

US EPA ARCHIVE DOCUMENT



AMERICAN ELECTRIC POWER – TANNER'S CREEK FACILITY

**FLY ASH POND
BOTTOM ASH COMPLEX**

DRAFT REPORT COMMENTS

EPA Comments

None

Global EPA Comments

From: Hoffman.Stephen@epamail.epa.gov [mailto:Hoffman.Stephen@epamail.epa.gov]
Sent: Thursday, July 23, 2009 11:09 AM
To: Miller, Dennis A; Killeen, Deborah A
Cc: Ur.Nancy@epamail.epa.gov; Kane.Gloria@epamail.epa.gov; Zownir.Andy@epamail.epa.gov
Subject: TDF 5

The TVA failure mode analysis report for the Kingston embankment failure was made public several weeks ago. One of the key findings was that the unit may have failed because the embankment was built upon coal ash slimes. I am directing LM to contact all of its subs and have them reassess each of the draft reports it has already completed and have them answer the following questions for each facility and unit studied:

- * Concerning the embankment foundation, was the embankment construction built over wet ash, slag, or other unsuitable materials? If there is no information just note that.

- * Did the dam assessor meet with, or have documentation from, the design Engineer-of-Record concerning the foundation preparation?

- * From the site visit or from photographic documentation, was there evidence of prior releases, failures, or patchwork on the dikes?

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State Comments

None

American Electric Power Comments

| From: |
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Stephen Hoffman/DC/USEPA/US@EPA
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08/07/2009 03:39 PM
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| Subject: |
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September 11, 2009

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|Re: AEP Tanners Creek

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Steve, we have reviewed the reports and offer the following comments. I am also including several photos that show the completion of work for the fly ash pond "Upper Pond Seepage Collection System" as referenced in the O'Brien & Gere Assessment Report.

Fly Ash Pond Report

1. Comment: Figure 1 is a Location Plan showing the Bottom Ash Pond area instead of the Fly Ash Pond. It should be corrected.
2. Clarification: Section 3.1.2 - Fourth Bullet Item on Page 8 - The rip rap work was done in 2008 and 2009 - not 2006.
3. Clerical: Section 3 contains two (2) Tables - both are labeled as Table 2.
4. Clarification: Section 3.1.3 Paragraph 1 indicates that records of piezometric data were not provided during the inspection - Our records indicate that Document AEPTC002260 (Piezometer Location Plan) and AEPTC002261 (Piezometer Data) were provided to the O'Brien & Gere inspectors during the site visitation. Additional copies can be forwarded upon request.

Bottom Ash Complex Report

1. Comment: Section 3.1.3 - Second Paragraph - We disagree with the statement "Measurements from these piezometers will not likely provide data to show the effectiveness of the seepage collection system." Historic water level readings at the monitoring wells before and after the installation of the drain have shown the lowering of the phreatic surface as a result of the installation of the seepage collection system. The phreatic surface remains depressed because the drain continues to function as intended. If the drain begins to fail, the water levels in the piezometers will begin to rise giving an early warning that maintenance (flushing) of the collection system may be needed. To date, historic water level readings at the monitoring wells show a steady state of the phreatic surface. On this basis, we believe the readings from the piezometers are a good indicator of the effectiveness of the seepage collection system.
2. Comment: Section 4.2 - Second Bullet Item - While it is agreed that there is some localized erosion and sloughing, the overall dike is fairly uniform from end to end with no signs of bulges and cracks or depressions that would indicate instability by exhibiting nonuniformity of the slopes.
3. Comment: Section 4.2 - Last Bullet Item on Page 9 - 100' is more correctly 20'.

Thanks for the opportunity to provide these comments on the draft and we look forward to soon receiving the draft report for Gavin Plant.

Alan R. Wood, PE
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