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31 January 2018
File No. 129778-002

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

Attention: Jared Morrison
Manager, Water and Waste Programs

Subject: 2017 Annual Groundwater Monitoring and Corrective Action Report for the
Bottom Ash Area 1 Impoundment/Bottom Ash Area 1 Landfill
Jeffrey Energy Center
St. Marys, Kansas

Dear Mr. Morrison:

Haley & Aldrich, Inc. is pleased to submit this Annual Groundwater Monitoring and Corrective Action Report (Annual Report) for the multi-unit groundwater monitoring system for the Bottom Ash (BA) Area 1 Impoundment/BA Area 1 Landfill at the Jeffrey Energy Center. This Annual Report was developed in accordance with the United States Environmental Protection Agency CCR Rule effective 19 October 2015 (Rule), specifically Code of Federal Regulations Title 40, subsection § 257.90(e). The Annual Report documents the design and construction of the groundwater monitoring system for the BA Area 1 Impoundment/BA Area 1 Landfill consistent with applicable sections of § 257.90 through 257.98.

This report describes activities conducted in the prior calendar year and documents compliance with the Rule. The specific requirements listed in Sections § 257.90(e)(1)-(5) of the Rule are provided in bold/italic type, followed by a short narrative describing how the Rule has been met.

Sincerely yours,
HALEY & ALDRICH, INC.

A handwritten signature in blue ink, appearing to read "Steve Putrich".

Steve Putrich, P.E.
Project Principal

A handwritten signature in blue ink, appearing to read "Mark Nicholls".

Mark Nicholls, P.G.
Lead Hydrogeologist

2017 ANNUAL GROUNDWATER MONITORING
AND CORRECTIVE ACTION REPORT
BA AREA 1 IMPOUNDMENT/BA AREA 1 LANDFILL
JEFFREY ENERGY CENTER
ST. MARYS, KANSAS

by Haley & Aldrich, Inc.
Cleveland, Ohio

for Westar Energy, Inc.
Topeka, Kansas

File No. 129778-002
January 2018



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1	Bottom Ash Area 1 Impoundment/Landfill Monitoring Well Location Map

1. 40 CFR § 257.90 Applicability

1.1 40 CFR § 257.90(a)

Except as provided for in §257.100 for inactive CCR surface impoundments, all CCR landfills, CCR surface impoundments, and lateral expansions of CCR units are subject to the groundwater monitoring and corrective action requirements under §257.90 through 257.98.

The Bottom Ash (BA) Area 1 Impoundment/BA Area 1 Landfill at the Jeffrey Energy Center (JEC), which is the coal combustion residuals (CCR) management unit addressed in this Annual Groundwater Monitoring and Corrective Action Report (Annual Report), is subject to the groundwater monitoring and corrective action requirements described under Code of Federal Regulations Title 40 (40 CFR) § 257.90 through 257.98. In particular, this document addresses the requirement for the Owner/Operator to prepare an Annual Report per § 257.90(e) (Rule). These units are managed by a multi-unit groundwater monitoring system.

1.2 40 CFR § 257.90(e)

Annual groundwater monitoring and corrective action report. For existing CCR landfills and existing CCR surface impoundments, no later than January 31, 2018, and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For new CCR landfills, new CCR surface impoundments, and all lateral expansions of CCR units, the owner or operator must prepare the initial annual groundwater monitoring and corrective action report no later than January 31 of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by this subpart, and annually thereafter. For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. For purposes of this section, the owner or operator has prepared the annual report when the report is placed in the facility's operating record as required by §257.105(h)(1).

This Annual Report is the initial report for the JEC BA Area 1 Impoundment/BA Area 1 Landfill as required by the Rule as the groundwater monitoring system was established and certified by 17 October 2017. Prior to 17 October 2017, Westar installed a groundwater monitoring system at the BA Area 1 Impoundment/BA Area 1 Landfill consistent with § 257.91. Groundwater sampling and analysis was conducted per the requirements described in § 257.93, and the status of the groundwater monitoring program described in § 257.94 is provided in this report. This Annual Report documents the activities completed in the calendar year 2017.

At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:

- (1) A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;***

As required by § 257.90(e)(1), a map showing the locations of the CCR unit and associated upgradient and downgradient monitoring wells for the BA Area 1 Impoundment/BA Area 1 Landfill is included in this report as Figure 1. In addition, this information is presented in the CCR Groundwater Monitoring

Network Description Report prepared for Westar, which was placed in the facility's operating record by 17 October 2017 as required by § 257.105(h)(2).

(2) Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;

The design and construction of the monitoring well network for the BA Area 1 Impoundment/BA Area 1 Landfill at JEC are described in the CCR Groundwater Monitoring Network Description Report dated 17 October 2017. This report was placed in the facility's operating record by 17 October 2017, as required by § 257.105(h)(2). Since the groundwater monitoring system was certified, no new monitoring wells were installed or decommissioned.

(3) In addition to all the monitoring data obtained under §257.90 through §257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;

In accordance with § 257.94(b), eight independent samples from each background and downgradient monitoring well were collected prior to 17 October 2017. A summary table including the sample names, dates of sample collection, reason for sample collection (detection or assessment), and monitoring data obtained for the groundwater monitoring program for the BA Area 1 Impoundment/BA Area 1 Landfill is presented in Table I of this report. In 2017, the groundwater monitoring sampling and laboratory analyses were completed under the detection monitoring program.

(4) A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and

Detection monitoring was conducted in accordance with § 257.94(b), and no transitions between monitoring programs occurred for the BA Area 1 Impoundment/BA Area 1 Landfill in calendar year 2017.

(5) Other information required to be included in the annual report as specified in §257.90 through §257.98.

This initial Annual Report documents activities conducted to comply with § 257.90 through § 257.94 of the Rule. It is understood that there are supplemental references in § 257.90 through § 257.98 to information that must be placed in the Annual Report; however, none of the activities referenced as required in the Annual Report are relevant to the groundwater monitoring program for activities completed in calendar year 2017.

1.3 40 CFR § 257.90(f)

The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in § 257.105(h), the notification requirements specified in § 257.106(h), and the internet requirements specified in § 257.107(h).

To comply with the Rule recordkeeping requirements:

- Pursuant to § 257.105(h)(1), this Annual Report must be placed in the facility's operating record.
- Pursuant to § 257.106(h)(1), notification must be sent to the relevant State Director and/or Tribal authority within 30 days of this Annual Report being placed on the facility's operating record [§ 257.106(d)].
- Pursuant to § 257.107(h)(1), this Annual Report must be posted to the Westar CCR Website within 30 days of this Annual Report being placed on the facility's operating record [§ 257.107(d)].

TABLES

TABLE I
SUMMARY OF ANALYTICAL RESULTS
 Westar Jeffrey Energy Center
 Bottom Ash Area 1 Impoundment/Bottom Ash Area 1 Landfill
 St. Marys, Kansas

Location	Measure Point Elevation (TOC)	Sample Name	Sample Date	Depth to Water (btoc)	Groundwater Elevation (ft AMSL)	Field Parameters				USEPA Appendix III Constituents (mg/L)								USEPA Appendix IV Constituents (mg/L)												USEPA Appendix IV Constituents (pCi/L)		
						Temperature (Deg C)	Conductivity (µS/cm)	Turbidity (NTU)	pH (su)	Boron, Total	Calcium, Total	Chloride	Fluoride	Sulfate	pH (su)	TDS	Antimony, Total	Arsenic, Total	Barium, Total	Beryllium, Total	Cadmium, Total	Chromium, Total	Cobalt, Total	Lead, Total	Lithium, Total	Molybdenum, Total	Selenium, Total	Thallium, Total	Mercury, Total	Fluoride	Radium-226 & 228 Combined	
Up Gradient	MW-BAA-6	1301.81	BAA6-082516	8/25/2016	81.43	1220.38	17.59	4280	269	7.48	5.8	495	288	0.88	1790	7.1	3210	<0.0010	0.0037	0.039	<0.0010	<0.00050	0.0060	0.0016	<0.0050	0.16	0.0090	<0.0010	<0.0010	<0.00020	0.88	4.69
			BAA6-092216	9/22/2016	81.56	1220.25	17.25	3760	35.1	6.99	4.0	478	233	0.51	1840	7.1	3330	<0.0010	0.0013	0.022	<0.0010	<0.00050	<0.0050	0.0012	<0.0050	0.10	0.0065	<0.0010	<0.0010	<0.00020	0.51	3.08
			BAA-6-110316	11/3/2016	80.95	1220.86	14.39	3810	6.50	6.96	3.8	513	183	0.62	2070	7.1	3220	<0.0010	0.0012	0.021	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.095	0.0059	<0.0010	<0.0010	<0.00020	0.62	1.87
			BAA-6-121916	12/19/2016	81.10	1220.71	11.43	2750	32.6	6.36	1.7	358	195	0.60	1090	7.2	2080	<0.0010	0.0013	0.037	<0.0010	<0.00050	<0.0050	0.0020	<0.0050	0.059	0.0061	0.0013	<0.0010	<0.00020	0.60	1.83
			BAA-6-020817	2/8/2017	81.20	1220.61	12.90	3610	8.0	6.94	3.0	506	207	0.62	1710	7.2	3110	<0.0010	0.0014	0.020	<0.0010	<0.00050	<0.0050	0.0011	<0.0050	0.074	0.0047	<0.0010	<0.0010	<0.00020	0.62	3.44
			BAA-6-041017	4/10/2017	79.34	1222.47	14.65	3820	6.6	6.84	3.4	551	215	0.72	1860	6.9	3430	<0.0010	0.0014	0.019	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.081	0.0044	<0.0010	<0.0010	<0.00020	0.72	2.64
			BAA-6-052617	5/26/2017	79.66	1222.15	15.20	3860	4.1	6.77	2.8	518	204	0.76	1830	6.9	3280	<0.0010	0.0012	0.018	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.059	0.0036	<0.0010	<0.0010	<0.00020	0.76	3.12
BAA-6-062917	6/29/2017	80.57	1221.24	15.89	3730	3.3	6.82	2.6	515	215	0.35	1670	6.8	3140	<0.0010	0.0016	0.019	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.056	0.0031	<0.0010	<0.0010	<0.00020	0.35	3.64			
Down Gradient	MW-BAA-2	1226.56	BAA2-082516	8/25/2016	14.42	1212.14	18.25	2070	6.2	8.10	1.3	224	163	0.44	783	7.3	1510	<0.0010	0.0059	0.067	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.013	0.051	<0.0010	<0.0010	<0.00020	0.44	1.81
			BAA2-092216	9/22/2016	14.24	1212.32	18.22	1510	4.8	7.26	1.0	181	133	0.52	658	7.5	1340	<0.0010	0.0055	0.053	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.020	0.041	<0.0010	<0.0010	<0.00020	0.52	1.42
			BAA-2-110316	11/3/2016	13.99	1212.57	16.39	1319	4.0	7.03	1.1	188	137	0.51	983	7.5	1360	<0.0010	0.0062	0.055	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.020	0.044	<0.0010	<0.0010	<0.00020	0.51	1.32
			BAA-2-122016	12/20/2016	14.14	1212.42	14.39	1293	6.4	7.09	1.0	181	110	0.51	604	7.4	1180	<0.0010	0.0056	0.055	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.027	0.032	<0.0010	<0.0010	<0.00020	0.51	1.87
			BAA-2-020917	2/9/2017	14.03	1212.53	13.19	1204	4.6	6.94	0.92	172	103	0.50	570	7.5	1170	<0.0010	0.0045	0.049	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.021	0.031	<0.0010	<0.0010	<0.00020	0.50	0.945
			BAA-2-041017	4/10/2017	13.53	1213.03	16.03	1274	3.8	7.15	0.90	165	95.3	0.57	536	7.2	1150	<0.0010	0.0027	0.043	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.023	0.026	<0.0010	<0.0010	<0.00020	0.57	1.85
			BAA-2-052617	5/26/2017	13.74	1212.82	16.95	1820	3.9	7.09	1.2	195	144	0.49	769	7.4	1380	<0.0010	0.0053	0.042	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.012	0.047	<0.0010	<0.0010	<0.00020	0.49	2.41
			BAA-2-062917	6/29/2017	14.42	1212.14	17.86	1348	2.7	7.13	0.99	155	115	0.44	591	7.3	1180	<0.0010	0.0049	0.040	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.021	0.030	<0.0010	<0.0010	<0.00020	0.44	2.34
			BAA3-082616	8/26/2016	13.62	1208.38	17.33	3550	158	7.81	2.4	526	146	0.97	1900	7.6	3250	<0.0010	0.0022	0.050	<0.0010	<0.00050	0.011	0.0013	<0.0050	0.10	0.0026	<0.0010	<0.0010	<0.00020	0.97	3.00
			BAA3-092216	9/22/2016	13.75	1208.25	18.62	3570	92.0	7.13	2.3	496	154	1.0	2020	7.3	3110	<0.0010	0.0014	0.025	<0.0010	<0.00050	<0.0050	0.0010	<0.0050	0.10	0.0031	<0.0010	<0.0010	<0.00020	1.0	2.34
	BAA-3-110316	11/3/2016	12.25	1209.75	17.26	3300	48.2	6.85	2.3	507	157	0.92	2290	7.1	3150	<0.0010	<0.0010	0.015	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.095	0.0023	<0.0010	<0.0010	<0.00020	0.92	0.897		
	BAA-3-122016	12/20/2016	13.17	1208.83	13.56	3550	98.3	7.09	2.3	537	158	0.82	1950	7.1	3200	<0.0010	<0.0010	0.019	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.10	0.0029	<0.0010	<0.0010	<0.00020	0.82	2.12		
	BAA-3-020917	2/9/2017	12.62	1209.38	12.03	3570	41.6	6.96	2.1	519	156	0.86	2050	7.2	3380	<0.0010	<0.0010	0.011	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.083	0.0015	<0.0010	<0.0010	<0.00020	0.86	2.03		
	BAA-3-041017	4/10/2017	9.88	1212.12	15.19	3660	27.8	6.92	2.3	539	157	1.0	2080	7.0	3630	<0.0010	<0.0010	0.0098	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.089	0.0016	<0.0010	<0.0010	<0.00020	1.0	2.13		
	BAA-3-052617	5/26/2017	11.31	1210.69	16.70	3590	17.9	6.91	2.3	522	155	1.0	2130	7.2	3260	<0.0010	<0.0010	0.0076	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.072	0.0015	<0.0010	<0.0010	<0.00020	1.0	1.60		
	BAA-3-062917	6/29/2017	12.67	1209.33	17.49	3580	12.6	6.98	2.1	454	158	0.86	1940	7.1	3210	0.000062	0.0007	0.0074	0.0019	<0.000018	0.00087	0.00016	0.0034	0.087	0.0015	<0.000086	<0.000018	<0.000024	0.86	2.07		
	BAA-7-061717	6/17/2017	19.05	1194.10	16.74	2070	9.1	7.53	0.79	260	98.5	0.64	859	7.1	1760	<0.0010	<0.0010	0.051	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	0.037	0.018	<0.0010	<0.0010	<0.00020	0.64	1.30		
	BAA-7-071817	7/18/2017	20.34	1192.81	16.92	2580	3.4	7.35	1.3	235	190	0.73	927	7.3	1760	<0.0010	<0.0010	0.041	<0.0010	<0.00050	<0.0050	0.0011	<0.0050	0.011	0.062	<0.0010	<0.0010	<0.00020	0.73	1.49		
	BAA-7-072717	7/27/2017	19.68	1193.47	17.51	2220	3.6	7.20	1.1	256	190	0.90	912	7.4	1790	<0.0010	<0.0010	0.037	<0.0010	<0.00050	<0.0050	0.0013	<0.0050	0.013	0.063	<0.0010	<0.0010	<0.00020	0.90	0.748		
	BAA-7-080117	8/1/2017	20.08	1193.07	16.45	2420	2.3	7.07	1.2	241	186	0.79	893	7.4	1730	<0.0010	<0.0010	0.041	<0.0020	<0.00050	<0.010	0.0013	<0.0050	<0.020	0.071	<0.0010	<0.0010	<0.00020	0.79	1.16		
BAA-7-080717	8/7/2017	19.05	1194.10	17.55	2540	2.6	6.96	1.3	223	187	0.86	923	7.4	1960	<0.0010	<0.0010	0.039	<0.0010	<0.00050	<0.0050	0.0025	<0.0050	0.014	0.076	<0.0010	<0.0010	<0.00020	0.86	1.09			
BAA-7-081617	8/16/2017	19.87	1193.28	17.82	2520	3.1	6.95	1.3	234	201	0.85	950	7.3	1840	<0.0010	<0.0010	0.034	<0.0010	<0.00050	<0.0050	0.0013	<0.0050	0.015	0.071	<0.0010	<0.0010	<0.00020	0.85	0.549			
BAA-7-082317	8/23/2017	19.55	1193.60	17.21	2520	2.8	6.86	1.3	230	199	0.78	926	7.3	1850	<0.0010	<0.0010	0.033	<0.0010	<0.00050	<0.0050	0.0013	<0.0050	0.012	0.074	<0.0010	<0.0010	<0.00020	0.78	1.09			
BAA-7-082817	8/28/2017	19.80	1193.35	18.28	2500	3.4	7.00	1.3	222	195	0.75	936	7.4	1760	<0.0010	<0.0010	0.033	<0.0010	<0.00050	<0.0050	0.0013	<0.0050	0.010	0.069	<0.0010	<0.0010	<0.00020	0.75	1.33			




ABBREVIATIONS AND NOTES:
bold value: Detection above laboratory reporting limit
 USEPA, 2016. Final Rule: Disposal of Coal Combustion Residuals from Electric Utilities. July 26. 40 CFR Part 257. <https://www.epa.gov/coalash/coal-ash-rule>
 µS/cm = microSiemen per centimeter
 btoc = below top of casing
 C = Celsius
 C

FIGURES

GIS FILE PATH: \\haleyaldrich.com\share\pfx_common\Projects\Westar\Jeffrey Energy Center (JEC)\GIS\MXDs\2018_01\JEC_BOTTOM ASH_AREA1_MW_LOCATION_MAP_REV2.mxd — USER: lbuce — LAST SAVED: 1/30/2018 5:42:40 PM

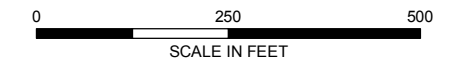


LEGEND

-  MONITORING WELL
-  PIEZOMETRIC OBSERVATION ONLY
-  BOTTOM ASH AREA 1 LIMITS OF DISPOSAL AREA

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: ESRI



HALEY ALDRICH WESTAR ENERGY
JEFFREY ENERGY CENTER
ST. MARY'S, KANSAS

**BOTTOM ASH AREA 1
MONITORING WELL LOCATION MAP**

JANUARY 2018

FIGURE 1