

US EPA ARCHIVE DOCUMENT

## COMMENTS

Comments received for CHA Draft Report (*December 23, 2009*, CHA Project No. 20085.2050.1510) for the Assessment of Dam Safety of Coal Combustion Surface Impoundments Big Rivers Electric Corporation – Coleman Generating Station, Hawesville, KY. Comments include;

- EPA comments - None;
- KY DNR comments – email received on January 28, 2010; and
- Big Rivers Electric Corporation comments – letter received January 26, 2010.

Final Report  
Assessment of Dam Safety of Coal Combustion Surface Impoundments  
Big Rivers Electric Corporation – Coleman Generating Station  
Hawesville, KY

**Comments Received from the EPA  
In Response to CHA Draft Report dated December 23, 2009**

*None*

CHA Project No. 20085.2050.1510

Comments

EPA HQ – None.

EPA Region – None.

State - See attachment from email dated January 28, 2010.

Company – See attached letter from Thomas Shaw dated January 26, 2010.

Final Report  
Assessment of Dam Safety of Coal Combustion Surface Impoundments  
Big Rivers Electric Corporation – Coleman Generating Station  
Hawesville, KY

**Comments Received from the KYDEP**  
**In Response to CHA Draft Report dated December 23, 2009**  
*Email Received January 28, 2010*

CHA Project No. 20085.2050.1510

From: "Phelps, Scott (EEC)" <Scott.Phelps@ky.gov>  
To: James Kohler/DC/USEPA/US@EPA  
Date: 01/28/2010 09:20 AM  
Subject: Comments from Kentucky on Ash Pond Reports

James

I am attaching our comments on the draft reports that were sent to me. It is my understanding that Gary Wells with our office has already supplied comments on the LG&E Mill Creek impoundment. Let me know if you need further clarification or anything else.

**Scott Phelps P.E., C.F.M., Supervisor  
Dam Safety and Floodplain  
Compliance Section  
Water Infrastructure Branch**

Attachment:

Comments on Ash Pond inspections located within Kentucky.

General: Kentucky would like to correct a statement made in several of the draft reports. Many of the reports state that Kentucky does not have standards for dam stability. This statement is incorrect and should be corrected in all reports. The standards are clearly stated in "Guidelines for the Geotechnical Investigation and Analysis of Existing Earth Dams". This publication is located on our website and available for download. The necessary factors of safety are found on page 25. The web address for the document is: <http://www.water.ky.gov/damsafety/dsdownloads/>

**E.W. Brown Aux Pond.**

The statement that the ash pond has a permit number KYDW Permit 1213 is incorrect. The Kentucky Division of Water has assigned dam ID number KY1213 to this structure. This is the number that the structure can be found under in the NID.

**E.W. Brown Main Pond**

3.2 Summary of Local, State and Federal Environmental Permits:

The statement that the ash pond has a permit number KYDW Permit 0737 is incorrect. The Kentucky Division of Water has assigned dam ID number KY0737 to this structure. This is the number that the structure can be found under in the NID.

## Kentucky Utilities Ghent Power Plant

1.2.1 There is no mention of permits issued by the Kentucky Division of Water for Construction of ATB 2 or the Gypsum Stacking Facility.

### 3.3 Structural Adequacy & Stability

The statement that Kentucky regulations and guidelines for dam safety do not provide specific factors of safety for slope stability is incorrect. The standards are clearly stated in “Guidelines for the Geotechnical Investigation and Analysis of Existing Earth Dams”. This publication is located on our website and available for download. The necessary factors of safety are found on page 25. The web address for the document is:

<http://www.water.ky.gov/damsafety/dsdownloads/>

## LG&E Cane Run

The map on page 9 indicates the wrong plant and places the plant in Indiana.

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### 4.1 Acknowledement of Management Unit Condition

## Big Rivers Coleman Plant

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<http://www.water.ky.gov/damsafety/dsdownloads/>

Big Rivers Reid, Green, HMPL

No comments from Kentucky Division of Water.

American Electric Power Big Sandy Generating Station

P.1 Company or Organization

The Kentucky Department of Natural Resources is a different agency than the Department for Environmental Protection. DEP is the correct agency for Scott Phelps.

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**Comments Received from Big Rivers Electric Corporation  
In Response to CHA Draft Report dated December 23, 2009**  
*Letter Received January 26, 2010*

CHA Project No. 20085.2050.1510



201 Third Street  
P.O. Box 24  
Henderson, KY 42419-0024  
270-827-2561  
[www.bigrivers.com](http://www.bigrivers.com)

CERTIFIED MAIL 7008 0150 0001 7512 9273

January 26, 2010

Mr. Jim Kohler, PE  
Office of Resources Conservation and Recovery (5304P)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, D.C. 20460

RE: Draft Assessment Report for Big Rivers Electric Corporation's Coleman facility response.

Dear Mr. Kohler:

Big Rivers Electric Corporation (BREC) appreciates the opportunity to provide comments on the Draft Assessment Report for the Coleman facility. BREC has identified the following corrections:

- Please change "Big Rivers Electric Cooperative" as found on page 1 and through out the report to Big Rivers Electric Corporation.
- On page 21 the last paragraph, fourth sentence starting with "This structure ...; however this structure is (no) longer actively controlling a water level." The word (no) is missing from the sentence.

BREC is reviewing the recommendations found in section 4.0 and will develop a plan to address each of the recommendations. If you have additional questions concerning the corrections provided please feel free to contact me at 270-844-6031 or by e-mail at [tom.shaw@bigrivers.com](mailto:tom.shaw@bigrivers.com).

Sincerely,

Thomas Shaw  
Manager Environmental Service  
Big Rivers Electric Corporation