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## MEMORANDUM

10 December 2015  
File No. 41938-013

**SUBJECT:** Notification of Intent to Initiate Closure of an Inactive CCR Surface Impoundment  
Bottom Ash Pond  
Westar Energy - Jeffrey Energy Center  
St. Marys, Kansas

Westar Energy, Inc. (Westar) operates the coal-fired generation Jeffrey Energy Center (JEC) located approximately 7 miles northwest of St. Marys, Kansas. Westar has designated the Bottom Ash Pond 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 the Bottom Ash Pond 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 the Bottom Ash Pond in accordance with §257.100(b)(1)-(4) 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 construction between the Effective Date of the Final CCR Rule and the closure completion deadline.

The CCR surface impoundment will be closed by routing non-CCR wastewater and surface drainage around the inactive Bottom Ash Pond and dewater standing water that is impounded. That water will be directed to the adjacent process water pond which primarily recirculates water back into the plant. Balance of existing materials and imported fill material will be placed to elevations to prevent the future ponding of water (with surface water runoff being the potential source of future ponding). The dam will also likely be partially breached to support drainage.

Fill material will be placed as an engineered fill above the existing ash grades and graded to develop an adequately sloped drainage crown to promote storm water drainage gravity flow off of the final cover system and into perimeter drainage features. This will create a suitable stable base to support the construction of the final cover system. Appropriate engineering calculations will be completed to verify stability of the final cover system. Settlement calculations will be completed to assist in the design of the cover subgrades.

The final cover system will be designed and constructed to meet the USEPA's Final CCR Rule requirements of either §257.100(b)(3)(i) or § 257.100(b)(3)(ii). The proposed final cover system will have a permeability less than or equal to any natural subsoils present, or no greater than  $1 \times 10^{-5}$  cm/s,

whichever is less, and a minimum 18-inch infiltration layer will minimize the infiltration of liquids through the CCR unit. An equivalent alternative may also be chosen. Erosion of the final cover system will be minimized by the placement of a minimum 6-inch erosion layer, capable of supporting native plant growth. It is anticipated that soils will be imported from adjacent borrow areas proximate to the inactive impoundment and the plant.

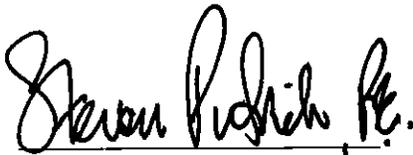
### Anticipated Closure Schedule

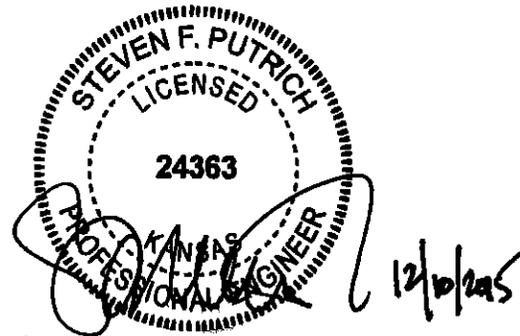
Commence Closure Design	January 2016
Anticipated Closure Design Completion	June 2016
Anticipated KDHE Closure Permit Issuance	September 2016
Anticipated Initiation of Closure Construction	October 2016
Anticipated Closure Construction Completion	April 17, 2018

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

### Professional Engineer Certification

I certify that the above-referenced proposed final cover system options for Westar's closure of the Bottom Ash Pond at the Jeffrey Energy Center meet the USEPA's Final CCR Rule requirements of either §257.100(b)(3)(i) or § 257.100(b)(3)(ii).

  
Certifying Engineer



I certify that the closure of Westar's Bottom Ash Pond at the Jeffrey Energy Center pursuant to §257.100(b)(1)-(4), as described above, is technically feasible to be completed by April 17<sup>th</sup>, 2018, pursuant to §257.100(b).

  
Certifying Engineer

