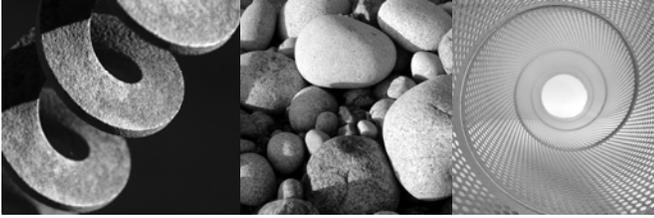


US EPA ARCHIVE DOCUMENT



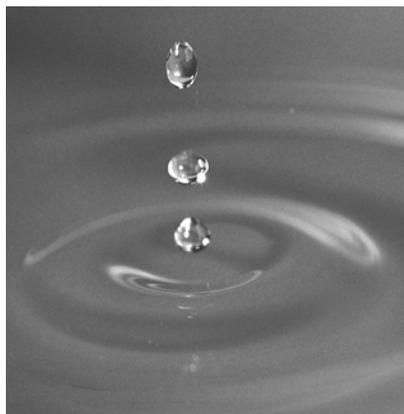
Geotechnical
Environmental and
Water Resources
Engineering

**Comments On:
Specific Site Assessment Report
Tri-State Generation and
Transmission Association
Escalante Generating Station**

Submitted to:
Lockheed-Martin Corporation
2890 Wood Bridge Avenue
Building 209 BAYF
Edison, NJ 08837

Submitted by:
GEI Consultants, Inc.
6950 South Potomac Street, Suite 300
Centennial, CO 80112

July 2009
Project 091330



Brian S. Johnson, P.E.
Senior Project Engineer

EPA's Comments

No Comments for the Tri-State Escalante Station were received from the EPA.

State's Comments

From: "Miller, Dennis A" <dennis.a.miller@lmco.com>
To: "Stephen G. Brown" <sbrown@geiconsultants.com>, "Killeen, Deborah A" <de...>
CC: "Hoffman.Stephen@epa.gov" <Hoffman.Stephen@epa.gov>, "Kohler.James@epama...>
Date: 8/24/2009 10:21 AM
Subject: FW: State Comment on Tri-State Escalante Report

Steve: The State comment for the draft Tri-State G&I assessment report is provided below.

-----Original Message-----

From: Kohler.James@epamail.epa.gov [mailto:Kohler.James@epamail.epa.gov]
Sent: Monday, August 24, 2009 10:16 AM
To: Miller, Dennis A; Killeen, Deborah A
Cc: Hoffman.Stephen@epamail.epa.gov
Subject: State Comment on Tri-State Escalante Report

Dennis and Deb:

Please see the state comment on the Tri-State report attached. There is just one correction that needs to be made on page 5:

>The Bottom Ash Pond was inspected by Bryan Danielson, NM OSE, on June 2, 2009.

Ultimately, we would like to include all original comments (EPA/state/facility) in a separate appendix in the Final Report. EPA will prepare a response to comments page which will be placed in front of the original comments in the Appendix.

If you have any questions or concerns with these directions please feel free to call me or Steve. Thanks!

Jim Kohler, P.E.
Environmental Engineer
LT, U.S. Public Health Service
U.S. Environmental Protection Agency
Office of Resource Conservation and Recovery
Phone: 703-347-8953
Fax: 703-308-8433

----- Forwarded by James Kohler/DC/USEPA/US on 08/24/2009 08:33 AM -----

|----->
| From: |
|----->

>-----|
|Jim Kohler <jimkohler@lifetime.oregonstate.edu>
|

>-----|
|----->
| To: |
|----->

>-----|
 |James Kohler/DC/USEPA/US@EPA
 |
 >-----|
 |----->
 |Date: |
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 |08/21/2009 05:10 PM
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 |----->
 |Subject: |
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 |Fwd: Tri-State Escalante Report
 |
 >-----|

----- Forwarded message -----
 From: Danielson, Bryan, OSE <Bryan.Danielson@state.nm.us>
 Date: Fri, Aug 21, 2009 at 5:07 PM
 Subject: RE: Tri-State Escalante Report
 To: Jim Kohler <jimkohler@lifetime.oregonstate.edu>
 Cc: "Pacheco, Elaine, OSE" <elaine.pacheco@state.nm.us>

Jim,
 Regarding the draft report for the Escalante Generating Station, I have no comment other than to note that the Bottom Ash Pond was inspected by me on June 2, 2009 (see the reference on the bottom of page 5).

The draft for the Four Corners station was given to Sushil Chaudhary with our office. With his current workload, it will probably be a few weeks before he can respond.

Feel free to call me with any additional questions or concerns you may have.

Bryan Danielson
 NM Dam Safety Bureau
 505-827-6143

From: kohler.jim@gmail.com [mailto:kohler.jim@gmail.com] On Behalf Of

Jim Kohler
Sent: Thursday, August 20, 2009 2:20 PM
To: Danielson, Bryan, OSE
Subject: Tri-State Escalante Reports

Bryan,

Try this.

--

Jim Kohler
jimkohler@lifetime.oregonstate.edu

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Jim Kohler
jimkohler@lifetime.oregonstate.edu

Tri-State's Comments



TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.

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

August 7, 2009

Mr. Stephen Hoffman
Office of Resource Conservation and Recovery (5304P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Submitted also via electronic mail

RE: Comments on the Site Assessment Report for the Escalante Station

Dear Mr. Hoffman:

Tri-State Generation and Transmission Association, Inc. (Tri-State) has reviewed the *Draft Specific Site Assessment Report Tri-State Generation and Transmission Escalante Generating Station* (hereafter called the Report) received on July 29, 2009. We appreciate the opportunity to comment on the Report, and believe it accurately reflects the operations at the Escalante Station. We also support the conclusions reached in the report.

Our only comment is in regards to the notation made for several of the ponds in the Field Assessment Portion of the Report (Section 4). Specifically, Sections 4.2 and 4.5 (Evaporation Pond 1A and 1B and Evaporation Ponds 2, 3, 4, and 5, respectively) state "While there is administrative convenience in the New Mexico Office of the State Engineer (NM OSE) hazard classification approach, there may be value in assessing the hazard classification for each cell individually....the significant hazard rating of Pond 1A & 1B [Section 4.2] and Ponds 2, 3, and 4 [Section 4.5] appears to be inconsistent with the low hazard rating assigned to the North and South Bottom Ash Ponds by the NM OSE." Section 4.4 (North and South Bottom Ash Ponds) of the report states, "The North and South Bottom Ash Ponds are classified as low hazard by the NM OSE. This classification appears to be appropriate based on available information."

During the EPA assessment, representatives from GEI Consultants voiced their opinion that Evaporation Ponds 1A, 1B, 2, 3, and 4 should most likely be classified with a "low" hazard rating as opposed to the "significant" hazard rating currently designated by NM OSE. Although the report mentions the inconsistency, it does not clearly convey the message that the ponds may be "over-classified" as opposed to "under-classified." As a result, we recommend incorporating additional language that clarifies the "inconsistent" hazard rankings for Evaporation Ponds 1A, 1B, 2, 3, and 4.



Mr. Stephen Hoffman
August 7, 2009
Page 2

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
Don Russell