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August 8, 2011

Mr. Stephen Hoffman
U.S. Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive
5th Floor, N-5237
Arlington, VA 22202-2733

RE: Coal Ash Impoundment Site Assessment Final Report
Dallman Power Station, City of Springfield, Illinois

Dear Mr. Hoffman:

This is a response on behalf of City of Springfield, Illinois, City Water, Light and Power (CWLP) to United States Environmental Protection Agency's ("EPA") July 7, 2011 email requesting CWLP to inform you of our plans to address the recommendations in EPA's Coal Ash Impoundment Site Assessment for the Dallman Power Station. The Ash Pond Assessment of the City of Springfield's Dallman Power Station was conducted on August 13, 2010, by EPA contractor, Kleinfelder.

The Final Report noted, among other things, that one of CWLP's ash ponds has a permit issued by the Illinois Department of Natural Resources (IDNR), with a Hazard Classification of III, while the National Inventory of Dams includes the Lakeside Ash Pond with a Hazard Classification of "low".
The assessment report contained eight recommendations. CWLP responds to each of these recommendations as follows;

Section 6.2, Priority 1 Recommendations

1. *Prepare an emergency action plan for the facility by 10/1/2011.*

   CWLP plans to incorporate the ash impoundments into the existing emergency action plan (EAP) for Spaulding Dam, which is on the same property, just south of the ash ponds. The existing EAP for Spaulding Dam is administered through the Illinois Department of Natural Resources (IDNR). CWLP will proceed in having this completed by an established timeframe determined by IDNR.

2. *Perform a hydrologic and hydraulic study by 10/1/2011.*

   CWLP is currently undergoing an Ash Pond Assessment with the Illinois Environmental Protection Agency (IEPA) and this recommendation could be addressed in conformance with the IEPA's review. Additionally, CWLP has received an estimate from an engineering company for the cost of this study, and intends to budget this work in the next fiscal year (March 2012 through February 2013).

3. *Establish seepage and groundwater monitoring program by 10/1/2011.*

   CWLP is currently undergoing an Ash Pond Assessment with IEPA and this recommendation could be addressed in conformance with the IEPA's review. Additionally, CWLP has received an estimate from an engineering company for the cost of the development and implementation of this program, and intends to budget this work in the next fiscal year (March 2012 through February 2013).

4. *Perform embankment and structure stability analysis by 10/1/2011.*

   The ash impoundments are currently under the regulatory authority of IDNR pursuant to IDNR's regulations for the construction and maintenance of dams, covering, among other issues, the structural stability of berms and embankments. One of our ponds is permitted by IDNR under these regulations. CWLP plans to request that IDNR perform a hazard classification assessment on our ash pond structures. Based on the IDNR assessment, if a stability analysis and/or additional investigation of the structures are warranted, CWLP will proceed in having this completed by an established timeframe determined by IDNR. Additionally, CWLP has received an estimate from an engineering company for the cost of this analysis and intends to budget this work in the next fiscal year (March 2012 through February 2013).

5. *Control vegetation in the upstream and downstream slopes. Remove the trees from the embankment including the large tree at the overflow outlet discharge point by 10/1/2011.*

   CWLP has begun to remove and control the vegetation, however, due to heavy precipitation in the spring and early summer, some of these areas have been difficult to gain access to with heavy machinery. Once these areas are accessible, CWLP will remove the trees and additional brush on the embankments. CWLP expects to complete this work by January 1, 2012. CWLP will continue to perform regular mowing or chemical spray to control brush and weeds.

Section 6.3, Priority 2 Recommendations

1. *Repair erosion of embankment on an as needed basis.*

   During regular embankment inspections, if inadequacies are noted, CWLP will repair areas that show signs of erosion.

2. *Maintain a log of maintenance and other activities at the fly ash impoundments and supportive facilities on an ongoing basis.*

   A preventative maintenance schedule has been established through our work order system, which documents all major activities that occur at the ash ponds.

3. *Develop an Operation and Maintenance manual for the impoundments and the facility by 10/1/2011.*

   CWLP has a current Operations and Maintenance manual for the ash impoundments that was provided to the Agency during their inspection. CWLP will review and update this manual by January 1, 2012.

CWLP notes that Kleinfelder's inspection of ash pond stability was conducted under the authority claimed by EPA under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) which EPA apparently is not now relying upon for its recommendations. As noted above, Illinois has established regulations covering ash pond stability, as well as the environmental impacts of ash ponds through the regulations of IDNR and those of the Illinois Pollution Control Board implemented by the IEPA. In addition, as you know, the EPA has proposed a Coal Combustion Residual rule that will likely impact the engineered aspects of ash ponds, taking into consideration the hydrological and structural aspects of ash ponds, and which may also force ash pond closure. Under these regulatory uncertainties and overlap, CWLP has and will continue to take every reasonable effort to make CWLP's ash impoundments structurally sound and environmentally secure. Accordingly, CWLP appreciates the information in the Final Report. If you should have any questions or require additional information, please do not hesitate to contact Sue Corcoran, of my staff, or myself at (217) 757-8610.

Sincerely,

P.J. Becker
Environmental Health & Safety Manager

PJB/gj

Cy: Christine Zeman (CWLP)
John Davis (CWLP)

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