

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

<b>Date:</b>		<b>Transmittal No.:</b>	
<b>DOCUMENT DESCRIPTION:</b>			
<b>CONSENT DECREE REFERENCE:</b>		Paragraph No.:	
<b>BRIEF DESCRIPTION OF OUTLINED REQUIREMENT:</b>			
<b>RECIPIENT(S):</b>			
<b>NAME:</b>		<b>ORGANIZATION:</b>	
<b>Brunner Island, LLC Contact Name:</b>			
<b>Brunner Island, LLC Contact Phone:</b>			
<b>Mailing Address:</b>  Brunner Island, LLC P. O. Box 221 York Haven, PA 17370		<b>Street Address:</b>  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@talenenergy.com](mailto:John.Forbes@talenenergy.com)

May 5, 2020

Mr. Anthony Rathfon  
PA Department of Environmental Protection –  
SCRO  
Waste Program  
909 Elmerton Avenue  
Harrisburg, PA 17110

Ms. Maria Bebenek  
PA Department of Environmental Protection –  
SCRO  
Clean Water Program  
909 Elmerton Avenue  
Harrisburg, PA 17110

Ms. Mary E Greene  
Deputy Director  
Environmental Integrity Project  
1000 Vermont Avenue, NW, Ste. 1100  
Washington, D.C. 20005

**BRUNNER ISLAND, LLC – Annual Status Report – Consent Decree  
Transmittal via Email**

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Dear Mr. Rathfon, Ms. Bebenek and Ms. Greene:

In accordance with the Consent Decree dated July 31, 2019 and entered by the court on November 8, 2019 (Civil Action No. 1:19-cv-03124-CCC and Civil Action No. 1:19-cv-01329-JEJ) Section X, Paragraph 45, Brunner Island, LLC (Brunner), is submitting the enclosed Annual Status report.

Should you have any questions regarding this submittal, please call me or Marcia Thiess at (717) 268-1531 or email her at [marcia.thiess@talenenergy.com](mailto:marcia.thiess@talenenergy.com).

Sincerely,

A handwritten signature in black ink that reads "John Forbes". The signature is written in a cursive style with a long horizontal stroke at the end.

John Forbes  
Plant General Manager

Enclosures

Cc: Marcia Thiess TALEN (BRUPT)  
Debra Raggio TALEN (CORP) (via email)  
Dave Paulin TALEN (CORP) (via email)  
Bonnie Barnett Drinker Biddle & Reath LLP (via email)  
Tom Weissinger TALEN (CORP) (via email)

**ATTACHMENT**  
**SUMMARY—COMPLETED CONSENT DECREE MILESTONES**

**Brunner Island Annual Status Report  
Pursuant to the Consent Decree entered on November 8, 2019**

Item #	Consent Decree Section	Consent Decree Paragraph	Subject	Description of Requirement	Deadline / Milestone	Description of Progress	Identification of / Reasons for Noncompliance	Additional Comments
1	VIII	9(a)	Seep Inspections	Within 90 days of lodging of this Consent Decree, Brunner shall complete a visual inspection of Ash Basins 5 and 6 and Disposal Area 8 to locate, identify, and estimate flow of current seeps in those areas. Brunner shall provide the Department and Citizens the results of the initial seep inspection (location and estimates of flow) within 30 days of collection for informational purposes only. Brunner shall conduct this visual inspection quarterly for the first year after entry of this Consent Decree and submit an initial report ("Initial Seep Report") to the Department cataloguing the results of the investigation within 90 days of the last quarterly inspection.	1st qtrly Seep Inspection by 10/23/2019	Initial seep inspections conducted on 10/22 and 10/23.	N/A	None
					Provide Initial Seep Inspection (location and estimates of flows) by 11/22/2019	Report on 1st quarter location and flow estimate of Seeps to DEP & Citizens for informational purposes sent to DEP and EIP on 11/21/2019.	N/A	None
					2nd qtrly Seep Inspection by 1/20/2020	Inspection completed on 1/20/2020.	N/A	None
					3rd qtrly Seep Inspection by 4/19/2020	Inspection completed on 4/16/2020.	N/A	None
					4th qtrly Seep Inspection by 7/15/2020	Scheduled to be conducted by 7/15/2020	N/A	None
					Initial Seep Report by 10/13/2020 (90 days from 4th quarterly inspection)	Scheduled to be completed and submitted by 10/13/2020	N/A	None
2	VIII	12	Basin 6	By agreement of the Parties prior to the lodging of the Consent Decree, Brunner ceased discharging wastewater into Ash Basin 6 on June 1, 2019. By June 1, 2021, Ash Basin 6 shall be dewatered. By December 31, 2031, Brunner shall complete the excavation of the contents of Ash Basin 6.	<u>6/1/19</u> - Cease discharging water in to Ash Basin 6 <u>6/1/21</u> - Complete dewatering of Ash Basin 6 <u>12/31/31</u> -Complete excavation of contents of Ash Basin 6	<u>Cease the discharge of water into Ash Basin 6 by 6/1/19</u> - discharge of water into Ash Basin 6 was ceased on 5/31/19. <u>Complete Dewatering of Ash Basin 6 by 6/1/21</u> : The majority of the water has been removed from the pond. The water level within the ash continues to drop. <u>Complete excavation of the contents of Ash Basin 6 by 12/31/31</u> : excavation continues.	N/A	None
3	VIII	14	Basin 6	Brunner shall continue to monitor groundwater in the Ash Basin 6 area throughout the dewatering and excavation process in accordance with Brunner's Sampling Analysis Plan and the Pennsylvania Residual Waste Regulations at 25 Pa. Code §§ 289.261-289.265.	Ongoing: monitor groundwater in accordance with Brunner's Sampling Analysis Plan and the Pennsylvania Residual Waste Regulations at 25 Pa. Code §§ 289.261-289.265.	Ground water monitoring continues in accordance with Brunner's Sampling Analysis Plan and the Pennsylvania Residual Waste Regulations at 25 Pa. Code §§ 289.261-289.265.	N/A	None
4	VIII	17	Area 8 Landfill	COCs have been detected in the leachate detection zone beneath Disposal Area 8. Within 45 days of entry of this Consent Decree, Brunner shall submit to the Department a proposal for interim measures to address contaminants in the leachate detection zone beneath Disposal Area 8. Effective upon Department approval, Brunner shall implement the interim measures. Within 180 days of entry of this Consent Decree, Brunner will submit to the Department a Landfill Operations and Improvement Plan, which shall be implemented after Department approval, and receipt of all necessary permits, in accordance with the schedule in the approved Plan. The goal of the Plan is to ensure that the liner and leachate collection system meet the conditions in Brunner's residual waste permit and are in full compliance with Applicable Environmental Laws.	Submit proposal to DEP for Interim Measures to address contaminants in the leachate detection zone beneath Disposal Area 8 by 12/23/2019	Interim Measures Proposal submitted to DEP on 12/18/2019. DEP approval of the Interim Measures Proposal received on 2/4/2020.	N/A	None
					Implement approved Disposal Area 8 Interim Measures Proposal. Per DEP approval received on 2/4/2020, submit a Form 19R for certification of construction activity upon completion of modifications.	There are 3 parts to the approved Plan. (1) inspect boot (2) replace flow meters (3) replace pumps. (1) was completed on 4/16/20. On 4/16/2020 Chesapeake Containment Systems, Inc. performed an inspection of the "boot" located at the liner penetration for the leachate detection zone sump. Three holes were identified and repaired. Part (2) and (3) to replace the flow meters and pumps will be completed prior to the 11/4/20 Plan deadline.	N/A	None
					Submit to DEP a Landfill Operations and Improvement Plan by May 6, 2020.	The Landfill Operations and Improvement Plan is currently being developed and will be submitted by May 6, 2020.	N/A	None
5	VIII	21	Basin 4	Within 90 days of entry of this Consent Decree, Brunner shall submit to the Department a work plan for the repair of Basin 4 South's grout wall along with applications for any needed Department permit applications. The work plan may consider, as appropriate, the safety, feasibility and effectiveness of the repairs, given current site conditions.	Submit a work plan for the repair of Basin 4 South grout wall by 2/6/2020.	The Work Plan was submitted to the DEP on 2/6/20	N/A	None

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6	VIII	29	Basin 5	Within 120 days of entry of this Consent Decree, Brunner shall submit a work plan, for Department approval, for any additional assessment and recommended abatement actions for the northern portion of Ash Basin 5, including the Pyrite Tomb and the bottom ash processing area.	Submit a work plan for any additional assessment and recommended abatement actions for the northern portion of Ash Basin 5, including the Pyrite Tomb and the bottom ash processing area by 3/7/2020	The Plan was submitted to the DEP on 3/6/20	N/A	None
7	VIII	30	Basin 5	The work plan will include a summary of the permitting history for, construction of, and data relevant to, the Pyrite Tomb. The work plan shall recommend abatement actions for the Ash Basin 5 area to limit infiltration and contaminant migration from the northern portion of Ash Basin 5, including from the Pyrite Tomb and bottom ash processing area. Upon Department approval of the work plan, Brunner shall apply for all necessary permits and implement the plan in accordance with the schedule in the work plan and applicable permits.	See above, Item 6	The Plan was submitted to the DEP on 3/6/20	N/A	None
8	VIII	35	Basin 7	Within 90 days of entry of this Consent Decree, Brunner shall provide the Department with a summary of actions taken at Ash Basin 7, along with a plan for any additional assessment (including assessing the existence of "hot spots," i.e., isolated areas of highly-elevated contaminants, including but not limited to, arsenic and boron) and recommended abatement actions for the area around Monitoring Well 7-5. Upon approval by the Department, Brunner shall apply for any required permits and implement the plan in accordance with the scope and schedule in the approved work plan and applicable permits.	Submit to the DEP a summary of actions taken at Basin 7, and plan for additional assessment and recommended abatement actions for the area around Monitoring Well 7-5 by 2/6/2020.	The Plan was submitted to the DEP on 2/6/20	N/A	None
9	VIII	37	Black Gut Creek	Within 90 days of entry of this Consent Decree, Brunner shall submit to the Department for review and approval an Environmental Monitoring Plan for Black Gut Creek consisting of surface water sampling for COCs and macroinvertebrate sampling, and any other parameters required by the Department's Water Quality Monitoring Protocols for Streams and Rivers (2018). Sampling shall be conducted two (2) times per year (once in Spring and once in the Fall as defined in the Department's macroinvertebrate sampling protocol) during the 2-year period when Ash Basin 6 is being dewatered and will follow the Department's macroinvertebrate and surface water sampling protocols as referenced above. Brunner shall share the results of the surface water sampling with the Department and Citizens within 90 days of each sampling event. Brunner will prepare and submit to the Department an assessment report of the sampling activities within 6 months of completing the two-year study, along with a recommendation for follow-up actions, if any.	Submit Black Gut Creek Environmental Monitoring Plan by 2/6/2020.	The Black Gut Creek Environmental Monitoring Plan was submitted to the DEP on 2/6/20. The Plan was approved by the DEP on 4/2/20. On 4/16/20, Normandeau conducted the 1st of four Black Gut Creek sampling events. Results of the surface water sampling will be shared with the DEP and Citizens within 90 days of the sampling event (7/15/20).	N/A	None
10	IX	38	Sewage Treatment Plant - Outfall 003	Within 120 days of entry of the Consent Decree, Brunner shall submit to the Department, for review and approval, an Operation and Maintenance Improvement Plan for the BISES Sewage Treatment Plant that discharges to Outfall 003. The purpose of the plan is to identify steps to improve the Sewage Treatment Plant's compliance with the effluent limitations in Brunner's NPDES permit. Brunner shall implement the plan after approval by the Department, and the issuance of any necessary permits, in accordance with the schedule in the approved plan.	Submit a Sewage Treatment Plant (STP) Operation and Maintenance Improvement Plan by 3/7/2020.	The STP Operation and Maintenance Improvement Plan was submitted to the DEP on 3/6/20. Conditional approval of the Maintenance Improvement Plan was received from the DEP on 4/14/20, pending revision of the Plan to include provisions for WQM Permit applications as required by the proposed STP modifications as well as a revised implementation schedule. The revised STP Operation and Maintenance Improvement Plan resubmittal to the DEP is due 5/15/2020.	N/A	None

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11	IX	39	NPDES Permit Modification	Within 90 days of lodging of this Consent Decree, Brunner shall submit to the Department a request for a modification to its NPDES Permit to address the following: (a) Correct coordinates regarding Stormwater Outfall 021; (b) Removal of Outfall 006 from its NPDES permit; (c) Accounting for the Total Nitrogen and Total Phosphorus from Outfall 007 that will then be redirected and discharged from Outfall 008, along with any other modifications to effluent limits needed to account for the re-routing of the discharge from Disposal Area 8 to the Auxiliary Wastewater Treatment plant, as outlined in Paragraph 18; and (d) Identification, after an audit, of any additional regulated stormwater outfalls.	Submit a request for modification of the NPDES permit by 10/29/19.	A request for a modification of the NPDES Permit was sent to the DEP on 10/28/19, but DEP will also need to incorporate its review of the Outfall 001 sampling being conducted under Item #12 - CD Paragraph 41 to complete the permit modification.	N/A	None
12	IX	40	Total Nitrogen - Stormwater	Within 60 days of entry of the Consent Decree, Brunner shall submit to the Department, for review and approval, a plan to sample each stormwater outfall once for Total Nitrogen. Within 90 days of Department approval, Brunner shall undertake the sampling in accordance with the approved plan. The monitoring results are solely for informational purposes, since Brunner is currently only required to purchase Nitrogen credits for Outfall 007 (and that portion of the flow from Outfall 007 that will be re-directed to Outfall 008 pursuant to Paragraph 39.c., above). Unless there is a change to the current Chesapeake Bay TMDL, these monitoring results will not be utilized by the Department or the Citizens to require Brunner to conduct additional nutrient sampling beyond its NPDES permit requirements or as the basis of any enforcement action or citizens' suit.	Submit a Stormwater Sampling Plan for Total Nitrogen analysis to the DEP by 1/7/2020.	TN sampling Plan was submitted to the DEP on 12/19/19. DEP approval of the Total Nitrogen Stormwater Sampling plan was received on 1/7/20. Stormwater sampling was conducted on 3/19/20.	N/A	None
13	IX	41	NPDES Permit Updates	Within 60 days of entry of the Consent Decree, Brunner shall submit to the Department, for review and approval, a plan with a schedule to sample ("Sampling Plan") all required NPDES permit application parameters to determine effluent quality at Outfall 001 without interference from the discharge from Outfall 007. Upon Department approval, Brunner shall implement the Sampling Plan in accordance with the schedule in the approved Sampling Plan. Brunner shall submit the sampling results to the Department within 60 days of receipt of the results. The Department will use its best efforts to perform a Water Quality-based Effluent Limitation ("WQBEL") analysis within 30 days of receipt of the sampling results. Based upon the Department's WQBEL analysis, the Department will determine if effluent limitations are necessary at Outfall 001. If limitations are necessary, Brunner shall submit a proposal to the Department, for review and approval, to permanently move the Outfall 001 monitoring point to avoid interference from the discharge at Outfall 007 (and Outfall 008 once that outfall comes on line).	Submit to DEP sampling plan to address interference of Outfalls 007 & 008 discharges with permit renewal sampling for Outfall 001 by 1/7/2020.	Outfall 001 Sampling Plan submitted to the DEP on 12/6/2019. The DEP reviewed the sampling plan; DEP comments received 12/23/2019 which requested a modification to the sampling date. The revised plan was submitted to DEP on 1/7/20. Final approval of the Outfall 001 Sampling Plan was received from the DEP on 1/14/20. Outfall 001 sampling was conducted on 4/22/2020 according to the sampling plan.	N/A	The DEP requested that Outfall 001 sampling occur while the cooling tower was in operation. Due to limited market demand, Brunner Island operations did not occur until the week of 4/20/2020, during which time the cooling tower was put into operation and sampling of Outfall 001 was conducted according to the approved sampling plan.
				With regard to the thermal discharge from Outfall 001, any time Brunner notifies the Department of a temperature change during a unit shut down in which the heat source is removed from the discharge channel and which results in a 6-degree Fahrenheit change of temperature during a one-hour period, Brunner shall notify Citizens by email at approximately the same time it notifies the Department as required by Part C, Section VI of Brunner's NPDES Permit... Within 3 hours and again within 24 hours of recording of a 6-degree Fahrenheit or greater one-hour temperature change, Brunner shall commence a visual inspection from the water's edge, starting at the water	Any time Brunner notifies DEP of a temperature change during a unit shutdown (removal of heat source) and which results in a 6-degree Fahrenheit temperature change in a one-hour period, Brunner shall notify Citizens by email at approximately the same time it notifies the DEP.	<u>Event 1:</u> On 11/26/19 between 3:31 am and 3:58 am the discharge channel exceeded -6 deg F change of temperature in a one hour period. The DEP was notified at 4:45 am. No distressed or dead fish were observed by plant personnel during a visual inspection conducted within 3 hours of the event. No distressed or dead fish were observed by an independent contractor during an inspection conducted the same day between 9:50 and 10:35 am. A report was submitted to the DEP on 12/6/19.	N/A	None

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14	IX	42	Cooling Water Discharge Channel Operations & Reporting	intake, upstream of the discharge channel, and ending at the 5000-foot compliance point to assess the impact of the temperature change on fish. The first inspection need not be performed by trained personnel and shall be performed to get an initial location and approximate number of obviously distressed and/or dead fish. Within 10 business days thereafter, Brunner shall submit a report to the Department setting forth: the reasons for the temperature excursion; steps that will be taken to prevent a reoccurrence; and, the results of the visual inspections including the location of, and approximate number of, visibly distressed and/or dead fish.	Within 3 hours of the 6-degree Fahrenheit or greater one-hour temperature change, and again within 24 hours, conduct a visual inspection from the water's edge, starting at the water intake and ending at the 5000-foot compliance point to assess the impact of the temperature change on fish.	<u>Event 2:</u> On 1/17/20 between 10:58 pm and 11:43 pm, the discharge channel exceeded -6 deg F change of temperature in a one hour period. The DEP was notified on 1/18/20 at 1:00 am. No distressed or dead fish were observed by plant personnel during a visual inspection conducted within 3 hours of the event. No distressed or dead fish were observed by an independent contractor during an inspection conducted on 1/18/20 from 14:30 to 16:48. A report was submitted to the DEP on 1/28/20.	N/A	None
					Within 10 business days thereafter, submit a report to the DEP stating the reasons for the temperature excursion, steps that will be taken to prevent a reoccurrence, and results of the visual inspections.		N/A	None
15	IX	44	316(a) Variance	Brunner has submitted a Section 316(a) Demonstration Work Plan to the Department in accordance with Part C, Section II. F. of its NPDES permit. The Department and Citizens commented on that Work Plan. The Work Plan has been approved by the Department and is incorporated into this Consent Decree as Exhibit G. Brunner shall implement the Work Plan and submit the results and any additional evaluation(s) to support its Section 316(a) variance with the next application for renewal of its NPDES permit currently due on January 31, 2023. The Department will make a determination regarding the variance as part of the NPDES permit renewal. Brunner agrees to provide the Department with interim reports, on a frequency to be agreed to by all Parties within 90 days after the entry of the Consent Decree, that includes the data gathered and analyzed pursuant to the Work Plan. If the Department has granted a 316(a) variance, Brunner will submit the information necessary to support the continuation of its Section 316(a) variance in future NPDES renewal applications, in accordance with the law and regulations then in existence.	Obtain agreement from all parties on frequency of interim reports that include the data gathered and analyzed pursuant to the Work Plan.	Reached agreement with DEP and Citizens to submit semi-annual Interim Reports on 1/28 and 7/28 starting on 7/28/20	N/A	None
16	X	45	CD Reporting & Meetings	Within 180 days of entry of this Consent Decree and annually thereafter, Brunner shall submit written status reports to the Department and Citizens. A status report shall be submitted in addition to any other reporting, plan, schedule, or certification required under this Consent Decree or pursuant to law, regulation, or permit. The status report shall state and describe the cause of any failure to comply with this Consent Decree and at a minimum shall include: (a) The deadlines and other milestones that Brunner was required to meet during the reporting period; (b) The progress it made toward meeting the deadlines and other milestones that Brunner was required to meet during the reporting period; (c) The identification of, and reasons for, any noncompliance with any condition or obligation established by this Consent Decree; and, (d) A description of any other matters relevant to the status of its compliance with this Consent Decree.	Submit an annual written status report to DEP and Citizens by May 6, 2020, and annually thereafter.	Completion of this requirement is met with the submittal of this status summary document.	N/A	None



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Item #	Consent Decree Section	Consent Decree Paragraph	Subject	Description of Requirement	Deadline / Milestone	Description of Progress	Identification of / Reasons for Noncompliance	Additional Comments
17	X	47	CD Reporting & Meetings	Brunner shall promptly provide Citizens with all deliverables required under this Consent Decree, as well as quarterly groundwater monitoring data from Ash Basins 5 and 6 and Disposal Area 8. Brunner shall submit (in electronic format where possible) other documentation related to the compliance with and enforcement of this Consent Decree, including copies of discharge monitoring reports and attachments thereto, upon request by Citizens, unless previously submitted by Brunner to Citizens.	Provide Citizens with all deliverables required under Consent Decree, as well as quarterly groundwater monitoring data from Ash Basins 5 and 6 and Disposal Area 8.	The 4th Quarter 2019 Ground Water Monitoring Data for Ash Basins 5 and 6 and Disposal Area 8 was sent to the DEP on 1/2/20 and was sent to Citizens on 1/9/20. The 1st Quarter 2020 Ground Water Monitoring Data for Ash Basins 5 and 6 and Disposal Area 8 was sent to the DEP on 3/23/20 and was sent to Citizens on 3/30/20.	N/A	None
18	X	48	CD Reporting & Meetings	Brunner, the Citizens, and the Department will meet annually, beginning on June 1, 2020, to discuss compliance with this Consent Decree, including, but not limited to, a discussion of data submitted by Brunner pursuant to this Consent Decree.	Brunner, the Citizens and the Department will hold the first annual meeting on June 1, 2020.	First annual meeting has been scheduled for June 1, 2020 using virtual meeting platform.	N/A	None
19	XI	49	Additional Information Available to Public	All data submitted by Brunner for posting on the Department's website shall be submitted to the Department electronically in PDF format as well as in hard copy format, with PDF copies to the Citizens.	Submit all data to DEP electronically in PDF format as well as in hard copy format, with PDF copies to the Citizens.	All documents submitted to the DEP have been completed electronically in PDF format, as well as in hard copy format. All submittals have been sent to the Citizens electronically in PDF format.	N/A	None
20	XIII	51 (a)	Civil Penalties	Brunner shall pay a total civil penalty to the Department in the amount of \$1,000,000.00. Brunner shall pay as follows: (a) 30 days after entry of this Consent Decree: (i) \$330,533.32 payable to the "Commonwealth of Pennsylvania," with the memo line directed to the "Solid Waste Abatement Fund" and mailed to Mr. Anthony Rathfon, Waste Program, 909 Elmerton Avenue, Harrisburg, PA 17110. (ii) \$8,400.00 payable to the "Commonwealth of Pennsylvania," with the memo line directed to the "Clean Water Fund" and mailed to Ms. Maria Bebenek, Clean Water Program, 909 Elmerton Avenue, Harrisburg, PA 17110.	By 12/8/2019, submit check in the amount of \$330,533.32 payable to the Commonwealth of Pennsylvania, with the memo line directed to the Solid Waste Abatement Fund, and mail to the PA DEP Waste Program, care of Mr. Anthony Rathfon.	The stipulated payment was completed on 12/4/2020 in accordance with the described instructions.	N/A	None
					By 12/8/2019, submit check in the amount of \$8,400.00 payable to the Commonwealth of Pennsylvania, with the memo line directed to the Clean Water Fund, and mail to the PA DEP Waste Program, care of Ms. Maria Bebenek.	The stipulated payment was completed on 12/4/2020 in accordance with the described instructions.	N/A	None
21	XIII	51 (b)	Civil Penalties	(b) 150 days after entry of this Consent Decree: \$330,533.34 payable to the "Commonwealth of Pennsylvania," with the memo line directed to the "Solid Waste Abatement Fund" and mailed to Mr. Anthony Rathfon, Waste Program, 909 Elmerton Avenue, Harrisburg, PA 17110.	By 4/6/2020, submit check in the amount of \$330,533.34 payable to the Commonwealth of Pennsylvania, with the memo line directed to the Solid Waste Abatement Fund, and mail to the PA DEP Waste Program, care of Mr. Anthony Rathfon.	The stipulated payment was completed on 4/2/2020 in accordance with the described instructions.	N/A	None
22	XIII	52	Civil Penalties	In full satisfaction and settlement of the Citizens' claims for civil penalties for alleged violations of Applicable Environmental Laws, RCRA, the CCR Rule, and permits issued thereunder, through the date of entry of this Consent Decree, including, without limitation, claims or violations which were or could have been set forth in Citizens' Complaint, Brunner shall, within thirty (30) days of entry of this Consent Decree, pay \$100,000 toward one or more qualifying Supplemental Environmental Projects ("SEPs") implemented by the Watershed Alliance of York ("WAY") to reduce or mitigate the effects of water pollution in the Lower Susquehanna River Watershed.	By 12/8/2019, submit check in the amount of \$100,000 payable to the Watershed Alliance of York (WAY).	The stipulated payment was completed on 12/4/2019 in accordance with the described instructions.	N/A	None