

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on Lansing Board of Water & Light - Erickson Power Station,
Lansing, MI
Round 10 Draft Assessment Report

To: File
From: Jana Englander, OSWER, US EPA

Date: April 30, 2012

1. We have requested that the following question be answered for each pond, this is generally accompanied with the assessment check list sheets: "*Is any part of the impoundment built over wet ash, slag, or other unsuitable materials (like TVA)?*" Please address for the ash impoundment.

28 June 2012

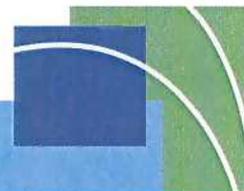
Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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:

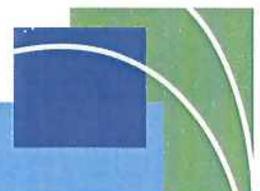
- The Report applies the undefined term "Ash Pond" to the Erickson Station facility instead of using the previously defined terms, "management unit" or "surface impoundment."
 - EPA referred to the temporary storage area as a "management unit" in its 2009 correspondence request for information under 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.



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 Loudon at (517) 702-6396, cjl@lbwl.com.

Sincerely,



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

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





Erickson Dam Inspection Checklist

DATE: _____ **TIME:** _____ **INSPECTOR:** _____

	Yes	No	Notes
Recent Precipitation Event?			Precipitation Estimate: _____ in
Does Water Level Appear Normal? (<= 100ft according to staff gauge on concrete pier weir southern face)			
Are the Earthen Embankments (slopes) free from excessive vegetative growth?			
Are the Earthen Embankments free from tree and shrub growth?			
Is there any new seepage or wet areas along the Earthen Embankments?			
Is there any significant erosion, sinkholes, sloughs, unusual settlement along the Earthen Embankments?			
Is there evidence of animal burrows?			
Are the stop logs in position & in good condition			

Observations/Comments: _____

Contact Info:

Dan Smith	Erickson Station Shift Supervisor	Erickson Station Control Room
702-6155 (Primary) 331-2793 (Cellular)	702-6301 (Primary)	702-6303 (Primary)

US EPA ARCHIVE DOCUMENT