

US EPA ARCHIVE DOCUMENT



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

January 13, 2014

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL

Mr. Laren Huntsman, Manager  
Hunter Power Plant  
PacifiCorp Energy  
P.O. Box 569  
Castle Dale Utah 84513-0569

Re: Request for Action Plan regarding PacifiCorp Energy - Hunter Power Plant

Dear Mr. Huntsman,

On September 13, 2012 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the PacifiCorp Energy - Hunter Power Plant 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 unit at the PacifiCorp Energy - Hunter Power Plant 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 PacifiCorp Energy - Hunter Power Plant facility is attached.

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 PacifiCorp Energy - Hunter Power Plant facility. These recommendations are listed in Enclosure 1.

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 **February 14, 2014**. Please send your response to:

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

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**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),  
dufficy.craig@epa.gov, [kelly.patrickm@epa.gov](mailto:kelly.patrickm@epa.gov) and [englander.jana@epa.gov](mailto:englander.jana@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,  
/Barnes Johnson /, Director  
Office of Resource Conservation and Recovery

Enclosures

**PacifiCorp Energy - Hunter Power Plant Recommendations (from the final assessment report)**

**CONCLUSIONS**

Based on the interviews with PacifiCorp Energy plant and corporate personnel, review of available design documents and observation or inspection of the plant impoundments and CCW management processes, O'Brien & Gere concludes the following: (1) CCW materials at the Hunter Power Plant are not being managed in surface impoundments or similar diked or bermed management units or management units designated as landfills that receive liquid-borne material and are used for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals; and (2) the facility has no inactive impoundments storing CCW materials that would be subject to the formal closure requirements set forth in applicable federal or state closure/reclamation regulations.

**RECOMMENDATIONS**

Based on the findings of our visual inspection and review of the available records for the Waste Water Ponds #1 and #2 and observation of the other active impoundments at the Hunter Power Plant, O'Brien & Gere has no recommendations related to CCW management at the facility.