2020 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

NORTH AND SOUTH ASH IMPOUNDMENTS MONTROSE GENERATING STATION CLINTON, MISSOURI

Presented To:
Evergy Metro, Inc.

SCS ENGINEERS

27213168.20 | January 2021 | Revision 1, April 2021

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Overland Park, Kansas 66210
913-681-0030

CERTIFICATIONS

I, John R. Rockhold, being a qualified groundwater scientist and Registered Geologist in the State of Missouri, do hereby certify that the 2020 Annual Groundwater Monitoring and Corrective Action Report for the North and South Ash Impoundments at the Montrose Generating Station was prepared by me or under my direct supervision and fulfills the requirements of 40 CFR 257.90(e).

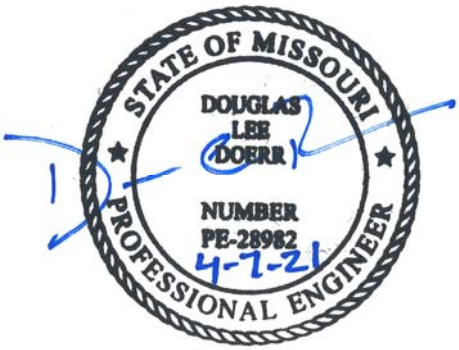
John R. Rockhold

Digitally signed by John R. Rockhold
Date: 2021.04.07 16:22:50 -05'00'

John R. Rockhold, R.G.

SCS Engineers

I, Douglas L. Doerr, being a qualified licensed Professional Engineer in the State of Missouri, do hereby certify that the 2020 Annual Groundwater Monitoring and Corrective Action Report for the North and South Ash Impoundments at the Montrose Generating Station was prepared by me or under my direct supervision and fulfills the requirements of 40 CFR 257.90(e).



Douglas L. Doerr, P.E.

SCS Engineers

Revision Number	Revision Date	Revision Sections	Summary of Revisions
1	April 7, 2021	Table of Contents Appendix A	Addition of Potentiometric Surface Map to Appendix A

Table of Contents

Section **Page**

Appendices

1 INTRODUCTION

This 2020 Annual Groundwater Monitoring and Corrective Action Report was prepared to support compliance with the groundwater monitoring requirements of the "Coal Combustion Residuals (CCR) Final Rule" (Rule) published by the United States Environmental Protection Agency (USEPA) in the *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule*, dated April 17, 2015 (USEPA, 2015), and subsequent revisions. Specifically, this report was prepared for Evergy Metro, Inc. (Evergy) to fulfill the requirements of 40 CFR 257.90 (e). The applicable sections of the Rule are provided below in *italics*, followed by applicable information relative to the 2020 Annual Groundwater Monitoring and Corrective Action Report for the North and South Ash Impoundments at the Montrose Generating Station.

1.1 § 257.90(e)(6) SUMMARY

A section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the CCR unit. At a minimum, the summary must specify all of the following:

1.1.1 § 257.90(e)(6)(i) Initial Monitoring Program

At the start of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95;

At the start of the current annual reporting period, (January 1, 2020), the CCR Impoundments were operating under a detection monitoring program in compliance with § 257.94.

1.1.2 § 257.90(e)(6)(ii) Final Monitoring Program

At the end of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95;

At the end of the current annual reporting period, (December 31, 2020), the CCR Impoundments were operating under a detection monitoring program in compliance with 40 CFR *257.94*. Following the observation visit for CCR removal certification by a licensed professional engineer July 9, 2020, the post-CCR removal groundwater sampling event took place on July 27, 2020. The CCR Impoundments were certified closed January 20, 2021, in accordance with 40 CFR 257.102(c) Closure by Removal of CCR.

1.1.3 § 257.90(e)(6)(iii) Statistically Significant Increases

If it was determined that there was a statistically significant increase over background for one or more constituents listed in Appendix III to this part pursuant to § 257.94(e):

(A) Identify those constituents listed in Appendix III to this part and the names of the monitoring wells associated with such an increase; and

Not applicable because statistically significant increases over background were not identified.

(B) Provide the date when the assessment monitoring program was initiated for the CCR unit.

Not applicable because an assessment monitoring program was not initiated.

1.1.4 § 257.90(e)(6)(iv) Statistically Significant Levels

If it was determined that there was a statistically significant level above the groundwater protection standard for one or more constituents listed in Appendix IV to this part pursuant to § 257.95(g) include all of the following:

(A) Identify those constituents listed in Appendix IV to this part and the names of the monitoring wells associated with such an increase;

Not applicable because there was no assessment monitoring conducted.

(B) Provide the date when the assessment of corrective measures was initiated for the CCR unit;

Not applicable because there was no assessment of corrective measures initiated for the CCR Unit.

(C) Provide the date when the public meeting was held for the assessment of corrective measures for the CCR unit*; and*

Not applicable because there was no assessment of corrective measures initiated for the CCR Unit.

(D) Provide the date when the assessment of corrective measures was completed for the CCR unit.

Not applicable because there was no assessment of corrective measures initiated for the CCR Unit.

1.1.5 § 257.90(e)(6)(v) Selection of Remedy

Whether a remedy was selected pursuant to § 257.97 during the current annual reporting period, and if so, the date of remedy selection; and

Not applicable because corrective measures are not required.

1.1.6 § 257.90(e)(6)(vi) Remedial Activities

Whether remedial activities were initiated or are ongoing pursuant to § 257.98 during the current annual reporting period.

Not applicable because corrective measures are not required.

2 § 257.90(E) ANNUAL REPORT REQUIREMENTS

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

2.1 § 257.90(E)(1) SITE MAP

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;

A site map with an aerial image showing the North and South Ash Impoundments and all background (or upgradient) and downgradient monitoring wells with identification numbers for the North and South Ash Impoundments groundwater monitoring program is provided as **Figure 1** in **Appendix A**.

2.2 § 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 new monitoring wells were installed and no wells were decommissioned as part of the CCR groundwater monitoring program for the North and South Ash Impoundments in 2020.

2.3 § 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;

Only detection monitoring was required to be conducted during the reporting period (2020). Samples collected in 2020 were collected and analyzed for Appendix III detection monitoring constituents. Additionally, Appendix IV constituents were analyzed with the spring event for potential future updating of background data in conformance with EPA Unified Guidance and industry standards. Results of the sampling events are provided in **Appendix B**, **Table 1** (Appendix III Detection with Supplemental and Post-CCR Removal Appendix IV Monitoring Results), and **Table 2** (Detection Monitoring Field Measurements).

A post-CCR removal monitoring event was conducted on July 27, 2020 following the July 9, 2020 CCR removal certification visit by a professional engineer. The post-CCR removal monitoring event was conducted as required by 40 CFR 257.102(c), which required the sampling of Appendix IV constituents. Results of the post-CCR removal monitoring event are also included in the tables in **Appendix B.**

The tables include Fall 2019 semiannual detection monitoring event verification sample data collected and analyzed in 2020; Spring 2020 semiannual detection monitoring data, verification sample data, and supplementary Appendix IV sample data; and, the July 2020 post-CCR removal groundwater monitoring data. The dates of sample collection and the monitoring program requiring the sample are also provided in these tables.

2.4 § 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

There was no transition between monitoring programs in 2020. Only detection monitoring was conducted in 2020. However, a post-CCR removal monitoring event was conducted in July 2020 following CCR removal in preparation for certification of closure by removal.

2.5 § 257.90(e)(5) OTHER REQUIREMENTS

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

A summary of potentially required information and the corresponding section of the Rule is provided in the following sections. In addition, the information, if applicable, is provided.

2.5.1 § 257.90(e) Program Status

Status of Groundwater Monitoring and Corrective Action Program.

The groundwater monitoring and corrective action program was in detection monitoring until CCR removal from the Impoundments at which time post-CCR removal sampling was performed.

Summary of Key Actions Completed.

a. completion of the Fall 2019 verification sampling and analyses per the certified statistical method,

b. completion of the statistical evaluation of the Fall 2019 semiannual detection monitoring sampling and analysis event per the certified statistical method,

c. completion of the 2019 Annual Groundwater Monitoring and Corrective Action Report,

d. completion of the Spring 2020 semiannual detection monitoring sampling and analysis event with subsequent verification sampling per the certified statistical method, and supplemental Appendix IV sample analysis,

e. completion of the statistical evaluation of the Spring 2020 semiannual detection monitoring sampling and analysis event per the certified statistical method, and

f. post-CCR removal sampling and analysis event in July 2020 in preparation for certification of closure by removal.

Description of Any Problems Encountered.

No noteworthy problems were encountered.

Discussion of Actions to Resolve the Problems.

Not applicable because no noteworthy problems were encountered.

Projection of Key Activities for the Upcoming Year (2021).

Completion of the certification of closure by removal of CCR from the CCR Impoundments. No further groundwater monitoring is required.

2.5.2 § 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).

Not applicable because no alternative monitoring frequency for detection monitoring and certification was pursued.

2.5.3 § 257.94(e)(2) Detection Monitoring Alternate Source Demonstration

Demonstration that a source other than the CCR unit caused the statistically significant increase (SSI) over background levels for a constituent or that the SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. In addition, certification of the demonstration is to be included in the annual report.

Not applicable because no such demonstration was conducted.

2.5.4 § 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 the approval from EPA where EPA is the permitting authority in the annual groundwater monitoring and corrective action report required by § 257.90(e).

Not applicable because there was no assessment monitoring conducted.

2.5.5 § 257.95(d)(3) Assessment Monitoring Concentrations and Groundwater Protection Standards

Include the concentrations of Appendix III and detected Appendix IV constituents from the assessment monitoring, the established background concentrations, and the established groundwater protection standards.

Not applicable because there was no assessment monitoring conducted.

2.5.6 § 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. 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.

Not applicable because there was no assessment monitoring conducted.

2.5.7 § 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 attesting that the demonstration is accurate. The 90-day deadline to complete the assessment of corrective measures may be extended for no longer than 60 days. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

Not applicable because there was no assessment monitoring conducted.

2.6 § 257.90(e)(6) OVERVIEW SUMMARY

A section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the CCR unit.

§ 257.90(e)(6) is addressed in Section 1.1 of this report.

3 GENERAL COMMENTS

This report has been prepared and reviewed under the direction of a qualified groundwater scientist and qualified professional engineer. The information contained in this report is a reflection of the conditions encountered at the Montrose Generating Station at the time of fieldwork. This report includes a review and compilation of the required information and does not reflect any variations of the subsurface, which may occur between sampling locations. Actual subsurface conditions may vary and the extent of such variations may not become evident without further investigation.

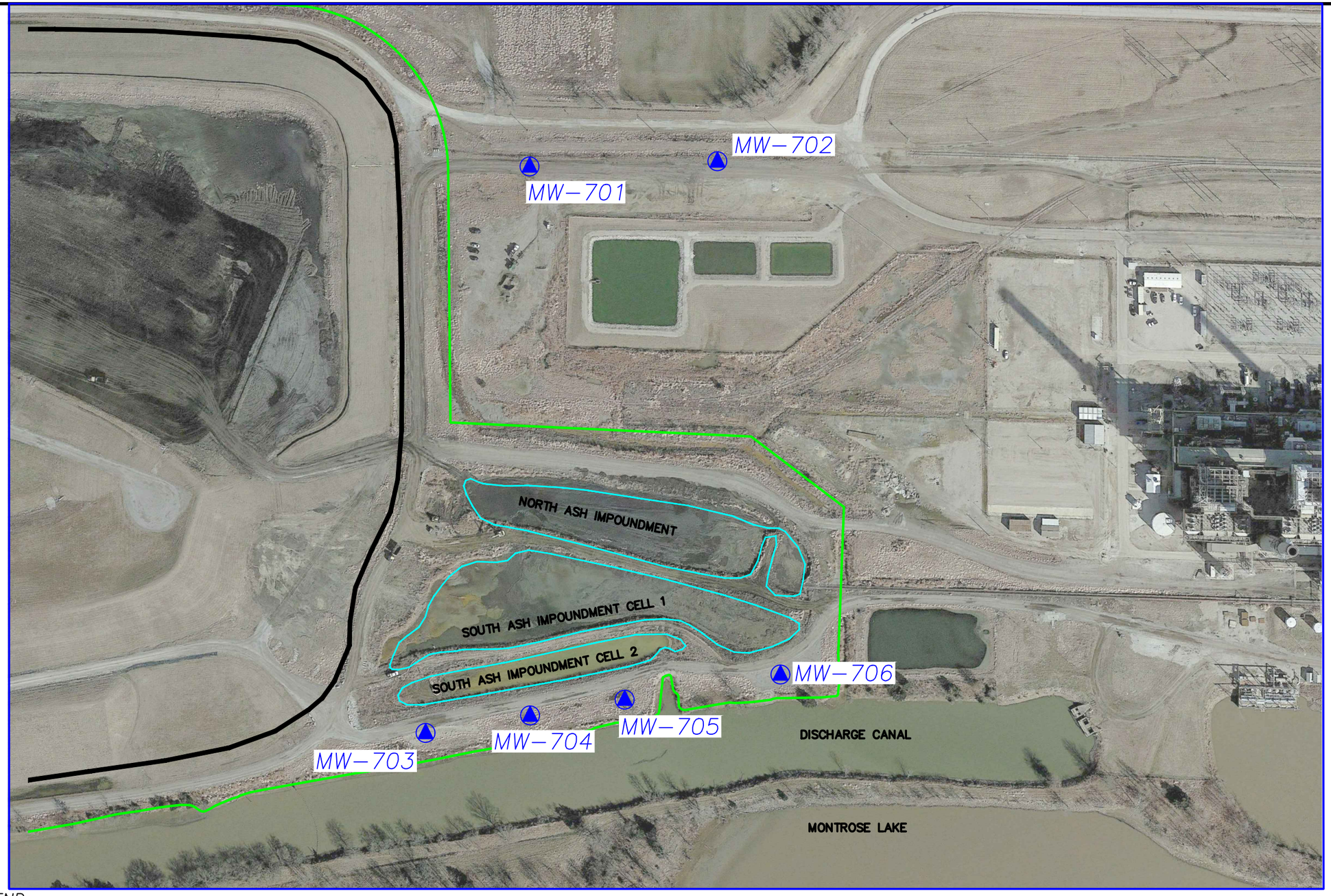
Conclusions drawn by others from the result of this work should recognize the limitation of the methods used. Please note that SCS Engineers does not warrant the work of regulatory agencies or other third parties supplying information used in the assimilation of this report. This report is prepared in accordance with generally accepted environmental engineering and geological practices, within the constraints of the client's directives. It is intended for the exclusive use of Evergy Metro, Inc. for specific application to the Montrose Generating Station North and South Ash Impoundments. No warranties, express or implied, are intended or made.

APPENDIX A

FIGURES

Figure 1: Site Map

Figure 2: Potentiometric Surface Map (May 2020)



LEGEND:

- PERMITTERED SOLID WASTE FACILITY BOUNDARY (APPROXIMATE)
- CCR LANDFILL UNIT BOUNDARY (APPROXIMATE)
- MW–706 CCR GROUNDWATER MONITORING WELL SYSTEM
- ASH IMPOUNDMENT UNIT BOUNDARY (APPROXIMATE)

NOTES:

1. HORIZONTAL DATUM: MISSOURI STATE PLANE COORDINATE SYSTEM, WEST ZONE (NAD 83)
2. VERTICAL DATUM: NAVD 88
3. GOOGLE EARTH IMAGE DATED MARCH 2020.
4. APPROXIMATE BOUNDARY LOCATIONS PROVIDED BY AECOM.
5. MONITOR WELL LOCATIONS PROVIDED BY SHAFFER, KLINE, & WARREN SURVEY DATED JULY 21, 2017.

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SHEET TITLE
SITE MAP
NORTH AND SOUTH ASH IMPOUNDMENT
CCR GROUNDWATER MONITORING SYSTEM

PROJECT TITLE
2020 GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

CLIENT
EVERGY METRO, INC.
MONTROSE GENERATING STATION
MONTROSE, MISSOURI

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PROJ. NO.	DWN. BY:	O/A RVW BY:
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DSN. BY:	CHK. BY:	PROJ. MGR.
ALR	JRR	JRF

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FIGURE NO.
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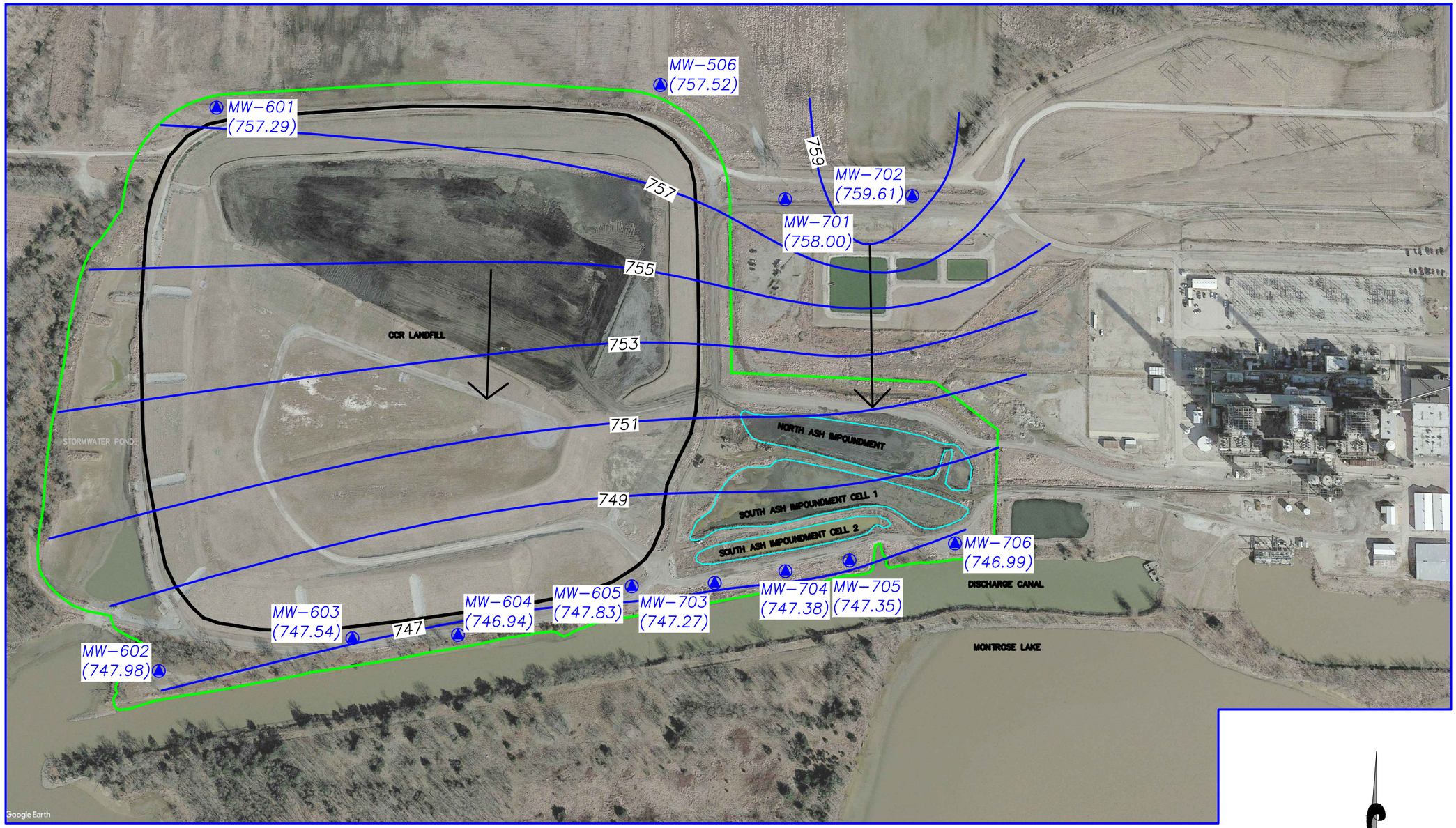

LEGEND:

- PERMITTERED SOLID WASTE FACILITY BOUNDARY (APPROXIMATE)
- CCR LANDFILL UNIT BOUNDARY (APPROXIMATE)
- MW-506 (757.17) — CCR GROUNDWATER MONITORING WELL SYSTEM
- ASH IMPOUNDMENT UNIT BOUNDARY (APPROXIMATE)
- GROUNDWATER POTENTIOMETRIC SURFACE ELEVATIONS (REPRESENTATIVE OF THIS UNIT)
- GROUNDWATER FLOW ARROW

NOTES:

1. HORIZONTAL DATUM: MISSOURI STATE PLANE COORDINATE SYSTEM, WEST ZONE (NAD 83)
2. VERTICAL DATUM: NAVD 88
3. GOOGLE EARTH IMAGE DATED MARCH 2020.
4. APPROXIMATE BOUNDARY LOCATIONS PROVIDED BY AECOM.
5. MONITOR WELL LOCATIONS PROVIDED BY SHAFFER, KLINE, & WARREN SURVEY DATED JULY 21, 2017.

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SHEET TITLE
POTENTIOMETRIC SURFACE MAP (MAY 2020)

PROJECT TITLE
MONTROSE GROUNDWATER 2020

CLIENT
EVERGY METRO, INC.
MONTROSE GENERATING STATION
MONTROSE, MISSOURI

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PROJ. NO.	27213168.20
DSN. BY:	MBJ
CHK. BY:	JRR
DSN. BY:	TGW
Q/A RVW BY:	JRR
PROJ. MGR	JRF

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FIGURE NO. **2**

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APPENDIX B

TABLES

Table 1: Appendix III Detection with Supplemental and Post-CCR Removal Appendix IV Monitoring Results

Table 2: Detection Monitoring Field Measurements

Table 1
North and South Ash Impoundments
Appendix III Detection with Supplemental and Post-CCR Removal Appendix IV Monitoring Results
Evergy Montrose Generating Station

Well Number	Sample Date	Appendix III Constituents							Appendix IV Constituents														
		Boron (mg/L)	Calcium (mg/L)	Chloride (mg/L)	Fluoride (mg/L)	pH (S.U.)	Sulfate (mg/L)	Total Dissolved Solids (mg/L)	Antimony (mg/L)	Arsenic (mg/L)	Barium (mg/L)	Beryllium (mg/L)	Cadmium (mg/L)	Chromium (mg/L)	Cobalt (mg/L)	Fluoride (mg/L)	Lead (mg/L)	Lithium (mg/L)	Mercury (mg/L)	Molybdenum (mg/L)	Selenium (mg/L)	Thallium (mg/L)	Radium Combined (pCi/L)
MW-701	5/21/2020	<0.200	432	496	1.09	4.35	1910	3540	<0.00400	<0.00200	0.00850	0.00211	0.00507	<0.0100	0.0309	1.09	<0.00500	0.197	0.000476	<0.00500	0.00789	<0.00200	0.575
MW-701	7/27/2020	---	---	---	---	**4.38	---	---	<0.00400	<0.00200	0.00826	<0.00200	0.00431	<0.0100	0.0221	1.02	<0.00500	0.186	0.000287	<0.00500	0.00706	<0.00200	2.18
MW-702	5/21/2020	<0.200	423	238	0.260	6.28	1430	2780	<0.00400	0.00309	0.0119	<0.00200	<0.00100	<0.0100	<0.0100	0.260	<0.00500	0.0519	<0.000200	<0.00500	<0.00200	<0.00200	0.863
MW-702	7/27/2020	---	---	---	---	**6.63	---	---	<0.00400	<0.00200	0.0141	<0.00200	<0.00100	<0.0100	0.00461	0.185	<0.00500	0.0439	<0.000200	<0.00500	<0.00200	<0.00200	0.455
MW-703	5/21/2020	<0.200	192	8.16	0.197	6.08	735	1170	<0.00400	<0.00200	0.0352	<0.00200	<0.00100	<0.0100	<0.0100	0.197	<0.00500	0.0584	<0.000200	<0.00500	<0.00200	<0.00200	0.739
MW-703	7/27/2020	---	---	---	---	**6.50	---	---	<0.00400	<0.00200	0.0394	<0.00200	<0.00100	<0.0100	0.00443	0.131	<0.00500	0.0535	<0.000200	<0.00500	<0.00200	<0.00200	3.07
MW-704	5/21/2020	<0.200	156	3.03	<0.150	6.30	722	1120	<0.00400	0.0137	0.0526	<0.00200	<0.00100	<0.0100	<0.0100	<0.150	<0.00500	0.0545	<0.000200	<0.00500	<0.00200	<0.00200	1.77
MW-704	7/27/2020	---	---	---	---	**6.40	---	---	<0.00400	0.0131	0.0561	<0.00200	<0.00100	<0.0100	0.00708	0.119	<0.00500	0.0505	<0.000200	<0.00500	<0.00200	<0.00200	0.894
MW-705	5/21/2020	<0.200	185	10.4	0.205	6.52	796	1290	<0.00400	0.00647	0.0547	<0.00200	<0.00100	<0.0100	<0.0100	0.205	<0.00500	0.0695	<0.000200	<0.00500	<0.00200	<0.00200	0.945
MW-705	7/14/2020	---	*163	---	---	**6.71	*705	*1190	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
MW-705	7/27/2020	---	---	---	---	**6.59	---	---	<0.00400	0.0045	0.0458	<0.00200	<0.00100	<0.0100	<0.00200	0.196	<0.00500	0.0615	<0.000200	<0.00500	<0.00200	<0.00200	2.43
MW-706	5/21/2020	0.269	270	29.5	0.165	6.28	1110	1800	<0.00400	0.0124	0.0304	<0.00200	<0.00100	<0.0100	0.0103	0.165	<0.00500	0.0472	<0.000200	<0.00500	<0.00200	<0.00200	1.58
MW-706	7/14/2020	*0.228	---	---	---	**6.52	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
MW-706	7/27/2020	---	---	---	---	**6.55	---	---	<0.00400	0.0136	0.0310	<0.00200	<0.00100	<0.0100	0.00709	0.184	<0.00500	0.0498	<0.000200	<0.00500	<0.00200	<0.00200	2.07

* Verification Sample obtained per certified statistical method and Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance, March 2009.
**Extra Sample for Quality Control Validation or per Standard Sampling Procedure
mg/L - miligrams per liter
pCi/L - picocuries per liter
S.U. - Standard Units
--- Not Sampled

Table 2
North and South Ash Impoundments
Detection Monitoring Field Measurements
Evergy Montrose Generating Station

Well Number	Sample Date	pH (S.U.)	Specific Conductivity (µS)	Temperature (°C)	Turbidity (NTU)	ORP (mV)	DO (mg/L)	Water Level (ft btoc)	Groundwater Elevation (ft NGVD)
MW-701	5/21/2020	4.35	3800	17.37	0.0	347	7.53	5.48	758.00
MW-701	7/27/2020	**4.38	3400	20.14	0.0	320	6.02	9.54	753.94
MW-702	5/21/2020	6.28	3140	19.07	5.9	143	0.74	4.14	759.61
MW-702	7/27/2020	**6.63	2880	19.34	13.3	130	0.00	7.55	756.20
MW-703	5/21/2020	6.08	1520	18.24	18.1	52	0.00	13.16	747.27
MW-703	7/27/2020	**6.50	1610	19.43	21.2	-63	6.65	11.90	748.53
MW-704	5/21/2020	6.30	1390	19.54	21.1	-84	0.33	12.50	747.38
MW-704	7/27/2020	**6.40	1360	20.14	38.4	-85	6.19	11.38	748.50
MW-705	5/21/2020	6.52	1580	17.77	6.0	-99	0.37	10.58	747.35
MW-705	7/14/2020	**6.71	1480	19.05	0.0	-60	0.32	9.20	748.73
MW-705	7/27/2020	**6.59	1360	19.46	2.1	-118	0.00	9.43	748.50
MW-706	5/21/2020	6.28	2040	19.74	11.6	-7	0.72	12.21	746.99
MW-706	7/14/2020	**6.52	2120	19.24	8.8	-45	0.87	10.27	748.93
MW-706	7/27/2020	**6.55	1940	21.71	9.6	-84	5.30	10.48	748.72

* Verification Sample obtained per certified statistical method and Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance, March 2009.
**Extra Sample for Quality Control Validation or per Standard Sampling Procedure
S.U. - Standard Units
µS - microsiemens
°C - Degrees Celsius
ft btoc - Feet Below Top of Casing
ft NGVD - National Geodetic Vertical Datum (NAVD 88)
NTU - Nephelometric Turbidity Unit