

Comments

EPA: None

State: None

Company: See attached letter dated November 30, 2010.

November 30, 2010

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

Subject: Draft Dike Assessment Report Comments
Winyah Generating Station – Georgetown, SC

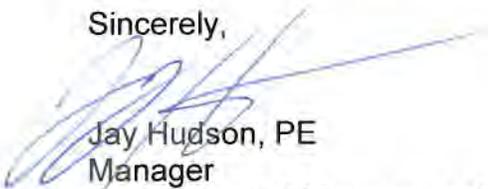
Dear Mr. Hoffman:

South Carolina Public Service Authority (Santee Cooper) received and reviewed the draft dike assessment report for the Winyah Generating Station which resulted from the site assessment conducted by your contractor, Dewberry & Davis, LLC., on June 29 and 30, 2010. Attached is a summary of recommended corrections and comments, two drawings, and a supplemental report dated 1978.

The impoundments are under the regulatory authority of the South Carolina Department of Health and Environmental Control. Santee Cooper has an excellent track record with regard to the safety of our coal combustion residual storage impoundments and is fully committed to maintaining this record.

Santee Cooper makes no confidentiality claims with respect to material contained in the draft report or with respect to this correspondence. Please contact me at 843-761-8000 if you have any questions.

Sincerely,



Jay Hudson, PE
Manager
Environmental Management

JAH:SWJ:DBB:dks

Attachment

**Santee Cooper Winyah Generating Station
Comments on Draft Dam Assessment Report
by
Dewberry & Davis, LLC
Dated August 2010**

Santee Cooper has reviewed the draft assessment report prepared by Dewberry & Davis, LLC, for the impoundments containing coal combustion residuals at the Winyah Generating Station. Santee Cooper appreciates the consultant's thoroughness and we concur with the overall conclusion that all of "the impoundments appear structurally sound, and there are no observed signs of overstress, significant settlement, shear failure, or other signs of instability" and, "no visual signs of imminent instability or serious inadequacy of the principal structures at these basins that would require emergency remedial action were observed." Santee Cooper has attached additional documentation to supplement the previous submittal. The following comments include references to the supplemental information.

Draft Report Corrections:

1. South Ash Pond – regarding the abandoned CMP construction drainage pipe. Santee Cooper submits the following correction to information provided to the inspector in June, 2010 and requests all references to this inadvertent omission be corrected including the following sections: Page 1-2, section 1.1.1; page 1-5, section 1.1.6; page 1-7, section 1.2.1; page 1-8, section 1.2.6; and page 2-10, section 2.4.1 -

Remedial work to secure the plug on the abandoned CMP construction drainage pipe penetrating the South Ash Pond was completed in 2008 at the same time as the work to secure the plugs on similar CMP's penetrating the West Ash Pond and the U3 & 4 Slurry Pond was completed.

After construction of the Unit 3 & 4 Slurry Pond, West Ash Pond, and South Ash Pond perimeter dikes was completed in 1980, the pipes were plugged at the outlet and abandoned. See attached drawing 3-CV-555 for the original detail on the manner of plugging.

2. Unit 3 & 4 Slurry Pond - Correct the description of repairs to the abandoned CMP construction drainage pipe penetrating the Unit 3 & 4 Slurry Pond. All references to this repair should be corrected including the following sections: Page 2-10, Section 2.4.1; Page 3-2, Section 3.3; Page 4-3, Section 4.1.3; Page 5-9, Section 5.6.1; and Page 5-10, Section 5.6.2 -

The abandoned 30-inch CMP construction drainage pipe through the northwest corner of the Unit 3 & 4 perimeter dike required repair in March, 2008 when leakage developed at the pipe outlet. Drawing 3-CV-555 (attached) shows a one foot thick concrete plug was placed at the outlet of the pipe after completion of construction. This plug apparently failed, allowing leakage from the basin. A cofferdam was

constructed around the leak area to equalize the head and reduce the flow through the pipe. A 60' long by 45' deep cement-bentonite slurry wall was constructed along the centerline of the dike to create an impermeable barrier. In addition, the downstream portion of the CMP as well as any voids in the surrounding soils was sealed using cement-bentonite fill.

3. Page 2-11, Section 2.4.2, second paragraph –
Change the following from “There is no other outlet from Ash Pond B.”
To “There is no other outlet from Ash Pond A.”
4. Page 3-1, Section 3.3, South Ash Pond
Add the following sentence to the discussion on the South Ash Pond. “As previously mentioned, an abandoned CMP construction drain pipe through the perimeter dike along the south western side of the South Ash Pond was located and sealed along with the surrounding soil using a cement-bentonite slurry wall, to preclude a leakage problem occurring there, as happened at a similar abandoned construction drain through the Unit 3 & 4 Slurry Pond perimeter dike.”
5. Page 4-2, Section 4.1.2, Ash Pond B
Add to the end of this paragraph “The expansion was designed by Paul C. Rizzo Associates, Inc, (PCRA) a FERC approved Independent Consultant for dam safety assessments. The geotechnical investigation performed in conjunction with PCRA’s design indicated the embankments were well constructed.”
6. Page 4-3, Section 4.1.3, South Ash Pond
Change the following from “There have been no significant repairs and/or rehabilitation made to this basin since the original construction.”
To “The abandoned 30-inch CMP construction drain through the southwest side of the perimeter dike was located and sealed along with the surrounding soil using a cement-bentonite slurry wall after a leak occurred through a seal plug at a similar abandoned construction drain through the Unit 3 & 4 Slurry Pond perimeter dike.”
7. Page 4-3, Section 4.1.3, West Ash Pond
Change the following from “The abandoned 30-inch CMP construction drain through the southwest corner of the basin was located and completely filled with concrete after a leak occurred through a seal plug at a similar abandoned construction drain through the Unit 3 & 4 Slurry Pond perimeter dike.”
To “The abandoned 30-inch CMP construction drain through the southwest corner of the perimeter dike was located and sealed along with the surrounding soil using a cement-bentonite slurry wall after a leak occurred through a seal plug at a similar abandoned construction drain through the Unit 3 & 4 Slurry Pond perimeter dike.”
9. Page 4-4, Section 4.2.3, first paragraph
Change the following from “Fly ash is generally dry handled and trucked to Southeastern Fly Ash, where it is burned and used in cement;”

To “Fly ash is generally dry handled and conveyed to Southeastern Fly Ash on-site, where the excess carbon is removed for energy recovery and the remaining ash is processed for use in cement;”

10. Page 5-7, Section 5.4.2, Outlet Conduit

Add to the end of this paragraph “As previously mentioned, the abandoned 30-inch CMP construction drain through the southwest side of the perimeter dike was located and sealed along with the surrounding soil using a cement-bentonite slurry wall as a precautionary measure after a leak occurred through a seal plug at a similar abandoned construction drain through the Unit 3 & 4 Slurry Pond perimeter dike.

11. Page 5-9, Section 5.5.2, Outlet Conduit

Add to the end of this paragraph “As previously mentioned, the abandoned 30-inch CMP construction drain through the southwest corner of the perimeter dike was located and sealed along with the surrounding soil using a cement-bentonite slurry wall as a precautionary measure after a leak occurred through a seal plug at a similar abandoned construction drain through the Unit 3 & 4 Slurry Pond perimeter dike.”

12. Page 5-9, Section 5.6.1, clarification regarding construction of the pump station near the Unit 3 & 4 Slurry Pond

A pump station was constructed at the northwest corner of the Unit 3 & 4 Slurry in 2004 in the vicinity of the original drainage ditch as part of an overall improvement to stormwater management at the generating station.

13. Page 7-1, Section 7.1.2 and Page 7-2, Section 7.1.4

Edit these sections after reviewing the soil design properties for the South Ash Pond, West Ash Pond, and Unit 3 & 4 Slurry Pond contained in the attached S&ME report.

14. Page 9-1, Section 9.1

Rephrase the statements in line 3 and the last sentence of this section to clarify the intent of the BMP plan is to train operating personnel to conduct routine, periodic inspections of the impoundment dikes and have qualified dam safety personnel assist operating personnel with the quarterly inspections as requested. A copy of section 4.9 of the BMP plan was previously provided.

15. All occurrences of the term Coal Combustion Waste and CCW should be changed to Coal Combustion Residual and CCR.

16. Minor typographical errors in the draft report are not included in this summary.

General Comments to Draft Report Content:

1. Page 6-2, Section 6.1.3, Spillway Rating

The impoundment outfall structures, where they exist, are simple flash board control structures with a simple overflow weir; therefore, it is not practical to have rating curves. The impoundments which utilize pumping to control water levels are typically

managed below the maximum design water surface elevation in order to provide operational flexibility during heavy rainfall events. Forecasting storm events is advanced and allows Santee Cooper to stage additional pumps as needed to control free water levels in the impoundments.”

2. Page 6-3 and 6-4, Section 6.1.4, Unit 2 Slurry Pond
Unit 2 Slurry Pond is maintained in a dewatered condition. Excess water from the CCR as well as any stormwater that enters the impoundment are collected and pumped to the intake canal. A failure of the Unit 2 Slurry Pond dike therefore does not have the potential to release CCR into the surrounding area, and is not capable of causing danger to humans or economic or environmental losses, or disruption of generating station operations.

Comments to Consultant’s Conclusions and Recommendations:

1. Conclusions/Recommendations Regarding Structural Stability and Soundness

- a. Static Stability - page 1-1, section 1.1.1; page 1-3, section 1.1.3; page 1-6, section 1.2.1; page 1-7, section 1.2.3; page 7-1, Section 7.1.1; and, page 7-3, section 7.2.-
Throughout the report, the consultant recommends, “Santee Cooper verify static stability of the South Ash Pond perimeter dike and the West Ash Pond/Unit 3 & 4 Slurry Pond perimeter dike with documented analyses.”

Comment -

Santee Cooper has retrieved a 1978 report prepared by Soil & Material Engineers, Inc. (S&ME) which documents adequate static stability for the South Ash Pond perimeter dike and the West Ash Pond/Unit 3 & 4 Slurry Pond perimeter dike; and confirms the conclusion reached by Dewberry & Davis based on visual observations that “the embankment dikes probably have adequate stability under static loading conditions.” A copy of the S&ME report is attached for your review and use in editing the consultant’s draft dam assessment report.

- b. Page 1-6, Section 1.2.1 -
“It is recommended that Santee Cooper perform an engineering review of foundation soil conditions at the South Ash Pond perimeter dike and the West Ash Pond/Unit 3 & 4 Slurry Pond perimeter dike in greater detail and determine what, if any, limited or detailed analyses of seismic stability and liquefaction potential should be performed.”

Comment -

The attached report by S&ME includes a detailed engineering review of the foundation soil conditions at the South Ash Pond perimeter dike and the West Ash Pond/Unit 3 & 4 Slurry Pond perimeter dike.

At all generating stations owned and operated by Santee Cooper, the Coal Combustion Residual (CCR) impoundment dikes are not currently nor have they ever been required by Federal or State standards to analyze seismic stability and liquefaction potential; furthermore, these analyses were not required as part of the original permit needed to construct the CCR impoundments at Winyah Generating Station. Given the low height and generally low consequences of failure, the generally good condition of the basins and embankments, CCR consolidation, and

exceptional performance record of Ash Pond A, Ash Pond B, Unit 2 Slurry Pond, South Ash Pond, and the West Ash Pond; the seismic stability and liquefaction potential analyses of these dikes is not a critical need at this time. However, Santee Cooper will evaluate the need to assess the seismic stability and liquefaction potential at the Unit 3 & 4 Slurry Pond.

c. Page 1-7, Section 1.2.1 -

“It is recommended that Santee Cooper investigate the apparent problem conditions along the active (RCP) outlet penetration through the Ash Pond B perimeter dike and along the abandoned (apparent CMP) outlet penetration through Ash Pond A perimeter dike and implement appropriate remedial actions, as needed. It is further recommended that Santee Cooper review the status of the abandoned CMP construction drain through the South Ash Pond perimeter dike and implement appropriate remedial actions.”

Comment –

Santee Cooper is evaluating remedial options for addressing the active RCP outlet penetration through the Ash Pond B perimeter dike and along the abandoned (apparent CMP) outlet penetration through Ash Pond A perimeter dike.

Appropriate action will be taken by Santee Cooper based on the results of our evaluation, ranging from repair to full replacement for the Ash Pond B outlet and appropriate sealing of the Ash Pond A outlet

In March, 2008 the abandoned CMP construction drain through the South Ash Pond perimeter dike, was sealed using a cement-bentonite slurry wall (60' long and 45' deep). In addition, the downstream CMP as well as the surrounding soils were sealed using cement-bentonite fill. This is a correction to information provided at the time of the inspection.

2. Conclusions/Recommendations Regarding the Hydrologic/Hydraulic Safety

a. Page 1-2, Section 1.1.2; and Page 1-7, Section 1.2.2 -

“It is recommended that Santee Cooper verify the Hydrologic/Hydraulic safety of the Unit 3 & 4 Slurry Pond and West Ash Pond with documented analyses.”

Comment –

As stated in Section 6 of the draft report, Santee Cooper CCR impoundments are specifically excluded from state regulation under the SCDHEC Dams and Reservoirs Safety Act Regulations because the state recognizes Santee Cooper's jurisdiction over its own dams. However, Dewberry & Davis uses elements of this Act to determine if the Hydrologic/Hydraulic safety of the Unit 3 & 4 Slurry Pond and West Ash Pond should be analyzed. Although, Santee Cooper CCR impoundments are not regulated by state or federal dam safety standards there are self-imposed standards evident by the following statement found in the Dewberry & Davis draft report: “Santee Cooper representatives stated that the drainage structures at the station are designed for the 25-year frequency, 24-hour duration rainfall event.”

Given the low height and generally low consequences of failure, the generally good condition of the basins and embankments, CCR consolidation, and exceptional performance record Santee Cooper agrees analyses of the Hydrologic/Hydraulic Safety of the Unit 3 & 4 Slurry Pond and West Ash Pond

are not critical at this time. However, since neither impoundment has a permanent gravity outlet structure and both rely on the mechanical release of water, Santee Cooper will analyze and verify the hydrologic/hydraulic safety relative to the available freeboard.

- b. Section 5.0 – discussion of emergency spillways at Ash Pond A and Ash Pond B -

Comment –

While the emergency spillways shown on the design drawings at Ash Pond A and Ash Pond B were not part of the recommendation, Santee Cooper would like to clarify this issue as it relates to hydrologic and hydraulic safety. Dewberry & Davis points out they could not locate the emergency spillways at Ash Pond A and Ash Pond B. In addition, Santee Cooper can not find any evidence that the emergency spillways at Ash Pond A and Ash Pond B were constructed as part of the original construction. Evidence that these spillways may not have been constructed is supported by the fact that the primary purpose of an emergency spillway is to route off-site drainage (that cannot safely be stored in the basin) through the basin so it does not overtop the perimeter dike. As stated in the Dewberry & Davis draft report, “The basins are contained and isolated by the dike embankments, so that they do not receive off-site drainage”; thus the design need for an emergency spillway is not critical. It is also important to note, that these impoundments are similar to the other CCR impoundments at Winyah Generation station in that they do not have a contributing stream or drainage basin and they also do not have emergency spillways. .

3. Conclusions/Recommendations Regarding the Supporting Technical Documentation

- a. Page 1-2, Section 1.1.3; and Page 1-7, Section 1.2.3 -

The consultant recommends Santee Cooper provide supporting technical documentation for recommendations in sections 1.2.1 and 1.2.2.

Comment –

Please see comments provided to conclusions/recommendations in 1 and 2 above.

4. Conclusions/Recommendations Regarding the Description of the Management Unit(s)

- a. Page 1-3, Section 1.1.4 –

Attached, are Drawings 3-CV-555 and 3-C-591 which show details for the South Ash Pond outlet structure.

- b. Page 1-7, Section 1.2.4 -

“It is recommended that Santee Cooper ensure that project records contain accurate, legible records of the as-built features of all CCW impoundment outlet works, as well as information on abandoned works and how they were abandoned.”

Comment –

Santee Cooper has accurate, legible records of the as-built features for all the CCR impoundment outlet works. Copies of drawings 3-CV-555 and 3-C-591 which contain this information were retrieved and are attached for your review.

Santee Cooper will review our records pertaining to abandoned outlet works and how they were abandoned. Based on these findings we will determine what, if any, additional information is warranted. Santee Cooper will continue to document and maintain records of all modifications to any of the CCR impoundment outlet works or dikes for future reference.

5. Recommendations Regarding the Field Observations

- a. Page 1-7, Section 1.2.5 -

“Ash Pond A and Ash Pond B Dikes - Perform investigations and any needed repairs as recommended in Subsection 1.2.1 ...” with respect to the two pipe penetrations.

Comment –

Please see comment to recommendations provided in 1.c. above.

6. Recommendations Regarding the Maintenance and Methods of Operation

- a. Page 1-8, Section 1.2.6 -

“Maintain or repair active and abandoned pipe penetrations through the Ash Pond A/Ash Pond B perimeter dike and the South Ash Pond perimeter dike as recommended above in Subsection 1.2.1.”

Comment –

Please see comment to recommendations provided in 1.c. above.

- b. Page 1-8, Section 1.2.6 –

“It is recommended that bare soil areas on the dikes, particularly the South Ash Pond perimeter dike, be reseeded or otherwise protected against erosion as part of routine maintenance.”

Comment –

All CCR impoundment dikes are inspected quarterly and routine maintenance, including vegetation enhancements, are completed as appropriate. Reseeding of the bare soil areas on the South Ash Pond perimeter dike was completed on August 24, 2010 by Santee Cooper personnel and a protective grass cover has been established.

- c. Page 1-8, Section 1.2.6 –

“No recommendations regarding operational procedures appear to be warranted at this time, but ensure that pumping operations at the West Ash Basin, Unit 3 & 4 Slurry Pond, and Unit 2 Slurry Pond are closely monitored and have back-up pumps in reserve that can be quickly placed into service, if needed.

Comment –

Santee Cooper operations staff performs routine inspections of the pumping operations at least once per shift. Spare pumps are available in the fleet used to perform the inspections and a contract is in place with a qualified vendor to provide additional pumps and technical support on a 24-hour basis in the event they are needed.

7. Recommendations Regarding the Surveillance and Monitoring Program

- a. Page 1-8, Section 1.2.7 -

“It is recommended that all the CCW impoundment dikes be walked at least once per year, with close scrutiny in critical outside toe areas, such as at penetrations (conduits, including abandoned ones) or areas of known seepage or wet areas to check for changed conditions. These conditions cannot be viewed properly from the crest.”

Comment –

Currently, Santee Cooper CCR impoundment dikes are inspected quarterly, as noted by Dewberry & Davis, LLC in the body of the draft report. These inspections include proper inspection of the upstream and downstream slopes and all structures, including penetrations. Santee Cooper utilizes the standard inspection procedures outlined in the National Dam Safety Program, Training Aids for Dam Safety.

b. Page 1.8, Section 1.2.7 –

“It is recommended that the principal outlet structures, which are those located at Ash Pond B and the South Ash Pond, be inspected internally with a remote camera on a frequency of at least once every 5 years.”

Comment –

Remote camera inspections on a five year frequency are not warranted. As discussed in our response to recommendation 1, Santee Cooper is evaluating options for addressing the principal outlet structure at Ash Pond B. Regardless of which solution is adopted, sound construction methods and durable materials (HDPE) will be used. Furthermore, sound construction methods and materials (RCP) were used at the principal outlet structure at the South Ash Pond and no problems have been identified at this structure.

Santee Cooper contends that routine and periodic inspections, sound construction methods and materials (RCP) utilized during original construction, and good operational history for both of these structures is adequate. Based on this information it is not necessary to perform a camera inspection of the principle outlet structures at Ash Pond B and the South Ash Pond. However, if something is observed during a quarterly inspection that warrants more detailed evaluation, Santee Cooper will consider a camera inspection at that time.

Comments to Consultant’s Impoundment NID Hazard Potential Ratings:

1. Ash Pond A – Santee Cooper agrees with the Dewberry & Davis assessment.
2. Ash Pond B – Santee Cooper agrees with the Dewberry & Davis assessment.
3. South Ash Pond – This impoundment is classified as very small in height with intermediate storage and is approximately 50% full with nearly all of the freestanding water along the eastern end near the outfall structure where the greatest potential would be to disrupt the coal deliveries to the station. A final condition rating should be postponed until additional work is completed to more accurately assess the hazard potential.
4. West Ash Pond – This impoundment is classified as small in height with intermediate storage. It is approximately 90% full and no longer receives sluiced CCR, as such

- there is a limited amount of free water. A final condition rating should be postponed until additional work is completed to more accurately assess the hazard potential.
5. Slurry Pond 2 – This impoundment is classified as very small in height with small storage and is approximately 65% full. All potential impacts are low based on the fact that this impoundment does not received wet sluiced material, it is maintained in a dewatered condition, has less than 12 feet of head, and any flow from a potential failure would be limited to a very small area horizontally. Based on these factors, a low hazard potential rating is appropriate for Slurry Pond 2 and requests the consultant reassess the significant hazard potential rating.
 6. Slurry Pond 3 & 4 – This impoundment is classified as small in height with intermediate storage. A final condition rating should be postponed until additional work is completed to more accurately assess the hazard potential.

Comments to Consultant's Impoundment Condition Ratings:

The Dewberry & Davis draft report did not outline the criteria used to complete the condition ratings; however, the GEI Consultants, Inc. draft report for Grainger Generating Station included the criteria used to rate the condition of the CCR impoundments. The parameters are broad and do not specifically apply to the CCR impoundments found at Winyah Generating Station. In addition, the criteria heavily consider engineering analysis of the CCR impoundments that were not previously required by Federal or State Regulation or as standard engineering practice at the time of original design. As previously mentioned, CCR impoundments owned and operated by Santee Cooper are not regulated by Federal and/or State dam safety standards. That being said, every CCR impoundment has been designed by a Professional Engineer using methods accepted by the Practice at that time. Furthermore, given the very small to small height classification, generally low consequences of failure, the overall good condition of the basins and embankments, CCR consolidation, and exceptional performance record, Santee Cooper does not agree with the condition ratings found in the draft report by Dewberry & Davis. A revised condition rating for each impoundment and justification is provided as follows:

1. Ash Pond A – As summarized in the Dewberry & Davis draft report, this impoundment is a very low head structure (maximum 24.5' height) with small storage potential (807 acre-feet). It is well maintained with a low hazard potential and due to its age and operational characteristics most of the material in this impoundment is consolidated. In addition, there are no safety deficiencies and acceptable performance is expected under all applicable loading conditions. Based on this information, the condition rating should be changed from "Fair" to "Satisfactory".
2. Ash Pond B - As summarized in the Dewberry & Davis draft report, this impoundment is a low head structure (maximum 31' height) with small storage potential (537 acre-feet). It is well maintained with a low hazard potential and there are no safety deficiencies. Therefore acceptable performance is expected under all applicable loading conditions and the condition rating should be changed from "Fair" to "Satisfactory".

3. South Ash Pond - As summarized in the Dewberry & Davis draft report, this impoundment is a very low head structure (maximum 22' height) with intermediate storage potential (1129 acre-feet). As previously discussed, the CMP construction drain was properly sealed with a cutoff wall in March 2008 and Santee Cooper has included additional documentation with this submittal confirming adequate static stability. Seismic stability and liquefaction potential analyses of these dikes is not a critical need at this time, this impoundment is well maintained, the basin and embankment are in good condition, there are no safety deficiencies, and given the low height and generally low consequences of failure, the condition rating should be changed from "Poor" to "Satisfactory".
4. West Ash Pond - As summarized in the Dewberry & Davis draft report, this impoundment is a low head structure (maximum 22' height) with intermediate storage potential (1178 acre-feet). As previously discussed, the CMP construction drain was properly sealed with a cutoff wall in March 2008 and Santee Cooper has included additional documentation with this submittal confirming adequate static stability. Given the low height and generally low consequences of failure, the generally good condition of the basins and embankments, CCR consolidation, and exceptional performance record, there are no critical studies required at this time. In addition, there are no safety deficiencies and no critical studies required at this time. Based on this information, the condition rating should be changed from "Poor" to "Satisfactory".
5. Unit 3 & 4 Slurry Pond - As summarized in the Dewberry & Davis draft report, this impoundment is a low head structure (maximum 30' height) with intermediate storage potential (1700 acre-feet). As previously discussed, the CMP construction drain was properly sealed with a cutoff wall in March 2008 and Santee Cooper has included additional documentation with this submittal confirming adequate static stability and an assessment of the foundation materials. Although only 30% of the storage volume is estimated to contain free water Santee Cooper will evaluate the need to assess the seismic stability and liquefaction potential at the Unit 3 & 4 Slurry Pond. Given the low height, generally good condition of the basins and embankments, and no critical investigations are needed to identify potential dike safety deficiencies, the condition rating should be changed from "Poor" to "Satisfactory".
6. Unit 2 Slurry Pond - As summarized in the Dewberry & Davis draft report, this impoundment is a very low head structure (maximum 12' height) with small storage potential (416 acre-feet) and is approximately 65% full. CCR is not wet sluiced to this impoundment and stormwater is continually collected and pumps out to maintain a dewatered state. The CCR is consolidated, it has an exceptional maintenance record and it is well maintained, and there are no critical studies required at this time; therefore, the condition rating should be changed from "Fair" to "Satisfactory".