



HALEY & ALDRICH, INC.  
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14 February 2019  
File No. 129778-020

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  
Tecumseh Energy Center – Bottom Ash Settling Area

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 Tecumseh Energy Center in Tecumseh, Kansas. Westar provided Haley & Aldrich, Inc. with groundwater monitoring data collected from the Bottom Ash Settling Area (BASA) groundwater monitoring system that 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 BASA 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 SSLs above GWPS for arsenic at monitoring wells MW-9 and MW-10 and for cobalt at monitoring well MW-9.

Sincerely yours,  
HALEY & ALDRICH, INC.

Steve Putrich, P.E.  
Project Principal



Mark Nicholls, P.G.  
Lead Hydrogeologist