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VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED

September 28, 2009

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

RE: Plan for Addressing Recommendations in Site Assessment Report
Louisville Gas and Electric Company
Trimble County Power Station Bottom Ash Pond

Dear Mr. Hoffman:

This is a response on behalf of Louisville Gas and Electric Company (LG&E) to EPA's September 15, 2009 letter requesting LG&E inform you of our plans to address the recommendations in EPA's site assessment report for the Trimble County Station Bottom Ash Pond. Specifically, this response covers how LG&E intends to address the recommendations made by EPA and its engineering contractors, O'Brien & Gere as a result of a site assessment conducted at the Trimble County facility on June 1, 2009. LG&E has reviewed the recommendations and intends to address each of the recommendations to ensure the continued stability of the CCR impoundment at the Trimble County facility. The attached (Table 1) identifies the specific plans and schedules for implementing each of the recommendations.

Please contact Mike Winkler at (502) 627-2338 or Michael.Winkler@eon-us.com if you have any questions regarding this response.

Sincerely,

Louisville Gas and Electric Company
Plan for Addressing Recommendations in Site Assessment Report
Louisville Gas and Electric Company – Trimble County Power Station Bottom Ash Pond

Table 1

Recommendation from EPA and O'Brien & Gere RE: Trimble County Power Station Bottom Ash Pond (BAP) Site Assessment, June 1, 2009 - maintenance items that do not require immediate attention			
	Recommendation	Implementation Plan	Implementation Schedule
1	Upstream slope - repair eroded and sloughed areas near the top of the east and south embankments. Repairs should be completed in accordance with an engineered design . Consider armoring of upper portion of interior eastern and southern slopes to protect against wave action erosion.	LG&E has retained the Professional Engineer of Record, MACTEC Engineering and Consulting to engineer and develop any necessary work plans related to recommendations 1 thru 3. After engineering is completed and work plans are developed LG&E will implement work plan using our vertical extension project contractor (Riverside Group) and complete the work plans as weather conditions permit.	June, 2010
2	Embankment Crest - regrade crest to divert runoff into pond, fill low areas to establish a uniform crest elevation and to avoid concentrated channeling of runoff. Grade crest to promote sheet flow. Stabilize areas of crest where vehicle or equipment will travel or in material laydown areas to avoid rutting of soft surface soils and creation of poorly drained areas.		
3	Downstream slopes - fill erosion gullies on downstream slopes of the north, east, and west embankments. Repair sloughs, and re-grade irregular areas of slopes to avoid concentrated runoff channels or saturation of portions of slope. Repairs should be performed in accordance with an engineered design. Place turf reinforcement erosion control matting over repaired areas to reduce the potential for future erosion gullies.		
4	Continue participation in state bi-annual inspections	LG&E will continue to participate in inspections from the State of Kentucky Department of Environmental Protection-Dam Safety and Floodplain Compliance Section.	Next state inspection expected in June 2011 and bi-annually thereafter
5	Consideration should be given to independent inspections, such as the one conducted by ATC Associates, Inc., by licensed dam safety engineers on at least a bi-annual basis.	An independent inspection is expected to be completed by ATC Associates this year. LG&E is considering future periodic inspections of the facility by independent licensed professional engineers with expertise in dam safety.	Inspection field work complete by November 15, 2009
6	Consideration should be given to development of an O&M Plan that would establish a firm schedule for operations, maintenance, and inspection activities.	LG&E is currently considering development of Operations and Maintenance Plans for the Trimble County Bottom Ash Pond.	December, 2009
7	Monitor minor seepage/wetness at the downstream toe of the south embankment for increased seepage volume, transport of fine-grained soils, or other changed conditions that may indicate a potential problem.	LG&E personnel responsible for the maintenance and operation of the Bottom Ash Pond monitor this area twice per day.	Monitoring Ongoing
8	Installation of a small gravel blanket drain in the area with an outlet channel or pipe to help alleviate poor drainage conditions and provide a means to measure seepage flow rate at a convenient discharge point.	LG&E has retained the Professional Engineer of Record, MACTEC Engineering and Consulting to engineer and develop any necessary work plans related to recommendations 8 and 9. After engineering is completed and work plans are developed LG&E will implement work plan using our vertical extension project contractor (Riverside Group) and complete the work plans as weather conditions permit.	June, 2010
9	Consideration should be given to installing permanent piezometers at critical sections within each embankment. Consult engineer of record regarding the location, depths, and types of piezometers instrumentation to be installed and the frequency of monitoring.		