

US EPA ARCHIVE DOCUMENT



May 14, 2009

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

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

Dear Mr. Kinch:

Western Kentucky Energy (WKE) is responding to your letter received May 1, 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 ten questions contain in your letter, WKE has the following information on Coleman Station site:

Active Recirculation Ash Pond:

1. Hazard Class: Moderate as determined by the State of Kentucky, Dam No. 0842
2. Drawings for the ash pond are dated May 31, 1979
3. Fly ash and bottom ash are stored in the pond.
4. The pond was designed by William Rusert P.E. Burns and Roe Engineers and Constructors, INC. The pond was constructed under the direction of Burns and Roe; however I do not have specific information on the engineer on-site during the construction. The dam was inspected by Associated Engineers on March 24, 2009. and a report was issued by David Lamb P.E. Plant employees provide a monthly inspection in addition to the quarterly inspection.
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 on a quarterly basis. The last formal inspection was conducted on March 24, 2009 by Matthew Lile a certified Mine Safety and Health Administration impoundment inspector and David Lamb P.E. owner of Associated Engineers. The report identified several non critical issues such as removal of brush on the outside of the dam and tire ruts on top of the dam. My self along with plant personnel met in early April to review the action item lists, assign tasks and completion dates. Western Kentucky Energy has contracted with Associated Engineers to complete a quarterly inspection of the dike in addition to a monthly inspection by plant employees.
6. Attachment 1 contains the report.
7. There are no safety issues.
8. The surface area of the ash pond is approximately 23 acres. The design ash volume of this pond is 51,400,000 cubic feet. The volume of the material stored in the pond as of November 20, 2007 was 45,425,380 cubic feet. 5,400,000 cubic feet of ash is removed each year from the pond.
Dam Height: 30 feet based upon cross section of dam on design drawing.
9. No releases or spills
10. Big Rivers Electric Corp 201 Third Street Henderson Kentucky 42420 (owner)
Western Kentucky Energy Corp 145 N Main Street Henderson Kentucky 42420 (operator)

South Ash Pond:

1. Hazard Class: Less than low. Not of sufficient height or volume to be included in the State of Kentucky inspection list.
2. Drawings for the ash pond are dated February 12, 1971
3. Fly ash and bottom ash
4. The ash pond was designed by Parsons-Jurden Corp and stamped by Edwin Radin P.E. 6643. Due to the age of the pond Western Kentucky Energy is not able to verify the existence of a professional engineer on site during the construction. The drawings do indicate the drawings are as built. The dam was inspected by Associated Engineers on March 24, 2009 and a report were issued by David Lamb P.E. Plant employees provide a monthly inspection in addition to the quarterly inspection.
5. Prior to the Kingston failure, WKE utilized an informal random inspection of the dam. 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 last formal inspection was conducted on March 24, 2009 by Matthew Lile Civil Designer/Quality Assurance Manager and by David Lamb P.E.
6. The dam is not inspected by the State of Kentucky.
7. There are no safety issues.
8. The pond has a surface area based upon drawings of 19.5 acres. The pond is not currently in use and the amount of water in the pond is limited. The storage volume has not been determined at this time. The maximum height of the dam based upon drawings is 15 feet.
9. No releases or spills
10. Big Rivers Electric Corp 201 Third Street Henderson Kentucky 42420 (owner)
Western Kentucky Energy Corp 145 N Main Street Henderson

New Ash Pond:

1. Hazard Class: Low as determined by the State of Kentucky.
2. Construction began in 2007 and terminated in late 2008.
3. Fly ash, bottom ash and gypsum.
4. The pond was designed by Associated Engineers David Lamb P.E. The construction was under the supervision of the contractor's P.E. as well as Associated Engineers. Associated Engineers David Lamb P.E. inspected the dike on March 24, 2009.
5. The dike was inspected by David Lamb P.E. on March 24, 2009. The inspection noted several erosion locations due to a lack of a permanent stand of grass. Repair and reseeded will begin on or around July for erosion repair and reseeded will begin on or around September 2009 utilizing a contractor experienced in soil placement and reseeded. The pond is not currently impounding water. This impoundment along with the other two associated with the Coleman Power Plant will be inspected quarterly by Associated Engineers and plant employees monthly.
6. The impoundment has not yet been inspected by the State of Kentucky. The impoundment will not be used to impound water until the State of Kentucky completes the inspection.
7. No safety issues
8. The surface area is 64 acres. The storage capacity based on design is 3,900,000 cubic yards. The height of the dam is 34 feet.
9. No releases or spills
10. Big Rivers Electric Corp 201 Third Street Henderson Kentucky 42420 (owner)
Western Kentucky Energy Corp 145 N Main Street Henderson

If you have any additional questions or need additional information please contact me at tom.shaw@econ-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: *Pat Waldeck*
Name: PAT WALDECK
Title: GENERAL MANAGER

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:

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