OFFICE OF PUBLIC UTILITIES
CITY OF SPRINGFIELD, ILLINOIS
TIMOTHY J. DAVLIN, MAYOR
R. TODD RENFROW, GENERAL MANAGER

Via Federal Express

March 26, 2009

Mr. Richard Kinch
U.S. Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor N-5783
Arlington, VA 22203-2733

RE: Request for Information Under Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 USC 9604(e)

Dear Mr. Kinch:

In response to the letter dated March 9, 2009, from Barry Breen to the Plant Manager of the Dallman Power Station, please be advised that the City of Springfield, Illinois, owns and operates the V.Y. Dallman Power Station and the Lakeside Power Station at 3100 Stevenson Drive, Springfield, Sangamon County, Illinois. The City also operates a potable water treatment plant (filter plant) at this site. The station consists of three coal-fired boilers at Dallman and two coal-fired boilers at Lakeside. These plants generate electricity for the residents and businesses in Springfield and provide potable water to Springfield and surrounding communities. Approximately 200 people are employed at the power generating stations and an additional 20 people are employed at the water treatment plant.

The ash handling practices at the City are typical for a coal-fired power plant. Bottom ash and fly ash from all units are sluiced to ash ponds. The raw lake water used for sluicing is obtained from the once-through cooling water systems for the generator condensers. Three separate ash transport systems serve Dallman Units 31 and 32, Dallman Unit 33, and Lakeside.

The City operates two ash ponds, the Lakeside ash pond and the Dallman ash pond at this site, and has operating flexibility to determine which pond will receive ash.

Surface Impoundment Survey

1. *Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, 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 regulates the unit(s). If the unit(s) does not have a rating, please note that fact.*

Under the National Inventory of Dams, the Lakeside Ash Pond is listed as NPDP ID #IL50232. It's hazard class is low. Dallman Ash Pond is not listed on the Inventory.

In the State of Illinois, dam safety is regulated by the Illinois Department of Natural Resources (IDNR). The regulations are located at Illinois Administrative Code, Title 17: Conservation, Chapter I: Department of Natural Resources, Subchapter h: Water Resources, Part 3702 Construction and Maintenance of Dams.

In Illinois, there are three classifications of dams: Class I, Class II and Class III, based on degree of threat to life and property in the event of a dam failure. Class I has the highest hazard.

The City's two ash ponds were constructed prior to 1980, when Illinois adopted the dam safety regulations. They were inspected by IDNR soon after the regulations were adopted. At that time, the City was not required to obtain a dam permit. However, the Lakeside Ash Pond was modified in 1988, and was then required to obtain a Class III dam safety permit. Currently, Dallman Ash Pond does not have a dam safety permit.

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

The year the Lakeside Ash Pond was commissioned could not be determined. Based on an aerial photo, it was prior to 1958. The pond was expanded in 1988.

Construction began on Dallman Ash Pond in 1976. It has not been expanded.

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).*

Lakeside Ash Pond contains fly ash, bottom ash, boiler slag, flue gas emission control residuals (not including bulk amounts of scrubber sludge) and drinking water filter plant sludge.

Dallman Ash Pond contains fly ash, bottom ash, boiler slag, FGD landfill leachate and onsite industrial waste water treatment plant sludge.

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 Lakeside Ash Pond original designs could not be found. The expansion of Lakeside Ash Pond was designed by Hanson Engineers, Inc. The ash pond is inspected periodically by Hanson Engineers as required by the dam safety permit.

The Dallman Ash Pond was designed by Burns and McDonnell. The unit is not required to have periodic inspections by a Professional Engineer since it does not have a dam safety permit.

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 on assessment or evaluation in the future, when is it expected to occur?*

The Lakeside Ash Pond was last inspected by a Professional Engineer in July 2008 from Hanson Professional Services. The engineer, Danny Kerns, P.E., has evaluated this site during and after construction since 1987. There were two noted items that required minor repairs within the year. These were repairing erosion areas and regrading of the north embankment and scheduling the removal of small trees and brush. Safety integrity is listed as not yet imperiled for these measures. Corrective actions are in progress. The next inspection is due in 2013.

Dallman Ash Pond is not required to be inspected by a Professional Engineer since it does not have a dam safety permit.

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.*

The City is not aware of any federal inspections. It is our understanding the ponds were inspected by the State when the regulations were adopted, but the City does not have any records of those inspections. We are not aware of any planned future inspections.

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.*

There have been no inspections by State or Federal officials within the past year of Lakeside or Dallman Ash Ponds.

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

Dallman Ash Pond
Surface Area: 34.5 acres
Storage Capacity: 1,100,000 cu yd
Current Vol. Stored: 730,000 cu yd
Maximum Height: 20 ft
Date: Jan. 1, 2009

Lakeside Ash Pond
Surface Area: 35 acres
Storage Capacity: 1,200,000 cu yd
Current Vol. Stored: 1,080,000 cu yd
Maximum Height: 30 ft
Date: Jan. 1, 2009

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).

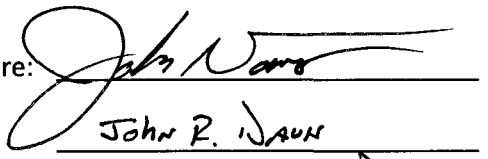
The Lakeside Ash Pond was inspected by Hanson Professional Services in June 1999. There was seepage in the North embankment. It was recommended to repair the holes to stop seepage. This report was filed with IDNR. The Lakeside Ash Pond was inspected by Hanson Professional Services in June 2000. No deficiencies were noted. This report was also filed with IDNR.

Lakeside Ash Pond was also inspected in July 2001, July 2003, and June 2004. In September 2004, a sink hole developed in the Northwest corner of the pond. The City hired Hanson to recommend a method to repair the sink hole and investigate a second sink hole that was developing. The areas were repaired.

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

Owner: City of Springfield
Operator: City of Springfield

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: 

Name: John R. Jaun

Title: Power Generation Director

If you should have any questions or require additional information regarding these responses, please contact me at (217) 757-8610, ext. 1105.

Sincerely,

S. David Farris, CIH, CSP
Environmental Health & Safety Manager

SDF/SC/gj