


US EPA ARCHIVE DOCUMENT



PowerSouth®
ENERGY COOPERATIVE

A Touchstone Energy® Cooperative 

Damon Morgan

VICE PRESIDENT, POWER SUPPLY DIVISION

March 26, 2009

Mr. Richard Kinch
U.S. Environmental Protection Agency (5306P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Request for Information Under Section 104(e) of the Comprehensive
Environmental Response, Compensation and Liability Act 42 U.S.C. 9604 (e)

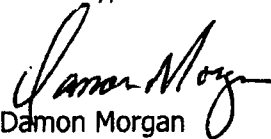
Dear Mr. Kinch:

This letter and attachment are in response to a letter and request for information from EPA Acting Assistant Administrator, Barry N. Breen, dated March 9, 2009, and received by PowerSouth Energy Cooperative (formerly known as Alabama Electric Cooperative, Inc.) on March 13, 2009, regarding PowerSouth's Charles R. Lowman Power Plant ("Lowman Plant").

The Lowman Plant is the only facility controlled by PowerSouth which has surface impoundments or similar diked or bermed management units(s) or management units designated as landfills which receive liquid-borne material from a surface impoundment used for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals.

PowerSouth has another facility, the McWilliams Plant in Gantt, AL, which was converted from a coal-fired plant to a gas-fired combined-cycle plant circa 1995. When the McWilliams Plant was fired with coal, the facility used an ash pond. However, when the McWilliams Plant was repowered, most of the ash was removed and the pond was converted to a Process Pond to receive wastewater from the gas-fired McWilliams Plant. No data on the McWilliams Process Pond is included in the attachment to this letter since the pond no longer receives residuals or by-products from the combustion of coal.

Sincerely,



Damon Morgan
Vice President
Power Supply

DM/mn

Enclosure

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1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less than Low Hazard Potential, 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 units. If the unit(s) does not have a rating, please note that fact.

Response:

- *Unit 1 Ash Pond: No rating has been assigned.*
- *Units 2 & 3 Ash Pond: No rating has been assigned.*
- *Flue Gas Desulfurization ("FGD") Pond: No rating has been assigned.*

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

Response:

- *Unit 1 Ash Pond: 1969. The height of the Unit 1 Ash Pond was increased by 4.3 ft in 1998.*
- *Units 2 & 3 Ash Pond: 1979.*
- *FGD Pond: 1979.*

3. 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).

Response:

- *Unit 1 Ash Pond: (1) bottom ash; (2) fly ash; and (3) boiler slag.*
- *Units 2 & 3 Ash Pond: (1) bottom ash; (2) fly ash and (3) boiler slag.*
- *FGD Pond: flue gas desulfurization residuals.*

4. Was the management unit(s) designed by Professional Engineer? Is or was the construction of the 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?

Response:

- *Designed by Professional Engineer?*
 - *Unit 1 Ash Pond: Yes. Unit 1 Expansion: No*
 - *Unit 2 & 3 Ash Pond: Yes.*
 - *FGD Pond: Yes.*
- *Constructed under the supervision of a Professional Engineer?*
 - *Unit 1 Ash Pond: Yes. Unit 1 Expansion: No.*
 - *Unit 2 & 3 Ash Pond: Yes.*
 - *FGD Pond: Yes.*

- *Inspection/safety monitoring under the supervision of a Professional Engineer?*
 - *Unit 1 Ash Pond: No.*
 - *Unit 2 & 3 Ash Pond: No.*
 - *FGD Pond: No.*

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

Response:

- *Last company assessment or evaluation:*
 - *Unit 1 Ash Pond: The dike is stable and well vegetated. Grass is maintained by plant personnel, but no formal safety evaluations have been conducted.*
 - *Units 2 & 3: The dike is stable and well vegetated. Grass is maintained by plant personnel, but no formal safety evaluations have been conducted.*
 - *FGD Pond: The dike is stable and well vegetated. Grass is maintained by plant personnel, but no formal safety evaluations have been conducted.*
- *No corrective actions have been taken or are planned.*
- *A "Phase I" evaluation by a third party civil engineering firm is underway and should be completed in April 2009.*

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

Response:

- *No inspections or evaluations have been completed by State or Federal regulatory officials.*
- *PowerSouth has not been informed of any planned inspections or evaluations.*

7. 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.

Response:

- *Not applicable.*

8. What is the surface area (acres) and total storage capacity of each of the management unit(s)? What is the volume of material currently stored in each of the management unit(s)? Please provide the date that the volume measurement(s) were taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

Response:

- *Acreage and Capacity*
 - *Unit 1 Ash Pond: 16.5 acres, 330 acre-feet.*
 - *Unit 2 & 3 Ash Pond: 29 acres, 629 acre-feet.*
 - *FGD Pond: 35 acres, 760 acre-feet.*
- *Visual Storage Estimates as of 03/13/2009:*
 - *Unit 1 Ash Pond: 30% full, or about 110 acre-feet.*
 - *Unit 2 & 3 Ash Pond: 50% full, or about 320 acre-feet.*
 - *FGD Pond: 70% full, or about 530 acre-feet.*
- *Maximum Height:*
 - *Unit 1 Ash Pond: 14.3 ft.*
 - *Unit 2 & 3 Ash Pond: 11.5 ft*
 - *FGD Pond: 11.5 ft.*

9. Please provide a brief history of known spills or unpermitted 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).

Response:

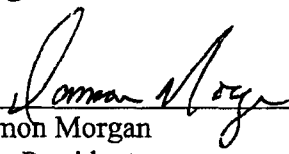
- *None.*

10. Please identify all current legal owner(s) and operator(s) of the facility.

Response:

- *PowerSouth Energy Cooperative (formerly known as Alabama Electric Cooperative, Inc.) is the legal owner and operator of the management units.*

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.



Damon Morgan
Vice President
Power Supply