

US EPA ARCHIVE DOCUMENT



AEP Mitchell Power Plant  
Moundsville, Marshall County, West Virginia  
US EPA Inspection Final Report, December 2009  
Conner Run Fly Ash Dam and Bottom Ash Pond Complex  
Action Plan based on Final Recommendations  
January 2010

**Recommendation:**

We recommend Site personnel continue to perform required maintenance and monitoring activities at the Bottom Ash Complex as outlined by the approved Maintenance Plan. Specific locations where maintenance may be needed are noted in Sections 3.1.2 and 3.1.3. This includes maintaining vegetation control measures on both the upstream and downstream slopes of the impoundments as part of a regular maintenance routine.

**Response:**

*AEP fully understands that maintenance of the facilities is part of the actions required to ensure the integrity of the dam and dikes at the AEP facilities. Therefore, AEP will continue a proactive maintenance and monitoring program as established in our dam inspection and maintenance program (DIMP). As part of our annual maintenance program, mowing is performed at least twice a year. Mowing will be coordinated such that the visual inspections can be performed without hindrance.*

**Recommendation:**

Animal burrows should be identified and repaired as necessary to prevent potential seepage issues in the embankments.

**Response:**

*AEP will continue its Dam Inspection and Maintenance Program (DIMP). Monthly inspections of the facility are performed by Plant personnel and AEP Engineering conducts an annual inspection. If rodent holes are noted during the inspections, the holes will be filled with soil.*

**Recommendation:**

We recommend that routine maintenance be performed to control erosion along the crest and slopes of the impoundments. This includes periodic grading of the slopes to repair zone of erosion and uneven surfaces and grading of the crest to remove ruts and to promote proper drainage.

**Response:**

*AEP will continue its Dam Inspection and Maintenance Program (DIMP). Monthly inspections of the facility are performed by Plant personnel and AEP Engineering conducts a biannual inspection. If erosion areas are noted during the inspections, repairs will be performed and vegetated.*

**Recommendation:**

The upstream slope of the eastern Bottom Ash Pond should be graded and repaired for the safety of equipment operators working in the bottom ash loading/hauling area.

**Response:**

*AEP performed additional maintenance work items since the date of the inspection. This work included the regrading of the upstream slope of the eastern bottom ash pond. AEP will continue its Dam Inspection and Maintenance Program (DIMP). Monthly inspections of the facility are performed by Plant personnel and AEP Engineering conducts an annual inspection. If deficiencies are noted during the inspections, repairs will be performed to ensure the safety of all personnel.*

**Recommendation:**

AEP should monitor the wet zone at the northwest toe of the Bottom Ash pond to determine the source, since the issue has been noted in several past inspections of the facility.

**Response:**

*AEP will continue to monitor this area as part of its Dam Inspection and Maintenance Program (DIMP). Monthly inspections of the facility are performed by Plant personnel and AEP Engineering conducts a biannual inspection. AEP Engineering will evaluate any changing conditions that may be observed during the inspections.*

**Recommendation:**

The four standpipe piezometers that were installed around the Bottom Ash Complex should be kept clear and marked accordingly. We recommend a regular monitoring schedule be established for the instruments to monitor pore water levels. The piezometers should be read at a set interval and when significant changes in the pool water elevation occur.

**Response:**

*AEP will revise the Maintenance Plan to include a regular monitoring schedule of the instrumentation installed at the bottom ash pond complex. This will be completed and submitted to the WV DEP Dam Safety Section by December 2010.*