

Via Overnight Mail and Email

October 10, 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 Comments on Draft NPDES Permit

Dear Mr. Dickey:

GenOn REMA, LLC appreciates the opportunity to provide comments on draft NPDES Permit No. PA0005053 for Warren Generating Station that was published in the PA Bulletin on September 14, 2019.

Site Contact Information:

- 1. Site contact John Telford, 814-768-4283, john.telford@genon.com.
- 2. Plant Manager William J. Weaver, 814-768-4225, william.weaver@genon.com.
- Mailing Address (Same): PO Box F

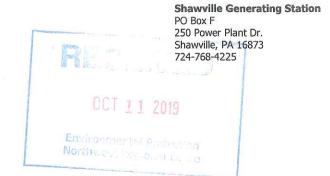
250 Power Plant Drive Shawville, PA 16873

<u>Permittee Name</u> – Permittee name should have a comma between REMA and LLC. It should be GenOn REMA, LLC.

<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. Two additional samples were taken of these parameters with the following results:

Total Nickel – 23 μ g/l and 29 μ g/l Chloride – 10.7 mg/l and 17.7 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



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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.

<u>Subdivision Plan</u> – As discussed in our call with you on September 25, 2019, GenOn plans to subdivide the Warren Station property to separate the Combustion Turbine (CT) site from the former coal-fired generating station site. A subdivision map is attached. The area within the cross-hatched black lines will fall under a permit to be issued to Warren Power, LLC. GenOn requests that the subdivided parcel be excluded from the NPDES permit and that this permit be held until permitting for the new parcel is in place.

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

Sincerely,

William J/Weaver Plant Manager

Attachments

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

