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March 23, 2009

Mr. Richard Kinch
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Dr.
5th Floor; N-5783
Arlington, VA 22202 2733

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

Mr. Richard Kinch:

Enclosed please find the response to the Request for Information Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e) contained in the letter dated March 9, 2009 from Barry N. Breen, Acting Assistant Administrator, U.S. Environmental Protection Agency ("EPA Request"). The Salt River Project Agricultural Improvement & Power District (SRP) received the EPA Request on March 16, 2009.

The EPA Request seeks information concerning diked or bermed management units containing Coal Combustion Wastes at the SRP Coronado Generating Station located near the town of St. Johns in Apache County, Arizona. The Evaporation Dam that impounds the Evaporation Pond (reservoir) at the Coronado Generating Station is the only management unit meeting the description addressed in the EPA Request. This dam has the designation number 01.46 from the Arizona Department of Water Resources (ADWR).

The Coronado Generating Station has exercised the utmost care and diligence in examining whether any potential concerns exist with the Evaporation Pond Dam.

The requested certification, responses to the ten questions from the enclosure and additional supporting information are attached. If you have any questions concerning the information provided, please do not hesitate to call me at 928-337-5501.

Sincerely,

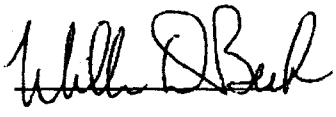
William D. Beck, Plant Manager
SRP / Coronado Generating Station

Attachments

cc: Glen Reeves
Daniel Casiraro
Prabhat Bhargava
Kent Liesemeyer
Karilee Ramaley
File: 05.02.07.01

Certification

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 person 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:  3/23/09

Name: William D. Beck

Title: Plant Manager

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

The answers to questions are provided in *italics* and supporting documents are included per the following List of Attachments:

List of Attachments

- **Attachment A – Responses to Requests for Information**
- **Attachment B - Drawing Nos. 13-C-ZHC-004, 13-C-ZHC-014, and 13-C-ZHC-015**
- **Attachment C - Evaporation Dam License of Approval**
- **Attachment D - CGS Evaporation Pond Monitoring Report**
- **Attachment E - Most Recent Dam Safety Report from ADWR, with Photos Accompanying ADWR Report**
- **Attachment F - Record of Topographic Survey from Isaacson Engineering**
- **Attachment G - Evaporation Pond Accumulation Table**

ATTACHMENT A

Responses to Requests for Information

Questions and Answers from the Enclosure

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 liquid-borne 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. This includes units that no longer receive coal combustion residues or by-products, but still contain free liquids.

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less than Low Hazard Potential, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulated the unit(s). If the unit(s) does not have a rating, please note that fact.

Response: The Coronado Generating Station (CGS) Evaporation Dam has been given a potential hazard rating of "Significant" by the Arizona Department of Water Resources (ADWR) Dam Safety Section. ADWR assigned that rating in accordance with the Arizona Administrative Code (A.A.C.) R12-15-1206, which provides as follows:

R12-15-1206. Classification of Dams

A. Size Classification. Dams are classified by size as small, intermediate, or large. Size is determined with reference to Table 2. An owner or engineer shall determine size by storage capacity or height, whichever results in the larger size.

B. Hazard Potential Classification

1. The Department shall base hazard potential classification on an evaluation of the probable present and future incremental adverse consequences that would result from the release of water or stored contents due to failure or improper operation of the dam or appurtenances, regardless of the condition of the dam. The evaluation shall include land use zoning and development projected for the affected area over the 10 year period following classification of the dam. The Department considers all of the following factors in hazard potential classification: probable loss of human life, economic and lifeline losses, and intangible losses identified and evaluated by a public resource management or protection agency.
    a. The Department bases the probable incremental loss of human life determination primarily on the number of permanent structures for human habitation that would be impacted in the event of failure or improper operation of a dam. The Department considers loss of human life unlikely if:
        i. Persons are only temporarily in the potential inundation area;
        ii. There are no residences or overnight campsites; and
        iii. The owner has control of access to the potential inundation area and provides an emergency action plan with a process for warning in the event of a dam failure or improper operation of a dam.
    b. The Department bases the probable economic, lifeline, and intangible loss determinations on the property losses, interruptions of services, and intangible losses that would be likely to result from failure or improper operation of a dam.
2. The 4 hazard potential classification levels are very low, low, significant, and high, listed in order of increasing probable adverse incremental consequences, as prescribed in Table 3. The Director shall classify intangible losses by considering the common or unique nature of features or habitats and temporary or permanent nature of changes.
    a. Very Low Hazard Potential. Failure or improper operation of a dam would be unlikely to result in loss of human life and would produce no lifeline losses and very low economic and intangible losses. Losses would be limited to the 100 year floodplain or property owned or controlled by the dam owner under long-term lease. The Department considers loss of life unlikely because there are no residences or overnight camp sites.
    b. Low Hazard Potential. Failure or improper operation of a dam would be unlikely to result in loss of human life, but would produce low economic and intangible losses, and result in no disruption of lifeline services that require more than cosmetic repair. Property losses would be limited to rural or agricultural property, including equipment, and isolated buildings.
    c. Significant Hazard Potential. Failure or improper operation of a dam would be unlikely to result in loss of human life but may cause significant or high economic loss, intangible damage requiring major mitigation,

and disruption or impact on lifeline facilities. Property losses would occur in a predominantly rural or agricultural area with a transient population but significant infrastructure.

d. High Hazard Potential. Failure or improper operation of a dam would be likely to cause loss of human life because of residential, commercial, or industrial development. Intangible losses may be major and potentially impossible to mitigate, critical lifeline services may be significantly disrupted, and property losses may be extensive.

3. An applicant shall demonstrate the hazard potential classification of a dam before filing an application to construct. The Department shall review the applicant's demonstration early in the design process at pre-application meetings prescribed in R12-15-1207(D).
4. The Department shall review the hazard potential classification of each dam during each subsequent dam safety inspection and revise the classification in accordance with current conditions.

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

Response: The Evaporation Dam was put in service in 1979. It has not been expanded since that time.

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).

Response: In addition to the ADWR oversight of the Evaporation Dam, the Evaporation Pond (reservoir) is a facility regulated by the Arizona Department of Environmental Quality (ADEQ) under the Aquifer Protection Permit (APP) Program (Permit Number 31312). The ADEQ APP program protects the state's aquifers from potential impacts from regulated units. The evaporation pond was designed for containment of plant wastewater and Flue Gas Desulfurization (FGD) residuals. The contents of the pond are primarily FGD residuals but may include some minor amounts of fly ash, bottom ash, boiler slag, and other materials (i.e., cooling tower blow-down water; non-hazardous boiler clean waste water; water treatment backwash, rinse and drain water; water from floor and equipment drains in various plant areas; and storm water runoff from the ash disposal area).

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?

Response: The Evaporation Dam / Pond was designed by a Professional Engineer and design drawings stamped by William Page Ehinger follow (Arizona Registered Professional Engineer Certificate 7420). See drawing Nos. 13-C-ZHC-004, 13-C-ZHC-014 & 13-C-ZHC-015 (included as Attachment B). Pursuant to Arizona law, ADWR has construction oversight of jurisdictional dams. Dan Roger Lawrence, a Professional Engineer with ADWR (Arizona Registered Professional Engineer Certificate 8162), was involved with construction oversight of the Evaporation Dam and signed the original ADWR permit (see License of Approval dated July 24, 1981, included as Attachment C). In addition, facility inspections and monitoring are conducted under the supervision of 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?

Response: The last survey to assess structural integrity was completed October 22, 2008. In addition, CGS conducts monthly inspections of the facility to verify that no deterioration or damage has occurred that would warrant additional assessment. The annual Evaporation Dam Settlement and Movement Surveys are performed by the SRP Survey Department under the auspices of an Arizona State Registered Land Surveyor. A copy of this survey is provided to ADWR (see CGS Evaporation Pond Monitoring Report dated October 22, 2008, included as Attachment D). No independent actions were identified beyond the repairs recommended in the ADWR report (all of which have been completed).

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.

Response: The ADWR Dam Safety Inspection Specialist last inspected the Evaporation Pond Dam on September 12, 2008. This dam falls under the jurisdiction of ADWR Division of Safety of Dams (SOD) program and is inspected every three years by an ADWR Inspection Specialist. ADWR's field inspector prepares a report, which is subsequently reviewed by the ADWR Section Manager. If there are deficiencies identified in the ADWR report, the dam owner is required to correct any defects and submit documentation of such correction to ADWR upon completion. Under ADWR policy, the state agency reviews the "License of Approval" for each operating dam within state jurisdiction following a Dam safety inspection. If the dam facility meets ADWR's SOD criteria, the current License remains in effect. The CGS Evaporation Pond Dam is currently in compliance with Arizona Revised Statutes §41-1009. ADWR will conduct the next Safety of Dam inspection in 2011 (A copy of the most recent ADWR Dam Safety Inspection Report, dated October 17, 2008, is included as Attachment E).

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.

Response: No safety deficiencies were found in the last inspection by ADWR, as shown in the ADWR Dam Safety Inspection Report included as Attachment E.

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.

Response:

Engineering Design Values

Reservoir Surface Area:	*330 acres*
Total Storage Capacity:	*4650 acre-feet*

Measured Values from 1980 Aerial Survey and 2009 Ground Survey (soundings March 2009)

Reservoir Surface Area:	*290 acres*
Total Storage Capacity from 1980 Survey:	*3365 acre-feet*

*Actual Reservoir Surface Area**	*172 acres*
Actual Reservoir Volume (water only):*	*1519 acre-feet*
Actual Reservoir Volume (sludge/solids):*	*745 acre-feet*

**Volume and Surface Area measurements as of March 1, 2009.*

See Attachment F - Record of Topographic Survey Drawing from Isaacson Engineering.
See Attachment G - Table of Evaporation Pond Accumulation from Isaacson Engineering.

The maximum height of the Evaporation Pond Dam is 61.3 feet, which is equivalent to the ADWR statutory dam height of 53 feet plus the design total freeboard of 8.3 feet. This height was determined consistent with the guidance included in the EPA request letter.

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).

Response: There have been no spills or unpermitted releases during the history of the Evaporation Dam.

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

Response: Salt River Project Agricultural Improvement and Power District is the sole owner and operator of the Coronado Generating Station.