

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on Westar Energy, Lawrence Energy Center, Lawrence, KS
Round 7 Draft Assessment Report

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

Date: January 25, 2011

1. This facility clearly has four distinct units: Areas 1, 2, 3, and 4 (clearly cited as such in the survey response). The draft report uses an unending number of names for these units, making it unclear in some instances as to which unit is being addressed:

Area 1: Area 1, Clear Water Pond, North Dike;

Area 2: Area 2, South Dike, south storm water pond dike;

Area 3: Area 3, West Dike, South Dike; and

Area 4: Area 4, North Dike, Northwest Dike

Please ensure consistency when addressing each pond with one name only.

2. On p. 13, the report states that the team evaluated the western and north dikes as “significant hazard potential”. Does this pertain to Areas 1, 3 and 4? What classification is Area 2?

3. Appendix C – Dam Inspection Checklist Form only contains a form for one unit: Under unit name, the form states “Area 1,” Under unit I.D., the form states “combined.” One form should have been used for each unit, it would be helpful to have the information as distinct per unit.

4. The checklist needs to include information about liner (portions that are clay lined or in the process of being clay-lined, etc.

5. Remove the duplication from report: pp. 122-126 (borehole logs); pp. 127-140 (geotechnical data).

State:

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To: James Kohler/DC/USEPA/US@EPA
Cc: William Bider <wbider@kdheks.gov>, Dennis Degner <ddegner@kdheks.gov>, Sam Sunderraj <SSunderraj@kdheks.gov>
Date: 03/02/2011 03:17 PM
Subject: FW: Comment Request on Westar Lawrence Energy Center Draft Report

Jim,

Based on my familiarity with the Westar Energy, Lawrence Energy Center site and review of the report by Dewberry & Davis LLC (Dewberry) of the Coal Combustion Waste settling containment structures at this site, I am offering the following as my comments relating to the Dewberry report.

I concur with the assessment of the condition, with no evidence of deficiencies, and recommendations of the CCR management units at the Lawrence Energy Center.

Thank you for the opportunity to comment on the Dewberry draft report for the Lawrence Energy Center.

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Company: See attached letter dated March 4, 2011



March 4, 2011

Mr. Stephen Hoffman
U.S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Re: Westar Energy Comments Regarding Lawrence Energy Center Coal Combustion Waste
Impoundment Round 7- Dike Assessment Report (Site #007) November 2010
(Dewberry & Davis Contract Number: EP-09W001727)

Dear Mr. Hoffman,

On February 4, 2011, Westar Energy, Inc. (Westar) received from your office the Draft Combustion Waste Impoundment Round 7- Dike Assessment Report (Site #007) dated November 2010 for Westar's Lawrence Energy Center. Per your request, we are providing comments in response to the draft report written by Dewberry and Davis. Please find below, Westar's comments regarding the content of the report and an update of recent activity.

Westar Suggested Modification to Content

Westar Energy recommends the following two modifications to the Draft Assessment Report.

Proposed Modification 1

Section 8.2 Maintenance of the Impoundment Dike and Project Facilities

"Review of the status of each cell and planning for reconstruction by senior plant personnel on a weekly basis." Westar recommends removing the portion "and planning for reconstruction", as this is not an applicable statement for the weekly review.

Proposed Modification 2

Section 8.2 Maintenance of the Impoundment Dike and Project Facilities

In the text, "Maintaining a uniform cover of suitable species of grass on embankment slopes which shall be mowed at least twice a year", Westar recommends removing "which shall be mowed at least twice a year" as this is not the current practice.

Westar Actions in Response to the Site Inspection

Westar has performed the following work pursuant to the comments provided by Dewberry & Davis during the site inspection and exit interview.

- 1) In November 2010, the brush and vegetation were removed from around the overflow outfall structure creating open access to the outfall structure.
- 2) In December 2010, trees and woody vegetation were removed from all perimeter berms. An improved maintenance procedure is being developed to provide better control of woody vegetation.
- 3) We have begun development of improved maintenance and inspection procedures.

