

Stantec Consulting Services Inc.

2890 East Cottonwood
Parkway Suite 300, Salt Lake
City UT 84121-7283

April 6, 2018

File: JB-LT-003

Reference: Jim Bridger Power Plant Flue
Gas Desulfurization Pond 1
Documentation of Initial Inflow Design
Flood Control Plan 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 inflow design control flood control system 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 in 2003. A letter of intent to initiate closure per the requirements of §257.100[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 an engineered cover system.

As part of the Closure Plan for the Pond (MWH, 2015), the requirements for stormwater infrastructure to prevent run-on (inflow) from surrounding topography into the Pond were evaluated. As part of the analysis stormwater channels were designed to both prevent run-on as well as runoff from the cap. In addition, there is an existing ditch that was constructed as part of the original construction of the Pond to capture stormwater runoff from the surrounding areas. Therefore, based on the information presented above the requirements of §257.82(c) are no longer applicable.

Closing,

Chad Tomlinson, P.E., PMP

Principal Engineer

Phone: 801 617-3390

Fax: 801 617-4200

chad.tomlinson@stantec.com



References:

MWH, 2015. Naughton Power Plant FGD Pond 1 Closure Plan. Dated September, 2015