Comments on draft Report- Vectren Corp.- F.B. Culley Generating Station

EPA: None

Note - During the site assessment, no documents relating to a hydrologic study, hydraulic design calculations and assumption, or dam break analyses were provided for review.
It is unknown what the designed inflow, capacity of the ponds, freeboard, or other important components of the impoundment designs are without these studies and documents.

State: None

Company: See attached letter dated December 22, 2010

VECTREN

Vectren Corporation
P.O. Box 209
Evansville, Indiana 47702-0209

December 22. 2010
Submitted via e-mail

Mr. Stephen Hoffman
Office of Resource Conservation and Recovery (5304P)
US Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

RE: Coal Ash Impoundment Assessment draft prepared by Kleinfelder

Dear Mr. Hoffman:

SIGECO (dba Vectren) would like to thank you for the opportunity to review the draft reports for the Coal Ash Impoundment Site Assessment for our F. B. Culley Generating Station prepared by Kleinfelder. We feel it is in the best interest of both the company and EPA to insure that all public information is as accurate as possible. SIGECO understands that our input is limited solely to factual corrections and clarifications.

Overall we feel the Assessments for both impoundments were fair and accurate. Areas of the assessments that we feel need clarification or correction are as follows:

- Last sentence on the top of page 8: We would like to clarify the statement which mentions a "neighboring industrial site" to read: "A neighboring coal fired generating station, of which Vectren is the co-owner of one of the units, discharged the Vectren share of fly and bottom ash into the west pond until 2007 when the ash line was removed from service to facilitate construction which occurred at the neighboring site."

- Section 4.3 and 7. During the visit, Kleinfelder was provided with the page from the plant EAP that specifically mentioned the Ash Ponds. The complete EAP for the plant was available but it was not requested.

  We feel the discussion and recommendation for "An Emergency Action Plan (EAP) …to mitigate damage in the event of an emergency related to failure of the impoundment" is a misnomer. The EAP is an OSHA requirement and focuses on protection of worker health and safety in emergency situations. We are not aware of any regulatory program, OSHA or otherwise, that describes or requires a mitigation plan for a breach from an impoundment. Further, as stated in section 3.4, the pond embankments are not even defined as jurisdictional dams nor are they regulated by a state agency.

We can provide a copy of the full EAP for the site as stated in Section 7.2, question 5 but request that the reference in section 5.1 to an EAP that describes the mitigation of a pond failure be removed since that is not the purpose of an EAP.

- The report is missing a section #6. The last four sections of the report should be renumbered 6 thru 9.

- Although the report lists a date of September 2010, we did not receive the report until November 30, 2010 with a 30 day review and comment period. The action date for many items listed in section 7 is December 31, 2010 which is not reasonable or attainable. It appears that the original intention was to allow 3 to 6 months for a response time so we request the following date changes in section 7 : December 31, 2010 action dates moved to March 31, 2011; the March 1, 2011 action date moved to June 1, 2011; and the July 1, 2011 action date moved to October 1, 2011.

Thank-you again for the opportunity to review the report prior to issuing the final assessment. Please contact me at 812-491-4666 or lmessinger@vectren.com if you have any further questions.

Sincerely,

Lisa C. Messinger

Lisa C. Messinger, CHMM
Manager, Utility Environmental Compliance

Cc: K. Farrar, plant copy
D. Bryenton
File