

14 February 2019  
Updated – 15 April 2019  
File No. 129778-018

Westar Energy, Inc.  
818 South Kansas Avenue  
Topeka, Kansas 66612

Attention: Jared Morrison – Manager, Water and Waste Programs

Subject: Assessment Monitoring Program September 2018 Sampling Event  
Statistically Significant Level Notification and Alternate Source Demonstration Update  
Jeffrey Energy Center – Fly Ash Landfill

Dear Mr. Morrison:

Westar Energy, Inc. (Westar) has implemented the United States Environmental Protection Agency Federal Coal Combustion Residuals (CCR) Rule (Code of Federal Regulations Title 40 [40 CFR] Sections §257 and 261) effective 19 October 2015, along with subsequent revisions, for the Jeffrey Energy Center in St. Marys, Kansas. Westar provided Haley & Aldrich, Inc. with groundwater monitoring data collected from the Fly Ash Landfill (FAL) groundwater monitoring system which meets the requirements of 40 CFR §257.91 and 40 CFR §257.93. This memorandum documents the results of statistical tests conducted to determine if Appendix IV groundwater monitoring constituents detected in wells downgradient of the FAL are present at a statistically significant level (SSL) above groundwater protection standards (GWPS) consistent with the requirements in 40 CFR § 257.95.

The results of the statistical analyses completed on 14 January 2019 of the September 2018 assessment monitoring sampling event data for each analyte/well combination indicate an SSL above GWPS for molybdenum at monitoring well MW-FAA-6.

Following identification of the SSL at the FAL, an evaluation was completed and successful demonstration made in accordance with 40 CFR § 257.95(g)(3)(ii) identifying that a source other than the CCR unit caused the SSL. As such, Westar will continue monitoring the FAL in accordance with the assessment monitoring program.

Sincerely yours,  
HALEY & ALDRICH, INC.



Steve Putrich, P.E.  
Project Principal



Mark Nicholls, P.G.  
Lead Hydrogeologist