

US EPA ARCHIVE DOCUMENT

Comments on Alabama Power Greene County Station Draft Report

EPA:

None

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 Greene County

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 Greene County (“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 operations items. The recommendations are consistent with APC’s existing practices and procedures to monitor, identify, and respond to maintenance issues. APC concurs in the recommendations. APC will continue to identify maintenance items as they arise through regular inspections and address them promptly.

In addition, APC provides the following comments on various discrete issues. On page iii, second full paragraph, last sentence, the name of the facility should be corrected. The “unprotected bare earth interior slope of the east dike” referenced on page 5-1-2 had been recently graded at the conclusion of improvements to that part of the facility. APC is following standard procedure to establish grass there, as is typical upon completion of a project of that nature. We continue to monitor that area to ensure the grass establishes as intended and expected. Photograph 5.3.4-2 depicts emergency stockpiles of various graded materials to be used in the event of an emergency repair, i.e., not just riprap.

October 29, 2010
Page 2

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

Sincerely,

A handwritten signature in blue ink that reads "Matthew W. Bowden". The signature is written in a cursive style with a prominent initial 'M'.

Matthew W. Bowden
Vice President
Environmental Affairs