

US EPA ARCHIVE DOCUMENT

MEMORANDUM

SUBJECT: EPA Comments on "Assessment of Dam Safety of Coal Combustion Surface Impoundments: Crisp County Power Commission, Crisp Plant, Warwick, Georgia"

DATE: August 22, 2013

1. In Section 1.1 "Introduction," first paragraph, end of fourth line, replace "a" with "an". Same section, second paragraph, second line, replace "site a assessment" with "a site assessment".
2. On page 1-2, Section 1.3.1.6, please change the font of the text of this subsection to match that of the rest of the report.
3. In section 2.1 "Location and General Description," it would be advantageous to provide the source of the dimensions provided in Table 1 "Summary of the Ash Pond Approximate Dimensions and Size."
4. In section 2.2 "Coal Combustion Residue Handling," it would be advantageous to describe specifically what CCR waste streams are generated and managed by the impoundments (boiler slag, bottom ash, fly ash, and flue gas desulphurization gypsum). Additionally, any CCR waste streams generated at the facility and their subsequent management should be identified.
5. On page 2-3, Section 2.4, first line, replace "assessments" with "assessment". Third line, replace "receive" with "receives".
6. In section 4.2.1 "Original Operating Procedures," it would be advantageous to be more specific regarding "Plant runoff" i.e., stormwater runoff.
7. On page 5-2, Section 5.2, second line, replace "cover" with "covered".
8. Section 5.2, indicates that standing water is seen near the northwest corner of the pond. Is this a point of concern? What is the source of the standing water?
9. In section 6 "Hydrologic/Hydraulic Safety," it may be advantageous to provide any description of known contributory area to the pond for run-on from stormwater.
10. In section 6.3 "Assessment of Hydrologic/Hydraulic Safety," the statement regarding EPA requirements for a POOR rated facility is inaccurate. Lack of hydrologic analysis, alone, does not automatically warrant a POOR rating. Please remove the statement.
11. On page 7-2, section 7.3, please change the font for the first bullet to match the rest of the text in this section.
12. In section 7.3 "Assessment of Structural Stability," the basis for giving a FAIR rating should be changed as it is currently confusing. The report currently details that the unit would receive a FAIR rating under the following conditions, yet then lists the deficiencies with the unit that would typically merit a POOR rating. It may be changed to indicate that remedying the deficiencies may lead to at least a FAIR rating.
13. Sections 8.3.1 and 8.3.2, please replace "poor" with "inadequate". Neither subsections can be considered adequate without written records.
14. In Appendix B, a response to the following three questions was not included in the checklist sheets for each of the impoundments, please add to the report:
 - o Concerning the embankment foundation, was the embankment construction built over wet ash, slag, or other unsuitable materials? If there is no information just note that.
 - o Did the dam assessor meet with, or have documentation from, the design Engineer-of-Record concerning the foundation preparation?

- From the site visit or from photographic documentation, was there evidence of prior releases, failures, or patchwork on the dikes?

DATE: January 30, 2014

1. On page 2-1, in section 2.1.1 “Horizontal and Vertical Datum” Please correct the grammar errors in the second sentence: “is assumed...”.
2. In section 4.1.1, at the end of the third paragraph, the draft report states that the crest width generally varies from about 10 to 20 feet. However, the final report states that the crest width generally varies from about 15 to 20 feet. There was no comment on this from either EPA or the utility. Where does this change come from?
3. Why is Table 6-1 illustrating Design Flood requirements for Category 1 Dams when according to the second paragraph of section 6.1, the Ash Pond is classified as a Category II dam. Table 6-1 should be providing requirements for Category II Dams.
4. Table 7-1 in section 7.1.1 indicates that the Minimum FOS for Seismic Loading conditions that this program has maintained is 1.0, not 1.1. Please correct.
5. Section 9.3.2, please indicate whether or not the Instrumentation Monitoring Program is adequate.
6. Please add the memorandum of explanation of comment incorporation as an appendix to the final report. (Make sure it just applies to the Crisp Plant).

From: [Woosley, Tom](#)
To: [Englander, Jana](#)
Subject: RE: Comment Request on Coal Ash Site Assessment Round 12 Draft Report - Crisp County Power - Crisp Power Plant
Date: Monday, September 30, 2013 3:41:36 PM

The Georgia Safe Dams Program will not have comments.

From: Englander, Jana [mailto:Englander.Jana@epa.gov]
Sent: Monday, September 30, 2013 3:35 PM
To: Pallas, Jeff; Woosley, Tom
Cc: Hoffman, Stephen; Dufficy, Craig; Kelly, PatrickM; Englander, Jana
Subject: FW: Comment Request on Coal Ash Site Assessment Round 12 Draft Report – Crisp County Power - Crisp Power Plant

Dear All,

We would like to offer Georgia and EPA Region 4 an opportunity to comment on the Draft Assessment Report on the Coal Combustion Residual Impoundment(s) located at the facility below. You can access the report by following the link below. Please let me know if you intend to comment or have any questions. Comments would be appreciated within 30 calendar days of receipt of this email. Thank you!
Regards,

Jana

Jana Englander
Office of Resource Conservation and Recovery,
Materials Recovery Waste Management Division
Energy Recovery and Waste Disposal Branch
U.S. Environmental Protection Agency
703-308-8711

From: Englander, Jana
Sent: Monday, September 30, 2013 3:10 PM
To: 'srentfrow@crispcountypower.com'
Cc: Hoffman, Stephen; Dufficy, Craig; Kelly, PatrickM; Englander, Jana
Subject: Comment Request on Coal Ash Site Assessment Round 12 Draft Report – Crisp County Power - Crisp Power Plant

Dear Mr. Rentfrow,

The draft assessment report for Crisp County Power - Crisp Power Plant is ready for review. EPA would appreciate it if you would review and submit your comments on this report to us within 30 calendar days of receipt of this email. **Please confirm receipt of this email and send your comments to:**

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

If you are using overnight of hand delivery mail, please use the following address:

Mr. Stephen Hoffman
US Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive
5th Floor, N-5237
Arlington, VA 22202-2733

You may also provide your comments by e-mail to hoffman.stephen@epa.gov and englander.jana@epa.gov.

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as “confidential” you must so advise EPA when you submit your response.

The draft report can be accessed at the secured link below. The secured link will expire on November 15, 2013.

Here is the link for the report:

<http://www.hightail.com/download/OGhkeFVSZ1BvOnQzZU1UQw>

Please let me know if you have trouble accessing the reports or have any questions/requests.

Respectfully,

Jana Englander

Jana Englander
Office of Resource Conservation and Recovery,
Materials Recovery Waste Management Division
Energy Recovery and Waste Disposal Branch
U.S. Environmental Protection Agency
703-308-8711

From: [Steve Rentfrow](#)
To: [Englander, Jana](#)
Cc: [Gene Ford](#)
Subject: RE: Comment Request on Coal Ash Site Assessment Round 12 Draft Report – Crisp County Power - Crisp Power Plant
Date: Thursday, November 14, 2013 10:21:46 AM

My apologies

Yes we did receive the draft report

The only comments we have are:

- In section 2.4 you state that the flow going into the pond include cooling tower blowdown. We have no cooling towers
- The recommendations include preparing detailed drawings and performing hydraulic and seismic studies. Considering the low level of ash in the pond and the minimal amounts being added we consider a requirement to perform these actions unnecessarily expensive.

We look forward to working with you on this project.

Steve Rentfrow
General Manager
Crisp County Power Commission
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