Comments on Draft Report Dominion –Kincaid

EPA: None

State: None

Company: See letter dated December 21, 2010

Pamela F. Faggert
Vice President and Chief Environmental Officer

Dominion Resources Services, Inc.
5000 Dominion Boulevard, Glen Allen, VA 23060
Phone: 804-273-3467

Dominion®

December 21, 2010

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

Re: Comments on EPA Draft Assessment Report for Dominion Power's Kincaid Generation

Dear Mr. Hoffman:

Thank you for providing the opportunity to comment on the draft Dam Safety Assessment of CCW Impoundments for Dominion's Kincaid Generation. Our comments are provided as Attachment A.

After the Kingston Ash Dredge Cell failure in late 2008, Dominion proactively conducted extensive re-evaluations of management practices of its ash ponds, including those that were not regulated as dams. Based on these evaluations, we developed and have implemented action plans to address identified issues. We will continue our activities to make improvements. In light of these efforts, we request that EPA establish a method for recognizing these improvements and reassessing the condition ratings identified in the Dam Safety Assessments of CCW Impoundments.

If you have any questions, please contact Mr. Glenn Johnson at (804) 273-2946.

Sincerely,

Pamela F. Faggert

Pamela F. Faggert

Enclosure: Attachment A

ATTACHMENT A – Comments for Kincaid Generation

1. Page 6, Section 3.1.1: The statement that the facility practice is to open the emergency outlet in advance of predicted precipitation is inaccurate. The emergency outlet is used only as a last resort to prevent embankment overtopping. It has only been opened once in the last five years. Instead, if the facility observes the water level getting too high or there is an expectation of a large amount of precipitation, the normal practice is to divert slag field water through the wastewater treatment plant effluent (permitted Outfall B01).

2. Page 11, Section 6.2 First bullet: Please indicate that Dominion completed repair of the area of slope erosion on the western portion of the south bank as of October 19, 2010.

3. Page 11, Section 6.2 Second bullet: Please indicate that Dominion completed the rip-rap reinforcement project as of November 17, 2010.

4. Page 11, Section 6.2: Third bullet: Please indicate that Dominion completed stump removal and regrading as of October 18, 2010. Reseeding of the repaired areas was conducted in the first two weeks of December 2010 and the facility will continue efforts to establish and manage vegetation.

5. Page 11, Section 6.2: Fourth bullet: Please indicate that Dominion will keep documentation of the repair work on file.