

**2019 – 2020 ANNUAL GROUNDWATER MONITORING
AND CORRECTIVE ACTION REPORT**

BOTTOM ASH POND
JEFFREY ENERGY CENTER
ST. MARYS, KANSAS

by Haley & Aldrich, Inc.
Cleveland, Ohio

for Evergy Kansas Central, Inc.
Topeka, Kansas

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**2019 – 2020 Annual Groundwater Monitoring
and Corrective Action Report**

This Annual Groundwater Monitoring and Corrective Action Report documents the groundwater monitoring program for the Jeffrey Energy Center (JEC) inactive Bottom Ash Pond (BAP) consistent with applicable sections of Code of Federal Regulations Title 40 §§ 257.90 through 257.98, and describes activities conducted from July 2019 through June 2020 and documents compliance with the United States Environmental Protection Agency Coal Combustion Residual Rule. I certify that the 2019 – 2020 Annual Groundwater Monitoring and Corrective Action Report for the JEC BAP (inactive) is, to the best of my knowledge, accurate and complete.

Signed: 
Professional Geologist

Print Name: Mark Nicholls
Kansas License No.: Professional Geologist No. 881
Title: Technical Expert 2
Company: Haley & Aldrich, Inc.



1. Introduction

This 2019 – 2020 Annual Groundwater Monitoring and Corrective Action Report (Annual Report) addresses the inactive Bottom Ash Pond (BAP) at the Jeffrey Energy Center (JEC), operated by Evergy Kansas Central, Inc. (Evergy; f/k/a Westar Energy, Inc.). This Annual Report was developed in accordance with the U.S. Environmental Protection Agency (USEPA) Coal Combustion Residual (CCR) Rule (Rule) effective 19 October 2015, including subsequent revisions, specifically Code of Federal Regulations Title 40 (40 CFR), subsection § 257.90(e). Evergy prepared and placed in the facility's operating record a notification of intent to initiate closure of the BAP by 17 December 2015. Due to the USEPA Extension of Compliance Deadlines for Certain Inactive Surface Impoundments, Response to Partial Vacatur effective 4 October 2016, in accordance with the requirement under § 257.100(e)(1), the alternative reporting timeframes specified in § 257.100(e)(2) through (6) are applicable for the BAP.

This Annual Report documents the groundwater monitoring system and results for the BAP consistent with applicable sections of §§ 257.90 through 257.98, describes activities conducted between July 2019 and June 2020, and documents compliance with the Rule. The specific requirements listed in § 257.90(e)(1) through (5) of the Rule are provided in Section 2 of this Annual Report and are in bold italic font, followed by a short narrative describing how each Rule requirement has been met.

2. 40 CFR § 257.90 Applicability

2.1 40 CFR § 257.90(a)

All CCR landfills, CCR surface impoundments, and lateral expansions of CCR units are subject to the groundwater monitoring and corrective action requirements under §§ 257.90 through 257.99, except as provided in paragraph (g) of this section.

Energy has installed and certified a groundwater monitoring system at the JEC BAP. The BAP is subject to the groundwater monitoring and corrective action requirements described under 40 CFR §§ 257.90 through 257.98. This document addresses the requirement for the Owner/Operator to prepare an Annual Report per § 257.90(e).

2.2 40 CFR § 257.90(e) – SUMMARY

Annual groundwater monitoring and corrective action report. For existing CCR landfills and existing CCR surface impoundments, no later than January 31, 2018, and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For new CCR landfills, new CCR surface impoundments, and all lateral expansions of CCR units, the owner or operator must prepare the initial annual groundwater monitoring and corrective action report no later than January 31 of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by this subpart, and annually thereafter. For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. For purposes of this section, the owner or operator has prepared the annual report when the report is placed in the facility's operating record as required by §257.105(h)(1).

40 CFR 257.100(e)(5)(ii)

No later than August 1, 2019, prepare the initial groundwater monitoring and corrective action report as set forth in § 257.90(e).

This Annual Report describes monitoring completed and actions taken for the groundwater monitoring system at JEC BAP (inactive) as required by the Rule. Groundwater sampling and analysis was conducted per the requirements described in § 257.93, and the status of the groundwater monitoring program described in § 257.94 and § 257.95 is also provided in this report. This Annual Report documents the applicable groundwater-related activities completed from July 2019 through June 2020.

2.2.1 Status of the Groundwater Monitoring Program

The BAP was in the detection monitoring program through September 2019. The first annual assessment monitoring event occurred in December 2019 with laboratory analyses completed in January 2020, thus establishing an assessment monitoring program. The BAP has remained in the assessment monitoring program through June 2020.

2019 – 2020 Annual Groundwater Monitoring and Corrective Action Report

2.2.2 Key Actions Completed

The 2018 – 2019 Annual Groundwater Monitoring and Corrective Action Report was completed in July 2019 for the time period through June 2019. Statistical evaluation was completed in July 2019 on analytical data from the March 2019 detection monitoring sampling event and statistically significant increases (SSI) over background concentrations were identified. An alternative source demonstration (ASD) was not successfully completed within 90 days for the March 2019 detection monitoring sampling event.

A semi-annual detection monitoring sampling event was completed in September 2019 for Appendix III constituents while the ASD was being pursued. Since the ASD was not successfully completed for the March 2019 detection monitoring sampling event, statistical evaluation was not completed on analytical data from the September 2019 detection monitoring sampling event.

The initial annual assessment monitoring sampling event was completed in December 2019, with laboratory analyses completed in January 2020, thus establishing an assessment monitoring program. This sampling event identified detected Appendix IV constituents for subsequent semi-annual sampling events in March and September 2020. Groundwater protection standards for detected Appendix IV constituents were established at that time. Semi-annual assessment monitoring sampling was completed in March 2020 for detected Appendix IV constituents identified during the December 2019 annual monitoring event. Statistical evaluation of the results from the March 2020 semi-annual assessment monitoring sampling event are due to be completed in July 2020 and will be reported in the next annual report.

2.2.3 Problems Encountered

No noteworthy problems (i.e., problems could include damaged wells, issues with sample collection or lack of sampling, or problems with analytical analysis) were encountered at the BAP from July 2019 through June 2020.

2.2.4 Actions to Resolve Problems

No problems were encountered at the BAP from July 2019 through June 2020; therefore, no actions to resolve the problems were required.

2.2.5 Project Key Activities for Upcoming Year

Key activities planned for July 2020 through June 2021 include the 2019 – 2020 Annual Groundwater Monitoring and Corrective Action Report, statistical analysis of assessment monitoring analytical data collected in March 2020, semi-annual assessment monitoring and subsequent statistical evaluations, and annual assessment monitoring.

2.3 40 CFR § 257.90(e) – INFORMATION

At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:

2.3.1 40 CFR § 257.90(e)(1) – CCR Unit and Monitoring Well Network

A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;

As required by § 257.90(e)(1), a map showing the locations of the CCR unit and associated upgradient and downgradient monitoring wells for the JEC BAP is included in this report as Figure 1.

2.3.2 40 CFR § 257.90(e)(2) – Monitoring System Changes

Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;

No monitoring wells were installed or decommissioned from July 2019 to June 2020.

2.3.3 40 CFR § 257.90(e)(3) – Summary of Sampling Events

In addition to all the monitoring data obtained under § 257.90 through § 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;

In accordance with § 257.95(b), one independent detection monitoring sample was collected from each background and downgradient monitoring well in September 2019. Two independent assessment monitoring samples were collected from each background and downgradient well in December 2019 (Appendix IV constituents only) and March 2020. A summary including sample names, dates of sample collection, field parameters, and monitoring data obtained for the groundwater monitoring program for the BAP is presented in Table I of this report.

2.3.4 40 CFR § 257.90(e)(4) – Monitoring Transition Narrative

A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and

Detection monitoring was conducted in accordance with § 257.94(b) through September 2019. SSIs identified during the March 2019 detection monitoring sampling event are provided in Table II. The initial annual assessment monitoring sampling event was completed in December 2019 in accordance with § 257.95(b) with laboratory results completed in January 2020, thus establishing an assessment monitoring program. Assessment monitoring samples from March 2020 were collected in accordance with § 257.95(d)(1).

2.3.5 40 CFR § 257.90(e)(5) – Other Requirements

Other information required to be included in the annual report as specified in § 257.90 through § 257.98.

This Annual Report documents activities conducted to comply with §§ 257.90 through 257.95 of the Rule. It is understood that there are supplemental references in §§ 257.90 through 257.98 that must be placed in the Annual Report. The following requirements include relevant and required information in the Annual Report for activities completed from July 2019 through June 2020.

2.3.5.1 40 CFR § 257.94(d)(3) – Demonstration for Alternative Detection Monitoring Frequency

The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration for an alternative groundwater sampling and analysis frequency meets the requirements of this section. The owner or operator must include the demonstration providing the basis for the alternative monitoring frequency and the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority in the annual groundwater monitoring and corrective action report required by § 257.90(e).

An alternative groundwater detection monitoring sampling and analysis frequency has not been established for this CCR unit; therefore, no demonstration or certification is applicable.

2.3.5.2 40 CFR § 257.94(e)(2) – Detection Monitoring Alternate Source Demonstration

The owner or operator may demonstrate that a source other than the CCR unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. The owner or operator must complete the written demonstration within 90 days of detecting a statistically significant increase over background levels to include obtaining a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority verifying the accuracy of the information in the report. If a successful demonstration is completed within the 90-day period, the owner or operator of the CCR unit may continue with a detection monitoring program under this section. If a successful demonstration is not completed within the 90-day period, the owner or operator of the CCR unit must initiate an assessment monitoring program as required under § 257.95. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

An ASD was not successfully completed for the March 2019 detection monitoring sampling event.

2.3.5.3 40 CFR § 257.95(c)(3) – Demonstration for Alternative Assessment Monitoring Frequency

The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration for an alternative groundwater sampling and analysis frequency meets the requirements of this section. The owner or operator must include the demonstration providing the basis for the alternative monitoring frequency and the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority in the annual groundwater monitoring and corrective action report required by § 257.90(e).

An alternative groundwater assessment monitoring sampling and analysis frequency has not been established for this CCR unit; therefore, no demonstration or certification is applicable.

2.3.5.4 40 CFR § 257.95(d)(3) – Assessment Monitoring Concentrations and Groundwater Protection Standards

Include the recorded concentrations required by paragraph (d)(1) of this section, identify the background concentrations established under § 257.94(b), and identify the groundwater protection standards established under paragraph (d)(2) of this section in the annual groundwater monitoring and corrective action report required by § 257.90(e).

Two rounds of assessment monitoring sampling were completed between July 2019 and June 2020. Analytical results for both downgradient and upgradient wells are provided in Table I. The background concentrations (upper tolerance limits) and groundwater protection standards established for detected Appendix IV constituents for the BAP are included in Table III. The background concentrations and groundwater protection standards provided in Table III will be utilized for the statistical evaluations completed for the March 2020 semi-annual assessment monitoring sampling event.

2.3.5.5 40 CFR § 257.95(g)(3)(ii) – Assessment Monitoring Alternate Source Demonstration

Demonstrate that a source other than the CCR unit caused the contamination, or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. Any such demonstration must be supported by a report that includes the factual or evidentiary basis for any conclusions and must be certified to be accurate by a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority. If a successful demonstration is made, the owner or operator must continue monitoring in accordance with the assessment monitoring program pursuant to this section, and may return to detection monitoring if the constituents in appendices III and IV to this part are at or below background as specified in paragraph (e) of this section. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

No assessment monitoring ASD or certification was required prior to July 2020.

2.3.5.6 40 CFR § 257.96(a) – *Demonstration for Additional Time for Assessment of Corrective Measures*

Within 90 days of finding that any constituent listed in appendix IV to this part has been detected at a statistically significant level exceeding the groundwater protection standard defined under § 257.95(h), or immediately upon detection of a release from a CCR unit, the owner or operator must initiate an assessment of corrective measures to prevent further releases, to remediate any releases and to restore affected area to original conditions. The assessment of corrective measures must be completed within 90 days, unless the owner or operator demonstrates the need for additional time to complete the assessment of corrective measures due to site-specific conditions or circumstances. The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority attesting that the demonstration is accurate. The 90-day deadline to complete the assessment of corrective measures may be extended for no longer than 60 days. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

No assessment of corrective measures was required to be initiated from July 2019 through June 2020; therefore, no demonstration or certification is applicable for this unit.

TABLES

TABLE I
SUMMARY OF ANALYTICAL RESULTS - DETECTION AND ASSESSMENT MONITORING
EVERGY KANSAS CENTRAL, INC.
JEFFREY ENERGY CENTER
BOTTOM ASH POND (INACTIVE)
ST. MARYS, KANSAS

Location	Upgradient			Downgradient										
	IBA-4			IBA-1			IBA-2				IBA-3			
Measure Point (TOC)	1201.86			1171.65			1171.66				1164.95			
Sample Name	IBA-4	IBA-04_120419	IBA-04-030420	IBA-1	IBA-01_120319	IBA-01-030320	IBA-2	IBA-02_120419	DUP_120419	IBA-02-030420	DUP-030420	IBA-3	IBA-03_120419	IBA-03-030420
Sample Date	9/10/2019	12/4/2019	3/4/2020	9/10/2019	12/3/2019	3/3/2020	9/10/2019	12/4/2019	12/4/2019	3/4/2020	3/4/2020	9/10/2019	12/4/2019	3/4/2020
Final Lab Report Date	9/20/2019	12/16/2019	3/16/2020	9/20/2019	12/16/2019	3/16/2020	9/20/2019	12/16/2019	12/16/2019	3/16/2020	3/16/2020	9/20/2019	12/16/2019	3/16/2020
Final Lab Report Revision Date	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Final Radiation Lab Report Date	N/A	1/2/2020	N/A	N/A	1/2/2020	N/A	N/A	1/2/2020	1/2/2020	N/A	N/A	N/A	1/2/2020	N/A
Final Radiation Lab Report Revision Date	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lab Data Reviewed and Accepted	10/22/2019	1/9/2020	4/20/2020	10/22/2019	1/9/2020	4/20/2020	10/22/2019	1/9/2020	1/9/2020	4/20/2020	4/20/2020	10/22/2019	1/9/2020	4/20/2020
Depth to Water (ft btoc)	52.41	53.34	53.61	24.61	26.12	25.38	26.09	27.72	--	27.16	--	30.28	31.63	31.22
Temperature (Deg C)	17.67	15.17	9.91	17.49	14.78	11.18	19.33	12.45	--	8.46	--	18.88	13.59	8.42
Conductivity (µS/cm)	888	952	941	2000	2197	2171	1615	1749	--	1767	--	1845	2035	2041
Turbidity (NTU)	2.16	1.62	1.07	3.78	2.10	1.25	0.26	0.86	--	0.77	--	0.27	0.98	0.62
Boron, Total (mg/L)	0.21	--	0.21	0.339	--	0.34	0.18	--	--	0.18	0.18	0.25	--	0.26
Calcium, Total (mg/L)	102	--	104	295	--	308	214	--	--	221	218	249	--	261
Chloride (mg/L)	18.4	--	18.1	119	--	125	122	--	--	109	106	128	--	116
Fluoride (mg/L)	0.55	0.48	0.48	<0.20	<0.20	0.21	<0.20	<0.20	<0.20	0.24	0.25	<0.20	<0.20	0.23
Sulfate (mg/L)	167	--	167	881	--	815	530	--	--	547	544	758	--	716
pH (su)	7.4	--	7.3	7.4	--	7.2	7.4	--	--	7.3	7.1	7.4	--	7.2
TDS (mg/L)	659	--	685	1710	--	1740	1350	--	--	1310	1360	1690	--	1630
Antimony, Total (mg/L)	--	<0.0010	--	--	<0.0010	--	--	<0.0010	<0.0010	--	--	--	<0.0010	--
Arsenic (mg/L)	--	<0.0010	--	--	<0.0010	--	--	<0.0010	<0.0010	--	--	--	<0.0010	--
Barium, Total (mg/L)	--	0.020	0.017	--	0.031	0.028	--	0.029	0.028	0.027	0.026	--	0.019	0.017
Beryllium, Total (mg/L)	--	<0.0010	--	--	<0.0010	--	--	<0.0010	<0.0010	--	--	--	<0.0010	--
Cadmium, Total (mg/L)	--	<0.00050	--	--	<0.00050	--	--	<0.00050	<0.00050	--	--	--	<0.00050	--
Chromium, Total (mg/L)	--	<0.0050	--	--	<0.0050	--	--	<0.0050	<0.0050	--	--	--	<0.0050	--
Cobalt, Total (mg/L)	--	<0.0010	<0.0010	--	0.0021	0.0021	--	0.0011	0.0011	0.0011	0.0011	--	0.0018	0.0019
Lead, Total (mg/L)	--	<0.010	--	--	<0.010	--	--	<0.010	<0.010	--	--	--	<0.010	-
Lithium, Total (mg/L)	--	0.035	0.031	--	0.015	0.014	--	0.017	0.026	0.018	0.019	--	0.022	0.020
Molybdenum, Total (mg/L)	--	0.0018	0.0019	--	0.0072	0.0076	--	0.0021	0.0020	0.0022	0.0022	--	0.0021	0.0022
Selenium, Total (mg/L)	--	<0.0010	--	--	<0.0010	--	--	<0.0010	<0.0010	--	--	--	<0.0010	--
Thallium, Total (mg/L)	--	<0.0010	--	--	<0.0010	--	--	<0.0010	<0.0010	--	--	--	<0.0010	--
Mercury, Total (mg/L)	--	<0.00020	--	--	<0.00020	--	--	<0.00020	<0.00020	--	--	--	<0.00020	--
Fluoride (mg/L)	--	0.48	0.48	--	<0.20	0.21	--	<0.20	<0.20	0.24	0.25	--	<0.20	0.23
Radium-226 & 228 Combined (pCi/L)	--	0.784 +/- 0.669 (1.11)	--	--	0.972 +/- 0.755 (1.23)	--	--	0.921 +/- 0.625 (0.967)	0.000 +/- 0.684 (1.19)	--	--	--	0.189 +/- 0.777 (1.56)	--

Notes & Abbreviations:
The September 2019 sampling event was for Appendix III constituents only. The March 2020 sampling event included Appendix IV constituents detected in the December 2019 sampling event, and all of the Appendix III constituents.
Radiological results are presented as activity plus or minus uncertainty with minimum detectable concentration (MDC).
Bold value: Detection above laboratory reporting limit or MDC.
µS/cm = micro Siemens per centimeter
ft btoc = feet below top of casing
Deg C = degrees Celsius
mg/L = milligrams per liter
N/A = Not Applicable
NTU = Nephelometric Turbidity Unit
pCi/L = picoCuries per liter
su = standard unit
TDS = total dissolved solids
TOC = top of casing

TABLE II
SUMMARY OF APPENDIX III SSIs
MARCH 2019 SAMPLING EVENT
JEFFREY ENERGY CENTER
BOTTOM ASH POND (INACTIVE)

Well ID	Statistical Analysis Completed	Constituent
IBA-1	July 2019	Boron
IBA-1	July 2019	Calcium
IBA-2	July 2019	
IBA-3	July 2019	
IBA-1	July 2019	Chloride
IBA-2	July 2019	
IBA-3	July 2019	
IBA-1	July 2019	Sulfate
IBA-2	July 2019	
IBA-3	July 2019	
IBA-1	July 2019	Total Dissolved Solids
IBA-2	July 2019	
IBA-3	July 2019	

Notes & Abbreviations:

SSIs = statistically significant increases

TABLE III

ANNUAL ASSESSMENT GROUNDWATER MONITORING - DETECTED APPENDIX IV GWPS

DECEMBER 2019 SAMPLING EVENT

JEFFREY ENERGY CENTER

BOTTOM ASH POND (INACTIVE)

Well #	Background Value (UTL)*	GWPS (Higher of MCL / 40 CFR § 257.95(h)(2) or Upper Tolerance Limit)
CCR Appendix-IV Barium, Total (mg/L)		
IBA-4 (upgradient)	0.0229	
IBA-1		2
IBA-2		2
IBA-3		2
CCR Appendix-IV Cobalt, Total (mg/L)		
IBA-4 (upgradient)	0.001	
IBA-1		0.006
IBA-2		0.006
IBA-3		0.006
CCR Appendix-IV Fluoride, Total (mg/L)		
IBA-4 (upgradient)	0.653	
IBA-1		4.0
IBA-2		4.0
IBA-3		4.0
CCR Appendix-IV Lithium, Total (mg/L)		
IBA-4 (upgradient)	0.0382	
IBA-1		0.040
IBA-2		0.040
IBA-3		0.040
CCR Appendix-IV Molybdenum, Total (mg/L)		
IBA-4 (upgradient)	0.0024	
IBA-1		0.100
IBA-2		0.100
IBA-3		0.100

Notes and Abbreviations:

* Background value for interwell evaluation based on data collected through March 2019

CCR = coal combustion residuals

GWPS = Groundwater Protection Standard

MCL = maximum contaminant level

mg/L = milligrams per Liter

NA = Not Applicable

pCi/L = picoCuries per Liter

RSL = Regional Screening Level

FIGURE



LEGEND

- BOTTOM ASH POND
- MONITORING WELL

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: ENVIRONMENTAL SYSTEMS RESEARCH INSTITUTE, MAY 7, 2018.



**HALEY
ALDRICH**

EVERGY KANSAS CENTRAL, INC. JEFFREY ENERGY
CENTER
ST. MARYS, KANSAS

**BOTTOM ASH POND (INACTIVE)
MONITORING WELL LOCATION
MAP**

JULY 2020

FIGURE 1