

US EPA ARCHIVE DOCUMENT



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VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED

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Mr. Stephen Hoffman
US Environmental Protection Agency
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Arlington, VA 22202-2733

**RE: Plan for Addressing Recommendations in Site Assessment Reports from Dewberry,
contractor for EPA
Kentucky Utilities E.W. Brown Generating Station
Main Pond and Auxiliary Pond**

Dear Mr. Hoffman:

This is a response on behalf of Kentucky Utilities (KU) to EPA's March 8, 2010 letter requesting KU to inform you of our plans to address the recommendations in EPA's site assessment report for the E.W. Brown Generating Station Main Pond and Auxiliary Pond. Specifically, this response covers how KU intends to address the recommendations made by EPA and its engineering contractor, Dewberry, as a result of a site assessment conducted at the E.W. Brown facility on October 20, 2009. KU has reviewed the recommendations and intends to address each of the recommendations to ensure the continued stability of the CCR impoundments at the E.W. Brown facility. The attached (Table 1) identifies the specific plans and schedules for implementing each of the recommendations.

Please contact Mike Winkler at (502) 627-2338 or Michael.Winkler@eon-us.com if you have any questions regarding this response.

Sincerely,

KENTUCKY UTILITIES
Plan For Addressing Recommendations in Site Assessment Report
Kentucky Utilities – E.W. Brown Generating Station Main Pond and Auxiliary Pond

Table 1

Recommendations from EPA and Dewberry RE: E.W. Brown Plant Ash Pond Site Assessment, October 20, 2009			
Impoundment Name	Recommendation	Implementation Plan	Implementation Schedule
1 Main Pond	Update the 1991 Operations Plan prior to reopening the reconfigured Main Pond at the completion of the current phase of construction.	KU has retained the design engineer of record, MACTEC to update the operations manual.	Phase one (current phase) of construction is expected to be completed in December 2010.
2 3 4 Auxiliary Pond	Monitor isolated seepage spot.	KU has retained the design engineer of record, MACTEC to evaluate the isolated seepage spot and incorporate appropriate measures into the next construction phase of the Auxiliary Pond. The Auxiliary Pond is periodically inspected for seepage by personnel responsible for the operation and maintenance of the impoundment.	Next phase of construction expected to begin May 2010 and be completed in August 2011. Monitoring ongoing.
	Continue monitoring seepage locations.		
	Address minor erosion areas and erosion gullies.	KU plans to repair the minor erosion areas and erosion gullies beginning in May of 2010, during the next construction phase of the Auxiliary Pond. KU intends to continue to monitor these areas for erosion and make repairs as needed.	Next phase of construction expected to begin May 2010 and be completed in August 2011.