



Vectren Corporation

P.O. Box 209

Evansville, Indiana 47702-0209

March 20, 2009  
Certified Mail  
7008 0150 0003 5691 1581

Mr. Rich Kinch  
US EPA (5306P)  
1200 Pennsylvania Ave, NW  
Washington, DC 20460

RE: Section 104(e) Information Request on Ash Management Units for:  
Southern Indiana Gas and Electric Company – A. B. Brown Generating Station  
Southern Indiana Gas and Electric Company – F. B. Culley Generating Station


Dear Mr. Kinch:

Enclosed please find the certification statements from the Plant Directors for the above listed facilities along with the answers to the EPA questionnaire for each site. The A. B Brown Station did not actually receive an EPA request letter although they were on the list of facilities provided to USWAG and noted in the CEO letter for SIGECO. We feel this was an issue with the US Postal Service's inability to deliver mail to the plant physical address as opposed to the mailing address. We defaulted to the response time frame for our other facility.

Also enclosed is the CEO certification statement for Southern Indiana Gas and Electric Company verifying that both of our subject facilities were identified in the CEO notification list. The SIGECO parent company, Vectren Corporation, does have minority owner interest in the Warrick Generating Station in Newburgh, IN, but it is our understanding that the majority owner, ALCOA Generating Company, received a separate letter.

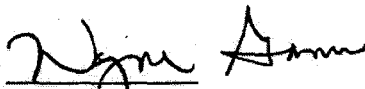
If you have any questions about the enclosures, you may contact Ms. Lisa Messinger, Sr. Environmental Scientist overseeing water and waste issues, at 812-491-4666.

Sincerely,

  
Angila M. Retherford  
Director of Environmental Affairs

Cc: W. Games, ABB  
S. Bradford, FBC  
File

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature:   
Name: Wayne Gomes  
Title: Director - AB Brown Gen Facility

This request has been reviewed and approved by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C., 3501-3520.

Please send your reply to:

Mr. Richard Kinch  
US Environmental Protection Agency (5306P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Richard Kinch  
US Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Dr.  
5th Floor; N-5783  
Arlington, VA 22202 2733

EPA expects the owners and operators of these units to exercise the utmost care and diligence in examining whether there are any potential concerns at the units and to take appropriate actions to address them. We ask that this effort be a priority at the highest levels of your organization to ensure the protection of public health, safety, and the environment.

Response to Information Request

Southern Indiana Gas and Electric Company – A. B. Brown Generating Station

The A. B. Brown Station has one ash management unit. The impoundment was formed by building a dam to block off the outlet of a natural ravine

1. The ash pond consists of two dams. The Lower dam has been classified by the Indiana DNR as a Significant Hazard (State ID# 65-7, permit # D-4405, rev 1). The Upper dam was not classified during the permitting process but has a permit # FW-21909. The Upper dam bi-sects the pond and both areas of the pond are hydraulically connected through an engineered water inlet pipe which maintains the upper pond at a pre-determined water level four feet below the height of the upper dam.
2. The Lower dam was built in 1978. The Upper dam was designed to be constructed in two phases. Phase 1 was constructed in 2002 and Phase 2 was constructed in 2007. The addition of the Upper dam allowed for better separation and management of the water and solids within the pond. During the Phase I construction of the Upper dam, an engineered spillway was added to the Lower dam.
3. No discernable amount of material has been removed from the pond since it first began operation in 1978. Liquid wastes that are sluiced into the pond include fly ash, bottom ash, boiler slag, FGD belt filter wash down and water sump wastes, pyrites, material removed from the coal pile run-off pond (once per year), plant floor drain wash downs, boiler chemical cleaning wastes (once per 7-8 years), reverse osmosis system rejects, and rainfall / runoff from the area surrounding the pond.

The construction of the Upper dam helped to insure the plant make-up water lines were not blocked by continually added ash. Since the construction of the Upper dam, the fly ash and bottom ash are sluiced exclusively to the pond behind the Upper dam. The design of the Upper dam allows for control of the water levels in both the Upper and the Lower portions of the pond.

4. We are not aware of a PE certification for the safety of the dam or the management unit. Both the Upper and Lower dams have construction drawings from an engineering company, but they are not stamped by a PE as there was no requirement in place at the time of construction.
5. An outside engineering firm, ATC Associates (Indianapolis, IN), has been contracted to perform a dam inspection the first week of April 2009. ATC was also the design engineer for the Upper dam. Historically water levels and surface conditions have been visually inspected once per day but a thorough dam inspection is not part of the visual review. During the inspection by ATC, personnel at the plant will be instructed on how to perform a proper dam inspection and going forward, in-house inspections will be conducted once per quarter. An outside engineer will be brought in once per year to conduct an independent inspection.

SIGECO – A. B Brown Station

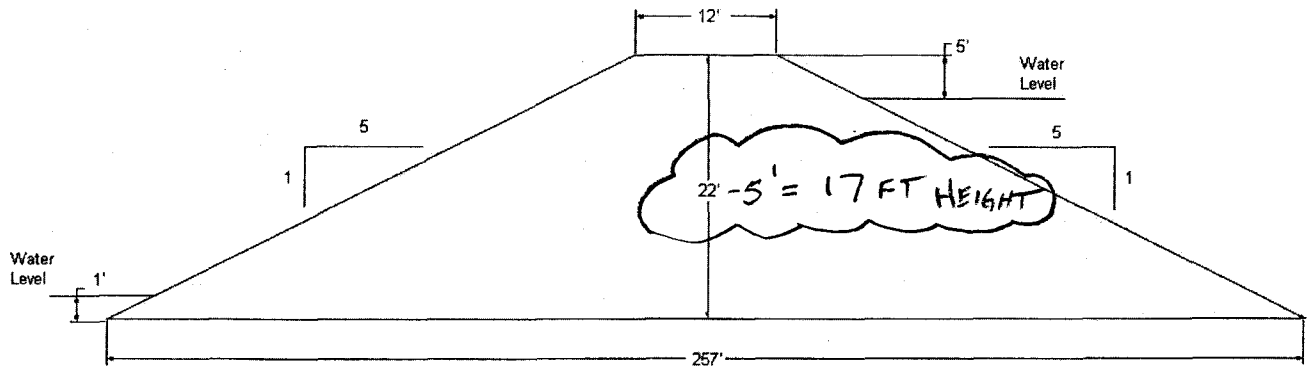
6. The last State inspection of the dam was conducted by the Indiana DNR - Division of Water on January 30, 2008. Minor maintenance issues such as overgrown vegetation on the slope and spillway were noted and corrected by the plant. A copy of the inspection report is attached. In reviewing prior inspection reports, it appears, the IDNR conducted a dam inspection once per 3-4 years.
7. No safety issues were uncovered during the 2008 IDNR inspection of the dam.
8. The overall acreage of the pond is 156 acres. The Lower dam is the original and primary dam for the impoundment. Of the 156 acres, roughly 53 acres is impounded behind the Lower dam with the remaining 103 acres impounded behind the second, Upper dam.

The overall storage capacity for the pond is 6.3 million cubic yards although due to operational constraints (ie. pump limitations and flowability of the ash) and the need to maintain a volume of free water to serve as the plant make-up water, the full storage capacity can not be reached. We calculate the usable storage capacity to be 5.4 million cubic yards, which is split 3.9 million cubic yards in the Upper pond and 1.5 million cubic yards in the Lower pond.

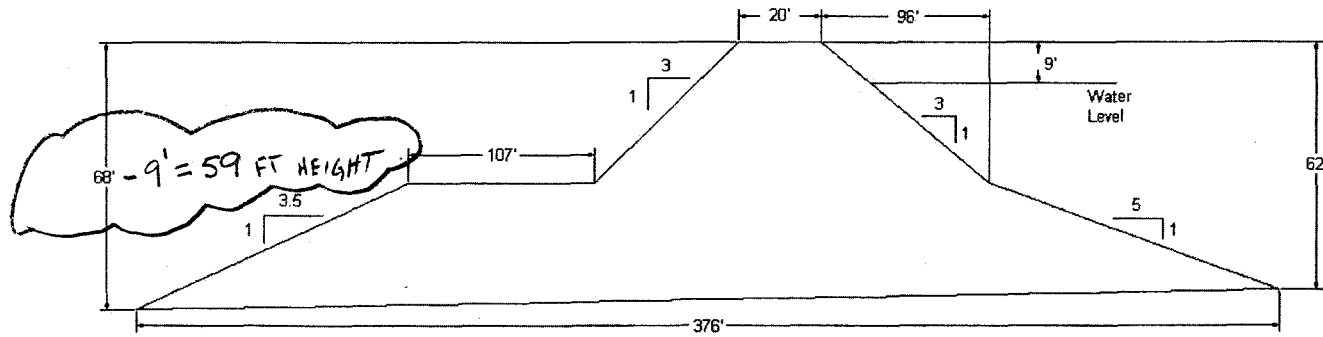
Based on the last volume measurement conducted in 2005 along with engineering calculations for the last three years, as of December 31, 2008, there is 2.9 million cubic yards of material in the Upper pond and 1.5 million cubic yards in the Lower pond.

9. No spills or unpermitted releases of ash from the pond have occurred with the last ten years.

Note: The site has six additional ponds which include storm water ponds, water flow surge basins, cooling tower blow down basins, and coal pile run-off ponds. These additional ponds are not included in the response because they are not designed to manage liquid wastes that include fly ash, bottom ash, boiler slag, or FGD waste.



**Upper  
Dam**



**Main  
(Lower)  
Dam**

Vectren  
 A.B. Brown Station  
 Ash Pond Dams  
 R. Simon 5-15-09  
 K. Laine 5-19-09

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Signature: F. Shane Bradford  
Name: F. SHANE BRADFORD  
Title: F.B. CULLEY PLANT DIRECTOR

This request has been reviewed and approved by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C., 3501-3520.

Please send your reply to:

Mr. Richard Kinch  
US Environmental Protection Agency (5306P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

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Response to Information Request  
Southern Indiana Gas and Electric Company – F. B. Culley Generating Station

The F. B. Culley Station has two ash management units.

1. The plant has two ash ponds identified as the East and West ponds. Both ponds were dug into the existing grade. They do not have defined dams and therefore do not have a dam hazard rating. The height of the pond edge is the natural height of the surrounding area.
2. The West pond was commissioned in the mid 1960's and the East pond was commissioned in 1973.
3. Liquid wastes that are sluiced into the ponds include fly ash, bottom ash, FGD belt filter wash down and water sump wastes, pyrites, coal pile run-off, plant floor drain wash downs, air pre-heater wash water, clarified river water line flush (river sediment), oily waste separator water overflow, boiler chemical cleaning wastes (once per 4-5 years), boiler seal trough discharges, and rainfall / storm water runoff from the plant.

During nine of the last ten years (1999-2008), ash has been excavated from the ponds. The ponds are generally cleaned on an alternating year cycle to a level which will allow for at least 1-2 years of new input. Due to an extensive cleaning cycle in recent years, we do not anticipate needing to clean either pond for another 3-4 years.

4. We are not aware of a PE certification for the safety of the management units. Both ponds are dug into the existing grade. The East pond has a construction design drawing but it is not stamped by a PE.
5. Neither pond has an identified dam so no dam inspections have been conducted. An outside engineering firm, ATC Associates (Indianapolis, IN), has been contracted to perform an inspection of the ponds the first week of April 2009. During the inspection by ATC, personnel at the plant will be instructed on how to perform a proper pond inspection and going forward, in-house inspections will be conducted once per quarter.
6. Neither pond has an identified dam so no State or Federal dam inspections have been conducted.
7. NA – There have not been any inspections.
8. The West pond has a surface area of 18 acres. In order to maintain water capacity necessary to prevent suspended solid issues that would affect our NPDES permit, the pond is limited to 1 million cubic yards of usable storage capacity. As of January 1, 2009 the West pond contained 588,000 cubic yards of material. The East pond has a surface

SIGECO- F. B Culley Station

area of 7 acres. The total storage capacity is estimated to be 600,000 cubic yards and the volume of material stored as of January 1, 2009 is 445,000 cubic yards.

9. No spills or unpermitted releases of ash from the pond have occurred with the last ten years.


Note: There are no additional ponds or settling basins on site. All water from the plant, including storm water, flows through one of the two ash ponds.



EPA believes that the information requested is essential to an evaluation of the threat of releases of pollutants or contaminants from these units. The provisions of Section 104 of CERCLA authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 104(e). In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. 1001.

Your response must include the following certification signed and dated by an authorized representative of Southern Indiana Gas & Electric Company.

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature:   
Name: RONALD G. JOCHUM  
Title: VP POWER SUPPLY

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