VECTREN

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September 30, 2009
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: Dam Assessment Reports received September 16, 2009

Dear Mr. Hoffman:

SIGECO (dba Vectren) provides the following response to recommendations listed in the Dam Site Assessments for our A. B. Brown Generating Station prepared by O'Brien and Gere.

Lower Ash Pond-

6.2 Long Term Improvement/Maintenance Items

1) Chronology documentation of the seepage mitigations issue is being developed with an expected completion date on or before October 30, 2009
2) An improved drainage system for the lower dam berm area is in the final stages of design. Installation is expected to be completed before January 30, 2010.
3) We are evaluating mechanical and chemical methods of controlling the phragmites at water's edge. Evaluation should be completed by March 30, 2010. The trees at the lower downstream slope and south of the principal spillway appear to be part of the original topography of the area. Removal of these trees and their root systems may damage the established grade and drainage of the base of the dam. Evaluation of the removal benefit will involve discussions with our consultant, ATC Associates, and IDNR representatives. We expect completion before March 30, 2010.
4) We will ask our consultant to evaluate the benefit of this review. Completion of evaluation is expected by June 30, 2010.
5) The utility pole has lighting for illumination of the coal pile for safe after dark operations. The pole is to remain to facilitate the safety of coal pile operations.

6.3 Monitoring and Future Inspection

We will contract with our consultant to evaluate the piezometers. Completion of this evaluation is expected by June 30, 2010.

A dam safety inspection program, as discussed during the inspection visit, was established in March 2009. Quarterly visual inspections are performed by plant personnel with annual inspections are performed by our ash pond dam consultant.

Upper Ash Pond-

6.4 Long Term Improvement/Maintenance Items

1) During the next scheduled quarterly inspection (September 2009) the repairs to the erosion areas noted in the Assessment will be evaluated for effectiveness. If additional repairs are required based on the inspection, they will be completed before the fourth quarter inspection (December 2009). Quarterly inspections will specifically include follow-up observations for the areas of repair from prior quarter inspection reports.
2) Inspection of the upper dam area will be added to our Emergency Action Plan for inspection after a seismic event. Completion of the revision is expected by October 30, 2009.
3) Vegetation noted during the June inspections has already been removed. Review of this area has been added to the quarterly inspection reports. Based on observations of growth during future inspections, this area may be added to a vegetation maintenance schedule or handled on an as-needed basis.

6.3 Monitoring and Future Inspection

The elevation is already recorded annually to check for settlement of the upper dam. This information will be added to the annual inspection report conducted by our outside consultant.

We have added a specific line item to our quarterly inspection forms that addresses the review the edge of the scrubber blowdown (waste sump discharge) channel.

Thank you again for the opportunity to reply to the recommendations in the final assessments. 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
Sr. Environmental Scientist

Cc: R. Simon, plant copy
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