

# City of Independence



## POWER & LIGHT DEPARTMENT

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www.ci.independence.mo.us FAX • (816) 325-7474

December 19, 2017

Ms. Carol S. Comer, Director  
Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102

Re: City of Independence Power and Light  
Blue Valley Power Station - Inactive CCR Surface Impoundment  
**Notification of Closure Completion**

Dear Ms. Comer,

City of Independence, Power and Light Department (IPL), in response to the Federal Coal Combustion Residuals (CCR) Rule, 40 CFR Part 257 Subpart D, is notifying you of the completion of closure of the former inactive surface impoundments at the Blue Valley Plant, 21500 E. Truman Road, Independence, MO 64056.

The three former inactive CCR surface impoundment were closed in accordance with the requirements listed in Section 257.100 Paragraph (b)(1) through (4) of the CCR Rule. A two-acre portion of the bottom ash pond was closed in accordance with the requirements listed in Section 257.100 Paragraph (b)(5) in order to allow for construction of a new sedimentation basin for the site.

Attached are the required certifications of closure completion written and stamped by qualified professional engineer stating that the closures comply with the applicable portions of the CCR Rule.

If you have any questions please contact Eric Holder, IPL's Environmental Program Supervisor, at (816) 325-7455.

Sincerely,

A handwritten signature in black ink that reads "Andrew Boatright". The signature is written in a cursive, somewhat stylized font.

Andrew Boatright  
IPL Acting Director

Cc: Chris Weiberg, WPC  
Chris Nagel, SWM

City of Independence  
Independence Power & Light  
Blue Valley Power Station (BVPS)

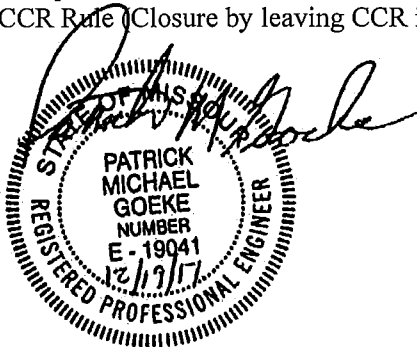
Coal Combustion Residual (CCR)  
North Fly Ash Impoundment Certification Completion of Closure

**Background**

The Blue Valley Power Station (BVPS) is owned and operated by City of Independence, Missouri. Three former inactive CCR impoundments were present on the BVPS property occupying approximately 41 acres of the site. Two fly ash impoundments were the North Fly Ash Pond (17 acres) and the South Fly Ash Pond (15 acres), and the third impoundment was the Bottom Ash Pond (9 acres).

**Professional Engineer Certification**

I hereby certify, as a Professional Engineer in the State of Missouri, that based on the observations of our staff and review of tests performed during the closure activities, the closure of the **17 acre North Fly Ash pond** located at the Blue Valley Power Station was completed in accordance with the requirements of Section 257.100, paragraphs (b)(1) through (4) of the CCR Rule (Closure by leaving CCR in place).



Patrick M. Goeke, P.E. (E-19041) (License renewal data is 12/31/18)

City of Independence  
Independence Power & Light  
Blue Valley Power Station (BVPS)

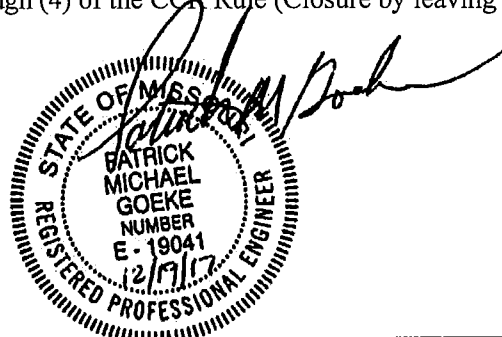
Coal Combustion Residual (CCR)  
South Fly Impoundment Certification Completion of Closure

**Background**

The Blue Valley Power Station (BVPS) is owned and operated by City of Independence, Missouri. Three former inactive CCR impoundments were present on the BVPS property occupying approximately 41 acres of the site. Two fly ash impoundments were the North Fly Ash Pond (17 acres) and the South Fly Ash Pond (15 acres), and the third impoundment was the Bottom Ash Pond (9 acres).

**Professional Engineer Certification**

I hereby certify, as a Professional Engineer in the State of Missouri, that based on the observations of our staff and review of tests performed during the closure activities, the closure of the **15 acre South Fly Ash pond** located at the Blue Valley Power Station was completed in accordance with the requirements of Section 257.100, paragraphs (b)(1) through (4) of the CCR Rule (Closure by leaving CCR in place).



Patrick M. Goeke, P.E. (E-19041) (License renewal data is 12/31/18)

City of Independence  
Independence Power & Light  
Blue Valley Power Station (BVPS)

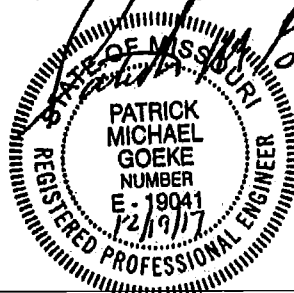
Coal Combustion Residual (CCR)  
Bottom Ash Impoundment Certification Completion of Closure

**Background**

The Blue Valley Power Station (BVPS) is owned and operated by City of Independence, Missouri. Three former inactive CCR impoundments were present on the BVPS property occupying approximately 41 acres of the site. Two fly ash impoundments were the North Fly Ash Pond (17 acres) and the South Fly Ash Pond (15 acres), and the third impoundment was the Bottom Ash Pond (9 acres).

**Professional Engineer Certification**

I hereby certify, as a Professional Engineer in the State of Missouri, that the closure of **approximately 7 acres of the 9-acre Bottom Ash pond** located at the Blue Valley Power Station was completed in accordance with the requirements of paragraph (b)(1) through (4) of the CCR Rules (Closure by leaving CCR in place) and that the clean closure of **approximately 2 acres of the of the 9-acre Bottom Ash pond** located at the Blue Valley Power Station was completed in accordance with the requirements of Section 257.100, paragraph (b)(5) of the CCR Rule (Closure through removal of CCR).



Patrick M. Goeke, P.E. (E-19041) (License renewal data is 12/31/18)