

May 28, 2025

Justin Dickey, PE Environmental Program Manger Pennsylvania Department of the Environment 230 Chestnut Street Meadville, PA 16335

Subject: WQM Permit 3215200-A1 Notice of Equipment Relocation

Outfall 001 Water Filter System

Dear Mr. Dickey,

Homer City Generation, LP (HC) is submitting this letter to notify the Clean Water Program of plans to relocate the existing 001 water treatment plant polishing filter system from the existing Filter Water Building to a new location near the 001 WTP Wet Well (see Figure 1). This work is necessary to accommodate the ongoing demolition work around the power block at the former Homer City Generation Station.

HC is currently making provisions to ensure that auxiliary equipment, temporary systems, electrical power, communications, and monitoring equipment are in place during relocation activities to maintain compliance with the NPDES permit (PA0005037) at Outfall 001.

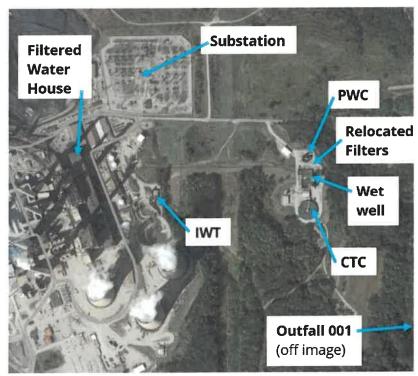


Figure 1: Homer City Water System, Major Components

Pertinent information regarding the existing 001 Water Treatment Plant (WTP) and the polishing filter equipment relocation are summarized below:

1. **WQM Permit:** 3215200-A1

Existing 001 WTP Description: See Process Flow Diagram drawing G-01

The 001 Wastewater Treatment Plant (WTP) receives and treats wastewater from the following legacy HC facilities:

- Treated Ash Disposal Site leachate/stormwater from the Ash Valley Treatment System (AVTS)
- Treated Coal Refuse Disposal Area leachate/stormwater from the WasteWater Recycle (WWR)
 Reaction Cell
- Treated industrial storm and wastewater from the Industrial Wastewater Treatment (IWT) plant.
- Contact stormwater from the Greenhouse Pond (GHP)

Treated wastewater is directed to the Cooling Tower Clarifier (CTC) or the Potable Water Clarifier (PWC) for clarification and then passed from the Wet Well to the fuzzy filter system for polish prior to discharge to Outfall 001. The WTP operates at an average flow of 1,000 gpm and peak flow of 1,300 gpm.

The existing filter system consists of:

- Two fuzzy filters with 1,300 gpm (1.87 MGD) design capacity each;
- One 2,000 gpm capacity end suction pump, VFD, and a shelf spare;
- Two 1,500 gpm vertical turbine pumps and VFDs; and
- Clear well basin for filtered water.

Backwash from the filter system flows to the IWT plant for treatment before flowing to the CTC.

Equipment Relocation: See Process Flow Diagram drawing G-01

The polishing filter system will be relocated from the Filter Water Building to the new location near the Wet Well (Attached drawing FFR-001). Adjustments to protect the equipment and maintain the water hydraulics (i.e. pressure and flow rate) of the overall 001 WTP system are as follows:

- Filters will be moved to an enclosed heated space with a local control panel to maintain current operations.
- End suction pumps will be relocated to the front of the filter system.
- Filtered water will be discharged by gravity to Outfall 001. Therefore, the vertical turbine pumps and a clear well basin will not be required at the new location.
- Metering and sampling will be relocated to the filter system discharge.
- Filter backwash will flow into a tank and then be pumped directly to the CTC.

The proposed work is not anticipated to disturb more than 2,000 square feet of earth. Most of this will be for preparing the proposed equipment slab. See attached drawing FFR-002 for the location of the relocated polishing filter and supporting facilities.

4. Sequencing

The sequence for the filter system relocation will be made to eliminate any polishing filter downtime. The proposed pad, electrical equipment, control panels, wiring, piping, and auxiliary equipment will be installed at the new location prior to disconnecting the first existing filter.

The connection piping to the existing Wet Well will be accomplished through connecting to existing piping on the Wet Well exterior. This will allow for the tie in to occur without having to shut down the existing Wet Well or interrupt water system operation.

A temporary rental filter system will be installed, tested, and put into service to treat water from the Wet Well before the first filter is disconnected. If necessary, measures will be taken to prevent the filter system from freezing, such as heat tracing, insulating, or other similar measures. A layout of the temporary filter system is presented in figure FFR-002.

Relocation activities are anticipated to be completed in 90 days. Once the existing filters are put back into service, the temporary sand filters will be decommissioned and removed.

5. Project Schedule

The proposed relocation of the filter system is being planned for the summer of 2025. Completion of this work is not anticipated to take place in cold weather and the proposed cold weather shelter for the filter system is scheduled to be completed prior to the fall of 2025.

Major milestone schedule items are provided below:

Description	Anticipated Start Date	Anticipated End Date
Proposed pad prep and foundation	June 2025	July 2025
Set proposed filter support equipment	June 2025	July 2025
Install start of temporary equipment	July 2025	September 2025
Relocate Existing equipment	August 2025	October 2025
Startup of relocated equipment	September 2025	October 2025

We look forward to continuing working with the PADEP on the Homer City Redevelopment project.

Sincerely,

Michael Levesque V Chief Operating Officer

Enclosed: Existing and relocated system flow diagram

FFR-001 – Relocation Map

FFR-002 - Relocation and Temporary Layout