February 9, 2012

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

Re: Kansas City Power & Light Company – Montrose 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 Kansas City Power & Light Company (KCP&L) Montrose Generating Station impoundments.

KCP&L has reviewed and will implement EPA's recommendations. KCP&L 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

Prepare an Emergency Action Plan (EAP) for the facility. An EAP should be prepared for the North and South Ash Ponds, as well as any other pertinent features related to the impoundments. If weekly visual inspection indicates an uncontrolled release is imminent, a list of procedures and contacts should be available to KCP&L personnel to help mitigate damages.

KCP&L Response:

An Emergency Action Plan has been prepared for North and South Ash Ponds, as well as any other pertinent features related to the impoundments, which includes a list of procedures and contacts.

Repair erosion on impoundment slope and drainage ditch. Areas where erosion has occurred should be filled in and re-dressed with appropriate fill to prevent erosion from cutting further into the impoundment slopes. Areas of concern include:

- South Ash Pond inlet where higher velocity flows have eroded the impoundment slope and caused minor caving.
- Drainage ditch slope near the southern culvert shows some erosion, which likely caused the adjacent chain-link fence to fall over.

KCP&L Response:

The South Ash Pond inlet erosion will be filled in and re-dressed with appropriate fill in 2012 to prevent erosion from cutting further into the impoundment slopes.

The drainage ditch erosion has been filled in and re-dressed with appropriate fill to prevent erosion from cutting further into the impoundment slopes. The adjacent chain-link fence will be repaired in 2012.

Perform vegetation mitigation around impoundment structures and incised slopes. Refer to Federal Emergency Management Agency's (FEMA) Manual 534, "Impact of Plants on Earthen Impoundments" for guidance on vegetation removal. This manual is available on the FEMA website.

KCP&L Response:

In accordance with FEMA's Manual 534, KCP&L performed vegetation mitigation around impoundment structures and incised slopes.

Perform an elevation survey. This survey should be performed to establish the embankment and pipe invert elevations. The survey datum should use the current standard which is North American Vertical Datum of 1988 (NAVD88). The survey data should be used to ensure adequate embankment height and hydrology of the ash pond facilities. The survey data will also assist with future maintenance, repair, and monitoring, as well as facilitate future inspection.

KCP&L Response:

KCP&L will perform an elevation survey in 2012. This survey should be performed to establish the embankment and pipe invert elevations. The survey datum will use the current standard which is North American Vertical Datum of 1988 (NAVD88). The survey data will be used to ensure adequate embankment height and hydrology of the ash pond facilities.

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