



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

MEMORANDUM

10 December 2015
File No. 41938-014

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

Westar Energy (Westar) operates the coal-fired generation Lawrence Energy Center (LEC) located approximately 3 miles northwest of Lawrence, Kansas. Ash Pond Area 2 (composed of Ponds 2-501, 2-502, 2-503, 2-504, Ditch, and Storm Water Settling Pond) is currently part of a pond system used to manage process water at the LEC. This pond historically received scrubber byproduct directly and other plant process water. Westar has designated Ash Pond Area 2 as inactive as defined by USEPA Final CCR Rule, 40 CFR Part 257 (Final CCR Rule), specifically §257.53. Westar intends to complete the closure of Ash Pond Area 2 by no later than April 17, 2018, in accordance with §257.100(b). This document serves as Westar's notification of intent to initiate closure of the CCR surface impoundment per §257.100(c)(1) of the Final CCR Rule.

Proposed Design Description

Westar proposes to close Ash Pond Area 2 in accordance with §257.100(b)(5) by April 17, 2018. To meet this timeline, Westar will commence the closure design, obtain Kansas Department of Health and Environment (KDHE) closure design approval, and complete closure activities between the Effective Date of the Final CCR Rule and the closure completion deadline.

The inactive CCR surface impoundment will be closed by redirecting plant process water to allow for dewatering of standing water that is impounded. 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. Ponds 2-501 and 2-502 have clay liners that will also be removed in accordance with the inactive impoundment closure requirements. The unlined stormwater settling pond has historic CCRs that will also be excavated and removed. Ponds 2-503, 2-504, and other areas historically received CCRs which Westar previously excavated, removed, and placed a clay liner in those areas for continued non-CCR process water management. Within the Ash Pond Area 2, intermediate berms may contain historically beneficially reused CCRs. This historic beneficial use will continue following the CCRs excavation and the beneficially reused CCRs will remain in place.

Anticipated Closure Schedule

Commence Closure Design	January 2016
Anticipated Closure Design Completion	June 2016
Anticipated KDHE Closure Permit Issuance	September 2016
Anticipated Initiation of Closure Construction	October 2016
Anticipated Closure Construction Completion	April 17, 2018

Note: Design, agency interaction, and construction dates are tentative.

Professional Engineer Certification

I certify that the closure of Westar's Ash Pond Area 2 at the Lawrence Energy Center pursuant to §257.100(b)(5), as described above, is technically feasible to be completed by April 17th, 2018, pursuant to §257.100(b).


Certifying Engineer





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MEMORANDUM

10 December 2015
File No. 41938-014

SUBJECT: Notification of Intent to Initiate Closure of an Inactive CCR Surface Impoundment
Ash Pond Area 3
Westar Energy - Lawrence Energy Center
Lawrence, Kansas

Westar Energy (Westar) operates the coal-fired generation Lawrence Energy Center (LEC) located approximately 3 miles northwest of Lawrence, Kansas. Ash Pond Area 3 (composed of Ponds 3-401, 3-402, 3-403, and 3-404) is currently part of a pond system used to manage process water at the LEC. This pond historically received scrubber byproduct directly and other plant process water. Westar has designated Ash Pond Area 3 as inactive as defined by USEPA Final CCR Rule, 40 CFR Part 257 (Final CCR Rule), specifically §257.53. Westar intends to complete the closure of Ash Pond Area 3 by no later than April 17, 2018, in accordance with §257.100(b). This document serves as Westar's notification of intent to initiate closure of the CCR surface impoundment per §257.100(c)(1) of the Final CCR Rule.

Proposed Design Description

Westar proposes to close Ash Pond Area 3 in accordance with §257.100(b)(5) by April 17, 2018. To meet this timeline, Westar will commence the closure design, obtain Kansas Department of Health and Environment (KDHE) closure design approval, and complete closure activities between the Effective Date of the Final CCR Rule and the closure completion deadline.

The inactive CCR surface impoundment will be closed by redirecting plant process water to allow for dewatering standing water that is impounded. Westar will proceed with excavating and removing CCR 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. Ponds 3-401, 3-402, and 3-403 have clay liners that will also be removed in accordance with the inactive impoundment closure requirements. Pond 3-404 historically received CCRs which Westar previously excavated, removed, and placed a clay liner in that area for continued non-CCR process water management. Within the Ash Pond Area 3, intermediate berms may contain historically beneficially reused CCRs. This historic beneficial use will continue following the CCRs excavation and the beneficially reused CCRs will remain in place.

Anticipated Closure Schedule

Commence Closure Design	January 2016
Anticipated Closure Design Completion	June 2016
Anticipated KDHE Closure Permit Issuance	September 2016
Anticipated Initiation of Closure Construction	October 2016
Anticipated Closure Construction Completion	April 17, 2018

Note: Design, agency interaction, and construction dates are tentative.

Professional Engineer Certification

I certify that the closure of Westar's Ash Pond Area 3 at the Lawrence Energy Center pursuant to §257.100(b)(5), as described above, is technically feasible to be completed by April 17th, 2018, pursuant to §257.100(b).



Certifying Engineer





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MEMORANDUM

10 December 2015
File No. 41938-014

SUBJECT: Notification of Intent to Initiate Closure of an Inactive CCR Surface Impoundment
Ash Pond 4
Westar Energy - Lawrence Energy Center
Lawrence, Kansas

Westar Energy (Westar) operates the coal-fired generation Lawrence Energy Center (LEC) located approximately 3 miles northwest of Lawrence, Kansas. Ash Pond 4 currently is the final clarifying pond of a pond system used to manage process water at the LEC. This pond historically received scrubber byproduct. Westar has designated Ash Pond 4 as inactive as defined by USEPA Final CCR Rule, 40 CFR Part 257 (Final CCR Rule), specifically §257.53. Westar intends to complete the closure of Ash Pond 4 by no later than April 17, 2018, in accordance with §257.100(b). This document serves as Westar's notification of intent to initiate closure of the CCR surface impoundment per §257.100(c)(1) of the Final CCR Rule.

Proposed Design Description

Westar proposes to close Ash Pond 4 in accordance with §257.100(b)(5) by April 17, 2018. To meet this timeline, Westar will commence the closure design, obtain Kansas Department of Health and Environment (KDHE) closure design approval, and complete closure activities between the Effective Date of the Final CCR Rule and the closure completion deadline.

The inactive CCR surface impoundment will be closed by redirecting plant process water around this impoundment and then initially dewatering standing water that is impounded. Westar will proceed with excavating and removing CCR 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. No bottom liner exists in this impoundment.

Anticipated Closure Schedule

Commence Closure Design	January 2016
Anticipated Closure Design Completion	June 2016
Anticipated KDHE Closure Permit Issuance	September 2016
Anticipated Initiation of Closure Construction	October 2016
Anticipated Closure Construction Completion	April 17, 2018

Note: Design, agency interaction, and construction dates are tentative.

Professional Engineer Certification

I certify that the closure of Westar's Ash Pond 4 at the Lawrence Energy Center pursuant to §257.100(b)(5), as described above, is technically feasible to be completed by April 17th, 2018, pursuant to §257.100(b).



Certifying Engineer

