SUBJECT: Jeffrey Energy Center – Groundwater Monitoring Systems Certification
Existing Bottom Ash Settling Area/Bottom Ash Landfill, Fly Ash Landfill, Flue Gas
Desulfurization Landfill (Phase IA & IB), and inactive Bottom Ash Pond
Revised to Clarify Names of CCR Units and to Include the inactive Bottom Ash Pond in
Subject Certification
Westar Energy, Inc.

Westar Energy, Inc. (Westar) operates the subject coal combustion residuals (CCR) management units
referred to as the Bottom Ash Settling Area (also known as the Bottom Ash Area 1 Impoundment)/
Bottom Ash Landfill (also known as the Bottom Ash Area 1 Landfill ) (BASA/BAL), Fly Ash Landfill (FAL),
Flue Gas Desulfurization (FGD) Landfill (Phase IA & IB), and the inactive Bottom Ash Pond (BAP) at the
Jeffrey Energy Center (JEC) located in St. Marys, Kansas. These CCR units are considered subject to the
CCR Rule since they were either active or identified as inactive with a notification of intent to close as of
the effective and/or applicable dates of the CCR Rule. This document addresses the requirements of
§257.91 Groundwater Monitoring Systems, specifically section §257.91(f), of the U.S. Environmental
Protection Agency (EPA) Hazardous and Solid Waste Management System; Disposal of Coal Combustion
effective 19 October 2015, and subsequent rulemaking revisions. 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’s investigation(s) and information made available by Westar
pursuant to §257.91(e)(1).

Westar has determined, based upon Haley & Aldrich recommendations, that a multi-unit groundwater
monitoring system is preferred for the BASA/BAL 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 systems at the FAL, FGD Landfill, and the BAP and the multi-unit
groundwater monitoring system at the BASA/BAL have been designed to include, as a minimum, one up
gradient and three down gradient monitoring wells pursuant to §257.91(c). The FAL, FGD Landfill, the
BAP, and the multi-unit BASA/BAL monitoring systems have the minimum number of required
monitoring wells and this is deemed to be 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 40 CFR 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: [Signature]
Certifying Engineer
Print Name: Steven F. Putrich, P.E.
Kansas License No.: PE24363
Title: Principal Consultant
Company: Haley & Aldrich, Inc.

Signed: [Signature]
Professional Geologist
Print Name: Mark D. Nicholls, P.G.
Kansas License No.: 881
Title: Lead Hydrogeologist
Company: Haley & Aldrich, Inc.