Comments on Draft Report on Duke Energy- Gallagher Generating Station

EPA: None

Slope stability analyses may have been completed by Sargent & Lundy during the original design of the impoundment embankments; however, Duke Energy was not able to retrieve any of this information prior to the issuance of this report.

State: None

Company: See letter 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 Report
Gallagher Generating Station
30 Jackson Street
New Albany, Indiana 47150

Dear Mr. Hoffman:

Duke Energy Indiana, Inc. received and has reviewed the draft report for Gallagher Generating Station that resulted from the site assessment of Ash Pond A and Secondary Pond conducted by the United States Environmental Protection Agency (EPA) and its engineering contractors on August 12 and 13, 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 Gallagher Generating Station, Duke Energy offers the following comments:

**Section 2.1 General**

In the third sentence the report states that the generating station was commissioned in 1970. The first unit at Gallagher Station actually went online in 1958.

**Section 2.2.2 Secondary Pond**

In the next to last sentence the statement, "...either recirculated by the Station or..." should be deleted. Water is not recirculated from the Secondary Pond.

**Section 2.3 Hazard Potential Classification**

In the second sentence of the second paragraph the following statement is made, "...the hazard potential rating recommended for Ash Pond A is Significant due to the potential for flooding of Route 111 in the event of a failure of the western embankment and the potential for overtopping and failure of the eastern embankment of the Secondary Pond in the event of a failure of the separation dike."

No inundation analysis has been completed for the pond system. If analysis shows that in the event of a failure flooding of Route 111 and overtopping and failure of the eastern embankment of the Secondary Pond would not occur then Ash Pond A should be given a Low Hazard Potential classification.

**Section 3.2 Engineering Documents- Ash Pond A**

The first bullet point states that, "Ash Pond A was constructed in the 1972/1973 time frame." Ash Pond A was commissioned in 1970.

**Section 6.4 Time Frame for Completion of Repairs/Improvements**

It is recommended in this section that, "...hydrologic/hydraulic and stability analyses for Ash Pond A and the Secondary Pond be undertaken within the next 6 months." and "...improvements be implemented within 12 months."

Duke Energy requests that the recommendation be changed to read, "Duke Energy should retain a geotechnical consultant within 6 months of the final issuance of this report to conduct a hydrologic/hydraulic and stability analyses for Ash Pond A and the Secondary Ash Pond." and "...a plan of action be developed based on any findings of the consultant's investigation and the future plans for the Gallagher Station ash ponds." The schedule as proposed is unwarranted as there are no significant concerns identified with respect to the stability of the structures and setting a completion schedule for potential repairs or improvements before those repairs/improvements are identified is premature. The ash ponds were designed by Sargent and Lundy, a very reputable engineering firm, and despite the lack of readily available documentation, there is a high degree of confidence that the ponds were designed appropriately.

**Appendix B Photo Number 1**

The caption for the photo reads, "Flow control weir on Primary Pond outlet channel (inlet to Ash Pond A)". It is a floating skimmer shown in the photo, not a flow control weir.

**Appendix C Photo Number 7**

The caption for the photo reads, "Tie-in of separation dike and eastern embankment to natural ground at the south end of the Secondary Pond." The words "natural ground" should be deleted for accuracy.

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