

2019 ANNUAL GROUNDWATER MONITORING  
AND CORRECTIVE ACTION REPORT  
FLY ASH LANDFILL  
JEFFREY ENERGY CENTER  
ST. MARYS, KANSAS

by Haley & Aldrich, Inc.  
Cleveland, Ohio

for Evergy Kansas Central, Inc. (f/k/a Westar Energy, Inc.)  
Topeka, Kansas

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Revision No.	Date	Notes
0	1/31/2020	Original

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**2019 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 Fly Ash Landfill (FAL) consistent with applicable sections of § 257.90 through 257.98, and describes activities conducted in the prior calendar year (2019) and documents compliance with the United States Environmental Protection Agency Coal Combustion Residual Rule. I certify that the 2019 Annual Groundwater Monitoring and Corrective Action Report for the FAL 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.





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

**1. Introduction**

This 2019 Annual Groundwater Monitoring and Corrective Action Report (Annual Report) addresses the Fly Ash Landfill (FAL) 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 United States Environmental Protection Agency 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). The Annual Report documents the groundwater monitoring system for the FAL consistent with applicable sections of § 257.90 through 257.98, and describes activities conducted in the prior calendar year (2019) and documents compliance with the Rule. The specific requirements for the Annual Report listed in § 257.90(e)(1)-(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) [Suspension of groundwater monitoring requirements] of this section.***

Evergy has installed and certified a groundwater monitoring system at the JEC FAL. The FAL 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).***

This Annual Report describes monitoring completed and actions taken for the groundwater monitoring system at the JEC FAL 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 in the calendar year 2019.

#### 2.2.1 Status of the Groundwater Monitoring Program

The FAL remained in the assessment monitoring program during 2019.

#### 2.2.2 Key Actions Completed

The 2018 Annual Groundwater Monitoring and Corrective Action Report was completed in January 2019. Statistical evaluation was completed in January 2019 on analytical data from the

## 2019 Annual Groundwater Monitoring and Corrective Action Report

September 2018 assessment monitoring sampling event. A successful alternate source demonstration (ASD) was completed and certified for the September 2018 sampling event.

A semi-annual assessment monitoring sampling event was completed in March 2019 for detected Appendix IV constituents identified from the June 2018 annual assessment monitoring sampling event. Statistical evaluation was completed in July 2019 on analytical data from the March 2019 assessment monitoring sampling event.

An annual assessment monitoring sampling event was completed in June 2019 to identify detected Appendix IV constituents for subsequent semi-annual sampling events in September 2019 and planned for March 2020. Groundwater protection standards for detected Appendix IV constituents were established or updated at that time. Semi-annual assessment monitoring sampling was completed in September 2019 for detected Appendix IV constituents identified during the June 2019 annual monitoring event. Statistical evaluation of the results from the September 2019 semi-annual assessment monitoring sampling event are due to be completed in January 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, and problems with analytical analysis) were encountered at the FAL in 2019.

### 2.2.4 Actions to Resolve Problems

No problems were encountered at the FAL in 2019, therefore, no actions to resolve problems were required.

### 2.2.5 Project Key Activities for Upcoming Year

Key activities planned for 2020 include the completion of the 2019 Annual Groundwater Monitoring and Corrective Action Report, statistical evaluation of semi-annual assessment monitoring analytical data collected in September 2019, 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)

***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 FAL 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 during 2019.

**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) and § 257.95(d)(1), three independent assessment monitoring samples from each background and downgradient monitoring well were collected in 2019. A summary including sample names, dates of sample collection, field parameters, and monitoring data obtained for the groundwater monitoring program for the FAL 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***

The assessment monitoring program was established in June 2018 to meet the requirements of 40 CFR § 257.95. The FAL remained in assessment monitoring during 2019.

**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 in calendar year 2019.

**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.***

This unit is in assessment monitoring; therefore, no detection monitoring alternative source demonstration or certification is applicable.

**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).***

An assessment monitoring program has been implemented at the CCR unit since June 2018. Three rounds of assessment monitoring sampling were completed in 2019. 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 FAL are included in Table II. The background concentrations and groundwater protection standards provided in Table II were utilized for the statistical evaluations completed in 2019 for September 2018 and March 2019 semi-annual assessment monitoring sampling events.

**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.***

A successful assessment monitoring ASD is included in this report as Attachment 1. The FAL remained in assessment monitoring during 2019.

**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***

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

***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 in 2019; therefore, no demonstration or certification is applicable for this unit.

## **TABLES**



**TABLE I**  
**SUMMARY OF ANALYTICAL RESULTS - ASSESSMENT MONITORING**

EVERGY KANSAS CENTRAL, INC.  
 JEFFREY ENERGY CENTER  
 FLY ASH LANDFILL  
 ST. MARYS, KANSAS

Location	Upgradient			Downgradient								
	MW-FAA-5			MW-FAA-3			MW-FAA-4			MW-FAA-6		
Measure Point (TOC)	1250.8			1165.66			1213.81			1162.76		
Sample Name	FAA-5-032619	FAA-5_062319	MW-FAA-5	FAA-3-032619	FAA-3_062319	MW-FAA-3	FAA-4-032619	FAA-4_062319	MW-FAA-4	FAA-6-032619	FAA-6_062319	MW-FAA-6
Sample Date	3/26/2019	6/23/2019	9/12/2019	3/26/2019	6/23/2019	9/12/2019	3/26/2019	6/23/2019	9/12/2019	3/26/2019	6/23/2019	9/12/2019
Final Lab Report Date	4/8/2019	7/5/2019	9/23/2019	4/8/2019	7/5/2019	9/23/2019	4/8/2019	7/5/2019	9/23/2019	4/8/2019	7/5/2019	9/23/2019
Final Lab Report Revision Date	N/A	N/A	10/22/2019	N/A	N/A	10/22/2019	N/A	N/A	10/22/2019	N/A	N/A	10/22/2019
Final Radiation Lab Report Date	4/8/2019	7/16/2019	10/8/2019	4/8/2019	7/16/2019	10/8/2019	4/8/2019	7/16/2019	10/8/2019	4/8/2019	7/16/2019	10/8/2019
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
Lab Data Reviewed and Accepted	4/15/2019	7/23/2019	10/22/2019	4/15/2019	7/23/2019	10/22/2019	4/15/2019	7/23/2019	10/22/2019	4/15/2019	7/23/2019	10/22/2019
Depth to Water (ft btoc)	86.78	85.66	85.96	12.79	10.95	11.58	55.32	53.39	53.96	14.70	12.70	13.66
Temperature (Deg C)	12.2	15.61	15.64	14.5	16.90	15.30	13.1	14.65	15.50	15.0	16.38	16.50
Conductivity (µS/cm)	2395	3500	2788	2488	1920	1551	1561	1430	1140	1593	3070	2641
Turbidity (NTU)	0.62	0.43	0.24	1.37	5.62	0.05	0.41	0.41	0.27	0.62	0.77	0.57
Boron, Total (mg/L)	1.1	--	1.5	0.54	--	0.93	0.88	--	0.62	1.5	--	3.5
Calcium, Total (mg/L)	294	--	313	366	--	204	180	--	154	147	--	121
Chloride (mg/L)	127	--	105	176	--	79.3	68.5	--	75.7	80.4	--	73.2
Fluoride (mg/L)	0.53	--	<0.20	0.37	--	<0.20	0.33	--	0.32	0.62	--	0.97
Sulfate (mg/L)	900	--	1560	1090	--	809	479	--	414	972	--	1720
pH (su)	7.1	--	7.1	7.2	--	7.4	7.3	--	7.3	7.4	--	7.7
TDS (mg/L)	1770	--	2840	1990	--	1570	1110	--	1090	1560	--	3100
Antimony, Total (mg/L)	<0.0010	<0.0010	--	<0.0010	<0.0010	--	<0.0010	<0.0010	--	<0.0010	<0.0010	--
Arsenic (mg/L)	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	0.0037	0.0043	0.0073
Barium, Total (mg/L)	<0.0050	0.0072	<0.0050	0.036	0.033	0.032	0.051	0.052	0.051	0.033	0.026	0.024
Beryllium, Total (mg/L)	<0.0010	<0.0010	--	<0.0010	<0.0010	--	<0.0010	<0.0010	--	<0.0010	<0.0010	--
Cadmium, Total (mg/L)	<0.00050	<0.00050	--	<0.00050	<0.00050	--	<0.00050	<0.00050	--	<0.00050	<0.00050	--
Chromium, Total (mg/L)	<0.0050	<0.0050	--	<0.0050	<0.0050	--	<0.0050	<0.0050	--	<0.0050	<0.0050	--
Cobalt, Total (mg/L)	0.0022	0.0056	0.0040	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	0.0017	0.0012	0.0015
Lead, Total (mg/L)	<0.010	<0.010	--	<0.010	<0.010	--	<0.010	<0.010	--	<0.010	<0.010	--
Lithium, Total (mg/L)	0.082	0.11	0.11	0.014	<0.010	0.015	0.019	0.017	0.020	0.014	<0.010	0.012
Molybdenum, Total (mg/L)	0.024	0.053	0.034	0.0039	0.011	0.013	0.0072	0.0065	0.0054	0.22	0.34	0.58
Selenium, Total (mg/L)	0.0027	0.0011	0.0033	<0.0010	<0.0010	<0.0010	0.0013	0.0019	0.0016	<0.0010	0.014	0.0013
Thallium, Total (mg/L)	<0.0010	<0.0010	--	<0.0010	<0.0010	--	<0.0010	<0.0010	--	<0.0010	<0.0010	--
Mercury, Total (mg/L)	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020	<0.00020
Fluoride (mg/L)	0.53	1.6	<0.20	0.37	0.43	<0.20	0.33	0.44	0.32	0.62	1.2	0.97
Radium-226 & 228 Combined (pCi/L)	1.00 +/- 0.975 (1.80)	2.43 +/- 1.12 (1.34)	0.794 +/- 0.854 (1.48)	0.352 +/- 0.782 (1.66)	0.453 +/- 0.790 (1.53)	0.857 +/- 0.932 (1.81)	1.40 +/- 1.18 (2.02)	1.54 +/- 0.959 (1.46)	0.335 +/- 0.858 (1.69)	1.43 +/- 1.12 (1.82)	1.43 +/- 0.932 (1.49)	0.136 +/- 0.750 (1.62)

**Note:**  
 The June 2019 sampling event was for Appendix IV constituents only. The September 2019 sampling event included Appendix IV constituents detected in the June 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

NTU = Nephelometric Turbidity Unit

pCi/L = picoCuries per liter

su = standard unit

TDS = total dissolved solids

TOC = top of casing

**TABLE II**  
**ANNUAL ASSESSMENT GROUNDWATER MONITORING - DETECTED APPENDIX IV GWPS**  
 JUNE 2019 SAMPLING EVENT  
 JEFFREY ENERGY CENTER  
 FLY ASH LANDFILL

Well #	Background Value*	GWPS
<b>CCR Appendix-IV Arsenic, Total (mg/L)</b>		
MW-FAA-5 (upgradient)	0.0037	NA
MW-FAA-3		0.010
MW-FAA-4		0.010
MW-FAA-6		0.010
<b>CCR Appendix-IV Barium, Total (mg/L)</b>		
MW-FAA-5 (upgradient)	0.0136	NA
MW-FAA-3		2
MW-FAA-4		2
MW-FAA-6		2
<b>CCR Appendix-IV Cobalt, Total (mg/L)</b>		
MW-FAA-5 (upgradient)	0.0036	NA
MW-FAA-3		0.006
MW-FAA-4		0.006
MW-FAA-6		0.006
<b>CCR Appendix-IV Fluoride, Total (mg/L)</b>		
MW-FAA-5 (upgradient)	1.261	NA
MW-FAA-3		4.0
MW-FAA-4		4.0
MW-FAA-6		4.0
<b>CCR Appendix-IV Lithium, Total (mg/L)</b>		
MW-FAA-5 (upgradient)	0.183	NA
MW-FAA-3		0.183
MW-FAA-4		0.183
MW-FAA-6		0.183
<b>CCR Appendix-IV Molybdenum, Total (mg/L)</b>		
MW-FAA-5 (upgradient)	0.0699	NA
MW-FAA-3		0.1
MW-FAA-4		0.1
MW-FAA-6		0.929**
<b>CCR Appendix-IV Radium-226 &amp; 228 Combined (pCi/L)</b>		
MW-FAA-5 (upgradient)	1.3	NA
MW-FAA-3		5
MW-FAA-4		5
MW-FAA-6		5
<b>CCR Appendix-IV Selenium, Total (mg/L)</b>		
MW-FAA-5 (upgradient)	0.0037	NA
MW-FAA-3		0.050
MW-FAA-4		0.050
MW-FAA-6		0.050

**Notes and Abbreviations:**

\* Background value for interwell evaluation based on data collected through June 2018.

\*\* GWPS based on background value using intrawell evaluation based on data collected through June 2018.

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**

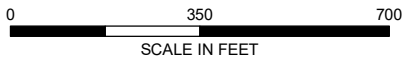


**LEGEND**

-  MONITORING WELL
-  PIEZOMETRIC OBSERVATION ONLY
-  FLY ASH LANDFILL LIMITS OF DISPOSAL AREA

**NOTES**

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



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

**FLY ASH LANDFILL  
MONITORING WELL LOCATION MAP**

JANUARY 2020

FIGURE 1

**ATTACHMENT 1**

**Appendix IV SSL Alternate Source Demonstration for Fly Ash Landfill Area I,  
September 2018 Sampling Event**

**REPORT ON**  
**APPENDIX IV STATISTICALLY SIGNIFICANT LEVEL**  
**ALTERNATE SOURCE DEMONSTRATION**  
**FOR THE FLY ASH LANDFILL AREA 1**  
**SEPTEMBER 2018 SAMPLING EVENT**  
**JEFFREY ENERGY CENTER**  
**ST. MARYS, KANSAS**

by Haley & Aldrich, Inc.  
Cleveland, Ohio

for Westar Energy, Inc.  
Topeka, Kansas

File No. 129778-023  
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B	Topographic Maps
C	Laboratory Reports
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# 1. Introduction

Haley & Aldrich, Inc. (Haley & Aldrich) was retained by Westar Energy Inc. (Westar) to perform an evaluation of groundwater quality at Area 1 of the Fly Ash Landfill (FAL; Site/Unit) at the Jeffrey Energy Center (JEC) located in St. Marys, Kansas. The evaluation was performed in support of the coal combustion residuals (CCR) Rule, specifically §257.95(g)(3)(ii), groundwater assessment monitoring program, to evaluate a statistically significant level (SSL) of molybdenum identified during the September 2018 assessment monitoring sampling event at monitoring well MW-FAA-6 which is installed down gradient of the FAL. This report provides an overview of the site conditions and investigation activities, the results of the investigation activities conducted as part of the evaluation, and an alternative source demonstration (ASD) for the Appendix IV constituent, molybdenum. This report does not address Area 2 of the FAL, which is under construction as of the date of this report.

## Summary & Conclusions

Based on the finding and evaluation of available information discussed in this report, it has been concluded that the SSL for molybdenum identified at MW-FAA-6 is due to the presence of interbedded shale and limestone deposits within the Grenola limestone, and geochemical conditions (pH) promoting the localized mobilization of molybdenum from that formation. Consequently, the alternate source of molybdenum at the FAL monitoring well MW-FAA-6 is natural groundwater quality variability associated with the presence of interbedded shale and limestone deposits within the Grenola limestone, and localized mobilization of molybdenum from that formation into groundwater.

## 1.1 BACKGROUND

Consistent with Code of Federal Regulations Title 40 (40 CFR) §257.90 through §257.95, Westar has installed and certified a groundwater monitoring network at the FAL, has completed detection monitoring program activities including identifying statistically significant increases in Appendix III constituent concentrations, and established an assessment monitoring program. Westar conducted statistical analyses of the down gradient groundwater quality results from the September 2018 assessment monitoring sampling event to determine if any Appendix IV constituents are present at concentrations that exceed groundwater protection standards set for the Unit. The analysis of the Appendix IV constituents resulted in a calculated SSL above the groundwater protection standard of 0.1 milligrams per liter (mg/L) for molybdenum down gradient of the FAL at monitoring well MW-FAA-6. The analyses described in this report were conducted to determine if alternate sources existed for the SSL.

Pursuant to 40 CFR §257.95(g)(3)(ii), “**...the owner or operator must...demonstrate that a source other than the CCR unit <sup>1</sup> caused the contamination, or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.**”

The CCR Rule provides 90 days from determination of an SSL to complete an ASD for applicable Appendix IV constituents <sup>2</sup>. If a successful ASD is completed and certified by a qualified professional engineer, the CCR unit may continue in assessment monitoring. If, however, an alternate source of the

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<sup>1</sup> Referred to in this document as an “alternate source,” and the demonstration for such is referred to as an ASD.

<sup>2</sup> For simplicity, this report utilizes the term ASD to account for any of the three possible explanations (allowed for in the CCR Rule) for why a calculated SSL is not related to the CCR unit being evaluated. Those include: 1) The source for the SSL originates from something other than the CCR unit in question; 2) the SSL resulted from an error in sampling, analysis, or statistical evaluation; or 3) the SSL resulted from a natural variation in groundwater quality.

Appendix IV SSL is not identified, the owner or operator must initiate an assessment of corrective measures and nature and extent evaluation. This report documents the findings and conclusions of an investigation of the molybdenum SSL at MW-FAA-6.

## **1.2 PURPOSE AND SCOPE**

The purpose of this ASD is to determine whether the concentrations of molybdenum detected in groundwater at MW-FAA-6 are from sources other than the Unit. The scope of the demonstration includes a review of the current regional geochemical and geologic conditions, a comparison of the groundwater quality at MW-FAA-6 and the other monitoring well locations, and analysis of the bedrock matrix for sources of molybdenum. This evaluation was completed using existing information describing the regional and site-specific geology and groundwater monitoring data collected during detection and assessment monitoring activities. This analysis included:

- Review of well installation logs for the presence of shale and limestone in the groundwater monitoring well screened intervals;
- Review of low flow groundwater sampling field forms including specific conductance, turbidity, and pH measurements; and
- Collection and analysis of representative bedrock samples obtained during the installation of groundwater monitoring wells up gradient and down gradient of the unit.

## **1.3 SITE SETTING**

The JEC is located approximately 7 miles northwest of St. Marys in Pottawatomie County, Kansas. The location of the JEC is shown on Figure 1. The Site is located within the Central Lowland physiographic province which includes rolling hills with substantial topographic relief and the relatively horizontal orientation of the thin alternating shale and limestone beds. The FAL is a CCR landfill that encompasses approximately 55 acres and is located approximately 1 mile west of the JEC plant site. The JEC plant site and the FAL are relatively flat; however, the area between the JEC plant and the FAL consists of rolling hills and natural drainages with natural ground surface elevations varying between 1,100 and 1,300 feet above mean sea level (amsl).

## **1.4 SITE DESCRIPTION**

The FAL CCR management unit was permitted as a combined Industrial Waste Landfill in 1980 under the Kansas Department of Health and Environment (KDHE) Solid Waste Disposal Area Operating Permit No. 359 (KDHE Permit No. 359). Fly ash is collected at the JEC power plant via an electrostatic precipitator and is conveyed by truck to the FAL where it is deposited behind an embankment in the FAL, graded, hydrated to support grading and dust suppression, and disposed in Area 1 of the FAL. The FAL and associated groundwater monitoring well network is shown on Figure 2.

## 2. Site Geology, Hydrogeology, Geochemistry, and Regional Conditions

Geologic and hydrogeologic conditions beneath the FAL have been characterized based on information obtained during installation and sampling of the monitoring wells installed pursuant to the Solid Waste Disposal Area Operating Permit (KDHE Permit No. 359) and wells installed for the CCR groundwater monitoring network.

### 2.1 SITE GEOLOGY

The JEC site and the FAL are located within the southern extent of Pleistocene glacial activity in the Dissected till plains region of the Central Lowlands geomorphic province. The Site is underlain by multiple sequences of marine sedimentary rocks (interbedded shales and limestones) that are roughly horizontal. The principal hydrogeologic units that underlie the FAL, in order of increasing depth, include the Stearns shale, Beattie limestone, Eskridge shale, Grenola limestone, Roca shale, Red Eagle limestone, Johnson shale, and Foraker limestone formations. The fundamental properties of these formations are described below. Figure 3 shows the stratigraphic units located beneath the JEC site encountered during the installation of the FAL CCR monitoring well network.

Surficial geologic materials in the vicinity of and beneath the FAL include thin deposits of Pleistocene glacial till and Holocene alluvium. The natural surficial materials prior to construction of the FAL include the poorly sorted glacial deposits composed of Kansan and Nebraskan age clays, silts, and sands. Locally, the till may yield minor quantities of water, but occurrence of water is discontinuous, and the Unit does not constitute an aquifer.

The Pleistocene glacial deposits are underlain by strata representing transgressions and regressions of marine and near-shore depositional environments. The shale units represent deposition of fine grain silt and clay materials in an off-shore marine environment. The silt and clay were later buried at depth and compressed to form the relatively hard and impermeable shale observed underlying the FAL. The limestone units represent deposition of chemically precipitated calcium carbonate in an environment further from shore in comparison with the shale depositional environment. After deposition, the chemically precipitated calcium carbonate was also buried at depth and compressed to form the limestone units observed underlying the FAL. The alternating sequences of shale and limestone were created by sequential rising and falling of the relative sea level which caused the shale and limestone depositional environments to repeatedly transgress and regress over one another.

The alternating shale and limestone units range in thickness between approximately 8 and 42 feet. The limestone units are generally water-bearing and the shale units generally are not. The nearly horizontal shale units have formed barriers to vertical groundwater flow. The Stearns shale, the Beattie limestone, and the Eskridge shale are unsaturated beneath the FAL and overlie the principle hydrogeologic units consisting of the Grenola limestone and the Roca shale.

### 2.2 SITE HYDROGEOLOGY AND HYDROLOGY

Given the alternating sequences of shale and limestone, many of the water-bearing units are confined and preclude the vertical migration of groundwater. The limestone formations have variable permeability but are generally characterized as low permeability but have higher permeability than the shale units. Shale permeability decreases with depth and while the upper shale units beneath the CCR

management units have a low permeability, the deeper shale units are considered relatively impermeable.

The uppermost water-bearing geologic formation at the FAL is the Grenola limestone. Based on observations made by Haley & Aldrich during drilling conducted at the FAL in March 2016 and June 2017, the saturated thickness of the Grenola formation is approximately 12 to 42 feet below ground surface (bgs). The saturated Grenola limestone is underlain by the low permeability Roca shale which acts as an aquitard, inhibiting downward groundwater flow. The uppermost aquifer does not appear to be hydraulically interconnected with the underlying aquifers within the JEC facility boundary.

Based on groundwater elevation data collected as part of the detection and assessment monitoring programs, the groundwater flow direction has been consistently observed toward the south. Available groundwater elevation data indicate that seasonal groundwater elevation variation does not have a significant effect on groundwater flow direction at the JEC site.

Based on slug test results conducted by Haley & Aldrich and others, the hydraulic conductivity of the Grenola limestone at FAL was calculated to range between  $3.97 \times 10^{-3}$  and  $2.33 \times 10^{-3}$  centimeters per second (cm/sec). The Roca shale underlying the uppermost aquifer at FAL is between 7 to 34 feet thick, and results of packer tests conducted during previous studies indicate that the hydraulic conductivity is  $3.55 \times 10^{-5}$  cm/sec (Burns & McDonnell, 2009). Based on these observations, the Roca shale is characterized as an aquitard beneath the Grenola limestone at the FAL.

During installation of the groundwater monitoring well network at the FAL, discontinuous thin layers of black shale were observed interbedded with limestone within the bedrock formation. Black shale was observed interbedded within the water-bearing Grenola limestone in wells at the FAL.

### **2.3 NATURALLY-OCCURRING SOURCES OF MOLYBDENUM**

Black shale deposits identified in the region have been documented to contain elevated molybdenum content and typically occur in thin layers generally less than 3 feet thick. The shale layers with elevated molybdenum are believed to have been formed near ancient deltaic shorelines enriched in terrestrial organic matter and can be associated with coal seams. These types of shale deposits have been identified from Indiana to Oklahoma and from Kentucky to Iowa. In general, the further from the boundary of the ancient shoreline, the lower the molybdenum concentration observed in the shale (Coveney and Glascock, 1989).

The dissolution and mobility of molybdenum is affected by the oxidation conditions in the water-bearing unit, the presence of adsorption sites within the soil and bedrock matrix, and groundwater pH conditions. Generally, molybdenum adsorption to soils and bedrock matrices is lower under anaerobic groundwater conditions (dissolved oxygen less than 0.5 mg/L) and at neutral to basic pH (6 to 8 standard units [S.U.]). These groundwater conditions induce the dissolution of molybdenum adsorbed to iron oxide minerals (Smedley and Kinniburgh, 2012) and inhibit the adsorption of molybdenum to the soil matrix due to competition with the elevated hydroxide concentrations (Barrow, 1977), thus, increasing dissolved phase concentrations in groundwater.

### **3. Alternative Source Demonstration**

Haley & Aldrich conducted an evaluation of molybdenum concentration detected at MW-FAA-6 that included review of the three possible alternative sources (allowed for in the CCR Rule) for the apparent SSL determined by statistical analyses completed in January 2019 for the September 2018 assessment monitoring sampling event. The molybdenum concentration observed for the September 2018 assessment monitoring sampling event is 0.416 mg/L.

These possible alternative sources include:

1. The SSL resulted from an error in sampling, analysis, or statistical evaluation;
2. The source for the SSL originates from something other than the CCR unit in question; or
3. The SSL resulted from a natural variation in groundwater quality.

As part of that evaluation, Haley & Aldrich evaluated potential point and non-point sources of molybdenum in the vicinity of the FAL and evaluated natural geologic conditions and the effect of those conditions on native groundwater chemistry. Each of these analyses and the resulting findings are described below.

#### **3.1 REVIEW OF FIELD SAMPLING, LABORATORY ANALYSIS, AND STATISTICAL PROCEDURES**

##### **3.1.1 Field Sampling Procedures**

Westar conducted field sampling activities in accordance with the Groundwater Sampling and Analysis Plan (SAP; Haley & Aldrich, 2017) that was prepared in accordance with §257.93 of the CCR Rule. The SAP prescribes the site-specific activities and methods for groundwater sampling and included procedures for field data collection, sample collection, sample preservation and shipment, interpretation, laboratory analytical methods, and reporting for groundwater sampling for the FAL. The administrative procedures and frequency for collection of groundwater elevation measurements, determination of flow directions, and gradients were also provided in the SAP.

Haley & Aldrich reviewed the field sampling and equipment calibration logs and the field indicator parameters and did not identify any apparent deviations or errors in sampling that would result in a potential SSL down gradient of the FAL.

##### **3.1.2 Laboratory Analysis and Quality Control Documentation**

The groundwater samples collected down gradient of the FAL were analyzed by Pace Analytical Services (Pace) using promulgated U.S. Environmental Protection Agency (USEPA) analytical methods in accordance with the SAP (Haley & Aldrich, 2017) that was prepared in accordance with §257.93 of the CCR Rule. The data generated from these laboratory analyses are stored in a project database that incorporates hydrogeologic and groundwater quality data and was established to allow efficient management of chemical and physical data collected in the field and produced in the laboratory.

Haley & Aldrich conducted a quality assurance/quality control review of each groundwater quality dataset generated for the FAL and has not identified any apparent errors that would result in a potential SSL down gradient of the FAL.

### **3.1.3 Statistical Evaluation**

Westar collected the initial assessment monitoring groundwater sample in June 2018, and a second assessment monitoring groundwater sample in September 2018, from each of the up gradient (MW-FAA-5) and down gradient (MW-FAA-3, MW-FAA-4, and MW-FAA-6) monitoring wells at the FAL. Baseline sampling was previously completed over a period spanning from August 2016 through June 2017, as required by the CCR Rule. Statistical analysis of the analytical results was completed and reported as documented in the 2018 Annual Groundwater Monitoring and Corrective Action Report (Haley & Aldrich, 2019).

Haley & Aldrich has reviewed the statistical analysis of groundwater quality data from monitoring wells at the FAL and has not identified any laboratory or statistical calculation errors that would result in the apparent molybdenum SSL at MW-FAA-6. The statistical test method used met the performance standard established in the CCR Rule, and the statistical procedure complies with the requirements of the CCR Rule.

## **3.2 POTENTIAL SOURCES OTHER THAN THE FAL**

Haley & Aldrich conducted a review of potential sources (both point and non-point) of molybdenum in the vicinity of the FAL to determine if previous or adjacent site activities, land uses, or practices might have caused, or are currently causing, elevated concentrations of molybdenum in groundwater down gradient of the FAL. Potential point sources would include discharging activities or other activities occurring at a discrete location that may be a source of molybdenum. Non-point sources would include diffuse discharging activities or practices that may result in a low level but wide-spread increase in molybdenum concentrations detected at the down gradient side of the FAL.

### **3.2.1 Point Sources**

Prior to construction of the FAL, the landfill site and surrounding vicinity was undeveloped land. Review of historical United States Geological Survey (USGS) topographic maps shows undeveloped land prior to the construction of the FAL. No known industrial, agricultural, mining, or other activities were conducted at the FAL site prior to construction of the landfill that would potentially constitute a point source for molybdenum. No point sources have been identified as a potential alternative source for molybdenum at the FAL.

### **3.2.2 Non-Point Sources**

No mining, industrial, or other activities have been documented in the vicinity of the FAL that might constitute a non-point source of molybdenum in the vicinity of MW-FAA-6. Agricultural land use was observed approximately 0.8 mile to the southwest and down gradient of the FAL.

No agricultural activities have been identified up gradient of the FAL. Records reviewed included historical aerial photographs and historical topographic maps. No non-point sources have been identified as a potential alternative source for molybdenum at the FAL.

### **3.3 HISTORICAL LAND USE REVIEW**

Haley & Aldrich assessed past usage of the Site and adjoining properties through a review of the following records:

- Environmental Risk Information Services (ERIS) – Aerial Photographs, dated 1950, 1954, 1977, 1981, 1991, 2002, 2003, 2004, 2005, 2006, 2008, 2010, 2012, 2014, 2015, and 2017 (Appendix A); and
- ERIS – Topographic Maps, dated 1964, 1978, and 2012 (Appendix B).

Unless otherwise noted below, sources were reviewed dating back to 1940 or first developed use, whichever is earlier, and at 5-year intervals if the use of the property had changed within the time period.

#### **3.3.1 Historical Aerial Photographs**

Haley & Aldrich reviewed aerial photographs depicting the development of the Site and vicinity as summarized in Table I. The historical aerial photograph search includes photographs from the Army Mapping Service, USGS, National High-Altitude Photography, and the National Agriculture Information Program (ERIS, 2018) and are included in Appendix A.

Photographs show that the Site was undeveloped up until at least 1977. By 1981, the FAL embankment was constructed and the landfill had begun accepting fly ash up gradient of the current location of MW-FAA-6. Aerial photos from 1981 through 2017 show the progression of fill at the FAL. An historical aerial photograph review summary is included as Table I. No activities constituting potential sources of molybdenum have been identified based on aerial photograph review.

#### **3.3.2 Historical Topographic Maps**

Haley & Aldrich reviewed historical topographic maps depicting the development of the site and vicinity, as summarized in Table II. The topographic maps were provided for review by ERIS. Copies of the topographic maps are included in Appendix B. No historical development of other features constituting potential sources of molybdenum have been identified based on topographic map review.

### **3.4 NATURAL VARIABILITY OF MOLYBDENUM OCCURENCE**

Haley & Aldrich conducted an evaluation of the natural variability of molybdenum occurrence in formation material and groundwater at the FAL based on site-specific data; the analyses and observations are described in the following sections.

#### **3.4.1 Natural Bedrock Variability**

As described above, published information indicates that on a regional scale black shale is known to contain elevated levels of molybdenum. Based on this fact and the observed occurrence of black shales at the FAL, samples of shale deposits encountered during the installation of monitoring wells at the FAL lateral expansion were collected for laboratory analysis of molybdenum concentrations. Seven shale samples were submitted under a chain of custody (COC) to Pace laboratory in Lenexa, Kansas for the analysis of total molybdenum in accordance with USEPA Test Method 6020 and leachable molybdenum using USEPA Method 1312 Synthetic Precipitation Leaching Procedure (SPLP) extraction fluids and deionized (DI) water.



The results of total molybdenum analysis ranged from less than the laboratory reporting limit of 3.9 milligrams per kilogram (mg/kg) to 13.6 mg/kg. Concentrations of leachable molybdenum produced through SPLP ranged from 0.0024 to 0.25 mg/L. Concentrations of leachable molybdenum produced through DI leach ranged from 0.003 to 0.225 mg/L. These data confirm that the shale deposits at the JEC site exhibit a range of molybdenum concentrations that are leachable within the same concentration range as observed at MW-FAA-6. A summary of the shale deposit sample analyses and the SPLP and DI leachate are provided in Table III attached to this report, and a copy of the laboratory report with the completed COC are provided in Appendix C.

### 3.4.2 Natural Groundwater Quality Variability

Field parameter values collected during the collection of representative assessment monitoring groundwater samples using low-flow, low stress techniques in June and September 2018 indicate that the current groundwater conditions at MW-FAA-6 are basic with pH ranging from 7.98 to 8.59 S.U. Field pH measurements at the other monitoring wells during the assessment monitoring program generally range from 1 to 2 pH S.U. lower than MW-FAA-6. All of the FAL monitoring wells have been constructed with screened intervals in the Grenola limestone, which include alternating layers of limestone and shale. The higher pH observed at MW-FAA-6 is consistent with a well screened in limestone. The difference in pH between the FAL monitoring wells illustrates a degree of geochemical variability within that formation. The lithologic log for MW-FAA-6 indicates thin alternating layers of shale and limestone. The elevated pH conditions observed at MW-FAA-6 would induce a higher dissolution of molybdenum from the shale deposits within the groundwater monitoring interval. Groundwater parameters collected at the FAL groundwater monitoring network during the June and September 2018 assessment monitoring sampling events are provided in Table IV.

Molybdenum has also been detected in an up gradient monitoring well (MW-FGD-6) completed in the Grenola limestone at a separate JEC CCR unit at a concentration similar to that observed at MW-FAA-6. The molybdenum concentration at MW-FGD-6 is 0.52 mg/L, which is higher than the molybdenum concentrations of 0.33 and 0.416 mg/L observed in MW-FAA-6 during both the June and September 2018 assessment monitoring events, respectively. Monitoring well FGD-6 is constructed in the Grenola limestone in an area that is unimpacted by CCR material and where no recorded historical development has taken place.

These data indicate that sufficient natural geochemical variability exists within the Grenola limestone to locally mobilize molybdenum where present in the formation. This variability has resulted in concentrations of molybdenum in areas unimpacted by CCR material that range higher than those concentrations observed at MW-FAA-6.

Well construction details for the FAL monitoring wells (MW-FAA-3, MW-FAA-4, MW-FAA-5, and MW-FAA-6) are provided in Appendix D.



## 4. Findings and Conclusions

Haley & Aldrich conducted a geochemical evaluation of groundwater quality information and site geology to identify potential alternative sources of the elevated molybdenum concentrations detected down gradient of the FAL in groundwater samples collected from MW-FAA-6. The geochemical evaluation included review of oxidation conditions in the uppermost aquifer, groundwater quality observed at the FAL and elsewhere, and geochemical composition of formation materials. These data were evaluated in conjunction with published information regarding the occurrence of molybdenum in black shales on a regional scale to identify naturally occurring sources of molybdenum that might affect groundwater at MW-FAA-6.

The evaluation included review of sampling procedures, laboratory procedures, and statistical analyses to determine if potential errors may have been made that would have resulted in the false identification of an SSL for molybdenum at this monitoring well location. The evaluation also included consideration of historical site activities based on aerial photograph and historical topographic map review, and consideration of potential point and non-point sources of molybdenum based on those activities.

### 4.1 FINDINGS

Haley & Aldrich found no apparent errors in sampling, laboratory analysis, data management, or statistical analysis that would result in the apparent SSL for molybdenum at MW-FAA-6. Haley & Aldrich also found no evidence of historical point or non-point sources of molybdenum, or historical activities that might have concentrated molybdenum in the vicinity of the FAL.

Haley & Aldrich evaluated field data and information to better understand the potential for natural variability of groundwater quality in the uppermost aquifer beneath the FAL. Key findings regarding the depositional characteristics of the bedrock formation and the associated natural variability of groundwater quality in the uppermost aquifer include:

- The uppermost water-bearing unit beneath the FAL is located within an interbedded sequence of shale and limestone bedrock.
- The monitoring well screen installed at down gradient well location MW-FAA-6 transects layers of shale and limestone deposits within the Grenola limestone formation.
- The pH measured during the assessment monitoring program indicates that the groundwater conditions at MW-FAA-6 could promote the dissolution of molybdenum from the bedrock formation.
- Samples of shale deposits collected during the installation of new monitoring wells located up gradient from the FAL exhibited elevated concentrations of total and leachable molybdenum.
- Leachate created from the shale samples collected up and down gradient from the FAL and analyzed using USEPA Test Method 1312 SPLP and laboratory pure DI exhibited similar concentrations of dissolved molybdenum as identified at MW-FAA-6.
- Another monitoring well (FGD-6) located up gradient of another CCR unit at the JEC in an area known to be unimpacted by CCR material has exhibited molybdenum concentrations higher than molybdenum concentrations observed in MW-FAA-6.

## 4.2 CONCLUSIONS

Based on these findings, the SSL for molybdenum identified at MW-FAA-6 is due to the presence of interbedded shale and limestone deposits within the Grenola limestone, and geochemical conditions (pH) promoting the localized mobilization of molybdenum from that formation. Consequently, the alternate source of molybdenum at the FAL monitoring well MW-FAA-6 is natural groundwater quality variability associated with the presence of interbedded shale and limestone deposits within the Grenola limestone, and localized mobilization of molybdenum from that formation into groundwater.

## 5. Certification

This statement certifies that the demonstration 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 is complete in accordance with 40 CFR 257.95(g)(3)(ii). The certification submitted is, to the best of my knowledge, accurate and complete.

Signed: 

Print Name: Steven F. Putrich, P.E.  
Kansas PE License No.: 24363  
Title: Principal Consultant  
Company: Haley & Aldrich, Inc.



Steve Putrich  
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by Steve Putrich  
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Signed: 

Print Name: Mark D. Nicholls, P.G.  
Kansas PG License No.: 881  
Title: Lead Hydrogeologist  
Company: Haley & Aldrich, Inc.



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08:27:23 -07'00'

## 6. References

1. Coveney, Raymond and Glascock M., 1989. A review of the origins of metal-rich Pennsylvania black shales, central U.S.A., with an inferred role for basinal brines, *Journal of Applied Geochemistry*, Vol. 4, pp 347-367.
2. Barrow, N.J., 1977. Factors Affecting Molybdenum Status in Soils, Volume 2. The Geochemistry, Cycling and Industrial Uses of Molybdenum, proceedings from the International Symposium on Molybdenum in the Environment, Denver, CO.
3. Burns & McDonnell, 2009. *Final Phase II Hydrogeologic Investigation and Bottom Ash Pond Characterization*. January 2008 (Revised August 2009).
4. Environmental Risk Information Services, 2018. Database Report, March.
5. Haley & Aldrich, 2017. *Groundwater Sampling and Analysis Plan, Jeffrey Energy Center*. October.
6. Haley & Aldrich, 2019. *2018 Annual Groundwater Monitoring and Corrective Action Report, Fly Ash Landfill, Jeffrey Energy Center*. January.
7. Smedley, Pauline and Kinniburgh, D., 2012. *Molybdenum in natural waters: A review of occurrence, distributions and controls*, *Journal of Applied Geochemistry*, January 2017, pp 389-425.
8. United States Geological Survey (USGS), 1964. Topographic Map, Laclede, 7.5-minute series.
9. USGS, 1978. Topographic Map, Laclede, 7.5-minute series.
10. USGS, 2012. Topographic Map, Laclede, 7.5-minute series.

## **TABLES**

**TABLE I**  
**HISTORICAL AERIAL PHOTOGRAPH REVIEW SUMMARY**  
 WESTAR ENERGY, INC.  
 FLY ASH LANDFILL, JEFFREY ENERGY CENTER  
 ST. MARYS, KANSAS

Dates	Description of Site and Adjacent Properties	Sources
1950 – 1954	Undeveloped; some road use in the vicinity of the Site. Agricultural land use southwest of the Fly Ash Landfill.	Aerial photos – AMS
1977	Development of the plant site and road development south of the Fly Ash Area 1 Landfill. Agricultural land use southwest of the Fly Ash Landfill.	Aerial photos – USGS
1981	First appearance of Tower Hill Lake and Fly Ash Landfill. Agricultural land use southwest of the Fly Ash Landfill.	Aerial photos – NHAP
1991 – 2017	Growth of Fly Ash Landfill. Agricultural land use southwest of the Fly Ash Landfill.	Aerial photos – USGS; NAIP

**Notes:**

*AMS = American Meteorological Society*

*NAIP = National Agriculture Imagery Program*

*NHAP = National High Altitude Photography*

*USGS = U.S. Geological Survey*

**TABLE II**  
**HISTORICAL TOPOGRAPHIC MAP REVIEW SUMMARY**  
 WESTAR ENERGY, INC.  
 FLY ASH LANDFILL, JEFFREY ENERGY CENTER  
 ST. MARYS, KANSAS

Dates	Description of Site and Adjacent Properties	Map Name
1964	The map shows undeveloped rolling hills incised by natural drainages. One road and one trail are shown within the Site vicinity.	7.5-Minute Series, Laclede, Kansas Quadrangle
1978	Several roads leading to areas depicted as “Dam Under Construction” are shown on the map. The plant site is depicted as Power Plant and Substation. However, the Fly Ash Landfill does not appear on this map.	7.5-Minute Series, Laclede, Kansas Quadrangle
2012	Tower Hill Road and other un-named roads lead to the two reservoirs. The plant site and Fly Ash Landfill are not depicted on the map.	7.5-Minute Series, Laclede, Kansas Quadrangle

**TABLE III**  
**SUMMARY OF SHALE SAMPLE ANALYSIS FOR TOTAL METALS AND SPLP RESULTS**  
 WESTAR ENERGY, INC.  
 FLY ASH LANDFILL, JEFFREY ENERGY CENTER  
 ST. MARYS, KANSAS

Field Sample Name	MW-FAA-7 117.5-120	MW-FAA-7 102-104	MW-FAA-8 31.5-34	MW-FAA-9 24-25	MW-FAA-10 28-29.5	MW-FAA-11 78.5-79	MW-FAA-11 61-61.5
Location	MW-B-1		MW-FAA-7	MW-FAA-8	MW-FAA-9	MW-FAA-10	
Total Molybdenum <sup>1</sup> (mg/kg)	<3.9	9.4	8.3	13.6	11.0	<3.9	8.8
SPLP Molybdenum (mg/L)	0.0024	0.24	0.061	0.067	0.038	0.016	0.25
DI Leach Molybdenum (mg/L)	0.003	0.15	0.0547	0.0583	0.0309	0.0119	0.225

**Notes:**

*All samples analyzed by Pace Analytical Services, Lenexa KS*

*Total Metals determined using U.S. Environmental Protection Agency (USEPA) Method 200.8*

*DI = Deionized Water*

*mg/kg = milligrams per kilogram dry weight;*

*mg/L = milligrams per liter*



**TABLE IV  
SUMMARY OF FIELD PARAMETER MONITORING FROM THE INITIAL  
ASSESSMENT MONITORING SAMPLING EVENT**

WESTAR ENERGY, INC.  
FLY ASH LANDFILL, JEFFREY ENERGY CENTER  
ST. MARYS, KANSAS

Location	Sample Name	Sample Date	Event	Depth to Water (btoc)	Groundwater Elevation (ft amsl)	Field Parameters			
						Temperature (Deg C)	Conductivity (µS/cm)	Turbidity (NTU)	pH (su)
MW-FAA-5	FAA-5-0650518	6/5/2018	June 2018	87.15	1163.65	17.8	3340	0.21	6.91
MW-FAA-3	FAA-3-060518	6/6/2018	June 2018	14.38	1151.28	16.9	1630	2.24	7.17
MW-FAA-4	FAA-4-060518	6/5/2018	June 2018	58.71	1155.10	16.9	1360	0.05	7.23
MW-FAA-6	FAA-6-060518	6/6/2018	June 2018	14.90	1147.86	17.7	2780	1.51	8.57
	FAA-6-091318	9/13/2018	Sept 2018	14.94	1147.82	18.5	3170	0.44	8.27

**Notes:**

USEPA, 2016. Final Rule: Disposal of Coal Combustion Residuals from Electric Utilities. July 26. 40 CFR Part 257. <https://www.epa.gov/coalash/coal-ash-rule>

µS/cm = microSiemen per centimeter

btoc - below top of casing

Deg C = degrees Celsius

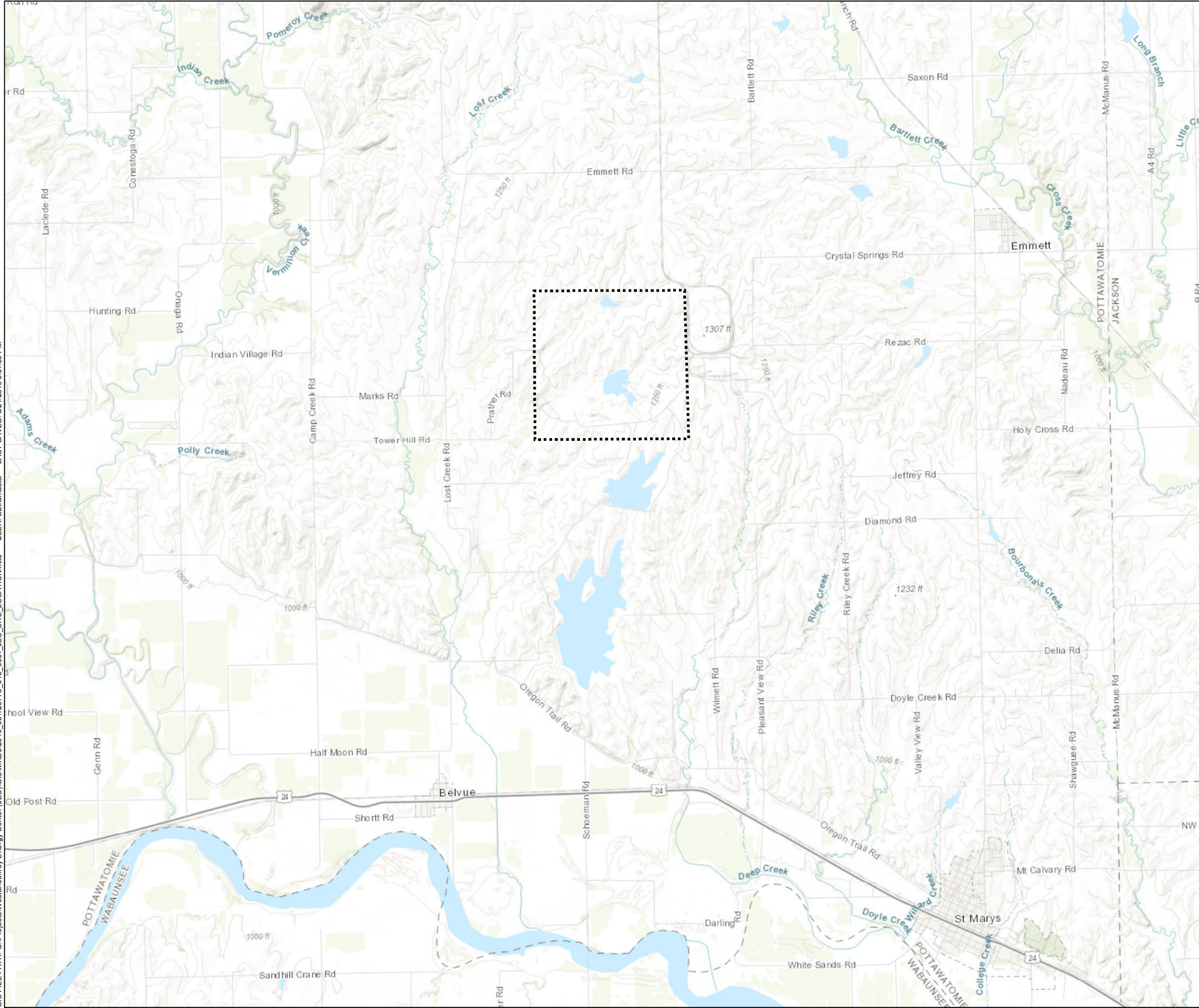
ft amsl = feet above mean sea level

NTU = Nephelometric Turbidity Units

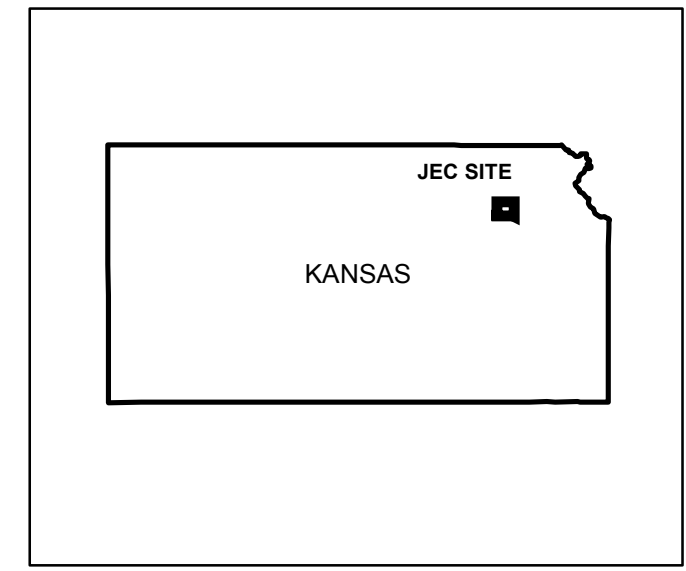
su = standard units

## FIGURES

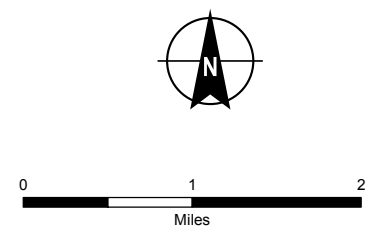
GIS FILE PATH: G:\Projects\Weststar\Jeffrey Energy Center (JEC)\GIS\MXDs\2019\_03\129778\_018\_0001\_JEC\_SITE\_LOCATION.mxd — USER: DZ\msmaster — LAST SAVED: 3/21/2019 5:31:59 PM



**LEGEND**  
[Dashed Box] FACILITY



- NOTES**
- 1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
  - 2. SITE COORDINATES: 39°17'06"N, 96°08'19"W
  - 3. TOPOGRAPHIC IMAGERY SOURCE: ESRI



**HALEY ALDRICH** WESTAR ENERGY  
JEFFREY ENERGY CENTER  
ST. MARYS, KANSAS

**SITE LOCATION**

MARCH 2019  
SCALE: AS SHOWN

**FIGURE 1**







DRAFT

GIS FILE PATH: \\haleyaldrich.com\share\pfx\_common\Projects\Westar\Jeffrey Energy Center (JEC)\GIS\MXDs\2019\_03\JEC\_FLYASH\_AREA1.MW\_LOCATION\_MAP\_REV2.mxd — USER: anichols — LAST SAVED: 3/21/2019 4:58:53 PM



**LEGEND**

-  MONITORING WELL
-  PIEZOMETRIC OBSERVATION ONLY
-  FLY ASH LANDFILL LIMITS OF DISPOSAL AREA
-  CROSS-SECTION

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: ESRI



**HALEY ALDRICH** WESTAR ENERGY  
JEFFREY ENERGY CENTER  
ST. MARYS, KANSAS

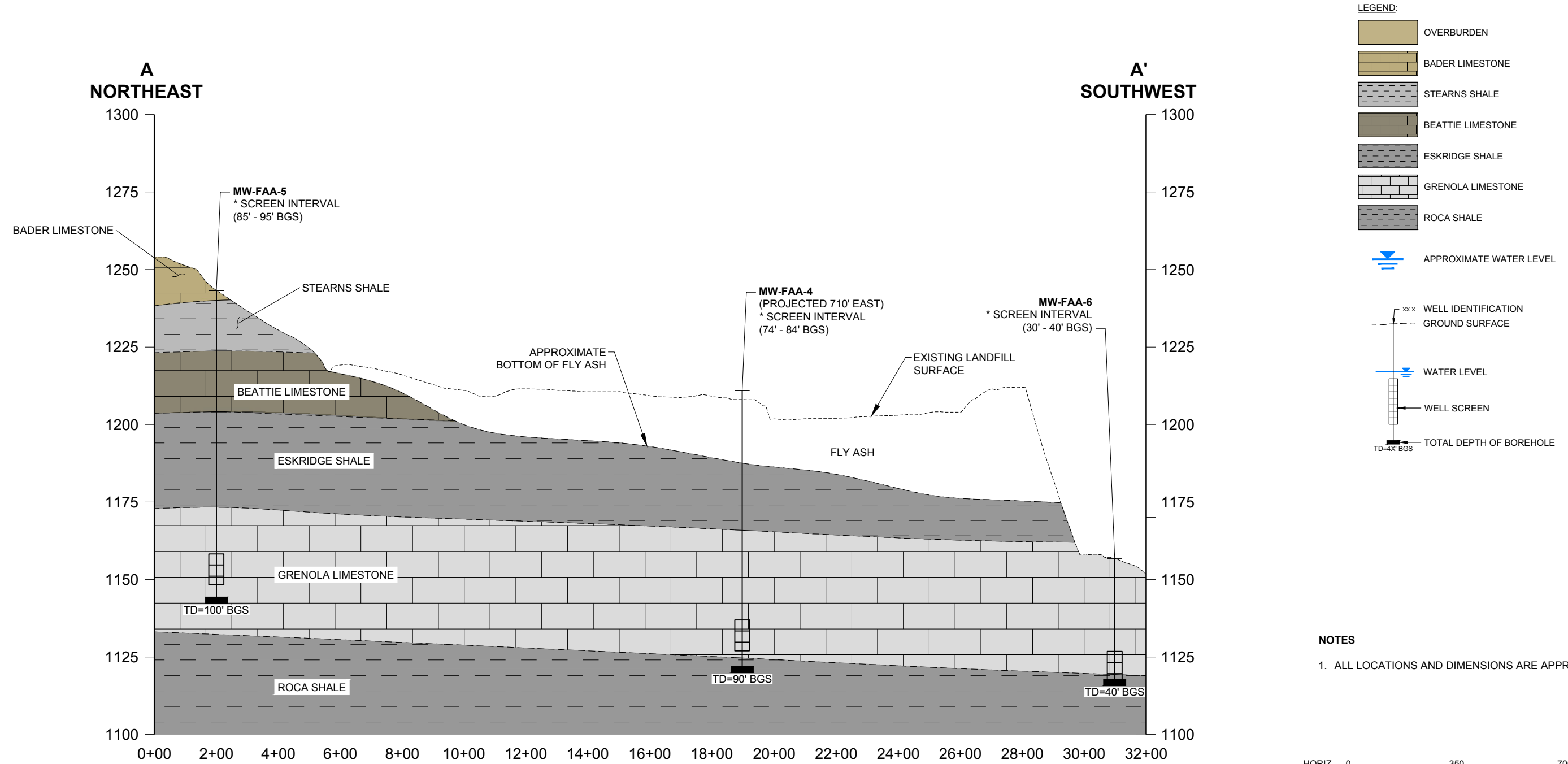
**FLY ASH LANDFILL  
MONITORING WELL LOCATION MAP**

JANUARY 2019

**FIGURE 2**



LUCAS, ANDY  
 \\HALEYALDRICH.COM\SHARE\CLE\_COMMON\PROJECTS\131363-WESTAR-JEC\_FGD\_LANDFILL\_DESIGN\CAD\FIGURES\129778-022\_FLY\_ASH\_A2\129778\_FAA2\_FIG-X\_SITE\_PLAN.DWG  
 Printed: 3/22/2019 7:18 AM Layout: PROF\_B



**HALEY ALDRICH** WESTAR ENERGY  
JEFFREY ENERGY CENTER  
ST. MARYS, KANSAS

**FLY ASH LANDFILL  
GENERALIZED CROSS-SECTION A-A'**

SCALE: AS SHOWN  
MARCH 2019

**FIGURE 3**

## **APPENDIX A**

### **Aerial Photographs**



# HISTORICAL AERIAL REPORT

*for the site:*

**JEC**

25905 Jeffrey Road  
 St. Marys, KS 66536  
 PO #:

Report ID: 20180302344  
 Completed: 3/13/2018

**ERIS Information Inc.**

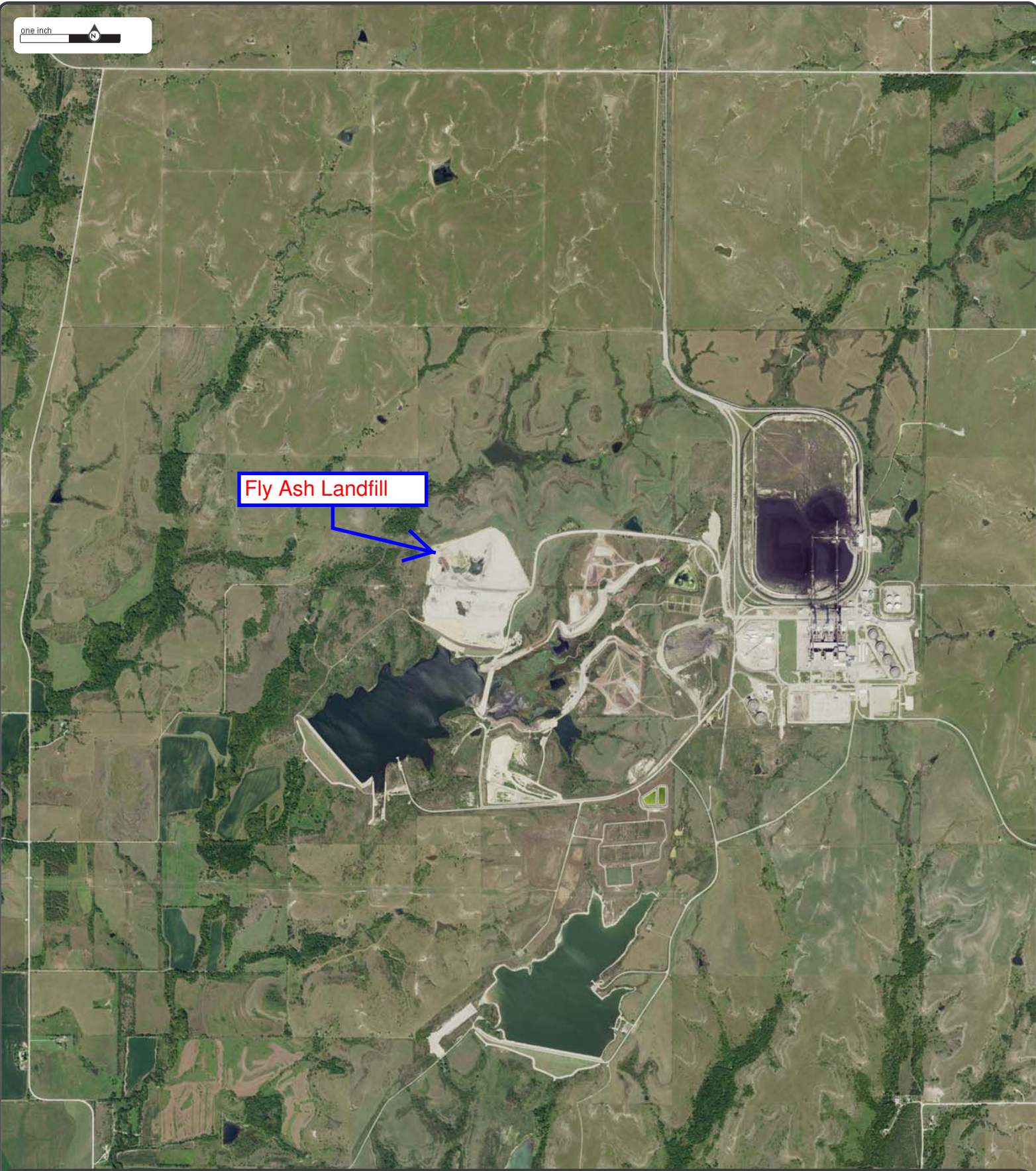
Environmental Risk Information  
 Services (ERIS)  
 A division of Glacier Media Inc.  
 T: 1.866.517.5204  
 E: info@erisinfo.com

[www.erisinfo.com](http://www.erisinfo.com)

## Search Results Summary

Date	Source	Scale	Comment
2017	NAIP - National Agriculture Information Program	1"=2500'	
2015	NAIP - National Agriculture Information Program	1"=2500'	
2014	NAIP - National Agriculture Information Program	1"=2500'	
2012	NAIP - National Agriculture Information Program	1"=2500'	
2010	NAIP - National Agriculture Information Program	1"=2500'	
2008	NAIP - National Agriculture Information Program	1"=2500'	
2006	NAIP - National Agriculture Information Program	1"=2500'	
2005	NAIP - National Agriculture Information Program	1"=2500'	
2004	NAIP - National Agriculture Information Program	1"=2500'	
2003	NAIP - National Agriculture Information Program	1"=2500'	
2002	USGS - US Geological Survey	1"=2500'	
1991	USGS - US Geological Survey	1"=2500'	
1981	NHAP - National High Altitude Photography	1"=2500'	
1977	USGS - US Geological Survey	1"=2500'	
1954	AMS - Army Mapping Service	1"=2500'	
1950	AMS - Army Mapping Service	1"=2500'	

one inch 



Date: 2017  
Source: NAIP  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949

[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 2015  
Source: NAIP  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: **2014**  
Source: **NAIP**  
Scale: **1" to 2500'**  
Comments:



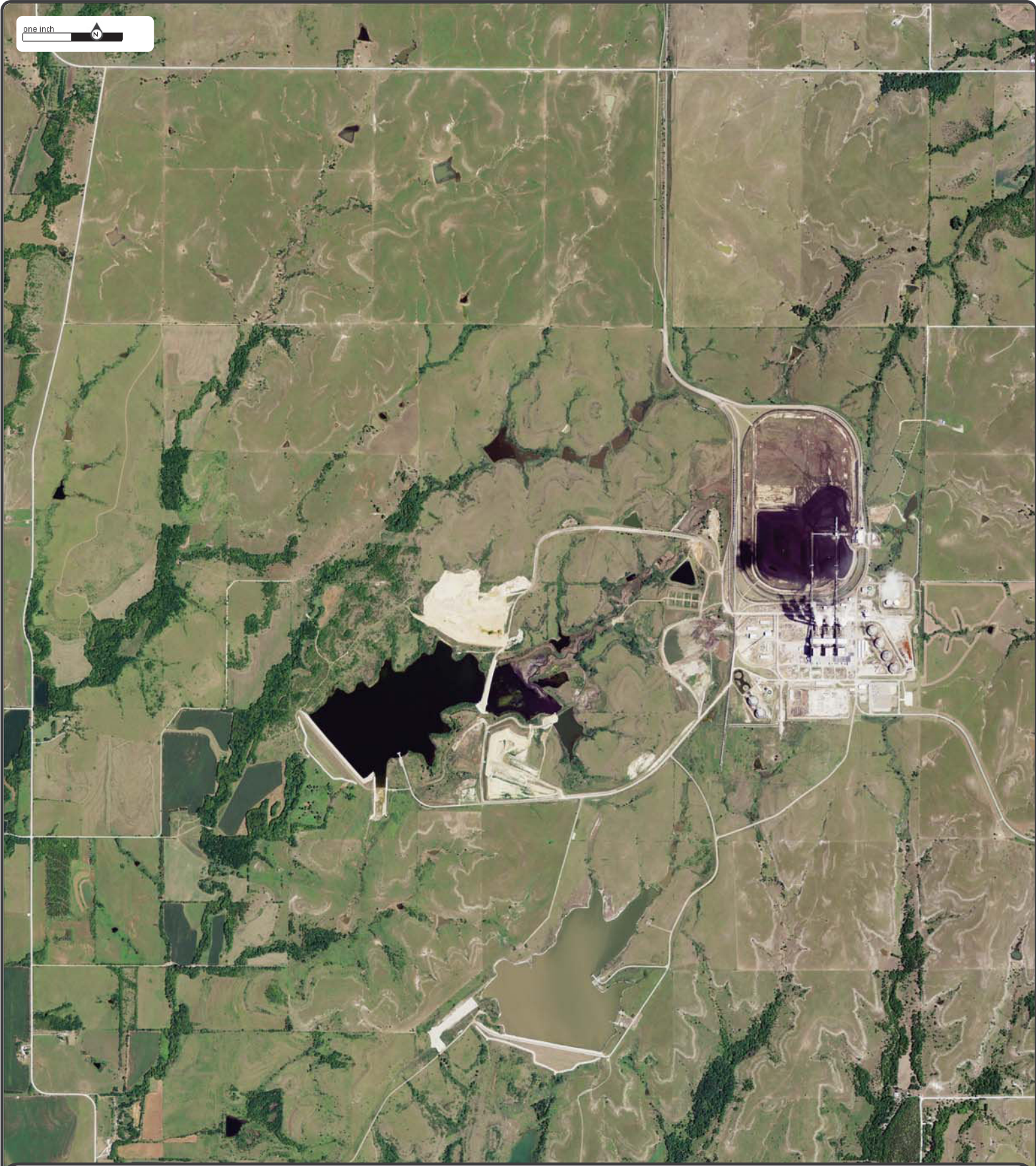
Subject: *25905 Jeffrey Road St. Marys KS*  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 2012  
Source: NAIP  
Scale: 1" to 2500'  
Comments:



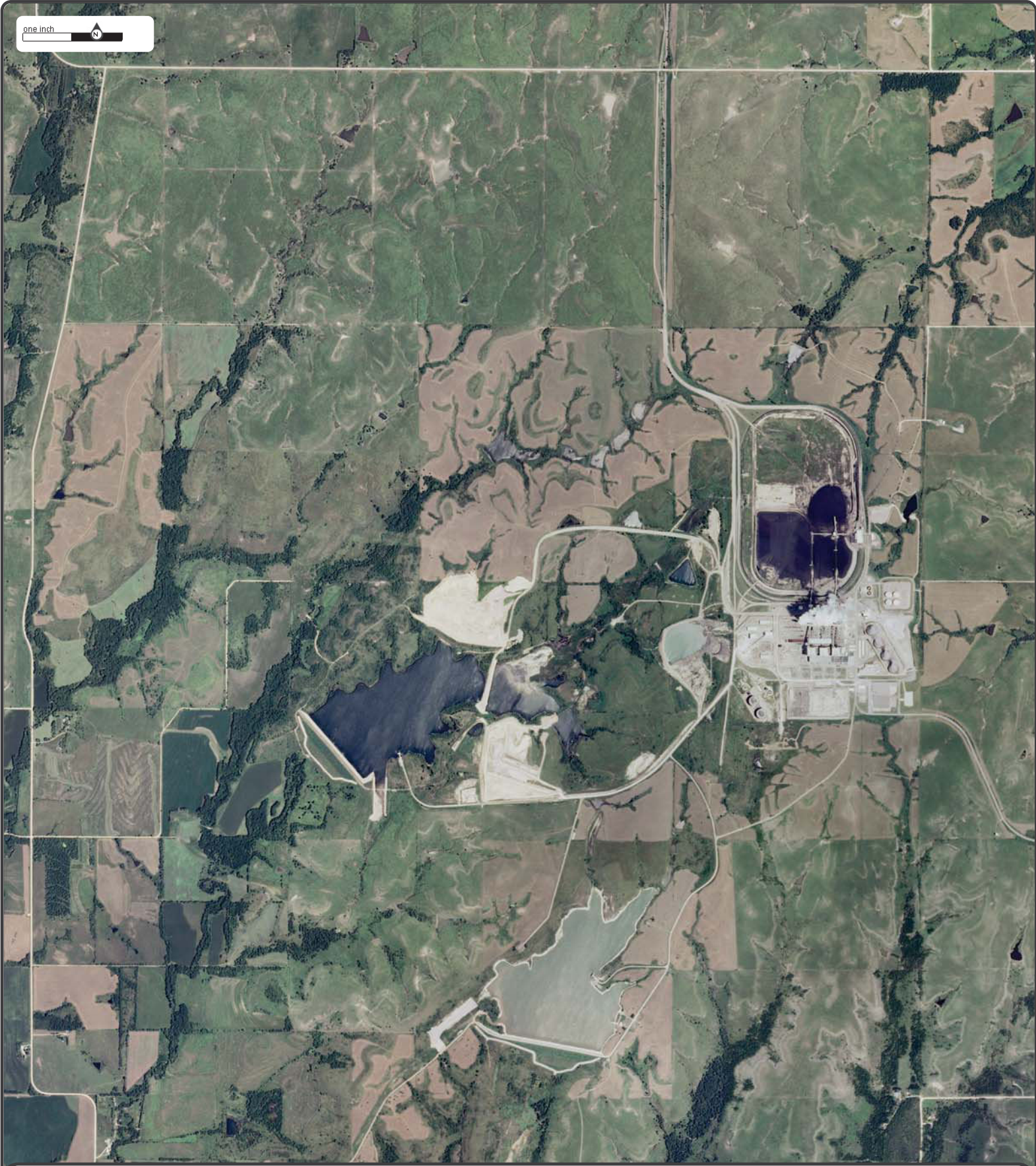
Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 2010  
Source: NAIP  
Scale: 1" to 2500'  
Comments:



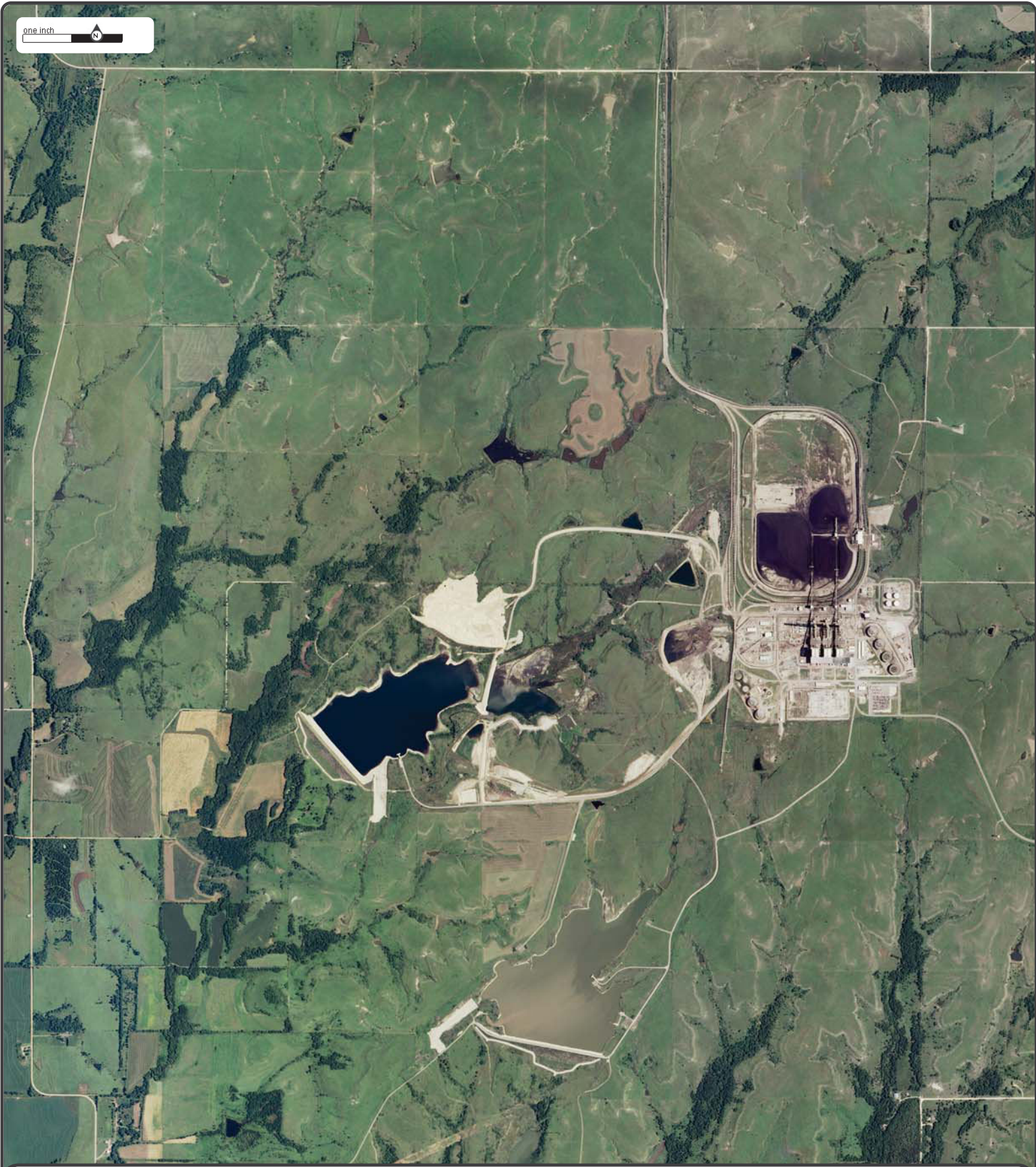
Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 2008  
Source: NAIP  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949

**ERIS**  
ENVIRONMENTAL RISK INFORMATION SERVICES



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch 



Date: **2006**  
Source: **NAIP**  
Scale: **1" to 2500'**  
Comments:



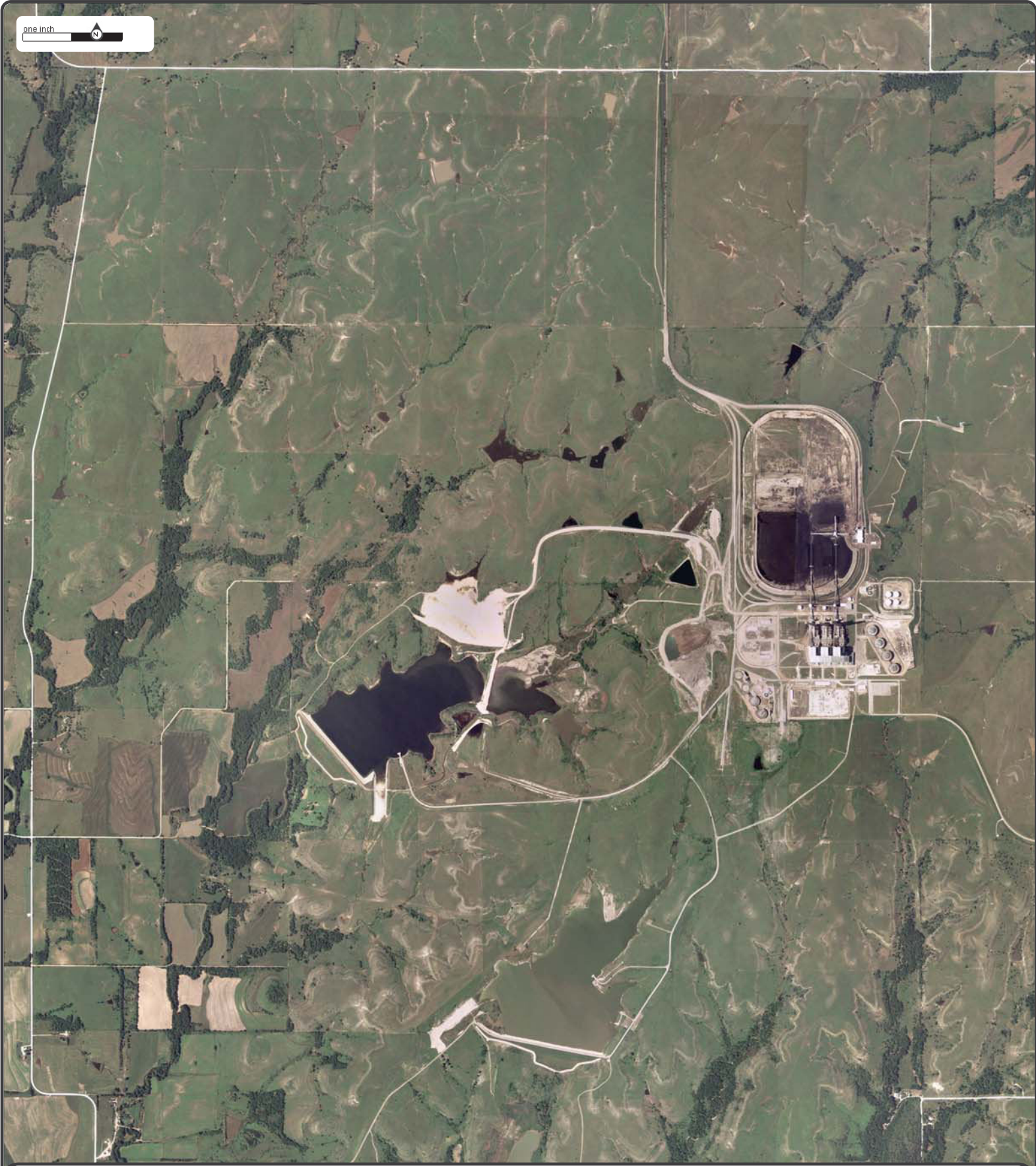
Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 2005  
Source: NAIP  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 2004  
Source: NAIP  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949

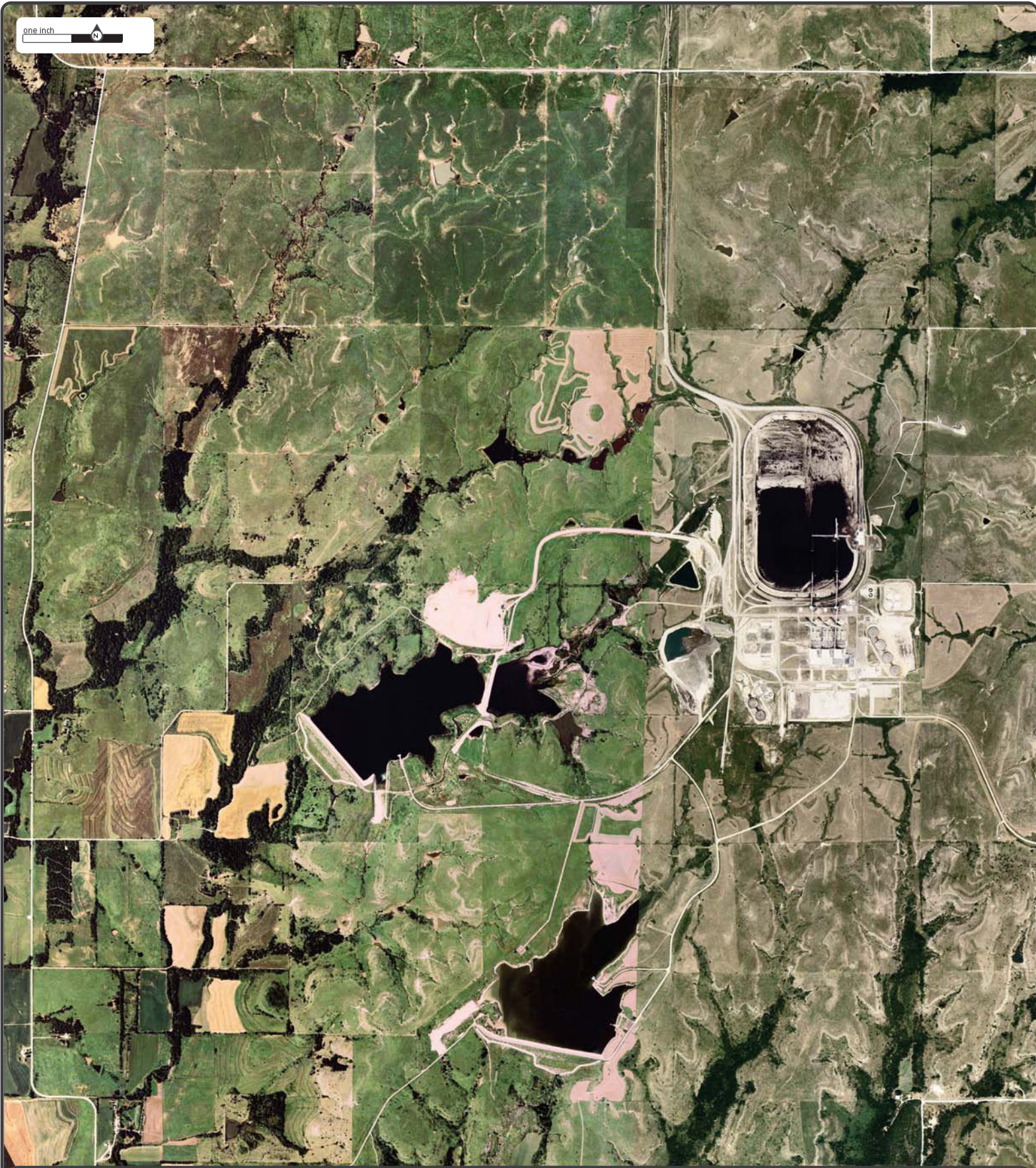
**ERIS**  
ENVIRONMENTAL RISK INFORMATION SERVICES



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 2003  
Source: NAIP  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949

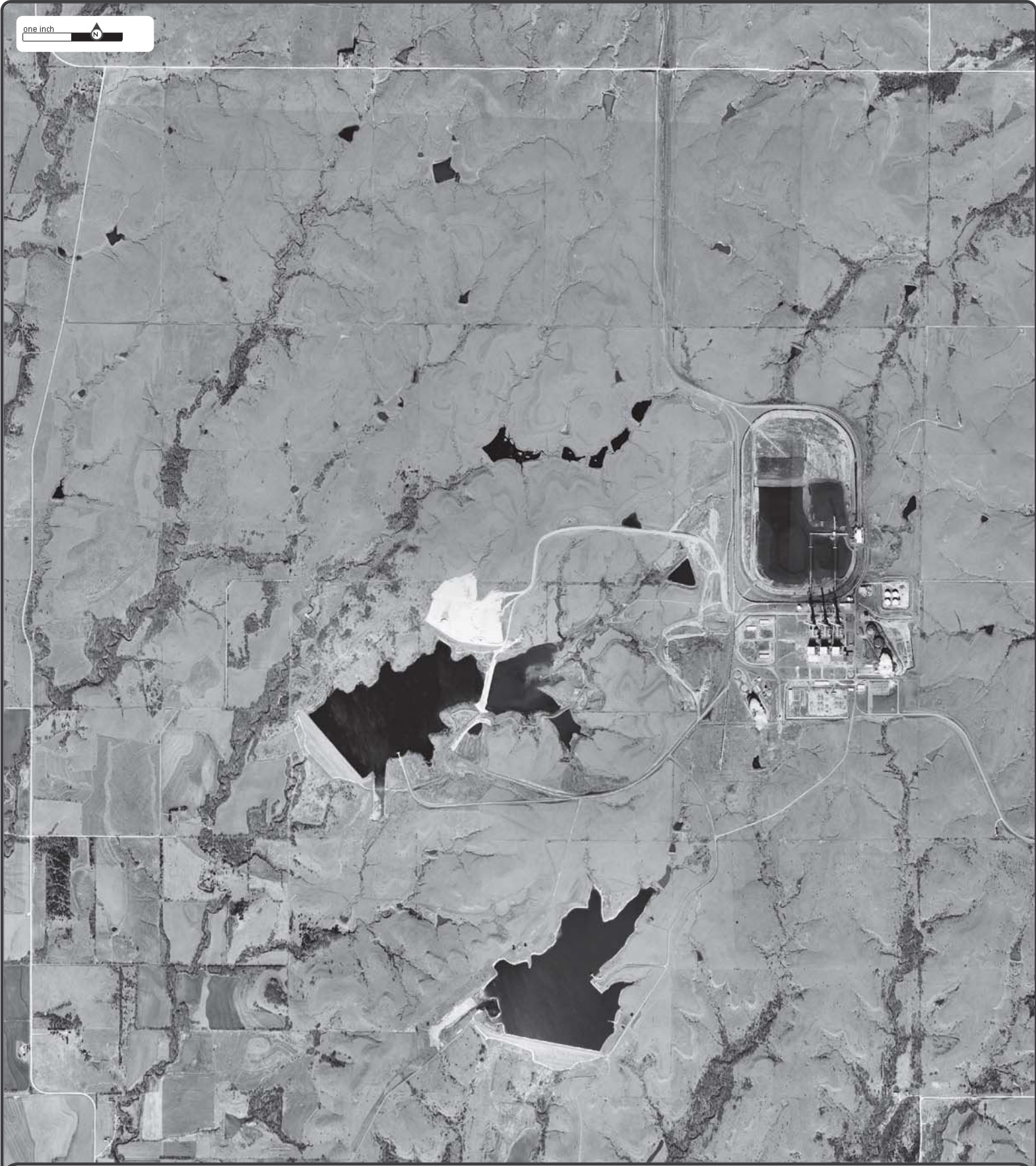
**ERIS**  
ENVIRONMENTAL RISK INFORMATION SERVICES



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 2002  
Source: USGS  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 1991  
Source: USGS  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 1981  
Source: NHAP  
Scale: 1" to 2500'  
Comments:



**ERIS**  
ENVIRONMENTAL RISK INFORMATION SERVICES



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949

[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 1977  
Source: USGS  
Scale: 1" to 2500'  
Comments:

Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch



Date: 1954  
Source: AMS  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949

[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204



one inch 



Date: 1950  
Source: AMS  
Scale: 1" to 2500'  
Comments:



Subject: 25905 Jeffrey Road St. Marys KS  
Approx Center: 39.28431 / -96.13949



[www.erisinfo.com](http://www.erisinfo.com) | 1.866.517.5204

## **APPENDIX B**

### **Topographic Maps**





## TOPOGRAPHIC MAP RESEARCH RESULTS

Date: 2018-03-02

**Project Property: 25905 Jeffrey Road, St. Marys, KS**

ERIS Order Number: 20180302344

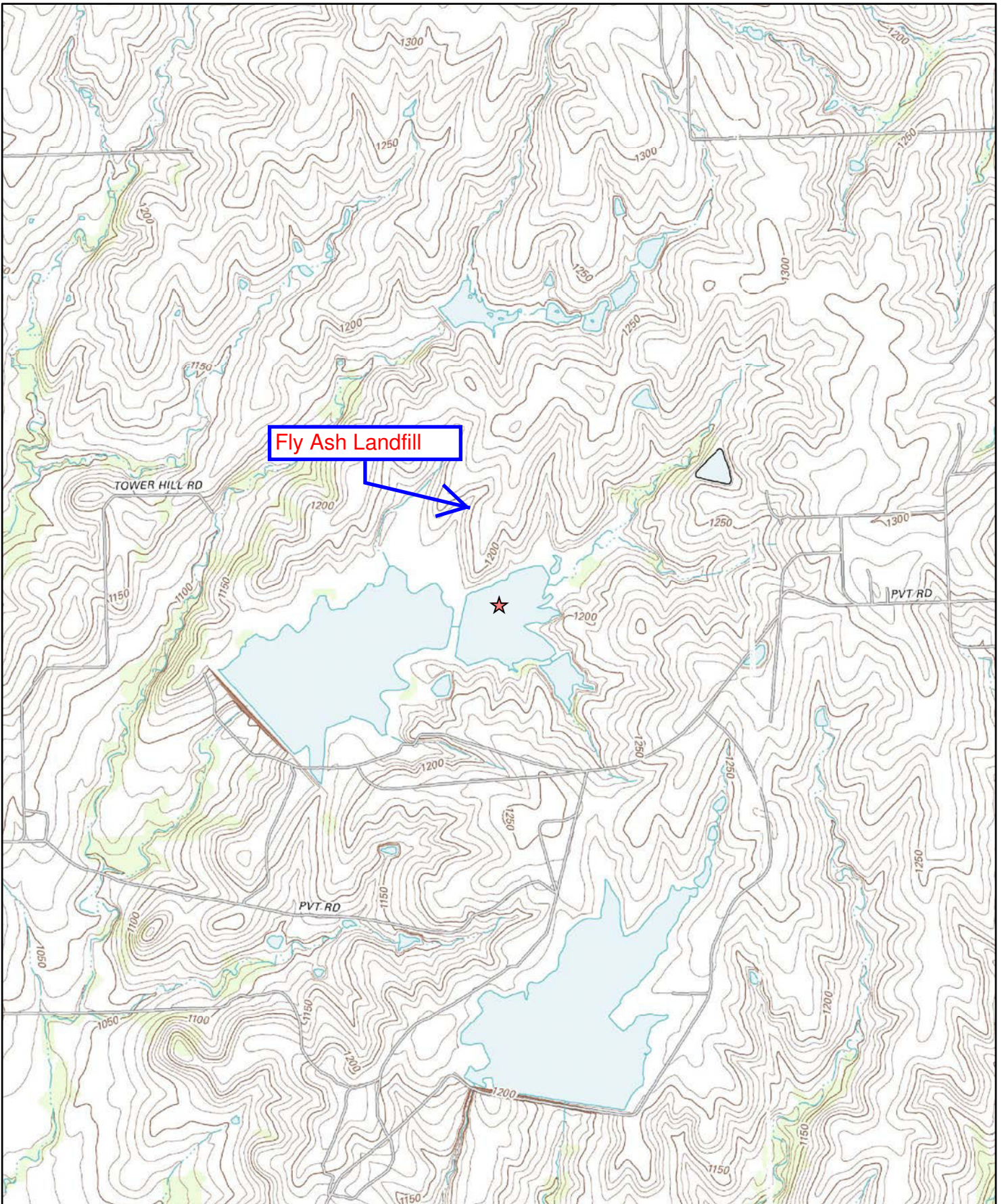
We have searched USGS collections of current topographic maps and historical topographic maps for the project property. Below is a list of maps found for the project property and adjacent area. Maps are from 7.5 and 15 minute topographic map series, if available.

Year	Map Series
2012	7.5
1978	7.5
1964	7.5

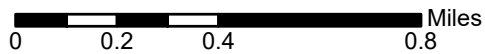
*Topographic Maps included in this report are produced by the USGS and are to be used for research purposes including a phase I report. Maps are not to be resold as commercial property.*

**No warranty of Accuracy or Liability for ERIS:** *The information contained in this report has been produced by ERIS Information Inc. (in the US) and ERIS Information Limited Partnership (in Canada), both doing business as 'ERIS', using Topographic Maps produced by the USGS. This maps contained herein does not purport to be and does not constitute a guarantee of the accuracy of the information contained herein. Although ERIS has endeavored to present you with information that is accurate, ERIS disclaims, any and all liability for any errors, omissions, or inaccuracies in such information and data, whether attributable to inadvertence, negligence or otherwise, and for any consequences arising therefrom. Liability on the part of ERIS is limited to the monetary value paid for this report.*





2012



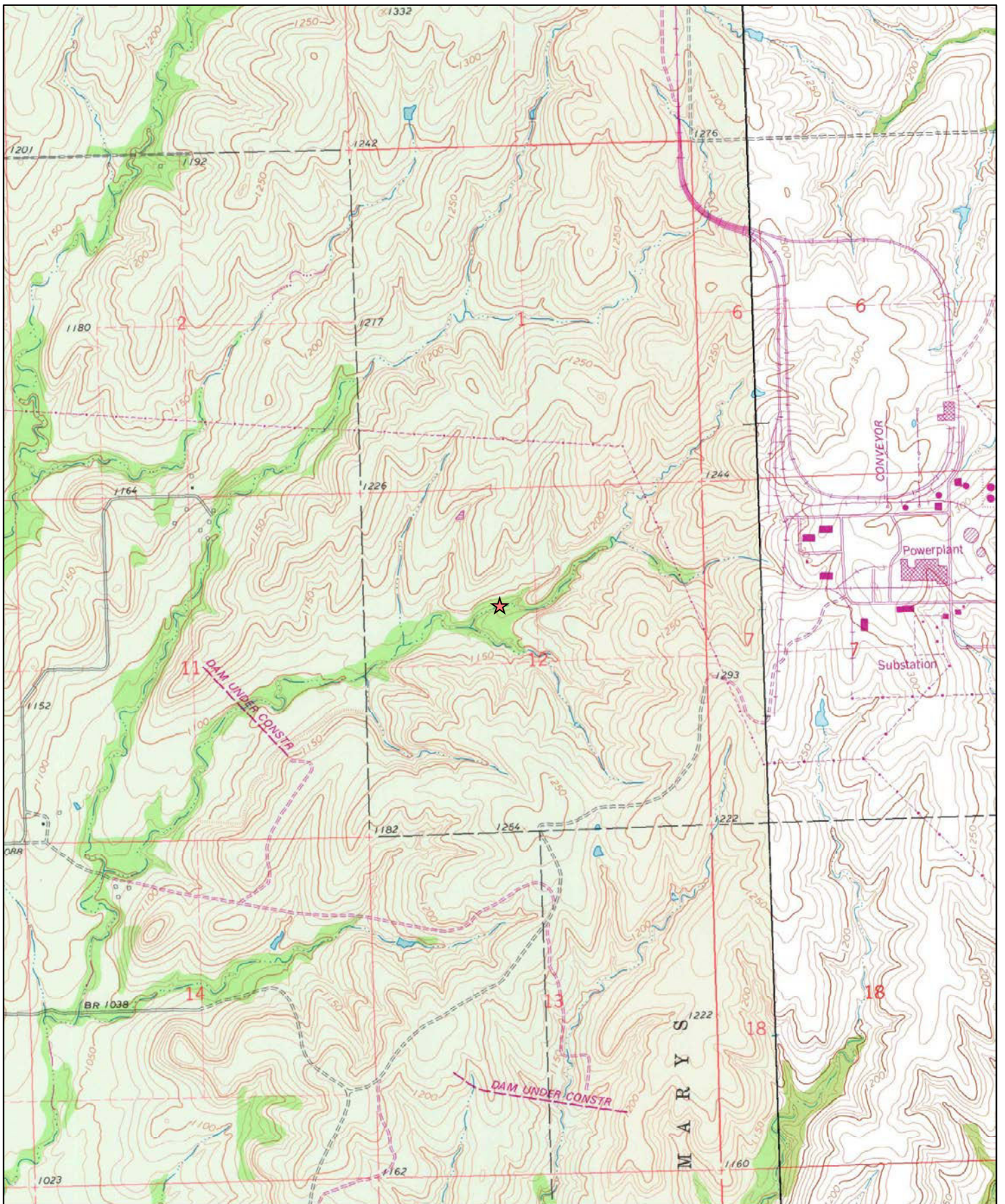
Order No. 20180302344

Quadrangle(s): Laclede, KS

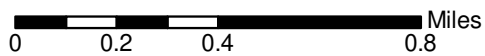
Source: USGS 7.5 Minute Topographic Map







1978



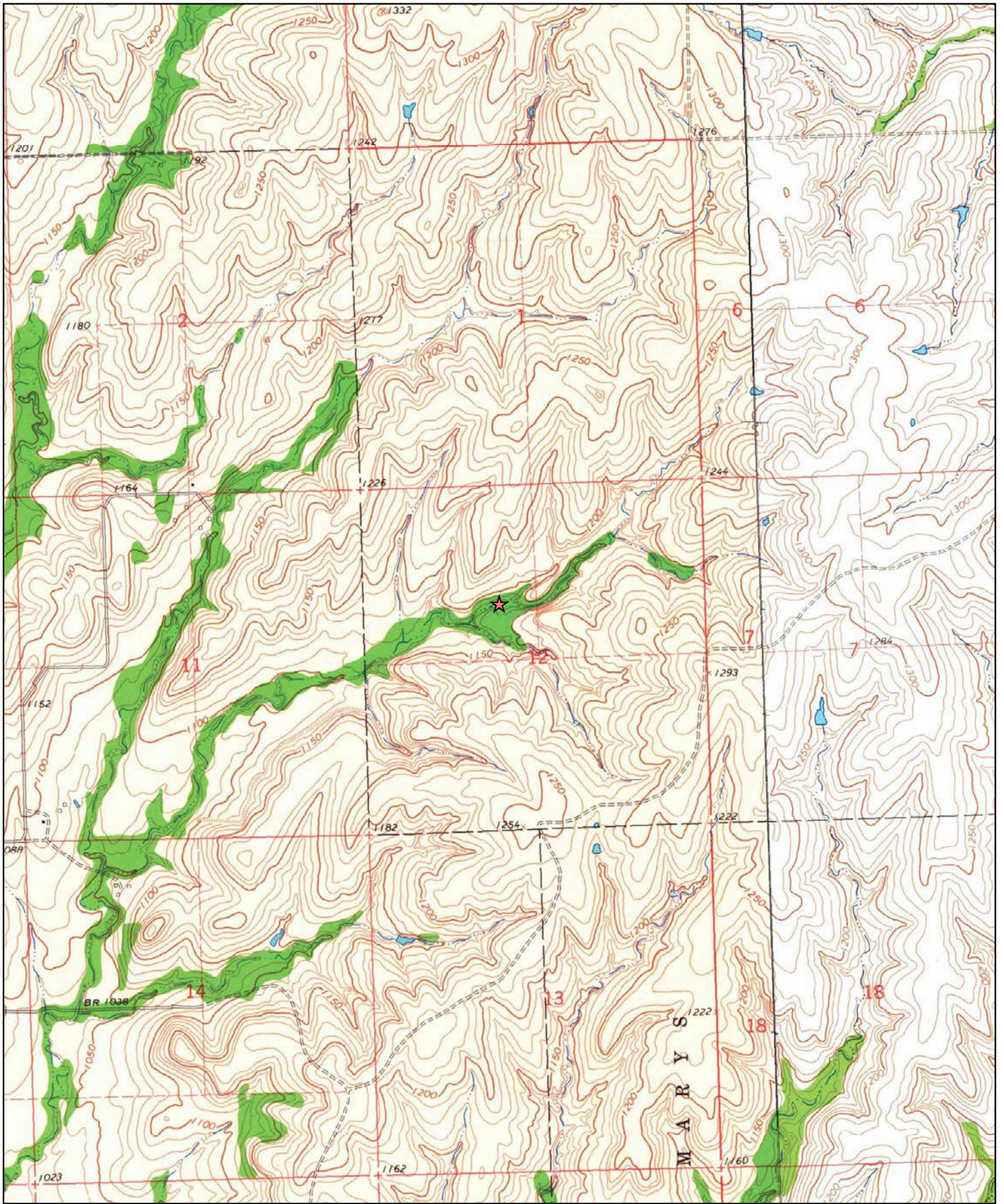
Order No. 20180302344

Quadrangle(s): Laclede, KS

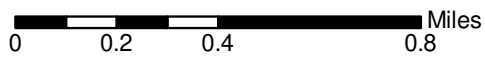
Source: USGS 7.5 Minute Topographic Map







1964



Order No. 20180302344

Quadrangle(s) : Laclede,KS

Source: USGS 7.5 Minute Topographic Map





## **APPENDIX C**

### **Laboratory Reports**

December 28, 2018

Brandon Griffin  
Westar Energy  
818 S. Kansas Ave  
Topeka, KS 66612

RE: Project: JEC-FA2 LANDFILL  
Pace Project No.: 60284822

Dear Brandon Griffin:

Enclosed are the analytical results for sample(s) received by the laboratory between October 24, 2018 and October 25, 2018. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

Revised Report\_rev.1 Per the client's request, DI Leachate metals were added to the samples.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Heather Wilson  
heather.wilson@pacelabs.com  
1(913)563-1407  
Project Manager

Enclosures

cc: HEATH HORYNA, WESTAR ENERGY  
Andrew Hare, Westar Energy  
Adam Kneeling, Haley & Aldrich, Inc.  
JARED MORRISON, WESTAR ENERGY  
Melissa Michels, Westar Energy  
JD Schlegel, KCP&L & Westar



## REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,  
without the written consent of Pace Analytical Services, LLC.

## CERTIFICATIONS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

---

### **Kansas Certification IDs**

9608 Loiret Boulevard, Lenexa, KS 66219

Missouri Certification Number: 10090

Arkansas Drinking Water

WY STR Certification #: 2456.01

Arkansas Certification #: 18-016-0

Arkansas Drinking Water

Illinois Certification #: 004455

Iowa Certification #: 118

Kansas/NELAP Certification #: E-10116 / E10426

Louisiana Certification #: 03055

Nevada Certification #: KS000212018-1

Oklahoma Certification #: 9205/9935

Texas Certification #: T104704407-18-11

Utah Certification #: KS000212018-8

Kansas Field Laboratory Accreditation: # E-92587

Missouri Certification: 10070

Missouri Certification Number: 10090

---

## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60284822001	MW-FAA-7 (B-1) 117.5'-120'	Solid	10/23/18 12:00	10/25/18 15:00
60284822002	MW-FAA-8 (B-2) 31.5'-34'	Solid	10/23/18 12:00	10/25/18 15:00
60284822003	MW-FAA-9 (B-3) 24'-25'	Solid	10/23/18 12:00	10/25/18 15:00
60284822004	MW-FAA-10 (B-4) 28'-29.5'	Solid	10/23/18 12:00	10/25/18 15:00
60284822005	MW-FAA-11 (B-6) 78.5'-79'	Solid	10/23/18 12:00	10/25/18 15:00
60284822007	MW-FAA-7 102'-104'	Solid	10/23/18 12:00	10/25/18 15:00
60284822009	MW-FAA-11 61'-61.5'	Solid	10/23/18 12:00	10/25/18 15:00
60284822010	MW-FAA-7 (B-1) 117.5'-120'	Water	10/23/18 12:00	10/24/18 15:00
60284822011	MW-FAA-8 (B-2) 31.5'-34'	Water	10/23/18 12:00	10/24/18 15:00
60284822012	MW-FAA-9 (B-3) 24'-25'	Water	10/23/18 12:00	10/24/18 15:00
60284822013	MW-FAA-10 (B-4) 28'-29.5'	Water	10/23/18 12:00	10/24/18 15:00
60284822014	MW-FAA-11 (B-6) 78.5'-79'	Water	10/23/18 12:00	10/24/18 15:00
60284822015	MW-FAA-7 102'-104'	Water	10/23/18 12:00	10/24/18 15:00
60284822016	MW-FAA-11 61'-61.5'	Water	10/23/18 12:00	10/24/18 15:00

## REPORT OF LABORATORY ANALYSIS

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without the written consent of Pace Analytical Services, LLC.



### SAMPLE ANALYTE COUNT

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60284822001	MW-FAA-7 (B-1) 117.5'-120'	EPA 6010	EMR	2	PASI-K
		EPA 6010	EMR	2	PASI-K
		EPA 6020	JGP	1	PASI-K
		EPA 6020	JGP	1	PASI-K
		ASTM D2974	DWC	1	PASI-K
60284822002	MW-FAA-8 (B-2) 31.5'-34'	EPA 6010	EMR	2	PASI-K
		EPA 6010	EMR	2	PASI-K
		EPA 6020	JGP	1	PASI-K
		EPA 6020	JGP	1	PASI-K
		ASTM D2974	DWC	1	PASI-K
60284822003	MW-FAA-9 (B-3) 24'-25'	EPA 6010	EMR	2	PASI-K
		EPA 6010	EMR	2	PASI-K
		EPA 6020	JGP	1	PASI-K
		EPA 6020	JGP	1	PASI-K
		ASTM D2974	DWC	1	PASI-K
60284822004	MW-FAA-10 (B-4) 28'-29.5'	EPA 6010	EMR	2	PASI-K
		EPA 6010	EMR	2	PASI-K
		EPA 6020	JGP	1	PASI-K
		EPA 6020	JGP	1	PASI-K
		ASTM D2974	DWC	1	PASI-K
60284822005	MW-FAA-11 (B-6) 78.5'-79'	EPA 6010	EMR	2	PASI-K
		EPA 6010	EMR	2	PASI-K
		EPA 6020	JGP	1	PASI-K
		EPA 6020	JGP	1	PASI-K
		ASTM D2974	DWC	1	PASI-K
60284822007	MW-FAA-7 102'-104'	EPA 6010	EMR	2	PASI-K
		EPA 6010	EMR	2	PASI-K
		EPA 6020	JGP	1	PASI-K
		EPA 6020	JGP	1	PASI-K
		ASTM D2974	DWC	1	PASI-K
60284822009	MW-FAA-11 61'-61.5'	EPA 6010	EMR	2	PASI-K
		EPA 6010	EMR	2	PASI-K
		EPA 6020	JGP	1	PASI-K
		EPA 6020	JGP	1	PASI-K
		ASTM D2974	DWC	1	PASI-K
60284822010	MW-FAA-7 (B-1) 117.5'-120'	EPA 6020	JGP	1	PASI-K
60284822011	MW-FAA-8 (B-2) 31.5'-34'	EPA 6020	JGP	1	PASI-K

### REPORT OF LABORATORY ANALYSIS

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without the written consent of Pace Analytical Services, LLC.

### SAMPLE ANALYTE COUNT

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60284822012	MW-FAA-9 (B-3) 24'-25'	EPA 6020	JGP	1	PASI-K
60284822013	MW-FAA-10 (B-4) 28'-29.5'	EPA 6020	JGP	1	PASI-K
60284822014	MW-FAA-11 (B-6) 78.5'-79'	EPA 6020	JGP	1	PASI-K
60284822015	MW-FAA-7 102'-104'	EPA 6020	JGP	1	PASI-K
60284822016	MW-FAA-11 61'-61.5'	EPA 6020	JGP	1	PASI-K

### REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

---

**Method:** EPA 6010

**Description:** 6010 MET ICP Red. Interference

**Client:** WESTAR ENERGY

**Date:** December 28, 2018

**General Information:**

7 samples were analyzed for EPA 6010. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 3050 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 560051

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60289313002

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2298530)
  - Calcium

R1: RPD value was outside control limits.

- MSD (Lab ID: 2298531)
  - Boron

**Additional Comments:**

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## PROJECT NARRATIVE

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

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**Method:** EPA 6010

**Description:** 6010 MET ICP, SPLP

**Client:** WESTAR ENERGY

**Date:** December 28, 2018

### General Information:

7 samples were analyzed for EPA 6010. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

### Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

H2: Extraction or preparation conducted outside EPA method holding time.

- MW-FAA-10 (B-4) 28'-29.5' (Lab ID: 60284822004)
- MW-FAA-11 (B-6) 78.5'-79' (Lab ID: 60284822005)
- MW-FAA-11 61'-61.5' (Lab ID: 60284822009)
- MW-FAA-7 (B-1) 117.5'-120' (Lab ID: 60284822001)
- MW-FAA-7 102'-104' (Lab ID: 60284822007)
- MW-FAA-8 (B-2) 31.5'-34' (Lab ID: 60284822002)
- MW-FAA-9 (B-3) 24'-25' (Lab ID: 60284822003)

### Sample Preparation:

The samples were prepared in accordance with EPA 3010 with any exceptions noted below.

### Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

### Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

### Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

### Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

### Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 560655

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60289490006

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2301393)
  - Calcium
- MSD (Lab ID: 2301394)
  - Calcium

### Additional Comments:

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## PROJECT NARRATIVE

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

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**Method:** EPA 6020

**Description:** 6020 MET ICPMS

**Client:** WESTAR ENERGY

**Date:** December 28, 2018

### General Information:

14 samples were analyzed for EPA 6020. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

### Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

### Sample Preparation:

The samples were prepared in accordance with EPA 3010 with any exceptions noted below.

The samples were prepared in accordance with EPA 3010 with any exceptions noted below.

### Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

### Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

### Internal Standards:

All internal standards were within QC limits with any exceptions noted below.

### Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

QC Batch: 561774

B: Analyte was detected in the associated method blank.

- BLANK for HBN 561774 [MPRP/486 (Lab ID: 2306167)
- Molybdenum

### Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

### Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 560713

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60284822001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2301591)
  - Molybdenum
- MSD (Lab ID: 2301592)
  - Molybdenum

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## PROJECT NARRATIVE

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

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**Method:** EPA 6020

**Description:** 6020 MET ICPMS

**Client:** WESTAR ENERGY

**Date:** December 28, 2018

QC Batch: 561774

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60284822010,60284822016

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2306171)
  - Molybdenum
- MSD (Lab ID: 2306172)
  - Molybdenum

**Additional Comments:**

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## PROJECT NARRATIVE

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

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**Method:** EPA 6020

**Description:** 6020 MET ICPM, SPLP

**Client:** WESTAR ENERGY

**Date:** December 28, 2018

### General Information:

7 samples were analyzed for EPA 6020. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

### Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

H2: Extraction or preparation conducted outside EPA method holding time.

- MW-FAA-10 (B-4) 28'-29.5' (Lab ID: 60284822004)
- MW-FAA-11 (B-6) 78.5'-79' (Lab ID: 60284822005)
- MW-FAA-11 61'-61.5' (Lab ID: 60284822009)
- MW-FAA-7 (B-1) 117.5'-120' (Lab ID: 60284822001)
- MW-FAA-7 102'-104' (Lab ID: 60284822007)
- MW-FAA-8 (B-2) 31.5'-34' (Lab ID: 60284822002)
- MW-FAA-9 (B-3) 24'-25' (Lab ID: 60284822003)

### Sample Preparation:

The samples were prepared in accordance with EPA 3020 with any exceptions noted below.

### Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

### Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

### Internal Standards:

All internal standards were within QC limits with any exceptions noted below.

### Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

### Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

### Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

### Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-7 (B-1) 117.5'-120' Lab ID: 60284822001** Collected: 10/23/18 12:00 Received: 10/25/18 15:00 Matrix: Solid

**Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.**

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6010 MET ICP Red. Interference</b>								
Analytical Method: EPA 6010 Preparation Method: EPA 3050								
Boron	<b>49.7</b>	mg/kg	10.2	1	12/14/18 08:16	12/18/18 13:18	7440-42-8	
Calcium	<b>7290</b>	mg/kg	10.2	1	12/14/18 08:16	12/18/18 13:18	7440-70-2	
<b>6010 MET ICP, SPLP</b>								
Analytical Method: EPA 6010 Preparation Method: EPA 3010								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Boron	<b>0.22</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:27	7440-42-8	
Calcium	<b>112</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:27	7440-70-2	
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020 Preparation Method: EPA 3010								
Molybdenum	<b>&lt;3.9</b>	mg/kg	3.9	1	12/18/18 15:29	12/19/18 15:38	7439-98-7	M1
<b>6020 MET ICPM, SPLP</b>								
Analytical Method: EPA 6020 Preparation Method: EPA 3020								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Molybdenum	<b>0.0024</b>	mg/L	0.0010	1	12/18/18 10:47	12/18/18 17:45	7439-98-7	
<b>Percent Moisture</b>								
Analytical Method: ASTM D2974								
Percent Moisture	<b>13.7</b>	%	0.50	1		12/14/18 12:05		H1

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-8 (B-2) 31.5'-34'    Lab ID: 60284822002    Collected: 10/23/18 12:00    Received: 10/25/18 15:00    Matrix: Solid**

**Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.**

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6010 MET ICP Red. Interference</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3050								
Boron	<b>38.8</b>	mg/kg	8.6	1	12/14/18 08:16	12/18/18 13:20	7440-42-8	
Calcium	<b>83200</b>	mg/kg	8.6	1	12/14/18 08:16	12/18/18 13:20	7440-70-2	
<b>6010 MET ICP, SPLP</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3010								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Boron	<b>&lt;0.10</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:30	7440-42-8	
Calcium	<b>21.0</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:30	7440-70-2	
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>8.3</b>	mg/kg	4.8	1	12/18/18 15:29	12/19/18 15:41	7439-98-7	
<b>6020 MET ICPM, SPLP</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3020								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Molybdenum	<b>0.061</b>	mg/L	0.0010	1	12/18/18 10:47	12/18/18 17:46	7439-98-7	
<b>Percent Moisture</b>								
Analytical Method: ASTM D2974								
Percent Moisture	<b>6.7</b>	%	0.50	1		12/14/18 12:05		H1

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-9 (B-3) 24'-25'      Lab ID: 60284822003      Collected: 10/23/18 12:00      Received: 10/25/18 15:00      Matrix: Solid**

**Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.**

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6010 MET ICP Red. Interference</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3050								
Boron	<b>30.4</b>	mg/kg	9.2	1	12/14/18 08:16	12/18/18 13:22	7440-42-8	
Calcium	<b>50600</b>	mg/kg	9.2	1	12/14/18 08:16	12/18/18 13:22	7440-70-2	
<b>6010 MET ICP, SPLP</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3010								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Boron	<b>&lt;0.10</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:32	7440-42-8	
Calcium	<b>36.2</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:32	7440-70-2	
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>13.6</b>	mg/kg	4.0	1	12/18/18 15:29	12/19/18 15:42	7439-98-7	
<b>6020 MET ICPM, SPLP</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3020								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Molybdenum	<b>0.067</b>	mg/L	0.0010	1	12/18/18 10:47	12/18/18 17:47	7439-98-7	
<b>Percent Moisture</b>								
Analytical Method: ASTM D2974								
Percent Moisture	<b>10.9</b>	%	0.50	1		12/14/18 12:05		H1

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-10 (B-4) 28'-29.5'**    **Lab ID: 60284822004**    Collected: 10/23/18 12:00    Received: 10/25/18 15:00    Matrix: Solid

*Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.*

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6010 MET ICP Red. Interference</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3050								
Boron	<b>33.4</b>	mg/kg	8.4	1	12/14/18 08:16	12/18/18 13:24	7440-42-8	
Calcium	<b>47800</b>	mg/kg	8.4	1	12/14/18 08:16	12/18/18 13:24	7440-70-2	
<b>6010 MET ICP, SPLP</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3010								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Boron	<b>&lt;0.10</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:34	7440-42-8	
Calcium	<b>28.9</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:34	7440-70-2	
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>11.0</b>	mg/kg	5.5	1	12/18/18 15:29	12/19/18 15:43	7439-98-7	
<b>6020 MET ICPM, SPLP</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3020								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Molybdenum	<b>0.038</b>	mg/L	0.0010	1	12/18/18 10:47	12/18/18 17:48	7439-98-7	
<b>Percent Moisture</b>								
Analytical Method: ASTM D2974								
Percent Moisture	<b>11.0</b>	%	0.50	1		12/14/18 12:05		H1

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### ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-11 (B-6) 78.5'-79' Lab ID: 60284822005** Collected: 10/23/18 12:00 Received: 10/25/18 15:00 Matrix: Solid

**Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.**

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6010 MET ICP Red. Interference</b>								
Analytical Method: EPA 6010 Preparation Method: EPA 3050								
Boron	<b>&lt;82.6</b>	mg/kg	82.6	10	12/14/18 08:16	12/18/18 14:07	7440-42-8	
Calcium	<b>119000</b>	mg/kg	82.6	10	12/14/18 08:16	12/18/18 14:07	7440-70-2	
<b>6010 MET ICP, SPLP</b>								
Analytical Method: EPA 6010 Preparation Method: EPA 3010								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Boron	<b>&lt;0.10</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:41	7440-42-8	
Calcium	<b>16.0</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:41	7440-70-2	
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020 Preparation Method: EPA 3010								
Molybdenum	<b>&lt;3.9</b>	mg/kg	3.9	1	12/18/18 15:29	12/19/18 15:44	7439-98-7	
<b>6020 MET ICPM, SPLP</b>								
Analytical Method: EPA 6020 Preparation Method: EPA 3020								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Molybdenum	<b>0.016</b>	mg/L	0.0010	1	12/18/18 10:47	12/18/18 17:49	7439-98-7	
<b>Percent Moisture</b>								
Analytical Method: ASTM D2974								
Percent Moisture	<b>11.0</b>	%	0.50	1		12/14/18 12:05		H1

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-7 102'-104'**      **Lab ID: 60284822007**      Collected: 10/23/18 12:00      Received: 10/25/18 15:00      Matrix: Solid

*Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.*

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6010 MET ICP Red. Interference</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3050								
Boron	<b>45.4</b>	mg/kg	10.6	1	12/14/18 08:16	12/18/18 13:28	7440-42-8	
Calcium	<b>101000</b>	mg/kg	10.6	1	12/14/18 08:16	12/18/18 13:28	7440-70-2	
<b>6010 MET ICP, SPLP</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3010								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Boron	<b>0.15</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:43	7440-42-8	
Calcium	<b>35.2</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:43	7440-70-2	
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>9.4</b>	mg/kg	4.1	1	12/18/18 15:29	12/19/18 15:48	7439-98-7	
<b>6020 MET ICPM, SPLP</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3020								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Molybdenum	<b>0.24</b>	mg/L	0.0010	1	12/18/18 10:47	12/18/18 17:55	7439-98-7	
<b>Percent Moisture</b>								
Analytical Method: ASTM D2974								
Percent Moisture	<b>9.3</b>	%	0.50	1		12/14/18 12:05		H1

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-11 61'-61.5**      **Lab ID: 60284822009**      Collected: 10/23/18 12:00      Received: 10/25/18 15:00      Matrix: Solid

*Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.*

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6010 MET ICP Red. Interference</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3050								
Boron	<b>40.9</b>	mg/kg	8.5	1	12/14/18 08:16	12/18/18 13:31	7440-42-8	
Calcium	<b>83600</b>	mg/kg	8.5	1	12/14/18 08:16	12/18/18 13:31	7440-70-2	
<b>6010 MET ICP, SPLP</b>								
Analytical Method: EPA 6010    Preparation Method: EPA 3010								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Boron	<b>0.10</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:45	7440-42-8	
Calcium	<b>30.1</b>	mg/L	0.10	1	12/17/18 17:30	12/18/18 15:45	7440-70-2	
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>8.8</b>	mg/kg	3.8	1	12/18/18 15:29	12/19/18 15:49	7439-98-7	
<b>6020 MET ICPM, SPLP</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3020								
Leachate Method/Date: EPA 1312; 12/16/18 00:00								
Molybdenum	<b>0.25</b>	mg/L	0.0010	1	12/18/18 10:47	12/19/18 11:10	7439-98-7	
<b>Percent Moisture</b>								
Analytical Method: ASTM D2974								
Percent Moisture	<b>8.3</b>	%	0.50	1		12/14/18 12:05		H1

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-7 (B-1) 117.5'-120'**    **Lab ID: 60284822010**    Collected: 10/23/18 12:00    Received: 10/24/18 15:00    Matrix: Water

Comments: • The analyses completed on this sample are a DI Leachate.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>3.0</b>	ug/L	1.0	1	12/26/18 08:16	12/28/18 10:17	7439-98-7	B

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-8 (B-2) 31.5'-34'**    **Lab ID: 60284822011**    Collected: 10/23/18 12:00    Received: 10/24/18 15:00    Matrix: Water

Comments: • The analyses completed on this sample are a DI Leachate.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>54.7</b>	ug/L	1.0	1	12/26/18 08:16	12/28/18 10:23	7439-98-7	

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-9 (B-3) 24'-25'**      **Lab ID: 60284822012**      Collected: 10/23/18 12:00      Received: 10/24/18 15:00      Matrix: Water

Comments: • The analyses completed on this sample are a DI Leachate.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>58.3</b>	ug/L	1.0	1	12/26/18 08:16	12/28/18 10:27	7439-98-7	

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-10 (B-4) 28'-29.5'**    **Lab ID: 60284822013**    Collected: 10/23/18 12:00    Received: 10/24/18 15:00    Matrix: Water

Comments: • The analyses completed on this sample are a DI Leachate.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>30.9</b>	ug/L	1.0	1	12/26/18 08:16	12/28/18 10:29	7439-98-7	

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-11 (B-6) 78.5'-79'**    **Lab ID: 60284822014**    Collected: 10/23/18 12:00    Received: 10/24/18 15:00    Matrix: Water

Comments: • The analyses completed on this sample are a DI Leachate.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>11.9</b>	ug/L	1.0	1	12/26/18 08:16	12/28/18 10:31	7439-98-7	

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-7 102'-104'**      **Lab ID: 60284822015**      Collected: 10/23/18 12:00      Received: 10/24/18 15:00      Matrix: Water

Comments: • The analyses completed on this sample are a DI Leachate.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>150</b>	ug/L	1.0	1	12/26/18 08:16	12/28/18 10:33	7439-98-7	

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## ANALYTICAL RESULTS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

**Sample: MW-FAA-11 61'-61.5'**      **Lab ID: 60284822016**      Collected: 10/23/18 12:00      Received: 10/24/18 15:00      Matrix: Water

Comments: • The analyses completed on this sample are a DI Leachate.

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>6020 MET ICPMS</b>								
Analytical Method: EPA 6020    Preparation Method: EPA 3010								
Molybdenum	<b>225</b>	ug/L	1.0	1	12/26/18 08:16	12/28/18 10:35	7439-98-7	M1

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

QC Batch: 560051 Analysis Method: EPA 6010  
 QC Batch Method: EPA 3050 Analysis Description: 6010 MET  
 Associated Lab Samples: 60284822001, 60284822002, 60284822003, 60284822004, 60284822005, 60284822007, 60284822009

METHOD BLANK: 2298528 Matrix: Solid  
 Associated Lab Samples: 60284822001, 60284822002, 60284822003, 60284822004, 60284822005, 60284822007, 60284822009

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Boron	mg/kg	<10.0	10.0	12/17/18 16:18	
Calcium	mg/kg	<10.0	10.0	12/18/18 13:14	

LABORATORY CONTROL SAMPLE: 2298529

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Boron	mg/kg	100	91.9	92	80-120	
Calcium	mg/kg	1000	971	97	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2298530 2298531

Parameter	Units	60289313002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Boron	mg/kg	ND	77.8	76.8	96.2	78.7	117	96	75-125	20	20	R1
Calcium	mg/kg	11700	778	768	6640	4390	-644	-946	75-125	41	20	M1

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

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### QUALITY CONTROL DATA

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

QC Batch:	560655	Analysis Method:	EPA 6010
QC Batch Method:	EPA 3010	Analysis Description:	6010 MET SPLP
Associated Lab Samples:	60284822001, 60284822002, 60284822003, 60284822004, 60284822005, 60284822007, 60284822009		

METHOD BLANK:	2301391	Matrix:	Water
Associated Lab Samples:	60284822001, 60284822002, 60284822003, 60284822004, 60284822005, 60284822007, 60284822009		

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Boron	mg/L	<0.10	0.10	12/18/18 15:25	
Calcium	mg/L	0.63	0.10	12/18/18 15:25	

LABORATORY CONTROL SAMPLE: 2301392

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Boron	mg/L	1	0.98	98	80-120	
Calcium	mg/L	10	10.4	104	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2301393 2301394

Parameter	Units	60289490006		2301394		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
Boron	mg/L	3.7	1	1	4.7	97	98	75-125	0	20	
Calcium	mg/L	300	10	10	301	8	-50	75-125	2	20 M1	

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### QUALITY CONTROL DATA

Project: JEC-FA2 LANDFILL  
Pace Project No.: 60284822

QC Batch: 561774 Analysis Method: EPA 6020  
QC Batch Method: EPA 3010 Analysis Description: 6020 MET  
Associated Lab Samples: 60284822010, 60284822011, 60284822012, 60284822013, 60284822014, 60284822015, 60284822016

METHOD BLANK: 2306167 Matrix: Water  
Associated Lab Samples: 60284822010, 60284822011, 60284822012, 60284822013, 60284822014, 60284822015, 60284822016

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Molybdenum	ug/L	1.1	1.0	12/28/18 10:15	

LABORATORY CONTROL SAMPLE: 2306168

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Molybdenum	ug/L	40	41.1	103	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2306169 2306170

Parameter	Units	60284822010 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Molybdenum	ug/L	3.0	40	40	43.8	43.7	102	102	75-125	0	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2306171 2306172

Parameter	Units	60284822016 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Molybdenum	ug/L	225	40	40	230	231	12	15	75-125	1	20	M1

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### REPORT OF LABORATORY ANALYSIS

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**QUALITY CONTROL DATA**

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

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QC Batch: 560153	Analysis Method: ASTM D2974
QC Batch Method: ASTM D2974	Analysis Description: Dry Weight/Percent Moisture
Associated Lab Samples: 60284822001, 60284822002, 60284822003, 60284822004, 60284822005, 60284822007, 60284822009	

---

METHOD BLANK: 2298990 Matrix: Solid  
Associated Lab Samples: 60284822001, 60284822002, 60284822003, 60284822004, 60284822005, 60284822007, 60284822009

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Percent Moisture	%	<0.50	0.50	12/14/18 12:05	

---

SAMPLE DUPLICATE: 2298991

Parameter	Units	60289462009 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	17.0	17.5	3	20	

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**REPORT OF LABORATORY ANALYSIS**

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## QUALIFIERS

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

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### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### LABORATORIES

PASI-K Pace Analytical Services - Kansas City

### ANALYTE QUALIFIERS

B Analyte was detected in the associated method blank.

H1 Analysis conducted outside the EPA method holding time.

H2 Extraction or preparation conducted outside EPA method holding time.

M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

R1 RPD value was outside control limits.

## REPORT OF LABORATORY ANALYSIS

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**QUALITY CONTROL DATA CROSS REFERENCE TABLE**

Project: JEC-FA2 LANDFILL

Pace Project No.: 60284822

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60284822001	MW-FAA-7 (B-1) 117.5'-120'	EPA 3050	560051	EPA 6010	560287
60284822002	MW-FAA-8 (B-2) 31.5'-34'	EPA 3050	560051	EPA 6010	560287
60284822003	MW-FAA-9 (B-3) 24'-25'	EPA 3050	560051	EPA 6010	560287
60284822004	MW-FAA-10 (B-4) 28'-29.5'	EPA 3050	560051	EPA 6010	560287
60284822005	MW-FAA-11 (B-6) 78.5'-79'	EPA 3050	560051	EPA 6010	560287
60284822007	MW-FAA-7 102'-104'	EPA 3050	560051	EPA 6010	560287
60284822009	MW-FAA-11 61'-61.5	EPA 3050	560051	EPA 6010	560287
60284822001	MW-FAA-7 (B-1) 117.5'-120'	EPA 3010	560655	EPA 6010	560723
60284822002	MW-FAA-8 (B-2) 31.5'-34'	EPA 3010	560655	EPA 6010	560723
60284822003	MW-FAA-9 (B-3) 24'-25'	EPA 3010	560655	EPA 6010	560723
60284822004	MW-FAA-10 (B-4) 28'-29.5'	EPA 3010	560655	EPA 6010	560723
60284822005	MW-FAA-11 (B-6) 78.5'-79'	EPA 3010	560655	EPA 6010	560723
60284822007	MW-FAA-7 102'-104'	EPA 3010	560655	EPA 6010	560723
60284822009	MW-FAA-11 61'-61.5	EPA 3010	560655	EPA 6010	560723
60284822001	MW-FAA-7 (B-1) 117.5'-120'	EPA 3010	560713	EPA 6020	561103
60284822002	MW-FAA-8 (B-2) 31.5'-34'	EPA 3010	560713	EPA 6020	561103
60284822003	MW-FAA-9 (B-3) 24'-25'	EPA 3010	560713	EPA 6020	561103
60284822004	MW-FAA-10 (B-4) 28'-29.5'	EPA 3010	560713	EPA 6020	561103
60284822005	MW-FAA-11 (B-6) 78.5'-79'	EPA 3010	560713	EPA 6020	561103
60284822007	MW-FAA-7 102'-104'	EPA 3010	560713	EPA 6020	561103
60284822009	MW-FAA-11 61'-61.5	EPA 3010	560713	EPA 6020	561103
60284822001	MW-FAA-7 (B-1) 117.5'-120'	EPA 3020	560745	EPA 6020	560909
60284822002	MW-FAA-8 (B-2) 31.5'-34'	EPA 3020	560745	EPA 6020	560909
60284822003	MW-FAA-9 (B-3) 24'-25'	EPA 3020	560745	EPA 6020	560909
60284822004	MW-FAA-10 (B-4) 28'-29.5'	EPA 3020	560745	EPA 6020	560909
60284822005	MW-FAA-11 (B-6) 78.5'-79'	EPA 3020	560745	EPA 6020	560909
60284822007	MW-FAA-7 102'-104'	EPA 3020	560745	EPA 6020	560909
60284822009	MW-FAA-11 61'-61.5	EPA 3020	560745	EPA 6020	560909
60284822010	MW-FAA-7 (B-1) 117.5'-120'	EPA 3010	561774	EPA 6020	562038
60284822011	MW-FAA-8 (B-2) 31.5'-34'	EPA 3010	561774	EPA 6020	562038
60284822012	MW-FAA-9 (B-3) 24'-25'	EPA 3010	561774	EPA 6020	562038
60284822013	MW-FAA-10 (B-4) 28'-29.5'	EPA 3010	561774	EPA 6020	562038
60284822014	MW-FAA-11 (B-6) 78.5'-79'	EPA 3010	561774	EPA 6020	562038
60284822015	MW-FAA-7 102'-104'	EPA 3010	561774	EPA 6020	562038
60284822016	MW-FAA-11 61'-61.5'	EPA 3010	561774	EPA 6020	562038
60284822001	MW-FAA-7 (B-1) 117.5'-120'	ASTM D2974	560153		
60284822002	MW-FAA-8 (B-2) 31.5'-34'	ASTM D2974	560153		
60284822003	MW-FAA-9 (B-3) 24'-25'	ASTM D2974	560153		
60284822004	MW-FAA-10 (B-4) 28'-29.5'	ASTM D2974	560153		
60284822005	MW-FAA-11 (B-6) 78.5'-79'	ASTM D2974	560153		
60284822007	MW-FAA-7 102'-104'	ASTM D2974	560153		
60284822009	MW-FAA-11 61'-61.5	ASTM D2974	560153		

**REPORT OF LABORATORY ANALYSIS**

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Sample Condition Upon Receipt

WO#: 60284822
Barcode with number 60284822

Client Name: Westar Energy

Courier: FedEx [ ] UPS [ ] VIA [ ] Clay [ ] PEX [ ] ECI [ ] Pace [ ] Xroads [ ] Client [x] Other [ ]

Tracking #: Pace Shipping Label Used? Yes [ ] No [x]

Custody Seal on Cooler/Box Present: Yes [ ] No [x] Seals intact: Yes [ ] No [x]

Packing Material: Bubble Wrap [ ] Bubble Bags [ ] Foam [ ] None [x] Other [ ]

Thermometer Used: T-298 Type of Ice: Wet Blue None

Cooler Temperature (°C): As-read 1.4 Corr. Factor 0.0 Corrected 1.4

Date and initials of person examining contents: 2/10/25/18

Temperature should be above freezing to 6°C

Table with 2 columns: Question/Field and Answer (checkboxes). Rows include Chain of Custody present, Samples arrived within holding time, Short Hold Time analyses, Rush Turn Around Time requested, Sufficient volume, Correct containers used, Pace containers used, Containers intact, Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?, Filtered volume received for dissolved tests?, Sample labels match COC: Date / time / ID / analyses, Samples contain multiple phases? Matrix: SL, Containers requiring pH preservation in compliance?, Cyanide water sample checks: Lead acetate strip turns dark?, Potassium iodide test strip turns blue/purple?, Trip Blank present, Headspace in VOA vials (>6mm), Samples from USDA Regulated Area: State: KS, Additional labels attached to 5035A / TX1005 vials in the field?

Client Notification/ Resolution: Copy COC to Client? Y / N Field Data Required? Y / N

Person Contacted: Date/Time:

Comments/ Resolution:

Project Manager Review:

REVIEWED
By hwilson at 10:33 am, 10/26/18

Date:





### CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Page: 1 of 1

Section A Required Client Information:		Section B Required Project Information:		Section C Invoice Information:	
Company: WESTAR ENERGY		Report To: Brandon Griffin		Attention: Jared Morrison	
Address: 818 Kansas Ave Topeka, KS 66612		Copy To: <u>Adam Kneeling</u>		Company Name: WESTAR ENERGY	
Email To: brandon.l.griffin@westarenergy.com		Purchase Order No.: 10JEC-000033150		Address: SEE SECTION A	
Phone: (785) 575-8135 Fax: _____		Project Name: <u>JEC-FAZ Landfill</u>		Pace Quote Reference: Heather Wilson, 913-563-1407	
Requested Due Date/TAT: 7 DAY		Project Number: <u>129778-022</u>		Pace Profile #: 9657, 2	
				<b>REGULATORY AGENCY</b>	
				<input checked="" type="checkbox"/> NPDES <input type="checkbox"/> GROUND WATER <input type="checkbox"/> DRINKING WATER <input type="checkbox"/> UST <input type="checkbox"/> RCRA <input type="checkbox"/> OTHER _____	
				<b>Site Location</b>	
				STATE: <u>KS</u>	

ITEM #	Section D Required Client Information	Valid Matrix Codes MATRIX CODE DRINKING WATER DW WATER WT WASTE WATER WW PRODUCT P SOIL/SOLID SL OIL OL WIPE WP AIR AR OTHER OT TISSUE TS	COLLECTED				SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives							Y/N	Requested Analysis Filtered (Y/N)	Residual Chlorine (Y/N)	
			DATE	TIME	DATE	TIME			UNPRESERVED	H2SO4	HNO3	HCl	NaOH	Na2S2O3	Methanol				Other
1	MW-FAA-7 (B-1)	117.5'-120'	10/23	1200															
2	MW-FAA-8 (B-2)	31.5'-34'	"	"	"	"													
3	MW-FAA-9 (B-3)	24'-25'	"	"	"	"													
4	MW-FAA-10 (B-4)	28'-29.5'	"	"	"	"													
5	MW-FAA-11 (B-6)	78.5'-79'	"	"	"	"													
6	MW-FAA-7	76.5'-77'	"	"	"	"													
7	MW-FAA-7	102'-104'	"	"	"	"													
8	MW-FAA-11	33'-33.5'	"	"	"	"													
9	MW-FAA-11	61'-61.5'	"	"	"	"													

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS
Hold remaining sample for possible additional total/SPLP analysis.	El. Fredrickson H&A	10/25/18	1500	W. Zupf / Pac	10/25/18	1500	1.4 Y N Y
Analysis is unknown at present. Hold samples pending Review							

SAMPLER NAME AND SIGNATURE		Temp in °C	Received on Ice (Y/N)	Custody Sealed/Coded (Y/N)	Samples Intact (Y/N)
PRINT Name of SAMPLER: <u>El. Fredrickson</u>					
SIGNATURE of SAMPLER: <u>[Signature]</u> DATE Signed (MM/DD/YY): <u>10/24/18</u>					

## **APPENDIX D**

### **Well Construction Details**

Project Jeffrey Energy Center Monitoring Well Installation  
 Location St. Mary's, Kansas  
 Client Westar Energy  
 Contractor Associated Drilling, Inc.  
 Driller Jeffery

**Well Diagram**

- Riser Pipe
- Screen
- Filter Sand
- Cuttings
- Grout
- Concrete
- Bentonite Seal








File No. 41938-300  
 Date Installed 21 Mar 2016  
 H&A Rep. C. Price  
 Location See Plan  
 Ground El. 1163.4  
 Datum NAVD 88

MONITORING WELL HA-LIB07-1-BOS1.GLB HA-TB-CORE+WELL-07-1.GDT C:\USERS\IRMOORE\HALEY\ALDRICH\DOCUMENTS\PROJECTS\WESTAR\JEC LOGS\JEC WELL INSTALLATION LOGS UPDATED 062116.GPJ Jun 22, 16

SOIL/ROCK		GRAPHIC	WELL DETAILS	DEPTH (ft.)	ELEVATION (ft.)	WELL CONSTRUCTION DETAILS	
CONDITIONS	DEPTH (ft.)						
						Type of protective cover	<u>Locking Lid</u>
	0			0.0	1163.4	Height of Guard Pipe above ground surface	<u>2.5 ft</u>
<b>TOPSOIL</b>	2.0			3.0	1160.4	Height of top of riser above ground surface	<u>2.0 ft</u>
<b>LIMESTONE</b>						Type of protective casing	<u>Guard Pipe</u>
						Length	<u>5.0 ft</u>
						Inside diameter	<u>4.0 in.</u>
						Depth of bottom of Guard Pipe	<u>2.5 ft</u>
<b>SHALE AND LIMESTONE</b>	10.0					Type of riser pipe	<u>Schedule 40 PVC</u>
						Inside diameter of riser pipe	<u>2.0 in.</u>
						Depth of bottom of riser pipe	<u>22.0 ft</u>
<b>LIMESTONE</b>	15.0					<b>Type of Seals</b>	<b>Top of Seal (ft)</b>
						<b>Concrete</b>	<u>0.0 ft</u>
						<b>Bentonite</b>	<u>3.0 ft</u>
						<b>Bentonite</b>	<u>33.0 ft</u>
				20.0	1143.4	<b>Thickness (ft)</b>	<u>3.0 ft</u>
<b>LIMESTONE WITH SHALE</b>	20.0			22.0	1141.4	Diameter of borehole	<u>6.0 in.</u>
						Depth to top of well screen	<u>22.0 ft</u>
<b>SHALE AND LIMESTONE</b>	25.0					Type of screen	<u>Machine slotted Sch 40 PVC</u>
						Screen gauge or size of openings	<u>0.010 in.</u>
						Diameter of screen	<u>2.0 in.</u>
<b>LIMESTONE</b>	30.0					Type of Backfill around Screen	<u>8-12 Silica Sand</u>
				32.0	1131.4	Depth to bottom of well screen	<u>32 ft</u>
				33.0	1130.4	Bottom of silt trap	<u>NA</u>
<b>SHALE</b>	33.0			35.0	1128.4	Depth of bottom of borehole	<u>35.0 ft</u>

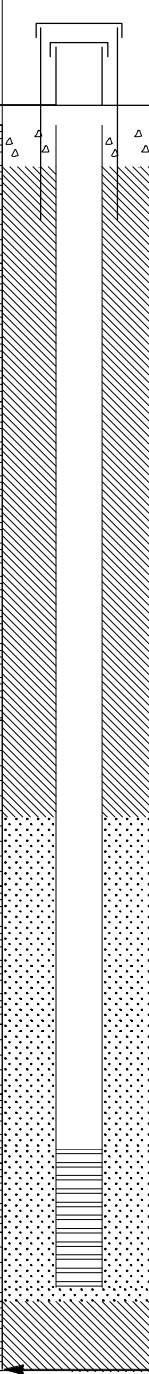
Project Jeffrey Energy Center Monitoring Well Installation  
 Location St. Mary's, Kansas  
 Client Westar Energy  
 Contractor Associated Drilling, Inc.  
 Driller Jeffery

**Well Diagram**

-  Riser Pipe
-  Screen
-  Filter Sand
-  Cuttings
-  Grout
-  Concrete
-  Bentonite Seal

File No. 41938-300  
 Date Installed 21 Mar 2016  
 H&A Rep. C. Price  
 Location See Plan  
 Ground El. 1211.6  
 Datum NAVD 88








Jun 22, 16  
 C:\USERS\MOORE\HALEY\ALDRICH\DOCUMENTS\PROJECTS\WESTAR\JEC LOGS\JEC WELL INSTALLATION LOGS UPDATED 062116.GPJ  
 HA-TB-CORE+WELL-07-1.GDT  
 HA-LIB07-1-BOS1.GLB  
 MONITORING WELL

SOIL/ROCK		GRAPHIC	WELL DETAILS	DEPTH (ft.)	ELEVATION (ft.)	WELL CONSTRUCTION DETAILS	
CONDITIONS	DEPTH (ft.)						
				0.0	1211.6	Type of protective cover	<u>Locking Lid</u>
				3.0	1208.6	Height of Guard Pipe above ground surface	<u>2.5 ft</u>
<b>SHALE</b>	5.0					Height of top of riser above ground surface	<u>2.0 ft</u>
<b>LIMESTONE</b>	10.0					Type of protective casing	<u>Guard Pipe</u>
<b>SHALE WITH LIMESTONE</b>	20.0					Length	<u>5.0 ft</u>
						Inside diameter	<u>4.0 in.</u>
						Depth of bottom of Guard Pipe	<u>2.5 ft</u>
<b>SHALE</b>	30.0					Type of riser pipe	<u>Schedule 40 PVC</u>
						Inside diameter of riser pipe	<u>2.0 in.</u>
						Depth of bottom of riser pipe	<u>74.0 ft</u>
						<b>Type of Seals</b>	<b>Top of Seal (ft)</b>
						<u>Concrete</u>	<u>0.0 ft</u>
						<u>Bentonite</u>	<u>3.0 ft</u>
						<u>Bentonite</u>	<u>85.0 ft</u>
<b>LIMESTONE</b>	50.0			50.0	1161.6	Diameter of borehole	<u>6.0 in.</u>
						Depth to top of well screen	<u>74.0 ft</u>
<b>SHALE</b>	60.0					Type of screen	<u>Machine slotted Sch 40 PVC</u>
<b>LIMESTONE</b>	70.0					Screen gauge or size of openings	<u>0.010 in.</u>
<b>SHALE</b>	75.0			74.0	1137.6	Diameter of screen	<u>2.0 in.</u>
<b>SHALE WITH LIMESTONE</b>	80.0					Type of Backfill around Screen	<u>8-12 Silica Sand</u>
<b>LIMESTONE WITH SHALE</b>	85.0			84.0	1127.6	Depth to bottom of well screen	<u>84 ft</u>
<b>SHALE</b>	90.0			85.0	1126.6	Bottom of silt trap	<u>NA</u>
				90.0	1121.6	Depth of bottom of borehole	<u>90.0 ft</u>



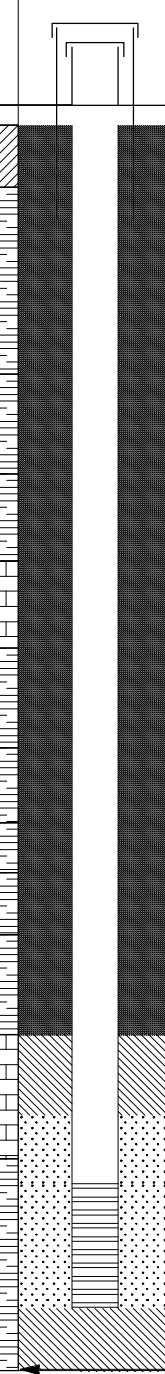
Project Jeffrey Energy Center Temporary Piezometer Installation  
 Location St. Mary's, Kansas  
 Client Westar Energy  
 Contractor Associated Drilling, Inc.  
 Driller W. Pressley

**Well Diagram**

-  Riser Pipe
-  Screen
-  Filter Sand
-  Cuttings
-  Grout
-  Concrete
-  Bentonite Seal








File No. 41938-003  
 Date Installed 04 Aug 2015  
 H&A Rep. D. Andersen  
 Location See Plan  
 Ground El. 1248.3  
 Datum NAVD 88

MONITORING WELL HA-LIB07-1-BOS1-GLB HA-TB+CORE+WELL-07-1-GDT C:\USERS\MOORE\HALEY\ALDRICH\DOCUMENTS\PROJECTS\WESTAR\JEC LOGS\JEC PIEZO LOGS.GPJ Jun 22, 16

SOIL/ROCK		GRAPHIC	WELL DETAILS	DEPTH (ft.)	ELEVATION (ft.)	WELL CONSTRUCTION DETAILS		
CONDITIONS	DEPTH (ft.)							
				0.0	1248.3	Type of protective cover	<u>Locking Lid</u>	
						Height of Guard Pipe above ground surface	<u>2.5 ft</u>	
						Height of top of riser above ground surface	<u>2.0 ft</u>	
						Type of protective casing	<u>Guard Pipe</u>	
						Length	<u>5.0 ft</u>	
						Inside diameter	<u>4.0 in.</u>	
						Depth of bottom of Guard Pipe	<u>2.5 ft</u>	
						Type of riser pipe	<u>Schedule 40 PVC</u>	
						Inside diameter of riser pipe	<u>2.0 in.</u>	
						Depth of bottom of riser pipe	<u>85.0 ft</u>	
						<u>Type of Seals</u>	<u>Top of Seal (ft)</u>	<u>Thickness (ft)</u>
						<u>Grout</u>	<u>0.0 ft</u>	<u>73.0 ft</u>
						<u>Bentonite</u>	<u>73.0 ft</u>	<u>6.5 ft</u>
						<u>Bentonite</u>	<u>95.0 ft</u>	<u>5.0 ft</u>
						Diameter of borehole	<u>4.5 in.</u>	
						Depth to top of well screen	<u>85.0 ft</u>	
						Type of screen	<u>Machine slotted Sch 40 PVC</u>	
						Screen gauge or size of openings	<u>0.020 in.</u>	
						Diameter of screen	<u>2.0 in.</u>	
						Type of Backfill around Screen	<u>8-12 Silica Sand</u>	
						Depth to bottom of well screen	<u>95 ft</u>	
						Bottom of silt trap	<u>NA</u>	
						Depth of bottom of borehole	<u>100.0 ft</u>	
	<b>FAT CLAY W/ GRAVEL</b>							
	<b>SHALE</b>							
	<b>INTERBEDDED SHALE AND LIMESTONE</b>							
	<b>SHALE</b>							
	<b>LIMESTONE</b>							
	<b>SHALE</b>							
	<b>INTERBEDDED SHALE AND LIMESTONE</b>							
	<b>SHALE</b>							
	<b>INTERBEDDED SHALE AND LIMESTONE</b>							
	<b>SHALE</b>							
	<b>LIMESTONE</b>							
	<b>SHALE</b>							
	<b>LIMESTONE</b>							
	<b>SHALE</b>							

Project Jeffrey Energy Center Monitoring Well Installation  
 Location St. Mary's, Kansas  
 Client Westar Energy  
 Contractor Terracon  
 Driller Jeffery

**Well Diagram**

-  Riser Pipe
-  Screen
-  Filter Sand
-  Cuttings
-  Grout
-  Concrete
-  Bentonite Seal

File No. 41938-110  
 Date Installed 16 Jun 2017  
 H&A Rep. K. Ford  
 Location See Plan  
 Ground El. 1159.7  
 Datum NAVD 88

MONITORING WELL - HA-LIB07-1-BOS1.GLB HA-TB+CORE+WELL-07-1.GDT \\HALEY\ALDRICH\COMMON\PROJECTS\WESTAR\JEFFREY ENERGY CENTER (JEC)\PROJECT DATA\GINT\JEC WELL INSTALLATION LOGS UPDATED 062316.GPJ 7 Jul 17

SOIL/ROCK		GRAPHIC	WELL DETAILS	DEPTH (ft.)	ELEVATION (ft.)	WELL CONSTRUCTION DETAILS
CONDITIONS	DEPTH (ft.)					
				0.0	1159.7	Type of protective cover <u>Locking Lid</u>
				1.5	1158.2	Height of Guard Pipe above ground surface <u>3.0 ft</u>
						Height of top of riser above ground surface <u>2.5 ft</u>
						Type of protective casing <u>Guard Pipe</u>
						Length <u>5.0 ft</u>
						Inside diameter <u>4.0 in.</u>
						Depth of bottom of Guard Pipe <u>2.0 ft</u>
						Type of riser pipe <u>Schedule 40 PVC</u>
						Inside diameter of riser pipe <u>2.0 in.</u>
						Depth of bottom of riser pipe <u>30.3 ft</u>
						<b>Type of Seals</b> <b>Top of Seal (ft)</b> <b>Thickness (ft)</b>
						<u>Concrete</u> <u>0.0 ft</u> <u>1.5 ft</u>
						<u>Bentonite</u> <u>1.5 ft</u> <u>22.5 ft</u>
						<u>Bentonite</u> <u>24.0 ft</u> <u>1.0 ft</u>
				25.0	1134.7	Diameter of borehole <u>6.0 in.</u>
						Depth to top of well screen <u>30.3 ft</u>
						Type of screen <u>Machine slotted Sch 40 PVC</u>
						Screen gauge or size of openings <u>0.010 in.</u>
						Diameter of screen <u>2.0 in.</u>
						Type of Backfill around Screen <u>8-12 Silica Sand</u>
						Depth to bottom of well screen <u>40.3 ft</u>
				40.3	1119.4	Bottom of silt trap <u>NA</u>
				41.0	1118.7	Depth of bottom of borehole <u>41.0 ft</u>

**FILL**

**LIMESTONE**

**SHALE**

**LIMESTONE**

**SHALE**

**LIMESTONE**

**SHALE**

**LIMESTONE**

**LIMESTONE WITH SHALE**

**LIMESTONE**



November 4, 2022  
File No. 129778

TO: Evergy Kansas Central, Inc.  
Jared Morrison – Director, Water and Waste Programs

FROM: Haley & Aldrich, Inc.  
Steven F. Putrich, P.E., Senior Associate – Engineering Principal  
Mark Nicholls, P.G., Senior Associate – Senior Hydrogeologist

SUBJECT: 2019 Annual Groundwater Monitoring and Corrective Action Report Addendum  
Evergy Kansas Central, Inc.  
Jeffrey Energy Center  
Fly Ash Landfill

The Evergy Kansas Central, Inc. (Evergy) Fly Ash Landfill (FAL) at the Jeffrey Energy Center (JEC) is subject to the groundwater monitoring and corrective action requirements described under Code of Federal Regulations Title 40 (40 CFR) §257.90 through §257.98 (Rule). An Annual Groundwater Monitoring and Corrective Action (GWMCA) Report documenting the activities completed in 2019 for the FAL was completed and placed in the facility's operating record on January 31, 2020, as required by the Rule. The Annual GWMCA Report contained the specific information listed in 40 CFR §257.90(e).

This report addendum has been prepared to supplement the operating record in recognition of comments received by Evergy from the U.S. Environmental Protection Agency (USEPA) on January 11, 2022. In addition to the information listed in 40 CFR §257.90(e), the USEPA indicated in their comments that the GWMCA Report should contain:

- Results of laboratory analysis of groundwater or other environmental media samples for the presence of constituents of Appendices III and IV to 40 CFR part 257 (or of other constituents, such as those supporting characterization of site conditions that may ultimately affect a remedy);
- Required statistical analyses performed on those [laboratory analysis] results;
- Measured groundwater elevations; and
- Calculated groundwater flow rate and direction.

While this information is not specifically referred to in 40 CFR §257.90(e) for inclusion in the GWMCA Report, it has been routinely collected and maintained in Evergy's files and is being provided in the attachments to this addendum. The applicable laboratory analysis reports for 2019 sampling events are included in Attachment 1, and a discussion of the applicable statistical analyses completed in 2019 are included in Attachment 2 of this addendum. For each of the 2019 sampling events, the measured groundwater elevations, with calculated groundwater flow rates and directions, have been included in Attachment 3.

The Attachments to this addendum are described below:

- Attachment 1 – Laboratory Analytical Reports: Includes laboratory data packages with supporting information such as case narrative, sample and method summary, analytical results, quality control, and chain-of-custody documentation. The laboratory data packages for the sampling events completed in March, June, and September 2019 are provided.
- Attachment 2 – Statistical Analyses: Includes a discussion of the statistical analyses utilized along with a table summarizing the statistical outputs (e.g., frequency of detection, maximum detection, variance, standard deviation, coefficient of variance, outlier tests, trends, upper and lower confidence limits, and comparison against Groundwater Protection Standards), and supporting backup for statistical analyses completed in 2019. Statistical analyses completed in 2019 included:
  - Overview of the January 2019 statistical analyses for data obtained in the September 2018 sampling event; and
  - Overview of the July 2019 statistical analyses for data obtained in the March 2019 sampling event.
- Attachment 3 – Revised Groundwater Potentiometric Maps: Includes the measured groundwater elevations at each well and the generalized groundwater flow direction and calculated flow rate. Maps for the sampling events completed in March, June, and September 2019 are provided.



**ATTACHMENT 1**  
**Laboratory Analytical Reports**

**ATTACHMENT 1-1**  
**March 2019 Sampling Event**  
**Laboratory Analytical Report**

April 08, 2019

Brandon Griffin  
Westar Energy  
818 S. Kansas Ave  
Topeka, KS 66612

RE: Project: JEC FAA CCR  
Pace Project No.: 60298176

Dear Brandon Griffin:

Enclosed are the analytical results for sample(s) received by the laboratory on March 28, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Heather Wilson  
heather.wilson@pacelabs.com  
1(913)563-1407  
Project Manager

Enclosures

cc: HEATH HORYNA, WESTAR ENERGY  
Andrew Hare, Westar Energy  
Adam Kneeling, Haley & Aldrich, Inc.  
JARED MORRISON, WESTAR ENERGY  
Melissa Michels, Westar Energy  
JD Schlegel, KCP&L & Westar



## REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,  
without the written consent of Pace Analytical Services, LLC.

## CERTIFICATIONS

Project: JEC FAA CCR

Pace Project No.: 60298176

---

### **Kansas Certification IDs**

9608 Loiret Boulevard, Lenexa, KS 66219

Missouri Certification Number: 10090

Arkansas Drinking Water

WY STR Certification #: 2456.01

Arkansas Certification #: 18-016-0

Arkansas Drinking Water

Illinois Certification #: 004455

Iowa Certification #: 118

Kansas/NELAP Certification #: E-10116 / E10426

Louisiana Certification #: 03055

Nevada Certification #: KS000212018-1

Oklahoma Certification #: 9205/9935

Texas Certification #: T104704407-18-11

Utah Certification #: KS000212018-8

Kansas Field Laboratory Accreditation: # E-92587

Missouri Certification: 10070

Missouri Certification Number: 10090

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## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: JEC FAA CCR

Pace Project No.: 60298176

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60298176001	FAA-5-032619	Water	03/26/19 09:00	03/28/19 06:15
60298176002	FAA-4-032619	Water	03/26/19 10:21	03/28/19 06:15
60298176003	FAA-3-032619	Water	03/26/19 11:17	03/28/19 06:15
60298176004	FAA-6-032619	Water	03/26/19 12:21	03/28/19 06:15

## REPORT OF LABORATORY ANALYSIS

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### SAMPLE ANALYTE COUNT

Project: JEC FAA CCR

Pace Project No.: 60298176

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60298176001	FAA-5-032619	EPA 200.7	EMR	7	PASI-K
		EPA 200.8	JGP	7	PASI-K
		EPA 245.1	LRS	1	PASI-K
		SM 2540C	LDF	1	PASI-K
		SM 4500-H+B	ZMH	1	PASI-K
		EPA 300.0	MGS, WNM	3	PASI-K
		EPA 200.7	EMR	7	PASI-K
60298176002	FAA-4-032619	EPA 200.8	JGP	7	PASI-K
		EPA 245.1	LRS	1	PASI-K
		SM 2540C	LDF	1	PASI-K
		SM 4500-H+B	ZMH	1	PASI-K
		EPA 300.0	WNM	3	PASI-K
		EPA 200.7	EMR	7	PASI-K
		EPA 200.8	JGP	7	PASI-K
60298176003	FAA-3-032619	EPA 245.1	LRS	1	PASI-K
		SM 2540C	LDF	1	PASI-K
		SM 4500-H+B	ZMH	1	PASI-K
		EPA 300.0	WNM	3	PASI-K
		EPA 200.7	EMR	7	PASI-K
		EPA 200.8	JGP	7	PASI-K
		EPA 245.1	LRS	1	PASI-K
60298176004	FAA-6-032619	SM 2540C	LDF	1	PASI-K
		SM 4500-H+B	ZMH	1	PASI-K
		EPA 300.0	MGS	3	PASI-K
		EPA 200.7	EMR	7	PASI-K
		EPA 200.8	JGP	7	PASI-K
		EPA 245.1	LRS	1	PASI-K
		SM 2540C	LDF	1	PASI-K

### REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60298176

---

**Method:** EPA 200.7

**Description:** 200.7 Metals, Total

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

**General Information:**

4 samples were analyzed for EPA 200.7. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 200.7 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60298176

---

**Method:** EPA 200.8

**Description:** 200.8 MET ICPMS

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

**General Information:**

4 samples were analyzed for EPA 200.8. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 200.8 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Internal Standards:**

All internal standards were within QC limits with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60298176

---

**Method:** EPA 245.1

**Description:** 245.1 Mercury

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

**General Information:**

4 samples were analyzed for EPA 245.1. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 245.1 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60298176

---

**Method:** SM 2540C

**Description:** 2540C Total Dissolved Solids

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

**General Information:**

4 samples were analyzed for SM 2540C. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Duplicate Sample:**

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60298176

---

**Method:** SM 4500-H+B

**Description:** 4500H+ pH, Electrometric

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

### General Information:

4 samples were analyzed for SM 4500-H+B. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

### Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

H6: Analysis initiated outside of the 15 minute EPA required holding time.

- FAA-3-032619 (Lab ID: 60298176003)
- FAA-4-032619 (Lab ID: 60298176002)
- FAA-5-032619 (Lab ID: 60298176001)
- FAA-6-032619 (Lab ID: 60298176004)

### Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

### Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

### Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

### Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

### Additional Comments:

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60298176

---

**Method:** EPA 300.0

**Description:** 300.0 IC Anions 28 Days

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

### General Information:

4 samples were analyzed for EPA 300.0. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

### Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

### Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

### Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

### Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 577463

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60297982001,60298451001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2369464)
  - Sulfate
- MSD (Lab ID: 2369465)
  - Sulfate

QC Batch: 577678

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60298156001,60298258008

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2370637)
  - Chloride
- MS (Lab ID: 2370639)
  - Fluoride
- MSD (Lab ID: 2370638)
  - Chloride

QC Batch: 577711

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60298176003

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2370962)
  - Sulfate
- MSD (Lab ID: 2370963)
  - Sulfate

### Additional Comments:

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60298176

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**Method:** EPA 300.0

**Description:** 300.0 IC Anions 28 Days

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

Analyte Comments:

QC Batch: 577463

E: Analyte concentration exceeded the calibration range. The reported result is estimated.

- MS (Lab ID: 2369464)
- Sulfate

QC Batch: 577678

E: Analyte concentration exceeded the calibration range. The reported result is estimated.

- MS (Lab ID: 2370637)
- Chloride

This data package has been reviewed for quality and completeness and is approved for release.

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## ANALYTICAL RESULTS

Project: JEC FAA CCR

Pace Project No.: 60298176

Sample: <b>FAA-5-032619</b>		Lab ID: <b>60298176001</b>	Collected: 03/26/19 09:00	Received: 03/28/19 06:15	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7						
Barium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	04/03/19 10:11	04/04/19 10:31	7440-39-3	
Beryllium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 10:11	04/04/19 10:31	7440-41-7	
Boron, Total Recoverable	<b>1.1</b>	mg/L	0.10	1	04/03/19 10:11	04/04/19 10:31	7440-42-8	
Calcium, Total Recoverable	<b>294</b>	mg/L	0.20	1	04/03/19 10:11	04/04/19 10:31	7440-70-2	
Chromium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	04/03/19 10:11	04/04/19 10:31	7440-47-3	
Lead, Total Recoverable	<b>&lt;0.010</b>	mg/L	0.010	1	04/03/19 10:11	04/04/19 10:31	7439-92-1	
Lithium	<b>0.082</b>	mg/L	0.010	1	04/03/19 10:11	04/04/19 10:31	7439-93-2	
<b>200.8 MET ICPMS</b>		Analytical Method: EPA 200.8 Preparation Method: EPA 200.8						
Antimony, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:38	7440-36-0	
Arsenic, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:38	7440-38-2	
Cadmium, Total Recoverable	<b>&lt;0.00050</b>	mg/L	0.00050	1	04/03/19 12:09	04/04/19 16:38	7440-43-9	
Cobalt, Total Recoverable	<b>0.0022</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:38	7440-48-4	
Molybdenum, Total Recoverable	<b>0.024</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:38	7439-98-7	
Selenium, Total Recoverable	<b>0.0027</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:38	7782-49-2	
Thallium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:38	7440-28-0	
<b>245.1 Mercury</b>		Analytical Method: EPA 245.1 Preparation Method: EPA 245.1						
Mercury	<b>&lt;0.00020</b>	mg/L	0.00020	1	03/29/19 10:48	04/01/19 10:22	7439-97-6	
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C						
Total Dissolved Solids	<b>1770</b>	mg/L	5.0	1		04/01/19 11:06		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B						
pH at 25 Degrees C	<b>7.1</b>	Std. Units	0.10	1		04/04/19 09:59		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0						
Chloride	<b>127</b>	mg/L	10.0	10		04/06/19 15:18	16887-00-6	
Fluoride	<b>0.53</b>	mg/L	0.20	1		04/06/19 05:27	16984-48-8	
Sulfate	<b>900</b>	mg/L	100	100		04/06/19 15:34	14808-79-8	

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: JEC FAA CCR

Pace Project No.: 60298176

Sample: <b>FAA-4-032619</b>	Lab ID: <b>60298176002</b>	Collected: 03/26/19 10:21	Received: 03/28/19 06:15	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>								
Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Barium, Total Recoverable	<b>0.051</b>	mg/L	0.0050	1	04/03/19 10:11	04/04/19 10:33	7440-39-3	
Beryllium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 10:11	04/04/19 10:33	7440-41-7	
Boron, Total Recoverable	<b>0.88</b>	mg/L	0.10	1	04/03/19 10:11	04/04/19 10:33	7440-42-8	
Calcium, Total Recoverable	<b>180</b>	mg/L	0.20	1	04/03/19 10:11	04/04/19 10:33	7440-70-2	
Chromium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	04/03/19 10:11	04/04/19 10:33	7440-47-3	
Lead, Total Recoverable	<b>&lt;0.010</b>	mg/L	0.010	1	04/03/19 10:11	04/04/19 10:33	7439-92-1	
Lithium	<b>0.019</b>	mg/L	0.010	1	04/03/19 10:11	04/04/19 10:33	7439-93-2	
<b>200.8 MET ICPMS</b>								
Analytical Method: EPA 200.8 Preparation Method: EPA 200.8								
Antimony, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:41	7440-36-0	
Arsenic, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:41	7440-38-2	
Cadmium, Total Recoverable	<b>&lt;0.00050</b>	mg/L	0.00050	1	04/03/19 12:09	04/04/19 16:41	7440-43-9	
Cobalt, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:41	7440-48-4	
Molybdenum, Total Recoverable	<b>0.0072</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:41	7439-98-7	
Selenium, Total Recoverable	<b>0.0013</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:41	7782-49-2	
Thallium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:41	7440-28-0	
<b>245.1 Mercury</b>								
Analytical Method: EPA 245.1 Preparation Method: EPA 245.1								
Mercury	<b>&lt;0.00020</b>	mg/L	0.00020	1	03/29/19 10:48	04/01/19 10:24	7439-97-6	
<b>2540C Total Dissolved Solids</b>								
Analytical Method: SM 2540C								
Total Dissolved Solids	<b>1110</b>	mg/L	5.0	1		04/01/19 11:06		
<b>4500H+ pH, Electrometric</b>								
Analytical Method: SM 4500-H+B								
pH at 25 Degrees C	<b>7.3</b>	Std. Units	0.10	1		04/04/19 10:01		H6
<b>300.0 IC Anions 28 Days</b>								
Analytical Method: EPA 300.0								
Chloride	<b>68.5</b>	mg/L	10.0	10		04/06/19 16:05	16887-00-6	
Fluoride	<b>0.33</b>	mg/L	0.20	1		04/06/19 15:49	16984-48-8	
Sulfate	<b>479</b>	mg/L	50.0	50		04/06/19 16:21	14808-79-8	

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## ANALYTICAL RESULTS

Project: JEC FAA CCR

Pace Project No.: 60298176

Sample: <b>FAA-3-032619</b>	Lab ID: <b>60298176003</b>	Collected: 03/26/19 11:17	Received: 03/28/19 06:15	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7						
Barium, Total Recoverable	<b>0.036</b>	mg/L	0.0050	1	04/03/19 10:11	04/04/19 10:35	7440-39-3	
Beryllium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 10:11	04/04/19 10:35	7440-41-7	
Boron, Total Recoverable	<b>0.54</b>	mg/L	0.10	1	04/03/19 10:11	04/04/19 10:35	7440-42-8	
Calcium, Total Recoverable	<b>366</b>	mg/L	0.20	1	04/03/19 10:11	04/04/19 10:35	7440-70-2	
Chromium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	04/03/19 10:11	04/04/19 10:35	7440-47-3	
Lead, Total Recoverable	<b>&lt;0.010</b>	mg/L	0.010	1	04/03/19 10:11	04/04/19 10:35	7439-92-1	
Lithium	<b>0.014</b>	mg/L	0.010	1	04/03/19 10:11	04/04/19 10:35	7439-93-2	
<b>200.8 MET ICPMS</b>		Analytical Method: EPA 200.8 Preparation Method: EPA 200.8						
Antimony, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:44	7440-36-0	
Arsenic, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:44	7440-38-2	
Cadmium, Total Recoverable	<b>&lt;0.00050</b>	mg/L	0.00050	1	04/03/19 12:09	04/04/19 16:44	7440-43-9	
Cobalt, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:44	7440-48-4	
Molybdenum, Total Recoverable	<b>0.0039</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:44	7439-98-7	
Selenium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:44	7782-49-2	
Thallium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:44	7440-28-0	
<b>245.1 Mercury</b>		Analytical Method: EPA 245.1 Preparation Method: EPA 245.1						
Mercury	<b>&lt;0.00020</b>	mg/L	0.00020	1	03/29/19 10:48	04/01/19 10:26	7439-97-6	
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C						
Total Dissolved Solids	<b>1990</b>	mg/L	5.0	1		04/01/19 11:06		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B						
pH at 25 Degrees C	<b>7.2</b>	Std. Units	0.10	1		04/04/19 10:02		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0						
Chloride	<b>176</b>	mg/L	10.0	10		04/06/19 16:53	16887-00-6	
Fluoride	<b>0.37</b>	mg/L	0.20	1		04/06/19 16:37	16984-48-8	
Sulfate	<b>1090</b>	mg/L	100	100		04/07/19 15:20	14808-79-8	M1

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## ANALYTICAL RESULTS

Project: JEC FAA CCR

Pace Project No.: 60298176

Sample: <b>FAA-6-032619</b>		Lab ID: <b>60298176004</b>	Collected: 03/26/19 12:21	Received: 03/28/19 06:15	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7						
Barium, Total Recoverable	<b>0.033</b>	mg/L	0.0050	1	04/03/19 10:11	04/04/19 10:42	7440-39-3	
Beryllium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 10:11	04/04/19 10:42	7440-41-7	
Boron, Total Recoverable	<b>1.5</b>	mg/L	0.10	1	04/03/19 10:11	04/04/19 10:42	7440-42-8	
Calcium, Total Recoverable	<b>147</b>	mg/L	0.20	1	04/03/19 10:11	04/04/19 10:42	7440-70-2	
Chromium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	04/03/19 10:11	04/04/19 10:42	7440-47-3	
Lead, Total Recoverable	<b>&lt;0.010</b>	mg/L	0.010	1	04/03/19 10:11	04/04/19 10:42	7439-92-1	
Lithium	<b>0.014</b>	mg/L	0.010	1	04/03/19 10:11	04/04/19 10:42	7439-93-2	
<b>200.8 MET ICPMS</b>		Analytical Method: EPA 200.8 Preparation Method: EPA 200.8						
Antimony, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:50	7440-36-0	
Arsenic, Total Recoverable	<b>0.0037</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:50	7440-38-2	
Cadmium, Total Recoverable	<b>&lt;0.00050</b>	mg/L	0.00050	1	04/03/19 12:09	04/04/19 16:50	7440-43-9	
Cobalt, Total Recoverable	<b>0.0017</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:50	7440-48-4	
Molybdenum, Total Recoverable	<b>0.22</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:50	7439-98-7	
Selenium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:50	7782-49-2	
Thallium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	04/03/19 12:09	04/04/19 16:50	7440-28-0	
<b>245.1 Mercury</b>		Analytical Method: EPA 245.1 Preparation Method: EPA 245.1						
Mercury	<b>&lt;0.00020</b>	mg/L	0.00020	1	03/29/19 10:48	04/01/19 10:28	7439-97-6	
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C						
Total Dissolved Solids	<b>1560</b>	mg/L	5.0	1		04/01/19 11:06		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B						
pH at 25 Degrees C	<b>7.4</b>	Std. Units	0.10	1		04/04/19 10:03		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0						
Chloride	<b>80.4</b>	mg/L	10.0	10		04/05/19 18:36	16887-00-6	
Fluoride	<b>0.62</b>	mg/L	0.20	1		04/05/19 18:23	16984-48-8	
Sulfate	<b>972</b>	mg/L	50.0	50		04/05/19 18:49	14808-79-8	

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: JEC FAA CCR

Pace Project No.: 60298176

QC Batch: 576271

Analysis Method: EPA 245.1

QC Batch Method: EPA 245.1

Analysis Description: 245.1 Mercury

Associated Lab Samples: 60298176001, 60298176002, 60298176003, 60298176004

METHOD BLANK: 2364322

Matrix: Water

Associated Lab Samples: 60298176001, 60298176002, 60298176003, 60298176004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	mg/L	<0.00020	0.00020	04/01/19 10:06	

LABORATORY CONTROL SAMPLE: 2364323

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/L	0.005	0.0050	100	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2364324 2364325

Parameter	Units	60298157005		MSD		MS		MSD		% Rec Limits	Max RPD	Qual
		Result	Spike Conc.	Spike Conc.	MS Result	MSD Result	% Rec	% Rec				
Mercury	mg/L	<0.00020	0.005	0.005	0.0047	0.0045	93	88	70-130	5	20	

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### QUALITY CONTROL DATA

Project: JEC FAA CCR  
Pace Project No.: 60298176

QC Batch: 576952 Analysis Method: EPA 200.7  
QC Batch Method: EPA 200.7 Analysis Description: 200.7 Metals, Total  
Associated Lab Samples: 60298176001, 60298176002, 60298176003, 60298176004

METHOD BLANK: 2367278 Matrix: Water  
Associated Lab Samples: 60298176001, 60298176002, 60298176003, 60298176004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Barium	mg/L	<0.0050	0.0050	04/04/19 10:08	
Beryllium	mg/L	<0.0010	0.0010	04/04/19 10:08	
Boron	mg/L	<0.10	0.10	04/04/19 10:08	
Calcium	mg/L	<0.20	0.20	04/04/19 10:08	
Chromium	mg/L	<0.0050	0.0050	04/04/19 10:08	
Lead	mg/L	<0.010	0.010	04/04/19 10:08	
Lithium	mg/L	<0.010	0.010	04/04/19 10:08	

LABORATORY CONTROL SAMPLE: 2367279

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Barium	mg/L	1	1.0	105	85-115	
Beryllium	mg/L	1	1.1	105	85-115	
Boron	mg/L	1	0.99	99	85-115	
Calcium	mg/L	10	10.7	107	85-115	
Chromium	mg/L	1	1.0	102	85-115	
Lead	mg/L	1	1.0	102	85-115	
Lithium	mg/L	1	1.0	102	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2367280 2367281

Parameter	Units	60298157004		2367281		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
Barium	mg/L	0.091	1	1	1.1	1.1	102	70-130	2	20	
Beryllium	mg/L	<0.0010	1	1	1.0	1.0	102	70-130	2	20	
Boron	mg/L	0.39	1	1	1.4	1.4	99	70-130	3	20	
Calcium	mg/L	112	10	10	122	125	97	70-130	2	20	
Chromium	mg/L	<0.0050	1	1	0.98	1.0	98	70-130	2	20	
Lead	mg/L	<0.010	1	1	0.96	0.98	96	70-130	2	20	
Lithium	mg/L	<0.010	1	1	1.0	1.0	101	70-130	2	20	

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### QUALITY CONTROL DATA

Project: JEC FAA CCR  
Pace Project No.: 60298176

QC Batch: 577038 Analysis Method: EPA 200.8  
QC Batch Method: EPA 200.8 Analysis Description: 200.8 MET  
Associated Lab Samples: 60298176001, 60298176002, 60298176003, 60298176004

METHOD BLANK: 2367515 Matrix: Water  
Associated Lab Samples: 60298176001, 60298176002, 60298176003, 60298176004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Antimony	mg/L	<0.0010	0.0010	04/04/19 16:35	
Arsenic	mg/L	<0.0010	0.0010	04/04/19 16:35	
Cadmium	mg/L	<0.00050	0.00050	04/04/19 16:35	
Cobalt	mg/L	<0.0010	0.0010	04/04/19 16:35	
Molybdenum	mg/L	<0.0010	0.0010	04/04/19 16:35	
Selenium	mg/L	<0.0010	0.0010	04/04/19 16:35	
Thallium	mg/L	<0.0010	0.0010	04/04/19 16:35	

LABORATORY CONTROL SAMPLE: 2367516

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Antimony	mg/L	0.04	0.038	95	85-115	
Arsenic	mg/L	0.04	0.037	91	85-115	
Cadmium	mg/L	0.04	0.038	96	85-115	
Cobalt	mg/L	0.04	0.038	95	85-115	
Molybdenum	mg/L	0.04	0.036	89	85-115	
Selenium	mg/L	0.04	0.037	92	85-115	
Thallium	mg/L	0.04	0.038	95	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2367517 2367518

Parameter	Units	60298176004		2367517		2367518		% Rec	% Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Result	MSD Spike Conc.	MS Spike Conc.	MSD Result	MS % Rec	MSD % Rec						
Antimony	mg/L	<0.0010	0.04	0.04	0.038	0.038	94	94	70-130	0	20		
Arsenic	mg/L	0.0037	0.04	0.04	0.041	0.042	94	95	70-130	1	20		
Cadmium	mg/L	<0.00050	0.04	0.04	0.035	0.036	89	89	70-130	0	20		
Cobalt	mg/L	0.0017	0.04	0.04	0.041	0.042	99	100	70-130	1	20		
Molybdenum	mg/L	0.22	0.04	0.04	0.26	0.26	100	104	70-130	1	20		
Selenium	mg/L	<0.0010	0.04	0.04	0.035	0.034	85	85	70-130	0	20		
Thallium	mg/L	<0.0010	0.04	0.04	0.035	0.035	87	87	70-130	1	20		

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### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: JEC FAA CCR  
Pace Project No.: 60298176

QC Batch: 576564 Analysis Method: SM 2540C  
QC Batch Method: SM 2540C Analysis Description: 2540C Total Dissolved Solids  
Associated Lab Samples: 60298176001, 60298176002, 60298176003, 60298176004

METHOD BLANK: 2365975 Matrix: Water  
Associated Lab Samples: 60298176001, 60298176002, 60298176003, 60298176004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	<5.0	5.0	04/01/19 11:06	

LABORATORY CONTROL SAMPLE: 2365976

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	1000	1060	106	80-120	

SAMPLE DUPLICATE: 2365977

Parameter	Units	60298071006 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	3680	3820	4	10	

SAMPLE DUPLICATE: 2365978

Parameter	Units	60298176004 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	1560	1650	5	10	

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**QUALITY CONTROL DATA**

Project: JEC FAA CCR

Pace Project No.: 60298176

QC Batch: 577185 Analysis Method: SM 4500-H+B

QC Batch Method: SM 4500-H+B Analysis Description: 4500H+B pH

Associated Lab Samples: 60298176001, 60298176002, 60298176003, 60298176004

SAMPLE DUPLICATE: 2368168

Parameter	Units	60298156001 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	6.6	6.6	1	5	H6

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### QUALITY CONTROL DATA

Project: JEC FAA CCR  
Pace Project No.: 60298176

QC Batch: 577463 Analysis Method: EPA 300.0  
QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions  
Associated Lab Samples: 60298176004

METHOD BLANK: 2369462 Matrix: Water  
Associated Lab Samples: 60298176003, 60298176004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	04/05/19 14:25	
Fluoride	mg/L	<0.20	0.20	04/05/19 14:25	
Sulfate	mg/L	<1.0	1.0	04/05/19 14:25	

LABORATORY CONTROL SAMPLE: 2369463

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	5.0	100	90-110	
Fluoride	mg/L	2.5	2.6	105	90-110	
Sulfate	mg/L	5	5.2	105	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2369464 2369465

Parameter	Units	60297982001 Result	MS	MSD	MS	MSD	MS	MSD	% Rec Limits	RPD	Max RPD	Qual
			Spike Conc.	Spike Conc.	Result	Result	% Rec	% Rec				
Chloride	mg/L	18.9J	250	250	258	260	96	96	90-110	1	15	
Fluoride	mg/L	4.5J	125	125	136	137	106	106	90-110	1	15	
Sulfate	mg/L	704	250	250	1060	993	143	116	90-110	7	15	E,M1

MATRIX SPIKE SAMPLE: 2369466

Parameter	Units	60298451001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	24.4	10	34.6	102	90-110	

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### QUALITY CONTROL DATA

Project: JEC FAA CCR

Pace Project No.: 60298176

QC Batch: 577497

Analysis Method: EPA 300.0

QC Batch Method: EPA 300.0

Analysis Description: 300.0 IC Anions

Associated Lab Samples: 60298176001

METHOD BLANK: 2369586

Matrix: Water

Associated Lab Samples: 60298176001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Fluoride	mg/L	<0.20	0.20	04/05/19 18:04	

LABORATORY CONTROL SAMPLE: 2369587

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Fluoride	mg/L	2.5	2.4	97	90-110	

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### QUALITY CONTROL DATA

Project: JEC FAA CCR  
Pace Project No.: 60298176

QC Batch: 577678 Analysis Method: EPA 300.0  
QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions  
Associated Lab Samples: 60298176001, 60298176002, 60298176003

METHOD BLANK: 2370635 Matrix: Water  
Associated Lab Samples: 60298176001, 60298176002, 60298176003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	04/06/19 10:51	
Fluoride	mg/L	<0.20	0.20	04/06/19 10:51	
Sulfate	mg/L	<1.0	1.0	04/06/19 10:51	

LABORATORY CONTROL SAMPLE: 2370636

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.8	95	90-110	
Fluoride	mg/L	2.5	2.6	103	90-110	
Sulfate	mg/L	5	5.1	101	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2370637 2370638

Parameter	Units	60298156001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chloride	mg/L	70000	25000	25000	101000	91400	123	86	90-110	10	15	E,M1

MATRIX SPIKE SAMPLE: 2370639

Parameter	Units	60298258008 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	ND	5	5.3	93	90-110	
Fluoride	mg/L	ND	2.5	2.9	115	90-110	M1
Sulfate	mg/L	ND	5	5.5	110	90-110	

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### QUALITY CONTROL DATA

Project: JEC FAA CCR

Pace Project No.: 60298176

QC Batch: 577711

Analysis Method: EPA 300.0

QC Batch Method: EPA 300.0

Analysis Description: 300.0 IC Anions

Associated Lab Samples: 60298176003

METHOD BLANK: 2370960

Matrix: Water

Associated Lab Samples: 60298176003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Sulfate	mg/L	<1.0	1.0	04/07/19 14:54	

LABORATORY CONTROL SAMPLE: 2370961

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Sulfate	mg/L	5	5.3	106	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2370962 2370963

Parameter	Units	60298176003		2370963		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result						
Sulfate	mg/L	1090	500	500	1680	1720	116	126	90-110	3	15 M1

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## QUALIFIERS

Project: JEC FAA CCR

Pace Project No.: 60298176

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### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### LABORATORIES

PASI-K Pace Analytical Services - Kansas City

### ANALYTE QUALIFIERS

E Analyte concentration exceeded the calibration range. The reported result is estimated.

H6 Analysis initiated outside of the 15 minute EPA required holding time.

M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC FAA CCR

Pace Project No.: 60298176

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60298176001	FAA-5-032619	EPA 200.7	576952	EPA 200.7	577108
60298176002	FAA-4-032619	EPA 200.7	576952	EPA 200.7	577108
60298176003	FAA-3-032619	EPA 200.7	576952	EPA 200.7	577108
60298176004	FAA-6-032619	EPA 200.7	576952	EPA 200.7	577108
60298176001	FAA-5-032619	EPA 200.8	577038	EPA 200.8	577120
60298176002	FAA-4-032619	EPA 200.8	577038	EPA 200.8	577120
60298176003	FAA-3-032619	EPA 200.8	577038	EPA 200.8	577120
60298176004	FAA-6-032619	EPA 200.8	577038	EPA 200.8	577120
60298176001	FAA-5-032619	EPA 245.1	576271	EPA 245.1	576458
60298176002	FAA-4-032619	EPA 245.1	576271	EPA 245.1	576458
60298176003	FAA-3-032619	EPA 245.1	576271	EPA 245.1	576458
60298176004	FAA-6-032619	EPA 245.1	576271	EPA 245.1	576458
60298176001	FAA-5-032619	SM 2540C	576564		
60298176002	FAA-4-032619	SM 2540C	576564		
60298176003	FAA-3-032619	SM 2540C	576564		
60298176004	FAA-6-032619	SM 2540C	576564		
60298176001	FAA-5-032619	SM 4500-H+B	577185		
60298176002	FAA-4-032619	SM 4500-H+B	577185		
60298176003	FAA-3-032619	SM 4500-H+B	577185		
60298176004	FAA-6-032619	SM 4500-H+B	577185		
60298176001	FAA-5-032619	EPA 300.0	577497		
60298176001	FAA-5-032619	EPA 300.0	577678		
60298176002	FAA-4-032619	EPA 300.0	577678		
60298176003	FAA-3-032619	EPA 300.0	577678		
60298176003	FAA-3-032619	EPA 300.0	577711		
60298176004	FAA-6-032619	EPA 300.0	577463		

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**Sample Condition Upon Receipt**

**WO#: 60298176**  
  
60298176

Client Name: WESTAR

Courier: FedEx  UPS  VIA  Clay  PEX  ECI  Pace  Xroads  Client  Other

Tracking #: \_\_\_\_\_ Pace Shipping Label Used? Yes  No

Custody Seal on Cooler/Box Present: Yes  No  Seals intact: Yes  No

Packing Material: Bubble Wrap  Bubble Bags  Foam  None  Other  ZPLC

Thermometer Used: T-298 Type of Ice: WT Blue  None

Cooler Temperature (°C): As-read 0.5 Corr. Factor -0.1 Corrected 0.4

Date and initials of person LP examining contents: 3-28-19

Temperature should be above freezing to 6°C

Chain of Custody present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Chain of Custody relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples arrived within holding time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Short Hold Time analyses (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Rush Turn Around Time requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Sufficient volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Correct containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Pace containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Filtered volume received for dissolved tests?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Sample labels match COC: Date / time / ID / analyses	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples contain multiple phases? Matrix: <u>WT</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Containers requiring pH preservation in compliance? (HNO <sub>3</sub> , H <sub>2</sub> SO <sub>4</sub> , HCl<2; NaOH>9 Sulfide, NaOH>10 Cyanide) (Exceptions: VOA, Micro, O&G, KS TPH, OK-DRO)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	List sample IDs, volumes, lot #'s of preservative and the date/time added.
Cyanide water sample checks:		
Lead acetate strip turns dark? (Record only)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Potassium iodide test strip turns blue/purple? (Preserve)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Trip Blank present:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Headspace in VOA vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Samples from USDA Regulated Area: State:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Additional labels attached to 5035A / TX1005 vials in the field?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

Client Notification/ Resolution: Copy COC to Client? Y / N Field Data Required? Y / N

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_

Comments/ Resolution: \_\_\_\_\_

Project Manager Review: \_\_\_\_\_ Date: \_\_\_\_\_



April 08, 2019

Brandon Griffin  
Westar Energy  
818 S. Kansas Ave  
Topeka, KS 66612

RE: Project: JEC FAA CCR  
Pace Project No.: 60297981

Dear Brandon Griffin:

Enclosed are the analytical results for sample(s) received by the laboratory on March 27, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Heather Wilson  
heather.wilson@pacelabs.com  
1(913)563-1407  
Project Manager

Enclosures

cc: HEATH HORYNA, WESTAR ENERGY  
Andrew Hare, Westar Energy  
Adam Kneeling, Haley & Aldrich, Inc.  
JARED MORRISON, WESTAR ENERGY  
Melissa Michels, Westar Energy  
JD Schlegel, KCP&L & Westar



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: JEC FAA CCR

Pace Project No.: 60297981

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### Pennsylvania Certification IDs

1638 Roseytown Rd Suites 2,3&4, Greensburg, PA 15601

ANAB DOD-ELAP Rad Accreditation #: L2417

Alabama Certification #: 41590

Arizona Certification #: AZ0734

Arkansas Certification

California Certification #: 04222CA

Colorado Certification #: PA01547

Connecticut Certification #: PH-0694

Delaware Certification

EPA Region 4 DW Rad

Florida/TNI Certification #: E87683

Georgia Certification #: C040

Guam Certification

Hawaii Certification

Idaho Certification

Illinois Certification

Indiana Certification

Iowa Certification #: 391

Kansas/TNI Certification #: E-10358

Kentucky Certification #: KY90133

KY WW Permit #: KY0098221

KY WW Permit #: KY0000221

Louisiana DHH/TNI Certification #: LA180012

Louisiana DEQ/TNI Certification #: 4086

Maine Certification #: 2017020

Maryland Certification #: 308

Massachusetts Certification #: M-PA1457

Michigan/PADEP Certification #: 9991

Missouri Certification #: 235

Montana Certification #: Cert0082

Nebraska Certification #: NE-OS-29-14

Nevada Certification #: PA014572018-1

New Hampshire/TNI Certification #: 297617

New Jersey/TNI Certification #: PA051

New Mexico Certification #: PA01457

New York/TNI Certification #: 10888

North Carolina Certification #: 42706

North Dakota Certification #: R-190

Ohio EPA Rad Approval: #41249

Oregon/TNI Certification #: PA200002-010

Pennsylvania/TNI Certification #: 65-00282

Puerto Rico Certification #: PA01457

Rhode Island Certification #: 65-00282

South Dakota Certification

Tennessee Certification #: 02867

Texas/TNI Certification #: T104704188-17-3

Utah/TNI Certification #: PA014572017-9

USDA Soil Permit #: P330-17-00091

Vermont Dept. of Health: ID# VT-0282

Virgin Island/PADEP Certification

Virginia/VELAP Certification #: 9526

Washington Certification #: C868

West Virginia DEP Certification #: 143

West Virginia DHHR Certification #: 9964C

Wisconsin Approve List for Rad

Wyoming Certification #: 8TMS-L

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## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: JEC FAA CCR

Pace Project No.: 60297981

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Lab ID	Sample ID	Matrix	Date Collected	Date Received
60297981001	FAA-5-032619	Water	03/26/19 09:00	03/27/19 09:30
60297981002	FAA-4-032619	Water	03/26/19 10:21	03/27/19 09:30
60297981003	FAA-3-032619	Water	03/26/19 11:17	03/27/19 09:30
60297981004	FAA-6-032619	Water	03/26/19 12:21	03/27/19 09:30

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### SAMPLE ANALYTE COUNT

Project: JEC FAA CCR

Pace Project No.: 60297981

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60297981001	FAA-5-032619	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	JLW	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60297981002	FAA-4-032619	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	JLW	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60297981003	FAA-3-032619	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	JLW	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60297981004	FAA-6-032619	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	JLW	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA

### REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60297981

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**Method:** EPA 903.1

**Description:** 903.1 Radium 226

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

**General Information:**

4 samples were analyzed for EPA 903.1. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60297981

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**Method:** EPA 904.0

**Description:** 904.0 Radium 228

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

**General Information:**

4 samples were analyzed for EPA 904.0. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60297981

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**Method:** Total Radium Calculation

**Description:** Total Radium 228+226

**Client:** WESTAR ENERGY

**Date:** April 08, 2019

**General Information:**

4 samples were analyzed for Total Radium Calculation. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60297981

**Sample: FAA-5-032619**      **Lab ID: 60297981001**      Collected: 03/26/19 09:00      Received: 03/27/19 09:30      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.261 ± 0.469 (0.801)</b> C:NA T:98%	pCi/L	04/05/19 11:09	13982-63-3	
Radium-228	EPA 904.0	<b>0.742 ± 0.506 (0.999)</b> C:74% T:88%	pCi/L	04/04/19 13:11	15262-20-1	
Total Radium	Total Radium Calculation	<b>1.00 ± 0.975 (1.80)</b>	pCi/L	04/08/19 11:52	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60297981

**Sample: FAA-4-032619**      **Lab ID: 60297981002**      Collected: 03/26/19 10:21      Received: 03/27/19 09:30      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.640 ± 0.667 (1.01)</b> <b>C:NA T:80%</b>	pCi/L	04/05/19 11:09	13982-63-3	
Radium-228	EPA 904.0	<b>0.761 ± 0.517 (1.01)</b> <b>C:73% T:77%</b>	pCi/L	04/04/19 13:11	15262-20-1	
Total Radium	Total Radium Calculation	<b>1.40 ± 1.18 (2.02)</b>	pCi/L	04/08/19 11:52	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60297981

**Sample: FAA-3-032619**      **Lab ID: 60297981003**      Collected: 03/26/19 11:17      Received: 03/27/19 09:30      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.0421 ± 0.336 (0.696)</b> C:NA T:94%	pCi/L	04/05/19 11:09	13982-63-3	
Radium-228	EPA 904.0	<b>0.310 ± 0.446 (0.961)</b> C:74% T:82%	pCi/L	04/04/19 13:11	15262-20-1	
Total Radium	Total Radium Calculation	<b>0.352 ± 0.782 (1.66)</b>	pCi/L	04/08/19 11:52	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60297981

**Sample: FAA-6-032619**      **Lab ID: 60297981004**      Collected: 03/26/19 12:21      Received: 03/27/19 09:30      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.873 ± 0.630 (0.812)</b> C:NA T:92%	pCi/L	04/05/19 11:09	13982-63-3	
Radium-228	EPA 904.0	<b>0.555 ± 0.492 (1.01)</b> C:74% T:83%	pCi/L	04/04/19 13:11	15262-20-1	
Total Radium	Total Radium Calculation	<b>1.43 ± 1.12 (1.82)</b>	pCi/L	04/08/19 11:52	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60297981

QC Batch: 335759

Analysis Method: EPA 904.0

QC Batch Method: EPA 904.0

Analysis Description: 904.0 Radium 228

Associated Lab Samples: 60297981001, 60297981002, 60297981003, 60297981004

METHOD BLANK: 1633714

Matrix: Water

Associated Lab Samples: 60297981001, 60297981002, 60297981003, 60297981004

Parameter	Act ± Unc (MDC) Carr Trac	Units	Analyzed	Qualifiers
Radium-228	0.170 ± 0.319 (0.701) C:76% T:81%	pCi/L	04/04/19 13:09	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60297981

QC Batch: 336036

Analysis Method: EPA 903.1

QC Batch Method: EPA 903.1

Analysis Description: 903.1 Radium-226

Associated Lab Samples: 60297981001, 60297981002, 60297981003, 60297981004

METHOD BLANK: 1634873

Matrix: Water

Associated Lab Samples: 60297981001, 60297981002, 60297981003, 60297981004

Parameter	Act ± Unc (MDC) Carr Trac	Units	Analyzed	Qualifiers
Radium-226	-0.0135 ± 0.322 (0.525) C:NA T:96%	pCi/L	04/05/19 10:31	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

### REPORT OF LABORATORY ANALYSIS

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## QUALIFIERS

Project: JEC FAA CCR

Pace Project No.: 60297981

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### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Act - Activity

Unc - Uncertainty: SDWA = 1.96 sigma count uncertainty, all other matrices = Expanded Uncertainty (95% confidence interval).

Gamma Spec = Expanded Uncertainty (95.4% Confidence Interval)

(MDC) - Minimum Detectable Concentration

Trac - Tracer Recovery (%)

Carr - Carrier Recovery (%)

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### LABORATORIES

PASI-PA Pace Analytical Services - Greensburg

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC FAA CCR

Pace Project No.: 60297981

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60297981001	FAA-5-032619	EPA 903.1	336036		
60297981002	FAA-4-032619	EPA 903.1	336036		
60297981003	FAA-3-032619	EPA 903.1	336036		
60297981004	FAA-6-032619	EPA 903.1	336036		
60297981001	FAA-5-032619	EPA 904.0	335759		
60297981002	FAA-4-032619	EPA 904.0	335759		
60297981003	FAA-3-032619	EPA 904.0	335759		
60297981004	FAA-6-032619	EPA 904.0	335759		
60297981001	FAA-5-032619	Total Radium Calculation	337303		
60297981002	FAA-4-032619	Total Radium Calculation	337303		
60297981003	FAA-3-032619	Total Radium Calculation	337303		
60297981004	FAA-6-032619	Total Radium Calculation	337303		

### REPORT OF LABORATORY ANALYSIS

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# Chain of Custody



Samples were sent directly to the Subcontracting Laboratory.

State Of Origin: KS  
 Cert. Needed:  Yes  No  
 Owner Received Date: 3/27/2019 Results Requested By: 4/10/2019

Workorder: 60297981 Workorder Name: JEC FAA CCR

Report To		Subcontract To					Requested Analysis																
Heather Wilson Pace Analytical Kansas 9608 Loiret Blvd. Lenexa, KS 66219 Phone 1(913)563-1407		Pace Analytical Pittsburgh 1638 Roseytown Road Suites 2,3, & 4 Greensburg, PA 15601 Phone (724)850-5600					<div style="font-size: 24px; font-weight: bold;">WO# : 30286238</div> <div style="font-weight: bold;">30286238</div>																
Item	Sample ID	Sample Type	Collect Date/Time	Lab ID	Matrix	Preserved Containers					Radium-226 & Total Radium		LAB USE ONLY										
						Other																	
1	FAA-5-032619	PS	3/26/2019 09:00	60297981001	Water	1						X	X										
2	FAA-4-032619	PS	3/26/2019 10:21	60297981002	Water	1						X	X										001
3	FAA-3-032619	PS	3/26/2019 11:17	60297981003	Water	1						X	X										002
4	FAA-6-032619	PS	3/26/2019 12:21	60297981004	Water	1						X	X										003
5																							004
Transfers													Comments										
Released By	Date/Time	Received By	Date/Time																				
		<i>Emily</i>	3-27-19	0930																			
Cooler Temperature on Receipt <i>7.6</i> °C		Custody Seal <input checked="" type="checkbox"/> or N			Received on Ice <input checked="" type="checkbox"/> or N			Samples Intact <input checked="" type="checkbox"/> or N															

\*\*\*In order to maintain client confidentiality, location/name of the sampling site, sampler's name and signature may not be provided on this COC document.  
 This chain of custody is considered complete as is since this information is available in the owner laboratory.



<b>Section A</b> Required Client Information:		<b>Section B</b> Required Project Information:		<b>Section C</b> Invoice Information:		Page: / of /	
Company: WESTAR ENERGY		Report To: Brandon Griffin		Attention: Jared Morrison		<b>REGULATORY AGENCY</b> <input checked="" type="checkbox"/> NPDES <input type="checkbox"/> GROUND WATER <input type="checkbox"/> DRINKING WATER <input type="checkbox"/> UST <input type="checkbox"/> RCRA <input type="checkbox"/> OTHER	
Address: 818 Kansas Ave Topeka, KS 66612		Copy To: Jared Morrison, Heath Horny		Company Name: WESTAR ENERGY			
Email To: brandon.l.griffin@westarenergy.com		Purchase Order No.: 10JEC-000040819		Address: SEE SECTION A		Site Location STATE: KS	
Phone: (785) 575-8135 Fax:		Project Name: JEC FAA CCR		Pace Quote Reference:			
Requested Due Date/TAT: 15 Day 4/12/19		Project Number:		Pace Project Manager: Heather Wilson, 913-563-1407		/	
				Pace Profile #: 9657, 2			

ITEM #	Section D Required Client Information  SAMPLE ID (A-Z, 0-9 /, -) Sample IDs MUST BE UNIQUE	Valid Matrix Codes		MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED				SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives						Analysis Test Y/N	Requested Analysis Filtered (Y/N)			Residual Chlorine (Y/N)	Pace Project No./ Lab I.D.		
		MATRIX	CODE			COMPOSITE START		COMPOSITE END/GRAB				Unpreserved	H <sub>2</sub> SO <sub>4</sub>	HNO <sub>3</sub>	HCl	NaOH	Na <sub>2</sub> S <sub>2</sub> O <sub>3</sub>		Methanol	Other	Radium-226			Radium-228	Total Radium
		DRINKING WATER	DW			DATE	TIME	DATE	TIME																
1	FAA-5-032619	WT	G					3/26	0900		2														
2	PAA-4-032619	WT	G					3/26	1021		2														
3	FAA-3-032619	WT	G					3/26	1117		2														
4	FAA-6-032619	WT	G					3/26	1221		2														
5																									
6																									
7																									
8																									
9																									
10																									
11																									
12																									

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS			
**200.7 Total Metals: Ba, Be, Cr, Pb, Li	Bryon / Westar	3/26	1600	Emily F	3/27/19	0930	16	4	4	4
**200.8 Total Metals: Co, As, Se, Mo, Cd, Sb, Ti										

SAMPLER NAME AND SIGNATURE		Temp in °C	Received on Ice (Y/N)	Custody Sealed Cooler (Y/N)	Samples Intact (Y/N)
PRINT Name of SAMPLER: Brandon Griffin	SIGNATURE of SAMPLER: Bryon				
DATE Signed (MM/DD/YY): 03/26/19					

\*Important Note: By signing this form you are accepting Pace's NET 30 day payment terms and agreeing to late charges of 1.5% per month for any invoices not paid within 30 days.

Pittsburgh Lab Sample Condition Upon Receipt



Client Name: Westar Energy

Project # 30286238

Courier:  Fed Ex  UPS  USPS  Client  Commercial  Pace Other \_\_\_\_\_  
 Tracking #: 474687425348

Label	<u>ET</u>
LIMS Login	<u>ET</u>

Custody Seal on Cooler/Box Present:  yes  no    Seals intact:  yes  no

Thermometer Used 11    Type of Ice:  Wet  Blue  None

Cooler Temperature    Observed Temp 1.6 °C    Correction Factor: 0.0 °C    Final Temp: 1.6 °C  
 Temp should be above freezing to 6°C

Comments:	pH paper Lot#			Date and initials of person examining contents: <u>ET 3-27-19</u>
	Yes	No	N/A	
Chain of Custody Present:	/			1.
Chain of Custody Filled Out:	/			2.
Chain of Custody Relinquished:	/			3.
Sampler Name & Signature on COC:	/			4.
Sample Labels match COC: -Includes date/time/ID      Matrix: <u>WT</u>	/			5.
Samples Arrived within Hold Time:	/			6.
Short Hold Time Analysis (<72hr remaining):	/			7.
Rush Turn Around Time Requested:	/			8.
Sufficient Volume:	/			9.
Correct Containers Used: -Pace Containers Used:	/			10.
Containers Intact:	/			11.
Orthophosphate field filtered			/	12.
Hex Cr Aqueous Compliance/NPDES sample field filtered			/	13.
Organic Samples checked for dechlorination:			/	14.
Filtered volume received for Dissolved tests			/	15.
All containers have been checked for preservation.	/			16.
All containers needing preservation are found to be in compliance with EPA recommendation.	/			
exceptions: VOA, coliform, TOC, O&G, Phenolics				
				Initial when completed: <u>ET</u> Date/time of preservation
				Lot # of added preservative
Headspace in VOA Vials (>6mm):			/	17.
Trip Blank Present:			/	18.
Trip Blank Custody Seals Present			/	
Rad Samples Screened < 0.5 mrem/hr	/			Initial when completed: <u>ET</u> Date: <u>3-27-19</u>

Client Notification/ Resolution:

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_ Contacted By: \_\_\_\_\_

Comments/ Resolution: \_\_\_\_\_

A check in this box indicates that additional information has been stored in ereports.

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e. out of hold, incorrect preservative, out of temp, incorrect containers)

\*PM review is documented electronically in LIMS. When the Project Manager closes the SRF Review schedule in LIMS. The review is in the Status section of the Workorder Edit Screen.

**ATTACHMENT 1-2**  
**June 2019 Sampling Event**  
**Laboratory Analytical Report**

July 05, 2019

JD Schlegel  
KCP&L & Westar  
818 Kansas Avenue  
Topeka, KS 66612

RE: Project: JEC FAA CCR  
Pace Project No.: 60306862

Dear JD Schlegel:

Enclosed are the analytical results for sample(s) received by the laboratory on June 25, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Heather Wilson  
heather.wilson@pacelabs.com  
1(913)563-1407  
Project Manager

Enclosures

cc: HEATH HORYNA, WESTAR ENERGY  
Andrew Hare, Westar Energy  
Jake Humphrey, KCP&L & Westar, Evergy Companies  
Adam Kneeling, Haley & Aldrich, Inc.  
JARED MORRISON, WESTAR ENERGY  
Melissa Michels, Westar Energy



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: JEC FAA CCR

Pace Project No.: 60306862

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### **Kansas Certification IDs**

9608 Loiret Boulevard, Lenexa, KS 66219

Missouri Inorganic Drinking Water Certification #: 10090

Arkansas Drinking Water

Arkansas Certification #: 19-016-0

Arkansas Drinking Water

Illinois Certification #: 004455

Iowa Certification #: 118

Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055

Nevada Certification #: KS000212018-1

Oklahoma Certification #: 9205/9935

Missouri SEKS Micro Certification: 10070

Florida: Cert E871149 SEKS WET

Texas Certification #: T104704407-18-11

Utah Certification #: KS000212018-8

Illinois Certification #: 004592

Kansas Field Laboratory Accreditation: # E-92587

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## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: JEC FAA CCR

Pace Project No.: 60306862

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60306862001	FAA-3-062319	Water	06/23/19 18:18	06/25/19 12:25
60306862002	FAA-6-062319	Water	06/23/19 19:17	06/25/19 12:25
60306862003	FAA-4-062319	Water	06/24/19 07:50	06/25/19 12:25
60306862004	FAA-5-062319	Water	06/24/19 08:55	06/25/19 12:25

## REPORT OF LABORATORY ANALYSIS

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### SAMPLE ANALYTE COUNT

Project: JEC FAA CCR

Pace Project No.: 60306862

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60306862001	FAA-3-062319	EPA 200.7	EMR	5	PASI-K
		EPA 200.8	JGP	7	PASI-K
		EPA 245.1	TDS	1	PASI-K
		EPA 300.0	MGS	1	PASI-K
60306862002	FAA-6-062319	EPA 200.7	EMR	5	PASI-K
		EPA 200.8	JGP	7	PASI-K
		EPA 245.1	TDS	1	PASI-K
		EPA 300.0	MGS	1	PASI-K
60306862003	FAA-4-062319	EPA 200.7	EMR	5	PASI-K
		EPA 200.8	JGP	7	PASI-K
		EPA 245.1	TDS	1	PASI-K
		EPA 300.0	MGS	1	PASI-K
60306862004	FAA-5-062319	EPA 200.7	EMR	5	PASI-K
		EPA 200.8	JGP	7	PASI-K
		EPA 245.1	TDS	1	PASI-K
		EPA 300.0	MGS	1	PASI-K

### REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60306862

---

**Method:** EPA 200.7

**Description:** 200.7 Metals, Total

**Client:** WESTAR ENERGY

**Date:** July 05, 2019

**General Information:**

4 samples were analyzed for EPA 200.7. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 200.7 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60306862

---

**Method:** EPA 200.8

**Description:** 200.8 MET ICPMS

**Client:** WESTAR ENERGY

**Date:** July 05, 2019

**General Information:**

4 samples were analyzed for EPA 200.8. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 200.8 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Internal Standards:**

All internal standards were within QC limits with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 593775

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60306862002,60306864002

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2434174)
  - Molybdenum
  - Selenium

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60306862

---

**Method:** EPA 245.1

**Description:** 245.1 Mercury

**Client:** WESTAR ENERGY

**Date:** July 05, 2019

**General Information:**

4 samples were analyzed for EPA 245.1. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 245.1 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60306862

---

**Method:** EPA 300.0

**Description:** 300.0 IC Anions 28 Days

**Client:** WESTAR ENERGY

**Date:** July 05, 2019

**General Information:**

4 samples were analyzed for EPA 300.0. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 594228

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60306862001,60306864004

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2435440)
  - Fluoride

R1: RPD value was outside control limits.

- MSD (Lab ID: 2435441)
  - Fluoride

**Additional Comments:**

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: JEC FAA CCR

Pace Project No.: 60306862

Sample: <b>FAA-3-062319</b>	Lab ID: <b>60306862001</b>	Collected: 06/23/19 18:18	Received: 06/25/19 12:25	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>								
Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Barium, Total Recoverable	<b>0.033</b>	mg/L	0.0050	1	07/01/19 10:26	07/01/19 18:17	7440-39-3	
Beryllium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 10:26	07/01/19 18:17	7440-41-7	
Chromium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	07/01/19 10:26	07/01/19 18:17	7440-47-3	
Lead, Total Recoverable	<b>&lt;0.010</b>	mg/L	0.010	1	07/01/19 10:26	07/01/19 18:17	7439-92-1	
Lithium	<b>&lt;0.010</b>	mg/L	0.010	1	07/01/19 10:26	07/01/19 18:17	7439-93-2	
<b>200.8 MET ICPMS</b>								
Analytical Method: EPA 200.8 Preparation Method: EPA 200.8								
Antimony, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:18	7440-36-0	
Arsenic, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:18	7440-38-2	
Cadmium, Total Recoverable	<b>&lt;0.00050</b>	mg/L	0.00050	1	07/01/19 12:18	07/02/19 11:18	7440-43-9	
Cobalt, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:18	7440-48-4	
Molybdenum, Total Recoverable	<b>0.011</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:18	7439-98-7	
Selenium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:18	7782-49-2	
Thallium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:18	7440-28-0	
<b>245.1 Mercury</b>								
Analytical Method: EPA 245.1 Preparation Method: EPA 245.1								
Mercury	<b>&lt;0.20</b>	ug/L	0.20	1	07/02/19 10:30	07/05/19 14:28	7439-97-6	
<b>300.0 IC Anions 28 Days</b>								
Analytical Method: EPA 300.0								
Fluoride	<b>0.43</b>	mg/L	0.20	1		07/03/19 15:09	16984-48-8	M1,R1

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: JEC FAA CCR

Pace Project No.: 60306862

Sample: <b>FAA-6-062319</b>	Lab ID: <b>60306862002</b>	Collected: 06/23/19 19:17	Received: 06/25/19 12:25	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>								
Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Barium, Total Recoverable	<b>0.026</b>	mg/L	0.0050	1	07/01/19 10:26	07/01/19 18:20	7440-39-3	
Beryllium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 10:26	07/01/19 18:20	7440-41-7	
Chromium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	07/01/19 10:26	07/01/19 18:20	7440-47-3	
Lead, Total Recoverable	<b>&lt;0.010</b>	mg/L	0.010	1	07/01/19 10:26	07/01/19 18:20	7439-92-1	
Lithium	<b>&lt;0.010</b>	mg/L	0.010	1	07/01/19 10:26	07/01/19 18:20	7439-93-2	
<b>200.8 MET ICPMS</b>								
Analytical Method: EPA 200.8 Preparation Method: EPA 200.8								
Antimony, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:21	7440-36-0	
Arsenic, Total Recoverable	<b>0.0043</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:21	7440-38-2	
Cadmium, Total Recoverable	<b>&lt;0.00050</b>	mg/L	0.00050	1	07/01/19 12:18	07/02/19 11:21	7440-43-9	
Cobalt, Total Recoverable	<b>0.0012</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:21	7440-48-4	
Molybdenum, Total Recoverable	<b>0.34</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:21	7439-98-7	M1
Selenium, Total Recoverable	<b>0.014</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:21	7782-49-2	M1
Thallium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:21	7440-28-0	
<b>245.1 Mercury</b>								
Analytical Method: EPA 245.1 Preparation Method: EPA 245.1								
Mercury	<b>&lt;0.20</b>	ug/L	0.20	1	07/02/19 10:30	07/05/19 14:32	7439-97-6	
<b>300.0 IC Anions 28 Days</b>								
Analytical Method: EPA 300.0								
Fluoride	<b>1.2</b>	mg/L	0.20	1		07/03/19 15:53	16984-48-8	

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## ANALYTICAL RESULTS

Project: JEC FAA CCR

Pace Project No.: 60306862

Sample: <b>FAA-4-062319</b>	Lab ID: <b>60306862003</b>	Collected: 06/24/19 07:50	Received: 06/25/19 12:25	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>								
Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Barium, Total Recoverable	<b>0.052</b>	mg/L	0.0050	1	07/01/19 10:26	07/01/19 18:23	7440-39-3	
Beryllium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 10:26	07/01/19 18:23	7440-41-7	
Chromium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	07/01/19 10:26	07/01/19 18:23	7440-47-3	
Lead, Total Recoverable	<b>&lt;0.010</b>	mg/L	0.010	1	07/01/19 10:26	07/01/19 18:23	7439-92-1	
Lithium	<b>0.017</b>	mg/L	0.010	1	07/01/19 10:26	07/01/19 18:23	7439-93-2	
<b>200.8 MET ICPMS</b>								
Analytical Method: EPA 200.8 Preparation Method: EPA 200.8								
Antimony, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:28	7440-36-0	
Arsenic, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:28	7440-38-2	
Cadmium, Total Recoverable	<b>&lt;0.00050</b>	mg/L	0.00050	1	07/01/19 12:18	07/02/19 11:28	7440-43-9	
Cobalt, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:28	7440-48-4	
Molybdenum, Total Recoverable	<b>0.0065</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:28	7439-98-7	
Selenium, Total Recoverable	<b>0.0019</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:28	7782-49-2	
Thallium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 11:28	7440-28-0	
<b>245.1 Mercury</b>								
Analytical Method: EPA 245.1 Preparation Method: EPA 245.1								
Mercury	<b>&lt;0.20</b>	ug/L	0.20	1	07/02/19 10:30	07/05/19 14:35	7439-97-6	
<b>300.0 IC Anions 28 Days</b>								
Analytical Method: EPA 300.0								
Fluoride	<b>0.44</b>	mg/L	0.20	1		07/03/19 16:07	16984-48-8	

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## ANALYTICAL RESULTS

Project: JEC FAA CCR

Pace Project No.: 60306862

Sample: <b>FAA-5-062319</b>	Lab ID: <b>60306862004</b>	Collected: 06/24/19 08:55	Received: 06/25/19 12:25	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>								
Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Barium, Total Recoverable	<b>0.0072</b>	mg/L	0.0050	1	07/01/19 10:26	07/01/19 18:25	7440-39-3	
Beryllium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 10:26	07/01/19 18:25	7440-41-7	
Chromium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	07/01/19 10:26	07/01/19 18:25	7440-47-3	
Lead, Total Recoverable	<b>&lt;0.010</b>	mg/L	0.010	1	07/01/19 10:26	07/01/19 18:25	7439-92-1	
Lithium	<b>0.11</b>	mg/L	0.010	1	07/01/19 10:26	07/01/19 18:25	7439-93-2	
<b>200.8 MET ICPMS</b>								
Analytical Method: EPA 200.8 Preparation Method: EPA 200.8								
Antimony, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 12:15	7440-36-0	
Arsenic, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 12:15	7440-38-2	
Cadmium, Total Recoverable	<b>&lt;0.00050</b>	mg/L	0.00050	1	07/01/19 12:18	07/02/19 12:15	7440-43-9	
Cobalt, Total Recoverable	<b>0.0056</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 12:15	7440-48-4	
Molybdenum, Total Recoverable	<b>0.053</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 12:15	7439-98-7	
Selenium, Total Recoverable	<b>0.0011</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 12:15	7782-49-2	
Thallium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	07/01/19 12:18	07/02/19 12:15	7440-28-0	
<b>245.1 Mercury</b>								
Analytical Method: EPA 245.1 Preparation Method: EPA 245.1								
Mercury	<b>&lt;0.20</b>	ug/L	0.20	1	07/02/19 10:30	07/05/19 14:37	7439-97-6	
<b>300.0 IC Anions 28 Days</b>								
Analytical Method: EPA 300.0								
Fluoride	<b>1.6</b>	mg/L	0.20	1		07/03/19 16:52	16984-48-8	

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### QUALITY CONTROL DATA

Project: JEC FAA CCR

Pace Project No.: 60306862

QC Batch: 594114 Analysis Method: EPA 245.1  
 QC Batch Method: EPA 245.1 Analysis Description: 245.1 Mercury  
 Associated Lab Samples: 60306862001, 60306862002, 60306862003, 60306862004

METHOD BLANK: 2435087 Matrix: Water  
 Associated Lab Samples: 60306862001, 60306862002, 60306862003, 60306862004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	ug/L	<0.20	0.20	07/05/19 14:16	

LABORATORY CONTROL SAMPLE: 2435088

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	5	4.9	98	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2435089 2435090

Parameter	Units	60306905001		2435089		2435090		% Rec Limits	RPD	Max RPD	Qual	
		MS Result	MSD Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result					MS % Rec
Mercury	ug/L	<0.20	<0.20	5	5	4.8	4.7	96	93	70-130	3	20

MATRIX SPIKE SAMPLE: 2435091

Parameter	Units	60306862001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	<0.20	5	4.2	83	70-130	

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### REPORT OF LABORATORY ANALYSIS

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**QUALITY CONTROL DATA**

Project: JEC FAA CCR  
Pace Project No.: 60306862

QC Batch: 593768 Analysis Method: EPA 200.7  
QC Batch Method: EPA 200.7 Analysis Description: 200.7 Metals, Total  
Associated Lab Samples: 60306862001, 60306862002, 60306862003, 60306862004

METHOD BLANK: 2434147 Matrix: Water  
Associated Lab Samples: 60306862001, 60306862002, 60306862003, 60306862004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Barium	mg/L	<0.0050	0.0050	07/01/19 18:15	
Beryllium	mg/L	<0.0010	0.0010	07/01/19 18:15	
Chromium	mg/L	<0.0050	0.0050	07/01/19 18:15	
Lead	mg/L	<0.010	0.010	07/01/19 18:15	
Lithium	mg/L	<0.010	0.010	07/01/19 18:15	

LABORATORY CONTROL SAMPLE: 2434148

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Barium	mg/L	1	0.99	99	85-115	
Beryllium	mg/L	1	0.99	99	85-115	
Chromium	mg/L	1	1.0	100	85-115	
Lead	mg/L	1	0.97	97	85-115	
Lithium	mg/L	1	1.0	102	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2434149 2434150

Parameter	Units	60306862004		MSD		MS		MSD		% Rec Limits	RPD	Max RPD	Qual
		Result	MS Spike Conc.	Spike Conc.	Result	MS Result	MS % Rec	MSD % Rec					
Barium	mg/L	0.0072	1	1	0.99	1.0	98	101	70-130	3	20		
Beryllium	mg/L	<0.0010	1	1	0.99	1.0	99	102	70-130	4	20		
Chromium	mg/L	<0.0050	1	1	0.99	0.99	99	99	70-130	0	20		
Lead	mg/L	<0.010	1	1	0.91	0.92	91	92	70-130	1	20		
Lithium	mg/L	0.11	1	1	1.2	1.2	110	113	70-130	3	20		

MATRIX SPIKE SAMPLE: 2434151

Parameter	Units	60306864004 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Barium	mg/L	0.31	1	1.3	101	70-130	
Beryllium	mg/L	<0.0010	1	0.95	95	70-130	
Chromium	mg/L	<0.0050	1	1.0	102	70-130	
Lead	mg/L	<0.010	1	0.94	94	70-130	
Lithium	mg/L	0.013	1	1.1	110	70-130	

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**REPORT OF LABORATORY ANALYSIS**

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**QUALITY CONTROL DATA**

Project: JEC FAA CCR

Pace Project No.: 60306862

QC Batch: 593775 Analysis Method: EPA 200.8  
 QC Batch Method: EPA 200.8 Analysis Description: 200.8 MET  
 Associated Lab Samples: 60306862001, 60306862002, 60306862003, 60306862004

METHOD BLANK: 2434170 Matrix: Water  
 Associated Lab Samples: 60306862001, 60306862002, 60306862003, 60306862004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Antimony	mg/L	<0.0010	0.0010	07/02/19 11:14	
Arsenic	mg/L	<0.0010	0.0010	07/02/19 11:14	
Cadmium	mg/L	<0.00050	0.00050	07/02/19 11:14	
Cobalt	mg/L	<0.0010	0.0010	07/02/19 11:14	
Molybdenum	mg/L	<0.0010	0.0010	07/02/19 11:14	
Selenium	mg/L	<0.0010	0.0010	07/02/19 11:14	
Thallium	mg/L	<0.0010	0.0010	07/02/19 11:14	

LABORATORY CONTROL SAMPLE: 2434171

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Antimony	mg/L	0.04	0.040	100	85-115	
Arsenic	mg/L	0.04	0.039	97	85-115	
Cadmium	mg/L	0.04	0.041	101	85-115	
Cobalt	mg/L	0.04	0.041	102	85-115	
Molybdenum	mg/L	0.04	0.038	94	85-115	
Selenium	mg/L	0.04	0.039	98	85-115	
Thallium	mg/L	0.04	0.039	97	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2434172 2434173

Parameter	Units	MS		MSD		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		Spike Conc.	Result	Spike Conc.	Result						
Antimony	mg/L	<0.0010	0.04	0.04	0.039	0.039	97	97	70-130	0	20
Arsenic	mg/L	<0.0010	0.04	0.04	0.042	0.042	102	103	70-130	0	20
Cadmium	mg/L	<0.00050	0.04	0.04	0.037	0.038	94	95	70-130	1	20
Cobalt	mg/L	<0.0010	0.04	0.04	0.043	0.044	108	109	70-130	0	20
Molybdenum	mg/L	0.0059	0.04	0.04	0.047	0.047	102	103	70-130	1	20
Selenium	mg/L	<0.0010	0.04	0.04	0.038	0.039	94	96	70-130	2	20
Thallium	mg/L	<0.0010	0.04	0.04	0.037	0.037	93	93	70-130	0	20

MATRIX SPIKE SAMPLE: 2434174

Parameter	Units	60306862002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Antimony	mg/L	<0.0010	0.04	0.039	96	70-130	
Arsenic	mg/L	0.0043	0.04	0.040	90	70-130	
Cadmium	mg/L	<0.00050	0.04	0.038	95	70-130	

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### QUALITY CONTROL DATA

Project: JEC FAA CCR

Pace Project No.: 60306862

MATRIX SPIKE SAMPLE:		2434174					
Parameter	Units	60306862002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Cobalt	mg/L	0.0012	0.04	0.043	104	70-130	
Molybdenum	mg/L	0.34	0.04	0.045	-739	70-130	M1
Selenium	mg/L	0.014	0.04	0.038	60	70-130	M1
Thallium	mg/L	<0.0010	0.04	0.038	94	70-130	

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### QUALITY CONTROL DATA

Project: JEC FAA CCR

Pace Project No.: 60306862

QC Batch: 594228 Analysis Method: EPA 300.0  
 QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions  
 Associated Lab Samples: 60306862001, 60306862002, 60306862003, 60306862004

METHOD BLANK: 2435438 Matrix: Water  
 Associated Lab Samples: 60306862001, 60306862002, 60306862003, 60306862004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Fluoride	mg/L	<0.20	0.20	07/03/19 12:31	

LABORATORY CONTROL SAMPLE: 2435439

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Fluoride	mg/L	2.5	2.5	100	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2435440 2435441

Parameter	Units	60306862001		60306862002		60306862003		60306862004		% Rec Limits	RPD	Max RPD	Qual		
		MS Result	MSD Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS Result	MSD Result						
Fluoride	mg/L	0.43	0.43	2.5	2.5	2.1	2.1	3.1	3.1	67	108	80-120	40	15	M1,R1

MATRIX SPIKE SAMPLE: 2435442

Parameter	Units	60306864004 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Fluoride	mg/L	0.36	2.5	3.0	104	80-120	

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## QUALIFIERS

Project: JEC FAA CCR

Pace Project No.: 60306862

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### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### LABORATORIES

PASI-K Pace Analytical Services - Kansas City

### ANALYTE QUALIFIERS

M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

R1 RPD value was outside control limits.

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC FAA CCR

Pace Project No.: 60306862

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60306862001	FAA-3-062319	EPA 200.7	593768	EPA 200.7	594015
60306862002	FAA-6-062319	EPA 200.7	593768	EPA 200.7	594015
60306862003	FAA-4-062319	EPA 200.7	593768	EPA 200.7	594015
60306862004	FAA-5-062319	EPA 200.7	593768	EPA 200.7	594015
60306862001	FAA-3-062319	EPA 200.8	593775	EPA 200.8	593896
60306862002	FAA-6-062319	EPA 200.8	593775	EPA 200.8	593896
60306862003	FAA-4-062319	EPA 200.8	593775	EPA 200.8	593896
60306862004	FAA-5-062319	EPA 200.8	593775	EPA 200.8	593896
60306862001	FAA-3-062319	EPA 245.1	594114	EPA 245.1	594130
60306862002	FAA-6-062319	EPA 245.1	594114	EPA 245.1	594130
60306862003	FAA-4-062319	EPA 245.1	594114	EPA 245.1	594130
60306862004	FAA-5-062319	EPA 245.1	594114	EPA 245.1	594130
60306862001	FAA-3-062319	EPA 300.0	594228		
60306862002	FAA-6-062319	EPA 300.0	594228		
60306862003	FAA-4-062319	EPA 300.0	594228		
60306862004	FAA-5-062319	EPA 300.0	594228		

### REPORT OF LABORATORY ANALYSIS

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**Sample Condition Upon Receipt**

WO#: 60306862



Client Name: Wester

Courier: FedEx  UPS  VIA  Clay  PEX  ECI  Pace  Xroads  Client  Other

Tracking #: \_\_\_\_\_ Pace Shipping Label Used? Yes  No

Custody Seal on Cooler/Box Present: Yes  No  Seals intact: Yes  No

Packing Material: Bubble Wrap  Bubble Bags  Foam  None  Other

Thermometer Used: 125k Type of Ice: Wet  Blue  None

Cooler Temperature (°C): As-read 1.9 Corr. Factor 1.0 Corrected 0.9

Date and initials of person examining contents: 6/25/19

Temperature should be above freezing to 6°C

Chain of Custody present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Chain of Custody relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples arrived within holding time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Short Hold Time analyses (<72hr):	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Rush Turn Around Time requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Sufficient volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Correct containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Pace containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Filtered volume received for dissolved tests?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Sample labels match COC: Date / time / ID / analyses	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples contain multiple phases? Matrix: <u>WFI</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Containers requiring pH preservation in compliance? (HNO <sub>3</sub> , H <sub>2</sub> SO <sub>4</sub> , HCl<2; NaOH>9 Sulfide, NaOH>10 Cyanide) (Exceptions: VOA, Micro, O&G, KS TPH, OK-DRO)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	List sample IDs, volumes, lot #'s of preservative and the date/time added.
Cyanide water sample checks:		
Lead acetate strip turns dark? (Record only)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Potassium iodide test strip turns blue/purple? (Preserve)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Trip Blank present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Headspace in VOA vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Samples from USDA Regulated Area: State:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Additional labels attached to 5035A / TX1005 vials in the field?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

Client Notification/ Resolution: Copy COC to Client? Y  N  Field Data Required? Y  N

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_

Comments/ Resolution: Due to an IT glitch the COC didn't get updated in the bottle order. So this COC isn't accurate. Please see the attached corrected chain. HMW 6/27/19

Project Manager Review: \_\_\_\_\_ Date: \_\_\_\_\_

# CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

<b>Section A</b> Required Client Information:		<b>Section B</b> Required Project Information:		<b>Section C</b> Invoice Information:	
Company: WESTAR ENERGY	Report To: Brandon Griffin	Attention:		Company Name:	
Address: 818 Kansas Ave	Copy To: Jared Morrison	Address:		REGULATORY AGENCY	
Topeka, KS 66612		Purchase Order No.: 10JEC-0000040819		<input type="checkbox"/> NPDES <input type="checkbox"/> GROUND WATER <input type="checkbox"/> DRINKING WATER <input type="checkbox"/> UST <input type="checkbox"/> RCRA <input type="checkbox"/> OTHER _____	
Email To: brandon.l.griffin@westarenergy.com	Project Name: JEC FAA CCR	Pace Quote Reference:		Pace Project Manager: Heather Wilson 913-563-1407	
Phone: 785-575-8135   Fax:	Project Number:	Pace Profile #: 9657, 1		Site Location: _____ STATE: KS	
Requested Due Date/TAT: 7 day					

ITEM #	Section D Required Client Information	Valid Matrix Codes MATRIX      CODE DRINKING WATER   DW WATER                    WT WASTE WATER        WW PRODUCT                P SOILSOLID                SL OIL                            OL WIPE                        WP AIR                            AR OTHER                    OT TISSUE                    TS	MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED				SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives							Analysis Test ↓	Y/N ↓	Requested Analysis Filtered (Y/N)	Residual Chlorine (Y/N)	Pace Project No./ Lab I.D.				
					COMPOSITE START		COMPOSITE END/GRAB				Unpreserved	H <sub>2</sub> SO <sub>4</sub>	HNO <sub>3</sub>	HCl	NaOH	Na <sub>2</sub> S <sub>2</sub> O <sub>3</sub>	Methanol						Other			
					DATE	TIME	DATE	TIME																		
1	FAA-3-062319		WT	G			06/23	1818	2								X	X	X	X	X	X			001	
2	FAA-6-062319		WT	G			06/23	1917	2								X	X	X	X	X	X			002	
3	FAA-4-062419		WT	G			06/24	750	2								X	X	X	X	X	X			003	
4	FAA-5-062419		WT	G			06/24	855	2								X	X	X	X	X	X			004	
5																										
6																										
7																										
8																										
9																										
10																										
11																										
12																										

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS
200.7 Total Metals*: B, Ca, Ba, Be, Cr, Pb, Li	<i>Paul Kruger</i>	6/25/19	09:00	<i>Paul Kruger</i>	6-25	9:00	
200.8 Total Metals**: Sb, As, Cd, Co, Mo, Se, Tl				<i>Paul Kruger</i>	6/25/19	1725	1.9    ✓    ✓    ✓

SAMPLER NAME AND SIGNATURE		Temp in °C	Received on Ice (Y/N)	Custody Sealed Cooler (Y/N)	Samples Intact (Y/N)
PRINT Name of SAMPLER: <i>Paul Kruger</i>					
SIGNATURE of SAMPLER: <i>Paul Kruger</i>	DATE Signed (MM/DD/YY): <i>6/25/19</i>				





July 16, 2019

JD Schlegel  
KCP&L & Westar  
818 Kansas Avenue  
Topeka, KS 66612

RE: Project: JEC FAA CCR  
Pace Project No.: 60307780

Dear JD Schlegel:

Enclosed are the analytical results for sample(s) received by the laboratory on June 27, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Heather Wilson  
heather.wilson@pacelabs.com  
1(913)563-1407  
Project Manager

Enclosures

cc: HEATH HORYNA, WESTAR ENERGY  
Andrew Hare, Westar Energy  
Jake Humphrey, KCP&L & Westar, Evergy Companies  
Adam Kneeling, Haley & Aldrich, Inc.  
JARED MORRISON, WESTAR ENERGY  
Melissa Michels, Westar Energy



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: JEC FAA CCR

Pace Project No.: 60307780

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### Pennsylvania Certification IDs

1638 Roseytown Rd Suites 2,3&4, Greensburg, PA 15601

ANAB DOD-ELAP Rad Accreditation #: L2417

Alabama Certification #: 41590

Arizona Certification #: AZ0734

Arkansas Certification

California Certification #: 04222CA

Colorado Certification #: PA01547

Connecticut Certification #: PH-0694

Delaware Certification

EPA Region 4 DW Rad

Florida/TNI Certification #: E87683

Georgia Certification #: C040

Florida: Cert E871149 SEKS WET

Guam Certification

Hawaii Certification

Idaho Certification

Illinois Certification

Indiana Certification

Iowa Certification #: 391

Kansas/TNI Certification #: E-10358

Kentucky Certification #: KY90133

KY WW Permit #: KY0098221

KY WW Permit #: KY0000221

Louisiana DHH/TNI Certification #: LA180012

Louisiana DEQ/TNI Certification #: 4086

Maine Certification #: 2017020

Maryland Certification #: 308

Massachusetts Certification #: M-PA1457

Michigan/PADEP Certification #: 9991

Missouri Certification #: 235

Montana Certification #: Cert0082

Nebraska Certification #: NE-OS-29-14

Nevada Certification #: PA014572018-1

New Hampshire/TNI Certification #: 297617

New Jersey/TNI Certification #: PA051

New Mexico Certification #: PA01457

New York/TNI Certification #: 10888

North Carolina Certification #: 42706

North Dakota Certification #: R-190

Ohio EPA Rad Approval: #41249

Oregon/TNI Certification #: PA200002-010

Pennsylvania/TNI Certification #: 65-00282

Puerto Rico Certification #: PA01457

Rhode Island Certification #: 65-00282

South Dakota Certification

Tennessee Certification #: 02867

Texas/TNI Certification #: T104704188-17-3

Utah/TNI Certification #: PA014572017-9

USDA Soil Permit #: P330-17-00091

Vermont Dept. of Health: ID# VT-0282

Virgin Island/PADEP Certification

Virginia/VELAP Certification #: 9526

Washington Certification #: C868

West Virginia DEP Certification #: 143

West Virginia DHHR Certification #: 9964C

Wisconsin Approve List for Rad

Wyoming Certification #: 8TMS-L

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## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: JEC FAA CCR

Pace Project No.: 60307780

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60307780001	FAA-3_062319	Water	06/23/19 18:18	06/27/19 09:30
60307780002	FAA-6_062319	Water	06/23/19 19:17	06/27/19 09:30
60307780003	FAA-4_062319	Water	06/24/19 07:50	06/27/19 09:30
60307780004	FAA-5_062319	Water	06/24/19 08:55	06/27/19 09:30

## REPORT OF LABORATORY ANALYSIS

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### SAMPLE ANALYTE COUNT

Project: JEC FAA CCR

Pace Project No.: 60307780

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60307780001	FAA-3_062319	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	JLW	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60307780002	FAA-6_062319	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	JLW	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60307780003	FAA-4_062319	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	JLW	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60307780004	FAA-5_062319	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	JLW	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA

### REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60307780

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**Method:** EPA 903.1

**Description:** 903.1 Radium 226

**Client:** WESTAR ENERGY

**Date:** July 16, 2019

**General Information:**

4 samples were analyzed for EPA 903.1. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60307780

---

**Method:** EPA 904.0

**Description:** 904.0 Radium 228

**Client:** WESTAR ENERGY

**Date:** July 16, 2019

**General Information:**

4 samples were analyzed for EPA 904.0. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAA CCR

Pace Project No.: 60307780

---

**Method:** Total Radium Calculation

**Description:** Total Radium 228+226

**Client:** WESTAR ENERGY

**Date:** July 16, 2019

**General Information:**

4 samples were analyzed for Total Radium Calculation. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60307780

**Sample: FAA-3\_062319**      **Lab ID: 60307780001**      Collected: 06/23/19 18:18      Received: 06/27/19 09:30      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.245 ± 0.481 (0.864)</b> <b>C:NA T:96%</b>	pCi/L	07/15/19 12:40	13982-63-3	
Radium-228	EPA 904.0	<b>0.208 ± 0.309 (0.666)</b> <b>C:81% T:86%</b>	pCi/L	07/11/19 15:15	15262-20-1	
Total Radium	Total Radium Calculation	<b>0.453 ± 0.790 (1.53)</b>	pCi/L	07/15/19 14:49	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60307780

**Sample: FAA-6\_062319**      **Lab ID: 60307780002**      Collected: 06/23/19 19:17      Received: 06/27/19 09:30      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.607 ± 0.481 (0.653)</b> C:NA T:92%	pCi/L	07/15/19 12:40	13982-63-3	
Radium-228	EPA 904.0	<b>0.823 ± 0.451 (0.833)</b> C:81% T:84%	pCi/L	07/11/19 15:15	15262-20-1	
Total Radium	Total Radium Calculation	<b>1.43 ± 0.932 (1.49)</b>	pCi/L	07/15/19 14:49	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60307780

**Sample: FAA-4\_062319**      **Lab ID: 60307780003**      Collected: 06/24/19 07:50      Received: 06/27/19 09:30      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.674 ± 0.534 (0.725)</b> C:NA T:85%	pCi/L	07/15/19 12:40	13982-63-3	
Radium-228	EPA 904.0	<b>0.863 ± 0.425 (0.736)</b> C:81% T:77%	pCi/L	07/11/19 15:15	15262-20-1	
Total Radium	Total Radium Calculation	<b>1.54 ± 0.959 (1.46)</b>	pCi/L	07/15/19 14:49	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60307780

**Sample: FAA-5\_062319**      **Lab ID: 60307780004**      Collected: 06/24/19 08:55      Received: 06/27/19 09:30      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>1.79 ± 0.700 (0.535)</b> C:NA T:96%	pCi/L	07/15/19 12:40	13982-63-3	
Radium-228	EPA 904.0	<b>0.643 ± 0.419 (0.805)</b> C:83% T:80%	pCi/L	07/11/19 15:15	15262-20-1	
Total Radium	Total Radium Calculation	<b>2.43 ± 1.12 (1.34)</b>	pCi/L	07/15/19 14:49	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60307780

QC Batch: 350656

Analysis Method: EPA 903.1

QC Batch Method: EPA 903.1

Analysis Description: 903.1 Radium-226

Associated Lab Samples: 60307780001, 60307780002, 60307780003, 60307780004

METHOD BLANK: 1704591

Matrix: Water

Associated Lab Samples: 60307780001, 60307780002, 60307780003, 60307780004

Parameter	Act ± Unc (MDC) Carr Trac	Units	Analyzed	Qualifiers
Radium-226	0.561 ± 0.441 (0.613) C:NA T:89%	pCi/L	07/15/19 12:27	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL - RADIOCHEMISTRY

Project: JEC FAA CCR

Pace Project No.: 60307780

QC Batch: 350657

Analysis Method: EPA 904.0

QC Batch Method: EPA 904.0

Analysis Description: 904.0 Radium 228

Associated Lab Samples: 60307780001, 60307780002, 60307780003, 60307780004

METHOD BLANK: 1704592

Matrix: Water

Associated Lab Samples: 60307780001, 60307780002, 60307780003, 60307780004

Parameter	Act ± Unc (MDC) Carr Trac	Units	Analyzed	Qualifiers
Radium-228	0.0658 ± 0.313 (0.715) C:82% T:76%	pCi/L	07/11/19 15:13	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

### REPORT OF LABORATORY ANALYSIS

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## QUALIFIERS

Project: JEC FAA CCR

Pace Project No.: 60307780

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### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Act - Activity

Unc - Uncertainty: SDWA = 1.96 sigma count uncertainty, all other matrices = Expanded Uncertainty (95% confidence interval).

Gamma Spec = Expanded Uncertainty (95.4% Confidence Interval)

(MDC) - Minimum Detectable Concentration

Trac - Tracer Recovery (%)

Carr - Carrier Recovery (%)

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### LABORATORIES

PASI-PA Pace Analytical Services - Greensburg

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC FAA CCR

Pace Project No.: 60307780

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60307780001	FAA-3_062319	EPA 903.1	350656		
60307780002	FAA-6_062319	EPA 903.1	350656		
60307780003	FAA-4_062319	EPA 903.1	350656		
60307780004	FAA-5_062319	EPA 903.1	350656		
60307780001	FAA-3_062319	EPA 904.0	350657		
60307780002	FAA-6_062319	EPA 904.0	350657		
60307780003	FAA-4_062319	EPA 904.0	350657		
60307780004	FAA-5_062319	EPA 904.0	350657		
60307780001	FAA-3_062319	Total Radium Calculation	351806		
60307780002	FAA-6_062319	Total Radium Calculation	351806		
60307780003	FAA-4_062319	Total Radium Calculation	351806		
60307780004	FAA-5_062319	Total Radium Calculation	351806		

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# CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Page: \_\_\_\_\_ of \_\_\_\_\_

<b>Section A</b> Required Client Information:		<b>Section B</b> Required Project Information:		<b>Section C</b> Invoice Information:	
Company: WESTAR ENERGY		Report To: <del>Brandon Griffin</del> <i>Adam Kneeling</i>		Attention: Jared Morrison	
Address: 818 Kansas Ave Topeka, KS 66612		Copy To: Jared Morrison, Heath Horny		Company Name: WESTAR ENERGY	
Email To: <del>brandon.griffin@westarenergy.com</del>		Purchase Order No.: 10JEC-0000040819		Address: SEE SECTION A	
Phone: (785) 575-8135 Fax:		Project Name: JEC FAA CCR		Pace Quote Reference:	
Requested Due Date/TAT: 15 Day		Project Number:		Pace Project Manager: Heather Wilson, 913-563-1407	
				Pace Profile #: 9657, 2	
				<b>REGULATORY AGENCY</b>	
				<input checked="" type="checkbox"/> NPDES <input type="checkbox"/> GROUND WATER <input type="checkbox"/> DRINKING WATER <input type="checkbox"/> UST <input type="checkbox"/> RCRA <input type="checkbox"/> OTHER _____	
				Site Location: _____	
				STATE: KS	

ITEM #	Section D Required Client Information	Valid Matrix Codes MATRIX CODE	COLLECTED	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives											Requested Analysis Filtered (Y/N)			Residual Chlorine (Y/N)	Pace Project No./ Lab I.D.		
						DATE	TIME	DATE	TIME	Unpreserved	H <sub>2</sub> SO <sub>4</sub>	HNO <sub>3</sub>	HCl	NaOH	Na <sub>2</sub> S <sub>2</sub> O <sub>3</sub>	Methanol	Other	Analysis Test	Radium-226			Radium-228	Total Radium
1	FAA-3-062319	WT G	06/23 1818	2											X	X	X		01				
2	FAA-6-062319	WT G	06/23 1917	2											X	X	X		02				
3	FAA-4-062419	WT G	06/24 750	2											X	X	X		03				
4	FAA-5-062419	WT G	06/24 855	2											X	X	X		04				
5																							
6																							
7																							
8																							
9																							
10																							
11																							
12																							

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS
*200.7 Total Metals: Ba, Be, Cr, Pb, Li	Eli Fredrickson	06/26	1800	Vivian Pace	06/26	930	NA N Y Y
**200.8 Total Metals: Co, As, Se, Mo, Cd, Sb, Tl							

<b>SAMPLER NAME AND SIGNATURE</b>		Temp in °C	Received on Ice (Y/N)	Custody Sealed Cooler (Y/N)	Samples Intact (Y/N)
PRINT Name of SAMPLER:	<i>Eli Fredrickson</i>				
SIGNATURE of SAMPLER:	<i>Eli Fredrickson</i>	DATE Signed (MM/DD/YY):	<i>06/26/19</i>		

Page 16 of 20

Pittsburgh Lab Sample Condition Upon Receipt



Client Name: PAPE-KS

Project # \_\_\_\_\_

Courier:  Fed Ex  UPS  USPS  Client  Commercial  Pace Other \_\_\_\_\_

Tracking #: 10078249 9010

Label _____
LIMS Login _____

Custody Seal on Cooler/Box Present:  yes  no    Seals intact:  yes  no

Thermometer Used NA    Type of Ice: Wet Blue None

Cooler Temperature Observed Temp \_\_\_\_\_ °C    Correction Factor: \_\_\_\_\_ °C    Final Temp: \_\_\_\_\_ °C

Temp should be above freezing to 6°C

Comments:	Yes	No	N/A	pH paper Lot#	Date and Initials of person examining contents:
				<u>1014381</u>	<u>MG 02/19</u>
Chain of Custody Present:	/				
Chain of Custody Filled Out:	/				
Chain of Custody Relinquished:	/				
Sampler Name & Signature on COC:	/				
Sample Labels match COC:	/				
-Includes date/time/ID      Matrix: <u>WT</u>					
Samples Arrived within Hold Time:	/				
Short Hold Time Analysis (<72hr remaining):	/				
Rush Turn Around Time Requested:	/				
Sufficient Volume:	/				
Correct Containers Used:	/				
-Pace Containers Used:	/				
Containers Intact:	/				
Orthophosphate field filtered	/				
Hex Cr Aqueous sample field filtered	/				
Organic Samples checked for dechlorination:	/				
Filtered volume received for Dissolved tests	/				
All containers have been checked for preservation.	/				
exceptions: VOA, coliform, TOC, O&G, Phenolics, Radon, Non-aqueous matrix					
All containers meet method preservation requirements.	/			Initial when completed <u>MG</u>	Date/time of preservation
				Lot # of added preservative	
Headspace in VOA Vials (>6mm):	/				
Trip Blank Present:	/				
Trip Blank Custody Seals Present	/				
Rad Samples Screened < 0.5 mrem/hr	/			Initial when completed: <u>MG</u>	Date: <u>02/19</u>

Client Notification/ Resolution:

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_ Contacted By: \_\_\_\_\_

Comments/ Resolution: \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

A check in this box indicates that additional information has been stored in ereports.

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e. out of hold, incorrect preservative, out of temp, incorrect containers)

\*PM review is documented electronically in LIMS. When the Project Manager closes the SRF Review schedule in LIMS. The review is in the Status section of the Workorder Edit Screen.





Pittsburgh Lab Sample Condition Upon Receipt

# 30312121



Client Name: PAPE-KP

Project # \_\_\_\_\_

Courier:  Fed Ex  UPS  USPS  Client  Commercial  Pace Other \_\_\_\_\_

Tracking #: 10078249 9010

Label <u>MA</u>
LIMS Login <u>MA</u>

Custody Seal on Cooler/Box Present:  yes  no    Seals intact:  yes  no

Thermometer Used NA    Type of Ice: Wet Blue None

Cooler Temperature \_\_\_\_\_ Observed Temp \_\_\_\_\_ °C    Correction Factor: \_\_\_\_\_ °C    Final Temp: \_\_\_\_\_ °C

Temp should be above freezing to 6°C

pH paper Lot# <u>1014381</u>	Date and Initials of person examining contents: <u>MA 02/11/19</u>
------------------------------	--------------------------------------------------------------------

Comments:

	Yes	No	N/A	
Chain of Custody Present:	/			1.
Chain of Custody Filled Out:	/			2.
Chain of Custody Relinquished:	/			3.
Sampler Name & Signature on COC:	/			4.
Sample Labels match COC:	/			5.
-Includes date/time/ID      Matrix: <u>WT</u>				
Samples Arrived within Hold Time:	/			6.
Short Hold Time Analysis (<72hr remaining):		/		7.
Rush Turn Around Time Requested:	/			8.
Sufficient Volume:	/			9.
Correct Containers Used:	/			10.
-Pace Containers Used:	/			
Containers Intact:	/			11.
Orthophosphate field filtered			/	12.
Hex Cr Aqueous sample field filtered			/	13.
Organic Samples checked for dechlorination:			/	14.
Filtered volume received for Dissolved tests			/	15.
All containers have been checked for preservation.	/			16.
exceptions: VOA, coliform, TOC, O&G, Phenolics, Radon, Non-aqueous matrix				<u>pH &lt; 2</u>
All containers meet method preservation requirements.	/			Initial when completed: <u>MA</u> Date/time of preservation: _____
				Lot # of added preservative: _____
Headspace in VOA Vials (>6mm):			/	17.
Trip Blank Present:			/	18.
Trip Blank Custody Seals Present			/	
Rad Samples Screened < 0.5 mrem/hr	/			Initial when completed: <u>MA</u> Date: <u>02/11/19</u>

Client Notification/ Resolution:

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_ Contacted By: \_\_\_\_\_

Comments/ Resolution: \_\_\_\_\_

A check in this box indicates that additional information has been stored in ereports.

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e. out of hold, incorrect preservative, out of temp, incorrect containers)

\*PM review is documented electronically in LIMS. When the Project Manager closes the SRF Review schedule in LIMS. The review is in the Status section of the Workorder Edit Screen.

**ATTACHMENT 1-3**  
**September 2019 Sampling Event**  
**Laboratory Analytical Report**



October 22, 2019

JD Schlegel  
KCP&L and Westar, Evergy Companies  
818 Kansas Avenue  
Topeka, KS 66612

RE: Project: JEC FAL CCR  
Pace Project No.: 60314889

Dear JD Schlegel:

Enclosed are the analytical results for sample(s) received by the laboratory on September 13, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

Revised Report\_rev.1 The sample containers were mislabeled by the lab on arrival for the samples 60314889-003 & -004. Therefore, the results were switched to reflect the correct results for the samples.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Heather Wilson  
heather.wilson@pacelabs.com  
1(913)563-1407  
Project Manager

Enclosures

cc: Bob Beck, Kansas City Power & Light Company  
HEATH HORYNA, WESTAR ENERGY  
Andrew Hare, KCP&L and Westar, Evergy Companies  
Jake Humphrey, KCP&L and Westar, Evergy Companies  
Adam Kneeling, Haley & Aldrich, Inc.

JARED MORRISON, KCP&L and Westar, Evergy  
Companies  
Melissa Michels, KCP&L and Westar, Evergy Companies  
Danielle Zinmaster, Haley & Aldrich



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: JEC FAL CCR

Pace Project No.: 60314889

---

### **Kansas Certification IDs**

9608 Loiret Boulevard, Lenexa, KS 66219

Missouri Inorganic Drinking Water Certification #: 10090

Arkansas Drinking Water

Arkansas Certification #: 19-016-0

Arkansas Drinking Water

Illinois Certification #: 004455

Iowa Certification #: 118

Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055

Nevada Certification #: KS000212018-1

Oklahoma Certification #: 9205/9935

Florida: Cert E871149 SEKS WET

Texas Certification #: T104704407-18-11

Utah Certification #: KS000212018-8

Illinois Certification #: 004592

Kansas Field Laboratory Accreditation: # E-92587

Missouri SEKS Micro Certification: 10070

---

## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: JEC FAL CCR

Pace Project No.: 60314889

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60314889001	MW-FAA-3	Water	09/12/19 12:58	09/13/19 16:20
60314889002	MW-FAA-4	Water	09/12/19 14:59	09/13/19 16:20
60314889003	MW-FAA-6	Water	09/12/19 11:05	09/13/19 16:20
60314889004	MW-FAA-5	Water	09/12/19 16:55	09/13/19 16:20
60314889005	DUPLICATE	Water	09/12/19 11:05	09/13/19 16:20

## REPORT OF LABORATORY ANALYSIS

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### SAMPLE ANALYTE COUNT

Project: JEC FAL CCR

Pace Project No.: 60314889

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60314889001	MW-FAA-3	EPA 200.7	JDE	4	PASI-K
		EPA 200.8	EMR	4	PASI-K
		EPA 245.1	HKC	1	PASI-K
		SM 2540C	LDF	1	PASI-K
		SM 4500-H+B	AJS2	1	PASI-K
		EPA 300.0	MJK	3	PASI-K
60314889002	MW-FAA-4	EPA 200.7	JDE	4	PASI-K
		EPA 200.8	EMR	4	PASI-K
		EPA 245.1	HKC	1	PASI-K
		SM 2540C	LDF	1	PASI-K
		SM 4500-H+B	AJS2	1	PASI-K
		EPA 300.0	MJK	3	PASI-K
60314889003	MW-FAA-6	EPA 200.7	JDE	4	PASI-K
		EPA 200.8	EMR	4	PASI-K
		EPA 245.1	HKC	1	PASI-K
		SM 2540C	LDF	1	PASI-K
		SM 4500-H+B	AJS2	1	PASI-K
		EPA 300.0	MJK	3	PASI-K
60314889004	MW-FAA-5	EPA 200.7	JDE	4	PASI-K
		EPA 200.8	EMR	4	PASI-K
		EPA 245.1	HKC	1	PASI-K
		SM 2540C	LDF	1	PASI-K
		SM 4500-H+B	AJS2	1	PASI-K
		EPA 300.0	MJK	3	PASI-K
60314889005	DUPLICATE	EPA 200.7	JDE	4	PASI-K
		EPA 200.8	EMR	4	PASI-K
		EPA 245.1	HKC	1	PASI-K
		SM 2540C	LDF	1	PASI-K
		SM 4500-H+B	AJS2	1	PASI-K
		EPA 300.0	MJK	3	PASI-K

### REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAL CCR

Pace Project No.: 60314889

---

**Method:** EPA 200.7

**Description:** 200.7 Metals, Total

**Client:** Evergy Kansas Central, Inc.

**Date:** October 22, 2019

**General Information:**

5 samples were analyzed for EPA 200.7. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 200.7 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 609870

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60314889001,60314889004

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2491452)
  - Calcium
- MSD (Lab ID: 2491453)
  - Calcium

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAL CCR

Pace Project No.: 60314889

---

**Method:** EPA 200.8

**Description:** 200.8 MET ICPMS

**Client:** Evergy Kansas Central, Inc.

**Date:** October 22, 2019

**General Information:**

5 samples were analyzed for EPA 200.8. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 200.8 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Internal Standards:**

All internal standards were within QC limits with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAL CCR

Pace Project No.: 60314889

---

**Method:** EPA 245.1

**Description:** 245.1 Mercury

**Client:** Evergy Kansas Central, Inc.

**Date:** October 22, 2019

**General Information:**

5 samples were analyzed for EPA 245.1. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Sample Preparation:**

The samples were prepared in accordance with EPA 245.1 with any exceptions noted below.

**Initial Calibrations (including MS Tune as applicable):**

All criteria were within method requirements with any exceptions noted below.

**Continuing Calibration:**

All criteria were within method requirements with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAL CCR

Pace Project No.: 60314889

---

**Method:** SM 2540C

**Description:** 2540C Total Dissolved Solids

**Client:** Evergy Kansas Central, Inc.

**Date:** October 22, 2019

**General Information:**

5 samples were analyzed for SM 2540C. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Duplicate Sample:**

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAL CCR

Pace Project No.: 60314889

---

**Method:** SM 4500-H+B

**Description:** 4500H+ pH, Electrometric

**Client:** Evergy Kansas Central, Inc.

**Date:** October 22, 2019

### General Information:

5 samples were analyzed for SM 4500-H+B. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

### Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

H6: Analysis initiated outside of the 15 minute EPA required holding time.

- DUPLICATE (Lab ID: 60314889005)
- MW-FAA-3 (Lab ID: 60314889001)
- MW-FAA-4 (Lab ID: 60314889002)
- MW-FAA-5 (Lab ID: 60314889004)
- MW-FAA-6 (Lab ID: 60314889003)

### Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

### Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

### Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

### Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

QC Batch: 610915

D6: The precision between the sample and sample duplicate exceeded laboratory control limits.

- DUP (Lab ID: 2495720)
- pH at 25 Degrees C

### Additional Comments:

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAL CCR

Pace Project No.: 60314889

---

**Method:** EPA 300.0

**Description:** 300.0 IC Anions 28 Days

**Client:** Evergy Kansas Central, Inc.

**Date:** October 22, 2019

**General Information:**

5 samples were analyzed for EPA 300.0. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 609891

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60314427001,60314889005

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2491579)
  - Chloride
- MSD (Lab ID: 2491578)
  - Chloride

**Additional Comments:**

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: JEC FAL CCR

Pace Project No.: 60314889

Sample: MW-FAA-3		Lab ID: 60314889001	Collected: 09/12/19 12:58	Received: 09/13/19 16:20	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7						
Barium, Total Recoverable	<b>0.032</b>	mg/L	0.0050	1	09/17/19 12:39	09/18/19 10:37	7440-39-3	
Boron, Total Recoverable	<b>0.93</b>	mg/L	0.10	1	09/17/19 12:39	09/18/19 10:37	7440-42-8	
Calcium, Total Recoverable	<b>204</b>	mg/L	0.20	1	09/17/19 12:39	09/18/19 10:37	7440-70-2	M1
Lithium	<b>0.015</b>	mg/L	0.010	1	09/17/19 12:39	09/18/19 10:37	7439-93-2	
<b>200.8 MET ICPMS</b>		Analytical Method: EPA 200.8 Preparation Method: EPA 200.8						
Arsenic, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:39	7440-38-2	
Cobalt, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:39	7440-48-4	
Molybdenum, Total Recoverable	<b>0.013</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:39	7439-98-7	
Selenium, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:39	7782-49-2	
<b>245.1 Mercury</b>		Analytical Method: EPA 245.1 Preparation Method: EPA 245.1						
Mercury	<b>&lt;0.20</b>	ug/L	0.20	1	09/17/19 09:36	09/17/19 13:02	7439-97-6	
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C						
Total Dissolved Solids	<b>1570</b>	mg/L	13.3	1		09/17/19 09:50		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B						
pH at 25 Degrees C	<b>7.4</b>	Std. Units	0.10	1		09/23/19 11:06		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0						
Chloride	<b>79.3</b>	mg/L	20.0	20		09/17/19 19:05	16887-00-6	
Fluoride	<b>&lt;0.20</b>	mg/L	0.20	1		09/17/19 18:50	16984-48-8	
Sulfate	<b>809</b>	mg/L	100	100		09/17/19 19:20	14808-79-8	

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: JEC FAL CCR

Pace Project No.: 60314889

Sample: MW-FAA-4	Lab ID: 60314889002	Collected: 09/12/19 14:59		Received: 09/13/19 16:20		Matrix: Water		
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7						
Barium, Total Recoverable	<b>0.051</b>	mg/L	0.0050	1	09/17/19 12:39	09/18/19 10:44	7440-39-3	
Boron, Total Recoverable	<b>0.62</b>	mg/L	0.10	1	09/17/19 12:39	09/18/19 10:44	7440-42-8	
Calcium, Total Recoverable	<b>154</b>	mg/L	0.20	1	09/17/19 12:39	09/18/19 10:44	7440-70-2	
Lithium	<b>0.020</b>	mg/L	0.010	1	09/17/19 12:39	09/18/19 10:44	7439-93-2	
<b>200.8 MET ICPMS</b>		Analytical Method: EPA 200.8 Preparation Method: EPA 200.8						
Arsenic, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:41	7440-38-2	
Cobalt, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:41	7440-48-4	
Molybdenum, Total Recoverable	<b>0.0054</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:41	7439-98-7	
Selenium, Total Recoverable	<b>0.0016</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:41	7782-49-2	
<b>245.1 Mercury</b>		Analytical Method: EPA 245.1 Preparation Method: EPA 245.1						
Mercury	<b>&lt;0.20</b>	ug/L	0.20	1	09/17/19 09:36	09/17/19 13:04	7439-97-6	
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C						
Total Dissolved Solids	<b>1090</b>	mg/L	10.0	1		09/17/19 09:51		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B						
pH at 25 Degrees C	<b>7.3</b>	Std. Units	0.10	1		09/17/19 16:13		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0						
Chloride	<b>75.7</b>	mg/L	20.0	20		09/17/19 20:20	16887-00-6	
Fluoride	<b>0.32</b>	mg/L	0.20	1		09/17/19 20:05	16984-48-8	
Sulfate	<b>414</b>	mg/L	100	100		09/17/19 20:35	14808-79-8	

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## ANALYTICAL RESULTS

Project: JEC FAL CCR

Pace Project No.: 60314889

Sample: MW-FAA-6	Lab ID: 60314889003	Collected: 09/12/19 11:05	Received: 09/13/19 16:20	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>								
Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Barium, Total Recoverable	<b>0.024</b>	mg/L	0.0050	1	09/17/19 12:39	09/18/19 10:46	7440-39-3	
Boron, Total Recoverable	<b>3.5</b>	mg/L	0.10	1	09/17/19 12:39	09/18/19 10:46	7440-42-8	
Calcium, Total Recoverable	<b>121</b>	mg/L	0.20	1	09/17/19 12:39	09/18/19 10:46	7440-70-2	
Lithium	<b>0.012</b>	mg/L	0.010	1	09/17/19 12:39	09/18/19 10:46	7439-93-2	
<b>200.8 MET ICPMS</b>								
Analytical Method: EPA 200.8 Preparation Method: EPA 200.8								
Arsenic, Total Recoverable	<b>0.0073</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:43	7440-38-2	
Cobalt, Total Recoverable	<b>0.0015</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:43	7440-48-4	
Molybdenum, Total Recoverable	<b>0.58</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:43	7439-98-7	
Selenium, Total Recoverable	<b>0.0013</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:43	7782-49-2	
<b>245.1 Mercury</b>								
Analytical Method: EPA 245.1 Preparation Method: EPA 245.1								
Mercury	<b>&lt;0.20</b>	ug/L	0.20	1	09/17/19 09:36	09/17/19 13:06	7439-97-6	
<b>2540C Total Dissolved Solids</b>								
Analytical Method: SM 2540C								
Total Dissolved Solids	<b>3100</b>	mg/L	40.0	1		09/17/19 09:51		
<b>4500H+ pH, Electrometric</b>								
Analytical Method: SM 4500-H+B								
pH at 25 Degrees C	<b>7.7</b>	Std. Units	0.10	1		09/17/19 16:17		H6
<b>300.0 IC Anions 28 Days</b>								
Analytical Method: EPA 300.0								
Chloride	<b>73.2</b>	mg/L	20.0	20		09/17/19 21:05	16887-00-6	
Fluoride	<b>0.97</b>	mg/L	0.20	1		09/17/19 20:50	16984-48-8	
Sulfate	<b>1720</b>	mg/L	100	100		09/17/19 21:19	14808-79-8	

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## ANALYTICAL RESULTS

Project: JEC FAL CCR

Pace Project No.: 60314889

Sample: MW-FAA-5	Lab ID: 60314889004	Collected: 09/12/19 16:55	Received: 09/13/19 16:20	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>								
Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Barium, Total Recoverable	<b>&lt;0.0050</b>	mg/L	0.0050	1	09/17/19 12:39	09/18/19 10:49	7440-39-3	
Boron, Total Recoverable	<b>1.5</b>	mg/L	0.10	1	09/17/19 12:39	09/18/19 10:49	7440-42-8	
Calcium, Total Recoverable	<b>313</b>	mg/L	0.20	1	09/17/19 12:39	09/18/19 10:49	7440-70-2	
Lithium	<b>0.11</b>	mg/L	0.010	1	09/17/19 12:39	09/18/19 10:49	7439-93-2	
<b>200.8 MET ICPMS</b>								
Analytical Method: EPA 200.8 Preparation Method: EPA 200.8								
Arsenic, Total Recoverable	<b>&lt;0.0010</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:45	7440-38-2	
Cobalt, Total Recoverable	<b>0.0040</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:45	7440-48-4	
Molybdenum, Total Recoverable	<b>0.034</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:45	7439-98-7	
Selenium, Total Recoverable	<b>0.0033</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:45	7782-49-2	
<b>245.1 Mercury</b>								
Analytical Method: EPA 245.1 Preparation Method: EPA 245.1								
Mercury	<b>&lt;0.20</b>	ug/L	0.20	1	09/17/19 09:36	09/17/19 13:08	7439-97-6	
<b>2540C Total Dissolved Solids</b>								
Analytical Method: SM 2540C								
Total Dissolved Solids	<b>2840</b>	mg/L	20.0	1		09/17/19 09:51		
<b>4500H+ pH, Electrometric</b>								
Analytical Method: SM 4500-H+B								
pH at 25 Degrees C	<b>7.1</b>	Std. Units	0.10	1		09/17/19 16:18		H6
<b>300.0 IC Anions 28 Days</b>								
Analytical Method: EPA 300.0								
Chloride	<b>105</b>	mg/L	20.0	20		09/17/19 21:49	16887-00-6	
Fluoride	<b>&lt;0.20</b>	mg/L	0.20	1		09/17/19 21:34	16984-48-8	
Sulfate	<b>1560</b>	mg/L	100	100		09/17/19 22:04	14808-79-8	

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## ANALYTICAL RESULTS

Project: JEC FAL CCR

Pace Project No.: 60314889

<b>Sample: DUPLICATE</b>		<b>Lab ID: 60314889005</b>	Collected: 09/12/19 11:05	Received: 09/13/19 16:20	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>200.7 Metals, Total</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7						
Barium, Total Recoverable	<b>0.024</b>	mg/L	0.0050	1	09/17/19 12:39	09/18/19 10:54	7440-39-3	
Boron, Total Recoverable	<b>3.7</b>	mg/L	0.10	1	09/17/19 12:39	09/18/19 10:54	7440-42-8	
Calcium, Total Recoverable	<b>118</b>	mg/L	0.20	1	09/17/19 12:39	09/18/19 10:54	7440-70-2	
Lithium	<b>0.011</b>	mg/L	0.010	1	09/17/19 12:39	09/18/19 10:54	7439-93-2	
<b>200.8 MET ICPMS</b>		Analytical Method: EPA 200.8 Preparation Method: EPA 200.8						
Arsenic, Total Recoverable	<b>0.0079</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:52	7440-38-2	
Cobalt, Total Recoverable	<b>0.0015</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:52	7440-48-4	
Molybdenum, Total Recoverable	<b>0.62</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:52	7439-98-7	
Selenium, Total Recoverable	<b>0.0013</b>	mg/L	0.0010	1	09/17/19 13:00	09/18/19 13:52	7782-49-2	
<b>245.1 Mercury</b>		Analytical Method: EPA 245.1 Preparation Method: EPA 245.1						
Mercury	<b>&lt;0.20</b>	ug/L	0.20	1	09/17/19 09:36	09/17/19 13:11	7439-97-6	
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C						
Total Dissolved Solids	<b>2900</b>	mg/L	40.0	1		09/17/19 09:51		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B						
pH at 25 Degrees C	<b>7.8</b>	Std. Units	0.10	1		09/17/19 16:20		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0						
Chloride	<b>&lt;1.0</b>	mg/L	1.0	1		09/17/19 23:19	16887-00-6	M1
Fluoride	<b>&lt;0.20</b>	mg/L	0.20	1		09/17/19 23:19	16984-48-8	
Sulfate	<b>17.5</b>	mg/L	1.0	1		09/17/19 23:19	14808-79-8	

## REPORT OF LABORATORY ANALYSIS

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**QUALITY CONTROL DATA**

Project: JEC FAL CCR

Pace Project No.: 60314889

QC Batch: 609743 Analysis Method: EPA 245.1  
 QC Batch Method: EPA 245.1 Analysis Description: 245.1 Mercury  
 Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

METHOD BLANK: 2490975 Matrix: Water  
 Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	ug/L	<0.20	0.20	09/17/19 12:50	

LABORATORY CONTROL SAMPLE: 2490976

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	5	4.9	98	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2490977 2490978

Parameter	Units	60314773001 Result	MS		MSD		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
			Spike Conc.	MS Result	Spike Conc.	MSD Result						
Mercury	ug/L	ND	5	4.8	5	4.7	95	94	70-130	0	20	

MATRIX SPIKE SAMPLE: 2490979

Parameter	Units	60314889001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	<0.20	5	4.7	94	70-130	

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**REPORT OF LABORATORY ANALYSIS**

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**QUALITY CONTROL DATA**

Project: JEC FAL CCR

Pace Project No.: 60314889

QC Batch: 609870 Analysis Method: EPA 200.7  
 QC Batch Method: EPA 200.7 Analysis Description: 200.7 Metals, Total  
 Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

METHOD BLANK: 2491450 Matrix: Water  
 Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Barium	mg/L	<0.0050	0.0050	09/18/19 10:32	
Boron	mg/L	<0.10	0.10	09/18/19 10:32	
Calcium	mg/L	<0.20	0.20	09/18/19 10:32	
Lithium	mg/L	<0.010	0.010	09/18/19 10:32	

LABORATORY CONTROL SAMPLE: 2491451

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Barium	mg/L	1	0.98	98	85-115	
Boron	mg/L	1	0.93	93	85-115	
Calcium	mg/L	10	10	100	85-115	
Lithium	mg/L	1	0.93	93	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2491452 2491453

Parameter	Units	60314889001		60314889004		MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		Result	MS Spike Conc.	MSD Spike Conc.	MS Result								
Barium	mg/L	0.032	1	1	1.1	1.0	103	101	70-130	1	20		
Boron	mg/L	0.93	1	1	2.0	2.0	104	103	70-130	1	20		
Calcium	mg/L	204	10	10	223	220	194	158	70-130	2	20	M1	
Lithium	mg/L	0.015	1	1	1.0	1.0	102	101	70-130	1	20		

MATRIX SPIKE SAMPLE: 2491454

Parameter	Units	60314889004 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Barium	mg/L	<0.0050	1	0.99	99	70-130	
Boron	mg/L	1.5	1	2.4	94	70-130	
Calcium	mg/L	313	10	323	97	70-130	
Lithium	mg/L	0.11	1	1.1	98	70-130	

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**QUALITY CONTROL DATA**

Project: JEC FAL CCR

Pace Project No.: 60314889

QC Batch: 609880 Analysis Method: EPA 200.8  
 QC Batch Method: EPA 200.8 Analysis Description: 200.8 MET  
 Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

METHOD BLANK: 2491507 Matrix: Water  
 Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	mg/L	<0.0010	0.0010	09/18/19 13:26	
Cobalt	mg/L	<0.0010	0.0010	09/18/19 13:26	
Molybdenum	mg/L	<0.0010	0.0010	09/18/19 13:26	
Selenium	mg/L	<0.0010	0.0010	09/18/19 13:26	

LABORATORY CONTROL SAMPLE: 2491508

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/L	0.04	0.039	98	85-115	
Cobalt	mg/L	0.04	0.038	95	85-115	
Molybdenum	mg/L	0.04	0.039	98	85-115	
Selenium	mg/L	0.04	0.040	101	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2491509 2491510

Parameter	Units	60314536001		MS		MSD		% Rec	% Rec	% Rec Limits	RPD	Max RPD	Qual
		Result	Conc.	Spike Conc.	Conc.	Result	Result						
Arsenic	mg/L	ND	0.04	0.04	0.042	0.041	103	102	70-130	1	20		
Cobalt	mg/L	ND	0.04	0.04	0.041	0.041	102	102	70-130	1	20		
Molybdenum	mg/L	2.4 ug/L	0.04	0.04	0.045	0.045	107	106	70-130	1	20		
Selenium	mg/L	ND	0.04	0.04	0.039	0.039	97	96	70-130	1	20		

MATRIX SPIKE SAMPLE: 2491511

Parameter	Units	60314621001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/L	ND	0.04	0.041	101	70-130	
Cobalt	mg/L	ND	0.04	0.039	96	70-130	
Molybdenum	mg/L	1.6 ug/L	0.04	0.042	101	70-130	
Selenium	mg/L	ND	0.04	0.039	96	70-130	

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### QUALITY CONTROL DATA

Project: JEC FAL CCR

Pace Project No.: 60314889

QC Batch: 609756

Analysis Method: SM 2540C

QC Batch Method: SM 2540C

Analysis Description: 2540C Total Dissolved Solids

Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

METHOD BLANK: 2491030

Matrix: Water

Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	<5.0	5.0	09/17/19 09:49	

LABORATORY CONTROL SAMPLE: 2491031

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	1000	1040	104	80-120	

SAMPLE DUPLICATE: 2491032

Parameter	Units	60314889001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	1570	1550	1	10	

SAMPLE DUPLICATE: 2491033

Parameter	Units	60314890001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	1450	1480	2	10	

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**QUALITY CONTROL DATA**

Project: JEC FAL CCR

Pace Project No.: 60314889

QC Batch: 609905 Analysis Method: SM 4500-H+B

QC Batch Method: SM 4500-H+B Analysis Description: 4500H+B pH

Associated Lab Samples: 60314889002, 60314889003, 60314889004, 60314889005

SAMPLE DUPLICATE: 2491637

Parameter	Units	60314260003 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	8.9	9.0	1	5	H6

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### QUALITY CONTROL DATA

Project: JEC FAL CCR

Pace Project No.: 60314889

QC Batch: 610915 Analysis Method: SM 4500-H+B

QC Batch Method: SM 4500-H+B Analysis Description: 4500H+B pH

Associated Lab Samples: 60314889001

SAMPLE DUPLICATE: 2495720

Parameter	Units	60314466001 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	7.2	7.7	6	5	D6,H6

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### QUALITY CONTROL DATA

Project: JEC FAL CCR  
Pace Project No.: 60314889

QC Batch: 609891 Analysis Method: EPA 300.0  
QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions  
Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

METHOD BLANK: 2491575 Matrix: Water  
Associated Lab Samples: 60314889001, 60314889002, 60314889003, 60314889004, 60314889005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	09/17/19 10:36	
Fluoride	mg/L	<0.20	0.20	09/17/19 10:36	
Sulfate	mg/L	<1.0	1.0	09/17/19 10:36	

LABORATORY CONTROL SAMPLE: 2491576

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	5.0	99	90-110	
Fluoride	mg/L	2.5	2.6	105	90-110	
Sulfate	mg/L	5	5.5	110	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2491577 2491578

Parameter	Units	60314427001		MS		MSD		MS		MSD		% Rec Limits	RPD	Max RPD	Qual
		Result	Conc.	Spike Conc.	Conc.	Result	Result	% Rec	% Rec						
Chloride	mg/L	381	250	250	594	551	85	68	80-120	7	15	M1			
Fluoride	mg/L	ND	125	125	140	132	110	104	80-120	6	15				
Sulfate	mg/L	ND	250	250	292	275	109	103	80-120	6	15				

MATRIX SPIKE SAMPLE: 2491579

Parameter	Units	60314889005 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	<1.0	250	449	179	80-120	M1
Fluoride	mg/L	<0.20	125	132	105	80-120	
Sulfate	mg/L	17.5	250	310	117	80-120	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

### REPORT OF LABORATORY ANALYSIS

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## QUALIFIERS

Project: JEC FAL CCR

Pace Project No.: 60314889

---

### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### LABORATORIES

PASI-K Pace Analytical Services - Kansas City

### ANALYTE QUALIFIERS

D6 The precision between the sample and sample duplicate exceeded laboratory control limits.

H6 Analysis initiated outside of the 15 minute EPA required holding time.

M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC FAL CCR

Pace Project No.: 60314889

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60314889001	MW-FAA-3	EPA 200.7	609870	EPA 200.7	609918
60314889002	MW-FAA-4	EPA 200.7	609870	EPA 200.7	609918
60314889003	MW-FAA-6	EPA 200.7	609870	EPA 200.7	609918
60314889004	MW-FAA-5	EPA 200.7	609870	EPA 200.7	609918
60314889005	DUPLICATE	EPA 200.7	609870	EPA 200.7	609918
60314889001	MW-FAA-3	EPA 200.8	609880	EPA 200.8	609910
60314889002	MW-FAA-4	EPA 200.8	609880	EPA 200.8	609910
60314889003	MW-FAA-6	EPA 200.8	609880	EPA 200.8	609910
60314889004	MW-FAA-5	EPA 200.8	609880	EPA 200.8	609910
60314889005	DUPLICATE	EPA 200.8	609880	EPA 200.8	609910
60314889001	MW-FAA-3	EPA 245.1	609743	EPA 245.1	609790
60314889002	MW-FAA-4	EPA 245.1	609743	EPA 245.1	609790
60314889003	MW-FAA-6	EPA 245.1	609743	EPA 245.1	609790
60314889004	MW-FAA-5	EPA 245.1	609743	EPA 245.1	609790
60314889005	DUPLICATE	EPA 245.1	609743	EPA 245.1	609790
60314889001	MW-FAA-3	SM 2540C	609756		
60314889002	MW-FAA-4	SM 2540C	609756		
60314889003	MW-FAA-6	SM 2540C	609756		
60314889004	MW-FAA-5	SM 2540C	609756		
60314889005	DUPLICATE	SM 2540C	609756		
60314889001	MW-FAA-3	SM 4500-H+B	610915		
60314889002	MW-FAA-4	SM 4500-H+B	609905		
60314889003	MW-FAA-6	SM 4500-H+B	609905		
60314889004	MW-FAA-5	SM 4500-H+B	609905		
60314889005	DUPLICATE	SM 4500-H+B	609905		
60314889001	MW-FAA-3	EPA 300.0	609891		
60314889002	MW-FAA-4	EPA 300.0	609891		
60314889003	MW-FAA-6	EPA 300.0	609891		
60314889004	MW-FAA-5	EPA 300.0	609891		
60314889005	DUPLICATE	EPA 300.0	609891		

### REPORT OF LABORATORY ANALYSIS

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Sample Condition Upon Receipt

WO#: 60314889



Client Name: Westar Energy

Courier: FedEx [ ] UPS [ ] VIA [ ] Clay [ ] PEX [ ] ECI [ ] Pace [ ] Xroads [ ] Client [ ] Other [ ]

Tracking #: Pace Shipping Label Used? Yes [ ] No [ ]

Custody Seal on Cooler/Box Present: Yes [ ] No [ ] Seals intact: Yes [ ] No [ ]

Packing Material: Bubble Wrap [ ] Bubble Bags [ ] Foam [ ] None [ ] Other [ ]

Thermometer Used: T-300 Type of Ice: Wet Blue None

Cooler Temperature (°C): As-read 0.2 Corr. Factor 0.0 Corrected 0.2

Date and initials of person examining contents:

PV 9/13/19

Temperature should be above freezing to 6°C

Table with 2 columns: Question/Field and Answer (Yes/No/N/A). Rows include Chain of Custody, Short Hold Time, Rush Turn Around Time, Containers, and various sample checks.

Client Notification/ Resolution: Copy COC to Client? Y / N Field Data Required? Y / N

Person Contacted: Date/Time:

Comments/ Resolution:

Project Manager Review: Date:



# CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Page: \_\_\_\_\_ of \_\_\_\_\_

**Section A**  
Required Client Information:

**Section B**  
Required Project Information:

**Section C**  
Invoice Information:

Company: **WESTAR ENERGY**  
 Address: **818 Kansas Ave**  
**Topeka, KS 66612**  
 Email To: **brandon.l.griffin@westarenergy.com**  
 Phone: **785-575-8135** Fax: \_\_\_\_\_  
 Requested Due Date/TAT: **7 day**

Report To: **Brandon Griffin**  
 Copy To: **Jared Morrison**  
 Purchase Order No.: **10JEC-0000040819**  
 Project Name: **JEC FAL2 CCR**  
 Project Number: \_\_\_\_\_

Attention: \_\_\_\_\_  
 Company Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Pace Quote Reference: \_\_\_\_\_  
 Pace Project Manager: **Heather Wilson 913-563-1407**  
 Pace Profile #: **9657, 1**

**REGULATORY AGENCY**  
 NPDES  GROUND WATER  DRINKING WATER  
 UST  RCRA  OTHER \_\_\_\_\_  
 Site Location: \_\_\_\_\_  
 STATE: **KS**

**Section D**  
Required Client Information

**SAMPLE ID**  
(A-Z, 0-9 / . -)  
Sample IDs MUST BE UNIQUE

Valid Matrix Codes  
 MATRIX CODE  
 DRINKING WATER DW  
 WATER WT  
 WASTE WATER WW  
 PRODUCT P  
 SOIL/SOLID SL  
 OIL OL  
 WIPE WP  
 AIR AR  
 OTHER OT  
 TISSUE TS

MATRIX CODE (see valid codes to left)  
 SAMPLE TYPE (G=GRAB C=COMP)

ITEM #	COLLECTED				SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives							Analysis Test ↓	Y/N ↓
	COMPOSITE START		COMPOSITE END/GRAB				Unpreserved	H <sub>2</sub> SO <sub>4</sub>	HNO <sub>3</sub>	HCl	NaOH	Na <sub>2</sub> S <sub>2</sub> O <sub>3</sub>	Methanol		
	DATE	TIME	DATE	TIME											
1	MW-FAA-3		9/12/19	1258	3	2	1								
2	MW-FAA-4		9/12/19	1459	3	2	1								
3	MW-FAA-5		9/12/19	1655	3	2	1								
4	MW-FAA-6		9/12/19	1105	3	2	1								
5	Duplicate		9/12/19	1105	3	2	1								

**Requested Analysis Filtered (Y/N)**

Analysis Test	Y	N
200.7 Total Metals*	X	X
200.8 Total Metals**	X	X
245.1 Total Hg	X	X
300: Cl, F, SO <sub>4</sub>	X	X
2540C TDS	X	X
4500 H+B	X	Y

Residual Chlorine (Y/N)

**60314889**  
Pace Project No./ Lab I.D.

2BPIU BPIN 001  
002  
003  
004  
005

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS			
200.7 Total Metals*: B, Ca, Ba, Be, Cr, Pb, Li	<i>John Knightly</i>	9/13/19	1620	<i>Salim Pace</i>	9.13.19	1620	0.2	Y	N	Y
200.8 Total Metals**: Sb, As, Cd, Co, Mo, Se, Tl										

**SAMPLER NAME AND SIGNATURE**

PRINT Name of SAMPLER: *John Knightly*

SIGNATURE of SAMPLER: *John Knightly* DATE Signed (MM/DD/YY): **9/12/19**

Temp in °C \_\_\_\_\_  
 Received on Ice (Y/N) \_\_\_\_\_  
 Custody Sealed Cooler (Y/N) \_\_\_\_\_  
 Samples Intact (Y/N) \_\_\_\_\_

\*Important Note: By signing this form you are accepting Pace's NET 30 day payment terms and agreeing to late charges of 1.5% per month for any invoices not paid within 30 days.



October 08, 2019

JD Schlegel  
KCP&L and Westar, Evergy Companies  
818 Kansas Avenue  
Topeka, KS 66612

RE: Project: JEC FAL CCR  
Pace Project No.: 60314891

Dear JD Schlegel:

Enclosed are the analytical results for sample(s) received by the laboratory on September 13, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Heather Wilson  
heather.wilson@pacelabs.com  
1(913)563-1407  
Project Manager

Enclosures

cc: Bob Beck, Kansas City Power & Light Company  
HEATH HORYNA, WESTAR ENERGY  
Andrew Hare, KCP&L and Westar, Evergy Companies  
Jake Humphrey, KCP&L and Westar, Evergy Companies  
Adam Kneeling, Haley & Aldrich, Inc.  
JARED MORRISON, KCP&L and Westar, Evergy  
Companies  
Melissa Michels, Westar Energy  
Danielle Zinmaster, Haley & Aldrich



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: JEC FAL CCR

Pace Project No.: 60314891

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### Pennsylvania Certification IDs

1638 Roseytown Rd Suites 2,3&4, Greensburg, PA 15601

ANAB DOD-ELAP Rad Accreditation #: L2417

Alabama Certification #: 41590

Arizona Certification #: AZ0734

Arkansas Certification

California Certification #: 04222CA

Colorado Certification #: PA01547

Connecticut Certification #: PH-0694

Delaware Certification

EPA Region 4 DW Rad

Florida/TNI Certification #: E87683

Georgia Certification #: C040

Florida: Cert E871149 SEKS WET

Guam Certification

Hawaii Certification

Idaho Certification

Illinois Certification

Indiana Certification

Iowa Certification #: 391

Kansas/TNI Certification #: E-10358

Kentucky Certification #: KY90133

KY WW Permit #: KY0098221

KY WW Permit #: KY0000221

Louisiana DHH/TNI Certification #: LA180012

Louisiana DEQ/TNI Certification #: 4086

Maine Certification #: 2017020

Maryland Certification #: 308

Massachusetts Certification #: M-PA1457

Michigan/PADEP Certification #: 9991

Missouri Certification #: 235

Montana Certification #: Cert0082

Nebraska Certification #: NE-OS-29-14

Nevada Certification #: PA014572018-1

New Hampshire/TNI Certification #: 297617

New Jersey/TNI Certification #: PA051

New Mexico Certification #: PA01457

New York/TNI Certification #: 10888

North Carolina Certification #: 42706

North Dakota Certification #: R-190

Ohio EPA Rad Approval: #41249

Oregon/TNI Certification #: PA200002-010

Pennsylvania/TNI Certification #: 65-00282

Puerto Rico Certification #: PA01457

Rhode Island Certification #: 65-00282

South Dakota Certification

Tennessee Certification #: 02867

Texas/TNI Certification #: T104704188-17-3

Utah/TNI Certification #: PA014572017-9

USDA Soil Permit #: P330-17-00091

Vermont Dept. of Health: ID# VT-0282

Virgin Island/PADEP Certification

Virginia/VELAP Certification #: 9526

Washington Certification #: C868

West Virginia DEP Certification #: 143

West Virginia DHHR Certification #: 9964C

Wisconsin Approve List for Rad

Wyoming Certification #: 8TMS-L

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## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: JEC FAL CCR

Pace Project No.: 60314891

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60314891001	MW-FAA-3	Water	09/12/19 12:58	09/13/19 16:20
60314891002	MW-FAA-4	Water	09/12/19 14:59	09/13/19 16:20
60314891003	MW-FAA-5	Water	09/12/19 16:55	09/13/19 16:20
60314891004	MW-FAA-6	Water	09/12/19 11:05	09/13/19 16:20
60314891005	DUPLICATE	Water	09/12/19 11:05	09/13/19 16:20

## REPORT OF LABORATORY ANALYSIS

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### SAMPLE ANALYTE COUNT

Project: JEC FAL CCR

Pace Project No.: 60314891

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60314891001	MW-FAA-3	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	VAL	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60314891002	MW-FAA-4	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	VAL	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60314891003	MW-FAA-5	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	VAL	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60314891004	MW-FAA-6	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	VAL	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA
60314891005	DUPLICATE	EPA 903.1	MK1	1	PASI-PA
		EPA 904.0	VAL	1	PASI-PA
		Total Radium Calculation	CMC	1	PASI-PA

### REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAL CCR

Pace Project No.: 60314891

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**Method:** EPA 903.1

**Description:** 903.1 Radium 226

**Client:** Evergy Kansas Central, Inc.

**Date:** October 08, 2019

**General Information:**

5 samples were analyzed for EPA 903.1. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAL CCR

Pace Project No.: 60314891

---

**Method:** EPA 904.0

**Description:** 904.0 Radium 228

**Client:** Evergy Kansas Central, Inc.

**Date:** October 08, 2019

**General Information:**

5 samples were analyzed for EPA 904.0. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

## REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: JEC FAL CCR

Pace Project No.: 60314891

---

**Method:** Total Radium Calculation

**Description:** Total Radium 228+226

**Client:** Evergy Kansas Central, Inc.

**Date:** October 08, 2019

**General Information:**

5 samples were analyzed for Total Radium Calculation. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

**Hold Time:**

The samples were analyzed within the method required hold times with any exceptions noted below.

**Method Blank:**

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

**Laboratory Control Spike:**

All laboratory control spike compounds were within QC limits with any exceptions noted below.

**Matrix Spikes:**

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

**Additional Comments:**

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAL CCR

Pace Project No.: 60314891

---

**Sample: MW-FAA-3**      **Lab ID: 60314891001**      Collected: 09/12/19 12:58      Received: 09/13/19 16:20      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.218 ± 0.378 (0.675)</b> C:NA T:75%	pCi/L	10/01/19 11:13	13982-63-3	
Radium-228	EPA 904.0	<b>0.639 ± 0.554 (1.13)</b> C:78% T:67%	pCi/L	10/01/19 14:04	15262-20-1	
Total Radium	Total Radium Calculation	<b>0.857 ± 0.932 (1.81)</b>	pCi/L	10/03/19 11:53	7440-14-4	

## REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAL CCR

Pace Project No.: 60314891

**Sample: MW-FAA-4**      **Lab ID: 60314891002**      Collected: 09/12/19 14:59      Received: 09/13/19 16:20      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.335 ± 0.437 (0.721)</b> C:NA T:83%	pCi/L	10/01/19 11:13	13982-63-3	
Radium-228	EPA 904.0	<b>-0.00384 ± 0.421 (0.972)</b> C:76% T:80%	pCi/L	10/01/19 14:04	15262-20-1	
Total Radium	Total Radium Calculation	<b>0.335 ± 0.858 (1.69)</b>	pCi/L	10/03/19 11:53	7440-14-4	

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAL CCR

Pace Project No.: 60314891

**Sample: MW-FAA-5**      **Lab ID: 60314891003**      Collected: 09/12/19 16:55      Received: 09/13/19 16:20      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.656 ± 0.541 (0.781)</b> C:NA T:92%	pCi/L	10/01/19 11:13	13982-63-3	
Radium-228	EPA 904.0	<b>0.138 ± 0.313 (0.694)</b> C:78% T:85%	pCi/L	10/01/19 14:05	15262-20-1	
Total Radium	Total Radium Calculation	<b>0.794 ± 0.854 (1.48)</b>	pCi/L	10/03/19 11:53	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAL CCR

Pace Project No.: 60314891

**Sample: MW-FAA-6**      **Lab ID: 60314891004**      Collected: 09/12/19 11:05      Received: 09/13/19 16:20      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.136 ± 0.327 (0.632)</b> C:NA T:89%	pCi/L	10/01/19 11:13	13982-63-3	
Radium-228	EPA 904.0	<b>-0.0595 ± 0.423 (0.985)</b> C:77% T:78%	pCi/L	10/01/19 14:04	15262-20-1	
Total Radium	Total Radium Calculation	<b>0.136 ± 0.750 (1.62)</b>	pCi/L	10/03/19 11:53	7440-14-4	

### REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS - RADIOCHEMISTRY

Project: JEC FAL CCR

Pace Project No.: 60314891

---

**Sample: DUPLICATE**      **Lab ID: 60314891005**      Collected: 09/12/19 11:05      Received: 09/13/19 16:20      Matrix: Water  
PWS:      Site ID:      Sample Type:

Parameters	Method	Act ± Unc (MDC) Carr Trac	Units	Analyzed	CAS No.	Qual
Radium-226	EPA 903.1	<b>0.734 ± 0.479 (0.491)</b> C:NA T:87%	pCi/L	10/01/19 11:13	13982-63-3	
Radium-228	EPA 904.0	<b>0.196 ± 0.432 (0.956)</b> C:75% T:75%	pCi/L	10/01/19 14:04	15262-20-1	
Total Radium	Total Radium Calculation	<b>0.930 ± 0.911 (1.45)</b>	pCi/L	10/03/19 11:53	7440-14-4	

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL - RADIOCHEMISTRY

Project: JEC FAL CCR

Pace Project No.: 60314891

QC Batch: 362051

Analysis Method: EPA 904.0

QC Batch Method: EPA 904.0

Analysis Description: 904.0 Radium 228

Associated Lab Samples: 60314891001, 60314891002, 60314891003, 60314891004, 60314891005

METHOD BLANK: 1756639

Matrix: Water

Associated Lab Samples: 60314891001, 60314891002, 60314891003, 60314891004, 60314891005

Parameter	Act ± Unc (MDC) Carr Trac	Units	Analyzed	Qualifiers
Radium-228	0.307 ± 0.370 (0.779) C:77% T:74%	pCi/L	10/01/19 14:05	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL - RADIOCHEMISTRY

Project: JEC FAL CCR

Pace Project No.: 60314891

QC Batch: 362052

Analysis Method: EPA 903.1

QC Batch Method: EPA 903.1

Analysis Description: 903.1 Radium-226

Associated Lab Samples: 60314891001, 60314891002, 60314891003, 60314891004, 60314891005

METHOD BLANK: 1756645

Matrix: Water

Associated Lab Samples: 60314891001, 60314891002, 60314891003, 60314891004, 60314891005

Parameter	Act ± Unc (MDC) Carr Trac	Units	Analyzed	Qualifiers
Radium-226	0.277 ± 0.393 (0.665) C:NA T:81%	pCi/L	10/01/19 10:59	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

### REPORT OF LABORATORY ANALYSIS

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## QUALIFIERS

Project: JEC FAL CCR

Pace Project No.: 60314891

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### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Act - Activity

Unc - Uncertainty: SDWA = 1.96 sigma count uncertainty, all other matrices = Expanded Uncertainty (95% confidence interval).

Gamma Spec = Expanded Uncertainty (95.4% Confidence Interval)

(MDC) - Minimum Detectable Concentration

Trac - Tracer Recovery (%)

Carr - Carrier Recovery (%)

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### LABORATORIES

PASI-PA Pace Analytical Services - Greensburg

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC FAL CCR

Pace Project No.: 60314891

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60314891001	MW-FAA-3	EPA 903.1	362052		
60314891002	MW-FAA-4	EPA 903.1	362052		
60314891003	MW-FAA-5	EPA 903.1	362052		
60314891004	MW-FAA-6	EPA 903.1	362052		
60314891005	DUPLICATE	EPA 903.1	362052		
60314891001	MW-FAA-3	EPA 904.0	362051		
60314891002	MW-FAA-4	EPA 904.0	362051		
60314891003	MW-FAA-5	EPA 904.0	362051		
60314891004	MW-FAA-6	EPA 904.0	362051		
60314891005	DUPLICATE	EPA 904.0	362051		
60314891001	MW-FAA-3	Total Radium Calculation	364467		
60314891002	MW-FAA-4	Total Radium Calculation	364467		
60314891003	MW-FAA-5	Total Radium Calculation	364467		
60314891004	MW-FAA-6	Total Radium Calculation	364467		
60314891005	DUPLICATE	Total Radium Calculation	364467		

### REPORT OF LABORATORY ANALYSIS

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**Sample Condition Upon Receipt**

**WO# : 60314891**  
  
**60314891**

Client Name: Westar Energy

Courier: FedEx  UPS  VIA  Clay  PEX  ECI  Pace  Xroads  Client  Other

Tracking #: \_\_\_\_\_ Pace Shipping Label Used? Yes  No

Custody Seal on Cooler/Box Present: Yes  No  Seals intact: Yes  No

Packing Material: Bubble Wrap  Bubble Bags  Foam  None  Other

Thermometer Used: T-300 Type of Ice: Wet Blue  None

Cooler Temperature (°C): As-read 1.8 Corr. Factor 0.0 Corrected 1.8

Date and initials of person examining contents:  
pv9/13/19

Temperature should be above freezing to 6°C

Chain of Custody present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Chain of Custody relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples arrived within holding time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Short Hold Time analyses (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Rush Turn Around Time requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Sufficient volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Correct containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Pace containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Filtered volume received for dissolved tests?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Sample labels match COC: Date / time / ID / analyses	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples contain multiple phases? Matrix: <u>WT</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Containers requiring pH preservation in compliance? (HNO <sub>3</sub> , H <sub>2</sub> SO <sub>4</sub> , HCl<2; NaOH>9 Sulfide, NaOH>10 Cyanide) (Exceptions: VOA, Micro, O&G, KS TPH, OK-DRO)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	List sample IDs, volumes, lot #'s of preservative and the date/time added.
Cyanide water sample checks:		
Lead acetate strip turns dark? (Record only)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Potassium iodide test strip turns blue/purple? (Preserve)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Trip Blank present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Headspace in VOA vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Samples from USDA Regulated Area: State:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Additional labels attached to 5035A / TX1005 vials in the field?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

Client Notification/ Resolution: Copy COC to Client? Y / N Field Data Required? Y / N

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_

Comments/ Resolution: \_\_\_\_\_

Project Manager Review: \_\_\_\_\_ Date: \_\_\_\_\_




# Chain of Custody



Samples were sent directly to the Subcontracting Laboratory.

State Of Origin: KS  
 Cert. Needed:  Yes  No

Workorder: 60314891      Workorder Name: JEC FAL CCR      Owner Received Date: 9/13/2019      Results Requested By: 10/7/2019

Report To		Subcontract To		Requested Analysis															
Heather Wilson Pace Analytical Kansas 9608 Loiret Blvd. Lenexa, KS 66219 Phone 1(913)563-1407				Pace Analytical Pittsburgh 1638 Roseytown Road Suites 2,3, & 4 Greensburg, PA 15601 Phone (724)850-5600				<div style="font-size: 2em; font-weight: bold;">WO#: 30325075</div>  <div style="font-weight: bold;">30325075</div>											
						Preserved Containers						Radium-226 & Total Sum		Radium-228					

Item	Sample ID	Sample Type	Collect Date/Time	Lab ID	Matrix	HNO3															LAB USE ONLY
1	MW-FAA-3	PS	9/12/2019 12:58	60314891001	Water	2							X	X							001
2	MW-FAA-4	PS	9/12/2019 14:59	60314891002	Water	2							X	X							002
3	MW-FAA-5	PS	9/12/2019 16:55	60314891003	Water	2							X	X							003
4	MW-FAA-6	PS	9/12/2019 11:05	60314891004	Water	2							X	X							004
5	DUPLICATE	PS	9/12/2019 11:05	60314891005	Water	2							X	X							005

Transfers						Comments											
Released By	Date/Time	Received By	Date/Time	*Please provide QC sheets													
E. Brocheta / Pace	9/16/19 1800	<i>[Signature]</i>	9-17-19 9:15														
Cooler Temperature on Receipt <u>N/A</u> °C		Custody Seal Y or <u>N</u>		Received on Ice Y or <u>N</u>		Samples Intact <u>Y</u> or <u>N</u>											

\*\*\*In order to maintain client confidentiality, location/name of the sampling site, sampler's name and signature may not be provided on this COC document.  
 This chain of custody is considered complete as is since this information is available in the owner laboratory.

Pittsburgh Lab Sample Condition Upon Receipt



Client Name: Pace/US

Project # # 30325075

Courier:  Fed Ex  UPS  USPS  Client  Commercial  Pace Other

Tracking #: 1219 2978 4079

Label DJL  
LIMS Login DJL

Custody Seal on Cooler/Box Present:  yes  no Seals intact:  yes  no

Thermometer Used N/A Type of Ice: Wet Blue None

Cooler Temperature Observed Temp \_\_\_\_\_ °C Correction Factor: \_\_\_\_\_ °C Final Temp: \_\_\_\_\_ °C  
Temp should be above freezing to 6°C

Comments:	pH paper Lot#			Date and Initials of person examining contents:
	Yes	No	N/A	
Chain of Custody Present:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. <u>1004281</u>
Chain of Custody Filled Out:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4.
Sample Labels match COC: -Includes date/time/ID Matrix: <u>WT</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.
Short Hold Time Analysis (<72hr remaining):	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7.
Rush Turn Around Time Requested:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8.
Sufficient Volume:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9.
Correct Containers Used: -Pace Containers Used:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10.
Containers intact:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	11.
Orthophosphate field filtered	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12.
Hex Cr Aqueous sample field filtered	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13.
Organic Samples checked for dechlorination:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	14.
Filtered volume received for Dissolved tests	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15.
All containers have been checked for preservation. exceptions: VOA, coliform, TOC, O&G, Phenolics, Radon, Non-aqueous matrix	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	16. <u>PM 12</u>
All containers meet method preservation requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Initial when completed <u>DJL</u> Date/time of preservation
Headspace in VOA Vials (>6mm):	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Lot # of added preservative
Trip Blank Present:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	17.
Trip Blank Custody Seals Present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18.
Rad Samples Screened < 0.5 mrem/hr	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Initial when completed <u>DJL</u> Date: <u>9-17-19</u>

Client Notification/ Resolution:

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_ Contacted By: \_\_\_\_\_

Comments/ Resolution: \_\_\_\_\_

A check in this box indicates that additional information has been stored in ereports.

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e. out of hold, incorrect preservative, out of temp, incorrect containers)  
\*PM review is documented electronically in LIMS. When the Project Manager closes the SRF Review schedule in LIMS. The review is in the Status section of the Workorder Edit Screen.



## Quality Control Sample Performance Assessment

Test: Ra-226  
Analyst: MK1  
Date:  
Batch ID: 49912  
Matrix: DW

Analyst Must Manually Enter All Fields Highlighted in Yellow.

Method Blank Assessment	
MB Sample ID	1756645
MB concentration:	0.277
M/B Counting Uncertainty:	0.391
MB MDC:	0.665
MB Numerical Performance Indicator:	1.39
MB Status vs Numerical Indicator:	N/A
MB Status vs. MDC:	Pass

Laboratory Control Sample Assessment	LCSD (Y or N)?	N
	LCSD49912	LCSD49912
Count Date:	10/1/2019	
Spike I.D.:	19-022	
Spike Concentration (pCi/mL):	32.118	
Volume Used (mL):	0.10	
Aliquot Volume (L, g, F):	0.661	
Target Conc. (pCi/L, g, F):	4.857	
Uncertainty (Calculated):	0.228	
Result (pCi/L, g, F):	5.371	
LCSD/LCSD Counting Uncertainty (pCi/L, g, F):	1.009	
Numerical Performance Indicator:	0.97	
Percent Recovery:	110.58%	
Status vs Numerical Indicator:	N/A	
Status vs Recovery:	Pass	
Upper % Recovery Limits:	135%	
Lower % Recovery Limits:	73%	

Sample Matrix Spike Control Assessment	MS/MSD 1	MS/MSD 2
Sample Collection Date:	9/11/2019	
Sample I.D.:	35497727003	
Sample MS I.D.:	35497727003MS	
Sample MSD I.D.:		
Spike I.D.:	19-022	
MS/MSD Decay Corrected Spike Concentration (pCi/mL):	32.119	
Spike Volume Used in MS (mL):	0.20	
Spike Volume Used in MSD (mL):		
MS Aliquot (L, g, F):	0.654	
MS Target Conc.(pCi/L, g, F):	9.820	
MSD Aliquot (L, g, F):		
MSD Target Conc. (pCi/L, g, F):		
MS Spike Uncertainty (calculated):	0.462	
MSD Spike Uncertainty (calculated):		
Sample Result:	0.207	
Sample Result Counting Uncertainty (pCi/L, g, F):	0.248	
Sample Matrix Spike Result:	9.909	
Matrix Spike Result Counting Uncertainty (pCi/L, g, F):	1.464	
Sample Matrix Spike Duplicate Result:		
Matrix Spike Duplicate Result Counting Uncertainty (pCi/L, g, F):		
MS Numerical Performance Indicator:	-0.148	
MSD Numerical Performance Indicator:		
MS Percent Recovery:	98.81%	
MSD Percent Recovery:		
MS Status vs Numerical Indicator:	N/A	
MSD Status vs Numerical Indicator:		
MS Status vs Recovery:	Pass	
MSD Status vs Recovery:		
MS/MSD Upper % Recovery Limits:	136%	
MS/MSD Lower % Recovery Limits:	71%	

Duplicate Sample Assessment		Enter Duplicate sample IDs if other than LCS/LCSD in the space below.
Sample I.D.:	35497727002	
Duplicate Sample I.D.:	35497727002DUP	
Sample Result (pCi/L, g, F):	0.438	
Sample Result Counting Uncertainty (pCi/L, g, F):	0.442	
Sample Duplicate Result (pCi/L, g, F):	0.857	
Sample Duplicate Result Counting Uncertainty (pCi/L, g, F):	0.533	
Are sample and/or duplicate results below RL?	See Below ##	
Duplicate Numerical Performance Indicator:	-1.187	
Duplicate RPD:	64.78%	
Duplicate Status vs Numerical Indicator:	N/A	
Duplicate Status vs RPD:	Fail	
% RPD Limit:	32%	

Matrix Spike/Matrix Spike Duplicate Sample Assessment		
Sample I.D.:		
Sample MS I.D.:		
Sample MSD I.D.:		
Sample Matrix Spike Result:		
Matrix Spike Result Counting Uncertainty (pCi/L, g, F):		
Sample Matrix Spike Duplicate Result:		
Matrix Spike Duplicate Result Counting Uncertainty (pCi/L, g, F):		
Duplicate Numerical Performance Indicator:		
(Based on the Percent Recoveries) MS/ MSD Duplicate RPD:		
MS/ MSD Duplicate Status vs Numerical Indicator:		
MS/ MSD Duplicate Status vs RPD:		
% RPD Limit:		

## Evaluation of duplicate precision is not applicable if either the sample or duplicate results are below the RL.

Comments:

~~Batch must be re-prepped due to unacceptable precision.~~

*OK 10/1/19*

*OK 10/1/19*

*10-1-19*





## Quality Control Sample Performance Assessment

**Analyst Must Manually Enter All Fields Highlighted in Yellow.**

Test: Ra-228  
Analyst: VAL  
Date: 9/25/2019  
Worklist: 49911  
Matrix: WT

Method Blank Assessment	
MB Sample ID	1756639
MB concentration:	0.307
M/B 2 Sigma CSU:	0.370
MB MDC:	0.779
MB Numerical Performance Indicator:	1.63
MB Status vs Numerical Indicator:	Pass
MB Status vs. MDC:	Pass

Laboratory Control Sample Assessment	LCSD (Y or N)?	
	LCS49911	LCSD49911
Count Date:	10/1/2019	
Spike I.D.:	19-026	
Decay Corrected Spike Concentration (pCi/mL):	35.224	
Volume Used (mL):	0.10	
Aliquot Volume (L, g, F):	0.808	
Target Conc. (pCi/L, g, F):	4.361	
Uncertainty (Calculated):	0.214	
Result (pCi/L, g, F):	2.866	
LCS/LCSD 2 Sigma CSU (pCi/L, g, F):	0.800	
Numerical Performance Indicator:	-3.54	
Percent Recovery:	65.72%	
Status vs Numerical Indicator:	N/A	
Status vs Recovery:	Pass	
Upper % Recovery Limits:	135%	
Lower % Recovery Limits:	60%	

Sample Matrix Spike Control Assessment	MS/MSD 1	MS/MSD 2
Sample Collection Date:	9/17/2019	
Sample I.D.:	30325118001	
Sample MS I.D.:	30325118001MS	
Sample MSD I.D.:		
Spike I.D.:	19-026	
MS/MSD Decay Corrected Spike Concentration (pCi/mL):	35.389	
Spike Volume Used in MS (mL):	0.20	
Spike Volume Used in MSD (mL):		
MS Aliquot (L, g, F):	0.821	
MS Target Conc. (pCi/L, g, F):	8.617	
MSD Aliquot (L, g, F):		
MSD Target Conc. (pCi/L, g, F):		
MS Spike Uncertainty (calculated):	0.422	
MSD Spike Uncertainty (calculated):		
Sample Result:	2.860	
Sample Result 2 Sigma CSU (pCi/L, g, F):	0.830	
Sample Matrix Spike Result:	10.089	
Matrix Spike Result 2 Sigma CSU (pCi/L, g, F):	2.024	
Sample Matrix Spike Duplicate Result:		
Matrix Spike Duplicate Result 2 Sigma CSU (pCi/L, g, F):		
MS Numerical Performance Indicator:	-1.221	
MSD Numerical Performance Indicator:		
MS Percent Recovery:	83.90%	
MSD Percent Recovery:		
MS Status vs Numerical Indicator:	Pass	
MSD Status vs Numerical Indicator:		
MS Status vs Recovery:	Pass	
MSD Status vs Recovery:		
MS/MSD Upper % Recovery Limits:	135%	
MS/MSD Lower % Recovery Limits:	60%	

Duplicate Sample Assessment		Enter Duplicate sample IDs if other than LCS/LCSD in the space below.
Sample I.D.:	30325065002	
Duplicate Sample I.D.:	30325065002DUP	
Sample Result (pCi/L, g, F):	0.572	
Sample Result 2 Sigma CSU (pCi/L, g, F):	0.415	
Sample Duplicate Result (pCi/L, g, F):	0.616	
Sample Duplicate Result 2 Sigma CSU (pCi/L, g, F):	0.377	
Are sample and/or duplicate results below RL?	See Below ##	
Duplicate Numerical Performance Indicator:	-0.153	
Duplicate RPD:	7.38%	
Duplicate Status vs Numerical Indicator:	Pass	
Duplicate Status vs RPD:	Pass	
% RPD Limit:	36%	

Matrix Spike/Matrix Spike Duplicate Sample Assessment	
Sample I.D.:	
Sample MS I.D.:	
Sample MSD I.D.:	
Sample Matrix Spike Result:	
Matrix Spike Result 2 Sigma CSU (pCi/L, g, F):	
Sample Matrix Spike Duplicate Result:	
Matrix Spike Duplicate Result 2 Sigma CSU (pCi/L, g, F):	
Duplicate Numerical Performance Indicator:	
(Based on the Percent Recoveries) MS/MSD Duplicate RPD:	
MS/MSD Duplicate Status vs Numerical Indicator:	
MS/MSD Duplicate Status vs RPD:	
% RPD Limit:	

## Evaluation of duplicate precision is not applicable if either the sample or duplicate results are below the MDC.

Comments:

JJ  
10-3-19

**ATTACHMENT 2**  
**Statistical Analyses**

**ATTACHMENT 2-1**  
**September 2018 Statistical Analyses**



HALEY & ALDRICH, INC.  
6500 Rockside Road  
Suite 200  
Cleveland, OH 44131  
216.739.0555

## TECHNICAL MEMORANDUM

November 4, 2022  
File No. 129778

TO: Evergy Kansas Central, Inc.  
Jared Morrison – Director, Water and Waste Programs

FROM: Haley & Aldrich, Inc.  
Steven F. Putrich, P.E., Senior Associate – Engineering Principal  
Mark Nicholls, P.G., Senior Associate – Senior Hydrogeologist

SUBJECT: September 2018 Semi-Annual Groundwater Assessment Monitoring Data  
Statistical Evaluation  
**Completed January 14, 2019**  
Jeffrey Energy Center  
Fly Ash Landfill

Pursuant to Title 40 Code of Federal Regulations (40 CFR) §§ 257.93 and 257.95 (Rule), this memorandum summarizes the statistical evaluation of the analytical results for the **September 2018** semi-annual assessment monitoring groundwater sampling event for the Jeffrey Energy Center (JEC) Fly Ash Landfill (FAL). This semi-annual assessment monitoring groundwater sampling event was completed on **September 13, 2018**. All laboratory results were received and accepted on **October 15, 2018**.

The statistical evaluation discussed in this memorandum was conducted to determine if Appendix IV groundwater monitoring constituents have been detected in downgradient wells at concentrations that represent a statistically significant increase (SSI) above background values and if one or more of the constituents have been detected at statistically significant level (SSL) above the groundwater protection standard (GWPS) consistent with the requirements of the Rule. GWPSs for each of the Appendix IV constituents have been set equal to the highest value of the maximum contaminant level (MCL), regional screening level (RSL), or background concentration.

### Statistical Evaluation of Appendix IV Constituents

The Rule provides four specific options for statistical evaluation of groundwater quality data collected at a coal combustion residual (CCR) unit (40 CFR § 257.93(f)(1-4)). The statistical method used for these evaluations (tolerance limit [TL]) was certified by Haley & Aldrich, Inc. on January 14, 2019. The TL method, as determined applicable for this sampling event, was used to evaluate potential SSLs above background. Background levels for each constituent listed in Appendix IV were computed as upper tolerance limits (UTLs), and a minimum 95 percent confidence coefficient and 95 percent coverage. The

most recent groundwater sampling event from each compliance well was compared to the corresponding background UTL to determine if an SSL existed.

## STATISTICAL ANALYSIS

An interwell evaluation was used to determine the SSIs. Interwell evaluation compares the most recent values from downgradient compliance wells against a background dataset composed of upgradient well data. Because the CCR unit has transitioned into assessment monitoring, no statistical evaluations were conducted on Appendix III (detection monitoring) semi-annual assessment monitoring data.

The TL method was used to complete statistical evaluations of the referenced dataset. The TL procedure is one in which a concentration limit for each constituent is established from the distribution of the background data, with a minimum 95 percent confidence level. The upper endpoint of a tolerance interval is called the UTL. Depending on the data distribution, parametric or non-parametric TL procedures are used to evaluate groundwater monitoring data using this method. Parametric TLs utilize normally distributed data or normalized data via a transformation of the sample background data used to construct the limit. If the data are non-normal and a transformation is not indicated, non-parametric procedures (order statistics or bootstrap methods) are used to calculate the TL. If all the background data are non-detect, a maximum reporting limit may serve as an appropriate UTL.

These statistical evaluations were conducted using a background dataset for all Appendix IV constituents that were detected in the annual assessment monitoring sample event using parametric TLs. If an Appendix IV constituent concentration from the **September 2018** sampling event was above the GWPS, the lower confidence limit (LCL) for the downgradient well constituent will be used to evaluate if a SSI is present. The LCL is the lower end of the confidence interval range, which is an estimated concentration range intended to contain the true mean or median of the population from which the sample is drawn. The confidence interval range is designed to locate the true population mean or median with a high degree of statistical confidence, or conversely, with a low probability of error.

The UTLs were calculated from the background well dataset using Chemstat software after testing for outlier sample results that would warrant removal from the dataset based on likely error in sampling or measurement. Both visual and statistical outlier tests for the background data were performed using Chemstat and U.S. Environmental Protection Agency's ProUCL 5.1 software, and a visual inspection of the data was performed using box plots and distribution plots for the downgradient sample data. No sample data were identified as outliers that warranted removal from the dataset.

## BACKGROUND DISTRIBUTIONS

The groundwater analytical results for each sampling event from the background sample location MW-FAA-5 were combined to calculate the UTL for each detected Appendix IV constituent. The variability and distribution of the pooled dataset were evaluated to determine the method for UTL calculation. Per the document, *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance*, March 2009, background concentrations were updated based on statistical evaluation of analytical results collected through **September 2018**.

## RESULTS OF APPENDIX IV DOWNGRADIENT STATISTICAL COMPARISONS

Sample concentrations from the downgradient wells for each of the detected Appendix IV constituents from the **September 2018** semi-annual assessment monitoring event were compared to their respective background UTLs and GWPSs (Table I). A sample concentration greater than the background UTL is considered to represent an SSI. A sample concentration greater than the GWPS is considered to represent a SSL. The results of the groundwater assessment monitoring statistical evaluation are provided in Table I. **Based on this statistical evaluation of groundwater sampling data collected in September 2018, a SSL above the GWPS occurred at the JEC FAL for molybdenum at MW-FAA-6.**

Enclosures:

Table I – Summary of Semi-Annual Assessment Groundwater Monitoring Statistical Evaluation



## **TABLES**

**TABLE I**  
**SUMMARY OF SEMI-ANNUAL ASSESSMENT GROUNDWATER MONITORING STATISTICAL EVALUATION**  
 SEPTEMBER 2018 SAMPLING EVENT  
 JEFFREY ENERGY CENTER FLY ASH LANDFILL  
 ST. MARYS, KANSAS

Location Id	Frequency of Detection	Percent Non-Detects	Range of Non-Detect	Maximum Detect	Variance	Standard Deviation	Coefficient of Variance	CCR MCL/RSL	Report Result Unit	Detection Exceedances (Y/N)	MCL Comparison		Outlier Presence	Outlier Removed	Trend	Distribution Well	September 2018 Concentration (mg/L)	Interwell Analysis		Groundwater Protection Standard	
											Number of Detection Exceedances	Number of Non-Detection Exceedances						Background Limits <sup>1</sup> (UTL) mg/L	SSI	GWPS (Higher of MCL/RSL or UTL) (mg/L)	SSL
<b>CCR Appendix-IV: Arsenic, Total (µg/L)</b>																					
MW-FAA-5 (Upgradient)	9/10	10%	1-1	3.5	1.098	1.048	0.6157	0.010	mg/L	N	0	0	No	No	Stable	Normal	0.00071	0.00372		0.010	
MW-FAA-3	3/10	70%	1-1	1.1	0.002054	0.04533	0.04537	0.010	mg/L	N	0	0	Yes	No	NA	Non-parametric	0.00091		No		No
MW-FAA-4	0/10	100%	0.5-1	-	0.025	0.1581	0.1664	0.010	mg/L	N	0	0	NA	NA	NA	NA	<0.0005		No		No
MW-FAA-6	10/10	0%	-	8.6	1.732	1.316	0.214	0.010	mg/L	N	0	0	No	No	Stable	Non-parametric	0.0085		Yes		No
<b>CCR Appendix-IV: Barium, Total (µg/L)</b>																					
MW-FAA-5 (Upgradient)	3/10	70%	5-10	13	9.563	3.092	0.4048	2	mg/L	N	0	0	No	No	NA	Normal	<0.0050	0.0136		2	
MW-FAA-3	10/10	0%	-	47	37.83	6.151	0.1836	2	mg/L	N	0	0	No	No	Decreasing	Normal	0.027		Yes		No
MW-FAA-4	10/10	0%	-	53	4.678	2.163	0.043	2	mg/L	N	0	0	No	No	Stable	Normal	0.053		Yes		No
MW-FAA-6	10/10	0%	-	67	185.8	13.63	0.233	2	mg/L	N	0	0	No	No	Stable	Non-parametric	0.032		Yes		No
<b>CCR Appendix-IV: Cobalt, Total (µg/L)</b>																					
MW-FAA-5 (Upgradient)	6/10	40%	1-1	3.6	1.02	1.01	0.6742	0.006	mg/L	N	0	0	No	No	Stable	Non-parametric	0.0013	0.0036		0.006	
MW-FAA-3	2/10	80%	1-1	0.58	0.0362	0.1903	0.2091	0.006	mg/L	N	0	0	No	No	NA	Non-parametric	0.00058		No		No
MW-FAA-4	0/10	100%	0.5-1	-	0.025	0.1581	0.1664	0.006	mg/L	N	0	0	NA	NA	NA	NA	<0.0005		No		No
MW-FAA-6	9/10	10%	1-1	1.8	0.06354	0.2521	0.2059	0.006	mg/L	N	0	0	No	No	Stable	Normal	0.00094		No		No
<b>CCR Appendix-IV: Fluoride, Total (µg/L)</b>																					
MW-FAA-5 (Upgradient)	11/11	0%	-	1300	51590	227.1	0.2734	4.0	mg/L	N	0	0	No	No	Stable	Normal	1.3	1.261		4.0	
MW-FAA-3	11/11	0%	-	400	1296	36.01	0.1097	4.0	mg/L	N	0	0	No	No	Increasing	Normal	0.40		No		No
MW-FAA-4	11/11	0%	-	400	1316	36.28	0.1061	4.0	mg/L	N	0	0	No	No	Increasing	Normal	0.40		No		No
MW-FAA-6	12/12	0%	-	1100	21730	147.4	0.1798	4.0	mg/L	N	0	0	No	No	Stable	Normal	1.1		No		No
<b>CCR Appendix-IV: Lithium, Total (µg/L)</b>																					
MW-FAA-5 (Upgradient)	10/10	0%	-	160	1145	33.84	0.288	0.040	mg/L	Y	10	0	No	No	Stable	Normal	0.11	0.183		0.183	
MW-FAA-3	9/10	10%	20-20	19	7.211	2.685	0.1668	0.040	mg/L	N	0	0	No	No	Stable	Normal	0.014		No		No
MW-FAA-4	8/10	20%	10-20	18	8.4	2.898	0.1907	0.040	mg/L	N	0	0	No	No	Stable	Normal	0.018		No		No
MW-FAA-6	7/10	30%	10-20	16	10.27	3.204	0.2584	0.040	mg/L	N	0	0	No	No	Stable	Non-parametric	<0.010		No		No
<b>CCR Appendix-IV: Molybdenum, Total (µg/L)</b>																					
MW-FAA-5 (Upgradient)	10/10	0%	-	67	360.6	18.99	0.5686	0.100	mg/L	N	0	0	No	No	Stable	Normal	0.0267	0.0699		0.100	
MW-FAA-3	10/10	0%	-	14	5.14	2.267	0.2143	0.100	mg/L	N	0	0	No	No	Stable	Normal	0.0064		No		No
MW-FAA-4	10/10	0%	-	3.7	0.201	0.4483	0.1499	0.100	mg/L	N	0	0	No	No	Stable	Normal	0.0037		No		No
MW-FAA-6	10/10	0%	-	590	10350	101.8	0.2095	0.100	mg/L	Y	10	0	No	No	Stable	Normal	0.416		Yes		Yes
<b>CCR Appendix-IV: Radium-226 &amp; 228, Total (pCi/L)</b>																					
MW-FAA-5 (Upgradient)	10/10	0%	-	1.22	0.1209	0.3477	0.5473	5	mg/L	N	0	0	No	No	Stable	Normal	0.617	1.3		5	
MW-FAA-3	10/10	0%	-	1.22	0.2349	0.4847	1.062	5	mg/L	N	0	0	No	No	Stable	Normal	0.653		No		No
MW-FAA-4	10/10	0%	-	0.644	0.04153	0.2038	0.5926	5	mg/L	N	0	0	No	No	Stable	Normal	1.030		No		No
MW-FAA-6	10/10	0%	-	0.71	0.1491	0.3861	2.657	5	mg/L	N	0	0	No	No	Stable	Normal	0.720		No		No
<b>CCR Appendix-IV: Selenium, Total (µg/L)</b>																					
MW-FAA-5 (Upgradient)	4/10	60%	0.5-1	3.9	1.162	1.078	0.6653	0.05	mg/L	N	0	0	No	No	NA	Normal	<0.00050	0.00369		0.05	
MW-FAA-3	0/10	100%	0.5-1	-	0.025	0.1581	0.1664	0.05	mg/L	N	0	0	NA	NA	NA	NA	<0.00050		No		No
MW-FAA-4	2/10	80%	1-1	1.2	0.007111	0.08433	0.08108	0.05	mg/L	N	0	0	No	No	NA	Non-parametric	0.0012		No		No
MW-FAA-6	1/10	90%	0.5-1	1.1	0.02711	0.1647	0.1715	0.05	mg/L	N	0	0	Yes	No	NA	Non-parametric	<0.00050		No		No

**Notes and Abbreviations:**

<sup>1</sup> Based on background data collected from 08/19/2016 through 09/13/2018

µg/L = micrograms per liter

CCR = coal combustion residuals

GWPS = Groundwater Protection Standard

MCL = maximum contaminant level

mg/L = milligrams per Liter

NA = not analyzed

pCi/L = picoCuries per Liter

RSL = regional screening level

SSI = statistically significant increase

SSL = statistically significant level

UTL = upper tolerance limits

**ATTACHMENT 2-2**  
**March 2019 Statistical Analyses**



HALEY & ALDRICH, INC.  
6500 Rockside Road  
Suite 200  
Cleveland, OH 44131  
216.739.0555

## TECHNICAL MEMORANDUM

November 4, 2022  
File No. 129778-050

TO: Evergy Kansas Central, Inc.  
Jared Morrison – Director, Water and Waste Programs

FROM: Haley & Aldrich, Inc.  
Steven F. Putrich, P.E., Principal Consultant – Engineering Principal  
Mark Nicholls, P.G., Senior Associate – Senior Hydrogeologist

SUBJECT: March 2019 Semi-Annual Groundwater Assessment Monitoring Data  
Statistical Evaluation  
**Completed July 15, 2019**  
Jeffrey Energy Center  
Fly Ash Landfill

Pursuant to Title 40 Code of Federal Regulations (40 CFR) §§ 257.93 and 257.95 (Rule), this memorandum summarizes the statistical evaluation of the analytical results for the **March 2019** semi-annual assessment monitoring groundwater sampling event for the Jeffrey Energy Center (JEC) Fly Ash Landfill (FAL). This semi-annual assessment monitoring groundwater sampling event was completed on **March 26, 2019**. All laboratory results were received and validated on **April 15, 2019**.

The statistical evaluation discussed in this memorandum was conducted to determine if Appendix IV groundwater monitoring constituents have been detected in downgradient wells at concentrations that represent a statistically significant increase (SSI) above background values and if one or more of the constituents have been detected at statistically significant level (SSL) above the groundwater protection standard (GWPS) consistent with the requirements of the Rule. GWPSs for each of the Appendix IV constituents have been set equal to the highest value of the maximum contaminant level (MCL), regional screening level (RSL), or background concentration.

### Statistical Evaluation of Appendix IV Constituents

The Rule provides four specific options for statistical evaluation of groundwater quality data collected at a coal combustion residual (CCR) unit (40 CFR § 257.93(f)(1-4)). The statistical method used for these evaluations (tolerance limit [TL]) was certified by Haley & Aldrich, Inc. on January 14, 2019. The TL method, as determined applicable for this sampling event, was used to evaluate potential SSLs above background. Background levels for each constituent listed in Appendix IV were computed as upper tolerance limits (UTLs), and a minimum 95 percent confidence coefficient and 95 percent coverage. The most recent groundwater sampling event from each compliance well was compared to the corresponding background UTL to determine if a SSL existed.

## STATISTICAL ANALYSIS

Either an interwell or intrawell evaluation was used to determine SSIs. Interwell evaluation compares the most recent values from downgradient compliance wells against a background dataset composed of upgradient well data, and the intrawell evaluation compares the most recent values from each compliance well against a background dataset composed of its own historical data. Because the CCR unit has transitioned into assessment monitoring, no statistical evaluations were conducted on Appendix III (detection monitoring) semi-annual assessment monitoring data.

The TL method was used to complete statistical evaluations of the referenced dataset. The TL procedure is one in which a concentration limit for each constituent is established from the distribution of the background data, with a minimum 95 percent confidence level. The upper endpoint of a tolerance interval is called the UTL. Depending on the data distribution, parametric or non-parametric TL procedures are used to evaluate groundwater monitoring data using this method. Parametric TLs utilize normally distributed data or normalized data via a transformation of the sample background data used to construct the limit. If the data are non-normal and a transformation is not indicated, non-parametric procedures (order statistics or bootstrap methods) are used to calculate the TL. If all the background data are non-detect, a maximum reporting limit may serve as an appropriate UTL.

These statistical evaluations were conducted using a background dataset for all Appendix IV constituents that were detected in the annual assessment monitoring sample event using parametric TLs. If an Appendix IV constituent concentration from the **March 2019** sampling event was above the GWPS, the lower confidence limit (LCL) for the downgradient well constituent will be used to evaluate if a SSI is present. The LCL is the lower end of the confidence interval range, which is an estimated concentration range intended to contain the true mean or median of the population from which the sample is drawn. The confidence interval range is designed to locate the true population mean or median with a high degree of statistical confidence, or conversely, with a low probability of error.

The UTLs were calculated from the background well dataset using Chemstat software after testing for outlier sample results that would warrant removal from the dataset based on likely error in sampling or measurement. Both visual and statistical outlier tests for the background data were performed using Chemstat and U.S. Environmental Protection Agency's ProUCL 5.1 software, and a visual inspection of the data was performed using box plots and distribution plots for the downgradient sample data. No sample data were identified as outliers that warranted removal from the dataset.

## BACKGROUND DISTRIBUTIONS

The groundwater analytical results for each sampling event from the background sample location MW-FAA-5 (for interwell evaluation) were combined to calculate the UTL for each detected Appendix IV constituent. The variability and distribution of the pooled dataset were evaluated to determine the method for UTL calculation. Per the document, *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance*, March 2009, background concentrations were updated based on statistical evaluation of analytical results collected through **September 2018** for **interwell evaluation**. Background concentrations were updated through **August 2017** for **intrawell evaluation**.

## RESULTS OF APPENDIX IV DOWNGRADIENT STATISTICAL COMPARISONS

Sample concentrations from the downgradient wells for each of the detected Appendix IV constituents from the **March 2019** semi-annual assessment monitoring event were compared to their respective background UTLs and GWPSs (Table I). A sample concentration greater than the background UTL is considered to represent a SSI. A sample concentration greater than the GWPS is considered to represent a SSL. Based on previous compliance sampling events, statistical evaluations, and associated alternative source demonstrations, an intrawell comparison is utilized for FAA-6 for molybdenum statistical evaluations. Interwell comparisons are being utilized for all other well and constituent evaluations. The results of the groundwater assessment monitoring statistical evaluation are provided in Table I. **Based on this statistical evaluation of groundwater sampling data collected in March 2019, no SSLs above GWPS occurred at the JEC FAL.**

### Attachments:

Table I – Summary of Semi-Annual Assessment Groundwater Monitoring Statistical Evaluation



## TABLE

**TABLE I**  
**SUMMARY OF SEMI-ANNUAL ASSESSMENT GROUNDWATER MONITORING STATISTICAL EVALUATION**  
MARCH 2019 SAMPLING EVENT  
JEFFREY ENERGY CENTER FLY ASH LANDFILL  
ST. MARYS, KANSAS

Location Id	Frequency of Detection	Percent Non-Detects	Range of Non-Detect	Maximum Detect	Variance	Standard Deviation	Coefficient of Variance	CCR MCL/RSL	Report Result Unit	Detection Exceedances (Y/N)	MCL Comparison		Outlier Presence	Outlier Removed	Trend	Distribution Well	March 2019 Concentration (mg/L)	Interwell Analysis		Intrawell Analysis		Groundwater Protection Standard		
											Number of Detection Exceedances	Number of Non-Detection Exceedances						Background Limits <sup>1</sup> (UTL) mg/L	SSI	Background Limits <sup>2</sup> (UTL) mg/L	SSI	GWPS (Higher of MCL/RSL or UTL) (mg/L)	SSL	
<b>CCR Appendix-IV: Arsenic, Total (mg/L)</b>																								
MW-FAA-5 (upgradient)	10/12	17%	0.001-0.001	0.0035	9.413E-07	0.0009702	0.5874	0.010	mg/L	N	0	0	No	No	Stable	Normal	<0.0010	0.0037				0.01		
MW-FAA-3	3/11	73%	0.001-0.001	0.0011	1.849E-09	0.000043	0.04304	0.010	mg/L	N	0	0	Yes	No	NT	Non-parametric	<0.0010		No				No	
MW-FAA-4	0/12	100%	0.0005-0.001		2.083E-08	0.0001443	0.1506	0.010	mg/L	N	0	0	NA	NA	NA	NA	<0.0010		No				No	
MW-FAA-6	11/11	0%	-	0.0086	2.104E-06	0.001451	0.2447	0.010	mg/L	N	0	0	No	No	Stable	Non-parametric	0.0037		No					No
<b>CCR Appendix-IV: Barium, Total (mg/L)</b>																								
MW-FAA-5 (upgradient)	3/12	75%	0.005-0.01	0.013	0.0000888	0.00298	0.4139	2	mg/L	N	0	0	No	No	NT	Normal	<0.0050	0.0136				2		
MW-FAA-3	11/11	0%	-	0.047	0.0003462	0.005884	0.1744	2	mg/L	N	0	0	No	No	Decreasing	Normal	0.036		Yes				No	
MW-FAA-4	12/12	0%	-	0.053	4.023E-06	0.002006	0.03991	2	mg/L	N	0	0	No	No	Stable	Normal	0.051		Yes				No	
MW-FAA-6	11/11	0%	-	0.067	0.0002264	0.01505	0.2678	2	mg/L	N	0	0	No	No	Stable	Non-parametric	0.033		Yes				No	
<b>CCR Appendix-IV: Cobalt, Total (mg/L)</b>																								
MW-FAA-5 (upgradient)	8/12	33%	0.001-0.001	0.0036	8.862E-07	0.0009414	0.6146	0.006	mg/L	N	0	0	No	No	Stable	Non-parametric	0.0022	0.0036				0.006		
MW-FAA-3	2/11	82%	0.001-0.001	0.00058	3.332E-08	0.0001825	0.1988	0.006	mg/L	N	0	0	No	No	NT	Non-parametric	<0.0010		No				No	
MW-FAA-4	0/12	100%	0.0005-0.001		2.083E-08	0.0001443	0.1506	0.006	mg/L	N	0	0	NA	NA	NA	NA	<0.0010		No				No	
MW-FAA-6	10/11	9%	0.001-0.001	0.0018	7.778E-08	0.0002789	0.2201	0.006	mg/L	N	0	0	No	No	Stable	Normal	0.0017		No				No	
<b>CCR Appendix-IV: Fluoride, Total (mg/L)</b>																								
MW-FAA-5 (upgradient)	13/13	0%	-	1.3	0.04995	0.2235	0.2767	4.0	mg/L	N	0	0	No	No	Stable	Normal	0.53	1.261				4.0		
MW-FAA-3	12/12	0%	-	0.4	0.001324	0.03639	0.1097	4.0	mg/L	N	0	0	No	No	Increasing	Normal	0.37		No				No	
MW-FAA-4	13/13	0%	-	0.4	0.001141	0.03378	0.09958	4.0	mg/L	N	0	0	No	No	Increasing	Normal	0.33		No				No	
MW-FAA-6	13/13	0%	-	1.1	0.02299	0.1516	0.1885	4.0	mg/L	N	0	0	No	No	Stable	Normal	0.62		No				No	
<b>CCR Appendix-IV: Lithium, Total (mg/L)</b>																								
MW-FAA-5 (upgradient)	12/12	0%	-	0.16	0.001096	0.03311	0.2844	0.040	mg/L	Y	12	0	No	No	Stable	Normal	0.082	0.183				0.183		
MW-FAA-3	10/11	9%	0.02-0.02	0.019	6.891E-06	0.002625	0.165	0.040	mg/L	N	0	0	No	No	Stable	Normal	0.014		No				No	
MW-FAA-4	9/12	25%	0.01-0.02	0.019	0.00001063	0.00326	0.2161	0.040	mg/L	N	0	0	No	No	Stable	Normal	0.019		No				No	
MW-FAA-6	8/11	27%	0.01-0.02	0.016	9.473E-06	0.003078	0.2453	0.040	mg/L	N	0	0	No	No	Stable	Non-parametric	0.014		No				No	
<b>CCR Appendix-IV: Molybdenum, Total (mg/L)</b>																								
MW-FAA-5 (upgradient)	12/12	0%	-	0.067	0.0003083	0.01756	0.5281	0.100	mg/L	N	0	0	No	No	Stable	Normal	0.024	0.0699				0.100		
MW-FAA-3	11/11	0%	-	0.014	8.682E-06	0.002947	0.2955	0.100	mg/L	N	0	0	No	No	Stable	Normal	0.0039		No				No	
MW-FAA-4	12/12	0%	-	0.0072	1.667E-06	0.001291	0.3893	0.100	mg/L	N	0	0	No	No	Stable	Normal	0.0072		No				No	
MW-FAA-6	11/11	0%	-	0.59	0.01573	0.1254	0.2718	0.100	mg/L	Y	11	0	No	No	Stable	Normal	0.22			0.928	No	0.928	No	
<b>CCR Appendix-IV: Radium-226 &amp; 228, Total (pCi/L)</b>																								
MW-FAA-5 (upgradient)	12/12	0%	-	1.907	0.2377	0.4876	0.6318	5	pCi/L	N	0	0	No	No	Stable	Normal	1.00	1.3				5		
MW-FAA-3	11/11	0%	-	1.22	0.2124	0.4609	1.031	5	pCi/L	N	0	0	No	No	Stable	Normal	0.352		No				No	
MW-FAA-4	12/12	0%	-	1.4	0.1555	0.3943	0.8058	5	pCi/L	N	0	0	No	No	Stable	Normal	1.40		Yes				No	
MW-FAA-6	11/11	0%	-	1.43	0.2965	0.5446	1.914	5	pCi/L	N	0	0	No	No	Stable	Normal	1.43		Yes				No	
<b>CCR Appendix-IV: Selenium, Total (mg/L)</b>																								
MW-FAA-5 (upgradient)	5/12	58%	0.0005-0.001	0.0039	0.00000109	0.001044	0.6295	0.05	mg/L	N	0	0	No	No	NT	Normal	0.0027	0.0037				0.05		
MW-FAA-3	0/11	100%	0.0005-0.001		2.273E-08	0.0001508	0.1579	0.05	mg/L	N	0	0	NA	NA	NA	NA	<0.0010		No				No	
MW-FAA-4	3/12	75%	0.001-0.001	0.0013	1.174E-08	0.0001084	0.1024	0.05	mg/L	N	0	0	No	No	NT	Non-parametric	0.0013		No				No	
MW-FAA-6	1/11	91%	0.0005-0.001	0.0011	2.455E-08	0.0001567	0.1626	0.05	mg/L	N	0	0	Yes	No	NT	Non-parametric	<0.0010		No				No	

**Notes and Abbreviations:**

<sup>1</sup> Based on background data collected from 08/19/2016 through 09/13/2018

<sup>2</sup> Based on background data collected from 08/19/2016 through 08/28/2017

CCR = coal combustion residuals

GWPS = Groundwater Protection Standard

MCL = maximum contaminant level

mg/L = milligrams per Liter

NA = not analyzed

pCi/L = picoCuries per Liter

RSL = regional screening level

SSI = statistically significant increase

SSL = statistically significant level






UTL = upper tolerance limits

**ATTACHMENT 3**  
**Groundwater Potentiometric Maps**



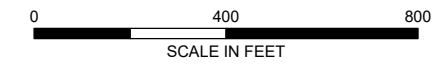


**LEGEND**

- MW-FAA-4** WELL NAME AND GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (AMSL), MARCH 2019
- 1167.47**
-  PIEZOMETER OBSERVATION ONLY
-  MONITORING WELL
-  ESTIMATED GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION CONTOUR, 2-FT INTERVAL (AMSL)
-  GROUNDWATER FLOW DIRECTION AND APPROXIMATE GROUNDWATER FLOW RATE (FEET/YEAR)
-  FLY ASH LANDFILL

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 26 MARCH 2019.
3. THE GROUNDWATER FLOW RATE WAS APPROXIMATED USING THE HYDRAULIC GRADIENT CALCULATED FROM GROUNDWATER POTENTIOMETRIC ELEVATIONS MEASURED 26 MARCH 2019 AND THE CONDUCTIVITY VALUES AND EFFECTIVE POROSITY VALUES OBTAINED FROM SLUG TESTS COMPLETED APRIL 2016.
4. AERIAL IMAGERY SOURCE: ESRI, 3 SEPTEMBER 2019



EVERGY KANSAS CENTRAL, INC.  
JEFFREY ENERGY CENTER  
ST. MARY'S, KANSAS

FLY ASH LANDFILL  
GROUNDWATER POTENTIOMETRIC  
ELEVATION CONTOUR MAP  
MARCH 26, 2019








NOVEMBER 2022





**LEGEND**

- MW-FAA-4** WELL NAME AND GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (AMSL), JUNE 2019
- 1167.47**
-  PIEZOMETER OBSERVATION ONLY
-  MONITORING WELL
-  ESTIMATED GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION CONTOUR, 2-FT INTERVAL (AMSL)
-  GROUNDWATER FLOW DIRECTION AND APPROXIMATE GROUNDWATER FLOW RATE (FEET/YEAR)
-  FLY ASH LANDFILL

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 23 JUNE 2019.
3. THE GROUNDWATER FLOW RATE WAS APPROXIMATED USING THE HYDRAULIC GRADIENT CALCULATED FROM GROUNDWATER POTENTIOMETRIC ELEVATIONS MEASURED 23 JUNE 2019 AND THE CONDUCTIVITY VALUES AND EFFECTIVE POROSITY VALUES OBTAINED FROM SLUG TESTS COMPLETED APRIL 2016.
4. AERIAL IMAGERY SOURCE: ESRI, 3 SEPTEMBER 2019



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ST. MARY'S, KANSAS

FLY ASH LANDFILL  
GROUNDWATER POTENTIOMETRIC  
ELEVATION CONTOUR MAP  
JUNE 23, 2019



NOVEMBER 2022





**LEGEND**

- MW-FAA-4** WELL NAME AND GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (AMSL), SEPTEMBER 2019
- 1167.47**
- PIEZOMETER OBSERVATION ONLY
- MONITORING WELL
- ESTIMATED GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION CONTOUR, 2-FT INTERVAL (AMSL)
- GROUNDWATER FLOW DIRECTION AND APPROXIMATE GROUNDWATER FLOW RATE (FEET/YEAR)
- FLY ASH LANDFILL

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 09 SEPTEMBER 2019.
3. THE GROUNDWATER FLOW RATE WAS APPROXIMATED USING THE HYDRAULIC GRADIENT CALCULATED FROM GROUNDWATER POTENTIOMETRIC ELEVATIONS MEASURED 09 SEPTEMBER 2019 AND THE CONDUCTIVITY VALUES AND EFFECTIVE POROSITY VALUES OBTAINED FROM SLUG TESTS COMPLETED APRIL 2016.
4. AERIAL IMAGERY SOURCE: ESRI, 3 SEPTEMBER 2019



EVERGY KANSAS CENTRAL, INC.  
JEFFREY ENERGY CENTER  
ST. MARY'S, KANSAS

FLY ASH LANDFILL  
GROUNDWATER POTENTIOMETRIC  
ELEVATION CONTOUR MAP  
SEPTEMBER 9, 2019



NOVEMBER 2022

FIGURE 4