

US EPA ARCHIVE DOCUMENT



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August 23, 2011

Delivered via E-Mail to
hoffman.stephen@epa.gov

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

Re: Responses to Recommendations in Final Coal Combustion Waste Impoundment
Round 7 - Dam Assessment Report for Louisa Generating Station

Dear Mr. Hoffman:

MidAmerican Energy Company ("MidAmerican") appreciates the opportunity to provide responses to the recommendations outlined in the Final Coal Combustion Waste Impoundment Round 7 - Dam Assessment Report for Louisa Generating Station. The specific recommendations were summarized in EPA's June 26, 2011 letter, Enclosure 2, submitted to MidAmerican's Ms. Cathy Woollums.

MidAmerican takes its environmental responsibilities very seriously. I therefore hope you find the responses complete and consistent with your expectations. However, if you have any questions or require any additional information, please don't hesitate to contact me.

Sincerely,

Kevin D. Dodson
Director – Environmental Programs,
Compliance and Permitting
Phone: 515-281-2692
kddodson@midamerican.com

Attachments

cc: Bill Whitney
Dave Ulozas
Cathy Woollums
Dave Maystrick

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Louisa Generating Station Recommendations

1.2.1 Recommendations Regarding the Structural Stability

EPA Comment: MEC should consider measures to bring the slope stability factor of safety for steady state conditions for the Bottom Ash Pond, southwest dike section, up to the minimum USACE requirements for dams.

MEC Response: By December 31, 2011, MidAmerican Energy will re-review the calculations for the slope stability safety factor for the "A" section of the bottom ash pond with the contractor that provided the analysis. It is likely that the analysis was conservative based on the initial safety factor target of 1.4. However, based on this additional review, if necessary, an action plan and schedule will be developed by January 2012, to ensure this section of the bottom ash pond meets the minimum safety factor of 1.5. Any work necessary to achieve such minimum safety factor of 1.5 will be completed by September 30, 2012.

1.2.2 Recommendations Regarding the Supporting Technical Documentation

EPA Comment: Given the marginal nature of slope stability factor of safety analyses, MEC should perform analyses for rapid drawdown conditions and seismic loading conditions for the Bottom Ash Pond.

MEC Response: The suggested additional analyses for rapid drawdown and seismic loading conditions will be part of the review for the slope stability factor with the contractor as noted in the response to Section 1.2.1.

1.2.3 Recommendations Regarding the Maintenance and Methods of Operation

EPA Comment: Dense brush and trees should be removed from portions of the downstream/outside slopes; proper grass ground cover needs to be reestablished.

MEC Response: MidAmerican Energy is currently obtaining contractor bids to complete the brush and tree removal on the downstream and outside slopes of the surface impoundment. Grass ground cover will be reestablished as necessary. The work is anticipated to be completed by November 30, 2011.

1.2.4 Recommendations Regarding Continued Safe and Reliable Operation

EPA Comment: See Sections 1.2.1 and 1.2.2 above concerning the Bottom Ash Pond.

MEC Response: Please refer to responses to Sections 1.2.1 and 1.2.2. In addition, Louisa Generating Station has developed a Coal Combustion Residual Operation and Maintenance Plan which requires monthly inspections by site personnel and annual inspections by a professional engineer. All inspections are being documented and maintained in the site files for a minimum of five years, and any noted deficiencies are being promptly addressed.