Westar Energy

VIA E-Mail

August 19, 2011

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

Re: Westar Energy, Lawrence Energy Center
Reply to Final Coal Combustion Waste Impoundment
Round 7 – Dike Assessment Report

Dear Mr. Hoffman,

On July 26, 2011, Westar Energy, Inc. (Westar) received from your office the Final Coal Combustion Waste Impoundment Round 7- Dike Assessment Report for our Lawrence Energy Center. Per you request, Westar is providing this response to address the recommendations in the report. Westar agrees that the report recommendations are of the highest priority and in general will act to address each item as quickly and fully as possible. Specific comments and best estimate of schedule for each item follows.

1.2 Recommendations

1.2.1 Recommendations Regarding the Field Observations
The large trees along the lower section of the western embankment should be removed. A vegetation control program should be instituted to control the type, amount, and height of vegetation on the outer embankment slopes. Implementation of this recommendation will prevent the creation of potential seepage paths in the embankment and allow for easier inspection of the outer slopes and toes of the embankment.

Response (1.2.1)
In December 2010, trees and woody vegetation were removed from all perimeter embankments. A formalized embankment inspection and vegetation control program has been established. Inspections are being performed at least monthly and if necessary, Work Orders are generated to address any vegetation problems including the removal of any new woody vegetation.

1.2.2 Recommendations Regarding the Maintenance and Methods of Operation
These recommendations should improve the safety and operation of the dike system:

- Continually repair animal burrows
- Implement the recommendation above in Section 1.2.1

Response (1.2.2)
Based on the report recommendations Westar has modified our embankment inspection program to include repair of identified animal burrows as well as all recommended Section 1.2.1 items.

1.2.3 Recommendations Regarding the Surveillance and Monitoring Program
A written program should be developed to detail a regular scheduled inspection of the dikes.

Response (1.2.3)
The performance of at least monthly inspections has been established and set-up in the plant computerized work management system. If necessary, Work Orders are generated to address items identified during inspections.

If there are questions concerning this response information please contact me at (785) 575-8121.

Sincerely,

Craig Swartzendruber

Craig Swartzendruber
Manager Environmental Compliance
Westar Energy