

US EPA ARCHIVE DOCUMENT



March 23, 2009

Mr. Richard Kinch  
US Environmental Protection Agency (5306P)  
1200 Pennsylvania Avenue, NW  
Washington DC

RE: Request for Information Under Section 104© of the Comprehensive Environmental Response, Compensation, and Liability Act 42 U.S.C. 9604©

Dear Mr. Kinch:

Two letters dated March 9, 2009 from Lisa P. Jackson, Administrator of the United States Environmental Protection Agency (EPA) were received by Western Farmers Electric Cooperative (WFEC) on March 13, 2009. One letter was addressed to the Chief Executive Officer of WFEC and the other letter was address to WFEC's Hugo plant manger. This correspondence responds to both EPA letters.

Each EPA letter contained 10 questions requesting information regarding surface impoundments or diked/bermed management units designed for storage or disposal of residual products from the combustion of coal. WFEC's answers to the questions presented in EPA's letters dated March 9, 2009 are reflected in attachment "A" hereto. The attached drawings indicate the dimensions of the storage impoundments. A recent inspection report from the Oklahoma Department of Environmental Quality is also attached.

In its letter to WFEC's Chief Executive Officer, EPA also requested information about additional facilities in WFEC's system that have surface impoundments or similar diked/bermed management units that store or dispose of coal combustion by products.. The Hugo plant is the only facility in WFEC's system that has surface impoundments or diked/bermed management units.

Sincerely

  
Gary R. Roulet  
Chief Executive Officer

Cc: Brian Hobbs  
Gary Gilleland  
Charles Collier  
File

A Powerful Friend to:

Aftalfa Electric Cooperative - Altus Air Force Base - Caddo Electric Cooperative - Canadian Valley Electric Cooperative - Choctaw Electric Cooperative - Cimarron Electric Cooperative  
Cotton Electric Cooperative - East Central Oklahoma Electric Cooperative - Harmon Electric Association - Kay Electric Cooperative - Kiamichi Electric Cooperative  
Kwawash Electric Cooperative - Northfork Electric Cooperative - Northwestern Electric Cooperative - Oklahoma Electric Cooperative - People's Electric Cooperative  
Red River Valley Rural Electric Association - Rural Electric Cooperative - Southeastern Electric Cooperative - Southwest Rural Electric Association

**Attachment "A" to WFEC response to EPA Letter request dated March 9, 2009.**

Each EPA request is listed below followed by WFEC's response.

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 units(s). If the unit(s) does not have a rating, please note that fact.

**There have been no ratings assigned to any management units at the facility in question.**

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

**The management units were commissioned when the generation unit went into commercial operation April, 1982. The management units have never 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).

**Fly Ash is stored in two of the management units which are permitted as a landfill with the Oklahoma Department of Environmental Quality ("ODEQ").**

**Bottom ash is stored in two management units on the plant site. This management unit is not permitted as a landfill. It is permitted as a flow through impoundment on the facilities NPDES permit.**

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 waster management unit(s) under the supervision of a Professional Engineer?

**The management units were designed in 1978 by Michael Meyer with Burns & MacDonnell Engineering. The design and construction was under the supervision of R.D. Sands, PE. Inspections or monitoring of the safety of the waste management units are not supervised by a professional engineer. However plant operations staff inspects these units routinely.**

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?

**The management units were last inspected on January 22, 2009 by plant manager, Charles Collier, and WFEC's environmental coordinator, Gerald Butcher who is a Registered Environmental Manager (REM 03040), and environmental specialist, Kent Fletcher who is a Registered Environmental Manager (REM 05187). No safety issues were identified. The management units are also inspected routinely by plant staff.**

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 and 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 management units were last inspected by ODEQ on March 10, 2009. The units are inspected on an unannounced quarterly basis by ODEQ. ODEQ's March 10, 2009 inspection report is attached.**

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

**There have been no safety issues identified as a result of ODEQ inspections conducted within the past year.**

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.

**The area of each of the two management units for Fly Ash is 17.6 surface acres (total = 35.2 acres) and these units are 24 feet deep. On March 12, 2009, it was estimated that the amount of fly ash in the unit is approximately 154,000 tons with a remaining storage capacity of 876,406 tons. The total capacity is approximately 1,030,406 tons. These units are only used for flyash containment**

**The area for each of the two management units for the Bottom Ash is 34 acres (total = 68 acres). These units have a depth of 16 feet. The estimated holding capacity is 1,600,000 tons of bottom ash. On March 12, 2009 it was estimated that the amount of bottom ash in these units is 386,015 tons, with a remaining storage capacity of 1,213,985 tons.**

**The maximum height of the flyash units are 30 feet and 27 feet. The maximum height of each bottom unit is 11 feet.**

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).

**There have been no spills related to any ash management unit.**

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

**Western Farmers Electric Cooperative  
P. O. box 429  
Anadarko, OK 73005**

### North Fly Ash

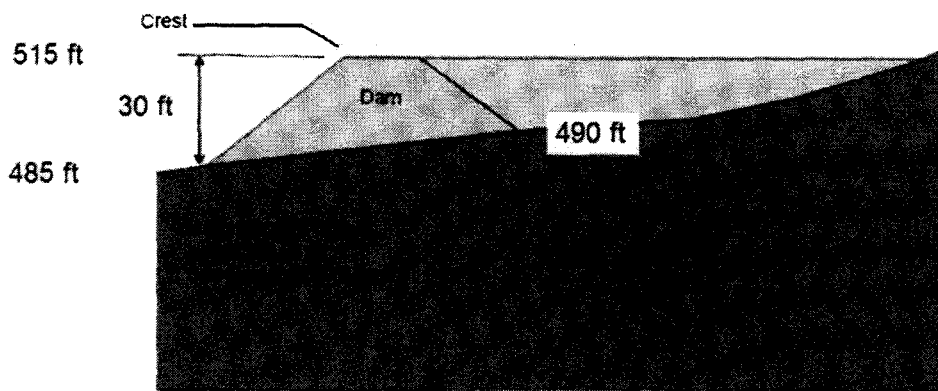


Figure 1

### South Fly Ash

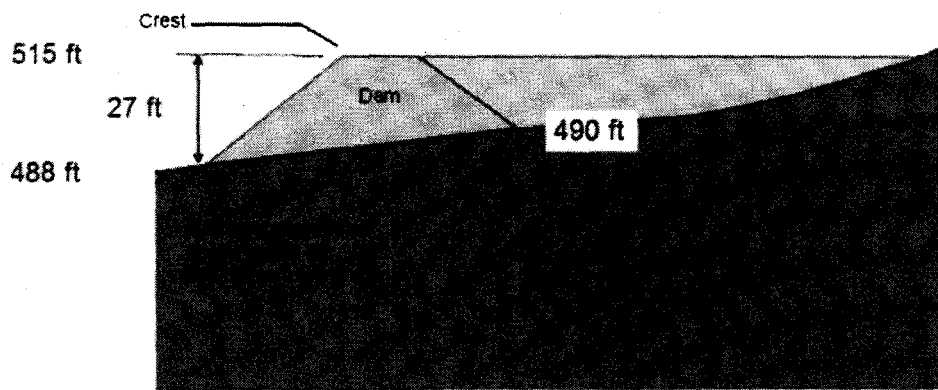


Figure 2



### North Bottom Ash

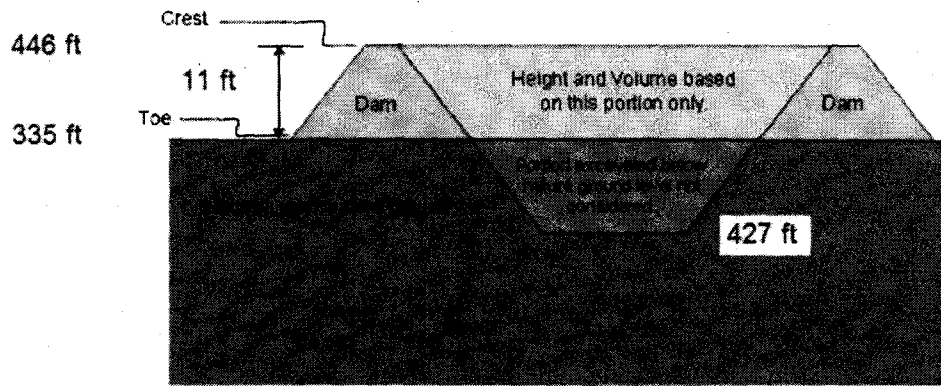


Figure 3

### South Bottom Ash

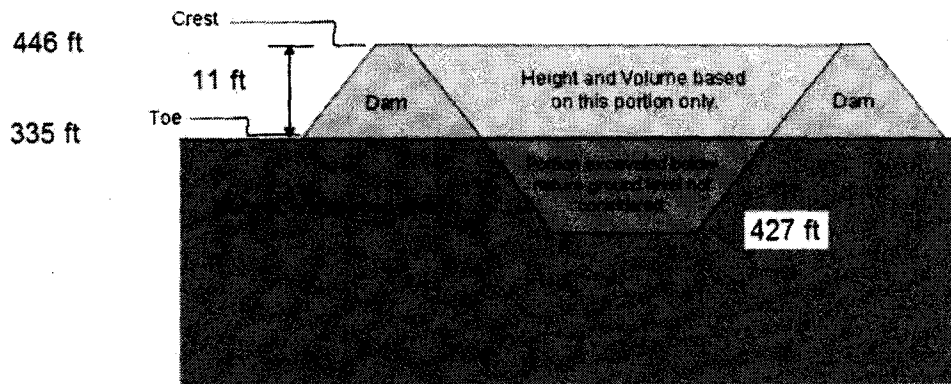


Figure 4

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 of the attachments were prepared in accordance with a method 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 method, 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 Gary Ray Roulet

Name: Gary R. Roulet

Title: Chief Executive Officer