

US EPA ARCHIVE DOCUMENT



**Wyodak Power Plant
48 Wyodak Road
Gillette, WY 82718**

August 17, 2011

Mr. Stephen Hoffman
US Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive
5th Floor, N-5237
Arlington, VA 22202-2733

Dear Mr. Hoffman,

On July 28, 2011, the PacifiCorp Wyodak Power Plant received the final report for the Coal Ash Site Assessment conducted by EPA and its contractor on October 26, 2010. The letter that accompanied the report requested that the Wyodak Plant respond to each of the recommendations noted in Enclosure 2.

This letter and the attached document represent the Wyodak Plant's response to EPA's request. Each of the recommendations has been addressed with specific actions PacifiCorp will take, including a projected date of completion.

Prior to EPA's site assessment, PacifiCorp contracted with a firm specializing in dams and complex geotechnical studies to do a structural evaluation of the Wyodak Plant's coal combustion waste impoundment. The conclusion of that evaluation was very similar to the results of EPA's site assessment. That is, the impoundment at the Wyodak Plant exhibits no signs of structural instability.

PacifiCorp is committed to responsible environmental stewardship and safety at each of its facilities.

Sincerely,

Gary L. Harris
Plant Managing Director

Enclosure

PacifiCorp Response to EPA Recommendations

11.1 Corrective Measures and Analyses for the Structures

Implement field procedures to prevent potential for encroachment of excavations into the theoretical embankment prism described in Section 8.3 of the final report; procedures should include, but are not limited to, means to prevent undercutting the upstream slopes of embankment dikes when excavating bottom ash from the settling cell.

PacifiCorp Response: Excavations of coal combustion wastes occur approximately every two years, or as needed by the plant. The next scheduled cleaning of the impoundment will occur in the Spring of 2012. Prior to work at the impoundment, a surveyor demarcates the boundaries of the excavation area. PacifiCorp will update the language of the excavation contract to require the surveyor to demarcate the critical boundaries of the embankment to prevent over-excavation. This task will be completed by February 1, 2012.

11.3 Corrective Measures Required for Maintenance and Surveillance Procedures

Conduct regular visual observation of the upstream slope of the North Embankment Dam for sloughing, localized slope failures or other indications of slope instability. Repair upstream slope promptly upon discovery of any slope failure.

PacifiCorp Response: PacifiCorp conducts routine inspections of the embankments. Repairs will be made upon discovery of major slope failures.

Conduct regular visual observation of downstream slope of the North Embankment Dam for signs of surficial erosion. Repair downstream slope promptly upon discovery of any erosion features.

PacifiCorp Response: The area identified in this recommendation is controlled by a third party. PacifiCorp's north embankment is under the third party's haul road. PacifiCorp conducts routine inspections of the embankments and will notify the third party of any downstream slope erosion issues.

bxc: Brett Shakespear
Bernadette Hinshaw