



HALEY & ALDRICH, INC.  
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April 1, 2025  
File No. 0210977

Evergy Services, Inc.  
818 South Kansas Avenue  
Topeka, Kansas 66612

Attention: Jared Morrison – Director, Water and Waste Programs

Subject: Demonstration and Certification of Need for 60-Day Extension  
Corrective Measures Assessment (CMA)  
La Cygne Generating Station  
CCR Landfill, Lower AQC Impoundment, and Upper AQC Impoundment

Dear Mr. Morrison:

On behalf of Evergy Services, Inc. (Evergy), in accordance with Title 40 Code of Federal Regulations (40 CFR) § 257.96(a) of the U.S. Environmental Protection Agency Federal Coal Combustion Residuals (CCR) Rule (40 CFR §§ 257 and 261) effective October 19, 2015, including subsequent revisions, I certify that Evergy has demonstrated the need for an additional 60 days beyond the regulatory time period of 90 days to complete the assessment of corrective measures for the multi-unit groundwater monitoring program for the referenced CCR units at the La Cygne Generation Station due to site-specific conditions and the evaluation of remedial treatment alternatives in support of an informed CMA process.

In the case of the assessment for this multi-unit groundwater monitoring system, the site has complex hydrogeology in the form of fractured bedrock consisting of discontinuous beds of shale, limestone, and sandstone, including an uppermost aquifer that is confined to partially confined. Therefore, additional time is needed to conduct nature and extent (N&E) investigations which are ongoing in support of the CMA process.

N&E information is an important component of the CMA and will allow Evergy to refine the understanding of groundwater flow and solute transport. Remaining tasks in the N&E investigation include groundwater monitoring of newly installed N&E wells and evaluating groundwater and other analytical data, which will require an estimated additional 45 to 60 days given monitoring well recharge rates and laboratory turnaround times. Evergy is also in the process of completing groundwater modeling, evaluating human health and ecological risk, reviewing possible groundwater remedies as well as implementation of critical steps in the groundwater treatment and remedy assessment process, which will require an additional 45 to 60 days. Based on the above site-specific conditions and related groundwater treatment alternative evaluations in support of the CMA by Evergy, the CCR Rule allows for a 60-day extension to complete the CMA process.

Evergy Services, Inc.

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This certification as submitted is, to the best of my knowledge, accurate and complete.

Signed:   
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Certifying Engineer

Professional Engineer's Seal

Print Name: Steven F. Putrich, P.E.  
Kansas License No.: PE24363  
Title: Project Principal  
Company: Haley & Aldrich, Inc.

