

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

December 14, 2009

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Mr. Allen Wood  
American Electric Power  
1 Riverside Plaza,  
Columbus, Ohio 43215-2373

Dear Mr. Wood,

On September 1-2, 2009 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Mountaineer facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the Mountaineer facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report .

The final report for the Mountaineer facility is enclosed. This report includes a specific rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the Mountaineer facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please explain why. Please provide a response to this request by January 15, 2010. Please send your response to:

Mr. Stephen Hoffman  
US Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman  
US Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Drive  
5<sup>th</sup> Floor, N-237  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov)

This request has been approved by the Office of Management and Budget under EPA ICR Number 2350.01.

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as "confidential" you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued ongoing efforts to ensure protection of human health and the environment.

Sincerely,  
/Matt Hale/, Director  
Office of Resource Conservation and Recovery

Enclosures

Enclosure 2  
Mountaineer Recommendations

**6.1. Immediate/Urgent Repair Recommendations**

No immediate or urgent repairs are recommended at this time.

**6.2. Long Term Improvements**

Erosion of the dike embankment crest and slope at the Turbine Room Sump Discharge into the West Bottom Ash Pond should be repaired, including measures to prevent runoff from accumulating on the crest and being channeled to this location.

The connection of the Turbine Room Sump discharge header to the junction chamber should also be restored to prevent pond slope and bottom erosion around the junction chamber.

Additional efforts should be taken to re-establish vegetation on the outboard embankment slope of the east dike where trees were recently removed.

The abandoned pipe casing penetrating the west embankment should be sealed as recommended by WVDEP and AEP corporate engineering.

The facility should consider more frequent maintenance of vegetation on the dike embankment slopes to facilitate inspection and promote a denser and more uniform vegetative cover.

**6.3. Monitoring and Future Inspection Recommendations**

Monitoring and future inspections should continue on their current schedule.

The minor crest erosion and Turbine Room Sump Discharge chamber at the West Bottom Ash Pond should be closely monitored during the monthly plant inspections.

**6.4. Time Frame for completion of Repairs/Improvements**

In the 2009 bi-annual report, AEP corporate engineering cited a November 1, 2009 completion date to seal the abandoned pipe casing penetrating the west embankment. The owner should continue toward completion of this project as planned.

For repair of the erosion and Turbine Room Sump Discharge chamber in the West Bottom Ash Pond, the West Bottom Ash Pond could be allowed to finish its annual service cycle. The repair should be completed prior to reinstating the West Bottom Ash Pond into service for its next annual cycle. Should the condition of this area be observed to significantly worsen prior to the end of the annual service cycle, the area should be repaired immediately.