

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on Kansas City Power & Light Co, Sibley Generating Station,
Sibley, MO
Round 7 Draft Assessment Report

To: File
From: Jana Englander, OSWER, US EPA

Date: February 1, 2011

1. On p. 2, in the Introduction section, the report provides an assessment rating for the Fly Ash Pond, but not Slag Settling Pond. Both ponds should be included in this section. The following statement found on p. 11 should be placed in the Introduction section on p. 2: "A second pond was observed on site that was used for slag settling; since the pond was incised no dike assessment was required. (See Appendix C- Doc. 16)"
2. On p. 12, the report states that the "north dike" is evaluated as low hazard potential. Replace "north dike" with "fly ash pond."
3. On p. 15, the report identifies an expired NPDES. Please identify any activities for renewal.
4. On p. 18, section 5.3 is titled "EAST DIKE," the attached photo cites the "east dike," however, the discussion in section 5.3 refers to the "south dike." Which is it? Similarly on pp. 19 and 20, section 5.4 is titled "NORTH DIKE," but there is discussion here and in section 5.4.2 is on the "west dike."
5. On p. 23, section 5.6.2, "12 in" should be replaced with "12-in."
6. On p. 28, section 7.2 "ADEQUACY OF SUPPORTING TECHNICAL DOCUMENTATION" states that the "Structural stability documentation is marginal." There is no discussion supporting this claim. Please elaborate.
7. With no documentation supplied to Dewberry, one might view that sections 8.2 and 8.3 on p. 29 would be assessed as inadequate. The Section is titled for the adequacy of maintenance and methods of operation, though no specific comment is made to the adequacy.

State: None

Company: See attached letter dated March 3, 2011



March 3, 2011

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

**Re: KCP&L Greater Missouri Operations Company – Sibley Generating Station (Site 05)
Fly Ash Pond
Dam Assessment Report**

Dear Mr. Hoffman:

Thank you for the opportunity to provide comments on the draft Dam Assessment Report for KCP&L Greater Missouri Operations Company's (KCP&L GMO) Sibley Generating Station fly ash pond. The assessment was completed by Dewberry & Davis, LLC.

KCP&L GMO has the following comments:

Comment 1

On the Title Page, 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

Please change all page footers to reflect the proper owner name, 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 3

Please change references in Sections 1, 2, and 3 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 4

In Sections 1.1.6, reference is made to brush clearing and re-sodding. KCP&L GMO requests additional detail on the brush clearing and greater flexibility on the replacement erosion control.

Explanation

KCP&L GMO requests better clarification of what size brush is recommended for removal. KCP&L GMO also requests flexibility for other erosion control means other than only re-sodding.

Comment 5

In Sections 1.2.6, reference the removal of large trees and woody brush and replacement with grasses. KCP&L GMO would request additional detail on the tree and brush removal and greater flexibility on the replacement erosion control.

Explanation

KCP&L GMO requests better clarification of what size tree and brush is recommended for removal. KCP&L will also need to comply with other potential regulating agencies for approval to remove the trees. KCP&L GMO also requests flexibility for other erosion control means other than only replace with grasses.

Comment 6

In Section 2.1, the maximum height should be 18 feet and the current storage capacity should be 361,000 cubic yards (223.8 acre-feet).

Explanation

This change would bring the assessment in line with Appendix A, Document 3, which was previously reported to the EPA Information Request on ponds.

Comment 7

In Table 2.3, the units indicate cubic yards, but should be cubic feet. The Surface Area (acre) should be 15.0 if current is sought.

Explanation

This change would bring the assessment in line with Appendix A, Document 3, which was previously reported to the EPA Information Request on ponds.

Mr. Stephen Hoffman
March 3, 2011
Page 3 of 3

Comment 8

In Section 2.4.1, the perimeter would be 5250 feet not 520 feet.

Explanation

The perimeter should be the total in Table 2.4.1.

Comment 9

In Table 2.4.1, the height should be 18 feet.

Explanation

This change would bring the assessment in line with Appendix A, Document 3, which was previously reported to the EPA Information Request on ponds.

Comment 10

Appendix A does not seem to be complete as listed in the table of contents. Doc 02, 03, 04, 05, and 10 are missing. There is an unlisted water flow diagram as a second document and a map of the plant location as a third document. The drawing listed as Doc 08, Fly Ash Silo-As Built Drawing S103 is the Fly Ash Grading and Drainage Plan Drawing S103 dated August 11, 1992. Please consider reviewing and organizing the appendix documents.

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,



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