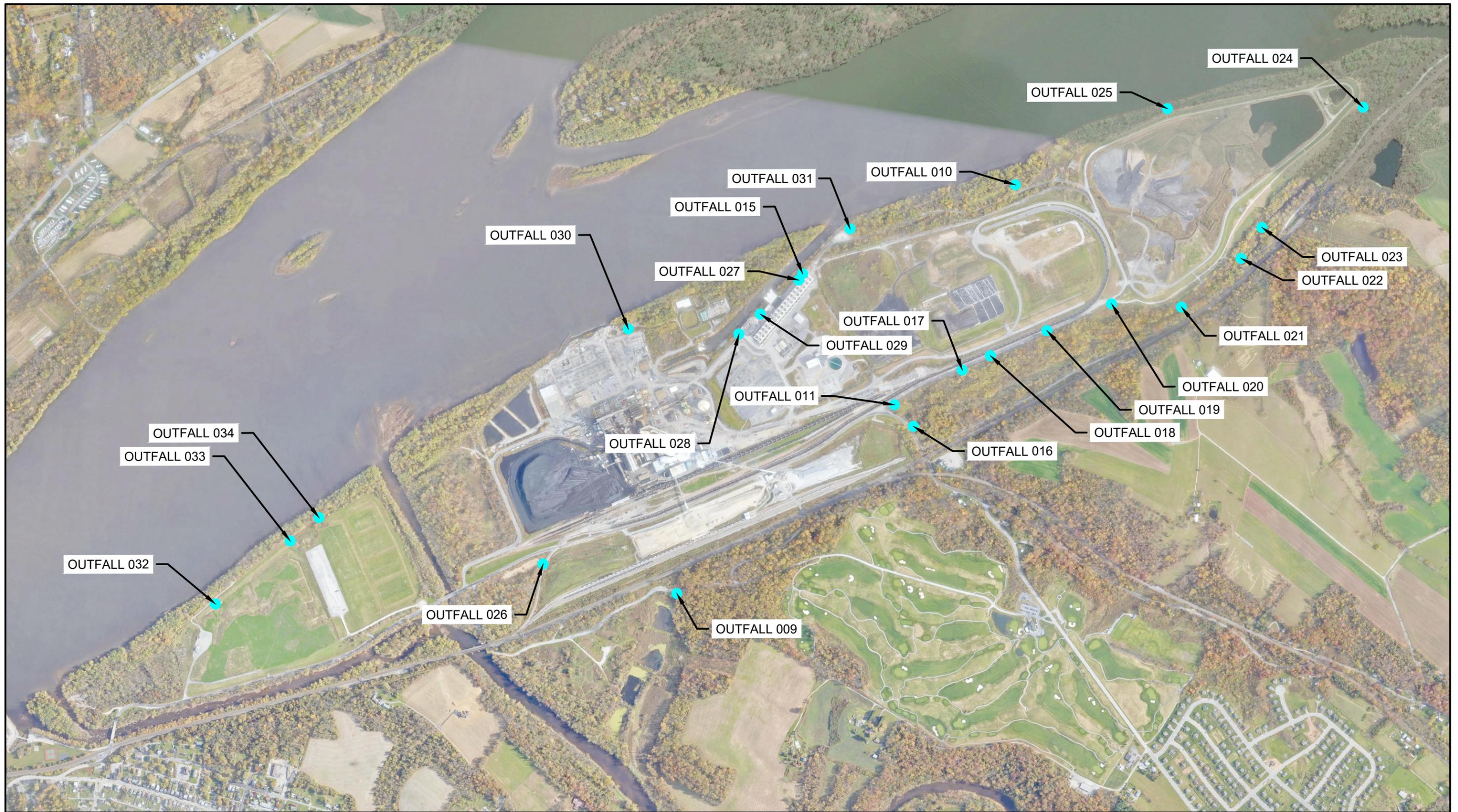
1. Date and time of storm event and sample collection;
2. Sampling location;
3. Duration of storm event (minutes);
4. Total rainfall amount for storm event (inches);
5. Number of hours from the end of the previous measurable storm event to the beginning of the storm event in which samples are being collected; and
6. Condition of No Discharge, if applicable.

The stormwater outfalls to be sampled once for Total Nitrogen are shown on Figure 1 of this Sampling Plan. The proposed stormwater sampling schedule for Total Nitrogen is provided in Table 1.

Table 1. Proposed Stormwater Sampling Schedule.

Task	Date
Brunner Island to Submit Stormwater Sampling Plan to the Department for Review and Approval	No later than January 7, 2020 ¹
Brunner Island to Perform Stormwater Sampling	No later than 90 days from Department approval of Sampling Plan, unless no adequate storm event(s) occur during this time period

¹ This date corresponds to 60 days from entry of the Consent Decree signed July 31, 2019.



BRUNNER ISLAND STEAM ELECTRIC STATION
 FIGURE 1 - AMENDED STORMWATER
 SAMPLING LOCATIONS

LEGEND
 ● AMENDED STORMWATER
 OUTFALL SAMPLING LOCATIONS