



July 18, 2018

Via E-Mail

Peter Goodman, Director
Kentucky Division of Water
300 Sower Boulevard, 3rd Floor
Frankfort, KY 40601

**RE: Agreed Order in Case No. DOW-17001
 Corrective Action Plan for E.W. Brown Generating Station
 Agency Interest ID No. 3148**

Dear Mr. Goodman:

Pursuant Paragraph 15.A and 16 of the above referenced Agreed Order, Kentucky Utilities Company (KU) is in the process of completing the Phase II field effort associated with the Corrective Action Plan. As part of that effort, KU submitted a description of the Phase II sampling program to the Energy and Environment Cabinet ("Cabinet") on May 2, 2018, as well as the Young of the Year (YOY) Quality Assurance Project Plan (QAPP) Addendum and the YOY Standard Operating Procedures (SOP) on May 10, 2018. The Phase II efforts were initiated on June 14, 2018, as agreed upon with the Cabinet during the course of discussions regarding the Cabinet's comments on the Phase II Plan, the YOY QAPP Addendum, and YOY SOP.

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As discussed with the Cabinet on June 20, 2018, the efforts to collect bass YOY as part of the Phase II sampling were unsuccessful due to atypical climate, rainfall, and lake levels during April, May, and June. We understand from communications with the Cabinet and with the Kentucky Department of Fish and Wildlife Resources that bass spawning was affected at multiple lakes throughout the state and this was not unique to Herrington Lake.

As we discussed on July 12, 2018, KU proposes an alternative YOY study to be performed on bluegill instead of bass. Bluegill are deemed an equally or more sensitive species with respect to selenium. Ramboll staff are in the field this week and conducted a preliminary assessment of bluegill as a possible alternative to bass for a YOY study. Based on field observation made on July 16 and 17, it appears that sufficient numbers of bluegill will be available to conduct a bluegill YOY study. As a result, we propose to deploy a team to conduct the study, starting sometime between July 21 to 23, depending on weather conditions and the progress of pore water sampling.

We believe the existing YOY QAPP Addendum and YOY SOP are adequate for bluegill sampling because the sampling and deformities evaluation techniques will be the same. If sufficient bluegill are collected (which can only be confirmed once full fishing equipment and staff are deployed), we will update the YOY QAPP Addendum and YOY SOP to change from bass to bluegill, as discussed during the July 12 call.



We would appreciate your written approval of this plan before July 21.

Yours sincerely,

A handwritten signature in black ink, appearing to read "M. Sorensen".

Mary Sorensen

Principal

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