February 9, 2012

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

Re: KCP&L Greater Missouri Operations Lake Road Generating Station Coal Combustion Residual Site Assessment

Dear Mr. Hoffman:

This letter is in response to your letter of January 12, 2012, forwarding EPA's final report for the impoundment inspection of the KCP&L Greater Missouri Operations (KCP&L GMO) Lake Road Generating Station impoundments.

KCP&L GMO has reviewed and will implement EPA's recommendations. KCP&L GMO addresses below each of the recommendations found in the final report providing specific plans and schedules for implementing.

6.1 Priority 1 Recommendations
None

6.2 Priority 2 Recommendations

Repair erosion of landside embankment west of Interim Settling Basin.
Areas where erosion and slope steepening have occurred should be filled in and re-dressed with appropriate fill to prevent erosion from cutting further into the embankments.

KCP&L GMO Response:

The areas of erosion and slope steepening will be filled in and re-dressed with appropriate fill in 2012 to prevent erosion from cutting further into the embankments.

Perform an internal video inspection of the outlet conduit a minimum of once every 5 years. Evaluate the presence of cracks, displacement, or general deterioration of the outlet conduit that could potentially impair functionality of the outlet.

KCP&L GMO Response:

An internal video inspection to evaluate the presence of cracks, displacement, or general deterioration of the outlet conduit that could potentially impair functionality of the outlet conduit will be completed in 2012 and once every 5 years thereafter. The video inspection requirement has been added to Coal Combustion Product Storage Ponds Operation and Maintenance Plan.

Update O&M Manual to provide maximum dredging elevation. As noted in Section 1.2, the ash pond is located within the LCA for the Missouri River levee system. As such, dredging

operations should be limited to a maximum elevation equal to the original design bottom of pond elevation. If the pond is dredged to greater depths, USACE review and approval would be required.

KCP&L GMO Response:

The dredging operations will be limited to a maximum elevation equal to the original design bottom of pond elevation. This dredging limit requirement has been added to the Coal Combustion Product Storage Ponds Operation and Maintenance Plan. If the pond is dredged to greater depths, USACE review and approval will be received.

Periodic updates to O&M and EAP Manuals. It is recommended that O&M and EAP manuals be revised to include provisions requiring yearly review of documents and updating, as appropriate, with current emergency contact information and up-to-date procedures.

KCP&L GMO Response:

The Coal Combustion Product Storage Ponds Operation and Maintenance Plan and Emergency Response Action Plan have been revised to include a provision requiring yearly review of the documents and updating, as appropriate, with current emergency contact information and up-to-date procedures.

Develop an Interim Pool Elevation Monitoring Program during storm events. As stated in Section 3.4, the pond could not pass the flow of a 25-year, 24-hour rainfall event combined with the average or maximum daily plant flows; however, the CCB Ash Pond could store the flow if water levels in the pond are at or below elevation 814.92 feet. A more frequent monitoring program should be developed when the water level is at or above 814 feet to assure safe pool elevations.

KCP&L GMO Response:

More frequent monitoring requirements have been added to the Coal Combustion Product Storage Ponds Operation and Maintenance Plan when the water level is at or above 814 feet to assure safe pool elevations.

If you need any further information, let me know. I can also be contacted by phone at 816-556-2899 or e-mail at paul.ling@kcpl.com .

Sincerely,

Paul M. Ling
Manager of Environmental Services
KCP&L