

US EPA ARCHIVE DOCUMENT



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

April 20, 2011

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Mr. Jim Vick, Environmental Affairs Director
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Vick,

On July 6, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Lansing Smith 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 Lansing Smith 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 Lansing Smith facility is enclosed. This report includes a specific 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 Lansing Smith facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units 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 explain why. Please provide a response to this request by May 20, 2011. Please send your response to:

Mr. Stephen Hoffman
US 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
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-237
Arlington, VA 22202-2733

You may also provide a response by e-mail to hoffman.stephen@epa.gov

This request has been approved by the Office of Management and Budget under EPA ICR Number 2350.01.

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.

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 ongoing efforts to ensure protection of human health and the environment.

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

Enclosures

1.2.1 Recommendations Regarding the Structural Stability

An action plan should be developed to address surficial sloughing, rill erosion and sediment deposition along downstream slopes. Based on photographic documentation, the plan should consider changes in drainage patterns to direct runoff back inside the embankments. The draft report included the above recommendations; subsequently GPC has developed and provided a copy of a site specific "Ash Pond Maintenance Plan" that incorporates the recommendations.

1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety

The amount of freeboard needs to be verified. Per information provided by GPC, the freeboard is currently 2.5'. The available freeboard based on visual observations made during the site visit along portions of the dike system appears to be less than 1-ft.

1.2.3 Recommendations Regarding the Supporting Technical Documentation

None appear warranted at this time.

1.2.4 Recommendations Regarding the Description of the Management Unit(s)

None appear warranted at this time.

1.2.5 Recommendations Regarding the Field Observations

From the field observations the following issues were identified as needing to be addressed with routine maintenance:

- Surface sloughing has occurred in four areas along the northeast downstream slope of the embankment. One of those areas has been repaired with slush grouted rip-rap;
- There is evidence of small animal burrows along the downstream embankment;
- Widespread rill erosion, surface sloughing and sediment deposition has occurred along downstream slope; and
- Irregular road along west dike downstream buttress with rutting and small surface depressions holding water.

Subsequent to the time these initial recommendations were made, GPC has addressed these concerns, provided photo-documentation of the corrections, and prepared a site specific "Ash Pond Maintenance Plan" that incorporates these recommendations.

1.2.6 Recommendations Regarding the Maintenance and Methods of Operation

Vegetation should be cut or mowed on an as-needed basis to prevent the establishment of large woody-stemmed vegetation. In the draft report there was a recommendation to develop a plan of action to handle the maintenance of surficial sloughing, crest depression and rill erosion when observed. Subsequent to this recommendation, GPC prepared a site specific "Ash Pond Maintenance Plan" that incorporates these recommendations.

1.2.7 Recommendations Regarding the Surveillance and Monitoring Program

None appear warranted at this time.

1.2.8 Recommendations Regarding Continued Safe and Reliable Operation

The draft report contained the following recommendations concerning safe operation:

- Develop an action plan to address surficial sloughing along the downstream slopes.
- Perform remediation along downstream slopes to address surficial sloughing.
- Perform remediation along the slopes where erosion is occurring.
- Perform remediation along the crest where depressions are present.

Subsequently GPC addressed these concerns, photo-documented the corrections, and prepared a site specific “Ash Pond Maintenance Plan” that incorporates these recommendations.

- It is recommended that verification be made to ensure adequate freeboard (2.5-ft) exists along all points of the diked embankment system.