

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on Firstlight Power Resources, Inc. – Mt. Tom Generating Station, Holyoke, MA
Round 10 Draft Assessment Report

To: File

Date: April 25, 2012

1. Please provide the rationale for the decision not to assess the Equalization Tank in the text of the report, not just on the checklist sheet.
2. On p. ii, second paragraph, please remove the Equalization Tank from the "poor" rating discussion. Same comment for p. 10, section 2.1.1 General Findings. Same comment for Section 3.1 Assessments. Same comment for Section 4.0 Engineer's Certification. In addition, since the Equalization Tank was not provided with a condition rating, please remove recommendations attributed to just the Equalization Tank.
3. On p. 3, section 1.2.4, first paragraph, the first two sentences contradict each other with regard to an impoundment liner: "The Bottom Ash Basin A (Basin A) **is a lined earthen waste water basin** located approximately 1,500 feet south of the Mt. Tom power plant. Basin A was constructed in the 1980s **as an unlined basin**, and generally has a square shape." Please correct - you may wish to fold the second paragraph into paragraph one to avoid this confusion.
4. On p. 4, section 1.2.4, third paragraph under the Equalization Tank section, please provide the rationale for decision not to assess this unit.
5. On p. 4, Section "Equalization Tanks," "di minimus" should be changed to *de minimis*.
6. Although there appears to be a discussion in section 1.2 of the description of each unit and the materials in which each unit consists, it is requested that either in Appendix C- the checklist, or in section 1.2 there be a specific statement made to address the following question: "Is any part of the impoundment built over wet ash, slag, or other unsuitable materials (like TVA)?" Please correct for the two assessed impoundments.
7. On p. 10, section 2.1.2, and p. 12, section 2.1.4 - please refrain from using the term "Satisfactory condition" when these units were given a Poor condition rating. It only confuses the reader. Same comment for p. 11, section 2.1.3, with an unrated unit.
8. On p. 13, section 2.5 "Hydrologic/Hydraulic Data," it should be noted whether or not the analyses performed by GZA constitutes a formal assessment of the hydrologic and hydraulic capacity of the units at the facility. It is somewhat ambiguous from the text if a

formal review was available to the contractor. If not, this should be noted as a reason for the Poor ratings of the units in the subsequent assessment.

9. On p. 13, section 2.4 indicates that there is no EAP, section 3.3 ought to include the development of an EAP for actions related to potential hazards/failure from the impoundments.

RE: Comment Request on Coal Ash Site Assessment Round 10 Draft Report - First Light Power Resources' Mt. Tom Station

Gwyther, Mike to : Jana Englander, Burnham, Charles

Cc : Stephen Hoffman, James Kohler

Jana,

I apologize for not confirming receipt of your e-mail. We have no comment at this time.

Mike Gwyther
Plant Manager
Mt. Tom Generating Station

413-536-9562 office