US ERA ARCHIVE DOCUMENT

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## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 11, 2011

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

Re:

Response to EPA Dam Safety Assessment Report for Dominion Power's Kincaid

Generation

Dear Mr. Hoffman:

Thank you for providing the opportunity to respond to the Dam Safety Assessment of CCW Impoundments for Dominion's Kincaid Generation, LLC power station. Our response is 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 and maintain the impoundments. 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

Enclosures: Attachment A

## ATTACHMENT A - Response for Kincaid Generation, LLC

Urgent Action Items: None recommended

## Long Term Improvements:

- 1. South Embankment Western Portion: The observed area of slope erosion on the western portion of the south embankment was repaired as of October 19, 2010. The slopes will continue to be inspected and any significant slope erosion will be repaired as necessary.
- 2. Rip-Rap Reinforcement Project: The rip-rap reinforcement project was completed as of November 17, 2010.
- 3. Stump Removal, Regrading and Vegetation Establishment: Stump removal and regrading activities were completed as of October 18, 2010. Reseeding of the repaired areas was conducted in the first two weeks of December 2010. The facility has a program in place to manage the establishment and maintenance of vegetation.
- 4. Record Drawings of Work Conducted: Records documenting the work that was conducted are maintained at the facility.

## Monitoring and Future Inspection:

- 1. Weekly inspection of the downstream slope at the junction where the north portion of the southwestern embankment meets the western embankment is conducted to monitor erosion. This area will be maintained and repaired as needed.
- 2. The facility continues to conduct weekly inspections and annual third party inspections.
- 3. The facility has an established program, which it will continue to conduct, for regular mowing and active vegetation management.