

US EPA ARCHIVE DOCUMENT



PLATTE RIVER
POWER AUTHORITY

Estes Park • Fort Collins • Longmont • Loveland

March 19, 2009

Mr. Richard Kinch
U.S. Environmental Protection Agency (5306P)
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

RE: Request for Information Under Section 104 (e) of the Comprehensive
Environmental Response, Compensation, and Recovery Act, 42 U.S.C. 9604(e)

Dear Mr Kinch:

Platte River Power Authority (Platte River) is responding to your March 9, 2009 information request concerning coal combustion by-products impoundments at the Rawhide Energy Station. We received two information requests from you, one addressed to our Corporate Executive Officer at our main Headquarters (2000 East Horsetooth Road, Fort Collins, Colorado 80525) and the other to Rawhide Energy Station (2700 East County Road 82, Wellington, Colorado 80549). We are responding to both requests under this one correspondence for the impoundments located and managed at the Rawhide facility. Platte River does not own or operate ash management facilities at any other location.

Attached is the information requested for each surface impoundment at Rawhide Energy Station which receives liquidborne material for the temporary storage of bottom ash, boiler slag, and economizer ash. The two impoundments are the facility's bottom ash transfer ponds which are used for temporary storage of the material before it is permanently transported to the Rawhide Coal Combustion By-Products Monofill, a permanent dry storage repository. No fly ash is transported to or stored in the bottom ash transfer ponds.

Please contact me at 970-229-1705 or Chris Wood, Environmental Engineer at 970-266-7906 if you have any questions. Thank you.

Sincerely,

Jason E. Frisbie
Division Manager, Power Production
Rawhide Energy Station, Platte River Power Authority

RESPONSE TO U.S. ENVIRONMENTAL PROTECTION AGENCY REQUEST FOR
INFORMATION UNDER SECTION 104 (e) OF THE COMPREHENSIVE
ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT,
42 U.S.C. 9604 (e)
PLATTE RIVER POWER AUTHORITY
RAWHIDE ENERGY STATION

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 persons 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.

Signature: Jason E. Frisbie Date: 3/19/09

Name: Jason E. Frisbie

Title: Division Manager, Power Production, Rawhide Energy Station

(Please provide the information requested below for each surface impoundment or similar diked or bermed management unit(s) or management units designated as landfills which receive liquidborne material 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.)

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less than Low Hazard Potential, please provide the rating for each management unit and indicate which State or federal regulatory agency assigned that rating. If the unit does not have a rating, please note that fact.

The impoundments (two bottom ash transfer ponds) located at the Rawhide Energy Station containing liquidborne coal combustion by-products have not been rated by NID criteria by a State or Federal agency, nor is such a certification required for these ponds.

2. What year was each management unit commissioned and expanded?

The Rawhide Energy Station, including the bottom ash transfer ponds, was commissioned in 1984. No expansion or other significant modifications to the bottom ash transfer ponds have been conducted to date or are planned.

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 two bottom ash transfer ponds are designed to temporarily store:

- bottom ash
- boiler slag
- other: economizer ash

After dewatering, the coal combustion by-products are transported to a dry monofill (permitted under a Certificate of Designation with Larimer County and approved by the State of Colorado) located on site.

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional engineer?

The bottom ash transfer ponds design was certified by a licensed Professional Engineer (Black & Veatch). The pond's construction was supervised by a Professional Engineer (also Black & Veatch). Structural inspection and monitoring are currently supervised by a Professional Engineer.

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

The bottom ash transfer ponds were excavated below natural ground level and continue to be operated as such; therefore structural integrity assessments are not necessary. Additionally, the Rawhide Energy Station has seven groundwater monitoring wells (one

up gradient and four down gradient from the bottom ash transfer ponds) that are sampled and analyzed on a routine basis.

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Not applicable. There are no State of Colorado or Federal regulatory requirements for inspection or evaluations of the bottom ash transfer ponds. Both the Colorado Department of Public Health and Environment and Larimer County annually inspect the coal combustion by-products monofill.

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), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

Not applicable.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material currently stored in each of the management unit(s). Please provide the date that the volume measurement was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this enclosure.

Two bottom ash transfer ponds are located at the Rawhide Energy Station. Each pond has a surface area of 4 acres and with a maximum individual capacity of 37 acre-feet.

Volume of coal combustion by-products stored in each bottom ash transfer pond as of March 18, 2009:

- North bottom ash transfer pond: 0 acre-feet
- South bottom ash transfer pond: 12 acre-feet

Both bottom ash transfer ponds were constructed *completely below grade* and therefore have no crest height.

**PLATTE RIVER POWER AUTHORITY
RAWHIDE ENERGY STATION**

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 spills or releases have occurred from any impoundment containing liquidborne coal combustion by-products at the Rawhide Energy Station.

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

Platte River Power Authority is the current legal owner and operator of this facility.