

US EPA ARCHIVE DOCUMENT

Comments

EPA:

Cover page: city/state is incorrect

Can preliminary H&H analysis be used to determine whether a "Fair" rating is more appropriate? With all the work that Westar and Golder have put into improving the quality of these impoundments it is surprising that no H&H analysis has been completed, preliminary or otherwise.

State:

From: Gary Christensen <GChristensen@kdheks.gov>  
To: James Kohler/DC/USEPA/US@EPA  
Cc: William Bider <wbider@kdheks.gov>, Dennis Degner <ddegner@kdheks.gov>, Sam Sunderraj <SSunderraj@kdheks.gov>  
Date: 02/24/2011 12:55 PM  
Subject: FW: Comment Request on Westar Energy - Tecumseh Energy Center Draft Report

Mr. Kohler

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

According to the Kansas Department of Agriculture, Division of Water Resources, prior to 2002 a jurisdictional dam was defined as having the ability to impound 30 acre feet or greater volume at the top of the dam. Both structures assessed by AMEC at Tecumseh Energy Center impound less volume, were built before 2002 and thus fall below the above definition and do not require a permit as long as they have not been modified.

The assessment, in the AMEC report, that the AREA 1 pond and Area 2 pond containment structures were found in "Poor" condition is misleading. The report should explicitly and more directly reflect a lack of proper documentation as the reason for the assessment. Therefore, I recommend that the assessment of Poor condition be removed from the report.

Thank you for the opportunity to comment on this draft report. If you have any questions, please don't hesitate to reply or call.

Gary Christensen

Solid Waste Landfills/BWM/KDHE  
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Company: See attached letter dated February 18, 2011



February 18, 2011

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

Re: Westar Energy Comments Regarding Draft Report of Dam Safety Assessment of Coal Combustion  
Surface Impoundments Westar Energy, Tecumseh Energy Center  
(AMEC Project No. 3-2106-0183.0001)

Dear Mr. Hoffman,

On January 24, 2011, Westar Energy, Inc. (Westar) received from your office the Draft Coal Combustion Surface Impoundment – Specific Site Assessment Report dated November 2010 for Westar's Tecumseh Energy Center. Per your request, we are providing comments in response to the draft report written by AMEC. Please find below, Westar's comments regarding the content of the report.

Westar Suggested Modification to Content

**Report Cover Page**

Change location of Tecumseh Energy Center from "*Clinton, IA*" to "*Tecumseh, KS*".

**Section 1.4, paragraph 1**

The paragraph seems to indicate that the majority of fly ash is sluiced to the ash pond. Nearly all Tecumseh fly ash is sold or land-filled dry. A small amount is sluiced to the ponds. Westar proposes the following wording for Section 1.4, paragraph 1, sentence 4.

*Most of the fly ash generated at the site is sold or land-filled in dry form, a small amount is sluiced to Area 1 Ash pond.*

**Section 2.3.2**

The second sentence states that the Area 2 outfall discharges into "*Mill Creek*". It should read "*Tecumseh Creek*".

The final sentence references the discharge piping from the coal pile runoff pond. The high level overflow pipe is not valved. The other pond discharge pipe is valved and is normally closed.

**Sections 2.4, 3.5.2, and 4.2.3**

The piezometers were installed for the Golder berm stability study and were removed upon reconstruction of the berm. There are monitoring wells west of the Area 1 berms that have lockable well caps. The piezometers weren't registered with the KDHE.

**Section 3.5.1, page 15, Table 8**

All corrective actions to the Golder recommendations cited in the table were completed prior to the site inspection.

**Section 4.2.4, page 18**

Westar suggests the addition of the following sentence to the last paragraph of the referenced section.

*Due to the proximity of the berms to Tecumseh Creek, sound engineering practices for stream bank maintenance and erosion prevention should be considered when implementing the referenced guidelines.*

**Appendix A, Area 2 Checklist, Page 2**

Please change "Area 1 Pond contains decant from Area 1 Pond" to "Area 2 Pond contains decant from Area 1 Pond".

Westar appreciates the opportunity to comment on the draft report. If there are questions concerning this information, please feel free to contact me at 785-575-8142.

Sincerely,



Bill Eastman

Director, Environmental Services

Cc w/o enclosure: P. Wallen, Westar Energy, Tecumseh Energy Center  
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