

US EPA ARCHIVE DOCUMENT

15 April 2013

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

ELECTRONIC SUBMISSION:
hoffman.stephen@epa.gov

**RE: Request for Action Plan
Lansing Board of Water & Light's Erickson Power Station**

Dear Mr. Hoffman,

This letter is in response to your March 13, 2013 Request for Action Plan regarding the coal combustion residual site assessment at the Lansing Board of Water & Light's Erickson Power Station on May 19, 2011.

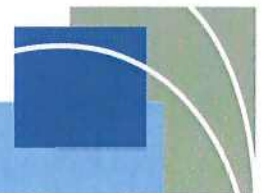
The BWL's plan to address the alleged deficiencies and recommendations outlined in Enclosure 1 of your March 13th correspondence is set forth below.

1. CONCLUSIONS

Conclusions 1, 2, 4, and 5. As noted in Enclosure 1, the BWL has already addressed the conditions and therefore considers the action plan complete for these items. Enclosed for ease of reference is a copy of the BWL's June 28, 2012 correspondence describing several actions taken at the impoundment following the EPA's May 2011 site assessment.

Conclusions 3, 7, 9, and 10. As noted in Enclosure 1, the BWL is designing a modification to the existing impoundment to include a small (less than 5 acres) surface impoundment within the existing 33 acre footprint. Construction of the small impoundment is expected to start October 2013, with operation of the new impoundment anticipated to commence in July 2014. The BWL has retained a professional engineer, Mayotte Design & Engineering, P.C., to design the new impoundment, and the design and construction will address all four Conclusions. Consequently, the BWL plans to address the issues described in Conclusions 3, 7, 9 and 10, on or before July 2014.

Conclusion 6. The BWL will install a fence to prevent animals from nesting in the emergency overflow pipe by August 31, 2013.



Conclusion 8. The unknown pipe found on the north side of the Ash Pond pipe will be evaluated as follows:

- The necessity of the pipe will be investigated and if deemed unnecessary it will be removed by December 31, 2013.
- If the pipe is necessary, the BWL will investigate the feasibility of re-locating the pipe outside the impoundment structure, and if it is practicable to do so the pipe will be relocated by May 2014.

2. RECOMMENDATIONS

Studies and Analyses. See response to Conclusions 3, 7, 9 and 10 above. Furthermore, the BWL does not intend to use the originally designed 33 acre impoundment as an ash storage area.

Operation & Maintenance Recommendations. As to 1, 4, 6, and 7, see response to Conclusions 1, 2, 4, and 5 above. Regarding 3, 5, and 8, see response to Conclusions 3, 7, 9, and 10 above. Lastly, our response to Conclusion 6 above also pertains to O&M Recommendation 2.

Repair Recommendations. As to 1, see response to Conclusions 3, 7, 9 and 10 above. Regarding 2, see response to Conclusion 8 above.

If you have any questions, concerns or require additional information, please feel free to contact me at (517) 702-6153, mwm@lbwl.com, or Ms. Cheryl Loudon at (517) 702-6396, cjl@lbwl.com.

Sincerely,



Mark Matus
Manager of Environmental Services
Lansing Board of Water & Light

Enclosures

CC: Ms. D. Allen
Mr. G. Stojic
Ms. B. Ekren
Ms. C. Loudon



28 June 2012

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

ELECTRONIC SUBMISSION
HOFFMAN.STEPHEN@EPA.GOV

**RE: Comment Request "Draft Round 10 Draft Report –
Lansing Board of Water & Light's Erickson Power Station Ash Pond"**

This correspondence is submitted in response to your May 29, 2012 request for comments regarding the "Draft Round 10 Dam Assessment Report – Lansing Board of Water & Light's Erickson Power Station Ash Pond" (Report.) The Lansing Board of Water & Light (BWL) appreciates this opportunity to comment and offers the following:

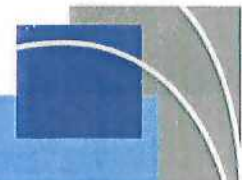
- The Report applies the undefined term "Ash Pond" to the Erickson Station facility instead of using the previously defined terms, "management unit" or "surface impoundment."
 - EPA referred to the temporary storage area as a "management unit" in its 2009 correspondence request for information under section 104(e) of Comprehensive Environmental Response, Compensation and Liability Act; and used the term "surface impoundment" in its 2010 "Questionnaire for the Steam Electric Power Generating Effluent Guidelines Survey" under Section 308 of the Clean Water Act.
- Section 1.2.2, Owner/Operator, erroneously states that the impoundment "... is owned and operated by E[rickson] S[tation], a wholly owned subsidiary of BWL."
 - Erickson is not a wholly owned subsidiary of the BWL. The BWL is the owner and operator of Erickson Station and Erickson Station is not a subsidiary of the BWL or any other entity.
- Section 1.2.3, Purpose of Ash Pond, states inaccurately that "An additional on-site pond, the Water Storage Pond, is used as a community fishery and is not part of the normal operations of the E[rickson] S[tation]."
 - In addition to using the Water Storage Pond as a fishery, Erickson also uses the pond as a source for cooling tower make up when water from the Grand River is too turbid for optimal cooling tower efficiency.



- Section 1.2.4, Description of the Ash Pond and Appurtenances and Section 1.2.7 Hazard Potential Classification, notes that "... as a result of the ash removal activities, the Ash Pond has been dewatered and there are no current plans to refill it." This statement is not entirely accurate.
 - There is no plan to store ash in the management unit after the Ash Excavation Project is complete, but the BWL is in the process of designing a small (less than five acres) surface impoundment within the existing 33 acre footprint of the management unit to manage wastewater, including decant water from the ash Hydro bins.
- Section 2.5, Hydrologic/Hydraulic Data, inaccurately states that "[d]uring normal operating conditions, there is approximately sixteen feet of freeboard."
 - The management unit operates within three feet of freeboard, not sixteen feet.

Since the May 19, 2011 inspection, BWL has addressed the following conditions identified as deficiencies, maintenance and repair recommendations in the Executive Summary of the Report.

- Presence of a brush pile on the southeast side of the outer slope. (#1, p.1)
- Several large stumps remaining on the interior and outer slopes. (#2, p 1)
- Presence of vegetation in the emergency overflow pipe. (#6, p 1)
 - The stumps, the brush pile on the outer slope as well as the vegetation in the emergency overflow pipe have all been removed.
- Leaking at the bottom ash discharge pipe. (#4, p. 1)
 - The general contractor for the Ash Excavation Project repaired the leaking discharge pipe shortly after the inspection.
- Repair the erosion and add erosion mitigation measures to prevent future erosion from occurring at the discharge end of the runoff pipe from the coal pile. (#7, p 3)
 - The general contractor for the Ash Excavation Project has repaired the erosion and installed rip-rap to prevent future erosion from the coal pile runoff.
- No formal inspection checklist to observe and document the structural conditions of the dike. (#5, p. 1)
 - At the time of the inspection there was a formal checklist in existence addressing visual structural conditions of the impoundment. Erickson's staff is conducting quarterly inspections using the checklist, and a copy of the checklist (revised in 2011) is attached.





Environmental Services Department

To the extent the balance of the noted deficiencies, maintenance and repair recommendations remain relevant after we finalize the use and design of the impoundment, the BWL will take any actions that may be necessary and appropriate to address the issues.

If you have any questions, concerns or require additional information regarding this application, please feel free to contact me at (517) 702-6153, mwm@lbwl.com, or Ms. Cheryl Louden at (517) 702-6396, cjl@lbwl.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Matus", is written over a faint, larger version of the same signature.

Mark Matus
Manager of Environmental Services
Lansing Board of Water and Light

CC: Mr. M. Williams
Mr. G. Stojic
Ms. B. Ekren
Ms. C. Louden

