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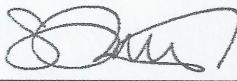
**SUBJECT:** Lawrence Energy Center – Groundwater Monitoring System Certification Existing 847 Landfill and inactive Area 2 Pond, Area 3 Pond, and Area 4 Pond  
Revised to Clarify Names of CCR Units and to Include the inactive Area 2 Pond, Area 3 Pond, and Area 4 Pond in Subject Certification  
Westar Energy, Inc.

Westar Energy, Inc. (Westar) operates the subject coal combustion residuals (CCR) management units referred to as 847 Landfill and inactive units Area 2 Pond, Area 3 Pond, and Area 4 Pond at the Lawrence Energy Center (LEC) located in Lawrence, Kansas. This document addresses the requirements of §257.91 *Groundwater Monitoring Systems*, specifically section §257.91(f), of the U.S. Environmental Protection Agency’s Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 Code of Federal Regulations (CFR) Part 257 (CCR Rule) effective 19 October 2015 and subsequent rulemaking revisions. The CCR units are considered subject to the CCR Rule since they were either active or identified as inactive with notification of intent to close as of the effective and/or applicable dates of the CCR Rule. This document serves as certification that the subject units comply with the requirements defined in the CCR Rule. This certification has been prepared based upon Haley & Aldrich, Inc.’s (Haley & Aldrich) investigation(s) and information made available by Westar pursuant to §257.91(e)(1).

Westar has determined, based upon Haley & Aldrich’s recommendations, that a multi-unit groundwater monitoring system is preferred for the inactive Area 2 Pond, Area 3 Pond, and Area 4 Pond as allowed pursuant to §257.91(d). This multi-unit monitoring system is as capable of detecting monitored constituents passing through the combined unit waste boundary as individual groundwater monitoring systems.


The single-unit groundwater monitoring system at the 847 Landfill and the multi-unit groundwater monitoring system at the inactive Area 2 Pond, Area 3 Pond, and Area 4 Pond have been designed to include, as a minimum, one up gradient and three down gradient monitoring wells pursuant to §257.91(c). The number, locations, and depths of wells used in the groundwater monitoring systems are sufficient and appropriate to characterize the quality of groundwater flowing beneath each single or multi-unit monitoring system based on site conceptual models and site-specific geologic conditions.

Pursuant to CFR Title 40 Chapter I Subchapter I Part 257 Subpart D §257.91(f), I certify that the groundwater monitoring systems for the subject units have been designed and constructed to meet the requirements of §257.91. The certification submitted is, to the best of my knowledge, accurate and complete.

Signed:   
\_\_\_\_\_  
Certifying Engineer

Print Name: Steven F. Putrich, P.E.  
Kansas License No.: PE24363  
Title: Principal Consultant  
Company: Haley & Aldrich, Inc.



Signed:   
\_\_\_\_\_  
Professional Geologist

Print Name: Mark D. Nicholls, P.G.  
Kansas License No.: 881  
Title: Lead Hydrogeologist  
Company: Haley & Aldrich, Inc.

