

US EPA ARCHIVE DOCUMENT



American Electric Power
1 Riverside Plaza
Columbus, OH 43215-2373
AEP.com

Mr. Richard Kinch
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Dr.
5th Floor; N-5783
Arlington, VA 22202-2733

RE: Request for Information Under CERCLA Section 104(e) for Ash Management Units

March 31, 2009

Dear Mr. Kinch:

The enclosed package constitutes the consolidated response of the affected subsidiary companies of American Electric Power Company, Inc. (AEP) to U.S. EPA's request for information relating to the surface impoundments or similar diked or bermed management unit(s) or management units designated as landfills which receive liquid-borne material from a surface impoundment used for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals. As agreed during your discussion on March 25, 2009 with Alan R. Wood of my staff, we are providing a consolidated response for all of the affected AEP System power plants. A total of 18 AEP System power plants received EPA's survey request. In addition to the responses for those plants, EPA has requested, through a letter to our corporate office, that we identify and furnish a list of any additional facilities to whom an information request was not sent, but which have similar management units. We have elected to not only identify those facilities, but also are voluntarily providing survey responses. Therefore, you will find information regarding the following plants:

- | | |
|----------------------|-------------------------------|
| · John E. Amos (WV) | · Picway (OH) |
| · Kanawha River (WV) | · General James M. Gavin (OH) |
| · Philip Sporn (WV) | · Kammer (OH) |
| · Mountaineer (WV) | · Mitchell (OH) |
| · Glen Lyn (VA) | · Muskingum River (OH) |
| · Cardinal (OH) | · Tanners Creek (IN) |
| · Conesville (OH) | · Rockport (IN) |

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- Big Sandy (KY)
- Flint Creek (AR)
- Oklaunion (TX)
- Pirkey (TX)

Northeastern 3&4 –
(Did not receive request)
P.O. Box 220
Oologah, OK 74053-0220

Clinch River –
(Did not receive request)
P.O. Box 157
Cleveland, VA 24225-0157

Welsh –
(Did not receive request)
1187 County Road 4865
Pittsburg, TX 75686

To facilitate our response, we have provided our answers in spreadsheet form with a clear linkage to each of the questions and sub-questions contained in EPA's request. Enclosed you will find: 1) a printed copy of each plant's response, 2) a Compact Disc containing a Microsoft Excel file with the same worksheet responses for each plant, and 3) a printed copy of each supporting document identified in those responses.

For clarification, as indicated in the responses for several plants, ash is regularly excavated from the impoundments for subsequent dry disposal in our licensed coal combustion product landfills. This ash is disposed in those landfills at optimum moisture content for compaction, in accordance with each facility's permit. We have not provided responses for those dry disposal landfills as we believe this is beyond the scope of EPA's inquiry.

Additionally, we would like to point out that at several of the plants for which we are responding, the ash ponds are listed in a manner which is consistent with the dam safety regulatory program. These are identified as ash pond "complexes" which are multi-cell systems where other power plant wastewaters are treated in contiguous cells. In addition to ash settling/storage cells and treatment cells for other power plant wastewaters, these pond complexes typically include secondary (and in some cases tertiary) settling ponds for managing water that is recycled back to the power plant and/or for final "polishing" of effluent quality. We are responding in this manner since the dam/dike around the perimeter of the complex is the physical structure that is subject to dam safety regulation.

If after reviewing these responses, EPA believes additional information is necessary, please advise and we will respond. Please contact:

Alan R. Wood, P.E.
Manager, Water & Ecological Resource Services
(614) 716-1233
arwood @ aep.com

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 on 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.

Signature: John M. McManus

Name: John M. McManus

Title: Vice President – Environmental Services