

US EPA ARCHIVE DOCUMENT



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Western Kentucky Energy
145 N. Main Street
P.O. Box 1518
Henderson, KY 42419-1518
270-844-6031
270-844-6023 FAX

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

Dear Mr. Kinch:

Western Kentucky Energy (WKE) is responding to your letter dated March 9, 2009 requesting information on coal ash impoundments. In direct response to your statement to maintain continued diligence on disposal units, WKE agrees with this and has always maintained the operation of our ash ponds so as to minimize the risk of failure of these units.

In response to the seven questions contain in your letter, WKE has the following information on Reid/Green/HMP&L Station II plant site:

Reid/HMP&L Station II ash pond:

1. Hazard Class: Moderate as determined by the State of Kentucky, Dam No. 0855
2. Drawings for the ash pond are dated October 8, 1971
3. Originally fly ash and bottom ash were stored in the pond. The fly ash was redirected to an on-site flue gas emission landfill in 1980. Now only bottom ash is stored in the pond.
4. The pond was designed by H.J. Hanna PE # 5980 Burns and McDonnell Engineering Co. The pond was constructed during the construction of the HMP&L Station II. The State of Kentucky inspections are generally, conducted by professional engineers. In the future the dam will be inspected by a third party engineering firm once a year in addition to the inspections performed by plant personnel.
5. Prior to the Kingston failure, WKE utilized an informal random inspection of the dam in addition to the inspections performed by the State of Kentucky. WKE has employed Associated Engineers to inspect the dam and to provide specialized training to plant personnel to inspect the dam between inspections by third party engineers. The inspection and training are expected to be completed by April 10, 2009.
6. The State of Kentucky inspected the dam in 2008.
7. The inspections have not identified any safety issues. The only issues that have been identified are wave erosion and cattail growth. In all cases the corrective actions were to cut the cattails and selective placement of riprap rock to stop wave erosion and the plant has completed those repairs.

Dam Height: 39 feet

Green Station Ash Pond:

1. Hazard Class: Low as determined by the State of Kentucky, Dam No. 0980
2. Drawings for the ash pond are dated August 8, 1978
3. (2) Bottom Ash
4. The ash pond was designed by Burns and Roe Inc. The pond was constructed during the construction of the generation unit. The State of Kentucky inspectors are generally, conducted by professional engineers. In the future the dam will be inspected by a third party engineering firm once a year in addition to the inspections performed by plant personnel.
5. Prior to the Kingston failure, WKE utilized an informal random inspection of the dam in addition to the inspections performed by the State of Kentucky. WKE has employed Associated Engineers to inspect

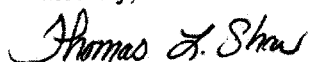
the dam and to provide specialized training to plant personnel to inspect the dam between inspections by third party engineers. The inspection and training are expected to be completed by April 10, 2009.

6. The State of Kentucky inspected the dam in 2008.
7. The inspection has not been released by the State for 2008. In previous years the corrective action noted were repairs to wave erosion and the plant has completed those repairs.

Dam Height: 21 feet.

If you have any additional questions or need additional information please contact me at tom.shaw@eon-us.com or by phone at 270-844-6031.

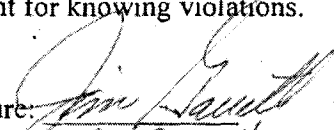
Sincerely,



Thomas L. Shaw

Manager Environmental and Technical Services

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.

Signature: 
Name: Jim GARRETT
Title: General Mgt. - Sebree Station

This request has been reviewed and approved by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C., 3501-3520.

Please send your reply to:

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

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

Mr. Richard Kinch
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Dr.
5th Floor; N-5783
Arlington, VA 22202 2733

EPA expects the owners and operators of these units to exercise the utmost care and diligence in examining whether there are any potential concerns at the units and to take appropriate actions to address them. We ask that this effort be a priority at the highest levels of your organization to ensure the protection of public health, safety, and the environment.