Comments on Draft report for Duke Energy – Edwardsport Generating Station

EPA: None

Notes:

No stormwater calculations, hydrologic/hydraulic analyses or historic operating pool records were provided for review.

State: None

Company: See letter attached dated January 18, 2011

CORPORATE EHS SERVICES

Duke Energy Corporation
526 South Church St.
Charlotte, NC 28202

Mailing Address:
EC13K/PO Box 1006
Charlotte, NC 28201-1006

Via E-Mail and Overnight Courier

January 18, 2011

Mr. Stephen Hoffman
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-237
Arlington, VA 22202-2733

Re: Draft Dam Safety Assessment of CCW Impoundments
Edwardsport Generating Station
15400 East Villwock Road
Edwardsport, Indiana 47528

Dear Mr. Hoffman:

Duke Energy Indiana, Inc. received and has reviewed the draft report for Edwardsport Generating Station that resulted from the site assessment of the Primary Ash Pond and Secondary Ash Pond conducted by the United States Environmental Protection Agency (EPA) and its engineering contractors on August 9 and 10, 2010. Duke Energy supports the EPA's objective to ensure ash basin dam safety and remains committed to the safe operation and maintenance of coal ash basins.

Duke Energy remains committed to meeting all state and federal requirements and managing its coal combustion byproducts impoundments in a safe and responsible manner. Based on ongoing monitoring, maintenance and inspections, Duke Energy is confident that the ash ponds have the structural integrity necessary to protect the public and the environment.

After reviewing the draft "Dam Safety Assessment of CCW Impoundments" report for Edwardsport Generating Station, Duke Energy offers the following comments:

Section 1.2 Project Purpose and Scope

The third sentence of the second paragraph (page 2) states the following, "The pond area will then be used only for stormwater runoff from the coal yard and the new plant site."

Duke Energy would like to delete this sentence and substitute the following. "The pond area will then no longer be used for CCW management."

Section 2.2 Hazard Potential Classification

The final paragraph of the section states, "Based on the checklist definitions and as a result of this assessment, the hazard potential rating recommended for the Edwardsport Primary and Secondary Ash Ponds is SIGNIFICANT."

Once CCW is no longer being discharged into the pond area and CCW removal is complete, the potential for environmental damage described as the reason for a "significant" hazard potential rating will no longer be present and the hazard potential rating should be reduced to "low." Further, once the CCW has been removed the pond area will no longer be a CCW impoundment.

Section 3.2 Previous Inspections

"Duke Power" should be replaced with "Duke Energy."

Section 4.2 Summary of Findings

The first bullet under Primary Ash Pond, "Sluiced CCW by-product and coal yard runoff enters the pond near the northwest corner and is routed to the south end of the pond through a shallow ditch that has been excavated into the accumulated bottom ash deposits adjacent to the western dike."

The word "northwest" should be replaced with "northeast."

If you have any questions regarding these comments or need additional information, please contact me at 980-373-3719.

Sincerely,

D. Edwin M. Sullivan

D. Edwin M. Sullivan, PE
Corporate EHS Services