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

AUG 13 2013

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

Mr. Tom Easterly
Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
100 N. Senate Ave.
Room IGCN 1301
Indianapolis, Indiana 46204

Dear Mr. Easterly:

I am writing to provide you with an update on the U.S. Environmental Protection Agency's (EPA) structural integrity assessments of the surface impoundments containing coal combustion residuals at electric utilities located in your state.

After the catastrophic release of coal ash from the Tennessee Valley Authority's Kingston, Tennessee facility in December 2008, the EPA, in collaboration with the states, undertook a nationwide comprehensive effort to assess the structural integrity of surface impoundments and similar units that contain coal combustion residuals. The purpose of the assessments was to determine whether the units are structurally stable or whether any corrective measures were needed, and, if so, to work with each facility to secure its commitment to complete any necessary corrective measures. We thank you for your assistance and support throughout this process.

All above ground units with maximum embankment heights of greater than six (6) feet at facilities in your state have been assessed by experts in dam safety, working under the direction of the EPA. Each facility has received or will shortly receive, a final report containing recommendations for corrective measures or studies needed to ensure the ongoing structural integrity of their impoundments and each facility has submitted an action plan to the EPA setting out how they plan to implement the recommendations.[1] The EPA's assessment effort was an extraordinary effort undertaken due to the critical need to ensure the structural integrity of these units. The EPA was able to bring dam safety experts in quickly and to subject these units nationwide to the same scrutiny. The assessments, analyses, reports and recommendations constitute a critical body of information which serves all of us in our ongoing efforts to protect human health and the environment. For complete information on structural integrity assessments, analyses, reports, and recommendations, please visit the EPA's website at *http://www.epa.gov/osw/nonhaz/industrial/special/fossil/surveys2/*.

These assessments, however, reflect the condition of each unit at the point in time during which each assessment took place. Going forward, an ongoing routine program to assess these units and take any needed corrective measures is required to ensure the units' continued structural integrity. The continuing

[1] We invited representatives from your State to accompany EPA on the site assessments; we also provided the States an opportunity to submit comments on the draft reports and have provided the States a copy of the final report.

responsibility to ensure that these units are structurally sound lies first with each facility's owner and operator; however, you have an important role in monitoring and overseeing these units. We are therefore providing you this information to aid in your ongoing efforts.

We have enclosed a summary table for the facilities and units in your state. In addition, we will provide you with all the information from the EPA's assessment effort for each facility within your state for your use in the monitoring and oversight of these units. In those situations where we have not completed the assessment process for a particular unit, we will note that fact in the summary table. When we have completed the process, we will provide you all of the information on that unit. We would be happy to discuss any of this information with you and will provide the EPA contact when we forward you the detailed information. We also note that should the agency become aware of a situation where there is threat of release or other potential endangerment to human health or the environment, the EPA may take appropriate action. In such circumstances, the EPA will coordinate with you to ensure that measures protective of human health and the environment are taken in a timely fashion.

We again thank you for your cooperation throughout the assessment process and encourage you to continue your efforts to ensure the structural integrity of these units.

Sincerely,

Mathy Stanislaus

Mathy Stanislaus
Assistant Administrator

Enclosure

INDIANA

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Vectren	**A.B. Brown Generating Station (2)**	Yes	IN	**Lower Ash Pond Dam**	Significant	**Fair**
				Upper Ash Pond Dam	Significant	**Satisfactory**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Vectren	**F. B. Culley Power Station (2)**	Yes	IN	**East Pond**	Significant	**Fair**
				West Pond	Significant	**Fair**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
American Electric Power-Indiana Kentucky Electric Corporation	**Clifty Creek Generating Plant (2)**	Yes	IN	**West Bottom Ash Pond Dam**	Significant	**Satisfactory**
				South Fly Ash Pond Dam	Significant	**Satisfactory**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
American Electric Power	**Tanner Creek Power Plant (2)**	Yes	IN	**Bottom Ash Complex**	Significant	**Fair**
				Fly Ash Pond	Significant	**Satisfactory**

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Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Indianapolis Power & Light Co	**Petersburg Generating Station (4)**	Yes	IN	**Pond A - Active**	Significant	**Poor**
				Pond A - Discharge	Significant	**Poor**
				Pond B	Significant	**Poor**
				Pond C	Significant	**Poor**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Indianapolis Power & Light Co	**Eagle Valley Generating Station (5)**	Yes	IN	**A Pond**	Significant	**Poor**
				B Pond	Significant	**Poor**
				C Pond	Significant	**Poor**
				D Pond	High	**Poor**
				E Pond	Significant	**Poor**

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Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Indianapolis Power & Light Co	**Harding Street Power Station (6)**	Yes	IN	**Pond 1**	Significant	**Poor**
				Pond 2	High	**Poor**
				Pond 3	Significant	**Poor**
				Pond 4	High	**Poor**
				Ponds 2A/2B	Low	**Poor**
				Ponds 4A/4B	Low	**Poor**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Duke Energy Corp	**Gibson Generating Station (6)**	Yes	IN	**East Ash Pond #1**	Low	**Fair**
				East Ash Pond #2	Low	**Fair**
				East Ash Pond #3	Less than Low	**Fair**
				East Ash Pond Settling Basin	Low	**Fair**
				North Ash Pond	Low	**Fair**
				North Settling Basin	Low	**Fair**

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Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Northern Indiana Pub Serv Co*	R. M. Schahfer Power Station (10)	Yes	IN	FGD Landfill Stormwater Runoff Pond	Low	Poor
				Final Settling Basin	High	Poor
				Material Storage Runoff Basin	Significant	Poor
				Metal Cleaning Waste Basin	Significant	Poor
				Recycling Settling Basin	Significant	Poor
				Waste Disposal Area	Significant	Poor
				Yard Drain Stormwater Retention Pond	Low	Poor
				Intake Settling Basin	High	Poor
				Gypsum Storage A	Significant	Poor
				Gypsum Storage B	Significant	Poor

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Duke Energy Corp	Wabash River Power Station (4)	Yes	IN	Primary Ash Pond A	Significant	Fair
				Primary Ash Pond B	Significant	Fair
				Secondary Ash Pond	Significant	Fair
				South Ash Pond	Significant	Satisfactory

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Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Duke Energy Corp	**Cayuga Power Station (4)**	Yes	IN	**Ash Disposal Area #1**	Significant	**Poor**
				Lined Ash Disposal Pond - Cell #1	Significant	**Poor**
				Primary Ash Settling Basin	Significant	**Poor**
				Secondary Ash Settling Basin	Low	**Poor**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Duke Energy Corp	**Edwardsport Generating Station (2)**	Yes	IN	**Primary Ash Pond**	Significant	**Fair**
				Secondary Ash Pond	Significant	**Fair**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Hoosier Energy R E C Inc	**Frank E. Ratts Power Station (4)**	Yes	IN	**Bottom Ash Pond/Pond 4**	Significant	**Poor**
				Fly Ash Pond 1	Low	**Poor**
				Fly Ash Pond 2	Less than Low	**Poor**
				Fly Ash Pond 3	Less than Low	**Poor**

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Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
American Electric Power	**IN MI Power Co - Rockport Power Station (2)**	Yes	IN	**Bottom Ash Complex**	Low	**Satisfactory**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Duke Energy Corp	**R. Gallagher Power Station (2)**	Yes	IN	**Ash Pond A**	Significant	**Fair**
				Secondary Ash Pond	Low	**Fair**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Northern Indiana Pub Serv Co	**Bailly Generating Station (6)**	Yes	IN	**Bottom Ash Storage Area**	None	**Unrated**
				Forebay	None	**Unrated**
				Primary Settling Pond No. 1	None	**Unrated**
				Primary Settling Pond No. 2	None	**Unrated**
				Secondary Settling Pond No. 1	None	**Unrated**
				Secondary Settling Pond No. 2	None	**Unrated**
Note: Facility Impoundments were assessed, however all were found to be incised and therefore were outside of program scope; no ratings provided.						

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Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Northern Indiana Pub Serv Co	**Michigan City Generating Station (5)**	Yes	IN	**Final Settling Pond (FSP)**	Low	**Satisfactory**
				Primary Settling Pond No. 1	Significant	**Satisfactory**
				Primary Settling Pond No. 2	Significant	**Satisfactory**
				Secondary Settling Pond No. 1	Low	**Satisfactory**
				Secondary Settling Pond No. 2	Low	**Satisfactory**

Company	Facility (Number of Units)	Action Plan	State	Impoundment Name	Hazard Potential	Final Report Condition Rating
Northern Indiana Pub Serv Co	**D.H. Mitchell Generating Station (6)**	Yes	IN	**Primary Settling Basin No. 1**	Less than Low	**Unrated**
				Primary Settling Basin No. 2	Less than Low	**Unrated**
				Primary Settling Basin No. 3	Less than Low	**Unrated**
				Primary Settling Basin No. 4	Less than Low	**Unrated**
				Secondary Settling Basin No. 1	Less than Low	**Unrated**
				Secondary Settling Basin No. 2	Less than Low	**Unrated**
Note: Facility Impoundments were assessed, however were given no rating as they have been breached and are scheduled for deconstruction.						

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CONDITION RATINGS

The condition rating of an impoundment represents an assessment of the overall expected performance of the impoundment at the time of assessment considering all pertinent engineering conditions. Each impoundment at each facility was rated using the following categories:

Satisfactory
No existing or potential management unit safety deficiencies are recognized. Acceptable performance is expected under all applicable loading conditions (static, hydrologic, seismic) in accordance with the applicable criteria. Minor maintenance items may be required.

Fair
Acceptable performance is expected under all required loading conditions (static, hydrologic, seismic) in accordance with the applicable safety regulatory criteria. Minor deficiencies may exist that require remedial action and/or secondary studies or investigations.

Poor
A management unit safety deficiency is recognized for a required loading condition (static, hydrologic, seismic) in accordance with the applicable dam safety regulatory criteria. Remedial action is necessary. "Poor" also applies when further critical studies or investigations are needed to identify any potential dam safety deficiencies.

Unsatisfactory
Considered unsafe. A dam safety deficiency is recognized that requires immediate or emergency remedial action for problem resolution. Reservoir restrictions may be necessary.

HAZARD POTENTIAL RATINGS

The hazard potential ratings refer to the potential for loss of life or damage if there is a dam failure. The ratings do not refer to the structural stability of the dam. Specifically:

High Hazard Potential
Dams assigned the high hazard potential classification are those where failure or mis-operation will probably cause loss of human life.

Significant Hazard Potential
Dams assigned the significant hazard potential classification are those dams where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environment damage, disruption of lifeline facilities, or impact other concerns. Significant hazard potential classification dams are often located in predominantly rural or agricultural areas, but could be located in areas with population and significant infrastructure.

Low Hazard Potential
Dams assigned the low hazard potential classification are those where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the owner's property.

Less Than Low Hazard Potential
Dams which do not pose high, significant, or low hazard potential.