

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on American Electric Power Co - Picway Generating Station,  
Lockbourne, OH  
Round 10 Draft Assessment Report

To: File

Date: March 7, 2012

1. On page i in the section “Executive Summary,” there should be inserted a pronoun, likely “in”, between the words “burrows” and “the” in the sentence describing found deficiency #2. “...minor rodent burrows in the exterior...”
2. On page 1, Section 1.1.1 “Authority” in the 4<sup>th</sup> line, Lockbourne, Ohio is misspelled “Lockburne, Ohio.”
3. On page 2, Section 1.2.2 “owner/Caretaker” in the 1<sup>st</sup> line, there should be inserted the word “by” between “operated” and “Columbus”. “owned and operated by Columbus Southern”
4. On page 3, Section 1.2.4 “Description of the Ash Pond and Appurtanances”, paragraph 5, line 2, there appears to be either a spelling or grammatical error with the sentence “No survey monuments were observed along the top of the embankment *during out site visit.*”
5. On page 13, Section 3.1 “Assessments” in deficiency #2, there appears to be the omission of a word between the words “burrows” and “the.” “rodent burrows *in the* exterior slopes...”
6. Although there appears to be a discussion in section 1.3.5 of the description of the unit and the materials in which it consists, it is requested that either in Appendix C- the checklist, or in section 1.3.5 there be a specific statement made to address the following question: “Is any part of the impoundment built over wet ash, slag, or other unsuitable materials (like TVA)?”
7. Appendix A limitations cites companies instead of AEP: Item 2 – “Dayton Power and Light Company (DP&L) (and their affiliates);” Item 6 – “Killen Electric Generating Station.” Please correct.
8. Please include pertinent studies, analyses and reports that relate to the structural stability of the impoundment .



## Comments on Draft Dam Assessment Report – Picway Plant

- June 9, 2011 -

AEP has reviewed the draft report provided by GZA GeoEnvironmental Inc. (GZA) as part of their assessment of the ash impoundment facility at the Picway Plant and would like to offer the following comments. AEP's comments are denoted in italic print after each excerpt from the GZA draft report.

### 1.2.2 Owner/Caretaker

	Dam Owner/Caretaker
Name	Columbus Southern Power Company, a subsidiary of American Electric Power, Picway Generating Station
Mailing Address	9301 U.S. Route 23
City, State, Zip	Lockbourne, Ohio 43137
Contact	Gary Zych, PE
Title	Senior Engineer (AEP)
E-Mail	<a href="mailto:grzych@aep.com">grzych@aep.com</a>
Phone Number	614-716-2917

*Please change the email address for Gary Zych from [grzych@aep.com](mailto:grzych@aep.com) to [gfzych@aep.com](mailto:gfzych@aep.com)*

*Also, Mr. Zych's current title is "Manager – Geotechnical Services", rather than Senior Engineer (AEP).*

### 1.2.4 Description of the Ash Pond and Appurtenances

*"...According to AEP personnel, no samples from the monitoring wells have been collected to date, and no water level measurement data was available."*

*AEP now has several sets of measurements of the monitoring wells if the consultant would like to review the data*

### 3.2 Studies and Analyses

GZA recommends the following studies and analyses:

1. Survey of the crest of both ponds by a licensed Professional Surveyor to evaluate the current elevation profile of the crest and confirm that survey monuments are not moving horizontally;
2. Monitor the vertical alignment of the crest of the north embankment of the Ash Pond yearly for movement or signs of embankment instability. In the event that settlement monuments are installed and surveyed in the future, survey measurements should be taken along the crest of the north embankment to ensure that the crest elevation is uniform;
3. Evaluate freeboard conditions based on maximum pool elevation and more recent topographical data; and,
4. Provide or perform spillway analysis to demonstrate capacity of discharge structures to accommodate the regulatory Spillway Design Flood with the maximum pool freeboard.
5. Camera survey of the CMP outfall should be performed.

*Study Recommendation #2: The north embankment does not have the potential to retain any water. Its vertical alignment/settlement would not impact the integrity of the overall diking system. Additionally, AEP plans to file a request to the ODNR to remove this section of dike as a regulated dike.*

*Study Recommendation #4: As noted previously in the report, the consultant reviewed AEP's hydrology and hydraulic report (Footnote #10, Page 12). Therefore, it should have been clear that AEP has completed the recommended study. The study concluded that the facility can store the design flood (0.50 PMF) without overtopping the low crest of the dike.*