

History of Construction Report

Lower AQC Impoundment La Cygne Generating Station

Kansas City Power & Light Company

October 6, 2016

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1 INTRODUCTION

1.1. Purpose

On behalf of Kansas City Power & Light Company (KCP&L), AECOM has prepared the following history of construction for the Lower Air Quality Control (AQC) Impoundment (formerly known as the "Lower Air Quality Control pond") at the La Cygne Generating Station in accordance with 40 C.F.R. § 257.73(c).

1.2. Background

40 C.F.R. § 257.73(c)(1) requires the owner or operator of an existing coal combustion residual (CCR) surface impoundment that exceeds a specified size threshold to compile a history of construction that contains, to the extent feasible, the information specified in § 257.73(c)(1)(i)–(xii). Specifically, by October 17, 2016, a history of construction is required for each existing CCR surface impoundment that either (i) has a height of five feet or more and a storage volume of 20 acre-feet or more, or (ii) has a height of 20 feet or more (40 C.F.R. § 257.73(c)).

2 HISTORY OF CONSTRUCTION

§257.73 (c)(1)(i): The name and address of the person(s) owning or operating the CCR unit; the name associated with the CCR unit; and the identification number of the CCR unit if one has been assigned by the state.

Operator:	Kansas City Power & Light Company
• • • • • • • • • • •	

- Address: 25166 East 2200th Rd. La Cygne, KS 66040
- CCR Unit: Lower AQC Impoundment

The above named CCR unit does not have a state assigned identification number.

§257.73 (c)(1)(ii): The location of the CCR unit identified on the most recent U.S. Geological Survey (USGS) $7\frac{1}{2}$ minute or 15 minute topographic quadrangle map, or a topographic map of equivalent scale if a USGS map is not available.

See Attachment A – Boicourt Quadrangle, Kansas 7.5-Minute Series.

§257.73 (c)(1)(iii): A statement of the purpose for which the CCR unit is being used.

The Lower AQC Impoundment is primarily used as a holding basin for formerly sluiced CCR water and materials from the La Cygne Generating Station; AQC recycling water; gypsum runoff pond discharge; and stormwater management. The watershed for the Lower AQC Impoundment includes the on-site CCR landfill and overflow from the Upper AQC Impoundment, as well as other areas.

§257.73 (c)(1)(iv): The name and size in acres of the watershed within which the CCR unit is located.

The Lower AQC Impoundment is located in the Lower Marais Des Cygnes Watershed with a drainage area of 1,029,100 acres per United States Geological Survey¹ (USGS).

\$257.73 (c)(1)(v): A description of the physical and engineering properties of the foundation and abutment materials on which the CCR unit is constructed.

The available drawings and geotechnical data show that the foundation materials typically consist, from the top downward, of residual soils over primarily shale bedrock. Thin stringers of limestone and sandstone are present at some of the boring locations.

The Ebasco Services Incorporated As-Built Drawing² show that the embankment was not constructed around the entire perimeter of the impoundment. The embankment was constructed around portions of the perimeter where the ground surface elevation was less than 864 ft. The embankments abut into natural ground at the locations shown on the drawings. Details of the abutment materials were not described or referenced in the drawings. It is expected and assumed that the abutment materials are native materials similar to the foundation materials.

An available summary of engineering properties of the foundation and abutment materials for the Lower AQC Impoundment from the Geotechnical Report³ is presented in **Table 1**.

	Unit Weight (pcf)	Effective (drained) Shear Strength Parameters		Total (undrained) Shear Strength Parameters	
Material		Cohesion, c' (psf)	Friction Angle, Φ' (deg)	Cohesion, c (psf)	Friction Angle, Φ (deg)
Residual Soil	126	150	25	500	15
Weathered Shale	130	150	25	500	15
Bedrock	140	5,000	35	5,000	35

Table 1. Summary of Foundation Material Engineering Properties from Geotechnical Report³

§257.73 (c)(1)(vi): A statement of the type, size, range, and physical and engineering properties of the materials used in constructing each zone or stage of the CCR unit; the method of site preparation and construction of each zone of the CCR unit; and the approximate dates of construction of each successive stage of construction of the CCR unit.

Ebasco Drawings show that the La Cygne Generating Station's Lower AQC Impoundment (referred to as 'Ash Impoundment' in the drawings) is formed by an approximately 10,500 ft long embankment. The embankment is a homogenous, earth fill structure and is not zoned. Information on the method of site preparation is not reasonably or readily available. The geotechnical investigation by AECOM in 2010 determined the materials composing the embankment were primarily stiff, high plastic clay with minor rock fragments that was well-compacted⁹. Ebasco Drawing G-693⁴ notes the following regarding the method of embankment construction:

Fill material in this dike shall be compacted to 95% of standard proctor density. The moisture content of the backfill shall be within the limits of the optimum moisture required to obtain the percent compaction requirement. Additional requirements for the fill are noted in paragraph D9 of the grading and drainage specifications for Contract LA C1. Density tests of the compacted fill shall be performed for every 30,000 square feet per 6-inch lift with a minimum of one test per day for the dike section adjacent to the discharge canal. The fill material for the north dike section from centerline coordinates East 3,105,832 and North 638,100 to the east will be tested once for every 100,000 square feet per life with a minimum of one test per day.

An available summary of the physical and engineering properties of the construction materials for the Lower AQC Impoundment from the Geotechnical Report³ is presented in **Tables 2 and 3** below.

Material	Unit Weight	Effective (drained) Shear Strength Parameters		Total (undrained) Shear Strength Parameters	
	(pcf)	c' (psf)	Φ' (°)	c (psf)	Φ (°)
Embankment Fill	129	200	23	432	15

Table 2. Summary of Embankment Material Engineering Propertiesfrom Geotechnical Report³

Test		Min	Мах	Average
Water Content (%)		23	29	26
	Liquid Limit	N/A	N/A	61
Atterberg Limits*	Plastic Limit	N/A	N/A	15
	Plasticity Index	N/A	N/A	46

Table 3. Summary of Embankment Material Physical Propertiesfrom Geotechnical Report³

* Only one Atterberg Limit test result was available.

Available information indicates that the impoundment was constructed between 1971 and October 1973.

§257.73 (c)(1)(vii): At a scale that details engineering structures and appurtenances relevant to the design, construction, operation, and maintenance of the CCR unit, detailed dimensional drawings of the CCR unit, including a plan view and cross sections of the length and width of the CCR unit, showing all zones, foundation improvements, drainage provisions, spillways, diversion ditches, outlets, instrument locations, and slope protection, in addition to the normal operating pool surface elevation and maximum pool surface elevation following peak discharge from the inflow design flood, the expected maximum depth of CCR within the CCR surface impoundment, and any identifiable natural or manmade features that could adversely affect operation of the CCR unit due to malfunction or mis-operation.

Drawings that contain items pertaining to the requested information for the Lower AQC Impoundment are listed in **Table 4**. Items marked as "Not Found" are items not found in available record documentation. The available construction plans for the Lower AQC Impoundment are included in Attachment B.

Dimensional plan view (all zones)	Ebasco Services Incorporated Drawing No. AN8980 G-693 4 and G-162 2 (1971 and 1973)
Dimensional cross sections	Ebasco Services Incorporated Drawing No. AN8980 G-693 ⁴ and G-694 ⁵ (1971)
Foundation Improvements	Not Found
Drainage Provisions	Ebasco Services Incorporated Drawing No. AN8980 G-693 ⁴ (1971)
Spillways	Ebasco Services Incorporated Drawing No. AN8980 $G-693^4$, 1718 $G-582^6$, and AN8980 $G-162^2$ (1971, 1971, and 1973)
Diversion Ditches	Ebasco Services Incorporated Drawing No. AN8980 G-693 ⁴ (1971)
Outlets	Ebasco Services Incorporated Drawing No. AN8980 G-693 ⁴ (1971)

Table 4. Reference Drawings with Design Information Requested in § 257.73(c)(1)(vii)

Instrument Locations	Figure 1: Existing Instrumentation Locations – Lower AQC Impoundment (AECOM, 2016)
Slope Protection	None Included in Original Design
Normal Operating Pool Elevation	Ebasco Services Incorporated Drawing No. 1718 G-582 ⁶ (1971)
Maximum Pool Elevation	Ebasco Services Incorporated Drawing No. 1718 G-582 ⁶ (1971)
Expected Maximum Depth of CCR	Ebasco Services Incorporated Drawing No. AN8980 G-693 ⁴ (1971)
Identifiable Natural or Manmade Features That Could Adversely Affect Operation of the Lower AQC Impoundment	Woodward-Clyde Consultants Sheet 6 ⁷ and 8 ⁸ (1979)

All reference drawings listed in **Table 4** are included in **Attachment B**. (Figure 1 is located before **Attachment A**.)

Erosion control for the downstream slopes is provided by topsoil and vegetation. Inspections by AECOM show that these measures are effectively protecting the slope.

§257.73 (c)(1)(viii): A description of the type, purpose, and location of existing instrumentation.

The Lower AQC Impoundment has three piezometers that were installed on the dam crest in 2010 as part of a geotechnical investigation conducted by URS Corporation⁹. A water level gauge has been installed in the southwest corner of the impoundment. The three piezometers and the water level gauge are monitored no less than every 30 days to provide data on water levels within the embankment (piezometers) and water levels within the impoundment (water level gauge). The locations of these instruments are shown in Figure 1.

(§257.73 (c)(1)(ix): Area-capacity curves for the CCR unit.

An Area-capacity curve is shown on Drawing G-693⁴ (see **Attachment B**).

(\$257.73 (c)(1)(x): A description of each spillway and diversion design features and capacities and calculations used in their determination.

Drawing G-693⁴ shows two spillways. The spillway near the southwest corner of the impoundment is not given a title (e.g. principal spillway). The drawings show inlet consisting of a pipe (diameter not noted) along the upstream slope of the embankment. The inlet elevation of the pipe is shown at 858.0 ft. The pipe is shown to discharge into a box structure located at the toe of the upstream slope. Two, 48-inch diameter reinforced concrete pipes exit the box and flow into a discharge box located within the discharge canal (toe of the downstream slope) west of the impoundment. Field observations and a bathymetric survey by AECOM found no evidence of the existence of this structure. The other feature is labeled "Overflow from Runoff." The plans show that this feature is present along the embankment crest and

consists of a 120 ft. long depressed section with an elevation of 861 ft. The sides of the depressed section slope at 3H:1V a length of 15 ft. up to the top of embankment elevation (864 ft.).

Ebasco Sheet G-582⁶ shows a weir structure designed for the 100-year flood condition (210 cfs) centered along the 120 ft. long depressed section designed for a maximum probable flood of 1,303 cfs.

The calculations used in the determination of the capacities of the spillways are not reasonably or readily available. A pump system for water recirculation to and from the plant exists in the southwest corner of the impoundment. The As-Built (Drawing G162²) shows a pump station, "Pump A", "Pump B", and "Centerline Suct & Disch CLE WTP".

§257.73 (c)(1)(xi): The construction specifications and provisions for surveillance, maintenance, and repair of the CCR unit.

Other than the construction drawings included in Attachment B, construction specifications are not reasonably or readily available. Provisions for surveillance include the piezometers and water level gauge indicated in **Figure 1**.

KCP&L provisions for surveillance, maintenance, and repair of Lower AQC Impoundment in compliance with the USEPA CCR Rule include the following:

- La Cygne Generating Station accomplishes 7-day and 30-day inspections on the Lower AQC Impoundment in compliance with the CCR Rule¹⁰.
- La Cygne Generating Station supervisory staff reviews inspection documentation.
- In the event further evaluation is needed, station management and/or corporate staff will be consulted as appropriate.
- Follow-on work is scheduled to repair issues determined to be in need of remediation.

§257.73 (c)(1)(xii): Any record or knowledge of structural instability of the CCR unit.

No signs of structural instability have been reported.

3 LIMITATIONS

The signature of AECOM's authorized representative on this document represents that to the best of AECOM's knowledge, information and belief in the exercise of its professional judgment, it is AECOM's professional opinion that the aforementioned information is accurate as of the date of such signature. Any recommendation, opinion or decisions by AECOM are made on the basis of AECOM's experience, qualifications and professional judgment and are not to be construed as warranties or guarantees. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data and that actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

4 ENGINEER'S CERTIFICATION

This document was prepared under the direct personal supervision of Brian D. Linnan, a Registered Professional Engineer in good standing in the State of Kansas. I certify, the History of Construction for the La Cygne Lower AQC Impoundment, dated October 6, 2016, which includes all pages in Sections 1 and 2, meets the requirements of 40 CFR § 257.82.

Brian D. Linnan

Printed Name

October 6, 2016

Date

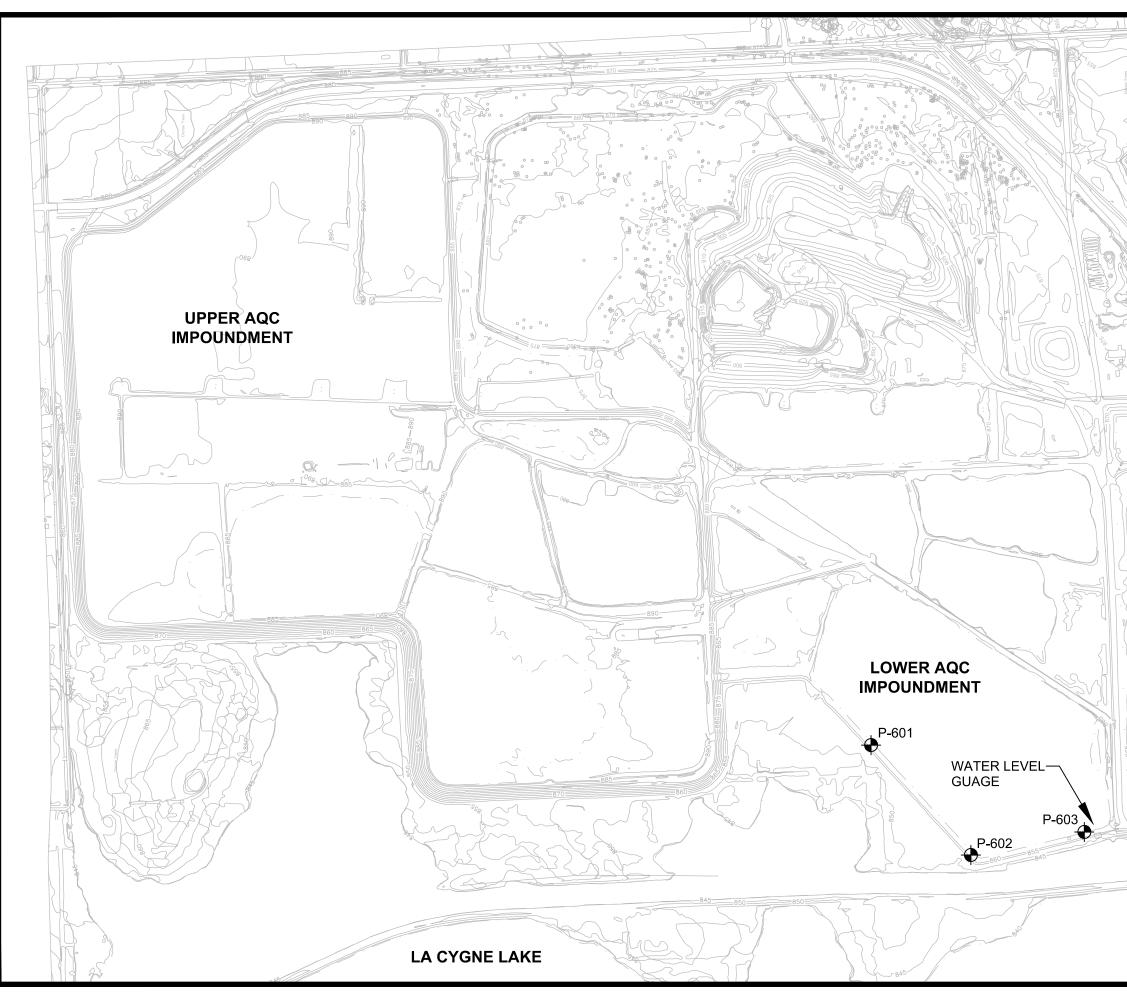


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5 REFERENCES

- 1. United States Geological Survey (USGS), The National Map Viewer. http://viewer.nationalmap.gov/viewer/. USGS data first accessed in April of 2016.
- Ebasco Services Incorporated, Kansas City Power & Light Company, Kansas Gas & Electric Company La Cygne Steam Electric Station 1973, 848 MW (Net) Installation, Unit No. 1 Plot Plan – As-Built Construction (Drawing No AN8980 G-162), October 2, 1973.
- 3. AECOM, Geotechnical Report, Kansas City Power & Light Company, Lower AQC Impoundment, La Cygne Generating Station, October 2016.
- 4. Ebasco Services Incorporated, Kansas City Power & Light Company, Kansas Gas & Electric Company La Cygne Steam Electric Station 1973 848 MW (Net) Installation Unit No. 1 Ash Pond Dike Plan & Sect (Drawing No AN8980 G-693), March 22, 1971.
- 5. Ebasco Services Incorporated, Kansas City Power & Light Company, Kansas Gas & Electric Company La Cygne Steam Electric Station 1973 848 MW (Net) Installation Ash Pond Dike Dets MAS & REINF (Drawing No AN8980 G-694), March 19, 1971.
- 6. Ebasco Services Incorporated, Kansas City Power & Light Company, La Cygne Station Air Quality Control - AQC Structural - Miscellaneous Ash Pond Weir Structure M&R Diagram (Drawing No 1718 G-582), December 28, 1971.
- 7. Woodward-Clyde Consultants Kansas City, Kansas City Power & Light Company, Kansas Gas & Electric Company La Cygne Steam Electric Station New F.G.D. Sludge Retention Dam Stage 1 Dam Foundation Grade and Excavation Plan (Sheet 6), January 30, 1979.
- 8. Woodward-Clyde Consultants Kansas City, Kansas City Power & Light Company, Kansas Gas & Electric Company La Cygne Steam Electric Station New F.G.D. Sludge Retention Dam Stage 1 Dam and Spillways Plan (Sheet 8), January 30, 1979.
- 9. URS Corporation, Geotechnical Evaluation: AQC Ponds Kansas City Power & Light La Cygne Generating Station, September, 2010.
- 10 KCP&L, Coal Combustion Residuals (CCR) Inspection Program, La Cygne Generating Station, Rev. 3, August 2016.

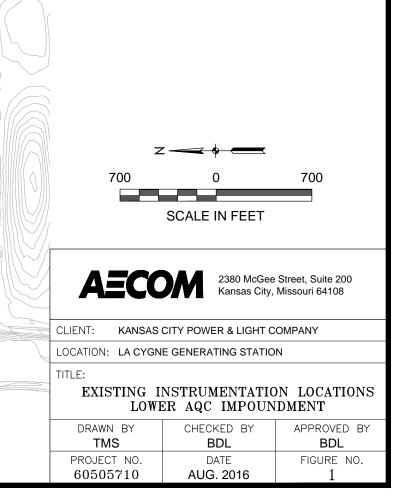
Figure 1 Existing Instrument Locations – Lower AQC Impoundment





P-601 PIEZOMETER LOCATION AND NUMBER

SOURCE: EXISTING TOPOGRAPHY WAS PRODUCED FROM AERIAL MAPPING PROVIDED BY M. J. HARDEN ASSOCIATES INC., DATED 2001.

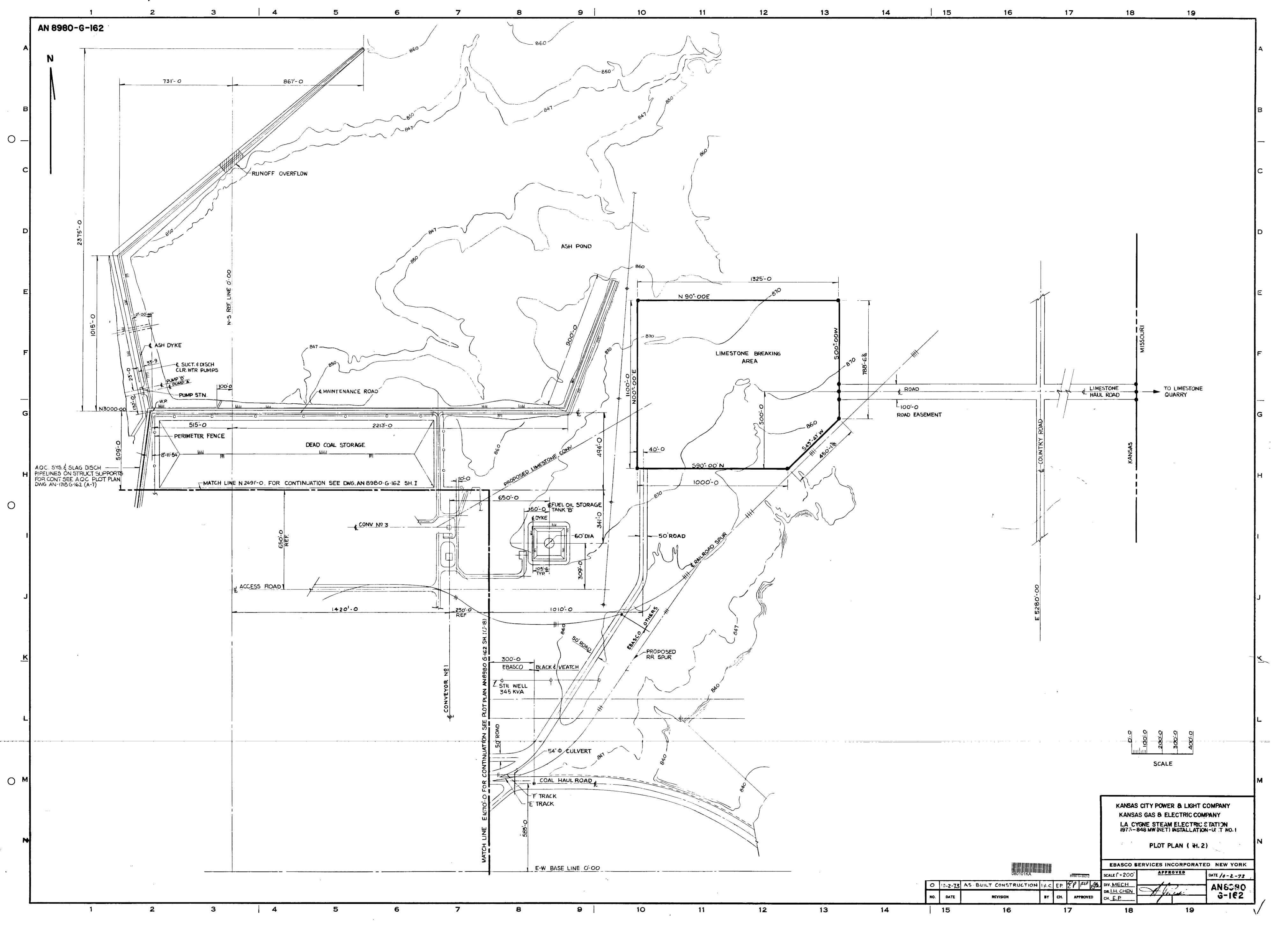


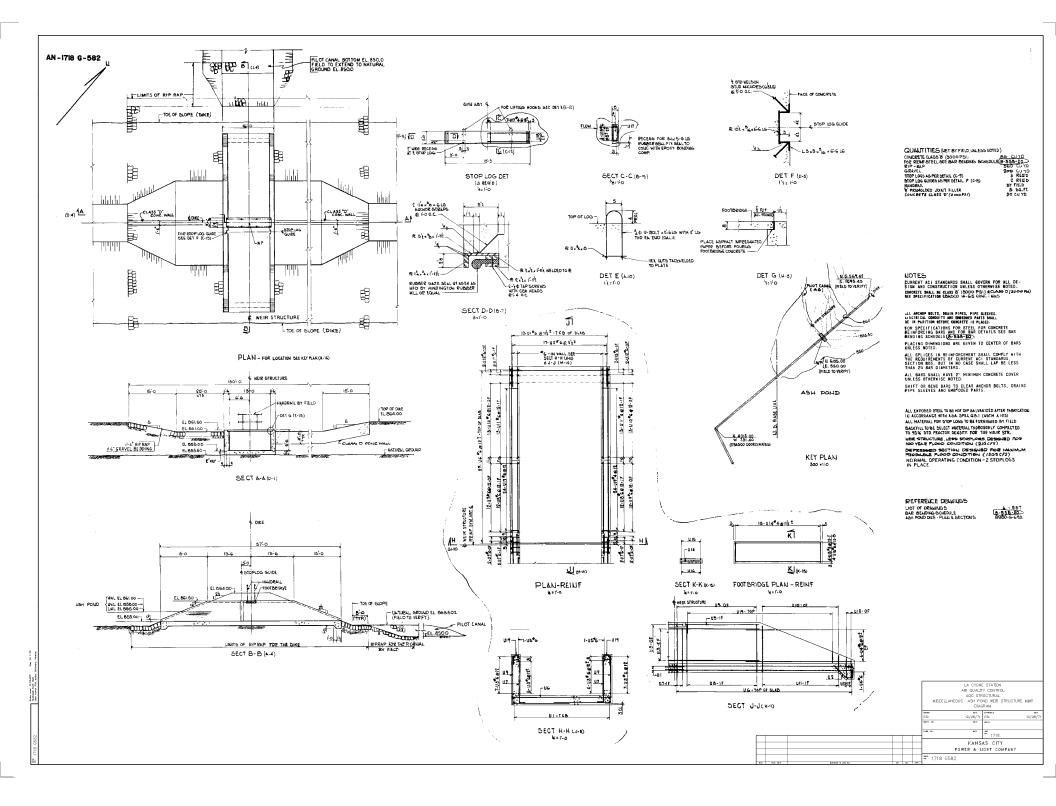
Attachment A Boicourt Quadrangle, Kansas 7.5-Minute Series

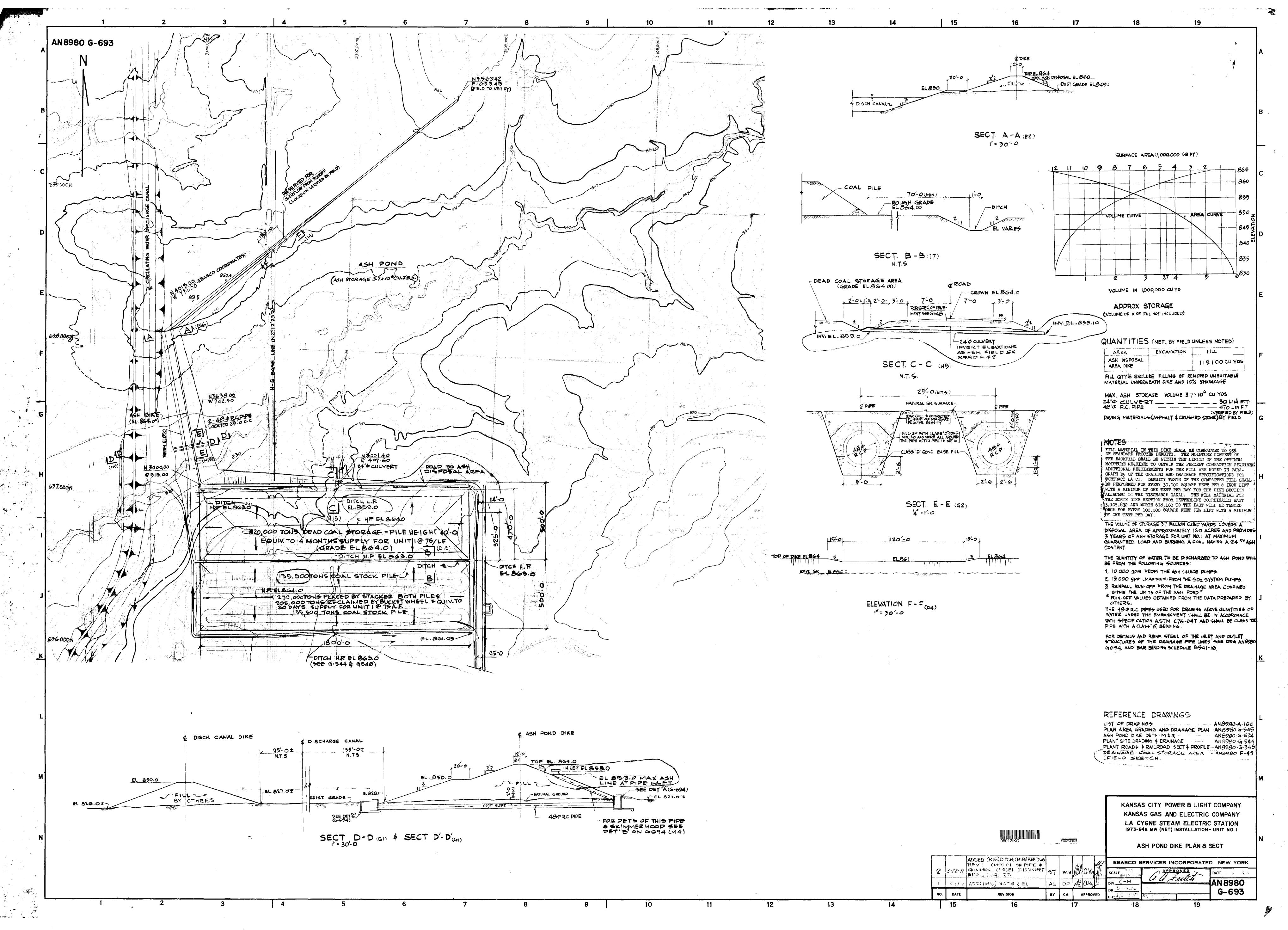


Attachment B Reference Drawings

Selected 1971 Ebasco Services Incorporated Drawings







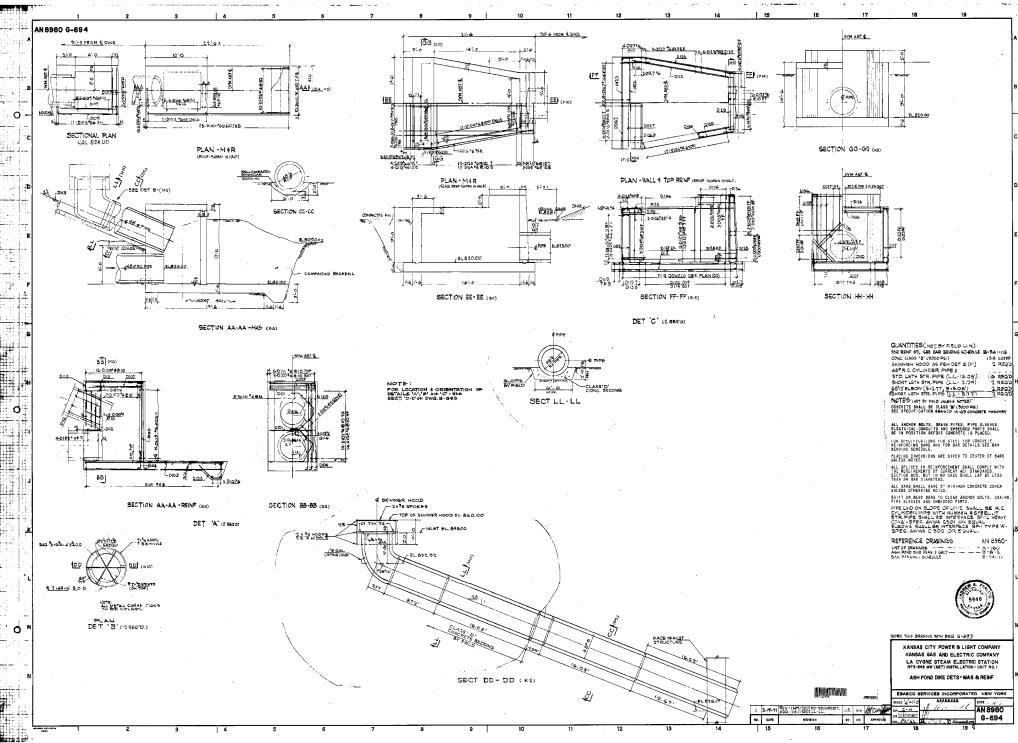
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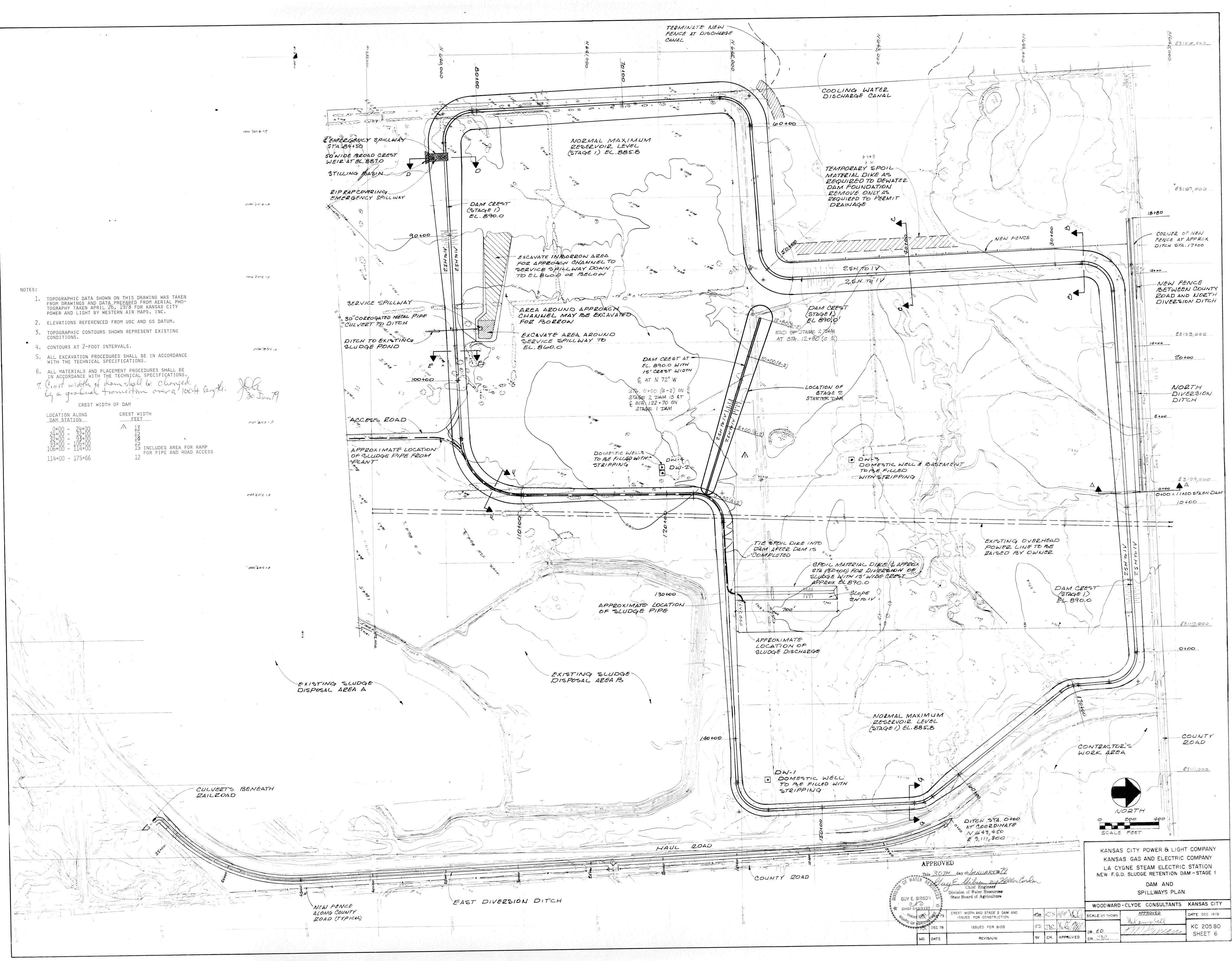
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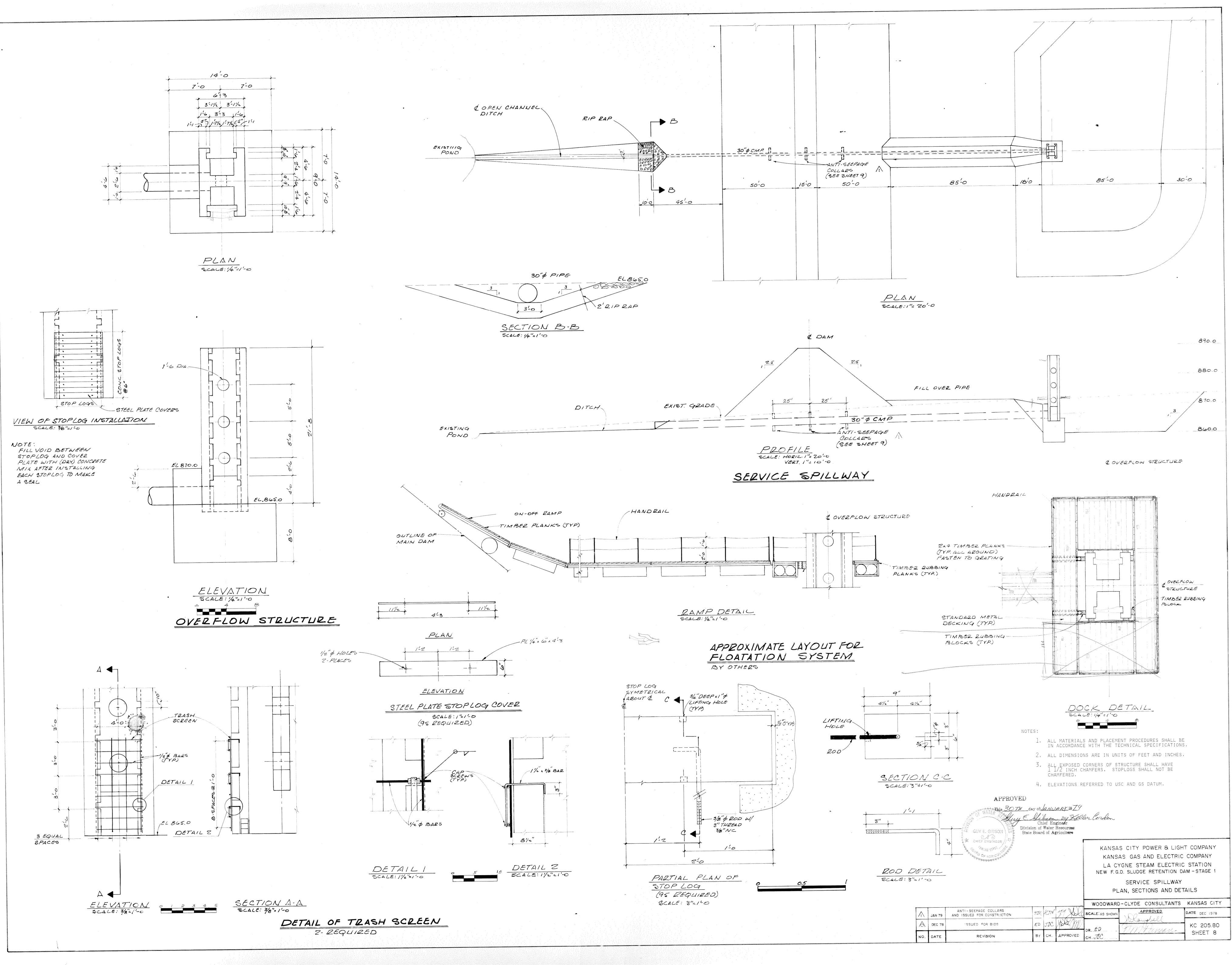
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Selected 1979 Woodward-Clyde Consultants Drawings





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