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Jim Bridger Plant
P.O. Box 158
Point of Rocks, WY 82942

PACIFICORP ENERGY
A PACIFICORP COMPANY

March 30, 2009

Mr. Richard Kinch
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Dr.
5th Floor; N-5783
Arlington, VA 22202-2733

Via Overnight Delivery

Re: Jim Bridger Power Station: Request for Information Under Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9604(e) dated March 9, 2009 and received on March 16, 2009

Dear Mr. Kinch,

This letter and the enclosed materials constitute the response of the Jim Bridger Power Station to the above Request for Information. Specifically, this letter and the enclosed materials provide the Jim Bridger Power Station's response "to each request for information set forth in the Enclosure [A], including all documents responsive to such request."

Although PacifiCorp, as operator of the Jim Bridger Power Station, intends to cooperate fully in responding to the Request for Information, this response is made subject to the, objections and other exceptions as noted herein.

Moreover, PacifiCorp affirmatively asserts that the ten business day response deadline contained in the Request for Information is unrealistically short and does not reasonably reflect the type and volume of responsive information which EPA has requested, particularly when considering that PacifiCorp is required to provide similar responses at three other facilities at the same time. Therefore, PacifiCorp objects to this deadline and reserves the right to supplement this response after the 10 business day deadline with any materials that it was unable to gather and submit by the requested deadline.

Please be aware that PacifiCorp has included in this response those "surface impoundments or similar diked or bermed management unit(s)" at the Jim Bridger Power Station which appear to be covered by the Request for Information. These "surface impoundments or similar diked or bermed management units" are described in more detail below. PacifiCorp has not included in this response; however, stormwater and wastewater retention basins which are neither managed nor operated as coal combustion waste impoundments even though they may contain storm or waste water which has been in incidental contact with coal ash or coal combustion products. Please advise us to the

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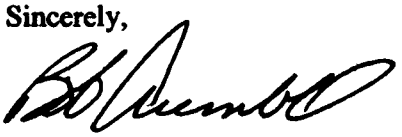
extent EPA interprets its Request for Information to include these stormwater and wastewater retention basins.

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

If you have any questions regarding this response, please direct them to Mr. Brett Shakespear at 801-220-2575 or at brett.shakespear@pacificorp.com. Legal inquires should be made to Mr. Michael Jenkins at 801-220-2233 or at michael.jenkins@pacificorp.com.

Sincerely,



Bob Arambel
Managing Director
Jim Bridger Power Station

cc: Brett Shakespear, Michael Jenkins

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Response To Enclosure A For FGD Pond #1

The term "FGD Pond #1" as used in this response means a single pond with no discharge which received flue gas desulphurization solution from the plant scrubbers. This pond is no longer receiving any material and has been dewatered. The pond is currently being closed. EPA's Enclosure A requests are reproduced below in italics and separated within request numbers for ease of response. The responses below are offered without waiving any of the objections noted herein and in the cover letter.

Jim Bridger Power Station Response to Request No. 1

"Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit"

The rating for FGD Pond #1 is Significant.

"Indicate who established the rating"

Wyoming State Engineer.

"What the basis of the rating is"

As per the Wyoming State Engineer's Office, in the event of a dam failure, substantial property damage could be expected, but loss of life, although possible, is not expected.

"What federal or state agency regulates the unit(s)"

Wyoming State Engineer.

"If the unit(s) does not have a rating, please note that fact"

NA

Jim Bridger Power Station Response to Request No. 2

"What year was each management unit commissioned and expanded?"

FGD Pond #1 was placed in service in 1979.

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FGD Pond #1 was expanded in 1989.

FGD Pond #1 no longer functions as an active disposal pond and a closure Corrective Action Plan has been submitted to the Wyoming Department of Environmental Quality.

Jim Bridger Power Station Response to Request No. 3

"What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash: (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s)."

The following categories of material have been placed in FGD Pond #1: fly ash (small amounts collected in the scrubbers after the electrostatic precipitators); bottom ash (6 inch cap on pond surface to control fugitive dust); and flue gas emission control residuals.

Jim Bridger Power Station Response to Request No. 4

"Was the management unit(s) designed by a Professional Engineer?"

Yes

"Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer?"

PacifiCorp has been unable to locate documentation to make this assessment.

"Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?"

The Wyoming State Engineer's Office periodically inspects and monitors FGD Pond #1.

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Jim Bridger Power Station Response to Request No. 5

"When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)?"

FGD Pond #1 was last internally inspected on February 14, 2009. An external inspection was performed on March 4 and 5, 2009.

"Briefly describe the credentials of those conducting the structural integrity assessments/evaluations."

The internal inspection of FGD Pond #1 was completed, by PacifiCorp employee Roger L. Raeburn, whose title is Engineering Manager, Dam Safety and who is licensed as a Professional Engineer in the state of Oregon. The external inspection was completed by Cornforth Consultants, Inc., a geotechnical firm staffed with professional engineers and certified engineering geologists.

"Identify actions taken or planned by facility personnel as a result of these assessments or evaluations."

The recent inspections will be evaluated as they are received, and actions, if any, will be based on the results.

"If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors."

See response above.

"If the company plans an assessment or evaluation in the future, when is it expected to occur?"

The need for further assessments or evaluations and their frequencies will be based on the results of the recently completed inspections.

Jim Bridger Power Station Response to Request No. 6

"When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)?"

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FGD Pond #1 was last inspected by the Wyoming State Engineer's Office on June 21, 2004.

"If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur?"

The Wyoming State Engineer's Office typically inspects this type of facility on a five year interval. While no notice has been received, an inspection is anticipated in 2009.

"Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation."

See response above.

"Please provide a copy of the most recent official inspection report or evaluation"

See attachment.

Jim Bridger Power Station Response to Request No. 7

"Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s)?"

No

"If so, describe the actions that have been or are being taken to deal with the issue or issues"

NA

"Please provide any documentation that you have for these actions."

NA

Jim Bridger Power Station Response to Request No. 8

"What is the surface area (acres) and total storage capacity of each of the management units?"

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The FGD Pond #1 surface area is 93 acres.

The FGD Pond #1 storage capacity is 1340 acre-feet.

"What is the volume of material currently stored in each of the management unit(s)?"

The volume of material in FGD Pond #1 is 1340 acre-feet.

Additionally, 74 acre feet of bottom ash was placed on top of the flue gas emissions control residuals to control fugitive dust during permit closure of management unit.

"Please provide the date that the volume measurement(s) was taken."

Exact measurements were not taken. The storage volume is based on FGD Pond #1 at full operational depth. The bottom ash placement volumes were calculated on January 8, 2009.

"Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure."

The maximum height of FGD Pond #1 is 32.5 feet.

Jim Bridger Power Station Response to Request No. 9

"Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater)."

Seepage from FGD Pond #1 surfaced on its south side within the last ten years. The seepage has been controlled with a cut off trench and pumped back into FGD Pond #1. Once FGD Pond #1 was taken out of service and partially dewatered, the seepage ceased. The seepage was reported to the Wyoming Department of Environmental Quality.

Jim Bridger Power Station Response to Request No. 10

"*Please identify all current legal owner(s) and operator(s) at the facility".*

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The current legal owner(s) of the Jim Bridger Power Station are PacifiCorp and Idaho Power Company. The current operator of the Jim Bridger Power Station is PacifiCorp.

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Response To Enclosure A For FGD Pond #2

The term "FGD Pond #2" as used in this response means a single pond with no discharge which receives flue gas desulphurization solution from the plant scrubbers. EPA's Enclosure A requests are reproduced below in italics and separated within request numbers for ease of response. The responses below are offered without waiving any of the objections noted herein and in the cover letter.

Jim Bridger Power Station Response to Request No. 1

"Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit"

The rating for FGD Pond #2 is Significant.

"Indicate who established the rating"

Wyoming State Engineer's Office.

"What the basis of the rating is"

As per the Wyoming State Engineer's Office, in the event of a dam failure, substantial property damage could be expected, but loss of life, although possible, is not expected.

"What federal or state agency regulates the unit(s)"

Wyoming State Engineer's Office.

"If the unit(s) does not have a rating, please note that fact"

NA

Jim Bridger Power Station Response to Request No. 2

"What year was each management unit commissioned and expanded?"

FGD Pond #2 was placed in service in 1990.

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FGD Pond #2 was expanded in 2002 and 2003.

Jim Bridger Power Station Response to Request No. 3

"What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash: (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s)."

The following categories of material have been placed in FGD Pond #2: fly ash (small amount collected in the scrubber after the electrostatic precipitators); flue gas emission control residuals.

Jim Bridger Power Station Response to Request No. 4

"Was the management unit(s) designed by a Professional Engineer?"

Yes

"Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer?"

Yes

"Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?"

The Wyoming State Engineer's Office periodically inspects FGD Pond #2.

Jim Bridger Power Station Response to Request No. 5

"When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)?"

FGD Pond #2 was last inspected by an internal engineer on February 14, 2009. An inspection by external consultants was performed on March 4 and 5, 2009.

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"Briefly describe the credentials of those conducting the structural integrity assessments/evaluations."

The internal inspection of FGD Pond #2 was completed, by PacifiCorp employee Roger L. Raeburn, whose title is Engineering Manager, Dam Safety and who is licensed as a Professional Engineer in the state of Oregon. The external inspection was completed by Cornforth Consultants, Inc., a geotechnical firm staffed with professional engineers and certified engineering geologists.

"Identify actions taken or planned by facility personnel as a result of these assessments or evaluations."

The recent inspections will be evaluated as they are received, and actions, if any, will be based on the results.

"If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors."

No corrective actions were identified.

"If the company plans an assessment or evaluation in the future, when is it expected to occur?"

PacifiCorp has commissioned an in-depth design review of the management unit design and geology by Cornforth Consultants, Inc.

Jim Bridger Power Station Response to Request No. 6

"When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)?"

FGD Pond #2 was last inspected by the Wyoming State Engineer's Office on June 21, 2004.

"If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur?"

The Wyoming State Engineer's Office typically inspects this type of facility on a five year interval. While no notice has been received, an inspection is anticipated in 2009.

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"Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation."

See response above.

"Please provide a copy of the most recent official inspection report or evaluation"

See Attachment.

Jim Bridger Power Station Response to Request No. 7

"Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s)?"

No

"If so, describe the actions that have been or are being taken to deal with the issue or issues"

NA

"Please provide any documentation that you have for these actions."

NA

Jim Bridger Power Station Response to Request No. 8

"What is the surface area (acres) and total storage capacity of each of the management units?"

The FGD Pond #2 surface area is 392 acres.

The FGD Pond #2 storage capacity is 11,534 acre-feet.

"What is the volume of material currently stored in each of the management unit(s)?"

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The volume of material in FGD Pond #2 is approximately 2,968 acre-feet.

"Please provide the date that the volume measurement(s) was taken."

Exact measurements were not taken. Storage volume was estimated using pond depth readings taken March 13, 2009.

"Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure."

The maximum height of FGD Pond #2 is 42 feet.

Jim Bridger Power Station Response to Request No. 9

"Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater)."

Seepage from FGD Pond #2 has surfaced on its north side within the last ten years. FGD Pond #2 at this location was constructed with a toe drain and collection sump. The design engineer anticipated seepage could occur due to fractures in the base shale. The seepage is controlled by a pump in the collection sump that pumps the collected fluid back into FGD Pond #2. Seepage is estimated at 10,000 gallons per month based on the pump back system's electrical demand. Core drilling and a dye study confirmed the seepage is through the base formation. The seepage was reported to the Wyoming Department of Environmental Quality.

Jim Bridger Power Station Response to Request No. 10

"Please identify all current legal owner(s) and operator(s) at the facility."

The current legal owner(s) of the Jim Bridger Power Station are PacifiCorp and Idaho Power Company. The current operator of the Jim Bridger Power Station is PacifiCorp.

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Objections To Enclosure A

Jim Bridger Power Station Objections to the Introductory Paragraph of Enclosure A: PacifiCorp objects to the general request for information contained in the introductory paragraph of Enclosure A, including the information "requested below," on the grounds that the request is outside the scope of EPA's authority as contained in Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9604(e). Moreover, PacifiCorp objects to this general request because it contains undefined and ambiguous terms such as "surface impoundment" "similar diked or bermed management unit(s)," "landfills," "liquid-borne material," "storage or disposal," "no longer receive," "coal combustion residues," "residuals or byproducts," "residues or by-products" and "free liquids" and because some of these terms seem to be used interchangeably within the introductory paragraph and in other requests without an explanation of whether they are intended to have the same meaning.

Jim Bridger Power Station Objections to Request No. 1: PacifiCorp objects to Request No. 1 because it contains undefined and ambiguous terms such as "management unit" and "unit(s)" and because some or all of these terms seem to be used interchangeably within this request and in other requests without an explanation of whether they are intended to have the same meaning.

Jim Bridger Power Station Objections to Request No. 2: PacifiCorp objects to Request No. 2 because it contains undefined and ambiguous terms such as "management unit," "unit(s)", "commissioned" and "expanded" and because some or all of these terms seem to be used interchangeably within this request and in other requests without an explanation of whether they are intended to have the same meaning.

Jim Bridger Power Station Objections to Request No. 3: PacifiCorp objects to Request No. 3 because it contains undefined and ambiguous terms such as "temporarily," "permanently," "management unit(s)" and "unit(s)" and because some or all of these terms seem to be used interchangeably within this request and in other requests without an explanation of whether they are intended to have the same meaning.

Jim Bridger Power Station Objections to Request No. 4: PacifiCorp objects to Request No. 4 because it contains undefined and ambiguous terms such as "management unit(s)", "designed," "construction," "waste management unit(s)", "inspection," and "monitoring" and also because it seems to use the terms "management unit(sand because some or all of these terms seem to be used interchangeably within this request and in other requests without an explanation of whether they are intended to have the same meaning.

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Jim Bridger Power Station Objections to Request No. 5: PacifiCorp objects to Request No. 5 because it contains undefined and ambiguous terms such as "safety," "structural integrity," "management unit(s)," "assessments," "evaluations," "actions," "corrective actions," and because some or all of these terms seem to be used interchangeably within this request and in other requests without an explanation of whether they are intended to have the same meaning.

Jim Bridger Power Station Objections to Request No. 6: PacifiCorp objects to Request No. 6 because it contains undefined and ambiguous terms such as "official," "safety," "structural integrity," "management unit(s)," "inspection," "evaluation," "actions," "official inspection report," and because some or all of these terms seem to be used interchangeably within this request and in other requests without an explanation of whether they are intended to have the same meaning.

Jim Bridger Power Station Objections to Request No. 7: PacifiCorp objects to Request No. 7 because it contains undefined and ambiguous terms such as "assessments," "evaluations," "inspections," "officials," "safety issue(s)," "management unit(s)," "actions," and "deal with" and because some or all of these terms seem to be used interchangeably within this request and in other requests without an explanation of whether they are intended to have the same meaning.

Jim Bridger Power Station Objections to Request No. 8: PacifiCorp objects to Request No. 8 because it contains undefined and ambiguous terms such as "surface area (acres)," "total storage capacity," "management units," "volume," "material," "stored," "volume measurements," and "maximum height" and because some or all of these terms seem to be used interchangeably within this request and in other requests without an explanation of whether they are intended to have the same meaning.

Jim Bridger Power Station Objections to Request No. 9: PacifiCorp objects to Request No. 9 because it contains undefined and ambiguous terms such as "known spills," "unpermitted releases," "unit," "surface water," "land," and "groundwater" and because some or all of these terms seem to be used interchangeably within this request and in other requests without an explanation of whether they are intended to have the same meaning.

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