

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on Empire District Electric Co, Riverton Power Station,  
Riverton, KS Round 7 Draft Assessment Report

To: File

From: Jana Englander, OSWER, US EPA

Date: January 27, 2011

1. The report ought to have an executive summary toward the front. May consider moving the Section 12.5 Summary on p. 27 to the front of the report and rename it as an executive summary. The executive summary should also include the overall assessment rating provided by the contractor.
2. The following question was not addressed in the report, please address and answer in the final report: **Is any part of the impoundment built over wet ash, slag, or other unsuitable materials (like TVA)?**

State: None

Company: See attached letter dated March 2, 2011



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March 2, 2011

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

RE: DRAFT – Specific Site Assessment for Coal Combustion Waste Impoundments at Empire District Electric Company, Riverton Generating Station – Riverton, Kansas

Mr. Hoffman:

The Empire District Electric Company (Empire District) acknowledges receipt of the above document on February 4, 2011 and appreciates the opportunity to provide comment on the report. The scope of work performed by the GEI Consultants, Inc. (GEI), as a contractor to the U.S Environmental Protection Agency (EPA) for the site specific assessment was courteous and professional. The recommendations provided in the report will be helpful in the development of Empire District's plan to perform additional engineering studies to assure the safe storage of coal combustion waste at the Riverton Generating Station.

Comments on Assigned Ratings:

Empire District disagrees with the limited tiered assessment and subsequent "Poor" overall rating given to the Riverton Generating Station. The geotechnical work and engineering studies completed in 2010 on the impoundment proved valuable to Empire District in determining critical factors of safety for overall stability of the perimeter dikes. It is recognized that the study did not meet the specific template of the site inspection requirements, and that the lower rating was assigned primarily due to the absence of analytical information regarding interior ash stockpiles unavailable at the time of the site inspection.

Empire District also disagrees with the final "significant hazard potential" rating applied to the Riverton impoundment. The rating was universally assigned as a result of the wet storage classification and proximity to the Spring River.

Corrections and Additions to the Assessment Report:

On page 4, Section 2.2, Table 2-1 the West Cell is listed as having a surface area of 300 acres. As indicated in the report, Empire District had previously estimated the total surface area of the landfill impoundment at 28 acres. If the GEI estimate was intended to state 30 acres in size for the West Cell, the draft report should be corrected.

On page 4, Section 2.4 the explanative text should be corrected to indicate two 8-inch lines are used to sluice the ash. One is directed to the West Cell for bottom ash and one to the East Cell for the fly ash.

On page 5, Section 2.7 the explanative text does not include a reference to the bottom ash line in the stated operating procedures.

On page 22, Section 12.1 reference is made to the installment of a "trash rack." The piece of grating mentioned in the report is used only as a platform to safely collect samples. The landfill as permitted is an industrial monofill, used only for the disposal of fly ash and bottom ash. Debris and trash accumulation has never been a problem at the landfill. Empire District believes the installation of a trash rack to collect large debris from the coal combustion residuals is not necessary.

Thank you for making the draft report easily accessible for our review and comment. Please let me know if you have any questions or informational requests that I may assist you with.

Respectfully,

A handwritten signature in cursive script that reads "Kavan L. Stull".

Kavan L. Stull  
Environmental Coordinator, Energy Supply Services  
The Empire District Electric Company