

US EPA ARCHIVE DOCUMENT



Naughton Plant
P.O. Box 191
Kemmerer, Wyoming 83101

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: Naughton 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 Naughton Power Station to the above Request for Information. Specifically, this letter and the enclosed materials provide the Naughton 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 Naughton Power Station, intends to cooperate fully in responding to the Request for Information, this response is made subject to the assertions of confidential business information, objections and other exceptions as noted herein.

Moreover, PacifiCorp affirmatively asserts that the ten business day 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.

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

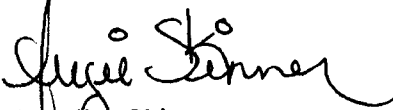
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with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for fathering the information, 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,

A handwritten signature in black ink, appearing to read "Angelina Skinner". The signature is fluid and cursive, with a large initial "A" and "S".

Angelina Skinner
Managing Director
Naughton Power Station

cc: Brett Shakespear, Michael Jenkins

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 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.

Naughton 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”

NA

“Indicate who established the rating”

NA

“What the basis of the rating is”

NA

“What federal or state agency regulates the unit(s)”

No agency regulates the structural integrity of FGD Pond #1.

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

FGD Pond #1 does not have a hazard rating.

Naughton Power Station Response to Request No. 2

“What year was each management unit commissioned and expanded?”

FGD Pond #1 was commissioned in 1981.

FGD Pond #1 was expanded in 1986, 1990, 1994, and 2005.

Naughton 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 materials have been placed in FGD Pond #1: fly ash; flue gas emission control residuals; other.

The "other" category of materials consists of boiler chemical clean rinse waste, and scrubber water treatment.

Naughton Power Station Response to Request No. 4

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

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

"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?"

No

Naughton 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)?"

February 18, 2009

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

Response to Enclosure A of Section 104(e) Letter dated March 9, 2009 and received on
March 16, 2009

Cornforth Consultants, Inc., a geotechnical firm staffed with professional engineers and certified engineering geologists, is conducting the evaluations.

"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.

Naughton 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)?"

PacifiCorp is unaware of any regulatory inspections or evaluations that may have occurred.

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

PacifiCorp is unaware of any planned state or federal inspections of FGD Pond #1.

"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”

NA

Naughton 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)?”

NA

“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

Naughton Power Station Response to Request No. 8

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

The surface area of FGD Pond #1 is 40 acres.

The FGD Pond #1 storage capacity is 1037.78 acre-feet.

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

The volume of material currently stored in FGD Pond #1 is approximately 864.08 acre-feet.

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

Exact measurements were not taken. An estimate was made on November 7, 2008.

“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 36.5 feet.

Naughton 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).”

No known spills or unpermitted releases have occurred in connection with FGD Pond #1 within the last ten years.

Naughton Power Station Response to Request No. 10

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

The current legal owner of the Naughton Power Station is PacifiCorp. The current operator of the Naughton Power Station is PacifiCorp.

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.

Naughton 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”

Wyoming Dam Inspection.

“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

Naughton Power Station Response to Request No. 2

“What year was each management unit commissioned and expanded?”

FGD Pond #2 was commissioned in 1999.

Naughton 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 materials have been placed in FGD Pond #2: fly ash; flue gas emission control residuals; other.

The "other" category of materials consists of boiler chemical clean rinse waste, and scrubber water treatment.

Naughton 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 and monitors FGD Pond #2.

Naughton 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)?"

February 18, 2009

Response to Enclosure A of Section 104(e) Letter dated March 9, 2009 and received on March 16, 2009

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

Cornforth Consultants, Inc., a geotechnical firm staffed with professional engineers and certified engineering geologists, is conducting the evaluations.

"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.

Naughton 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)?"

September 30, 2008

"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 2013.

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

Wyoming State Engineer's Office.

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

See attachment.

Naughton 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

Naughton 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 Pond surface area is 40 acres.

The FGD Pond #2 storage capacity is 671 acre feet.

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

The volume of material currently stored in FGD Pond #2 is approximately 382.2 acre-feet.

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

Exact measurements were not taken. An estimate was made on November 7, 2008.

"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 25 feet.

Naughton 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)."

Groundwater sampling data indicated leakage from FGD Pond #2. Wyoming DEQ was contacted and a permitted pump back system installed in November 2006.

Naughton Power Station Response to Request No. 10

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

The current legal owner of the Naughton Power Station is PacifiCorp. The current operator of the Naughton Power Station is PacifiCorp.

Response To Enclosure A For North Ash Pond

The term "North Ash Pond" as used in this response means a two celled pond with a bottom ash cell and a clear water cell. The two cells are separated by an earthen berm with the water from the bottom ash pond flowing into the clear cell. 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.

Naughton 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 the North Ash Pond is Low.

"Indicate who established the rating"

Wyoming State Engineer's Office.

"What the basis of the rating is"

Wyoming Dam Inspection.

"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

Naughton Power Station Response to Request No. 2

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

The North Ash Pond was commissioned in 1973-1974.

The North Ash Pond was expanded in 1982, 1987, 1993-1994.

Naughton 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 materials have been placed in the North Ash Pond: fly ash; bottom ash; boiler slag; other.

The “other” category of materials consists of plant and yard stormwater runoff, plant drain effluent, fire protection water, boiler blow down water, cooling tower water, boiler chemical clean rinse, wastewater treatment plant effluent, general wash down water, and treated sanitary waste.

Naughton Power Station Response to Request No. 4

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

PacifiCorp has been unable to locate documentation to make this assessment. The 1993-1994 expansion was designed by a Professional Engineer.

“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. The 1993-1994 expansion was supervised by a Professional Engineer.

“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 the North Ash Pond.

Naughton 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)?”

Response to Enclosure A of Section 104(e) Letter dated March 9, 2009 and received on March 16, 2009

February 18, 2009

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

Cornforth Consultants, Inc., a geotechnical firm staffed with professional engineers and certified engineering geologists, is conducting the evaluations.

“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.

Naughton 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)?”

August 12, 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.

Naughton 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

Naughton Power Station Response to Request No. 8

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

The North Ash Pond surface area is 151.5 acres. The clearwater surface area is 63 acres.

The North Ash Pond Storage Capacity is 2099.7 acre-feet. The clearwater storage capacity is 1270 acre-feet.

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

The volume of material currently stored in North Ash Pond is approximately 395.5 acre-feet.

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

Exact measurements were not taken. An estimate was made in November 2008.

“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 the North Ash Pond is 61 feet.

Naughton 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).”

Over the course of several years, approximately 55,000 cubic yards of fly ash have come to be located outside the North Ash Pond construction boundaries. The circumstance was reported to Wyoming Department of Environmental Quality on February 12, 2009.

Naughton Power Station Response to Request No. 10

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

The current legal owner of the Naughton Power Station is PacifiCorp. The current operator of the Naughton Power Station is PacifiCorp.

Response To Enclosure A For South Ash Pond

The term "South Ash Pond" as used in this response means a two celled pond with a bottom ash cell and a clear water cell. The two cells are separated by an earthen berm with the water from the bottom ash pond flowing into the clear cell. 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.

Naughton 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 the South Ash Pond is Low.

"Indicate who established the rating"

Wyoming State Engineer's Office.

"What the basis of the rating is"

Wyoming Dam Inspection.

"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

Naughton Power Station Response to Request No. 2

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

The South Ash Pond was commissioned in 1973-1974.

The South Ash Pond was expanded in 1976, 1981, 1987, and 1993-1994.

Naughton 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 materials have been placed in the South Ash Pond: fly ash; bottom ash; other.

The “other” category of materials consists of plant and yard stormwater runoff, plant drain effluent, fire protection water, boiler blow down water, cooling tower water, boiler chemical clean rinse, wastewater treatment plant effluent, and general wash down water.

Naughton Power Station Response to Request No. 4

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

PacifiCorp has been unable to locate documentation to make this assessment. The expansions to the South Ash Pond were designed by a Professional Engineer.

“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. The expansions to the South Ash Pond were supervised by a Professional Engineer.

“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 the South Ash Pond.

Naughton 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)?”

February 18, 2009

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

Cornforth Consultants, Inc., a geotechnical firm staffed with professional engineers and certified engineering geologists, is conducting the evaluations.

“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.

Naughton 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)?”

August 12, 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.

Naughton 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

Naughton Power Station Response to Request No. 8

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

The South Ash Pond surface area is 182.6 acres. The clearwater surface area is 23 acres.

The South Ash Pond storage capacity is 3754 acre-feet. The clearwater storage capacity is 302.8 acre-feet.

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

The volume of material currently stored in South Ash Pond is approximately 800 acre-feet.

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

Exact measurements were not taken. An estimate was made on based on a calculation in January 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 the South Ash Pond is 71 feet.

Naughton 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).”

No known spills or unpermitted releases have occurred within the last ten years.

Naughton Power Station Response to Request No. 10

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

The current legal owner of the Naughton Power Station is PacifiCorp. The current operator of the Naughton Power Station is PacifiCorp.

Objections To Enclosure A

Naughton 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.

Naughton 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 these terms seem to be used interchangeably without an explanation of whether they are intended to have the same meaning.

Naughton Power Station Objections to Request No. 2: PacifiCorp objects to Request No. 2 because it contains undefined and ambiguous terms such as “management unit,” “commissioned” and “expanded.”

Naughton Power Station Objections to Request No. 3: PacifiCorp objects to Request No. 3 because it contains undefined and ambiguous terms such as “temporarily,” “permanently” and “unit(s).”

Naughton 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(s)” and “waste management unit(s)” interchangeably without an explanation of whether the terms are intended to have the same meaning.

Naughton 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 also because it seems to use the terms “actions” and “corrective actions” interchangeably without an explanation of whether the terms are intended to have the same meaning.

Naughton 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 also because it seems to use the terms “inspection,” “evaluation” and “assessment” within this request number and in conjunction with other request numbers interchangeably without an explanation of whether the terms are intended to have the same meaning.

Naughton 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 also because it seems to use the terms “inspections,” “evaluations” and “assessments” within this request number and in conjunction with other request numbers interchangeably without an explanation of whether the terms are intended to have the same meaning.

Naughton 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.”

Naughton 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.”