

US EPA ARCHIVE DOCUMENT

Comments Duke Energy Lee Steam Station Draft Report

EPA:

The appendix cover pages do not appear to be preceding the proper section (they are all grouped together).

State: None

Company: See letter dated October 29, 2010



DUKE ENERGY CORPORATION
526 South Church Street
Charlotte, NC 28202

Mailing Address:
P.O. Box 1006
Charlotte, NC 28201

Via E-Mail and Overnight Courier

October 29, 2010

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

Re: Comments on Draft Dike Inspection Report
Lee Steam Station
Williamston, South Carolina

Dear Mr. Hoffman,

Duke Energy Carolinas, LLC (DEC) received and has reviewed the draft report for Lee Steam Station that resulted from the site assessment of the Ash Pond conducted by the US EPA and its engineering contractors on June 22, 2010. Duke Energy supports the EPA's objective to ensure ash basin dam safety. We have a comprehensive and robust monitoring, maintenance, and inspection program in place for all of our coal ash basin dams, and we remain committed to operating and maintaining these facilities safely.

Currently, the impoundment facilities at Lee are under the regulatory authority of the South Carolina Department of Health and Environmental Control (SCDHEC), Division of Water, Dam and Reservoirs Safety Programs.

Duke Energy remains committed to meeting all state and federal requirements and to managing its coal combustion byproducts impoundments in a very safe and responsible manner. We are confident, based on our ongoing monitoring, maintenance and inspections, that each of our ash basin dams has the structural integrity necessary to protect the public and the environment. EPA's report on Lee's facilities supports this conclusion and found that acceptable performance is expected in accordance with the applicable safety regulatory criteria.

Comments and factual corrections to the report are as follows:

Report:

The acronym CCW (Coal Combustion Waste) can be confusing to some industry professionals because it can also mean Condenser Circulating Water. Currently the EPA is using CCR (Coal Combustion Residuals) as the terminology for coal combustion byproducts. The CCW acronym used in the report should be changed to CCR to provide consistency with the current EPA terminology.

1.7 Prior Inspection

On page 2 of the report, the consultant stated:

"The embankment dams for the CCW impoundments at Lee Steam Station are inspected monthly by DEC Lee Steam Station personnel, but no written records of the inspections are maintained."

Past inspection records were shared with the consultant at the time of the inspection. There is a program in place to maintain the monthly and annual inspection records. Personnel at Lee Steam Station inspect the dams monthly and fill out an inspection checklist. During the monthly inspection, the qualified inspector observes the embankments for any problem areas, including areas previously identified during inspections performed by independent engineering consultants. Records of monthly and annual inspections are maintained at the station and at the central corporate office.

2.4 Intakes and Outlet Works

On page 4 of the report, the consultant stated:

"One set of slots contains 6-inch stop logs and the other a full height steel panel. The boxes are connected to 36-inch reinforced concrete decant pipes that extend beneath the adjacent embankments. The pipes are surrounded by skimmers that extend down several feet to keep debris out. Flow through the pipes is controlled by manually adding or removing 6-inch wooden stop logs into the guides accessible from the outlet towers above."

The discharge tower being described above is correct except that the stop logs are 9 -12 inches in height and they are not made of wood but instead of concrete or metal.

2.7 Standard Operational Procedures

On page 5 of the report, the consultant stated:

"The channel is periodically dewatered, and solid CCW is excavated and hauled to a permitted landfill on the south side of DEC property."

The primary pond is periodically dewatered and the CCR is excavated to an onsite state-approved fill.

"The flow at the decant inlet is monitored continuously by an electric gauge at the weir, and the flow rate is recorded weekly."

Water from the Secondary Basin is not continuously monitored; it is instantaneously checked once per week and logged.

4.2 Primary Active Ash Pond

On page 8 of the report, the consultant stated:

"Structures present between the Primary Active Ash Pond dam and the Saluda River include the railroad tracks and embankment, a DEC-operated three-unit emergency generation nuclear plant, and several DEC warehouses. DEC personnel indicated that several people work in the nuclear plant downstream of the dam during the day. The plant is located in the eastern portion of the downstream area."

The statement, "DEC-operated three-unit emergency generation nuclear plant" is incorrect and must be corrected. The plant being described consists of three natural gas-powered Simple Cycle Combustion Turbine (CT) units that are used for electricity generation when demand is high. There is no nuclear power plant on site.

If you have any questions, please contact me at our corporate offices at 980-373-3719 or via e-mail at ed.sullivan@duke-energy.com.

Sincerely,

D. Edwin M. Sullivan

D. Edwin M. Sullivan, P.E.
Consulting Engineer
Environment, Health, & Safety