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February 5, 2015

Mr. Tom Easterly
Commissioner
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204

Dept. Of Environmental Management Commissioner's Office

AEP.com

American Electric Power 1 Riverside Plaza Columbus, OH 43215-2373

FEB 0 9 2015

Dear Mr. Easterly:

## RE: Shutdown of the Tanners Creek Power Plant in Lawrenceburg, IN

Tanners Creek Power Plant has a proud history of generating electricity for over 60 years in Dearborn County, meeting the environmental requirements along the way. As we plan for plant shutdown on May 31 we would appreciate being able to continue the dialogue with IDEM by meeting with your staff to describe our plans and our schedule.

The attached sketch shows the main facilities on site where we are focusing our efforts to achieve compliant shutdown and closeout. Our activities and planning center around:

- Closing in place the Stage I flyash pond, the main ash pond, the Units 1 3 bottom ash pond and clean closing the unit 4 slag pond, meeting IDEM's closure requirements and permitting protocol;
- Using up the remaining coal in the Units 1 3 and the Unit 4 coal pile, then cleaning those areas of the remaining coal, disposing of the cut material in the on-site Type I landfill if allowed by IDEM, then allowing the depressions to fill naturally with water as surface water features for possible future use in later site redevelopment;
- Performing the necessary draining of fluids at the plant building, closing out the RCRA storage areas, using lab reagents and disposing through Lab Packs the unused laboratory chemicals, shipping off site other industrial chemicals associated with past power production;
- Maintaining protective cover over asbestos-containing materials;
- Permitting with IDEM a new outfall at the Stage I Landfill to allow more efficient discharge of the landfill leachate through a new NPDES-permitted outfall;
- Modifying the NPDES permit to permit a new outfall at the location of the Unit 4 slag pond, to serve as a low volume wastewater consolidation point, to provide whatever treatment is needed for remaining wastewaters on the east end of the site, and to discharge the supernatant, and;
- Providing erosion control cover (soil and seed) over the area where Gibco operated to beneficially use the boiler slag coal combustion byproduct, which historically was packaged for sale as blasting grit.

Since Tanners Creek Plant will stop generating electricity before the final, federal coal combustion residual rule becomes effective, it will not be captured by the new, self-implementing rule. Our intention, both during the upcoming decommissioning phase and the subsequent demolition phase will be to meet all of the state environmental requirements. Being able to meet with your staff will allow us to convey our plans and to receive feedback so that the process is transparent and compliant. We will move to try to arrange those meetings, but initially wanted to provide you with this overview.

Very truly yours,

John M. McManus
VP Environmental Services
American Electric Power

cc: Mr. Doug Rosenberger – I&M Plant Manager

Mr. Tom Webb - Director, LERS