UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 15 2009

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Mr. Allen Wood
American Electric Power
1 Riverside Plaza,
Columbus, Ohio 43215-2373

Dear Mr. Wood,

On June 1-2, 2009 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a site assessment of the fly ash and bottom ash ponds at the Tanners Creek facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled coal combustion residuals (CCRs). We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the Tanners Creek facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report .

The final report for the Tanners Creek facility is enclosed. This report includes a specific rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the Tanners Creek facility. These recommendations are found on pages 11-12 in the final assessment report and are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please explain why. Please provide a response to this request within 14 calendar days of receipt of this letter. Please send your response to:

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

If you are using overnight of hand delivery mail, please use the following address:

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

You may also provide a response by e-mail to hoffman.stephen@epa.gov

This request has been approved by the Office of Management and Budget under EPA ICR Number 2350.01.

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as "confidential" you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued ongoing efforts to ensure protection of human health and the environment.

Sincerely,

Matt Hale

Matt Hale, Director
Office of Resource Conservation and Recovery

Enclosures

Enclosure 2
Tanners Creek Recommendations

Fly Ash:

6.1. Immediate/Urgent Repair Recommendations

No immediate or urgent repairs are recommended at this time.

6.2. Long Term Improvements

A slotted pipe toe drain system is currently being installed to replace the drainage ditch which currently collects seepage from the Upper Pond. The owner should continue as planned with this modification to improve the conveyance of water away from the toe.

Beyond completing the slotted pipe toe drain system, no other long term improvements are recommended at this time.

6.3. Monitoring and Future Inspection Recommendations

Monitoring and future inspections should continue on their current schedule. For future monthly inspections, additional detail regarding visual observations made at the time of inspection should be included.

Additionally, active maintenance of the vegetative growth around the Fly Ash Pond will need to continue along with regular filling of rodent burrows.

6.4. Time Frame for completion of Repairs/Improvements

The owner cited a 2009 completion date for the installation of the remainder of the slotted drain pipe system. The owner should continue toward completion of this project as planned.

Bottom Ash:

6.1. Immediate/Urgent Repair Recommendations

No immediate or urgent repairs are recommended at this time.

6.2. Long Term Improvements

The owner should proceed as planned with installation of the proposed French drain to control seepage in the west dike and increase its stability. This seepage collection system is scheduled to be installed in the west dike embankment later in 2009.

Woody vegetation should be removed from the in-board slopes of the dikes and kept from reestablishing growth. Active maintenance of the vegetative growth should continue along with regular filling of rodent burrows.

Beyond the items noted above, no other long term improvements are recommended at this time.

6.3. Monitoring and Future Inspection Recommendations

Monitoring and future inspections should continue on their current schedule. For future monthly inspections, additional detail regarding visual observations made at the time of inspection should be included.

Monitoring of the two isolated seeps noted along the east dike embankment should continue with the monthly inspections performed by the plant. These items have been noted in previous annual inspections and methods to repair these locations should be investigated in the event that these seeps worsen and immediate repair is needed.

6.4. Time Frame for completion of Repairs/Improvements

The owner cited a 2009 completion date for the installation of the west dike seepage collection system. The owner should continue toward completion of this project as planned.

The isolated seeps on the east dike embankment should continue to be monitored. In the event these areas are observed to worsen, they should be repaired immediately.