TEMPORARY ASH DISPOSAL SITE CLOSURE PLAN HOMER CITY GENERATING STATION CENTER TOWNSHIP INDIANA COUNTY, PENNSYLVANIA

Prepared For:

Homer City Redevelopment LLC 1750 Power Plant Road Homer City, PA 15748

Prepared By:



Civil & Environmental Consultants, Inc.

700 Cherrington Parkway Moon Township, PA 15108

CEC Project 342-766.0001

June 2024 Revised July 2024



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1.0 INTRODUCTION

On behalf of Homer City Redevelopment LLC, Civil & Environmental Consultants, Inc. (CEC) has prepared this Closure Plan for the temporary Ash Disposal Site (Disposal Site) located at the Homer City Generating Station in Indiana County, PA. The Disposal Site will be closed by removal and the ash will be placed in the on-site Coal Refuse Disposal Area (CRDA) in accordance with existing operations approved by the Pennsylvania Department of Environmental Protection (PADEP) Bureau of Mining Programs.

This Closure Plan addresses the following:

- Background;
- Closure by removal;
- Closure sampling and analysis;
- Erosion and sediment (E&S) controls;
- Groundwater monitoring; and
- Schedule

2.0 BACKGROUND

The Disposal Site is located to the east of the Station and to the south of the CRDA. The Disposal Site was used in 1980 for emergency ash disposal during a labor strike. The Disposal Site is approximately 12 acres and contains approximately 300,000 tons of fly ash and bottom ash. The design of the Disposal Site included Sedimentation Pond No. 1 (Pond 1) on the north and Sedimentation Pond No. 2 (Pond 2) on the south for managing stormwater runoff. Figure 1 provides the Site Location Map and Figure 2 provides the Site Aerial Map and are included in Appendix A.

A Closure Plan for the Disposal Site was approved by the PADEP in a letter dated April 30, 1981 and was included in the Consent Order Agreement (COA) dated August 9, 1982. The Disposal Site was closed with a soil cover. Closure of the site was completed about November 1981. The Disposal Site completed post-closure monitoring on June 9, 2011.

As part of the site redevelopment, the Disposal Site is planned to be excavated. Erosion and sediment (E&S) controls will be installed prior to excavation. The ash will be hauled to the CRDA and mixed with the coarse coal refuse being disposed by Rosebud Mining in accordance with Coal Refuse Disposal Facility Permit No. 32753702 issued on October 17, 1989. Stormwater discharges from the CRDA are permitted under NPDES Permit No. PA0235849. The ash placement will be performed in accordance with the terms and conditions of the permit.

3.0 CLOSURE BY REMOVAL

During waste removal, the following procedures will be followed:

- Existing E&S controls, including perimeter channels and the sedimentation ponds will be utilized.
- The limits of the Disposal Site will be established by excavating test pits.
- Compost filter sock or other erosion controls will be installed around the Disposal Site.
- Existing haul roads will be used to haul the material from the Disposal Site to the CRDA.
 The locations of the haul roads are shown on Figure 2. Additional roads may be constructed
 as needed. Dust controls such as watering will be implemented on the haul roads in
 accordance with the existing Title V permit requirements.
- Waste removal will occur in lifts from the top down. In the area of waste removal, the cover soil will be removed and used to construct a berm around the area to be excavated or will be stockpiled.
- A berm will be maintained around the perimeter of the excavation area to maintain contact water within the footprint of the excavation.
- Downslope areas will remain vegetated to limit impacts from stormwater runoff.
- If soil is stockpiled, compost filter sock or other erosion controls will be installed around the stockpile.
- The waste will be excavated and loaded into haul trucks.
- The waste will be hauled to the CRDA and placed with coarse coal refuse in accordance with existing permit requirements.
- All visible ash and visibly contaminated soils will be removed. Following excavation, confirmatory soil sampling of the in-situ soils will be performed to determine compliance with the Medium Specific Concentrations (MSCs) established in 25 Pa. Code Chapter 250, Administration of the Land Recycling Program (Act 2) as discussed in Section 4.0. If the in-situ soils exceed the Act 2 MSCs, additional soil will be excavated and resampled until the criteria are met. The excavated soils will also be placed in the CRDA.



4.0 CLOSURE SAMPLING AND ANALYSIS

As stated above, all visible ash and visibly contaminated soils will be removed. Following removal of the ash and visibly contaminated soils, a hand-held X-Ray Fluorescence (XRF) unit, which allows for rapid field analyses of metals concentrations in soil, will be used to screen the soils remaining in place. The XRF screening will be used to guide the excavation and attempt to remove soils impacted by the historical ash disposal prior to collection of confirmatory samples for laboratory analyses.

At the completion of excavation, confirmatory samples will then be collected of the in-situ soils and submitted to a Pennsylvania-accredited laboratory for analyses of the parameters presented below. Soil samples will be collected in general accordance with the Pennsylvania Act 2 guidance, which bases the number of attainment samples required based on the volume of contaminated soil that is removed.

- For volumes of soil equal to or less than 125 cubic yards, at least 8 samples are required.
- For volumes up to 3,000 cubic yards, at least 12 samples are required.
- For each additional soil volume up to 3,000 cubic yards, an additional 12 samples are required.

Samples will be taken at random using a systematic random sampling protocol, such as that provided in PADEP's Spreadsheet of Systematic Random Sampling. It is estimated that approximately 0.5-foot of soil will be removed over the 12-acre area (approximately 10,000 cubic yards), which would require approximately 48 samples. Upon collection, samples will be placed in an iced cooler and submitted to a Pennsylvania-accredited laboratory for analyses of the following parameters using industry-accepted chain-of-custody procedures:

Arsenic	Copper	Selenium
Barium	Lead	Silver
Cadmium	Mercury	Zinc
Chromium	Nickel	

These constituents were selected based on past analyses that have shown that these are the typical constituents of concern present in fly ash and bottom ash generated at the Homer City Generating Station, and this list is consistent with previous closure plans including the 1999 Homer City Westside Drainage Pond Closure Plan and 2011 Homer City Generation Station Ash Pond Closure Plan.

Upon receipt of the laboratory analytical data, confirmatory soil samples will be tabulated and compared to the Act 2 Nonresidential, Used Aquifer (TDS \leq 2,500 mg/L) direct-contact and soil-to-groundwater MSCs. In accordance with 25 PA Code §250.707(b)(1)(i), if more than 75% of the confirmatory samples are less than the MSC and no sample exceeds ten times the MSC; attainment will be demonstrated. If attainment is not demonstrated, additional soil excavation and confirmatory soil sample collection will be performed until attainment of the Act 2 MSCs are demonstrated.

5.0 EROSION AND SEDIMENT CONTROLS

Preservation of existing vegetation will serve as the primary E&S control during excavation. Prior to waste removal, the existing E&S controls will be re-established, including perimeter channels and the sedimentation ponds and will be utilized. Additional E&S controls will be used during the project to control sediment discharges from the site as described in the following sections. Figure 3 provides the E&S Control Plan and Figure 4 contains the details, which are included in Appendix A. Refer to Table 1 for an inspection and maintenance plan for the proposed E&S controls and Appendix B for the E&S Controls Inspection Form.

5.1 Rock Construction Entrance

A rock construction entrance will be constructed at the location where trucks will exit the Disposal Site to remove sediment from the truck tires. The rock construction entrance will be constructed to the dimensions shown on PA E&S Standard Construction Detail #3-1 and will be installed in accordance with the PADEP Erosion and Sediment Pollution Control Program Manual (PADEP E&S Manual). A culvert pipe is only required if the rock construction entrance crosses a roadside ditch to provide a means of conveying the flow past the entrance.

The rock construction entrance will be maintained to remove sediment from the tires by adding rock when necessary. Sediment deposited on the paved haul roads will be removed. Washing the roadways or sweeping the deposits into roadway ditches, sewers, culverts, or other drainage courses is not acceptable.

5.2 Compost Filter Sock

A 12-inch compost filter sock will be installed around the perimeter of the Disposal Site upslope of the perimeter channel prior to earth disturbance. Compost filter sock will also be installed around soil stockpiles if needed. The compost filter sock will meet the specifications and be installed in accordance with PA E&S Standard Construction Detail #4-1 and the PADEP Erosion and Sediment Pollution Control Program Manual (PADEP E&S Manual).

Filter socks will be placed parallel to the contour with at least 8-feet of both ends of the sock extended upslope at a 45 degree angle to the rest of the sock. Socks placed on earthen slopes will be anchored with stakes driven through the center of the sock or immediately downslope of the sock at intervals specified by the manufacturer. Traffic will not cross the filter socks. Accumulated sediment will be removed when it reaches half of the aboveground height of the sock and will be graded within the upgradient area or placed in the CRDA.

5.3 Vegetative Stabilization

After earth disturbance activities are completed, the disturbed areas will be vegetated with permanent vegetation or backfilled with aggregate in preparation for future site development. Areas will be revegetated in accordance with the recommendations in the PADEP E&S Manual. If final grade is achieved during non-germinating months, the area will be mulched until the beginning of the next planting season. Areas that are revegetated will be considered stabilized when there exists a minimum uniform 70% perennial vegetative cover, with a density capable of resisting accelerated erosion and sedimentation.

5.4 Erosion Control Blanket

Erosion control blankets will be used on slopes if needed. The erosion control blankets will be installed in accordance with PA E&S Standard Construction Detail #11-1 and the PADEP E&S Manual and will be installed in accordance with manufacturer's recommendations. If a rolled blanket is used, the area will be smooth and uniform and the blanket will be installed with continuous contact between the blanket and underlying soil. The slope surface will be free of rocks, clods, sticks, and grass. The blankets will be stapled in accordance with manufacturer's recommendations. The seed and soil amendments will be applied in accordance with the revegetation requirements. Blanketed areas will be inspected weekly and after each runoff event until perennial vegetation is established to a minimum uniform 70% coverage throughout the blanketed area. Damaged or displaced blankets will be restored or replaced within 4 calendar days.

Hydraulically applied blankets may also be used, but not in areas of concentrated flow. There is no need to smooth the surface prior to the application of hydraulically applied blankets. Some roughening of the surface is preferable. Rocks greater or equal to 9-inches in any dimension and existing rills will be removed prior to application. Typically, the seed mix and soil amendments are applied first. After the seed mixture is applied, the fiber matrices should be applied in accordance with manufacturer's recommendations.

6.0 GROUNDWATER MONITORING

Groundwater quality at the site was previously monitored in accordance with the site Closure Plan.

6.1 Groundwater Monitoring

Groundwater monitoring wells and monitoring points were previously used to monitor the groundwater quality at the Disposal Site. The groundwater monitoring network consists of one upgradient monitoring well (TADSMP-14) and three downgradient monitoring points (TADSMP-15, TADSMP-16, and TADSMP-17). TADSMP-17 is a spring. Installation of the monitoring wells was completed April 26, 1985. The locations of the monitoring points are shown on Figure 2.

Prior to initiation of closure activities, a minimum of two samples will be collected from each monitoring point to establish a baseline for each of the parameters identified in Section 4.0 minus nickel (arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, silver and zinc), as sampling for nickel has never been required at the Site. Samples will be collected a minimum two weeks apart. Upon collection, samples will be filtered in the field using a 0.45-micron sample filter and placed into pre-preserved laboratory sample containers for dissolved metals analyses. The monitoring wells (TADSMP-14, TADSMP-15, and TADSMP-16) will be re-developed prior to the first sampling event. TADSMP-17 will need to be evaluated in the field to confirm accessibility and the presence of flow prior to use as a monitoring point. After closure by removal, water quality monitoring will continue at the locations identified above for 2 years (8 quarters) to evaluate trends in the same parameters identified above (field-filtered/dissolved arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, silver and zinc) to determine if closure activities have impacted groundwater. Sample results will be provided to the PADEP each quarter using the PADEP's Form 14R

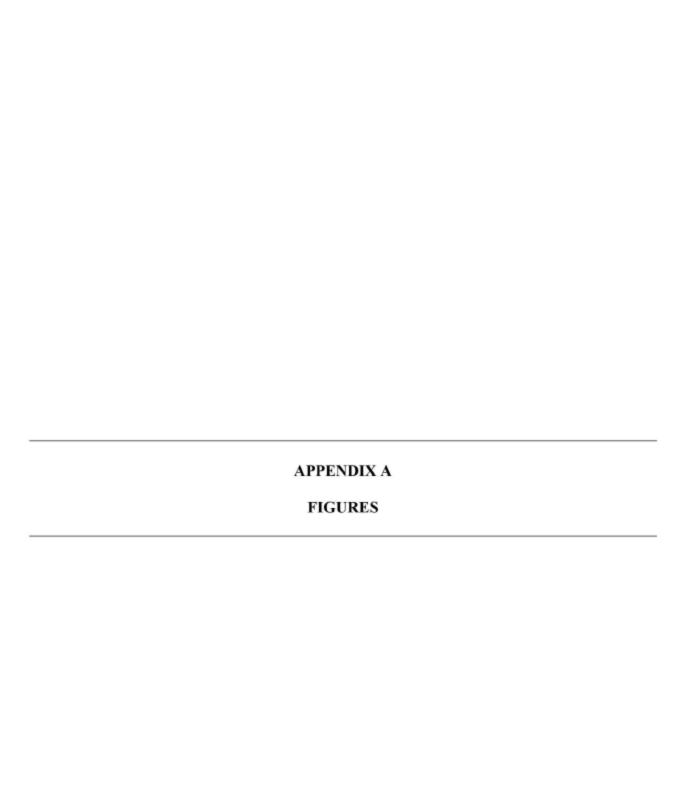
At the completion of the 8 quarters of sampling, the complete dataset will be evaluated for the potential presence of groundwater impacts attributable to the closure by removal activities and for attainment of an applicable remediation standard as discussed below. If the data show stable and/or decreasing trends in monitored constituents and demonstrate attainment of an applicable remediation standard, monitoring will cease, a closure report will be prepared to document the

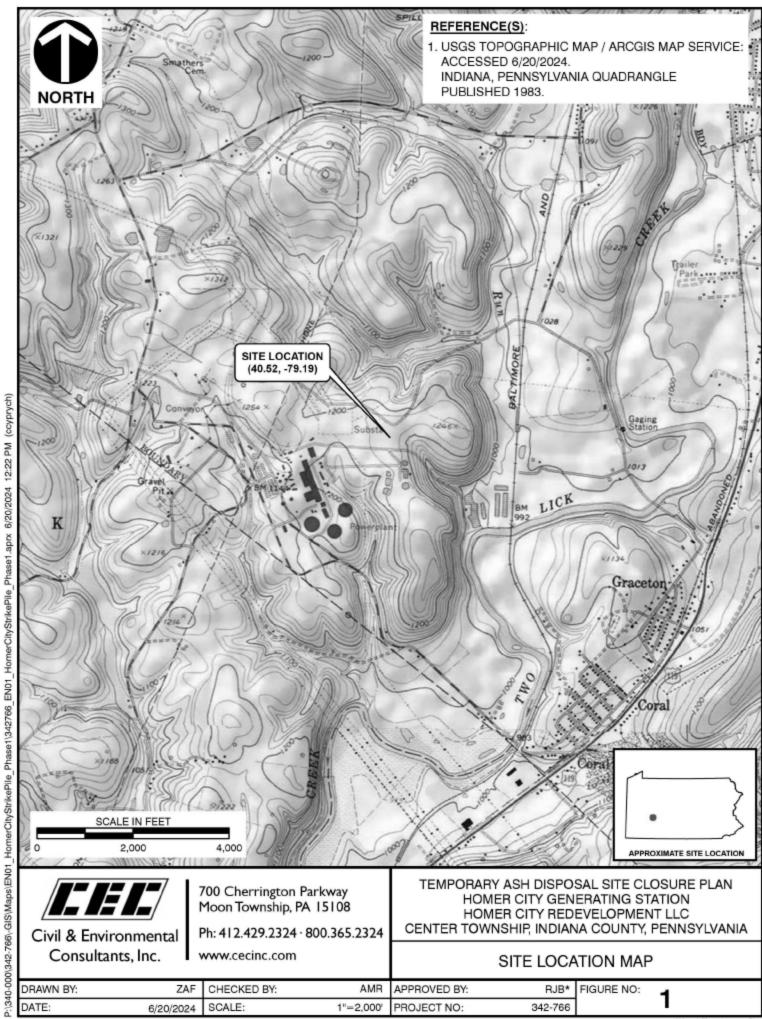
closure and sampling activities, including completion of a Form 19R – Certification of Facility Construction Activity, and a request for final closure certification will be made. If increasing trends are identified that are indicative of impacts from closure activities and it cannot be demonstrated that an applicable remediation standard has been attained, a plan to address the groundwater impacts will be developed and submitted to PADEP for review and approval. For the purposes of demonstrating attainment of an applicable standard, a demonstration will be made that one of the following remediation standards is met and maintained at the identified compliance points in accordance with 25 Pa Code § 287.342:

- The Statewide health standard at and beyond the property boundary.
- The background standard at each well selected to determine the extent of contamination, as identified in § 288.256(c)(1) or § 289.266(c)(1) (relating to groundwater assessment plan), or
- The site-specific standard at and beyond the property boundary.

7.0 SCHEDULE

Closure activities will be started as soon as possible after the Closure Plan is approved by the PADEP. It is anticipated that closure by removal will take approximately 3 to 4 months. After completion, a report will be submitted to the PADEP Bureau of Waste Management documenting closure activities and will include the results of soil and groundwater sampling and testing.







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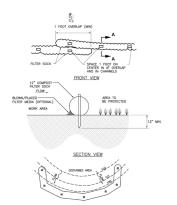
MOUNTABLE BERM (6 IN. MIN.)* EXISTING ROADWAY PROFILE PLAN VIEW MOUNTABLE BERM USED TO PROVIDE PROPER COVER NOTES:

REMOVE TOPSOIL PRIOR TO INSTALLATION OF ROCK CONSTRUCTION ENTRANCE, EXTEND ROCK OVER FULL WIDTH OF ENTRANCE.

- 2. RUNOFF SHALL BE DIVERTED FROM ROADWAY TO A SUITABLE SEDIMENT REMOVAL BMP PRIOR TO ENTERING ROCK CONSTRUCTION ENTRANCE.
- MOUNTABLE BERM SHALL BE INSTALLED WHEREVER OPTIONAL CULVERT PIPE IS USED AND PROPER PIPE COVER AS SPECIFED BY MANUFACTURER IS NOT OTHERWISE PROVIDED. PIPE SHALL BE SIZED APPROPRIATELY FOR SIZE OF DITCH BBING CROSSED.
- MANTHUNES. BOOK CONSTRUCTION PRIVACE PROVINCE PROSECT.

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ROCK CONSTRUCTION ENTRANCE

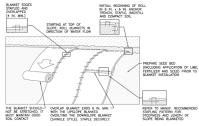


- 12" COMPOST FILTER SOCK SHALL MEET THE EROSION CONTROL STANDARDS OF THE PADEP EROSION CONTROL MANUAL.
- COMPOST FILTER SOCK SHALL BE PLACED AT EXISTING LEVEL GRADE.
 TRAFFIC SHALL NOT BE PERMITTED TO CROSS COMPOST FILER SOCKS.
- - ACCUMULATED SEDIMENT SHALL BE REMOVED AND DISPOSED OF WHEN IT REACHES IS THE ABOVE GROUND HEIGHT OF THE COMPOST FILTER SOCK.

PLAN VIEW

COMPOST FILTER SOCK SHALL BE INSPECTED WEDKLY AND AFTER EACH RINOFF EVENT, DAMAGED COMPOST FILTER SOCK SHALL BE REPAIRED ACCORDING TO MANUFACTURER'S SPECIFICATIONS OR REPLACED WITHIN 24 HOURS OF INSPECTION.

FILTER SOCK EROSION CONTROL (TYP.)
(PADEP STANDARD DETAIL #4-1)



REVISION RECORD

SUBMITTAL RECORD

SEED AND SOIL AMENDMENTS SHALL BE APPLIED ACCORDING TO THE RATES IN THE PLAN DRAWINGS PRIOR TO INSTALLING THE BLANKET.

- PROVIDE ANCHOR TRENCH AT TOE OF SLOPE IN SIMILAR FASHION AS AT TOP OF SLOPE.
 SLOPE SURFACE SHALL BE FREE OF ROCKS, CLODS, STICKS, AND GRASS.
- BLANKET SHALL HAVE GOOD CONTINUOUS CONTACT WITH UNDERSYING SOIL THROUGHOUT ENTIRE LENGTH.
 LAY BLANKET LOOSELY AND STAKE OR STAPLE TO MANTAIN DIRECT CONTACT WITH SOIL. DO NOT STRETCH
 BLANKET.
- THE BLANKET SHALL BE STAPLED IN ACCORDANCE WITH THE MANUFACTURER'S RECO
- BLANKETED AREAS SHALL BE INSPECTED WEEKLY AND AFTER EACH RUNOFF EVENT UNTIL PERENNIAL VEGETATION IS ESTABLISHED TO A MINIMUM UNFFORM 70% COVERAGE THROUGHOUT THE BLANKETED AREA DAMAGED OR DISPLACED BLANKETS SHALL BE RESTORED ON REPLACED WITHIN 4 CALENDAR DAYS.

3 EROSION CONTROL BLANKET 4 (PADEP STANDARD DETAIL #11-1)



700 Cherrington Parkway Moon Township, PA 15108

DRAFT

TEMPOROARY ASH DISPOSAL SITE CLOSURE PLAN HOMER CITY GENERATING STATION HOMER CITY REDEVELOPMENT LLC

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TEMPORARY ASH DISPOSAL SITE CLOSURE PLAN HOMER CITY GENERATING STATION E&S CONTROLS INSPECTION FORM

Inspection Date/Time:				
Name of Person Performing Inspection:				
Weather Information:				
	Yes	No	N/A	Comments
Erosion and Sedimentation Controls:	_			
Any erosion and sedimentation control measure that needs maintenance or repairs?				
Any failed erosion and sedimentation control measure that needs replacement?				
Any additional control measures needed due to excessive erosion?				
Any sediment removal required?				
Access Roads:				
Is the rock construction entrance in satisfactory condition? Any sediment removal from surface required?				
Are the access roads in satisfactory condition?				
Is watering being performed as needed to prevent dusting?				
Drainage Structures:			_	
Are the following ietms in satisfactory conditions?	\vdash	_	_	4
Perimeter channels Sedimentation Ponds	\vdash	_		4
Pond Outlet Structures	\vdash			1
				'
Vegetation:				
Are there any areas of vegetation that need repaired?				
Remedial Actions/Repairs:				
Any remedial actions/repairs necessary?				
				1
Additional Comments:				
Area				Comments
(Signature) (Date)				

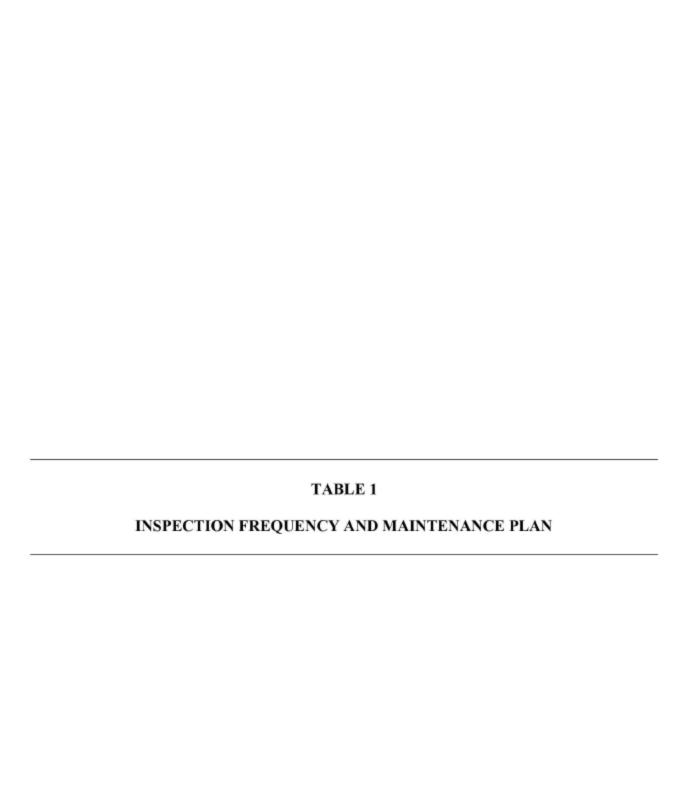


TABLE 1 INSPECTION FREQUENCY AND MAINTENANCE PLAN

	E&S CONTROLS				
Feature	Inspection Frequency	Maintenance			
Rock Construction Entrance	Daily and after all rain events greater than 0.25-inch within 24-hour period.	Remove any sediment at the surface of the entrance to prevent soil from tracking onto paved haul roads.			
Compost Filter Sock	Weekly inspection and after each storm event greater than 0.25-inch within 24 hour period.	Repair damaged socks in accordance with manufacturer's specifications or replace sock within 24 hours of inspection. Remove accumulated sediment when it reaches half the aboveground height of the sock.			
Vegetation	Weekly and after all rain events greater than 0.25-inch within 24 hour period until stabilized (when there is at least a uniform 70 percent vegetative cover established over the entire project area).	Seeding, fertilizing, and mulching as required.			
Erosion Control Blanket	Weekly inspection and after rain fall events greater than 0.25-inch within 24 hour period until stabilized (when there is at least a uniform 70 percent vegetative cover established over the entire project area).	Replace damaged blankets or restore displaced blankets within 4 calendar days.			

Notes:

- Inspection frequencies are in accordance with the PADEP Erosion and Sediment Pollution Control Program Manual dated March 2012.
- 2. Inspections will be performed until vegetation is established.

NOTICE PUBLIC NOTICE OF SUBMISSION OF CLOSURE PLAN TEMPORARY ASH DISPOSAL SITE HOMER CITY GENERATING STATION

Homer City Redevelopment LLC is providing notice that a Closure Plan is being submitted for a temporary Ash Disposal Site located at the Homer City Generating Station in Blacklick and Center Townships, Indiana County. The Closure Plan will be submitted to the Pennsylvania Department of Environmental Protection (PADEP) in July 2024. The Closure Plan includes removal of a temporary Ash Disposal Site with approximately 300,000 cubic yards of material, which will be placed in the Coal Refuse Disposal Area and mixed with coarse coal refuse in accordance with existing PADEP approval for beneficial use of coal ash.

This public notification is being provided in accordance with Chapter 287.151 of the Pennsylvania Residual Waste Regulations. Copies of the Closure Plan will be forwarded to the appropriate municipal authorities by the PADEP. In accordance with 287.151(a)(2), the host municipality and county may submit comments to the PADEP within 30 days of receipt of the Closure Plan, recommending conditions upon, revisions to and approval or disapproval of the Closure Plan, with the specific reasons described

n the comments.

A copy of the Closure Plan will also be available for review by the public at the PADEP Northwest Regional Office, 230 Chestnut Street, Meadville, PA 16335. Appointments to eview the Closure Plan may be made by calling (814) 332-6945. Fees for copying may be charged by the PADEP. The PADEP will accept and consider comments from the public during the permit review.

Persons who wish to comment on this Closure Plan should contact PADEP at the folowing address: PADEP Northwest Regional Office, Attention to Shawn Peters, Envi-

onmental Engineer Manager, 230 Chestnut Street, Meadville, PA 16335.

6/15, 6/22, 6/29



Proof of Publication

State of Pennsylvania County of Indiana

On this	320	day of	JULY	2024
			blic in and for said	County an
personal	lly appeared:	Sherri L	Bash	

who being duly sworn according to laws, deposes and says, that (s) Solicitor of the Indiana Gazette, that the said Indiana Gazette is newspaper of general circulation, published in the borough of Indian County of Indiana, State of Pennsylvania, by the Indiana Gazette was established in said Borough on the second day of July 189 which date, said daily newspaper has been regularly issued in said and County, that annexed hereto is a true copy of a notice in tr matter exactly as the same was printed in the regular editions and the said daily newspaper on the following dates, viz:

6/15, 6/22, 6/29

Affiant further deposes and says that (s)he is an employee of the of the said daily newspaper and has been authorized to verify the f statement and the (s)he is not interested in the subject matte aforesaid notice or publication and that all allegations in the f statement as to time, place, and character of publication are true.

By: Sherri L. Bash

Sworn to and subscribed before me the day and year aforesa

Commonwealth of Pennsylvania - Notary Seal DAWN A HAYES - Notary Public andiana County My Commission Expires August 31, 2025 Commission Number 1406600

Signature of notarial officer	
Proof of Publication	
Proof of Intent	\$
Total	

Indiana Gazette Inc., publishers of the Indiana Gazette, a daily newspaper, hearby acknowledges receipt of the aforesaid publication costs, and certifies the same has fully paid.

> Indiana Gazette Inc. P.O. Box 10, 899 Water Street, Indiana, PA 15701

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NOTICE

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Proof of Publication

State of Pennsylvania County of Indiana SS

On this	320	day of	JULY	2024 A.D.
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before me, the subscriber, a Notary Public in and for said County and State, personally appeared:

Sherri L. Bash

who being duly sworn according to laws, deposes and says, that (s)he is the Solicitor of the Indiana Gazette, that the said Indiana Gazette is a daily newspaper of general circulation, published in the borough of Indiana, in the County of Indiana, State of Pennsylvania, by the Indiana Gazette Inc., and was established in said Borough on the second day of July 1890, since which date, said daily newspaper has been regularly issued in said Borough and County, that annexed hereto is a true copy of a notice in the above matter exactly as the same was printed in the regular editions and issues of the said daily newspaper on the following dates, viz:

6/15, 6/22, 6/29

Affiant further deposes and says that (s)he is an employee of the publisher of the said daily newspaper and has been authorized to verify the foregoing statement and the (s)he is not interested in the subject matter of the aforesaid notice or publication and that all allegations in the foregoing statement as to time, place, and character of publication are true.

By: Sherri L. Bash

Sworn to and subscribed before me the day and year aforesaid.

Commonwealth of Pennsylvania - Notary Seal DAWN A HAYES - Notary Public Indiana County My Commission Expires August 31, 2025 Commission Number 1406600

Signature of notarial officer	
Page of Publication	\$846.00
Proof of Inlent	5 15.00
Total	\$861.00

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P.O. Box 10, 899 Water Street, Indiana, PA 15701

By			