

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 13, 2013

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL

Mr. Mike Gwyther, Manager
Mt Tom Station First Light and Power Resources
20 Church Street
Hartford, CT 06103

Re: Request for Action Plan regarding First Light Power Resources' – Mt. Tom Power Station

Dear Mr. Gwyther,

On May 23, 2011 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the First Light Power Resources' – Mt. Tom Power Station facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the First Light Power Resources' – Mt. Tom Power Station facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the First Light Power Resources' – Mt. Tom Power Station facility can be accessed at the secured link below. The secured link will expire in 60 days.

Here is the link: <http://www.yousendit.com/download/UVJqV293TXZiR0xtcXNUQw>

This report includes a specific condition rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the First Light Power Resources' – Mt. Tom Power Station facility. These recommendations are listed in Enclosure 1.

Since these recommendations relate to actions which could affect the structural stability of the CCR management unit(s) and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please provide a rationale. Please provide a response to this request by **April 15, 2013**. Please send your response to:

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

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

Mr. Stephen Hoffman
U.S. Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-5838
Arlington, VA 22202-2733

You may also provide a response by e-mail to hoffman.stephen@epa.gov, dufficy.craig@epa.gov, kelly.patrickm@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.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued efforts to ensure protection of human health and the environment.

Sincerely,
/Suzanne Rudzinski/, Director
Office of Resource Conservation and Recovery

Enclosure

Enclosure 1
**First Light Power Resources' – Mt. Tom Power Station Recommendations (from the
final assessment report)**

CONCLUSIONS

The following deficiencies were noted during the inspection:

Bottom Ash Basin A:

1. Small ruts and low areas and minor surficial erosion along the top of the berm/embankment;
2. Minor erosion at the top of the basin slope, with some transport of gravel into the basin through ripped and missing silt fence;
3. Staff gage numbers are worn and difficult to read near the water line;
4. Discharge pipe at Connecticut River inaccessible due to heavy vegetation growth;
5. Tree and brush growth along east 'downstream' embankment slope and brush growth along northwest and west 'downstream' embankment slopes;
6. No geotechnical or hydrologic/hydraulic computations were made available for review, thus, the stability of the embankments could not be independently verified; and
7. There is no known Emergency Action Plan (EAP) for Bottom Ash Basin A.

Special Basin:

1. Small ruts and low areas and minor surficial erosion along the top of the berm/embankment;
2. Minor erosion at the top of the basin slope, with some transport of gravel into the basin through ripped and missing silt fence;
3. Tree and brush growth along east 'downstream' embankment slope;
4. Minor brush growth and minor erosion on west 'downstream' embankment slope;
5. No geotechnical or hydrologic/hydraulic computations were made available for review, thus, the stability of the embankments could not be independently verified; and
6. There is no known Emergency Action Plan (EAP) for the Special Basin.

RECOMMENDATIONS

GZA recommends the following:

Studies and Analysis Recommendations:

1. Investigate and delineate the extent of embankment fill along the eastern (Connecticut River) side of the Bottom Ash Basin A and Special Basin, and evaluate the presence of trees and woody vegetation on the surface of the filled embankment slopes.
2. Perform a geotechnical stability analysis of the embankments and/or management units under all applicable loading conditions, including earthquake-induced loading.
3. Perform a hydrologic and hydraulic analysis of the Bottom Ash Basin A and Special Basin, including an analysis of outlet capacity and overtopping potential of the units.
4. Prepare an Emergency Action Plan (EAP) for the Bottom Ash Basin A and the Special Basin for actions related to potential hazards/failure of the impoundments.

Operation & Maintenance Recommendations:

1. Cut/mow vegetated embankment slopes regularly to prevent the growth of trees and woody vegetation;
2. Fill low areas and eroded areas along the top of the berms and access roads with compacted crushed stone;
3. Maintain a safe, clear path to all discharge locations along the Connecticut River;
4. Repair/replace staff gage markers as needed so that the water surface elevation in the basins and tank can be easily read from the top of berm/top of tank walkway. A distinct marking should be provided at the maximum operating level; and
5. Annually operate all gates, valves, and outlet structures through their full range of operation.

Minor Repair Recommendations:

1. Fill low/rutted areas on access roads around the Bottom Ash Basin A and Special Basin with appropriately sized and compacted stone;
2. Repair/fill areas of erosion on the surface of the berms and embankment slopes. New material should be appropriately sized to prevent erosion from surficial runoff;
3. Replace/repair silt fence along bottom of the perimeter chain-link fence at the Bottom Ash Basin A and Special Basin, or provide alternate means to prevent erosion and transport of stone into basins;
4. Based on the results of the embankment fill delineation recommended above, clear vegetation including trees (and associated roots/ root balls) from embankment fill slopes. Fill any voids resulting from root removal with compacted granular material. Establish healthy grass cover on slopes after vegetation removal is complete; and
5. Repair/replace Bottom Ash Basin A staff gage and provide a distinct marking for the maximum operating level.