

Association of State Dam Safety Officials

Board of Directors and State Representatives
Resolution Number 1-2010

WHEREAS, failure of a Coal Combustion Residuals (CCRs) storage impoundment at Kingston, Tennessee caused property damage and major adverse environmental consequences, and

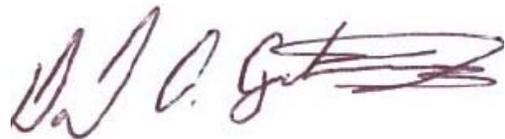
WHEREAS, the design, construction, inspection, maintenance, hazard potential, emergency action planning, and security are factors to consider with CCRs storage, and

WHEREAS, due to the potential damage posed by CCRs impoundments nationwide, the U. S. Environmental Protection Agency (USEPA) is considering regulations to establish regulatory oversight of CCRs impoundments, and

WHEREAS, state dam safety programs may administer CCRs regulatory programs and state dam safety programs may be impacted by the proposed USEPA regulations,

NOW THEREFORE BE IT RESOLVED, by the Board of Directors and the State Representatives of the Association of State Dam Safety Officials, meeting on September 22, 2010, that the Association of State Dam Safety Officials, expresses support for the following positions in response to USEPA request for comments:

- USEPA should acknowledge state dam safety program primacy over CCRs dam regulation where state regulation exists
- USEPA dam safety regulation should include hazards to the downstream public
- USEPA should adopt FEMA hazard potential guidelines
- USEPA should require emergency action planning in accordance with FEMA guidelines
- USEPA should adapt specific safety standards equal to the Federal Guidelines for Dam Safety



David Gutierrez
President

October 5, 2010

Date

