

US EPA ARCHIVE DOCUMENT



May 27, 2011

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**Re: *KCP&L Greater Missouri Operations Company – Lake Road Generating Station
Draft Coal Ash Impoundment Site Assessment Report***

Dear Mr. Hoffman:

Thank you for the opportunity to provide comments on the Draft Coal Ash Impoundment Site Assessment Report for KCP&L Greater Missouri Operations Company's (KCP&L GMO) Lake Road Generating Station coal combustion byproduct impoundments. The assessment was completed by Kleinfelder on March 2, 2011.

KCP&L GMO has the following comments:

Comment 1

On the Title Page, Page 2, and Page 6; please change Kansas City Power & Light to KCP&L Greater Missouri Operations Company.

Explanation

This change reflects the proper ownership of the station. The legal name of the owner is KCP&L Greater Missouri Operations Company. Kansas City Power & Light Company is a separate company under a common holding company.

Comment 2

On the Page 12, please consider showing the "Total Volume of Pool" for the actual impoundments discussed.

Explanation

This would correctly show the specific impoundment volume discussed versus aggregating the pond volumes.

Comment 3

On Page 14 Section 3.3 first paragraph, please change "depending" to "deepening".

Explanation

Typo

Mr. Stephen Hoffman
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Page 2 of 2

Again, thank you for the chance to comment. If you have any questions please contact me at paul.ling@kcpl.com or phone 816-556-2899.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul M. Ling". The signature is stylized and cursive.

Paul M. Ling
Manager of Environmental Services
Kansas City Power & Light Company

NOTE

Subject: EPA Comments on Kansas City Power & Light Co, Lake Road Generating Station,
Clinton, MO
Round 9 Draft Assessment Report

To: File

Date: April 14, 2011

1. For ease of visual comprehension, please attach reference photographs in text to reference location.
2. Please include, as an appendix, all technical reports in which the analysis is referred to in the text, e.g. URS spillway and geotechnical analyses.
3. On p. 2, please include a statement that reconciles the fact that the company's survey response addresses two units "Settling Pond" and "Slag Settling Pond," and the assessment is conducted on four units: Coal Pile Run-off Pool (Northwest Ash Pool), Slag Settling Pool (Northeast Ash Pool), Interim Settling Basin (Southwest Settling Basin) and Final Settling Basin (Southeast Settling Basin). In addition, the following statement, presented on p. 9 should be presented when initially listing the impoundments assessed: "The CCB Ash Pond functions as one ash pond separated into four pools; therefore, Kleinfelder only considered the outer embankment of the CCB Ash Pond, disregarding the interior dike between the northeast and northwest pools and the filter dikes between the northern pools and southeast and southwest pools."
4. On p. 11, replace "4.2 Pertinent Data" with "3.2 Pertinent Data."
5. On p. 14, Section 3.4, it is stated that Kansas City Power and Light contractor (URS) noted in spillway analysis that the outlet works could not pass a design 25-year 24-hour event when combined with normal plant flows. The report continues to state that if pool elevations are maintained below 814.92 feet, the CCB pond could store the event. The report makes no mention of interim pool elevation monitoring in a storm event beyond the standard bi-weekly inspections. It may be necessary to develop a pool elevation monitoring program with more frequency than bi-weekly inspection in order to assure safe pool elevations. Also, add a space in between paragraph 1 and paragraph 2.
6. On p. 16, Section 3.5, last line in second paragraph, add "or" in between "reduce" and "mitigate" or delete either word.
7. On p. 21, Section 5.2, please be specific with identification of units inspected : "5.2 Summary Statement I acknowledge that the management unit(s) referenced herein was personally inspected by me and found to be in the following condition:"

8. On p. 22, Section 6.1, these definitions ought to be a footnote or included at the end of Section 6. Placement at the beginning of the section seems to bury the actual recommendations (Sections 6.2 and 6.3)
9. The following question was not addressed in report: “Is any part of the impoundment built over wet ash, slag, or other unsuitable materials (like TVA)?” Please include this and the response at the end of the field observation checklist.
10. On the last page of the report, the document provided is not the company's response letter to the EPA's Section 104(e) Request for Information (it is an access authorization letter). The response letter may be found at <http://www.epa.gov/epawaste/nonhaz/industrial/special/fossil/surveys/kcpl-lake-rd.pdf>
11. Appendix A Field Observation Checklist is one checklist for “Slag/Coal Pile Run-off Pond.” Four units were assessed, there should be a check list for each sheet, or each unit needs to be appropriately identified on the sheet.
12. Page 15 says compacted clay is used to line the pond, but the checklist says “N/A” under the liner category, please reconcile.