Comments:

EPA: None

State: None

Company: See letter below dated December 28, 2010

Cy: Christine Z.
John Davis

OFFICE OF PUBLIC UTILITIES
CITY OF SPRINGFIELD, ILLINOIS

TIMOTHY J. DAVLIN, MAYOR

R. TODD RENFROW, GENERAL MANAGER

December 28, 2010

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

Dear Sir:

On August 13, 2010, an Ash Pond Assessment was conducted by USEPA contractor, Kleinfelder of the City of Springfield's Dallman Power Station. USEPA cited that this investigation was to be done pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601-9675 (CERCLA).

City Water, Light & Power (CWLP) recognizes the Agency's intention, and the value of the inspection and report. We question, though, whether CERCLA is the appropriate authority for determining structural integrity of ash ponds, especially through the process leading to the draft report. For example, to our knowledge, the use of the Hazard Classifications and Priority 1 and 2 Recommendations are not CERCLA definitions or responses.

CWLP appreciates the opportunity to comment on the prepared Coal Ash Impoundment Site Assessment Draft Report for the Dallman Power Station, Springfield, Illinois. CWLP recommends the following changes, including for accuracy:

P.9, Section 3.1 Site Information and History. First paragraph:

> *The City of Springfield Operates two coal-fired power generation facilities, the V.Y. Dallman Power Station and the Lakeside Power Station, as well as a potable water treatment plant. All three of these facilities are located at the same site, which is on the west side of Lake Springfield near Spaulding Dam. The Lakeside Power Station was constructed in the 1930's and the Dallman Power Station was constructed in the 1970's. The Dallman Power Station contains three coal-fired boilers, and the Lakeside Power Station contains two coal-fired boilers.*
>
> The Lakeside Power Station was retired January 2009. Please add this statement to the end of this paragraph.

P. 9, Section 3.1 Site Information and History. Third paragraph:

The Lakeside Ash Pond is primarily a diked embankment with some incising along the east perimeter. Cell 3 is no longer receiving ash and is in the process of being closed. Cells 1, 2 and 4 continue to receive ash and filter cake sludge material. Sluice pipes transporting ash from power generating operations discharge into the southwest corner of the pond. Water from the Lakeside Ash Pond discharges into the clarification pond shown in Figure 2. The clarification pond is part of the original Lakeside Ash Pond that was not raised when the remainder of the Lakeside Ash Pond was raised. The clarification pond is used as a final settling pond before discharging water from the pond to Sugar Creek.

As commented above, Lakeside Power Station was retired in 2009. The Ash Pond is no longer receiving ash, and it is not in the process of being closed. It still receives scrubber blowdown and filter cake sludge from the Drinking Water Facility.

P. 14, Section 3.8 Hazard Classification

The Dallman Ash Pond is not regulated by any state agency and therefore does not currently have a designated hazard rating. The Lakeside Ash Pond is regulated by the Illinois Department of Natural Resources and is classified as a "Low Hazard" potential. However, due to the potential environmental and economic impacts that a failure at either of these impoundments would pesent, it is recommended that a hazard classification of "Significant" be assigned to both impoundments. A "High Hazard" rating was not assigned to the impoundments, because it is not expected that a loss of life situation would be likely in the event of a failure. A loss of life situation is not expected because the ash ponds are immediately adjacent to the Sugar Creek without any homes, recreational facilities, businesses, roads, or other structures immediately downstream of the impoundments.

CWLP disagrees with a Hazard Classification of "Significant". This is not supported by the reasoning provided in the last sentence of this paragraph.

P. 15, Section 4.2.2 Crest

The crest is dissected at several locations by sluice piping that enters the pond from the west side (see Photograph 8 as an example).

The crest is not dissected. Piping is laid across the surface. The collection of ash on the surface makes it appear to cut the crest. In addition, photographs 8, 10 and 12 should have the description changed to remove the notes referring to a cut in the embankment, as these photos do not depict the embankment.

P. 18, Section 5.1 Analysis and Conclusions

Changes in Design or Operation of the Impoundments following Initial Construction
The Lakeside Ash Pond embankment was raised approximately 10 feet in 1987-1988. This modification was designed by Hanson Professional Services and has been monitored by Hanson annually.

The word "annually" should be changed to "periodically and at a minimum, every 5 years". The berm is only required to be inspected every 5 years, but CWLP has had Hanson inspect it more frequently, on a needed basis.

P. 20-21, Section 6 – Recommendations

Section 6.2, Priority 1 Recommendations

1. *Prepare an emergency action plan for the facility by 3/1/2011.*
2. *Perform a hydrologic and hydraulic study by 12/31/2010.*
3. *Establish seepage and groundwater monitoring program by 3/1/2011.*
4. *Perform embankment and structure stability analysis by 3/1/2011.*
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 12/31/2010.*
6. *Establish sufficient freeboard for west embankment of Dallman Ash Pond at sluice pipe notches by 12/31/2010.*

Section 6.3, Priority 2 Recommendations

1. *Repair erosion of embankment on an as needed basis.*
2. *Maintain a log of maintenance and other activities at the fly ash impoundments and supportive facilities on an ongoing basis.*
3. *Develop an Operation and Maintenance manual for the impoundments and the facility by 7/2/2011.*

CWLP agrees that many of these recommendations are appropriate and they will be implemented on a yet to be developed schedule. Most schedule dates in the assessment are not obtainable. CWLP is currently undergoing an Ash Pond Assessment with the Illinois Environmental Protection Agency (IEPA) and some of these items could be addressed in conformance with their findings.

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,

S. David Farris, CIH, CSP
Environmental Health & Safety Manager

SDF/SC/gj