US EPA ARCHIVE DOCUMENT

EAST KENTUCKY POWER COOPERATIVE

February 13, 2012

Via Email and US Certified Mail

Mr. Stephen Hoffman
U.S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: East Kentucky Power Cooperative, Inc.
H.L. Spurlock Power Station
Request for Action Plan for CCR Impoundment

Dear Mr. Hoffman:

EKPC requests EPA's consideration for the proposed Action Plan in regards to the coal combustion surface impoundment at H.L. Spurlock Power Station. Enclosed are our responses to the recommendations made by EPA's engineering contractor in Enclosure 2 dated January 12, 2012.

East Kentucky Power addressed each of the recommendations made in the final report. EKPC agrees with the EPA and engineering contractor and has taken immediate action by implementing the EPA recommendations.

East Kentucky Power Cooperative appreciates the cooperation of EPA and its engineering contractor through this process. If you have any questions regarding our responses, please contact me at 859.745.9244.

Sincerely,

Jerry Purvis
Director, Environmental Affairs

cc. Joseph VonDerHaar
Larry Morris
Craig Johnson
Brad Condley

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East Kentucky Power Coop Inc - H. L. Spurlock Power Station Recommendation Responses

1.2 RECOMMENDATIONS

1.2.1 Recommendations Regarding the Field Observations

Re-grading the low-lying areas that are collecting natural precipitation will reduce the potential for the ponding of water around the dam embankment, as mentioned in Section 1.1.5.

EKPC Response: *EKPC will re-grade low-lying areas on the north side of the dam as mentioned in Section 1.1.5 by September 1, 2012. This will allow for re-grading to occur during dry weather and prevent further damaging the area during the re-grading. EKPC will monitor this area during the quarterly inspections until the re-grading is completed.*

1.2.2 Recommendations Regarding the Maintenance and Methods of Operation

These recommendations should improve the safety and operation of the dike system:
As recommended within the S&ME Instrumentation Report's recent recommendations (See Appendix A, Doc 03 of the final report), all of the instruments are to be checked on a quarterly basis at a minimum.

EKPC Response: *The S&ME Instrumentation Report (Appendix A, Doc 03 of the final report) recommended the instruments to be checked on a quarterly basis. The instruments (piezometers and inclinometers) were checked on a quarterly basis for the first year after installation. The surface survey monuments were checked semi-annually for the first year after installation. Since no movement (outside of surveying and instrument tolerances) was detected during the monitoring, EKPC began to monitor all instrumentation and monuments annually. The 2011 annual inspection was performed by Tim Oakes, P.E. with Kenvirons, Inc., and again showed no movement (outside of surveying and instrument tolerances).*

In response to EPA's recommendations, EKPC will monitor the instruments (piezometers and inclinometers) semi-annually for 2012 and 2013. This monitoring will be performed by a third party consulting engineer and provided to EKPC in an engineering report. The consulting engineer will collect the data from the instruments as described in the S&ME Instrumentation Report (Appendix A, Doc 03 of the final report). If this data continues to indicate no movement, EKPC will revert to annual monitoring of the instruments in 2014. EKPC will continue to monitor the surface survey monuments annually. This monitoring will be performed by a third party consulting engineer and provided to EKPC in an engineering report. The consulting engineer will collect the data as described in the S&ME Instrumentation Report (Appendix A, Doc 03 of the final report). If any of the monitoring indicates movement, EKPC will increase the frequency of the monitoring as recommended by the consulting engineer.

Maintenance staff at the plant should continue to monitor the area in the southeast corner of the outside embankment associated with the adjacent ditch along the railroad and possible beaver habitat in the area as well as the toe of the northern embankment as mentioned in Section 1.1.5 and 1.2.1, for signs of flow, leaks, or change in water color or clarity.

EKPC Response: *Operations staff will continue to monitor this area daily as they monitor the rest of the dam. Also, EKPC will continue to monitor this area during the quarterly inspection performed internally by a professional engineer. The quarterly inspections are recorded and stored in Spurlock Power Stations completed work order database. Also, this area will be monitored on an annual basis by a third party consulting engineer and recorded in an engineering report provided by the consulting engineer.*