

US EPA ARCHIVE DOCUMENT



May 27, 2011

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

**Re: *Kansas City Power & Light Company – Montrose 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 Kansas City Power & Light Company's (KCP&L) Montrose Generating Station coal combustion byproduct impoundments. The assessment was completed by Kleinfelder on March 1, 2011.

KCP&L has the following comments:

Comment 1

On Page 10, Section 2.2(A)(10), the "size" of "472,000" cubic feet could not be confirmed.

Explanation

It is not clear what the size is referring to (volume or area).

Comment 2

On Page 12, Section 3.4 states hydrologic, hydraulic, or dam break analysis were not provided.

Explanation

As stated in the preceding paragraph in Section 3.4, "the North and South Ash Ponds were constructed by excavating pits in the natural ground". The ponds were correctly identified on Page 10 as "incised" ponds. A dam breach analysis and associated hydrologic and hydraulic analysis are not necessary since there are no embankments to breach because the ponds are incised.

Comment 3

On Page 13, Section 3.5 states design documentation or slope stability analyses were not available.

Explanation

As stated in Section 3.4, "the North and South Ash Ponds were constructed by excavating pits in the natural ground". The ponds were correctly identified on Page 10 as "incised"

ponds. Slope stability analysis or associated design documentation are not necessary since there are no embankments to fail because the ponds are incised.

Comment 4

On Page 14, Section 3.6 states documentation under seismic loading was not available.

Explanation

As stated in Section 3.4, “the North and South Ash Ponds were constructed by excavating pits in the natural ground”. The ponds were correctly identified on Page 10 as “incised” ponds. Seismic analysis is not necessary since there are no embankments to fail because the ponds are incised.

Comment 5

On Page 18, Section 5.1 states “concerns” regarding the need for an Emergency Action Plan and site survey.

Explanation

As stated in Section 3.4, “the North and South Ash Ponds were constructed by excavating pits in the natural ground”. The ponds were correctly identified on Page 10 as “incised” ponds. An Emergency Action Plan and site survey would not appear necessary since there are no embankments to fail because the ponds are incised.

Comment 6

On Page 19, Section 5.2 rates the impoundments as “Fair”. The rating of the impoundments would more accurately be rated as Satisfactory.

Explanation

As stated in Section 3.4, “the North and South Ash Ponds were constructed by excavating pits in the natural ground”. The ponds were correctly identified on Page 10 as “incised” ponds.

The proposed rating appears to put too much emphasis on the potential for embankment failure of an incised pond that is not possible. The EPA checklist even states that the use of the checklist is optional for incised impoundments. History of the pond performance, the type of impounded material, and the temporary nature of material present indicate no potential for embankment problems. The suggested maintenance items are relatively minor and do not appear to affect the structural integrity of the ponds. A rating of Satisfactory more accurately reflects the regulatory definition, “No existing or potential impoundment safety deficiencies are recognized. Acceptable performance is expected (the term expected is to be defined as likely) under all applicable loading conditions (static, hydrologic and seismic) in accordance with the applicable criteria. Minor maintenance items may be required.”

Mr. Stephen Hoffman
May 27, 2011
Page 3 of 3

Comment 7

On Page 20 Section 6.1, Priority 1 recommendations overstate the impact of the items.

Explanation

Recommendation 1 requires an Emergency Action Plan. As described above, the ponds are incised with no embankments to fail. An Emergency Action Plan has been developed based on the draft recommendation.

Recommendation 2 overstates the value of the survey to the operation of the ponds. The ponds are incised. The survey can be completed but is not expected to add value to the safe operation of the ponds.

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', written in a cursive style.

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

NOTE

Subject: EPA Comments on Kansas City Power & Light Co, Montrose 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. On p. 9, replace “2.2 Pertinent Data” with “3.2 Pertinent Data.”
3. On p. 12, Section 3.3, Paragraph 2, Line 2: replace “Natrua” with “Natural.”
4. On p. 19, 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:"
5. On p. 20, 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)
6. On p. 20, Section 6.2, add a recommendation to include a hydraulic analysis which will yield the capacity of the ponds, outlet structures, and design freeboard in addition to other pertinent parameters.
7. 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.
8. 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-mont.pdf>
9. On p. 2, please include a statement that reconciles the fact that the company’s survey response addresses one unit “Ash Settling Pond” and the assessment is conducted on two units: North Ash Pond and South Ash Pond.