

US EPA ARCHIVE DOCUMENT

MEMORANDUM

SUBJECT: EPA Comments on "Assessment of Dam Safety of Coal Combustion Surface
Impoundments: "Prairie Power Inc – Pearl Power Plant, Pearl, IL"

DATE: January 7, 2014

1. EPA has been made aware that Prairie Power Inc. (PPI) has entered into a formal written agreement with Illinois Environmental Protection Agency (IEPA) to formally close the ash impoundment at the Pearl Facility. In light of this information, EPA is withholding its condition rating for the ash impoundment at the Pearl Facility. No recommendations should be made regarding these impoundments. It has been EPA's policy throughout the CCR Dam Assessment effort that facilities that are under formal closure agreement with appropriate state agencies do not fall within the scope of the assessment. The report, however, may maintain the information gathered from the assessment.
2. On page 1-7, Section 1.6.2, add back the signature line for Albert Ayenu-Prah, CDM Smith.
3. Please correct the font change made to the last paragraph in Section 2.1 on page 2-1.
4. On pages 6-1 and 6-2, the font/color for the subsection titles for 6.1.4.1, 6.1.4.2 and 6.1.4.3 are different from the rest of the report. Please correct.
5. On page 7-2, Section 7.1.4, first paragraph, second line, add "for" after "available".

From: [Mauer, Paul](#)
To: [Englander, Jana](#); [Cisneros, Jose](#)
Cc: [Hoffman, Stephen](#); [Dufficy, Craig](#); [Kelly, PatrickM](#)
Subject: RE: Comment Request on Coal Ash Site Assessment Round 12 Draft Report – Prairie Power, Inc. Pearl Power Plant
Date: Monday, January 13, 2014 6:23:26 PM

I have reviewed the draft document. Generally I note for your record that the owner has applied for a permit to modify the structure for closure. We concur with the Significant hazard classification. (note that the river name is wrong in Table 2-2) I have the following comments:

1. The report indicates that IL Rte 100 is on the west embankment of the structure. The correct description would be that the north and south embankments tie into the Rte 100 embankment. Rte 100 predates the CCW impoundment by about 50 years. While an internal slope slide is not impossible, the permanent inundation of the toe of the highway embankment would have to have been evaluated by the Illinois Department of Transportation and would not have been allowed if it significantly reduced the stability of the embankment. The risk to Rte 100 is negligible.
2. The only condition rating is POOR and appears in 1.4.8. The assessment is based upon the field observations and a lack of supporting technical documentation. The field observations note that there are deficiencies related to the vegetation management, a broken pipe inlet and surface erosion of the embankment. These observations are to be expected for a structure that is not in use. None of these observations, alone or in combination, justify a POOR rating. There are no observations that indicate serious deficiencies. The lack of technical support data is a neutral finding with respect to the condition of the structure. Based upon the information available to the inspection, it would seem more appropriate to note the lack of observation of serious conditions, but defer any assignment of condition based upon the overall lack of information regarding the adequacy of the structure.

Thank you for the opportunity to comment on the draft report.

Paul Mauer, Jr., P.E.
Senior Dam Safety Engineer
Illinois Department of Natural Resources

From: Englander, Jana [mailto:Englander.Jana@epa.gov]
Sent: Tuesday, January 07, 2014 12:36 PM
To: Mauer, Paul; Campbell, Jason; Cisneros, Jose
Cc: Hoffman, Stephen; Dufficy, Craig; Kelly, PatrickM; Englander, Jana
Subject: FW: Comment Request on Coal Ash Site Assessment Round 12 Draft Report – Prairie Power, Inc. Pearl Power Plant

Dear All,

We would like to offer Illinois and EPA Region 5 an opportunity to comment on the Draft Assessment Report on the Coal Combustion Residual Impoundment located at the facility below. Please let me know if you intend to comment or have any questions. Comments would be appreciated within 30 calendar days of receipt of this email. Thank you!
Regards,

Jana

Jana Englander

Office of Resource Conservation and Recovery,
Materials Recovery Waste Management Division
Energy Recovery and Waste Disposal Branch
U.S. Environmental Protection Agency
703-308-8711

From: Englander, Jana

Sent: Tuesday, January 07, 2014 11:27 AM

To: gseipel@ppi.coop; rjohnson@ppi.coop

Cc: Hoffman, Stephen; Dufficy, Craig; Kelly, PatrickM; Englander, Jana

Subject: Comment Request on Coal Ash Site Assessment Round 12 Draft Report – Prairie Power, Inc. Pearl Power Plant

Dear Mr. Seipel,

The draft assessment report for **Prairie Power, Inc. Pearl Power Plant** is ready for review. EPA would appreciate it if you would review and submit your comments on this report to us within 30 calendar days of receipt of this email. **Please confirm receipt of this email and send your comments to:**

Mr. Stephen Hoffman

US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

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

You may also provide your comments by e-mail to hoffman.stephen@epa.gov and 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.

The draft report is attached.

Please let me know if you have any questions/requests.

Respectfully,

Jana Englander

Jana Englander

Office of Resource Conservation and Recovery,
Materials Recovery Waste Management Division
Energy Recovery and Waste Disposal Branch
U.S. Environmental Protection Agency
703-308-8711



P. O. Box 610
Jacksonville, IL 62651
Telephone: 217/245-6161
Fax: 217/245-1705
www.ppi.coop

February 5, 2014

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

Re: ASSESSMENT OF DAM SAFETY OF COAL COMBUSTION SURFACE
IMPOUNDMENTS –DRAFT REPORT
PRAIRIE POWER INC., PEARL STATION

Dear Mr. Hoffman:

Prairie Power Inc. (PPI) is in receipt of CDM Smith's draft report regarding its assessment of the condition of the ash impoundment at our Pearl Station facility, and has reviewed the report. As specifically noted in Section 1.1 of the draft report, the recommendations for actions to be taken in this report were made in the event that the plant was restarted. Rather than address individual items noted throughout the report PPI offers the following general comments to the CDM Smith draft report:

- As noted in Section 1.4 (Conclusions) of the draft report, the Pearl facility closed prior to the CDM Smith inspection on August 20 and 21, 2012. The official closure date was June 1, 2012, as evidenced by the enclosed notification letters from PPI to the following state and federal representatives: (1) Alan Keller, Manager, Permit Section Illinois Environmental Protection Agency, Division of Water Pollution dated February 29, 2012, (2) Ed Bakowski, Manager, Permit Section, Illinois Environmental Protection Agency, Division of Air Pollution Control dated June 8, 2012, and (3) Sabrina M. Argentieri, Esq., Assistant Regional Counsel, U.S. Environmental Protection Agency, Region V dated June 8, 2012. CDM Smith was notified by phone and email that the facility was closed prior to the inspection and they were notified that I would not be available the date of the inspection as I was out of town. To accommodate CDM Smith's schedule, PPI brought back a former employee to walk the inspectors around the site.
- On June 13, 2012, an application to remove the coal fired unit from the Clean Air Act Program Permit was sent to the IEPA.
- On July 26, 2012, an engineering firm was retained by PPI to formulate a closure plan for the ash impoundment, which resulted in a formal written agreement with the IEPA outlining the procedure to formally close the impoundment. On January 15, 2014, with necessary approvals, a

contract was awarded by PPI to close the ash impoundment as per the formal written agreement with the IEPA. Work to close the ash impoundment started immediately.

- Regarding the information provided in Section 3.2 of the draft report, the NPDES permit governing discharges from the Pearl power station to the Illinois River was in effect at the time of CDM Smith's on-site visit and remains in effect.
- One last observation is that the facility does not sit along the Atascosa River as noted on page 2.2. The facility is adjacent to the Illinois River, as noted in previous sections of the draft report.

Because the power plant and ash impoundment at the PPI Pearl Station have been permanently closed, it is PPI's position that the Significant Hazard Potential rating and poor condition status assigned by CDM Smith to the ash impoundment are not accurate. Again, as specifically noted in Section 1.1 of the CDM Smith draft report, the recommendations for actions to be taken were made in the event that the plant was restarted, but PPI has permanently closed the facility including the ash impoundment.

Should there be additional questions and/or concerns please contact me at 217-248-9158 or by email at, rfisher@ppi.coop.

Thank you for the opportunity to comment.

Randy Fisher
Superintendent of Generation

From: [Fisher, Randy](#)
To: [Hoffman, Stephen](#); [Englander, Jana](#)
Subject: Draft assessment report for Prairie Power, Inc. Pearl Power Plant
Date: Wednesday, February 05, 2014 11:12:52 AM

Mr. Hoffman

Thank you for the opportunity to review the draft report of the ash impoundment assessment for Prairie Power Inc., Pearl Station. The response is attached, additionally letters documenting the closure of the facility are attached.

Should have any questions please direct to me at 217-248-9158 or by email.

Randy Fisher
Superintendent of Generation
PO Box 10
13476 Rte 100
Pearl, IL 62361
☎ (Phone) 1 (217) 829 – 4212
(Cell) 1 (217) 829 – 9158
✉ (Email) rfisher@ppi.coop



***** ATTACHMENT NOT DELIVERED *****

This Email message contained an attachment named
image001.jpg
which may be a computer program. This attached computer program could
contain a computer virus which could cause harm to EPA's computers,
network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced
into the EPA network. EPA is deleting all computer program attachments
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If the message sender is known and the attachment was legitimate, you
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rename the file extension to its correct name.

For further information, please contact the EPA Call Center at
(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

***** ATTACHMENT NOT DELIVERED *****



P.O. Box 610
Jacksonville, IL 62651
Telephone: 217/245-6161
Fax: 217/245-1705
www.ppi.coop

June 8, 2012

VIA CERTIFIED MAIL

Sabrina M. Argentieri, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region V, C14J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Shutdown of Coal-fired Boiler
Prairie Power, Inc.
Highway 100 South, Pearl
Facility I.D. No. 149817AAB
Permit No. 95080060

Dear Ms. Argentieri:

On June 1, 2012, Prairie Power, Inc. ("PPI") began decommissioning the coal-fired boiler and associated equipment at the Pearl Station ("Pearl"). PPI has drained the fuel oil system that serves the boiler and has removed portions of the piping, rendering the boiler inoperable. In addition, the water has been removed from the boiler, and the make-up water system has been drained.

The coal-fired boiler at Pearl is currently permitted under PPI's CAAPP permit (No. 95080060). PPI is compiling a submittal to the Illinois Environmental Protection Agency ("Illinois EPA") to revise its CAAPP permit to reflect the changed operations at Pearl. The submittal will request revisions to the CAAPP permit to eliminate the boiler and the following associated equipment: coal handling equipment, crusher house, fly ash equipment, lime handling equipment, and heating boiler. Since PPI will continue to operate the combustion turbine, the turbine and its associated fuel tank will remain permitted.

COPY


Mr. Edwin Bakowski, P.E.

June 8, 2012

Page 2

Finally, also note that PPI's submittal to Illinois EPA will include a request to withdraw construction permit (No. 10020011), which was issued to PPI for Pearl on December 2, 2010. If you should have any questions regarding the above, please do not hesitate to contact me.

Sincerely,



Jay Bartlett

President and CEO


pc: N. LaDonna Driver, Esq.



Sabrina M. Argentieri, Esq.
June 8, 2012
Page 2

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Sincerely,



Jay Bartlett
President and CEO

pc: N. LaDonna Driver, Esq.
USEPA Region V Compliance Tracker





P.O. Box 610
Jacksonville, IL 62651
Telephone: 217/245-6161
Fax: 217/245-1705
www.ppi.coop

June 8, 2012

VIA CERTIFIED MAIL

Sabrina M. Argentieri, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region V, C14J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Shutdown of Coal-fired Boiler
Prairie Power, Inc.
Highway 100 South, Pearl
Facility I.D. No. 149817AAB
Permit No. 95080060

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Jacksonville, IL 62651
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June 8, 2012

VIA CERTIFIED MAIL

Mr. Edwin Bakowski, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control - MC #11
1021 North Grand Avenue East
P. O. Box 19276
Springfield, Illinois 62794-9276

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Highway 100 South, Pearl
Facility I.D. No. 149817AAB
Permit No. 95080060

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Jay Bartlett
President and CEO

pc: N. LaDonna Driver, Esq.
USEPA Region V Compliance Tracker

