



October 16, 2017

Sunflower Electric Power Corporation
P.O. Box 430
Holcomb Kansas 67851

Attention: Mr. Rockie Gottsponer via email: rgottsponer@sunflower.net

Reference: Holcomb Station CCR Landfill, Permit 420, Holcomb, Kansas
Groundwater Monitoring Network Certification
AEC File No. 15065-6:4908

Dear Mr. Gottsponer:

Sunflower Electric Power Corporation retained Allied Environmental Consultants (AEC) in 2015 to provide professional engineering services to meet certain requirements of *40 CFR Part 257 and 261, Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCR) from Electric Utilities*. The regulations of *40 CFR 257.91* provide requirements for a groundwater monitoring system, including the installation of "a sufficient number of wells, installed in appropriate locations and depths, to yield groundwater samples from the upper-most aquifer..." Furthermore, *40 CFR 257.91(b)* states that "the number, spacing, and depths of monitoring wells shall be determined based upon site-specific technical information, including characterization of:" the hydrogeological nature of the aquifer(s) underlying the CCR unit.

The regulations of *40 CFR 257.93* provide requirements for groundwater sampling and analysis requirements. *40 CFR 257.93(f)* through *(h)* provide the requirements for statistical analysis of groundwater monitoring data. As outlined in the Facility Groundwater Sampling and Analysis Plan dated June 23, 2016, the facility will utilize the Sanitas Technologies statistical analysis software and will initially evaluate results using an intrawell prediction limit test to determine statistically significant increases over background data of each constituent at each monitoring well. When a sufficient data pool is available, the facility will also analyze for seasonal variability using the Seasonal Kendall Test.

Accordingly, AEC, through the professionals signing and placing their respective seals below, hereby certifies that Sunflower has:

1. Completed the hydrogeological evaluation as required by *40 CFR 257.91(b)* via a report dated November 23, 2015 and on file with Sunflower's program documents.
2. Designed and installed a groundwater monitoring well network consisting of six (6) wells placed at locations that meet (and exceed) the requirements of *40 CFR 257.91(c)* and *257.91(e)*, and reported to the Kansas Department of Health and Environment (KDHE), Bureau of Waste (BWM) in a letter dated February 29, 2016 and maintained on file with Sunflower's program documents.
3. Developed a groundwater monitoring program, inclusive of a statistical analytical program, as required by *40 CFR 257.93*, inclusive of preparing a written Sampling and Analysis Plan (SAP) that guides sampling of the groundwater monitoring network as well as the statistical requirements for the subject facility. The selected statistical methods stated therein are appropriate for evaluating the monitoring data at the facility, as described in *40 CFR 257.93*. Sunflower retains a copy of the current SAP, dated June 23, 2016, on file with the program documents.

Please forward a copy of this letter to Mr. Wally Mack of the Kansas Department of Health and Environment (KDHE), Bureau of Waste (BWM) to demonstrate compliance with 40 CFR 257.91(f).

Sincerely,

ALLIED ENVIRONMENTAL CONSULTANTS, INC.



Paul R. Clark, P.G.
Project Geologist



Ted Francis, P.E.
Project Engineer