

### 2017 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT 322 LANDFILL TECUMSEH ENERGY CENTER TECUMSEH, KANSAS

by Haley & Aldrich, Inc. Cleveland, Ohio

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

File No. 129778-041 January 2018

Revised: March 2021

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Revision No.	Date	Notes
0	January 2018	Original
1	March 2021	Revised to include groundwater potentiometric contour maps covered in this 2017 annual report

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This Annual Groundwater Monitoring and Corrective Action Report documents the groundwater monitoring system for the Tecumseh Energy Center (TEC) 322 Landfill consistent with applicable sections of 257.90 through 257.98, and describes activities conducted in the prior calendar year (2017) and documents compliance with the U.S. Environmental Protection Agency Coal Combustion Residual Rule. I certify that the 2017 Annual Groundwater Monitoring and Corrective Action Report for the TEC 322 Landfill is, to the best of my knowledge, accurate and complete.

Signed:

**Professional Geologist** 

Print Name: Mark Nicholls

Kansas License No.: Professional Geologist No. 881

Title: Technical Expert 2

Company: Haley & Aldrich, Inc.

#### 1. Introduction

This 2017 Annual Groundwater Monitoring and Corrective Action Report (Annual Report) addresses the 322 Landfill at the Tecumseh Energy Center (TEC), operated by Evergy Kansas Central, Inc. (Evergy; f/k/a Westar Energy, Inc.). This Annual Report was developed in accordance with the U.S. Environmental Protection Agency Coal Combustion Residual (CCR) Rule effective October 19, 2015 (Rule), specifically Code of Federal Regulations Title 40 (40 CFR), subsection § 257.90(e). The Annual Report documents the groundwater monitoring system for the TEC 322 Landfill consistent with applicable sections of 257.90 through 257.98, and describes activities conducted in the prior calendar year (2017) and documents compliance with the Rule. The specific requirements for the annual report listed in § 257.90(e) 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)

Except as provided for in § 257.100 for inactive CCR surface impoundments, 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 257.98.

The 322 Landfill at the Tecumseh Energy Center (TEC), which is the coal combustion residuals (CCR) management unit addressed in this Annual Groundwater Monitoring and Corrective Action Report (Annual Report), 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. In particular, this document addresses the requirement for the Owner/Operator to prepare an Annual Report per § 257.90(e) (Rule).

#### 2.2 40 CFR § 257.90(e)

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 is the initial report for the TEC 322 Landfill as required by the Rule as the groundwater monitoring system was established and certified by October 17, 2017. Prior to October 17, 2017, Evergy Kansas Central, Inc. (Evergy; f/k/a Westar Energy, Inc.) installed a groundwater monitoring system at the 322 Landfill consistent with § 257.91. Groundwater sampling and analysis were conducted per the requirements described in § 257.93, and the status of the groundwater monitoring program described in § 257.94 is provided in this report. This Annual Report documents the activities completed in the calendar year 2017.

#### 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 322 Landfill is included in this report as Figure 1. In addition, this information is presented in the CCR Groundwater Monitoring Network Description Report prepared for Evergy, which was placed in the facility's operating record by October 17, 2017 as required by § 257.105(h)(2).

#### 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;

The design and construction of the monitoring well network for the TEC 322 Landfill are described in the CCR Groundwater Monitoring Network Description Report dated October 17, 2017. This report was placed in the facility's operating record by October 17, 2017, as required by § 257.105(h)(2). Since the groundwater monitoring system was certified, no new monitoring wells were installed or decommissioned.

#### 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 § 257.94(b), eight independent samples from each background and downgradient monitoring well were collected prior to October 17, 2017. A summary table including the sample names, dates of sample collection, reason for sample collection (detection or assessment), and monitoring data obtained for the groundwater monitoring program for the 322 Landfill is presented in Table I of this report. In 2017, the groundwater monitoring sampling and laboratory analyses were completed under the detection monitoring program. Groundwater potentiometric elevation contour maps associated with each groundwater monitoring sampling event in 2016 and 2017 are provided in Figures 2 through 9.

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

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

Detection monitoring was conducted in accordance with § 257.94(b), and no transitions between monitoring programs occurred for the 322 Landfill in calendar year 2017.

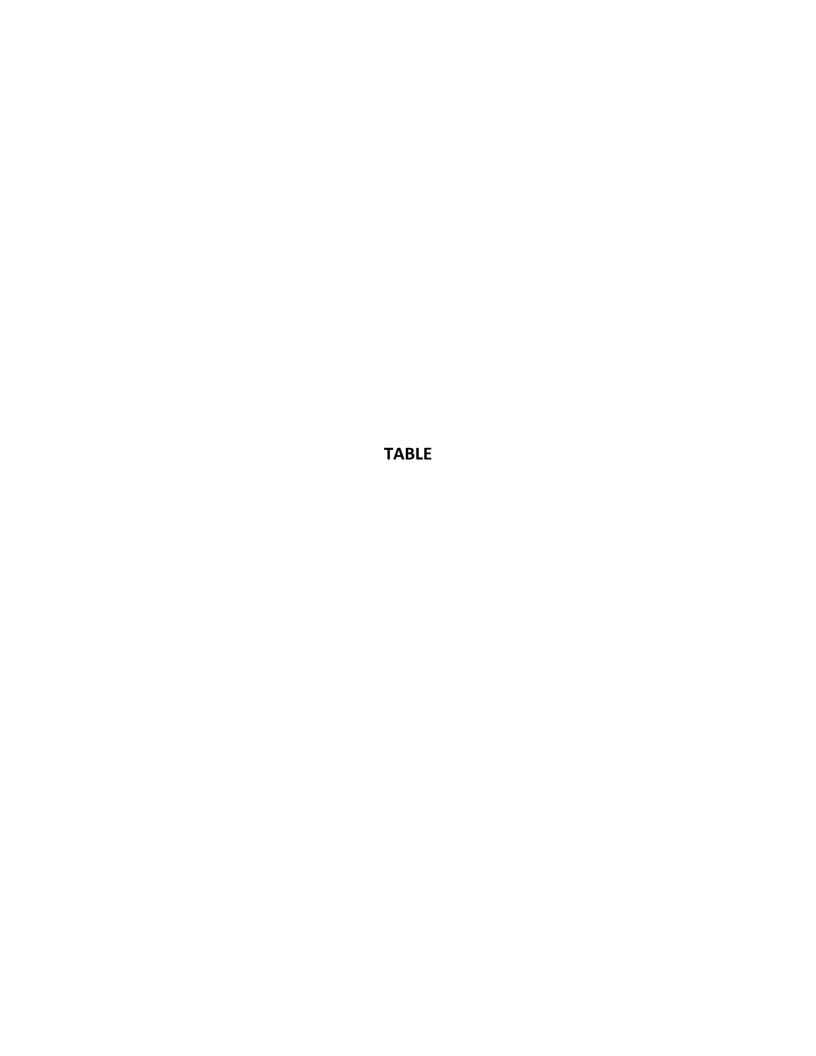


#### 2.3.5 40 CFR § 257.90(e)(5) – Other Requirements

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

This initial Annual Report documents activities conducted to comply with § 257.90 through § 257.94 of the Rule. It is understood that there are supplemental references in § 257.90 through § 257.98 to information that must be placed in the Annual Report; however, none of the activities referenced as required in the Annual Report are relevant to the groundwater monitoring program for activities completed in calendar year 2017.





#### **SUMMARY OF ANALYTICAL RESULTS**

EVERGY KANSAS CENTRAL, INC. TECUMSEH ENERGY CENTER 322 LANDFILL TECUMSEH, KANSAS

Location		Measure Point	Sample Name	Sample Date	Depth to Water (btoc)	Groundwater Elevation		Field Paramete	USEPA Appendix III Constituents (mg/L)								
		Elevation (TOC)		Sample Date		(ft AMSL)	Temperature (Deg C)							Fluoride	Sulfate	pH (su)	TDS
			MW-4-081716	8/17/2016	4.90	931.58	21.04	1730	6.2	7.09	<0.10	179	263	0.24	137	7.0	1070
			MW-4-092016	9/20/2016	3.74	932.74	19.14	1780	3.4	6.90	<0.10	176	271	0.24	141	7.2	1080
j,			MW-4-110116	11/1/2016	3.96	932.52	16.52	1720	3.4	6.87	<0.10	180	251	0.23	128	7.2	1060
Up Gradient	MW-4	936.48	MW-4-121316	12/13/2016	4.08	932.40	10.26	1740	7.0	6.85	<0.10	183	268	0.24	142	7.3	935
G	10100 4	330.40	MW-4-020617	2/6/2017	4.16	932.32	10.54	1710	4.4	6.86	<0.10	188	263	<0.20	140	7.2	1000
ž			MW-4-040517	4/5/2017	3.05	933.43	11.78	1700	5.4	7.04	<0.10	182	261	0.23	143	7.2	1030
			MW-4-052317	5/23/2017	3.81	932.67	15.45	1720	5.1	6.96	<0.10	173	266	<0.20	126	7.3	980
			MW-4-062717	6/27/2017	4.54	931.94	15.97	1710	3.4	6.71	<0.10	180	255	<0.20	137	7.2	1040
		904.65	MW-1-081816	8/18/2016	4.56	900.09	17.84	1266	4.0	7.03	<0.10	158	42.6	0.32	337	7.0	920
			MW-1-092016	9/20/2016	3.83	900.82	19.09	1305	2.6	6.85	0.15	158	39.3	0.36	359	7.2	913
	MW-1		MW-1-110116	11/1/2016	3.92	900.73	16.69	1388	8.3	6.69	0.31	171	29.6	0.39	452	7.1	925
			MW-1-121316	12/13/2016	4.01	900.64	11.82	1405	40.9	6.93	0.38	168	21.4	0.36	400	7.3	937
			MW-1-020617	2/6/2017	3.96	900.69	10.37	1390	45.5	6.89	0.34	184	22.5	0.30	450	7.0	993
			MW-1-040517	4/5/2017	3.39	901.26	11.48	1385	25.6	6.97	0.50	176	22.5	0.46	455	7.1	984
			MW-1-052417	5/24/2017	3.80	900.85	14.04	1330	9.7	6.90	0.88	165	18.7	0.37	357	7.4	905
			MW-1-062717	6/27/2017	4.05	900.60	16.06	1387	6.3	6.82	0.84	171	19.4	0.39	358	7.1	999
		916.18	MW-5-081816	8/18/2016	6.12	910.06	20.91	1800	25.6	7.00	0.35	241	49.2	0.25	653	6.9	1380
			MW-5-092016	9/20/2016	5.41	910.77	19.14	2280	3.5	6.79	1.2	291	49.3	0.28	868	7.0	1690
ient			MW-5-110116	11/1/2016	5.48	910.70	16.63	2340	3.0	6.57	1.2	316	45.3	0.33	1020	7.0	1810
Down Gradient	MW-5		MW-5-121316	12/13/2016	5.94	910.24	10.15	2280	6.7	6.69	1.0	303	45.3	0.33	797	7.1	1620
e e	IVIVV-5		MW-5-020617	2/6/2017	6.10	910.08	10.69	2280	4.9	6.49	0.98	321	45.9	<0.20	874	6.9	1740
NO O			MW-5-040517	4/5/2017	4.83	911.35	12.15	2240	5.3	6.81	1.2	318	42.9	0.30	892	7.0	1650
_			MW-5-052317	5/23/2017	5.45	910.73	14.64	2180	3.8	6.85	1.1	299	40.9	0.28	829	7.4	1530
			MW-5-062717	6/27/2017	5.61	910.57	16.38	2160	2.6	6.65	1.1	297	39.6	0.42	786	7.0	1690
			MW-6-081716	8/17/2016	8.53	902.75	20.71	2110	188	7.08	1.1	275	65.8	0.28	764	7.0	1790
		011 20	MW-6-092016	9/20/2016	8.02	903.26	19.75	2160	94.0	6.93	1.1	276	64.3	0.31	857	7.1	1690
			MW-6-110116	11/1/2016	8.01	903.27	18.26	2210	23.5	6.75	1.1	311	59.4	0.39	975	7.1	1690
	MW-6		MW-6-121316	12/13/2016	8.15	903.13	13.10	2250	22.0	6.91	1.0	302	60.3	0.29	835	7.2	1620
	IVI VV-O	911.28	MW-6-020617	2/6/2017	8.21	903.07	10.91	2250	7.3	6.73	1.1	323	59.8	0.28	876	7.0	1800
			MW-6-040517	4/5/2017	6.90	904.38	12.30	2320	6.4	6.98	0.98	328	59.8	0.38	967	7.2	1810
			MW-6-052417	5/24/2017	8.04	903.24	11.98	2300	7.8	6.75	0.92	330	63.0	0.31	853	7.4	1680
			MW-6-062717	6/27/2017	8.22	903.06	15.74	2240	5.2	6.76	0.86	323	61.1	0.50	874	7.1	1700

#### ABBREVIATIONS AND NOTES:

#### Bold value: Detection above laboratory reporting limit

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

C = Celsius

CCR = coal combustion residuals

ft AMSL = feet above mean sea level

MCL = maximum contaminant level

mg/L = milligrams per liter

NA = not applicable

NTU = Nephelometric Turbidity Units

pCi/L = picoCurie per liter

su = standard units

TDS = total dissolved solids

TOC = top of casing

USEPA = United States Environmental Protection Agency



#### **SUMMARY OF ANALYTICAL RESULTS**

EVERGY KANSAS CENTRAL, INC. TECUMSEH ENERGY CENTER 322 LANDFILL TECUMSEH, KANSAS

Location		Measure Point	Sample Name	Sample Date	Depth to Water	Groundwater Elevation	USEPA Appendix IV Constituents (mg/L)														USEPA Appendix IV Constituents (pCi/L)
	cution	Elevation (TOC)	Sample Name	Sumple But	(btoc)	(ft AMSL)	Antimony, Total	Arsenic, Total	Barium, Total	Beryllium, Total	Cadmium, Total	Chromium, Total	Cobalt, Total	Lead, Total	Lithium, Total	Molybdenum, Total	Selenium, Total	Thallium, Total	Mercury, Total	Fluoride	Radium-226 & 228 Combined
			MW-4-081716	8/17/2016	4.90	931.58	<0.0010	<0.0010	0.14	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.24	1.92
			MW-4-092016	9/20/2016	3.74	932.74	<0.0010	<0.0010	0.13	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.24	2.46
t :			MW-4-110116	11/1/2016	3.96	932.52	<0.0010	<0.0010	0.12	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.23	2.11
Gradie	MW-4	936.48	MW-4-121316	12/13/2016	4.08	932.40	<0.0010	<0.0010	0.12	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.24	1.12
	10100 4	330.40	MW-4-020617	2/6/2017	4.16	932.32	<0.0010	<0.0010	0.12	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	< 0.010	<0.0010	<0.0010	<0.0010	<0.00020	<0.20	0.879
ď			MW-4-040517	4/5/2017	3.05	933.43	<0.0010	<0.0010	0.11	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	< 0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.23	1.10
			MW-4-052317	5/23/2017	3.81	932.67	<0.0010	<0.0010	0.11	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	< 0.010	<0.0010	<0.0010	<0.0010	<0.00020	<0.20	0.885
			MW-4-062717	6/27/2017	4.54	931.94	<0.0010	<0.0010	0.12	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	<0.20	2.64
		904.65	MW-1-081816	8/18/2016	4.56	900.09	<0.0010	<0.0010	0.094	<0.0010	<0.00050	<0.0050	0.0029	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.32	0.56
			MW-1-092016	9/20/2016	3.83	900.82	<0.0010	<0.0010	0.12	<0.0010	<0.00050	<0.0050	0.0054	<0.0050	< 0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.36	1.78
			MW-1-110116	11/1/2016	3.92	900.73	<0.0010	<0.0010	0.20	<0.0010	<0.00050	<0.0050	0.0086	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.39	0.997
	MW-1		MW-1-121316	12/13/2016	4.01	900.64	<0.0010	<0.0010	0.16	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.36	0.164
			MW-1-020617	2/6/2017	3.96	900.69	<0.0010	<0.0010	0.20	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.30	0.467
			MW-1-040517	4/5/2017	3.39	901.26	<0.0010	<0.0010	0.20	<0.0010	<0.00050	<0.0050	0.0014	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.46	0.455
			MW-1-052417	5/24/2017	3.80	900.85	<0.0010	0.0017	0.19	<0.0010	<0.00050	<0.0050	<0.0010	<0.0050	<0.010	0.0011	<0.0010	<0.0010	<0.00020	0.37	1.07
			MW-1-062717	6/27/2017	4.05	900.60	<0.0010	0.0023	0.20	<0.0010	<0.00050	<0.0050	0.0014	<0.0050	< 0.010	0.0011	<0.0010	<0.0010	<0.00020	0.39	0.174
		916.18	MW-5-081816	8/18/2016	6.12	910.06	<0.0010	<0.0010	0.04	<0.0010	<0.00050	<0.0050	0.0011	<0.0050	0.021	<0.0010	<0.0010	<0.0010	<0.00020	0.25	1.04
			MW-5-092016	9/20/2016	5.41	910.77	<0.0010	<0.0010	0.033	<0.0010	<0.00050	<0.0050	0.0018	<0.0050	0.019	<0.0010	<0.0010	<0.0010	<0.00020	0.28	1.07
ient			MW-5-110116	11/1/2016	5.48	910.70	<0.0010	<0.0010	0.030	<0.0010	<0.00050	<0.0050	0.0021	<0.0050	0.022	<0.0010	<0.0010	<0.0010	<0.00020	0.33	1.48
irad	MW-5		MW-5-121316	12/13/2016	5.94	910.24	<0.0010	<0.0010	0.028	<0.0010	<0.00050	<0.0050	0.0020	<0.0050	0.024	<0.0010	<0.0010	<0.0010	<0.00020	0.33	1.06
E E	IVIVV-5		MW-5-020617	2/6/2017	6.10	910.08	<0.0010	<0.0010	0.026	<0.0010	<0.00050	<0.0050	0.0018	<0.0050	0.014	<0.0010	<0.0010	<0.0010	<0.00020	<0.20	0.893
ŏ			MW-5-040517	4/5/2017	4.83	911.35	<0.0010	<0.0010	0.021	<0.0010	<0.00050	<0.0050	0.0021	<0.0050	<0.010	0.0010	<0.0010	<0.0010	<0.00020	0.30	0.970
_			MW-5-052317	5/23/2017	5.45	910.73	<0.0010	<0.0010	0.022	<0.0010	<0.00050	<0.0050	0.0021	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.28	0.940
			MW-5-062717	6/27/2017	5.61	910.57	<0.0010	<0.0010	0.026	<0.0010	<0.00050	<0.0050	0.0020	<0.0050	< 0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.42	1.23
			MW-6-081716	8/17/2016	8.53	902.75	<0.0010	<0.0010	0.041	<0.0010	<0.00050	<0.0050	0.0031	<0.0050	0.018	0.0019	<0.0010	<0.0010	<0.00020	0.28	0.68
			MW-6-092016	9/20/2016	8.02	903.26	<0.0010	<0.0010	0.034	<0.0010	<0.00050	<0.0050	0.0033	<0.0050	0.017	0.0014	<0.0010	<0.0010	<0.00020	0.31	0.35
			MW-6-110116	11/1/2016	8.01	903.27	<0.0010	<0.0010	0.029	<0.0010	<0.00050	<0.0050	0.0031	<0.0050	0.018	0.0012	<0.0010	<0.0010	<0.00020	0.39	0.688
	MW-6	011 20	MW-6-121316	12/13/2016	8.15	903.13	<0.0010	<0.0010	0.028	<0.0010	<0.00050	<0.0050	0.0029	<0.0050	0.022	<0.0010	<0.0010	<0.0010	<0.00020	0.29	0.653
	IVIVV-0	911.28	MW-6-020617	2/6/2017	8.21	903.07	<0.0010	<0.0010	0.028	<0.0010	<0.00050	<0.0050	0.0016	<0.0050	0.013	0.0011	<0.0010	<0.0010	<0.00020	0.28	0.582
			MW-6-040517	4/5/2017	6.90	904.38	<0.0010	<0.0010	0.023	<0.0010	<0.00050	<0.0050	0.0016	<0.0050	0.011	0.0012	<0.0010	<0.0010	<0.00020	0.38	0.224
			MW-6-052417	5/24/2017	8.04	903.24	<0.0010	<0.0010	0.021	<0.0010	<0.00050	<0.0050	0.0017	<0.0050	<0.010	0.0010	<0.0010	<0.0010	<0.00020	0.31	1.13
			MW-6-062717	6/27/2017	8.22	903.06	<0.0010	<0.0010	0.019	<0.0010	<0.00050	<0.0050	0.0018	<0.0050	<0.010	<0.0010	<0.0010	<0.0010	<0.00020	0.50	0.545

#### ABBREVIATIONS AND NOTES:

#### Bold value: Detection above laboratory reporting limit

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

C = Celsius

 $CCR = coal\ combustion\ residuals$ 

ft AMSL = feet above mean sea level

MCL = maximum contaminant level

mg/L = milligrams per liter

NA = not applicable

NTU = Nephelometric Turbidity Units

pCi/L = picoCurie per liter

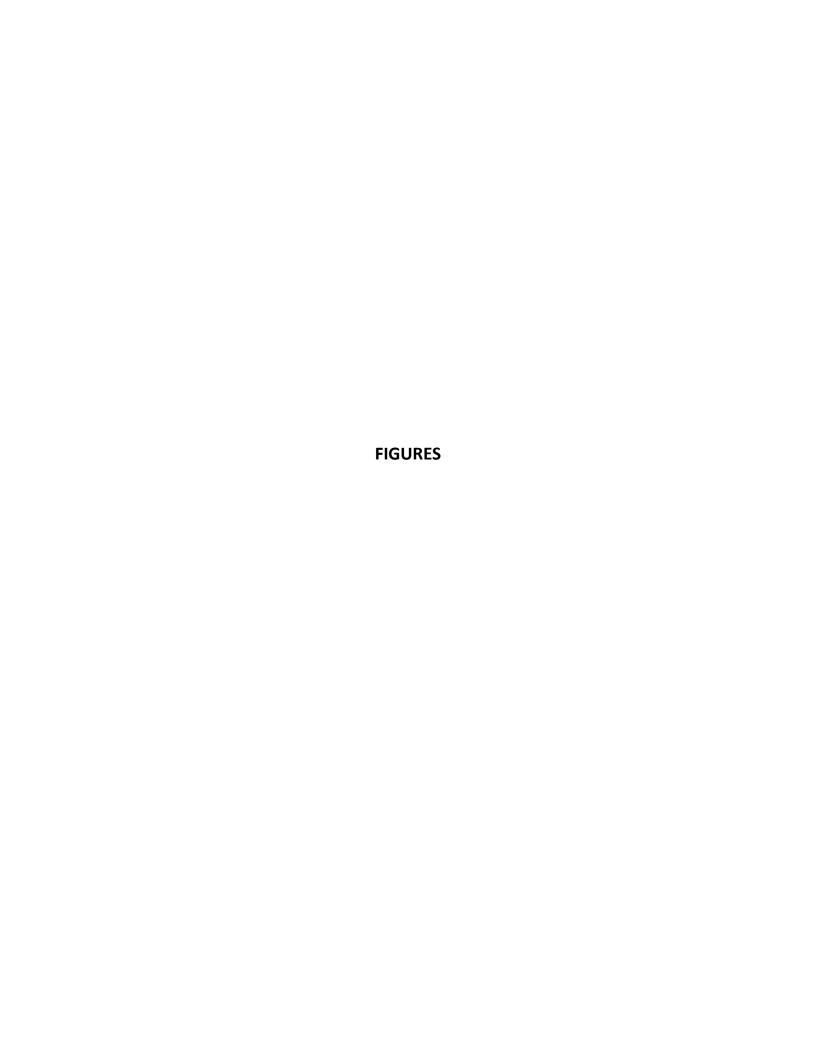
su = standard units

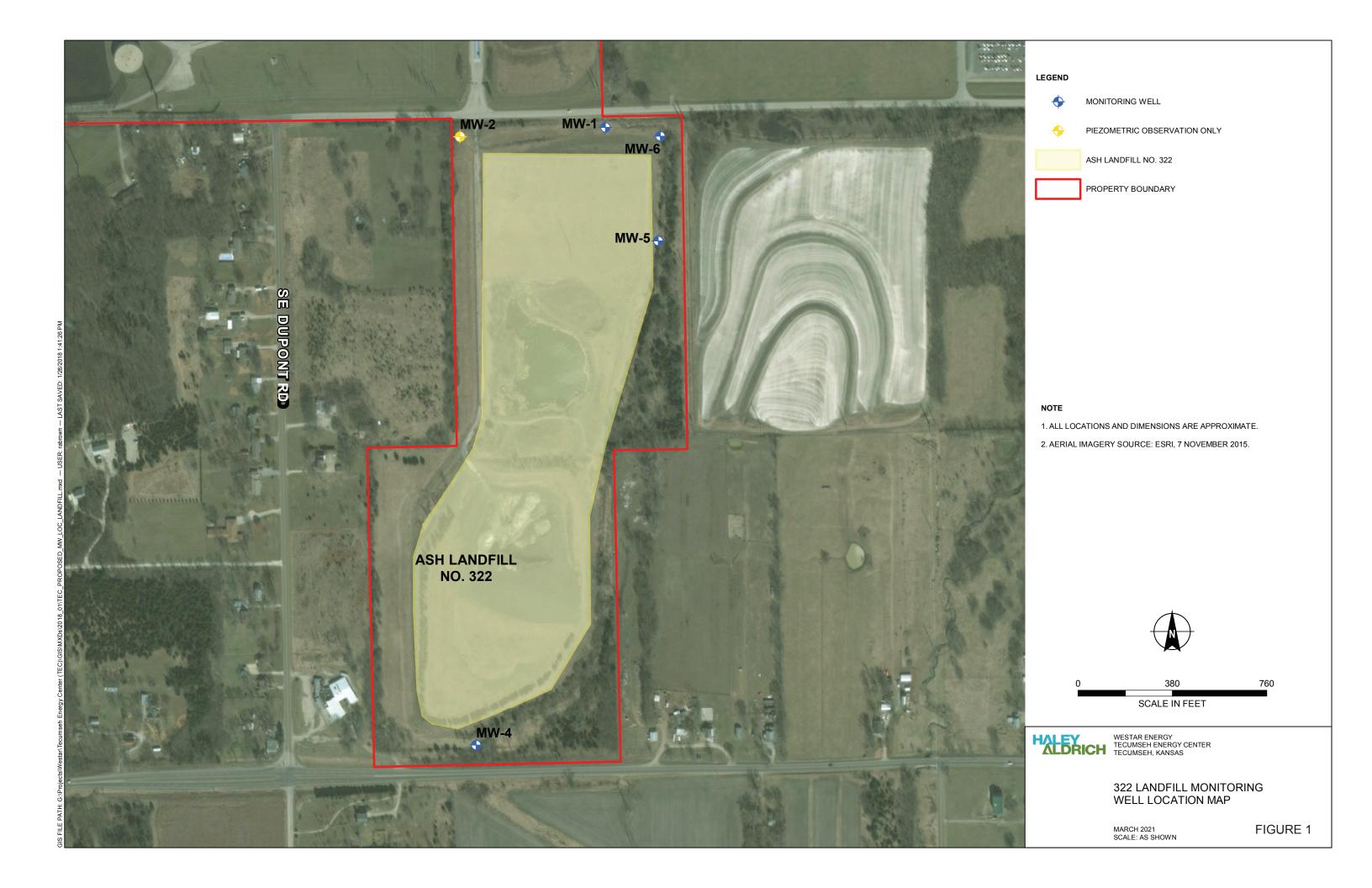
TDS = total dissolved solids

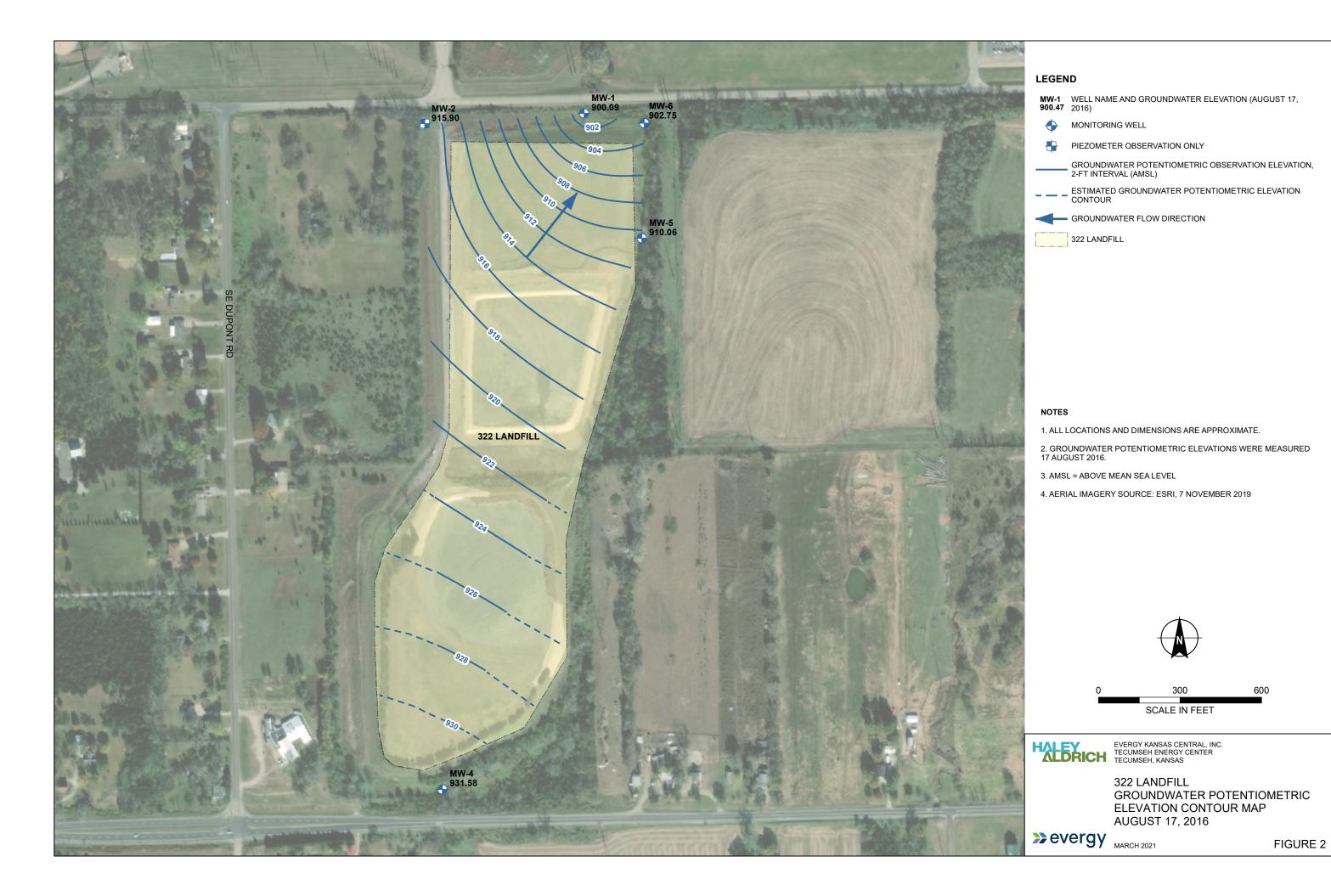
TOC = top of casing

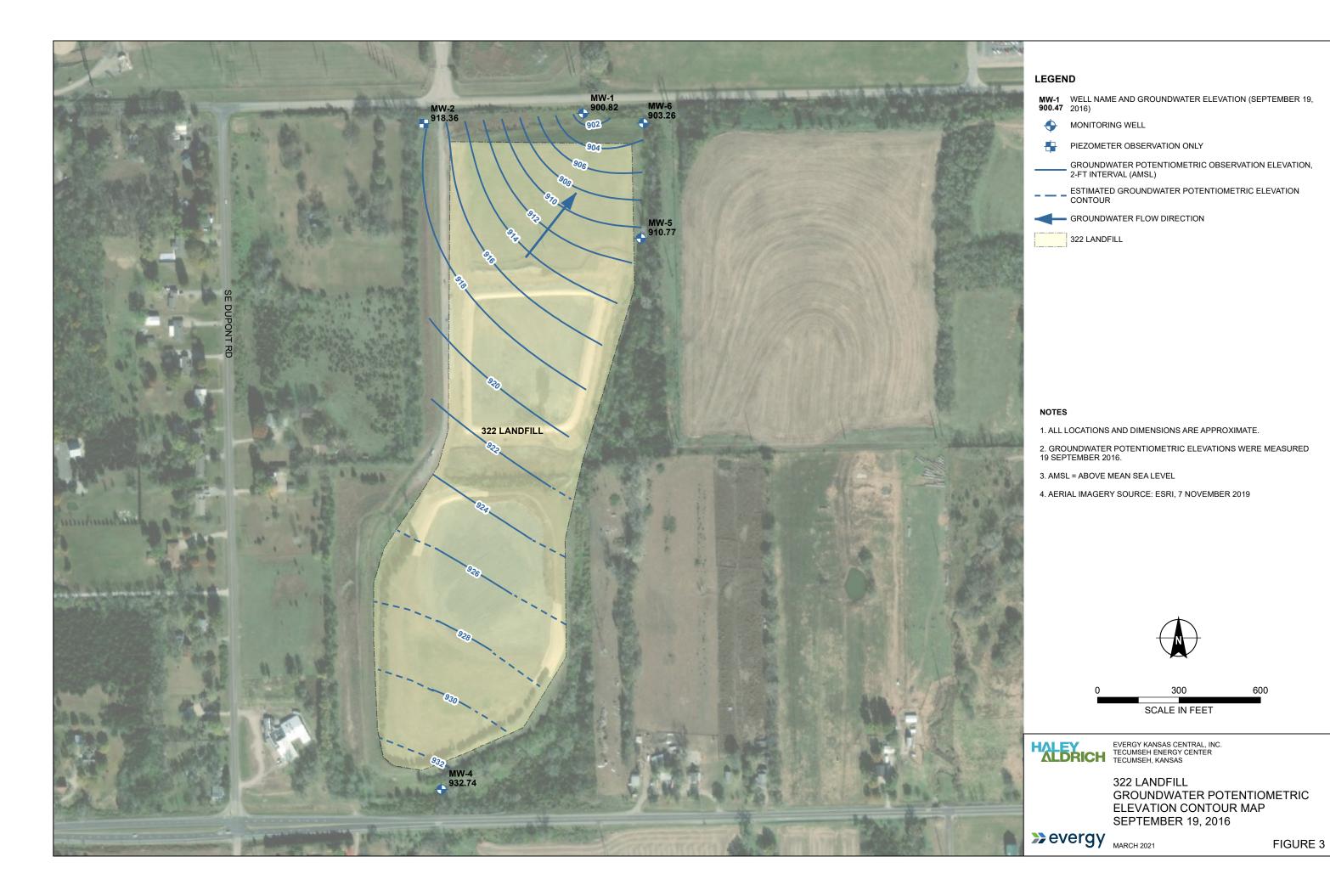
USEPA = United States Environmental Protection Agency

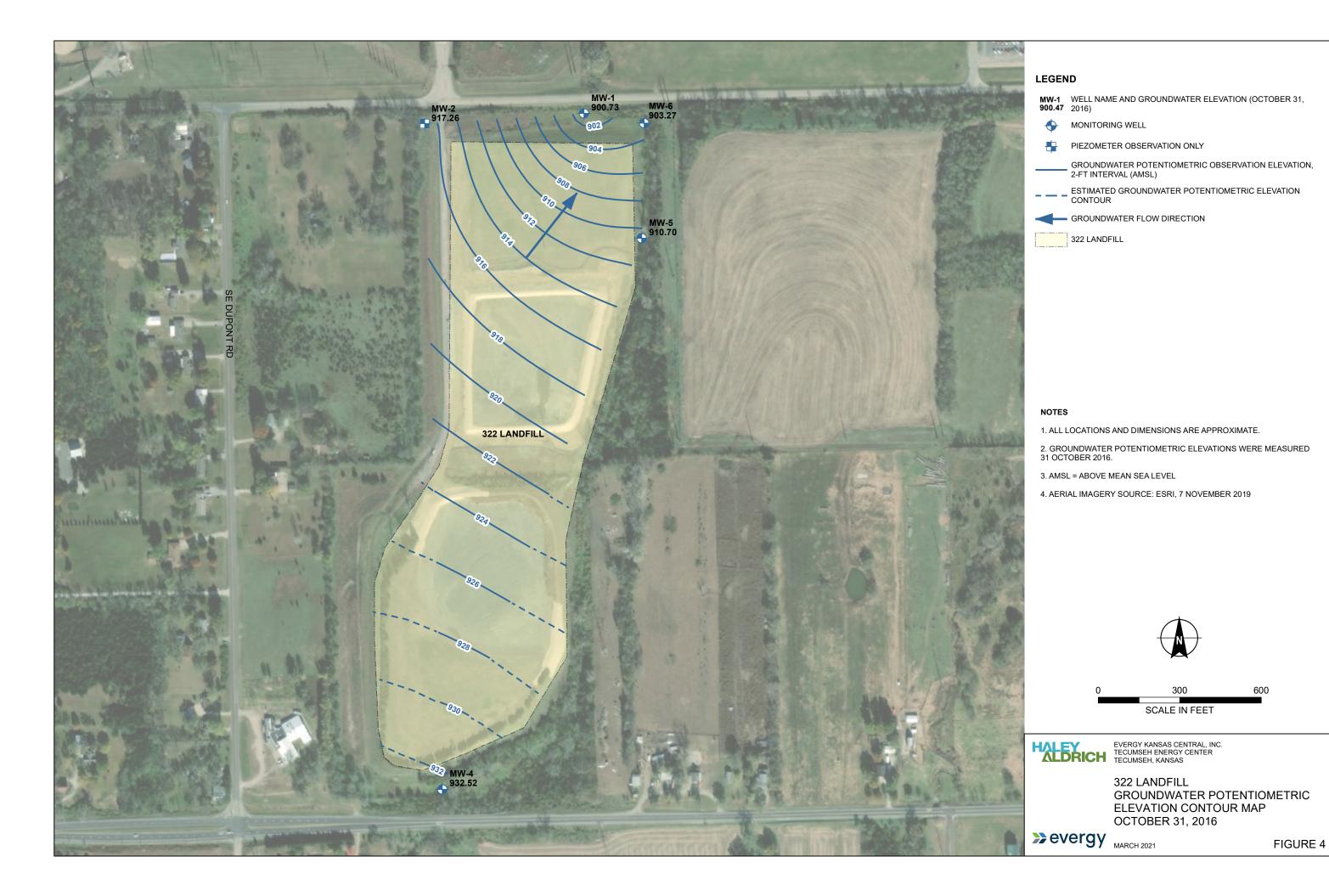


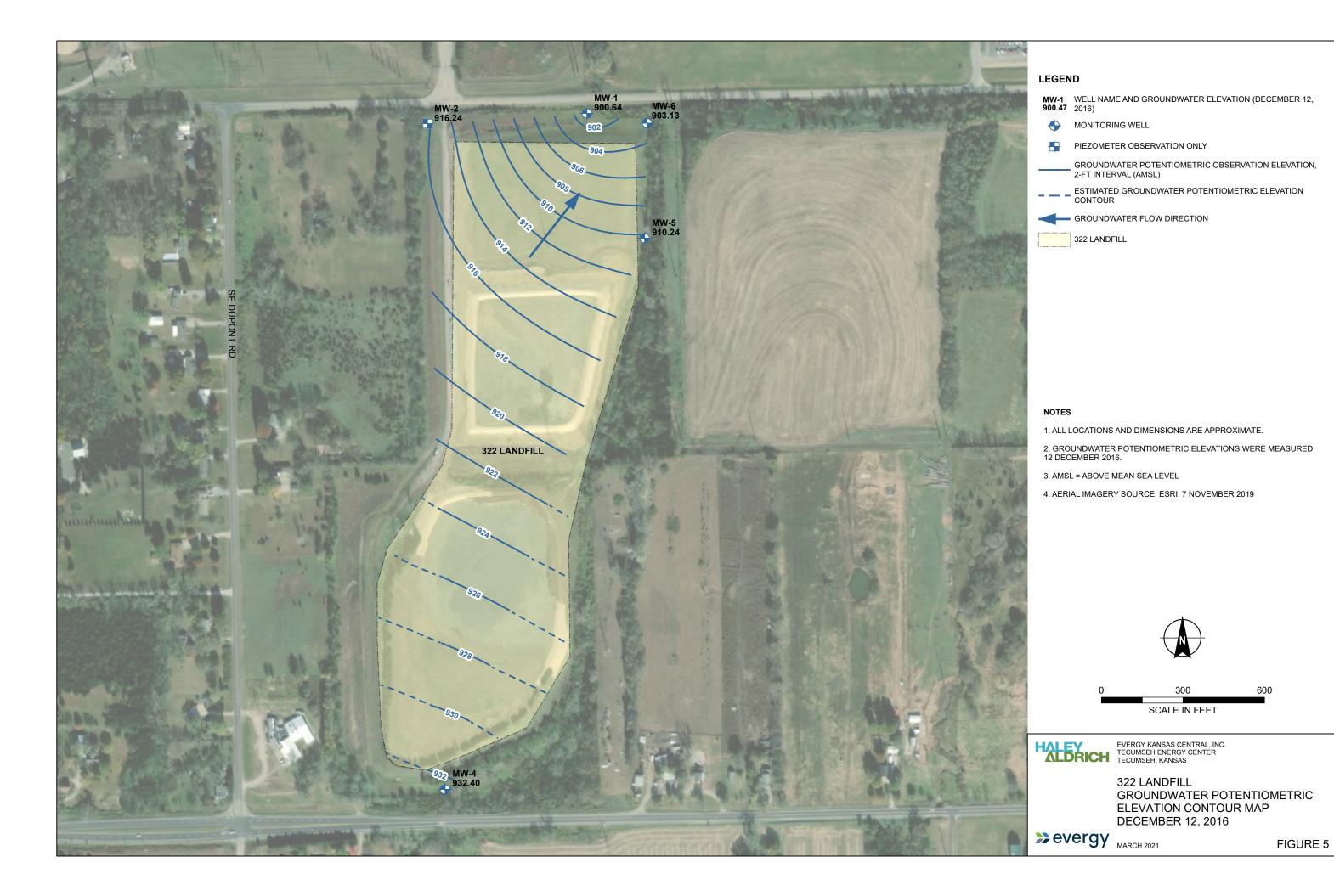


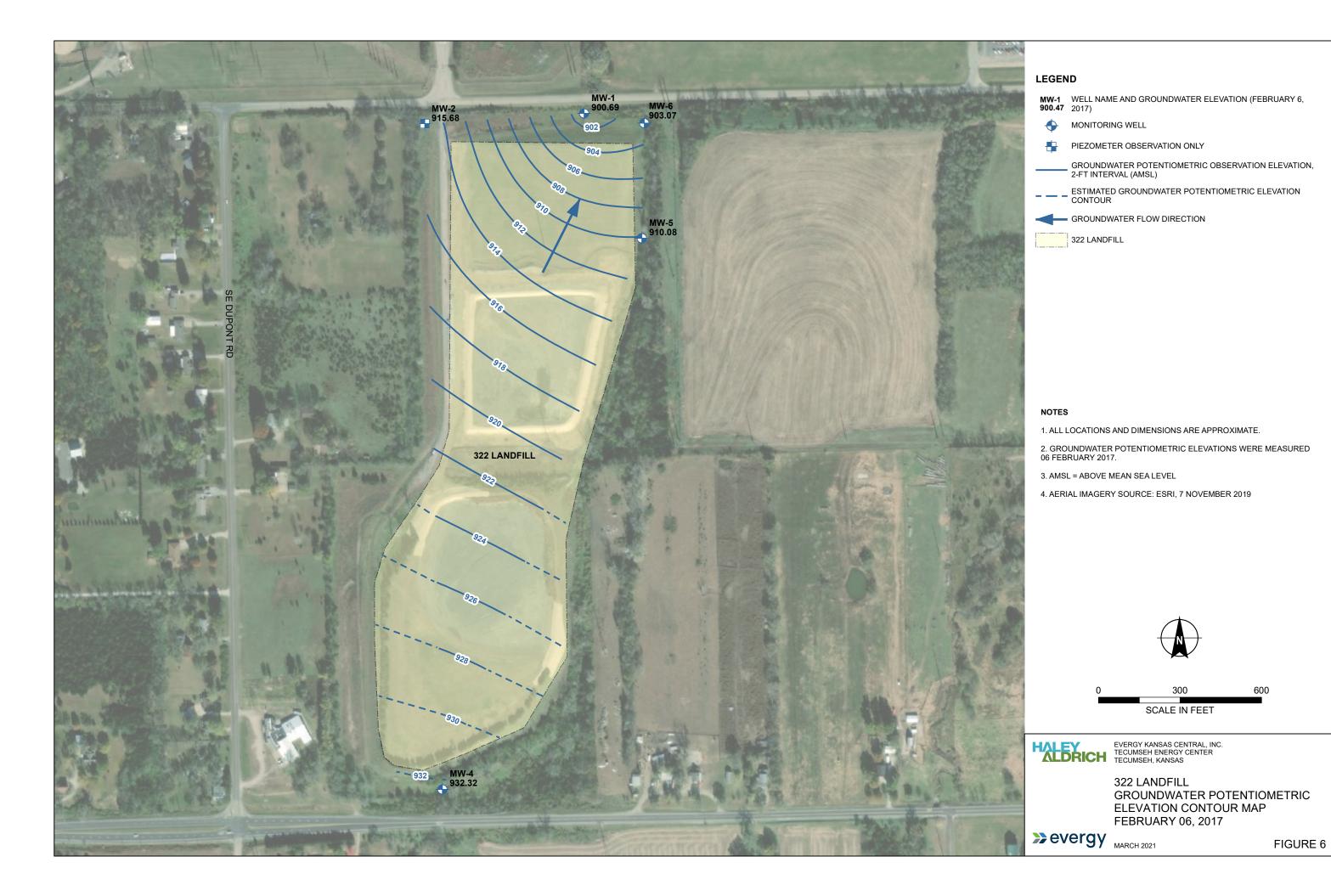


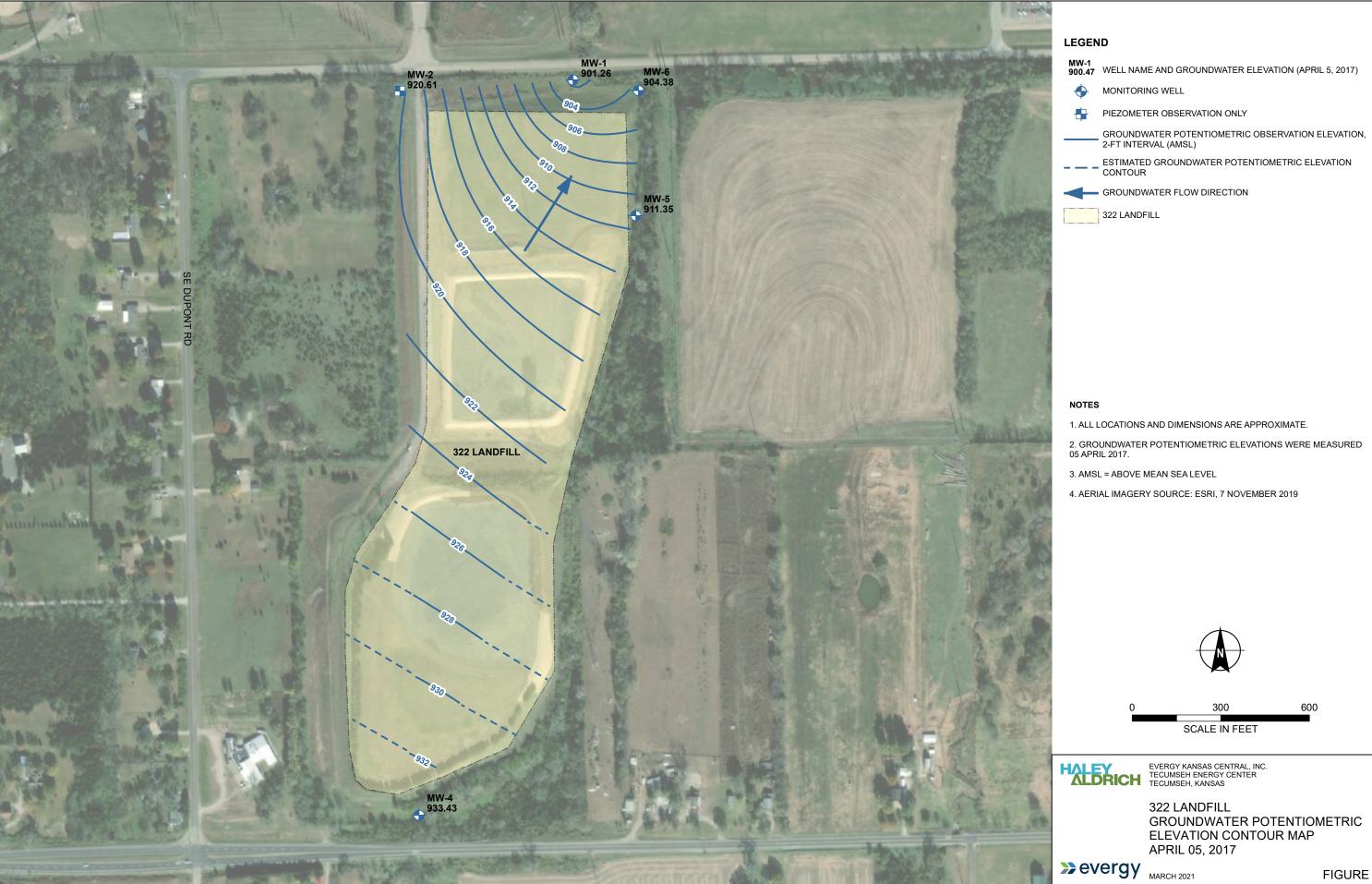






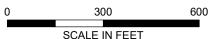








- 2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED



GROUNDWATER POTENTIOMETRIC **ELEVATION CONTOUR MAP** 

FIGURE 7

