Comments on Blue Valley Power Station Draft Report

EPA: None.

State: None.

Company: See letter dated March 17, 2011.

City of Independence

POWER & LIGHT DEPARTMENT
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March 17, 2011

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

Re: Draft Specific Site Assessment for Blue Valley Power Station Ash Ponds

Independence Power and Light (IPL) respectfully provides the following comments on the subject report prepared by Geotechnical Environmental and Water Resources Engineering (GEI Consultants, Inc.) dated December 2010.

1. Page 4, Section 2.1, Paragraph 1: The second to the last sentence of the paragraph should be revised to state that "All units are seasonal units that operate primarily during the summer months, but are available year round on an as needed basis."

2. Page 7, Section 2.7, Paragraph 2: The second and third sentences of the paragraph should be revised to state that "Excess water is decanted from the Bottom Ash Pond and discharged into the sanitary sewer for disposal." The correct flow is described later in the report (Section 4.4, Page 10).

3. Page 15, Section 7.1, Paragraph 1: The words "South Fly Ash Pond" should be replaced with "Bottom Ash Pond" in the first sentence.

4. Page 15, Section 7.2.1, Paragraph 1: The words "South Fly Ash Pond" should be replaced with "Bottom Ash Pond" in the first sentence.

5. Page 18, Section 8.3, Paragraph 1: The final sentence should be revised to state that "Excess water from the South Fly Ash Pond discharges to the Bottom Ash Pond."

6. Page 19, Section 8.3.3.5, Paragraph 2: The final sentence describing the water surface in the Bottom Ash Pond should be deleted or moved to Section 8.4 because Section 8.3 describes the South Fly Ash Pond.

7. Page 22, Section 10.1, Paragraph 1: The first sentence should be revised to state that "Blue Valley Power Plant produces power primarily during the summer months, but is available year round, and thus, is manned 24 hours a day, seven days a week."

8. Page 26, Section 12.6, Last Paragraph: The assessment date listed (November 8, 2010) should be verified. Our records indicate the site visit occurred November 4, 2010.

9. Figure 1, Site Location Diagram: "South Fly Ash Outlet to Sanitary Sewer" should be revised to "Bottom Ash Outlet to Sanitary Sewer".

10. Bottom Ash CCW Impoundment Inspection Form, page 4: The configuration listed for the Bottom Ash Pond (i.e., Diked) should be verified. Our observations indicate that a more appropriate configuration would be incised.

Sincerely,

E. Leon Daggett
Independence Power & Light Director

Enclosure:
Schedule
Groundwater Monitoring Program memorandum
Standard Operating Procedure memorandum

cc: Keith Connor, Burns & McDonnell
Ken Simmons, Burns & McDonnell
Patrick Peltz, MDNR
Allen Garner, City Counselor
Eric Holder, IPL
BMcD File 58628