

US EPA ARCHIVE DOCUMENT



VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Mr. Richard Kinch
U.S. Environmental Protection Agency (5306P)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

John N. Voyles, Jr.
Vice President,
Transmission and
Generation Services

220 West Main Street
P.O. Box 32020
Louisville, Kentucky 40232
T (502) 627-4762
F (502) 627-4165
john.voyles@eon-us.com

March 25, 2009

RE: Response of Louisville Gas and Electric Company and Kentucky Utilities Company to Request for Information under Section 104(e) of the CERCLA

Dear Mr. Kinch:

This is a response on behalf of Louisville Gas and Electric Company (LG&E) and Kentucky Utilities Company (KU) to the requests for information from the U.S. Environmental Protection Agency (EPA) received between March 12 and March 23, 2009 by plant managers at various facilities owned and operated by the companies. In the interest of timeliness and efficiency, we are providing the requested information in one consolidated response. Specifically, this response covers requests for information sent to plant managers of the following facilities:

Louisville Gas and Electric Company

Kentucky Utilities Company

Cane Run Station
Mill Creek Station
Trimble County Station

E.W. Brown Station
Ghent Station
Green River Station
Tyrone Station

In addition to providing information on the above facilities which received individual information requests, we have also included information on KU's Pineville Station. In our March 19, 2009 response to the separate information request sent to KU's Chief Executive Officer, we identified the Pineville Station as an additional facility having a surface impoundment falling within the scope of your request. Therefore, we have included information on the surface impoundment located at the Pineville Station in order to provide EPA with complete information on our facilities. This response provides

information for surface impoundments or similar diked or bermed management units which receive liquid-borne materials as specified in EPA's information requests. None of the companies' landfills fall within the scope of EPA's information requests, so no information has been provided on those facilities. It was necessary for the companies to review voluminous information for multiple facilities over a broad timeframe in order to respond to the questions posed by EPA. We have used our best efforts to provide the most complete response possible under the significant time constraints imposed by EPA. However, in some instances, our review is ongoing and our responses may be supplemented to the extent that we subsequently identify additional information that allows us to provide a more complete response.

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.

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

Sincerely,



John N. Voyles Jr.

Question No. 1

- Q1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the
- Potential hazard rating for each management unit and
 - Indicate who established the rating,
 - What the basis of the rating is, and
 - What Federal or State agency regulates the unit(s).
 - If the unit(s) does not have a rating, please note that fact.
- A1. For impoundment facilities defined as “Dams” by the Commonwealth of Kentucky, dam classifications are established in accordance with regulations established by the Kentucky Department for Environmental Protection, Division of Water, Dam Safety and Floodplain Compliance Section of the Water Infrastructure Branch (hereinafter KDEP). A Dam is defined by KRS Chapter 151 as any structure that is 25 feet in height, measured from the downstream toe to the crest of the dam, or has a minimum impounding capacity of 50 acre-feet or more at the top of the structure.
- See table A1-1 for impoundment facilities with Potential Hazard Classification. Impoundment facilities that do not meet the definition of a “Dam” per KDEP regulations are indicated as “Not Classified”.
 - Structure classifications are established by the KDEP, KRS Chapter 151, and 401 KAR 4:030.
 - 401 KAR 4:030 provide standards regarding impoundment facility structure classification. Division of Water Engineering Memorandum No. 5 (incorporated by reference in 401 KAR 4:030) provides as follows:

“In determining structure classification, a number of factors must be considered. Consideration must be given to the damage that might occur to existing and future developments downstream resulting from a sudden breach of the earth embankment and the structures themselves. The effect of failure on public confidence is an important factor. State and local regulations and the responsibility of the involved public agencies must be recognized. The stability of the spillway materials, the physical characteristics of the site and valley downstream, and the relationship of the site to industrial and residential areas all have a bearing on the amount of potential damage in the event of a failure.”

Division of Water Engineering Memorandum No. 5, page 9.

KDEP regulations provide for the following hazard classifications for impoundments:

“A. Class (A) – Low Hazard

This classification may be applied for structures located such that failure would cause loss of the structure itself but little or no additional damage to other property. Such structures will generally be located in rural or agricultural areas where failure may damage farm buildings other than residences, agricultural lands, or county roads.

B. Class (B) – Moderate Hazard

This classification may be applied for structures located such that failure may cause significant damage to property and project operation, but loss of human life is not envisioned. Such structures will generally be located in predominantly rural agricultural areas where failures may damage isolated homes, main highways or major railroads, or cause interruption of use or service of relatively important public utilities.

C. Class (C) – High Hazard

This classification must be applied for structures located such that failure may cause loss of life, or serious damage to houses, industrial or commercial buildings, important public utilities, main highways or major railroads. This classification must be used if failure would cause probable loss of human life.”

401 KAR 4:030

Impoundment facilities that do not qualify as a dam are not classified by the KDEP, and are indicated in the table A1-1 and throughout this document as “Not Classified”.

- d. Units are regulated by KDEP as described above.
- e. Impoundment facilities that are not defined as a “Dam” per KDEP regulations are listed as “Not Classified” in table A1-1.

KENTUCKY UTILITIES COMPANY / LOUISVILLE GAS and ELECTRIC COMPANY
Response to Request for Information under Section 104(e) of the CERCLA

Table A1-1
Kentucky Utilities Company / Louisville Gas and Electric Company

<u>Power Station</u>	<u>Impoundment Facility Name</u>	<u>KDEP Classification</u>
1 E.W. Brown (KU)	Ash Pond	High Hazard (C)
2 E.W. Brown (KU)	Auxiliary Pond	High Hazard (C)
3 Ghent (KU)	Ash Pond Basin 1	High Hazard (C)
4 Ghent (KU)	Secondary Ash Treatment Basin	Not Classified
5 Ghent (KU)	Ash Pond Basin 2	High Hazard (C)
6 Ghent (KU)	Gypsum Stacking Facility	High Hazard (C)
7 Ghent (KU)	Gypsum Stack Surge/Reclaim Pond	Not Classified
8 Green River (KU)	Main Ash Pond	Low Hazard (A)
9 Green River (KU)	Scrubber Pond	Low Hazard (A)
10 Green River (KU)	Ash Pond Number 2	Not Classified
11 Green River (KU)	Finishing Pond Number 3	Not Classified
12 Green River (KU)	Former Ash Pond (current Coal Run-Off Pond)	Not Classified
13 Pineville (KU)	Ash Pond	Not Classified
14 Tyrone (KU)	Ash Pond	Low Hazard (A)
15 Tyrone (KU)	Finishing Pond	Not Classified
16 Cane Run (LG&E)	Ash Pond	High Hazard (C)
17 Cane Run (LG&E)	Clearwell Pond	Not Classified
18 Cane Run (LG&E)	Dead Storage Pond	Not Classified
19 Cane Run (LG&E)	Emergency Pond	Not Classified
20 Cane Run (LG&E)	Basin Pond	Not Classified
21 Mill Creek (LG&E)	Ash Pond	Moderate Hazard (B)
22 Mill Creek (LG&E)	Emergency Pond	Not Classified
23 Mill Creek (LG&E)	Dead Storage Pond	Not Classified
24 Mill Creek (LG&E)	Clearwell Pond	Not Classified
25 Mill Creek (LG&E)	Construction Run Off Pond	Not Classified
26 Trimble County (LG&E)	Ash Pond	Moderate Hazard (B)

Question No. 2

Q2. What year was each management unit commissioned and expanded?

A2. See table A2-1, below, for commissioned and expansion dates.

	<u>Power Station</u>	<u>Impoundment Facility Name</u>	<u>Year Commissioned</u>
1	E.W. Brown (KU)	Ash Pond	1957, Expanded 1964, 1973, 1990
2	E.W. Brown (KU)	Auxiliary Pond	2008
3	Ghent (KU)	Ash Pond Basin 1	1972, Expanded 1977
4	Ghent (KU)	Secondary Ash Treatment Basin	1972
5	Ghent (KU)	Ash Pond Basin 2	1995, Expanded 2003
6	Ghent (KU)	Gypsum Stacking Facility	1995
7	Ghent (KU)	Gypsum Stack Surge/Reclaim Pond	1995
8	Green River (KU)	Main Ash Pond	1977
9	Green River (KU)	Scrubber Pond	1975
10	Green River (KU)	Ash Pond Number 2	1949
11	Green River (KU)	Finishing Pond Number 3	1949
12	Green River (KU)	Former Ash Pond (current Coal Run-Off Pond)	1949
13	Pineville (KU)	Ash Pond	1977
14	Tyrone (KU)	Ash Pond	1977
15	Tyrone (KU)	Finishing Pond	1977 (Estimated)
16	Cane Run (LG&E)	Ash Pond	1972, Expanded 1977
17	Cane Run (LG&E)	Clearwell Pond	1976, Expanded 1982
18	Cane Run (LG&E)	Dead Storage Pond	1976, Expanded 1982
19	Cane Run (LG&E)	Emergency Pond	1977
20	Cane Run (LG&E)	Basin Pond	1976
21	Mill Creek (LG&E)	Ash Pond	1972, Expanded 1978
22	Mill Creek (LG&E)	Emergency Pond	1981
23	Mill Creek (LG&E)	Dead Storage Pond	1978
24	Mill Creek (LG&E)	Clearwell Pond	1978
25	Mill Creek (LG&E)	Construction Run Off Pond	1978
26	Trimble County (LG&E)	Ash Pond	1990

Question No. 3

- Q3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other," please specify the other types of materials that are temporarily or permanently contained in the unit(s).
- A3. See table A3-1, below, for a listing of the materials temporarily or permanently contained in each impoundment facility.

(This space intentionally blank)

Table A3-1
Kentucky Utilities Company / Louisville Gas and Electric Company

<u>Power Station</u>	<u>Impoundment Facility Name</u>	<u>Materials Contained</u>
1 E.W. Brown (KU)	Ash Pond	Bottom Ash, Fly Ash, Boiler Slag, Other (Coal Fines, Process Water Drainage, Pyrites)
2 E.W. Brown (KU)	Auxiliary Pond	Bottom Ash, Fly Ash, Boiler Slag, Other (Coal Fines, Process Water Drainage, Pyrites)
3 Ghent (KU)	Ash Pond Basin 1	Bottom Ash, Fly Ash, Boiler Slag, Other (Coal Fines, Process Water Drainage, Pyrites, Treated Sanitary Wastewater)
4 Ghent (KU)	Secondary Ash Treatment Basin	Bottom Ash, Fly Ash
5 Ghent (KU)	Ash Pond Basin 2	Bottom Ash, Fly Ash, Boiler Slag, Other (Pyrites)
6 Ghent (KU)	Gypsum Stacking Facility	Flue Gas Emission Controls Residual
7 Ghent (KU)	Gypsum Stack Surge/Reclaim Pond	Flue Gas Emission Controls Residual
8 Green River (KU)	Main Ash Pond	Bottom Ash, Fly Ash, Boiler Slag, Other (Coal Fines, Pyrites)
9 Green River (KU)	Scrubber Pond	Flue Gas Emission Controls Residual
10 Green River (KU)	Ash Pond Number 2	Bottom Ash, Fly Ash, Boiler Slag, Other (Coal Fines)
11 Green River (KU)	Finishing Pond Number 3	Bottom Ash, Fly Ash
12 Green River (KU)	Former Ash Pond (current Coal Run-Off Pond)	Bottom Ash, Fly Ash, Boiler Slag, Other (Coal Fines, Process Water Drainage, Pyrites, Treated Sanitary Wastewater)
13 Pineville (KU)	Ash Pond	Bottom Ash, Fly Ash, Boiler Slag, Other (Coal Fines, Process Water Drainage, Pyrites)
14 Tyrone (KU)	Ash Pond	Bottom Ash, Fly Ash, Boiler Slag, Other (Coal Fines, Process Water Drainage, Pyrites, Treated Sanitary Wastewater)
15 Tyrone (KU)	Finishing Pond	Bottom Ash, Fly Ash
16 Cane Run (LG&E)	Ash Pond	Bottom Ash, Fly Ash, Boiler Slag, Other (Coal Fines, Process Water Drainage, Pyrites, Treated Sanitary Wastewater)
17 Cane Run (LG&E)	Clearwell Pond	Flue Gas Emission Controls Residual
18 Cane Run (LG&E)	Dead Storage Pond	Flue Gas Emission Controls Residual
19 Cane Run (LG&E)	Emergency Pond	Flue Gas Emission Controls Residual, Other (Process Water Drainage)
20 Cane Run (LG&E)	Basin Pond	Flue Gas Emission Controls Residual, Other (Process Water Drainage)
21 Mill Creek (LG&E)	Ash Pond	Bottom Ash, Fly Ash, Boiler Slag, Flue Gas Emission Controls Residual, Other (Coal Fines, Process Water Drainage, Pyrites)
22 Mill Creek (LG&E)	Emergency Pond	Flue Gas Emission Controls Residual
23 Mill Creek (LG&E)	Dead Storage Pond	Flue Gas Emission Controls Residual
24 Mill Creek (LG&E)	Clearwell Pond	Flue Gas Emission Controls Residual
25 Mill Creek (LG&E)	Construction Run Off Pond	Flue Gas Emission Controls Residual
26 Trimble County (LG&E)	Ash Pond	Bottom Ash, Fly Ash, Boiler Slag, Flue Gas Emission Controls Residual, Other (Coal Fines, Process Water Drainage, Pyrites, Treated Sanitary Wastewater)

Question No. 4

- Q4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?
- A4. Table A4-1, below, summarizes Professional Engineers' design and construction monitoring for associated impoundment facilities.

All of the company's management units are under the supervision of Professional Engineers employed by the company who are responsible for inspection and monitoring of those facilities.

In addition, KDEP employs Professional Engineers who are responsible for inspection and monitoring classified impoundment facilities as shown in table A1-1.

(This space intentionally blank)

KENTUCKY UTILITIES COMPANY / LOUISVILLE GAS and ELECTRIC COMPANY
Response to Request for Information under Section 104(e) of the CERCLA

Table A4-1

Kentucky Utilities Company / Louisville Gas and Electric Company

	<u>Power Station</u>	<u>Impoundment Facility Name</u>	<u>Designed by Professional Engineer</u>	<u>Construction Supervised by Professional Engineer</u>
1	E.W. Brown (KU)	Ash Pond	1973, 1990-Yes	1990-Yes
2	E.W. Brown (KU)	Auxiliary Pond	Yes	Yes
3	Ghent (KU)	Ash Pond Basin 1	Yes	Undetermined*
4	Ghent (KU)	Secondary Ash Treatment Basin	Yes	Undetermined*
5	Ghent (KU)	Ash Pond Basin 2	Yes	Yes
6	Ghent (KU)	Gypsum Stacking Facility	Yes	Yes
7	Ghent (KU)	Gypsum Stack Surge/Reclaim Pond	Yes	Yes
8	Green River (KU)	Main Ash Pond	Yes	Undetermined*
9	Green River (KU)	Scrubber Pond	Undetermined*	Undetermined*
10	Green River (KU)	Ash Pond Number 2	Undetermined*	Undetermined*
11	Green River (KU)	Finishing Pond Number 3	Undetermined*	Undetermined*
12	Green River (KU)	Former Ash Pond (current Coal Run-Off Pond)	Undetermined*	Undetermined*
13	Pineville (KU)	Ash Pond	Undetermined*	Undetermined*
14	Tyrone (KU)	Ash Pond	Yes	Undetermined*
15	Tyrone (KU)	Finishing Pond	Undetermined*	Undetermined*
16	Cane Run (LG&E)	Ash Pond	Undetermined*	Undetermined*
17	Cane Run (LG&E)	Clearwell Pond	Undetermined*	Undetermined*
18	Cane Run (LG&E)	Dead Storage Pond	Undetermined*	Undetermined*
19	Cane Run (LG&E)	Emergency Pond	Undetermined*	Undetermined*
20	Cane Run (LG&E)	Basin Pond	Undetermined*	Undetermined*
21	Mill Creek (LG&E)	Ash Pond	Undetermined*	Undetermined*
22	Mill Creek (LG&E)	Emergency Pond	Undetermined*	Undetermined*
23	Mill Creek (LG&E)	Dead Storage Pond	Undetermined*	Undetermined*
24	Mill Creek (LG&E)	Clearwell Pond	Undetermined*	Undetermined*
25	Mill Creek (LG&E)	Construction Run Off Pond	Undetermined*	Undetermined*
26	Trimble County (LG&E)	Ash Pond	Yes	Yes

* With respect to facilities identified as "undetermined," we are unable to determine the exact level of involvement by Professional Engineers based on our review of documents to date. We will continue to search for and review additional documents and will supplement this response to the extent that additional information is identified which allows us to make a more complete response.

Question No. 5

- Q5. **a.** When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)?
- b.** Briefly describe the credentials of those conducting the structural integrity assessments/evaluations.
- c.** Identify actions taken or planned by facility personnel as a result of these assessments or evaluations.
- d.** If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors.
- e.** If the company plans an assessment or evaluation in the future, when is it expected to occur?

- A5. **a.** Visual site assessments for six (6) impoundment facilities classified as “High (C)” and two (2) classified as “Moderate (B)” were performed in a three (3) day time period from January 19 - 21, 2009.

Visual site assessments for the three (3) impoundment facilities classified as “Low (A)” were performed on February 9 & 10, 2009.

Visual site assessments for the fourteen (14) remaining impoundment facilities shown in table A1-1 not classified by the KDEP were completed by March 21, 2009.

See table A5-1, next page, for a summary of visual site assessment dates.

(This space intentionally blank)

Table A5-1				
Kentucky Utilities Company / Louisville Gas and Electric Company				
	<u>Power Station</u>	<u>Impoundment Facility Name</u>	<u>Most Recent Visual Assessment</u>	<u>Maintenance Action Items Table</u>
1	E.W. Brown (KU)	Ash Pond	Jan 19, 2009	A5-3
2	E.W. Brown (KU)	Auxiliary Pond	Jan 19, 2009	A5-3
3	Ghent (KU)	Ash Pond Basin 1	Jan 20, 2009	A5-4
4	Ghent (KU)	Secondary Ash Treatment Basin	Mar 19, 2009	A5-4
5	Ghent (KU)	Ash Pond Basin 2	Jan 21, 2009	A5-4
6	Ghent (KU)	Gypsum Stacking Facility	Jan 20, 2009	A5-4
7	Ghent (KU)	Gypsum Stack Surge/Reclaim Pond	Mar 19, 2009	A5-4
8	Green River (KU)	Main Ash Pond	Feb 10, 2009	A5-5
9	Green River (KU)	Scrubber Pond	Feb 10, 2009	A5-5
10	Green River (KU)	Ash Pond Number 2	Jan 13, 2009	A5-5
11	Green River (KU)	Finishing Pond Number 3	Jan 13, 2009	A5-5
12	Green River (KU)	Former Ash Pond (current Coal Run-Off Pond)	Jan 13, 2009	A5-5
13	Pineville (KU)	Ash Pond	Jan 14, 2009	A5-6
14	Tyrone (KU)	Ash Pond	Feb 9, 2009	A5-7
15	Tyrone (KU)	Finishing Pond	Feb 9, 2009	A5-7
16	Cane Run (LG&E)	Ash Pond	Jan 19, 2009	A5-8
17	Cane Run (LG&E)	Clearwell Pond	Mar 17, 2009	A5-8
18	Cane Run (LG&E)	Dead Storage Pond	Mar 17, 2009	A5-8
19	Cane Run (LG&E)	EmergencyPond	Mar 17, 2009	A5-8
20	Cane Run (LG&E)	Basin Pond	Mar 17, 2009	A5-8
21	Mill Creek (LG&E)	Ash Pond	Jan 19, 2009	A5-9
22	Mill Creek (LG&E)	Emergency Pond	Mar 17, 2009	A5-9
23	Mill Creek (LG&E)	Dead Storage Pond	Mar 17, 2009	A5-9
24	Mill Creek (LG&E)	Clearwell Pond	Mar 17, 2009	A5-9
25	Mill Creek (LG&E)	Construction Run Off Pond	Mar 17, 2009	A5-9
26	Trimble County (LG&E)	Ash Pond	Jan 20, 2009	A5-10

- b. The companies retained a professional geotechnical engineering services firm, ATC Associates, with extensive experience in the dam safety area to conduct visual inspections for impoundment facilities classified by KDEP as “High (C)”, “Moderate (B)” and “Low (A)”. Assessment activities included record review, measurement of impoundment facility features, facility operator interviews, and field observations. Assessments were conducted by recognized dam safety experts in accordance with

KDEP's "Guidelines for Maintenance and Inspection of Dams in Kentucky", as published in July 1985 and accepted methods for inspecting dams. Geotechnical service firm Professional Engineers were accompanied on site by company Professional Engineers responsible for the safety of company impoundment facilities.

Company employees conducted visual assessments directed by Professional Engineers responsible for the safety of impoundment facilities shown in table A1-1. The companies' plan to arrange for a professional geotechnical engineering firm to conduct visual site assessments by April 30, 2009, for impoundment facilities listed as "Not Classified" as shown in table A1-1 the KDEP.

- c. Visual assessments confirmed that no recognizable safety deficiencies exist at company impoundment facilities. No immediate safety remedial actions were recommended. Assessments identified action items relating to routine maintenance for each impoundment facility. Tables A5-2 thru A5-10 identify the action items planned by the company (see documents included as Enclosure A). Action items that have been completed are indicated by a date in the "cleared" column. Cleared action items are current as of March 24, 2009. Items prioritized as follows:

High: Recommend that action item be addressed as soon as possible.

Moderate: Recommend that action item be addressed as soon as feasible – preferably before the next state inspection.

Normal: Recommend that action item be addressed as part of the ongoing maintenance of the structure.

- d. Action items have been or will be performed by qualified company personnel or contractors under the direction and oversight of company Professional Engineers responsible for dam safety.
- e. A planned assessment by a geotechnical engineering firm of the companies KDEP classified impoundment facilities in table A1-1 is expected by September 30, 2009.

Question No. 6

- Q6. a. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)?
- b. If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur?
- c. Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation.
- d. Please provide a copy of the most recent official inspection report or evaluation.
- A6. KRS 151.293, Section 6, authorizes the KDEP to inspect existing impoundment facilities that are classified as Dams. In determining the frequency of inspection of a particular dam, the agency takes into consideration the size and type, topography, geology, soil condition, hydrology, climate, use of the reservoir, the lands lying in the floodplain downstream and the hazard classification of the dam. High and Moderate-hazard dams are inspected every two years. Low-hazard dams are inspected every five years. If the

structure meets all the necessary requirements as outlined in Engineering Memorandum No. 5, a Certificate of Inspection is issued to the owner.

- a/b/c.** See table A6-1, next page, for a summary of last KDEP inspection dates and next expected inspection.

In addition, in March of 2009, the U.S. Army Corps of Engineers (USACE) and the Louisville and Jefferson County Metropolitan Sewer District (MSD) inspected a portion of the Mill Creek ash pond facility. The inspection was limited only to portions of the ash pond embankment that are part of the local flood protection levee.

The company is not aware of any other inspections by the USACE or any inspection by other Federal or State regulatory agencies for impoundment facilities listed in table A1-1.

- d.** Ten of eleven KDEP-classified impoundment facilities have KDEP Certificates of Inspection. The remaining classified impoundment facility, the E.W. Brown auxiliary pond, was granted an approval to impound by KDEP following a review of the as built plans and on-site inspection on June 20, 2008. The E.W. Brown auxiliary pond is expected to be inspected by KDEP in 2010. Copies of the most recent KDEP Certificates of Inspection for Dam and Appurtenant Works are enclosed as Exhibits A6-1 thru A6-11. Note that Certificates of Inspection for the classified impoundment facilities at Ghent Station are reflective of the previous inspection because the KDEP inspected these facilities on March 12, 2009, and the company has not yet received inspection certificates from KDEP.

(This space intentionally blank)

KENTUCKY UTILITIES COMPANY / LOUISVILLE GAS and ELECTRIC COMPANY
Response to Request for Information under Section 104(e) of the CERCLA

<p align="center">Table A6-1 Kentucky Utilities Company / Louisville Gas and Electric Company</p>				
<u>Power Station</u>	<u>Impoundment Facility Name</u>	<u>Most Recent KDEP Inspection</u>	<u>Next Expected KDEP Inspection</u>	<u>Copy of Most Recent KDEP Certificate of Inspection</u>
1 E.W. Brown (KU)	Ash Pond	July 30, 2008	2010	Exhibit A6-1
2 E.W. Brown (KU)	Auxiliary Pond	June 20, 2008	2010	Exhibit A6-2
3 Ghent (KU)	Ash Pond Basin 1	Mar 12, 2009	2011	Exhibit A6-3
4 Ghent (KU)	Secondary Ash Treatment Basin	Not Classified	Not Classified	Not Classified
5 Ghent (KU)	Ash Pond Basin 2	Mar 12, 2009	2011	Exhibit A6-4
6 Ghent (KU)	Gypsum Stacking Facility	Mar 12, 2009	2011	Exhibit A6-5
7 Ghent (KU)	Gypsum Stack Surge/Reclaim Pond	Not Classified	Not Classified	Not Classified
8 Green River (KU)	Main Ash Pond	Nov 15, 2004	2009	Exhibit A6-6
9 Green River (KU)	Scrubber Pond	Nov 15, 2004	2009	Exhibit A6-7
10 Green River (KU)	Ash Pond Number 2	Not Classified	Not Classified	Not Classified
11 Green River (KU)	Finishing Pond Number 3	Not Classified	Not Classified	Not Classified
12 Green River (KU)	Former Ash Pond (current Coal Run-Off Pond)	Not Classified	Not Classified	Not Classified
13 Pineville (KU)	Ash Pond	Not Classified	Not Classified	Not Classified
14 Tyrone (KU)	Ash Pond	Jun 9, 2005	2010	Exhibit A6-8
15 Tyrone (KU)	Finishing Pond	Jun 9, 2005	2010	Exhibit A6-8
16 Cane Run (LG&E)	Ash Pond	Oct 16, 2008	2010	Exhibit A6-9
17 Cane Run (LG&E)	Clearwell Pond	Not Classified	Not Classified	Not Classified
18 Cane Run (LG&E)	Dead Storage Pond	Not Classified	Not Classified	Not Classified
19 Cane Run (LG&E)	Emergency Pond	Not Classified	Not Classified	Not Classified
20 Cane Run (LG&E)	Basin Pond	Not Classified	Not Classified	Not Classified
21 Mill Creek (LG&E)	Ash Pond	Oct 16, 2008	2010	Exhibit A6-10
22 Mill Creek (LG&E)	Emergency Pond	Not Classified	Not Classified	Not Classified
23 Mill Creek (LG&E)	Dead Storage Pond	Not Classified	Not Classified	Not Classified
24 Mill Creek (LG&E)	Clearwell Pond	Not Classified	Not Classified	Not Classified
25 Mill Creek (LG&E)	Construction Run Off Pond	Not Classified	Not Classified	Not Classified
26 Trimble County (LG&E)	Ash Pond	Sept 7, 2005	2009	Exhibit A6-11

Question No. 7

- Q7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.
- A7. While KDEP inspections have indentified routine maintenance issues, no safety issue(s) have been identified by KDEP within the past year. See table A6-1 for a summary of most recent KDEP inspections.

In August of 2008, the USACE, and MSD inspected a portion of the Mill Creek ash pond embankment that is part of local flood protection levee. The agencies requested action to address an ash pond rim ditch constructed in the area of the flood protection levee. In response to the request, the company retained a professional geotechnical engineering firm to survey and evaluate the embankment area. The survey and evaluation confirmed the absence of any significant disturbance of the flood protection levee as a result of ash pond operations or other condition threatening its structural integrity. However, the company committed to fill in the existing rim ditch and relocate a new rim ditch away from the immediate vicinity of the flood protection levee. Relocation of the rim ditch was completed in 2009. The company also completed other maintenance such as removal of a tree from the embankment. Other action items in progress include filling the abandoned rim ditch, cross section surveys, re-vegetation of slopes, and installation of easement markers (see enclosure C). The agencies have not identified any other conditions that pose a potential risk to the integrity of the flood protection levee.

The company is not aware of any other Federal Agency safety evaluations or inspections of impoundment facilities listed in table A1-1.

Question No. 8

- Q8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s)? Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.
- A8. Reference table A8-1.

(This space intentionally blank)

KENTUCKY UTILITIES COMPANY / LOUISVILLE GAS and ELECTRIC COMPANY
Response to Request for Information under Section 104(e) of the CERCLA

Table A8-1 Kentucky Utilities Company / Louisville Gas and Electric Company					
<u>Power Station</u>	<u>Impoundment Facility Name</u>	<u>Surface Area (Acres)</u>	<u>Estimated Total Storage Capacity (Cubic Yards x 1000)</u>	<u>Estimated Volume of Material Stored as of (Date) (Cubic Yards x 1000)</u>	<u>Height (feet)</u>
1 E.W. Brown (KU)	Ash Pond	126	Undetermined*	Undetermined*	126
2 E.W. Brown (KU)	Auxiliary Pond	35	830	75 (Jan 2009)	75
3 Ghent (KU)	Ash Pond Basin 1	120	7000	7000 (Jan 2009)	52
4 Ghent (KU)	Secondary Ash Treatment Basin	4	Note 3	Note 3	0
5 Ghent (KU)	Ash Pond Basin 2	146	11600	7500	227
6 Ghent (KU)	Gypsum Stacking Facility	46	4450	950	25-See note 2
7 Ghent (KU)	Gypsum Stack Surge/Reclaim Pond	7.5	Note 3	Note 3	0
8 Green River (KU)	Main Ash Pond	37	1250	1100 (Jan 2009)	54
9 Green River (KU)	Scrubber Pond	12	242	Undetermined*	20
10 Green River (KU)	Ash Pond Number 2	23	Undetermined*	Undetermined*	See note 1
11 Green River (KU)	Finishing Pond Number 3	2.5	Undetermined*	Undetermined*	See note 1
12 Green River (KU)	Former Ash Pond (current Coal Run-Off Pond)	6	Undetermined*	Undetermined*	See note 1
13 Pineville (KU)	Ash Pond	7	Undetermined*	Undetermined*	17
14 Tyrone (KU)	Ash Pond	13	Undetermined*	Undetermined*	16
15 Tyrone (KU)	Finishing Pond	0.5	Undetermined*	Undetermined*	See note 1
16 Cane Run (LG&E)	Ash Pond	40	1400	1325 (Jan 2009)	12
17 Cane Run (LG&E)	Clearwell Pond	0.5	Undetermined*	Undetermined*	10
18 Cane Run (LG&E)	Dead Storage Pond	3.5	Undetermined*	Undetermined*	10
19 Cane Run (LG&E)	Emergency Pond	1.5	Undetermined*	Undetermined*	12
20 Cane Run (LG&E)	Basin Pond	1.5	Undetermined*	Undetermined*	10
21 Mill Creek (LG&E)	Ash Pond	43	Undetermined*	Undetermined*	77
22 Mill Creek (LG&E)	Emergency Pond	0.5	Note 3	Note 3	0
23 Mill Creek (LG&E)	Dead Storage Pond	2	Note 3	Note 3	0
24 Mill Creek (LG&E)	Clearwell Pond	2	Note 3	Note 3	0
25 Mill Creek (LG&E)	Construction Run Off Pond	2.5	Note 3	Note 3	0
26 Trimble County (LG&E)	Ash Pond	82	7810	5200 (Feb 2009)	40

Note 1: The company plans to determine the height of these facilities by April 15, 2009

Note 2: Height value based on current condition, final design height is 130 ft.

Note 3: These facilities have no embankments and are used as finishing ponds, therefore no stored material exists above the ground level.

* With respect to facilities identified as "undetermined," we are unable to determine the values based on our review of documents to date. We will continue to search for and review additional documents and will supplement this response to the extent that additional information is identified which allows us to make a more complete response.

Question No. 9

- Q9. Please provide a brief history of known spills or un-permitted releases from the unit within the last ten years, whether or not these were reported to State or Federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).
- A9. A review of relevant documents indicates that there has not been a spill from any of the impoundment facilities shown in table A1-1 within the last 10 years.

Question No. 10

- Q10. Please identify all current legal owner(s) and operator(s) at the facility.
- A10. Table A10-1 summarizes the company impoundment facility legal owner(s) and operator(s).

(This space intentionally blank)

KENTUCKY UTILITIES COMPANY / LOUISVILLE GAS and ELECTRIC COMPANY
Response to Request for Information under Section 104(e) of the CERCLA

Table A10-1
Kentucky Utilities Company / Louisville Gas and Electric Company

<u>Power Station</u>	<u>Impoundment Facility Name</u>	<u>Current Legal Owner</u>	<u>Current Facility Operator</u>
1 E.W. Brown (KU)	Ash Pond	Kentucky Utilities Co.	Kentucky Utilities Co.
2 E.W. Brown (KU)	Auxiliary Pond	Kentucky Utilities Co.	Kentucky Utilities Co.
3 Ghent (KU)	Ash Pond Basin 1	Kentucky Utilities Co.	Kentucky Utilities Co.
4 Ghent (KU)	Secondary Ash Treatment Basin	Kentucky Utilities Co.	Kentucky Utilities Co.
5 Ghent (KU)	Ash Pond Basin 2	Kentucky Utilities Co.	Kentucky Utilities Co.
6 Ghent (KU)	Gypsum Stacking Facility	Kentucky Utilities Co.	Kentucky Utilities Co.
7 Ghent (KU)	Gypsum Stack Surge/Reclaim Pond	Kentucky Utilities Co.	Kentucky Utilities Co.
8 Green River (KU)	Main Ash Pond	Kentucky Utilities Co.	Kentucky Utilities Co.
9 Green River (KU)	Scrubber Pond	Kentucky Utilities Co.	Kentucky Utilities Co.
10 Green River (KU)	Ash Pond Number 2	Kentucky Utilities Co.	Kentucky Utilities Co.
11 Green River (KU)	Finishing Pond Number 3	Kentucky Utilities Co.	Kentucky Utilities Co.
12 Green River (KU)	Former Ash Pond (current Coal Run-Off Pond)	Kentucky Utilities Co.	Kentucky Utilities Co.
13 Pineville (KU)	Ash Pond	Kentucky Utilities Co.	Kentucky Utilities Co.
14 Tyrone (KU)	Ash Pond	Kentucky Utilities Co.	Kentucky Utilities Co.
15 Tyrone (KU)	Finishing Pond	Kentucky Utilities Co.	Kentucky Utilities Co.
16 Cane Run (LG&E)	Ash Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
17 Cane Run (LG&E)	Clearwell Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
18 Cane Run (LG&E)	Dead Storage Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
19 Cane Run (LG&E)	Emergency Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
20 Cane Run (LG&E)	Basin Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
21 Mill Creek (LG&E)	Ash Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
22 Mill Creek (LG&E)	Emergency Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
23 Mill Creek (LG&E)	Dead Storage Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
24 Mill Creek (LG&E)	Clearwell Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
25 Mill Creek (LG&E)	Construction Run Off Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.
26 Trimble County (LG&E)	Ash Pond	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.