

Shawville Generating Station PO Box F 250 Power Plant Dr. Shawville, PA 16873 724-768-4225

Via Email

October 29, 2019

Mr. Justin Dickey, P.E.
Environmental Engineer Manager
Pennsylvania Department of Environmental Protection
Northwest Regional Office
Clean Water Program
230 Chestnut Street
Meadville, PA 16335

Warren Generating Station NPDES Permit No. PA0005053 Conewango Township, Warren County Addendum-Comments on Draft NPDES Permit

Dear Mr. Dickey:

On October 10, 2019, GenOn REMA, LLC provided comments on the draft NPDES Permit No. PA0005053 for Warren Generating Station that was published in the PA Bulletin on September 14, 2019. An extension to submit comments until October 29, 2019 was granted by the Department on October 11, 2019. This is an addendum to the October 10, 2019 comments.

Additional results for the Total Nickel and Chloride samples taken were received and have been added to the comment on Part A.I.A below:

<u>Part A.I.A</u> – Total Nickel and Chloride Monitoring – Quarterly Total Nickel and Chloride monitoring and reporting were added to develop a dataset to evaluate potential impacts to threatened or endangered mussel species in the Allegheny River based on USFWS criteria. Four additional samples were taken of these parameters with the following results:

Total Nickel – 23 μg/l, 29 μg/l, 24 μg/l and 28 μg/l Chloride – 10.7 mg/l, 17.7 mg/l, 9 mg/l and 13.2 mg/l

GenOn requests that the Chloride monitoring be removed from the permit as the results are below the USFWS criteria. Based on the lower results for Total Nickel and the Department's statement in the Fact Sheet that Nickel is not expected to be measurable at levels in the Allegheny River at the point of discharge that would exceed the USFWS criteria due to the instantaneous assimilative capacity of the Allegheny River, GenOn requests that the Nickel monitoring also be removed from the permit.

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If there are any questions, please contact Karen McClelland at 724-877-4462.

Sincerely,

David Bailey O&M Manager

cc: Stephen Frank (email) Karen McClelland (email) John Telford-Shawville (email)