

US EPA ARCHIVE DOCUMENT

Comments on Alabama Power's Gaston Power Station Draft Report

EPA: None

State: None

Company: See letter dated October 29, 2010



October 29, 2010

VIA OVERNIGHT DELIVERY

Mr. Stephen Hoffman
U.S. Environmental Protection Agency
2733 South Crystal Drive
Fifth Floor, N-5237
Arlington, Virginia 22202

Re: Draft Dam Safety Inspection Report for Plant Gaston

Dear Mr. Hoffman:

On September 30, 2010, the U.S. Environmental Protection Agency ("EPA") provided to Alabama Power Company ("APC") a draft report regarding certain facilities for the management of coal combustion byproducts at APC's Plant Gaston ("Draft Report"). The Draft Report was prepared by Dewberry & Davis, LLC ("Dewberry"), and was dated July 2010. This letter provides the comments of APC.

APC is generally satisfied with the content and conclusions of the Draft Report. The report concludes that the units inspected are in "satisfactory" condition, which is the most favorable category. We also understand the potential hazard rating to be based exclusively on the consequences of a failure of a structure, not the likelihood of such an event.

The Draft Report also includes several recommendations regarding minor maintenance and inspection items. APC concurs in the recommendations. Matters pertaining to repair of minor sloughing or erosion conditions, vegetation controls, and surveillance are consistent with APC's existing practices and procedures. APC will continue to identify maintenance items as they arise through regular inspections and address them promptly.

The report recommends a review of so-called "green wall" plantings at the crest on the west embankment. APC has reviewed this issue and concluded that the plantings in question serve a useful role. APC has removed larger trees and woody structures that have developed in this area, particularly those located further down the embankment slope. However, the vegetation located at the crest of the embankment is well above the phreatic surface in this area of the disposal facility and includes species with shallow root systems, such as Bradford pears and mimosa trees. Vegetation of this nature is not expected to impede or adversely affect the structural integrity of the embankment in the

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event of toppling by wind or other forces. Further, Bradford pears are known to split at the trunk when subjected to high winds, rather than topple (which could pull out the root system). It is our opinion that the benefits of the plantings are substantial with little or no risk to structural integrity. Accordingly, in APC's judgment, it is appropriate to maintain the vegetation in place.

In addition, APC provides the following comments on various discrete issues. On page 2-2, last sentence, the quoted material probably should read "significant hazard potential." On page 4-2, section 4.2.3, the reference to appendix document 19 may not be correct. On page 5-1, the date of the inspection should read "June 23, 2010." On page 5-2, section 5.2.1, the reference to appendix document 9 probably should refer to appendix document 15. The reference to figure 5.2.3-1 on page 5-7 should refer instead to figure 5.2.3-4. On page 6-1, it is correct as stated in section 6.1.3 that no spillway hydraulic data was provided; however, spillway analysis is unnecessary because storage capacity is sufficient to handle a 100 year, 24-hour rain event, as the report observes in section 6.1.2. On page 8-1, the report refers to the overflow outlet structure as "unregulated." We assume that refers to the physical structure. However, that description is misleading in that discharges from the outlet structure are permitted under the National Pollutant Discharge Elimination System, Permit No. AL 0003140. On page 9-1, "biannual" can mean either twice per year or every other year; we would recommend the unambiguous term "biennial."

Thank you for this opportunity to comment. Please direct any future correspondence on this issue to me.

Sincerely,



Matthew W. Bowden
Vice President
Environmental Affairs