

US EPA ARCHIVE DOCUMENT



TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.

HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

May 14, 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 Nucla 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 Nucla Power Station on May 6, 2009. On March 25, 2009, Tri-State notified the EPA of the Nucla 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 Nucla 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 beneficial reuse (e.g., material substitution for construction activities), or placed in a regulated landfill.

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

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CRAIG STATION
P.O. BOX 1307
CRAIG, CO 81626-1307
970-824-4411

ESCALANTE STATION
P.O. BOX 577
PREWITT, NM 87045
505-876-2271

NUCLA STATION
P.O. BOX 698
NUCLA, CO 81424-0698
970-864-7316

US EPA ARCHIVE DOCUMENT



Mr. Richard Kinch
May 14, 2009
Page 2

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

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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.

Nucla Station

("Nucla Power Station" as described in the RFI)

The Nucla Power Station 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 12% of the ash generated at the facility is sold for beneficial reuse (bottom ash is typically used for cement). The remaining ash and residual by-products are disposed of at a permitted off-site landfill. There are no free liquids disposed of at the landfill. The landfill is regulated by the Colorado Department of Public Health and Environment.

Coal/Ash Settling Basin

1. No potential hazard rating has been assigned by any federal or state agency to this management unit/surface impoundment (unit).
2. The unit was commissioned in 1997 as part of a facility water system upgrade.
3. The unit temporarily stores residues of coal, fly ash and bottom ash collected in the ash and coal handling area. This unit does not permanently store or dispose of residuals or by-products from the combustion of coal. Solid residuals are removed weekly, at a minimum, following dewatering and disposed of at the off-site landfill.
4. The unit was designed by and constructed under the supervision of a Professional Engineer (P.E.). The unit is inspected in accordance with industry good work practices, including routine facility inspections.
5. The unit is inspected for safety (structural integrity) semi-annually during the stormwater inspections by Tri-State personnel. The assigned personnel have Bachelor's degree(s) in science or engineering, or equivalent, plus several years of experience with industrial facilities. The last inspection was conducted on September 23, 2008, and no corrective actions were necessary for this unit. The next inspection is planned for completion by October 1, 2009.
6. Ms. Jocelyn Mullen, P.E. of the Colorado Department of Public Health and Environment, Water Quality Control Division inspected the unit as part of the CDPS permit inspection on November 19, 2007. Tri-State is not aware of any planned state or federal inspection or evaluation in the future. Attachment A includes a copy of the 2007 inspection report.
7. No State or Federal regulatory official inspections of the unit have occurred within the past year.
8. The physical dimensions of the unit are as follows:

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.

Nucla Station

("Nucla Power Station" as described in the RFI)

- a. Total surface area = 0.02 acres (high water level).
 - b. Storage capacity = 0.13 acre-feet (high water level).
 - c. Volume of coal and ash particles (approximately 10%) currently stored in the unit = 0.013 acre-ft or 4,400 gallons. The volume was estimated on March 12, 2009.
 - d. Maximum height of the unit is less than one (1) feet.
9. No known spills or unpermitted releases from the unit within the last ten years.
 10. Tri-State is the legal owner and operator of Nucla Station and this unit.