

US EPA ARCHIVE DOCUMENT



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

July 26, 2011

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL

Ms. Cathy Woollums, Senior Vice President Environmental Services  
Mid American Energy Company  
P.O. Box 657  
Des Moines, IA 50306-0657

Dear Ms. Woollums,

On September 14, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Riverside Generating 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 Riverside Generating 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 Riverside Generating Station facility is enclosed. 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 Riverside Generating Station 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 provide a rationale. Please provide a response to this request by August 23, 2011. 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  
5<sup>th</sup> Floor, N-5838  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@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

Enclosures

**Riverside Generating Station Recommendations (from the final assessment report)**

**1.2.1 Recommendations Regarding the Structural Stability**

None appear warranted for the North Ash Pond.

Corrective measures should be implemented to improve the stability of the South Ash Pond in order to meet required safety standards for dams. MEC is aware of the deficiency and is preparing and intends to implement plans to address this concern. USEPA has requested that MEC document their plans for the improvement.

**1.2.2 Recommendations Regarding the Maintenance and Methods of Operation**

Maintenance should be performed on the North Ash Pond embankments consisting of the removal of thick woody-stemmed vegetation, dense brush and trees covering the upstream and downstream slope and establishing a grassed condition. Photo documentation has been provided by MidAmerican (see Appendix A, Doc 13), subsequent to the site visit, that indicate that this maintenance has been performed.

**1.2.3 Recommendations Regarding the Field Observations**

A thorough visual observation should be made of the North Ash Pond embankments by the State of Iowa now that MidAmerican has removed thick woody-stemmed vegetation, dense brush and trees covering the upstream and downstream slopes.

**1.2.4 Recommendations Regarding Continued Safe and Reliable Operation**

The North Ash Pond is recommended to be deactivated as it no longer receives coal combustion wastes.

**The South Ash Pond needs immediate remedial action to improve the factors of safety against slope instability.**