



HALEY & ALDRICH, INC.  
6500 Rockside Road  
Suite 200  
Cleveland, OH 44131  
216.739.0555

## MEMORANDUM

File No. 129778-019

**SUBJECT:** Updated Notification of Intent to Initiate Closure of an Inactive CCR Surface Impoundment – Inactive Ash Pond Area 2  
Westar Energy - Lawrence Energy Center  
Lawrence, Kansas

Westar Energy, Inc. (Westar) prepared an initial Notification of Intent to Initiate Closure of an Inactive CCR Surface Impoundment for the Inactive Ash Pond Area 2 at the Lawrence Energy Center (LEC) dated 10 December 2015 in accordance with §257.100(c)(1) of the USEPA CCR Rule, 40 CFR Part 257 (CCR Rule). Based on the USEPA Partial Vacatur (40 CFR Part 257 EPA-HQ-OLEM-2016-0274; FRL-9949-44-OLEM) effective 4 October 2016, the Inactive Ash Pond Area 2 is now “subject to all of the requirements of this subpart applicable to existing CCR surface impoundments” [§257.100(a)]. As such, Westar intends to complete the closure of the Inactive Ash Pond Area 2 within five years of the commencement of closure consistent with standard closure timeframes by no later January 2021, in accordance with §257.102(f)(1)(ii).

### Proposed Design Description

Westar has initiated closure of the Inactive Ash Pond Area 2 in January 2016. Westar intends to complete closure consistent with closure by removal but reserves the right to close the unit in accordance with the alternate closure options.

The CCR surface impoundment will be closed by unwatering remaining standing water that is impounded within the perimeter dikes. Westar has managed the water level within the impoundment in accordance with applicable site NPDES permit. Westar will proceed with excavating and removing CCRs from within the impoundment and disposing of the material either in the on-site Industrial Landfill No. 847 or to an off-site landfill permitted to receive CCRs, to meet the requirements of §257.102(c).

Westar will be preparing a closure plan in accordance with the Partial Vacatur for the Inactive Ash Pond Area 2 consistent with §257.102(b).

## Anticipated Closure Schedule

Commence Closure	January 2016
Closure Completion	January 2021

## Notification of Intent to Close

On behalf of Westar Energy, this document serves as an updated notification of intent to close the Inactive Ash Pond Area 2 at the Lawrence Energy Center in accordance with the allowable closure completion timeframes meeting the USEPA's CCR Rule requirements of §257.102(f). If Westar chooses to revise the closure plan by closing the unit in-place, a certifying statement that the final cover system meets the applicable CCR Rule requirements will be completed at that time.



\_\_\_\_\_  
Certifying Engineer

