

US EPA ARCHIVE DOCUMENT

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Date: 01/14/2010 09:40 AM
Subject: Progress Energy Carolinas, Inc. Roxboro Plant

Good Morning Mr. Hoffman. The following presents the recommendations from the EPA contractor Paul C. Rizzo Associates, Inc. and the responses from Progress Energy Carolinas, Inc. (PEC). All are in regard to our Roxboro Plant. Please let me know if you have any questions.

4.1 RECOMMENDATION NO. 1

Inspect the slopes of the West Ash Pond Dam at the interface of the earth slope and the top of the riprap blanket for surface erosion or scarps.

Schedule: Following vegetative maintenance mowing.

PEC Response: *PEC will conduct these inspections as part of our routine inspection program.*

4.2 RECOMMENDATION NO. 2

Check the drain outlets of the West Ash Storage Dam during monthly inspections to determine if soil material is being transported.

Schedule: During Monthly Inspections.

PEC Response: *PEC assumes the term "West Ash Storage Dam" means the same as the "West Ash Pond Dam." PEC will conduct these inspections as part of our routine inspection program. PEC contracted with a consulting firm to evaluate the drain outlet and observe the areas of concern. The engineering consultants indicated they saw no indication that the material from the dam was being transferred through or around the drain outlets.*

4.3 RECOMMENDATION NO. 3

A method to quantify the amount of seepage from the West Ash Pond Dam internal drain outlets is recommended.

Schedule: Prior to Next Inspection.

PEC Response: *Within two months PEC will establish a technique for estimating the amount of seepage.*

4.4 RECOMMENDATION NO. 4

Continue to monitor the seepage at the toe of the Settling Pond Dike until the pond is taken out of service for repairs.

Schedule: According to existing plans.

PEC Response: *PEC will continue this monitoring.*

4.5 RECOMMENDATION NO. 5

Follow-up to developing and implementing a repair plan for the seepage at the NPDES Discharge Point.

Schedule: Prior to Next Inspection.

PEC Response: *PEC is currently developing a repair plan and will proceed once the plan is developed.*

4.6 RECOMMENDATION NO. 6

Since the 1987 Ash Pond Hydrology Study was completed, portions of the pond have filled with ash and three diked structures have been or will be constructed within the ash pond. The details of the Study were not available to determine if these changes were predicted in the 1987 Study. We recommend that PGN review this Study to determine if the results are still valid.

Schedule: Prior to Next 5-year Inspection.

PEC Response: *PEC will review the Study prior to the next five year inspection to determine if the Study results are still valid in regard to the three structures.*

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