

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on Alabama Power, James H. Miller Power Station, Quinton, AL
Round 9 Draft Assessment Report

To: File

From: Jana Englander, OSWER, US EPA

Date: June 14, 2011

1. On table of contents page, for Appendix B, switch documents around. Main Dike should be first (as it appears in actual appendix).
2. On p.5-11, in section 5.4.2 first line, correct typo - change "conditions" to "condition."
3. On p. 7-3, in section 7.1.6, first line, correct typo - change "Miler" to "Miller."
4. On p. 9-1, correct typo in section 9.3.1 - replace "/" with a period.
5. On p. 142 insert a page identifying Appendix B. Observation check list p.1, identify unit name.

June 3, 2011

VIA OVERNIGHT DELIVERY AND E-MAIL

**HOFFMAN.STEPHEN@EPA.GOV,
KOHLER.JAMES@EPA.GOV, AND
ENGLANDER.JANA@EPA.GOV**

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

Re: Draft Safety Inspection Report for Plant Miller

Dear Mr. Hoffman:

On May 5, 2011, 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 Miller (“Draft Report”). The Draft Report was prepared by Dewberry & Davis, LLC (“Dewberry”), and dated April 2011. 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 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. In addition, the Draft Report finds that “[n]o recommendations appear warranted at this time.” APC appreciates this confirmation of the adequacy of existing structures and procedures at Plant Miller.

APC provides the following comments on various discrete issues. On page vi, in the table of contents, the date of the document listed as Appendix A, Doc. 11, should be changed from November 1, 2010 to November 11, 2010. On page 4-1, Section 4.1.1, a period is lacking for the last sentence. On page 5-8, Section 5.3.3, first paragraph, first sentence, the word “dike” should appear immediately after the word “saddle.” On page 5-8, Section 5.3.3, first paragraph, last sentence, the phrase “main dam” should be replaced with “saddle dike.” On page 5-8, Section 5.3.3, second paragraph, first sentence, the word

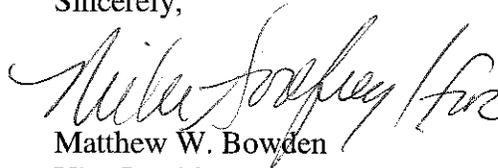
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“dike” should appear immediately after the word “saddle.” On page 6-1, it is correct as stated in Section 6.1.3 that no spillway hydraulic data was provided; however, spillway analysis is unnecessary because storage capacity is sufficient to handle a 100 year, 24-hour rain event, as the report observes in Section 6.1.2. On page 9-1, a period is lacking for the single sentence in Section 9.3.1.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Bowden for".

Matthew W. Bowden
Vice President
Environmental Affairs