

US EPA ARCHIVE DOCUMENT

## Comments

EPA:

Explain in the beginning of the report which units will be assessed. The reasoning behind not assessing the Blowdown Canal needs to be made up front.

Table 2.1, Page 6: No height listed for 1-Series impoundments or Blowdown Canal. Why? Page 4 provides heights for the 1-Series impoundments.

Page 13 Section 4.5: What is the hazard potential rating of the Blowdown Canal? Make this explicit.

Appendix A, Checklists: Need separate checklists for each impoundment, or improve clarity of existing checklist. The hazard rating of "significant" for all ponds is not consistent with what was stated in the report.

Unclear what kind of liner the units with liners have, clay?

State: None

Company: See letter dated February 22, 2011

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



A DIVISION OF PACIFICORP

**DAVE JOHNSTON STEAM ELECTRIC PLANT**

1591 TANK FARM ROAD • GLENROCK, WYOMING 82637 • PHONE (307) 995-5000 • FAX (307) 995-5020

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 Dave Johnston 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, Dave Johnston Power Station. The site assessment was conducted on October 27, 2010, by Environmental Protection Agency (EPA) representatives and GEI Consultants to evaluate the safety of coal combustion waste impoundments at the plant.

The attached comments constitute PacifiCorp's response to the content of the draft report.

In March, 2009, prior to EPA's site assessment, PacifiCorp contracted with a firm specializing in dams and complex geotechnical studies to do an evaluation of the coal combustion waste impoundments at the Dave Johnston plant. 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 has implemented comprehensive operation and inspection procedures as a result of the geotechnical studies completed in 2009. Additionally, PacifiCorp will evaluate the recommendations provided by EPA's report and apply corrective measures as needed. PacifiCorp is committed to responsible environmental stewardship and safety at each of its facilities.

If you require further clarification of the information contained in the attached document, please contact Brett Shakespear at (801) 220-2575, or via email at [Brett.Shakespear@PacifiCorp.com](mailto:Brett.Shakespear@PacifiCorp.com).

Sincerely,

A handwritten signature in blue ink that reads "Rick Tripp".

Rick Tripp  
Managing Director, Dave Johnston Plant

Enclosure

## PacifiCorp Response to Draft Report

### 2.1 General

The report states the plant is located in Campbell County, Wyoming.

**PacifiCorp Response:** The Dave Johnston Plant is located in Converse County, Wyoming.

The report states that the 1A Ash Pond is being filled with fly ash and imported fill.

**PacifiCorp Response:** Bottom ash is also being used as fill.

### 2.4 Intakes and Outlet Works

The Dave Johnston NPDES Permit is listed as “NPDES Permit No. WY30003115”.

**PacifiCorp Response:** The Dave Johnston NPDES Permit number is WY0003115.

### 5.0 Hydrology and Hydraulics

The report uses a 50 percent probable maximum precipitation (PMP) figure of 16.7 inches in a 72-hour period. This PMP figure is used throughout Section 5 of the report to calculate the inflow design flood (IDF) for coal combustion waste impoundments at the plant. Additionally, recommendation #3 of Section 11.1 refers to the IDF calculated using a PMP of 16.7.

**PacifiCorp Response:** PacifiCorp considers 16.7 inches of precipitation in a 72-hour period to be an overly conservative number for use in calculating IDF for the coal combustion waste impoundments at the plant. 16.7 inches of precipitation is greater than the average amount of precipitation the plant location receives in a one year period.

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

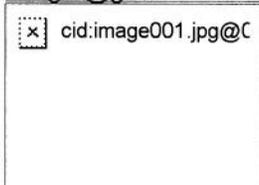
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