TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.
HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

May 13, 2009

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

Submitted also via Federal Express

RE: Response to EPA's Requests for Information Under Section 104 (e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9604(e) for the Craig Power Station

Dear Mr. Kinch:

Tri-State Generation and Transmission Association, Inc. (Tri-State) received the Request for Information (RFI) letter from the EPA for the Craig Power Station on May 5, 2009. On March 25, 2009, Tri-State notified the EPA of the Craig Power Station's "surface impoundments or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material from a surface impoundment 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."

The information requested is contained in the attachment. None of the information provided in this letter is considered confidential business information. It should be noted that the ash at the Craig Power Station is managed in a manner that is commonly referred to as a dry ash handling system. The materials from this facility are used for either mine reclamation or beneficial reuse (e.g., material substitution for construction activities).

The RFI requires this response include the following certification signed and dated by an authorized representative of Tri-State.

> I certify that the information contained in this response to EPA's request for information and the attached 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.

If you have any questions about the information provided, please contact Chris Gilbreath or me at (303) 452-6111.

Sincerely,

Barbara A. Walz
Vice President
Environmental

BAW:CSG:pvt

Attachment

cc: Ken Anderson
Mac McLennan
Micheal McInnes
Ken Reif

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

Tri-State Generation and Transmission Association, Inc.
Craig Station
("Craig Power Station" as described in the RFI)

The Craig Power Station's ash handling system is comprised of what is commonly referred to as a dry ash handling system. Materials generated at the facility, include: fly ash, bottom ash, flue gas emission control residuals and wastewater solids. Approximately 34% of the total ash (or 42% of the fly ash) generated at the facility is sold for beneficial reuse (e.g., fly ash is used for concrete. The remaining ash and residual by-products are disposed of at a permitted off-site coal mine. There are no free liquids disposed of at the permitted coal mine.

Concentrator Decant Basins (2)

1. No potential hazard rating has been assigned to these management units/surface impoundments (units).
2. The units were commissioned in 1978 as part of the initial facility construction.
3. The units temporarily stores residues of bottom ash and FGD solids. These units do not permanently store or dispose of residuals or by-products from the combustion of coal. Solid residuals are removed, as needed, and disposed of at the permitted coal mine adjacent to the facility.
4. The units were designed by and constructed under the supervision of a Professional Engineer (P.E.). The units are inspected in accordance with industry good work practices, including daily visual inspections.
5. The units are inspected for safety (structural integrity) on a daily basis and semi-annually during the stormwater inspections by Tri-State personnel. The assigned personnel have training in industrial facilities to determine safety issues. The last stormwater inspection was conducted on September 30, 2008, and no corrective actions were necessary for this unit. The next stormwater inspection is planned for completion by July 1, 2009.
6. Due to the lack of hazard potential of the Concentrator Decant Basins, the units' safety (structural integrity) have not been inspected or evaluated by a State or Federal regulatory official within the last ten years. Tri-State is unaware of any planned State or Federal regulatory inspection or evaluation in the future.
7. No State or Federal regulatory official inspections of these units have occurred within the past year.
8. The physical dimensions of the units are as follows:
    a. Total surface area = 0.17 acres (high water level).
    b. Storage capacity = 1.03 acre-feet (high water level).

c. Volume of ash and FGD particles (approximately 10%) currently stored in the units = 0.103 acre-ft or 33,600 gallons. The volume was estimated on March 12, 2009.

d. Maximum height of the units is less than one (1) feet.

9. No known spills or unpermitted releases from the units within the last ten years.

10. Craig Station Units 1&2 are owned by the Yampa Project, a holding company composed of PacifiCorp, Platte River Power Authority, Public Service of Colorado (Xcel Energy), Salt River Project, and Tri-State, in varying percentages. Craig Station Unit 3 is wholly owned by Tri-State. Tri-State is the operator of all three units of Craig Station at the above described management units.