Comments on Joppa

EPA:

None

State:

From:	"Mauer, Paul" <Paul.Mauer@Illinois.gov>
To:	James Kohler/DC/USEPA/US@EPA, Jose Cisneros/R5/USEPA/US@EPA, Nate Nemani/R5/USEPA/US@EPA, "jaso
Cc:	Stephen Hoffman/DC/USEPA/US@EPA
Date:	07/09/2010 03:12 PM
Subject:	RE: Comment Request on EPA Draft Assessment Report for Ameren Energy's Joppa Power Station

One revision to the document, then some more general comments.

At several points the writer indicates that the structure is not regulated. Initially the report indicates the structure comes under the state's dam safety regulations, but then concludes that the state is not inspecting the structure because it is not regulating the structure. This is incorrect. All dams in Illinois are under the regulation of the dam safety rules. Those rules have different levels of required activity. The original part of this structure was constructed 'pre-rules' and as a Class III structure only requires a permit if the owner makes a significant modification, but it is regulated under those rules. The addition to the structure is indicated as 'post-rules' and should have been permitted prior to construction. It appears to be a violation of our program rules. We were unaware of the date of construction prior to this time, and will advise the owner of the need to obtain a permit. The document should be corrected with regard to the regulated nature of the structure. I would be happy to discuss the program requirements with the writer if it will help.

I concur with the inspector's assessment of condition as Fair.

The observations made of the structures seem typical. The unusual comment regards the lack of a control mechanism on the internal culvert. Since any flow through the culvert remains controlled, it would be typical that the levels be allowed to self-balance to prevent avoidable overtopping of either cell. This seems to be the standard for multi-cell structures in Illinois. I was somewhat surprised that it merited a comment.

I have not seen your Scope of Work for the inspections. While the inspectors do have some professional responsibility to report dangerous conditions observed, even outside the scope of work, I have some concern about the general recommendations and opinions expressed in the inspection. The report should be a summary of the observations and documentation reviewed by the inspector. Design recommendations and professional preferences should not be provided by the inspector, especially an inspector under contract to a regulatory agency. The designs to resolve identified deficiencies are the responsibility of the owner and his consulting engineer(s). Since U.S. EPA has no adopted standards for these structures, the recommendations by the inspector cannot present solutions known to bring the structure into compliance. I would suggest that you don't want to be prevented from enforcing your future regulations because the owner followed the 'recommendations' in your inspection report. The inspection should present a list of identified deficiencies, if any, and conditions that do not meet industry standards. Once your rules are established, the 'Recommendations' section would be a 'required actions' section that you can enforce.

Thanks again for the opportunity to review the draft document.

Paul Mauer, Jr., P.E.
Senior Dam Safety Engineer

Company:

See attached letter from EEI dated August 4, 2010

Electric Energy, Inc.

August 4, 2010

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Hoffman:

Electric Energy, Inc. (EEI) appreciates the opportunity to provide comments on the Draft Dam Safety Assessment for the Joppa Plant. The Draft Report was prepared by O'Brien & Gere and was dated May 27, 2010.

Our comments on the report are as follows:

Page 3, Section 2.1, first paragraph

The megawatt ratings are incorrect in this paragraph. The EEI coal fired gross generating capacity is 1086 megawatts. The two natural gas turbines that are owned by an EEI subsidiary are rated at 76 gross megawatts total.

Page 3, Section 2.2, second paragraph

We suggest making the following changes to this paragraph:
"CCW consists of bottom ash and fly ash. Bottom ash generated at the Joppa Plant is hydraulically sluiced to the Southern Pond. Fly ash *which is collected using electrostatic precipitators* was previously sluiced to the Ash Pond but it is now ~~collected using electrostatic precipitators,~~ pneumatically *conveyed* ~~sluiced~~ to storage silos and finally sold for reuse. *The market for the fly ash generated at the Joppa Plant has greatly diminished since the plant started injecting powered activated carbon upstream of the electrostatic precipitators in response to Illinois mercury removal requirements.* Dewatered bottom ash is excavated and sold for reuse, ~~although the market for the bottom ash generated at the Joppa plant has greatly diminished since the plant switched from Southern Illinois to Western Coal in response to Clean Air Act requirements on sulfur emissions.~~ The plant still reclaims "legacy" ash ~~generated prior to the switch in coal type/source~~. "

Page 4, Section 2.3, third paragraph

EEI is the owner and operator of the Joppa Station as described on Page 2 of the report. Please strike "and Ameren" and change "comply" to "complies" in the second sentence of this paragraph.

Post Office Box 165 Joppa, Illinois 62953 (618) 543-7531 Fax: (618) 543-7420

Page 4, Section 2.3, fourth paragraph

As noted above, please delete the reference to Ameren from the fourth and fifth sentences of this paragraph.

Page 9, Table 3.2

Michael Mercer's name is misspelled.

Page 13, Section 5, first paragraph, fourth bullet

This bullet lists "No active control for flow through the Central Dike Culvert" as a deficiency. EEI intentionally leaves the Central Dike Culvert between the north and south ash ponds open to act as an emergency spillway. The elevation of the culvert is such that at normal water elevations there is very little to no water flow from the south pond to the north pond. The water that does go to the north ash pond discharges to the same NPDES outfall location as the south pond. In the event that EEI needs to temporarily block all flow from the south pond to the north pond, a steel or plywood plate can be placed over the inlet to the culvert. EEI requests deletion of this bullet as a deficiency.

Please contact Mr. Bruce Parker, Senior Engineer, at (618) 543-3458 if there are any questions regarding this response. Also future correspondence regarding the Joppa Station should be addressed to me at the address on the bottom of this letter.

Sincerely,

W H Sheppard

William H. Sheppard
President

WHS:BP

bc: M. Pullen
T. Larbes
B. Parker