Comments on Pacificorp Wyodak Power Station Report.

EPA:

Can you confirm that the surrounding power plant(s), e.g. Black Hills Neil Simpson Power Plant, do not have any impoundments of their own that would need to be assessed under EPA's national structural integrity assessment effort? Can you confirm that these plant(s) exclusively use the North Pit Ash Pond for the CCR they dispose of?

Appendix A: the unit name should be on the checklist along with the name of the power plant.

State: None

Company: See attached letter dated February 22, 2011

EPA Contractor Response: See attached email dated April 29, 2011

PACIFICORP ENERGY
A PACIFICORP COMPANY
Wyodak Plant
48 Wyodak Road
Gillette, WY 82718

February 22, 2011

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

Subject: PacifiCorp comments regarding the draft Site Assessment for Coal Ash Impoundments at PacifiCorp Energy Wyodak Facility.

Dear Mr. Hoffman:

On January 24, 2011, PacifiCorp Energy received a request to review and comment on the Specific Site Assessment for Coal Combustion Waste Impoundment at PacifiCorp Energy, Wyodak Power Station. The site assessment was conducted on October 26, 2010, by EPA representatives and GEI Consultants to evaluate the safety of coal combustion waste impoundments at the plant.

PacifiCorp has no comments on the draft report.

Prior to EPA's site assessment, PacifiCorp contracted with a firm specializing in dams and complex geotechnical studies to do an evaluation of all company owned 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 Wyodak Plant exhibit no signs of structural instability. PacifiCorp is committed to responsible environmental stewardship and safety at each of its facilities.

Please contact Brett Shakespear at (801) 220-2575, or via email at Brett.Shakespear@PacifiCorp.com if you have additional questions.

Sincerely,

Gary L. Harris

Gary L. Harris
Plant Managing Director

FINAL SSA Reports -- CLIN 003 and 004 PacifiCorp Wyodak and Dave Johnston Power Plants
Daigle, Thomas
to:
Jana Englander
04/29/2011 05:14 PM
Cc:
James Kohler, Stephen Hoffman, "Brown, Stephen G", "Johnson, Brian"
Show Details

Jana,

The following two Final SSA Reports are available for download from GEI's sharefile site:

CLIN 003 PacifiCorp Energy Wyodak Power Station
CLIN 004 PacifiCorp Energy Dave Johnston Power Plant

Please let me know if you have any difficulty accessing the site.

Below is a summary of how we addressed the comments.

EPA comments on Wyodak:
Since we only spoke with Wyodak personnel, we cannot confirm that the surrounding Black Hills Energy plants do not have any impoundments of their own that would need to be assessed under EPA's national structural integrity assessment effort. Also, since we did not speak with Black Hills personnel, we cannot confirm that the surrounding plants exclusively use the North Pit Ash Pond.

PacifiCorp Comments on Wyodak:
None provided.

EPA Comments on Dave Johnston:
We made the edits noted in the comments.

PacifiCorp Comments on Dave Johnston:
We made the edits noted in the comments for sections 2.1 and 2.4.
For Section 5.0, we understand that the Probable Maximum Precipitation (PMP) figure we used to calculate the Inflow Design Flood (IDF) is less than the average annual precipitation at the plant, however, we did not modify the figure. The PMP was developed from Hydrometeorological Report No. 55A (HMR 55A), which is the governing document for PMP Development at the Dave Johnston Plant. The 72-hour PMP value, as shown on Plate IVb of HMR 55A is approximately 33.4 inches. Reducing this value to 50% produces a 72-hour PMP of 16.7 inches, which is the recommended value to be used for hydrologic and hydraulic designs.

Please let me know if you have any questions. Thank you.

--Tom

Tom Daigle
Project Geologist
GEI Consultants, Inc.
4601 DTC Blvd. Suite 900
Denver, CO 80237
Office: 303.264.1090
Cell: 339.221.3499

SSA CLIN 004 Comment Correction
Daigle, Thomas
to:
Jana Englander
04/29/2011 05:28 PM
Cc:
Stephen Hoffman, James Kohler, "Brown, Stephen G", "Johnson, Brian"
Show Details

History: This message has been replied to.
Hi Jana,

In our response to PacifiCorp's comments on the Dave Johnston report I meant to say that we understand the PMP figure we used to calculate the IDF is *greater* than the average annual rainfall at the plant, however, we did not change the figure. Please let me know if you have any questions.

--Tom

Tom Daigle
Project Geologist
GEI Consultants, Inc.
4601 DTC Blvd. Suite 900
Denver, CO 80237
Office: 303.264.1090
Cell: 339.221.3499
Fax: 303.662.0100
tdaigle@geiconsultants.com

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