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AEP Oklaunion Power Plant Vernon, Texas US EPA Inspection – February 2011 Action Plan based on Final Recommendations – February 12, 2012

AEP has reviewed the final report provided by Dewberry and Davis, LLC as part of their assessment of the ash impoundment facilities at the Oklaunion Power Plant.

AEP's comment is denoted in *italic* print after Dewberry and Davis's recommendation.

#### Recommendation

## 1.2.3 Recommendations Regarding the Supporting Technical Documentation

The following recommendation is warranted: if Pond 6 is to be closed the operator should provide a closure plan and schedule.

# Response:

AEP acknowledges this comment and will develop a closure plan and schedule in a timely manner after the final decision has been made to close the pond.

#### Recommendation

### 1.2.4 Recommendations Regarding the Maintenance and Methods of Operation

It is recommended that AEP develop and document a Maintenance and Methods of Operation Procedure, including checklists, or, as stated in Section 1.2.3, the plant should provide a closure plan and schedule for Pond 6.

### Response:

AEP will develop and document a Maintenance and Methods Operation Plan. The Plan will include checklists as recommended. The Maintenance and Methods of Operation Plan will be developed in lieu of the optional closure plan and schedule by September 30, 2012.