



April 13, 2018

Ms. Ingrid Setzler
Environmental Director
Kansas City Board of Public Utilities
300 N 65th Street
Kansas City, Kansas, 66102

Re: Notification of the Establishment of Assessment Monitoring Program at the Bottom Ash Pond

Dear Ms. Setzler:

This letter has been prepared on behalf of Kansas City Board of Public Utilities (BPU) as notification to the Nearman Creek Power Station's Operating Record in accordance with 40 CFR § 257.94(e)(3) that an assessment monitoring program has been established for the Bottom Ash Pond in accordance with 40 CFR § 257.95. Results from the assessment monitoring program will be included in the 2018 Annual Groundwater Monitoring Report to be completed by January 31, 2019 in accordance with 40 CFR § 257.90(e). Subsequent notifications to the operating record will be prepared as required by 40 CFR § 257.

Per 40 CFR § 257.95(b), each of the monitoring wells included in the Bottom Ash Pond monitoring well network were sampled for the full list of 40 CFR § 257 Appendix IV parameters in March of 2018, within 90 days of triggering the assessment monitoring program. Within 90 days of analyzing samples collected during the March 2018 sampling event, and on a semiannual basis thereafter, the Bottom Ash Pond wells will be resampled for 40 CFR § 257 Appendix III parameters and those Appendix IV parameters that were detected during March 2018 monitoring (herein referred to as the "reduced Appendix IV list"). The full list of Appendix IV parameters will be sampled annually hereafter to determine if modifications to the reduced Appendix IV list are needed.

As data is collected, it will be evaluated in accordance with 40 CFR § 257.90 through 40 CFR § 257.95. Groundwater protection standards will be established for constituents detected as part of the assessment monitoring program as presented in 40 CFR § 257.95(h). The assessment monitoring program will continue until the concentrations of all constituents listed in Appendices III and IV of CFR § 257.95 are shown to be at or below background values, using the statistical procedures in 40 CFR § 257.93(g), for two consecutive sampling events or closure requirements have been satisfied per 40 CFR § 257.102(c). Should the assessment monitoring program be discontinued, notification to the Operating Record shall be made per the requirements of 40 CFR § 257.105.



Sincerely,

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

Mr. Scott A. Martin, PE
Professional Engineer

A handwritten signature in blue ink, appearing to read "B. Hoyer".

Mr. Brian Hoyer, PG
Project Manager

BRH/brh