August 22, 2011

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

RE: KCP&L GMO Sibley Generating Station – Coal Combustion Residual Site Assessment

Dear Mr. Hoffman:

This letter is in response to your letter of July 26, 2011, forwarding EPA's final report for the impoundment inspection of the KCP&L Greater Missouri Operations Company (KCP&L GMO) Sibley Generating Station ash settling pond.

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.

1.2.1 Recommendations Regarding the Structural Stability
Recommend performing a stability analysis for seismic loading applied to the steady state loading and a static analysis under rapid draw down condition.

KCP&L GMO Response:

A Request for Proposal (RFP) is being developed for issuance in August 2011. This RFP will be used to select a geotechnical engineering firm to complete the requested stability analysis. It is anticipated that the stability analysis will be finalized by January 2012.

1.2.2 Recommendations Regarding the Maintenance and Methods of Operation
The following recommendations may help maintain safe and trouble-free operation:

- Monitor encroachment of vegetation.
- Employ a Geotechnical Engineer to develop a program to safely remove large trees and woody brush and replace with grasses.
- Dewberry recommends that an operations and maintenance (O&M) procedures document be created that includes a Record of Maintenance.

KCP&L GMO Response:

Monitoring the encroachment of harmful vegetation is now included in the weekly inspections of the ash settling pond embankments. This recommendation has been implemented.

A Request for Proposal (RFP) is being developed for issuance in August 2011. This RFP will be used to select a geotechnical engineering firm to develop the requested program to safely remove the large trees and woody brush. Once the study is completed, engineering plans and specification will be developed for issuance to a contractor to implement the on-site program. It is anticipated that required on-site program will be completed in Spring to Summer 2012 depending on whether conditions.

The ash settling pond operations and maintenance plan has been revised to include a requirement to maintain a maintenance record. This recommendation has been implemented.

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
KCP&L Environmental Manager