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March 23, 2009

Mr. Richard Kinch  
US Environmental Protection Agency  
Two Potomac Yard  
2733 South Crystal Drive  
5<sup>th</sup> Floor; N-5783  
Arlington, VA 22202 2733

Dear Mr. Kinch,

Subject: Response to CERCLA §104(e) Information Collection Request  
Intermountain Power Project, Delta, UT

As Operating Agent of Intermountain Power Project (IPP), located in Delta, Utah, the Los Angeles Department of Water & Power (LADWP) is herein providing required information in response to Environmental Protection Agency's (EPA) Information Collection Request (ICR) on impounded management units used for coal combustion byproducts. Your CERCLA §104(e) ICR of March 9, 2009, was received by the IPP on March 13, 2009.

There are thirteen management units at the IPP to which this ICR is applicable:

<u>Management Unit(s)</u>	<u>Type</u>
Settling Basin (one)	Intermediate storage
Bottom Ash Basins (three)	Permanent ash disposal and intermediate water storage
Ash Water Recycle Basin (one)	Intermediate storage
Wastewater Holding Basin (one)	Intermediate storage
Evaporation Ponds (six)	Permanent disposal
Landfill Run-Off Basin (one)	Permanent disposal

The information requested was compiled by the Intermountain Power Service Corporation (IPSC), which operates the plant. Answers to the specific questions contained within the request are in Enclosure 1. Documentation specifically requested to support Question No. 6 is provided in Enclosure 2. Other supporting documentation

### Water and Power Conservation ... a way of life

111 North Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles 90051-5700  
Telephone: (213) 367-4211 Cable address: DEWAPOLA


Mr. Richard Kinch  
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can be found at <http://nrwrt1.nr.state.ut.us/cgi-bin/damview.exe>, by clicking "List by Dam Name", and choosing each applicable management unit under "Intermountain Power."

For clarifications to this submittal, please contact Mr. George W. Cross, IPSC President and Chief Operations Officer, at (435) 864-4414, or [george-c@ipsc.com](mailto:george-c@ipsc.com).

I am the Director of Generation for the LADWP, the Operating Agent for the IPP, and therefore have the authority to make the following certification as authorized representative for the IPP as required by the ICR:

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 upon 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.

Signed:  \_\_\_\_\_

Name: Eric J. Tharp

Title: Director of Generation

DQ/RJC:sg

Enclosures

By Federal Express

c/enc: Mr. George W. Cross – IPSC

Mr. Blaine Ipson – IPSC

Mr. Rand Crafts – IPSC



State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF WATER RIGHTS

ENCLOSURE 2

Michael O. Leavitt  
Governor  
Robert L. Morgan  
Executive Director  
Jerry D. Olds  
State Engineer

1594 West North Temple, Suite 220  
PO Box 146300  
Salt Lake City, Utah 84114-6300  
(801) 538-7240 telephone  
(801) 538-7467 fax  
www.nr.utah.gov

April 20, 2004

GEORGE W. CROSS, CHIEF OPERATIONS OFFICER  
INTERMOUNTAIN POWER SERVICE CORPORATION  
850 WEST BRUSH WELLMAN ROAD  
DELTA, UT 84624

Re: INTERMOUNTAIN POWER - BOTTOM ASH BASINS/UT00463  
INTERMOUNTAIN POWER - BOTTOM ASH RECYCLE/UT00464  
INTERMOUNTAIN POWER - EVAPORATION PONDS/UT00465  
INTERMOUNTAIN POWER - SETTLING BASIN/UT00466  
INTERMOUNTAIN POWER - STORAGE BASIN/UT00467  
INTERMOUNTAIN POWER - WASTEWATER/UT00468

A field inspection of the above-referenced dams was completed on April 14, 2004, with the following in attendance:

<u>NAME</u>	<u>REPRESENTING</u>
Terry Monroe	Division of Water Rights
Blain Ipson	Owner's Representative

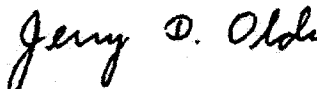
Based on our visual observation of the dam and appurtenant facilities, we have observed some items which need attention to ensure the satisfactory long-term operation of the facilities:

1. Several burrowing rodents were observed on the Wastewater embankment. These rodents should be eradicated.
2. Erosion gullies have formed on several areas of the downstream face of the embankments. The most notable area is at the southwest corner of the evaporation ponds. It appears that this is a result of the crest being graded to drain to the downstream side in these areas. The crest of the embankments should be graded with a slight slope so that they drain to the upstream side into the basin.

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Intermountain Power  
April 20, 2004

Your cooperation is appreciated. If you have any questions, please feel free to contact Kirk Forbush at (435) 896-4429.

Sincerely,



Jerry D. Olds, P.E.  
State Engineer

JDO/tm

pc: Kirk Forbush - Water Rights Regional Engineer  
Director Millard County Emergency Services

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**QUESTION #1**

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.

ICR Question	Settling Basin	Bottom Ash Basins	Ash Water Recycle Basin	Wastewater Holding Basin	Evaporation Ponds	Landfill Run-off Basin
1.a. Please provide the potential hazard rating for each management unit	LOW	LOW	LOW	LOW	LOW	Not Rated
1.b. Indicate who established the rating	Utah Department of Natural Resources	Utah Department of Natural Resources	Utah Department of Natural Resources	Utah Department of Natural Resources	Utah Department of Natural Resources	n/a
1.c. Basis for the rating	No potential for probable loss of human life, high economic loss, or environmental loss	No potential for probable loss of human life, high economic loss, or environmental loss	No potential for probable loss of human life, high economic loss, or environmental loss	No potential for probable loss of human life, high economic loss, or environmental loss	No potential for probable loss of human life, high economic loss, or environmental loss	Does not exceed 25 feet in height, does not exceed 50 acre feet (af)
1.d. Agency regulating the unit	Utah Department of Natural Resources	Utah Department of Natural Resources	Utah Department of Natural Resources	Utah Department of Natural Resources	Utah Department of Natural Resources	Utah Department of Natural Resources

NOTE: For additional information for these IPP ponds, please refer to <http://ncwt1.nrc.state.ut.us/cgi-bin/damview.exe>, and click "List by Dam Name", and choose each unit under "Intermountain Power."

**QUESTION #2**

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

ICR Question	Settling Basin	Bottom Ash Basins	Ash Water Recycle Basin	Wastewater Holding Basin	Evaporation Ponds	Landfill Run-off Basin
2. What year was each management unit commissioned and expanded?	1983	1986	1986	1986	1986	1986

**QUESTION #3**

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).

ICR Question	Settling Basin	Bottom Ash Basins	Ash Water Recycle Basin	Wastewater Holding Basin	Evaporation Ponds	Landfill Run-off Basin
3. What materials are temporarily or permanently contained in the unit?	Flue gas emission control residuals; OTHER (incl. wash down, coal pile run-off, boiler blowdown, cooling tower blowdown, regenerant rinsate, stormwater collection, building/structure drains)	Bottom ash; boiler slag; OTHER (incl. pulverizer rejects, chemical clean residue)	OTHER (incl. leachate from bottom ash, boiler slag, pulverizer rejects)	Flue gas emission control residuals; OTHER (incl. all process waters separated for re-use: wash down, coal pile run-off, boiler blowdown, cooling tower blowdown, regenerant rinsate, leachate from bottom ash, boiler slag, pulverizer rejects)	OTHER (incl. all pond water sources as described for WW Holding Basin, and treated sewage plant effluent)	OTHER (incl. leachate and run-off from combustion by-products landfill which consists of fly ash, flue gas emission control residues, bottom ash, boiler slag, pulverizer rejects)

**Intermountain Power Service Corporation Response to EPA March 9, 2009 Request for Information Under CERLCA §104(e)**

**QUESTION #4**

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?

<b>ICR Question</b>	<b>Settling Basin</b>	<b>Bottom Ash Basins</b>	<b>Ash Water Recycle Basin</b>	<b>Wastewater Holding Basin</b>	<b>Evaporation Ponds</b>	<b>Landfill Run-off Basin</b>
4.a. Was the management unit(s) designed by a Professional Engineer?	YES	YES	YES	YES	YES	YES
4.b. Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer?	YES	YES	YES	YES	YES	YES
4.c. Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?	YES	YES	YES	YES	YES	YES

NOTE: For supporting documentation on these IPP ponds, please refer to <http://nrcvt.ltr.state.ut.us/cgi-bin/damview.exe>, and click "List by Dam Name", and choose each unit under "Intermountain Power."

**Intermountain Power Service Corporation Response to EPA March 9, 2009 Request for Information Under CERLCA §104(e)**

**QUESTION #5**

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?

<b>ICR Question</b>	<b>Settling Basin</b>	<b>Bottom Ash Basins</b>	<b>Ash Water Recycle Basin</b>	<b>Wastewater Holding Basin</b>	<b>Evaporation Ponds</b>	<b>Landfill Run-off Basin</b>
5.a. When did the company last assess or evaluate the safety of the management unit(s)?	Spring, 2008	Spring, 2008	Spring, 2008	Spring, 2008	Spring, 2008	Spring, 2008
5.b. Describe the credentials of those conducting the structural integrity assessments/evaluations	Environmental Engineer	Environmental Engineer	Environmental Engineer	Environmental Engineer	Environmental Engineer	Environmental Engineer
5.c. Describe the credentials of those performing the corrective actions	Plant Operations Supervisor, Plant Engineer (employees) HDPE Liner Repair Personnel (contractor)	Plant Operations Supervisor, Plant Engineer (employees) HDPE Liner Repair Personnel (contractor)	Plant Operations Supervisor, Plant Engineer (employees) HDPE Liner Repair Personnel (contractor)	Plant Operations Supervisor, Plant Engineer (employees) HDPE Liner Repair Personnel (contractor)	Plant Operations Supervisor, Plant Engineer (employees) HDPE Liner Repair Personnel (contractor)	Plant Operations Supervisor, Plant Engineer (employees) HDPE Liner Repair Personnel (contractor)
5.d. When is the next assessment expected to occur?	Spring, 2009	Spring, 2009	Spring, 2009	Spring, 2009	Spring, 2009	Spring, 2009

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**QUESTION #6**

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.

<b>ICR Question</b>	<b>Settling Basin</b>	<b>Bottom Ash Basins</b>	<b>Ash Water Recycle Basin</b>	<b>Wastewater Holding Basin</b>	<b>Evaporation Ponds</b>	<b>Landfill Run-off Basin</b>
6.a. When did a State or a Federal regulatory official last inspect or evaluate the safety of the management unit(s)?	April, 2004	April, 2004	April, 2004	April, 2004	April, 2004	Never
6.b. If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur?	2009 (every 5 years)	2009 (every 5 years)	2009 (every 5 years)	2009 (every 5 years)	2009 (every 5 years)	Not expected
6.c. Please identify the regulatory agency or department which conducted or is planning the inspection or evaluation.	State of Utah Department of Natural Resources, Utah Division of Water Rights	State of Utah Department of Natural Resources, Utah Division of Water Rights	State of Utah Department of Natural Resources, Utah Division of Water Rights	State of Utah Department of Natural Resources, Utah Division of Water Rights	State of Utah Department of Natural Resources, Utah Division of Water Rights	n/a
6.d. Please provide a copy of the most recent official inspection report or evaluation.	Enclosed (See DNR/DWR Inspection letter of April20, 2004)	Enclosed (See DNR/DWR Inspection letter of April20, 2004)	Enclosed (See DNR/DWR Inspection letter of April20, 2004)	Enclosed (See DNR/DWR Inspection letter of April20, 2004)	Enclosed (See DNR/DWR Inspection letter of April20, 2004)	n/a

NOTE: For additional information for these IPP ponds, please refer to <http://nrwr1.nr.state.ut.us/cgi-bin/damview.exe>, and click "List by Dam Name", and choose each unit under "Intermountain Power."

**QUESTION #7**

7. Have assessments or evaluations, or inspections conducted by State or Regulatory officials conducted within the last 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.

<b>ICR Question</b>	<b>Settling Basin</b>	<b>Bottom Ash Basins</b>	<b>Ash Water Recycle Basin</b>	<b>Wastewater Holding Basin</b>	<b>Evaporation Ponds</b>	<b>Landfill Run-off Basin</b>
7.a. Have evaluations conducted within the last year uncovered a safety issue with the management unit(s)?	No safety issues	No safety issues; minor maintenance items only	No safety issues; minor maintenance items only	No safety issues; minor maintenance items only	No safety issues; minor maintenance items only	No safety issues; minor maintenance items only
7.b. Describe the actions taken	n/a	Liner repair, embankment run-off erosion fill	Liner repair, embankment run-off erosion fill	Liner repair	Liner repair	Liner repair
7.c. Provide documentation	N/A – no safety issues	N/A – no safety issues	N/A – no safety issues	N/A – no safety issues	N/A – no safety issues	N/A – no safety issues

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**QUESTION #8**

8. What is the surface area (acres) and total storage capacity of each of the management unit(s)? 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 is explained later in this Enclosure.

<b>ICR Question</b>	<b>Settling Basin</b>	<b>Bottom Ash Basins</b>	<b>Ash Water Recycle Basin</b>	<b>Wastewater Holding Basin</b>	<b>Evaporation Ponds</b>	<b>Landfill Run-off Basin</b>
8.a. What is the surface area (acres) of each of the management unit(s)?	14 acres	105 acres (three ponds at 35 acres each)	27 acres	53 acres	180 acres (Six ponds @ 30 acres each)	5 acres
8.b. What is the total storage capacity of each of the management unit(s)?	145 af	3000 af (three ponds at 1000 af each)	590 af	650 af	3225 af (Six ponds at approx. 540 af each, average)	30 af
8.c. What is the volume of materials currently stored in each of the management unit(s)?	103 af	1590 af	321 af	551 af	2077 af	Empty
8.d. Please provide the date that the volume measurement(s) was taken.	3/2/2009	3/2/2009	3/2/2009	3/2/2009	3/2/2009	3/13/09
8.e. Please provide the maximum height is explained later in this Enclosure.	7 ft	36 ft	27 ft	15 ft	23 ft	8 ft

NOTE: For construction drawings for these IPP ponds, please refer to <http://nrcwtl.nrc.state.ut.us/cgi-bin/damview.exe>, and click "List by Dam Name", and choose each unit under "Intermountain Power."

**Intermountain Power Service Corporation Response to EPA March 9, 2009 Request for Information Under CERLCA §104(e)**

**QUESTION #9**

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).

<b>ICR Question</b>	<b>Settling Basin</b>	<b>Bottom Ash Basins</b>	<b>Ash Water Recycle Basin</b>	<b>Wastewater Holding Basin</b>	<b>Evaporation Ponds</b>	<b>Landfill Run-off Basin</b>
9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years	NONE	NONE	NONE	NONE	NONE	NONE

**QUESTION #10**

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

Owner: Intermountain Power Agency  
10653 S. River Front Parkway, Suite 120  
South Jordan, UT 84095

Operating Agent: Los Angeles Department of Water & Power  
111 Hope St  
Los Angeles, CA 90012

Operating Company: Intermountain Power Service Corp  
850 W. Brush Wellman Rd  
Delta, UT 84624