



**Stantec Consulting Services  
Inc.**

2890 East Cottonwood  
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City UT 84121-7283

April 6, 2018

File: JB-LT-002

Reference: Jim Bridger Power Plant Flue  
Gas Desulfurization Pond 1  
Documentation of Hazard Potential  
Classification Assessment Compliance

Attention: Jeff Tucker

PacifiCorp Energy

1407 W. North Temple, Suite 210

Salt Lake City, Utah 84116

Dear Mr. Tucker,

This letter provides a description of compliance and an explanation for the inapplicability of hazard potential classification assessment documentation due to the closure status of the Jim Bridger Power Plant Flue Gas Desulfurization (FGD) Pond 1 (the Pond). Under the original version of the Coal Combustion Residuals rule, inactive surface impoundments that were closed in accordance with the rule prior to April 17, 2018 were exempted from the rest of the requirements of the rule. This exemption was subsequently removed from the rule as a result of litigation. However, Section 257.100 does not take into account inactive surface impoundments that are partially or mostly closed in accordance with the rule.

In anticipation of the aforementioned exemption for closed surface impoundments, the Pond was removed from service and ceased receiving FGD discharges from the Jim Bridger Power Plant's scrubbers on 2003. A letter of intent to initiate closure per the requirements of §2547.100[c][1] was submitted to the Wyoming Department of Environmental Quality on December 9, 2015. Closure activities in accordance with section 257.102 commenced in the Fall of 2016 and have to date consisted of installation and operation of a dewatering system and placement of soil to form the subgrade for the overlying engineered cover system to be installed in the Summer and Fall of 2018.

Given the current status of the Pond (i.e. inactive and partially closed), it is in the opinion of Chad Tomlinson (registered Professional Engineer in Wyoming) that it should no longer be considered a surface impoundment and that the Pond should be characterized as a low hazard. Therefore, the requirements of §257.73(a),(2) have been met.

Closing,

**Chad Tomlinson, P.E., PMP**

Principal Engineer

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