PACIFICORP ENERGY
A DIVISION OF PACIFICORP
DAVE JOHNSTON STEAM ELECTRIC PLANT
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Mr. Stephen Hoffman
US Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive
5th Floor, N-5237
Arlington, VA 22202-2733

Dear Mr. Hoffman,

On July 28, 2011, the PacifiCorp Dave Johnston Power Plant received the final report for the Coal Ash Site Assessment conducted by EPA and its contractor on October 27, 2010. The letter that accompanied the report requested that the Dave Johnston Plant respond to each of the recommendations noted in Enclosure 2.

This letter and the attached document represent the Dave Johnston Plant's response to EPA's request. Each of the recommendations has been addressed with specific actions PacifiCorp will take, including a projected date of completion.

Prior to EPA's site assessment, PacifiCorp contracted with a firm specializing in dams and complex geotechnical studies to do a structural evaluation of the Dave Johnston Plant's coal combustion waste impoundments. The conclusion of that evaluation was very similar to the results of EPA's site assessment. That is, the impoundments at the Dave Johnston Plant exhibit no signs of structural instability.

PacifiCorp is committed to responsible environmental stewardship and safety at each of its facilities. Should you have questions concerning this response, please feel free to contact Anne Prettyman at (307) 995-5055 or me at (307) 995-5001.

Sincerely,

Ricky L. Tripp
Plant Managing Director

Enclosure

cc: Bill Lawson – 310 NTO
Brett Shakespear – 310 NTO
Alan Dugan – Dave Johnston Plant
Anne Prettyman – Dave Johnston Plant
Dawn Cerny – Dave Johnston Plant

PacifiCorp Response to EPA Recommendations

11.1 Corrective Measures and Analyses for the Structures

1. A geotechnical exploration program should be performed to classify the embankment and foundation soils of the following impoundment features (See Figure 2 of the final report):

a. 1A/1B Clear Pond south dam
b. 4 Clear Pond south embankment dam.

The exploration program should include subsurface drilling and geotechnical soils testing. Soil testing should include index property and strength tests. The exploration program should provide the necessary information to perform the slope stability analyses described below.

PacifiCorp Response: An engineering firm will conduct a geotechnical exploration of the south dam of the 1A and 1B Clear Ponds, and the 4 Clear Pond south embankment dam by December 15, 2011.

2. Slope stability analyses should be performed on the following impoundment features:

a. 1A/1B Clear Pond south dam
b. 4 Clear Pond south embankment dam.

Slope stability analyses should be performed on the maximum embankment section with a phreatic surface representative of steady seepage under normal operating conditions. Stability analyses should be performed for the full range of expected loading conditions, including appropriate application of surcharge loads from equipment operating on the embankment crests.

PacifiCorp Response: An engineering firm will conduct a slope stability analysis of the south dam of the 1A and 1B Clear Ponds, and the 4 Clear Pond south embankment dam by December 15, 2011. The analysis will be conducted using the data gathered in completing the geotechnical exploration recommended in item 11.1.1.

3. Hydrologic analyses should be performed to evaluate the IDF and accurately assess the ability of the Ash Ponds to store the IDF. Consistent with the results of the hydrologic analyses, the Ash Pond structures and/or operations should be modified to allow safe storage and/or passage of the IDF.

PacifiCorp Response: A hydrologic analysis of the ash ponds at the Dave Johnston plant will be conducted to determine the ability of the ponds to store the IDF. The analysis will be completed by December 15, 2011.

11.2 Corrective Measures Required for Instrumentation and Monitoring Procedures

See Section 11.3.

11.3 Corrective Measures Required for Maintenance and Surveillance Procedures

Implement early warning measures to more closely monitor water levels in the Ash Ponds and reduce the potential for overtopping failure of the embankments. Early warning measures could include enhanced visual surveillance and/or automated water level and alarm systems. Automated water level and alarm systems, if included in the early warning measures, should be installed at the 1A and 1B Clear Ponds and the 4 Clear Pond.

PacifiCorp Response: PacifiCorp has implemented comprehensive inspection procedures based on information obtained from an investigation of its coal ash impoundments by a geotechnical firm specializing in dams and embankments. Visual inspections are performed on a daily basis, and more frequently as conditions require. Investigations by geotechnical professionals occur at a five year frequency.

PacifiCorp considers the current inspection procedures an adequate measure of safety for the site conditions.

11.4 Corrective Measures Required for the Methods of Operation of the Project Works

None.