City of Independence

POWER & LIGHT DEPARTMENT
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August 25, 2011

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

RE: CCR site assessment at Independence Power and Light Blue Valley Power Station

Dear Mr. Hoffman,

The City of Independence Power & Light (IPL) recently received the final report from the site assessment that was conducted on November 4, 2010, by GEI Consultants on the subject power station located at 21500 East Truman Road, Independence, Missouri. The final report outlines specific recommendations for seepage and stability analysis and installation of monitoring equipment on and around the embankments of the ash ponds. All three of the ash ponds received "Fair" assessment ratings as well as being classified as "Low" hazard structures according to Federal Guidelines for Dam Safety.

Independence Power and Light does not have qualified geotechnical staff to be able to assess the work that is to be performed, based upon the recommendations. Therefore, IPL is contracting with HDR, Inc., to develop the detailed analysis of work to be performed. This analysis will include a cost for performing the work and the time required to complete each of the report's recommendations. The expense of performing this work will be a significant budgetary line item for our municipality that must be approved by the city council. Therefore, it is crucial that this work be accurately evaluated and estimated so that it can be properly understood and approved.

Within 60 days, IPL will provide a specific plan and schedule for implementing each of the recommendations from the GEI report.

If there are any questions, please call 816-325-6286 or email jbuehre@indepmo.org.

Sincerely,

E. Leon Daggett

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Power and Light Director

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October 27, 2011

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

RE: Coal Combustion Residual (CCR) site assessment at Independence Power and Light Blue Valley Power Station Schedule for completion

Dear Mr. Hoffman,

On August 25, 2011, the City of Independence Power & Light (IPL) submitted a response to the request for performing further assessment of our CCR storage ponds. As stated in that response, IPL is submitting this schedule and scope of work for completion of the recommendations that were made by EPA's Contractor GEI Consultants for the three low hazard ponds at our Blue Valley Power Station.

IPL contracted with HDR, Inc., to develop a geotechnical analysis of GEI Consultants Report and develop a scope of work that needs to be performed. HDR analysis included a cost for performing the work and the time required to complete each of the report's recommendations. Funding to complete this scope of work is not included in the current fiscal year budget (July 1, 2011 – June 30, 2012) and a request for funding next fiscal year will be presented to the City Council for approval. The requested funds would not be available for expense until July 1, 2012.

The minimum length of time required to perform the field assessments and generate reports after council approval, according to HDR, is 4-four months. Therefore, IPL will have the attached scope of work completed and reported to the EPA during the first quarter of calendar year 2013. IPL will notify EPA should there be a delay in the bid / approval process or in the execution of the work (inclement weather, etc.). However, to begin the assessment process, a topographic survey of the ash ponds, with a minimum of two foot intervals, will be performed during the current fiscal year.

If there are any questions, please call 816-325-6286 or email jbuehre@indepmo.org.

Sincerely,

E. Leon Daggett
Power and Light Director

Attachments

# Technical Scope of Services to be performed

**Geotechnical Investigation and Analyses**

- Geotechnical firm will perform field investigation services
- Previous subsurface exploration and geotechnical reports and information will be compiled
- Incorporate the CAD survey information and CAD drawings of the site, including cross sections in the report.
- Borings and cone penetrometer will be utilized to define subsurface conditions within the existing impoundment embankments (dikes).
    - Boring spacing and depths will be based on EM 1110-2-1913, Design and Construction of Levees, USACE and the recommendations of the geotechnical firm.
    - Six of the borings will be converted to piezometers.
- Soil from borings will be analyzed to better refine physical properties relative to slope stability and seepage evaluations.
- All boring and testing locations will be surveyed and included on the existing map of the ash ponds.
- Complete the analyses based on information obtained during the investigation, including:
    - Slope stability evaluation of the existing impoundment berm embankments (dikes) and recommendations.
    - Underseepage evaluation for the existing impoundment berm embankments (dikes) and monitoring recommendations.
- Provide a report that describes the assessment and findings of the geotechnical investigation, slope stability and underseepage as well as recommendations. This will be prepared and signed by a professional engineer.
- Prepare a cover summary to provide the USEPA with slope stability and seepage analyses results and any recommendations associated with monitoring for those items.
- Provide geotechnical engineering report calculations, analysis, data and other information as appropriate to complete slope stability and underseepage analyses.

**Operations Plan**

Prepare an Operations Plan that addresses the recommendations provided in the above geotechnical report.

- Based upon recommendations from the geotechnical report. The plan will also address any additional temporary or permanent instrumentation required to be installed.

The plan will be utilized as guidance for continual monitoring and maintenance of the embankments (dikes).