

2020 ANNUAL GROUNDWATER MONITORING  
AND CORRECTIVE ACTION REPORT  
847 LANDFILL  
LAWRENCE ENERGY CENTER  
LAWRENCE, KANSAS

by Haley & Aldrich, Inc.  
Cleveland, Ohio

for Evergy Kansas Central, Inc.  
Topeka, Kansas

File No. 129778-041  
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Revision No.	Date	Notes
0	2/1/2021	Original
1	4/16/2021	Revised to include groundwater potentiometric elevation contour maps for 2020

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

This Annual Groundwater Monitoring and Corrective Action Report documents the groundwater monitoring program for the Lawrence Energy Center (LEC) 847 Landfill consistent with applicable sections of 257.90 through 257.98, and describes activities conducted in the prior calendar year (2020) and documents compliance with the U.S. Environmental Protection Agency Coal Combustion Residual Rule. I certify that the 2020 Annual Groundwater Monitoring and Corrective Action Report for the LEC 847 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.



Mark  
Nicholls

Digitally signed by  
Mark Nicholls  
Date: 2021.04.16  
14:10:49 -07'00'

## 1. Introduction

This 2020 Annual Groundwater Monitoring and Corrective Action Report (Annual Report) addresses the 847 Landfill (also known as Ash Landfill 847) at the Lawrence Energy Center (LEC), operated by Evergy Kansas Central, Inc. (Evergy). This Annual Report was developed in accordance with the U.S. Environmental Protection Agency Coal Combustion Residual (CCR) Rule (Rule) effective October 19, 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 847 Landfill consistent with applicable sections of 257.90 through 257.98, and describes activities conducted in the prior calendar year (2020) and documents compliance with the Rule. The specific requirements for the Annual Report listed in § 257.90(e) of the Rule are provided in Sections 1 and 2 of this Annual Report and are in bold italic font, followed by a short narrative describing how each Rule requirement has been met.

### 1.1 40 CFR § 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 40 CFR § 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 847 Landfill was operating under a detection monitoring program in compliance with 40 CFR § 257.94.

#### 1.1.2 40 CFR § 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 847 Landfill was operating under a detection monitoring program in compliance with 40 CFR § 257.94.

#### 1.1.3 40 CFR § 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):*

2020 Annual Groundwater Monitoring  
and Corrective Action Report

1.1.3.1 40 CFR § 257.90(e)(6)(iii)(a)

**Identify those constituents listed in appendix III to this part and the names of the monitoring wells associated with such an increase; and**

No statistically significant increases (SSI) over background were identified during the previous calendar year (2020).

1.1.3.2 40 CFR § 257.90(e)(6)(iii)(b)

**Provide the date when the assessment monitoring program was initiated for the CCR unit.**

No SSIs over background were identified during the previous calendar year (2020); therefore, an assessment monitoring program was not initiated for the 847 Landfill in 2020.

1.1.4 40 CFR § 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:**

1.1.4.1 40 CFR § 257.90(e)(6)(iv)(A) – Statistically Significant Level Constituents

**Identify those constituents listed in appendix IV to this part and the names of the monitoring wells associated with such an increase;**

The 847 Landfill remains in detection monitoring, and no appendix IV constituents were collected or analyzed in 2020. Therefore, no statistically significant levels above the groundwater protection standard were identified for the 847 Landfill.

1.1.4.2 40 CFR § 257.90(e)(6)(iv)(B) – Initiation of the Assessment of Corrective Measures

**Provide the date when the assessment of corrective measures was initiated for the CCR unit;**

No assessment of corrective measures was required to be initiated in 2020 for this unit. The 847 Landfill remained in detection monitoring during 2020.

1.1.4.3 40 CFR § 257.90(e)(6)(iv)(C) – Assessment of Corrective Measures Public Meeting

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

An assessment of corrective measures was not required for the 847 Landfill in 2020; therefore, a public meeting was not held.

1.1.4.4 40 CFR § 257.90(e)(6)(iv)(D) – Completion of the Assessment of Corrective Measures

**Provide the date when the assessment of corrective measures was completed for the CCR unit.**

No assessment of corrective measures was required to be initiated in 2020 for this unit. The 847 Landfill remained in detection monitoring during 2020.

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

**1.1.5 40 CFR § 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***

The 847 Landfill remains in detection monitoring, and no remedy was required to be selected.

**1.1.6 40 CFR § 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.***

No remedial activities were required in 2020.

## 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 LEC 847 Landfill. The 847 Landfill 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 LEC 847 Landfill as required by the Rule. Groundwater sampling and analysis was conducted in accordance with 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 applicable groundwater-related activities completed in the calendar year 2020.

#### 2.2.1 Status of the Groundwater Monitoring Program

The 847 Landfill remained in the detection monitoring program during 2020.

#### 2.2.2 Key Actions Completed

The 2019 Annual Groundwater Monitoring and Corrective Action Report was completed in January 2020. Statistical evaluation was completed in January 2020 on analytical data from the September 2019 semi-annual detection monitoring sampling event. Semi-annual detection



## 2020 Annual Groundwater Monitoring and Corrective Action Report

monitoring events were completed in March and September 2020. Statistical evaluation was completed in July 2020 on analytical data from the March 2020 detection monitoring sampling event. Statistical evaluation of the results from the September 2020 semi-annual detection monitoring sampling event are due to be completed in January 2021 and will be reported in the next annual report.

### 2.2.3 Problems Encountered

One problem encountered during groundwater monitoring activities in 2020 consisted of laboratory analytical errors that required the laboratory to reanalyze select analytical results. Chloride results were reanalyzed for MW-35 and MW-31R for the September 2020 semi-annual detection monitoring sampling event due to elevated laboratory reporting limits related to an elevated dilution factor. This was the only issue that needed to be addressed at the 847 Landfill in 2020.

### 2.2.4 Actions to Resolve Problems

The resolution to problems encountered in 2020 included additional laboratory analyses as described above. The analytical results were revised accordingly. No other problems were encountered at the 847 Landfill in 2020; therefore, no actions to resolve problems were required.

### 2.2.5 Project Key Activities for Upcoming Year

Key activities planned for 2021 include completion of the 2020 Annual Groundwater Monitoring and Corrective Action Report, statistical evaluation of semi-annual detection monitoring analytical data collected in September 2020, and semi-annual detection monitoring and subsequent statistical evaluations.

## 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 847 Landfill 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 2020.

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

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

In accordance with § 257.94(b), two independent detection monitoring samples from each background and downgradient monitoring well were collected during 2020. A summary including the sample names, dates of sample collection, field parameters, and monitoring data obtained for the groundwater monitoring program for the 847 Landfill is presented in Table I of this report. Groundwater potentiometric elevation contour maps associated with each groundwater monitoring sampling event in 2020 are provided in Figures 2 and 3.

**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***

There was no transition between monitoring programs in 2020. Only detection monitoring was conducted in 2020.

**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 257.94 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 the activities completed in calendar year 2020.

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

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

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

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

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

No alternate source demonstration or certification was required in 2020; therefore, no 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).***

The 847 Landfill remains in detection monitoring and 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).***

The 847 Landfill remains in detection monitoring, and no assessment monitoring samples were collected or analyzed in 2020. Consequently, Evergy is not required to establish groundwater protection standards for this CCR unit, and this criterion is not applicable.

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

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

No assessment monitoring alternate source demonstration or certification was required in 2020. The 847 Landfill remained in detection monitoring during 2020.

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

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

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

## TABLE

**TABLE I**  
**SUMMARY OF ANALYTICAL RESULTS -2020 DETECTION MONITORING**

EVERGY KANSAS CENTRAL, INC.  
LAWRENCE ENERGY CENTER  
847 LANDFILL  
LAWRENCE, KANSAS

Location	Upgradient				Downgradient							
	MW-32		MW-35		MW-31R			MW-33			MW-34	
Measure Point (TOC)	861.96		862.52		857.67			855.44			871.96	
Sample Name	MW-32-031020	MW-32-091520	MW-35-031020	MW-35-091520	MW-31R-031020	MW-31R-091520	DUP-LF-091520	MW-33-031020	DUP-031020	MW-33-091520	MW-34-031020	MW-34-091520
Sample Date	03/10/2020	9/15/2020	03/10/2020	9/15/2020	03/10/2020	9/15/2020	9/15/2020	03/10/2020	03/10/2020	9/15/2020	03/10/2020	9/15/2020
Final Lab Report Date	3/19/2020	9/25/2020	3/19/2020	9/25/2020	3/19/2020	9/25/2020	9/25/2020	3/19/2020	3/19/2020	9/25/2020	3/19/2020	9/25/2020
Final Lab Report Revision Date	N/A	9/28/2020	N/A	9/28/2020	N/A	9/28/2020	9/28/2020	N/A	N/A	9/28/2020	N/A	9/28/2020
Final Radiation Lab Report 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
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	4/18/2020	10/23/2020	4/18/2020	10/23/2020	4/18/2020	10/23/2020	10/23/2020	4/18/2020	4/18/2020	10/23/2020	4/18/2020	10/23/2020
Depth to Water (ft btoc)	44.35	45.00	46.67	47.31	40.43	41.30	-	38.11	-	38.92	54.44	55.27
Temperature (Deg C)	9.64	16.09	10.29	15.80	8.95	16.36	-	8.83	-	16.95	8.14	16.57
Conductivity, Field (µS/cm)	731	885	30870	36500	9306	11800	-	16670	-	19700	15180	17800
Turbidity, Field (NTU)	0.52	0.0	0.44	0.0	0.43	0.0	-	0.85	-	0.0	0.65	0.0
Boron, Total (mg/L)	<b>0.18</b>	<b>0.19</b>	<b>1.87</b>	<b>2.0</b>	<b>0.719</b>	<b>0.75</b>	<b>0.76</b>	<b>1.56</b>	<b>1.58</b>	<b>1.6</b>	<b>2.08</b>	<b>2.2</b>
Calcium, Total (mg/L)	<b>59.4</b>	<b>60.4</b>	<b>518</b>	<b>525</b>	<b>264</b>	<b>253</b>	<b>256</b>	<b>252</b>	<b>255</b>	<b>246</b>	<b>210</b>	<b>203</b>
Chloride (mg/L)	<b>101</b>	<b>93.7</b>	<b>16200</b>	<b>14900</b>	<b>4150</b>	<b>4840</b>	<b>5830</b>	<b>6580</b>	<b>6650</b>	<b>6960</b>	<b>5800</b>	<b>6340</b>
Fluoride (mg/L)	<b>0.27</b>	<b>0.38</b>	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	<b>0.36</b>	< 0.20
Sulfate (mg/L)	<b>5.9</b>	<b>6.0</b>	<b>666</b>	<b>615</b>	<b>187</b>	<b>187</b>	<b>198</b>	<b>316</b>	<b>338</b>	<b>277</b>	<b>535</b>	<b>449</b>
pH (lab) (su)	<b>7.6</b>	<b>7.6</b>	<b>7.4</b>	<b>7.2</b>	<b>7.4</b>	<b>7.2</b>	<b>7.2</b>	<b>7.8</b>	<b>7.7</b>	<b>7.4</b>	<b>7.4</b>	<b>7.6</b>
TDS (mg/L)	<b>498</b>	<b>517</b>	<b>24900</b>	<b>25200</b>	<b>8050</b>	<b>8420</b>	<b>8520</b>	<b>13600</b>	<b>12800</b>	<b>12900</b>	<b>11300</b>	<b>11400</b>

**Notes and Abbreviations:**

**Bold value:** Detection above laboratory reporting limit.

Data presented in this table were verified against the laboratory and validation reports.

µS/cm = micro Siemens per centimeter

Deg C = degrees Celsius

ft btoc = feet below top of casing

mg/L = milligrams per liter

N/A = Not Applicable

NTU = Nephelometric Turbidity Unit

su = standard unit





TDS = total dissolved solids

TOC = top of casing

## FIGURES



**LEGEND**

-  MONITORING WELL
-  WATER QUALITY ONLY
-  FUTURE 847 LANDFILL DISPOSAL
-  847 LANDFILL AREA

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
4. AERIAL IMAGERY SOURCE: ESRI, APRIL 17, 2018






**HALEY ALDRICH** EVERGY KANSAS CENTRAL, INC.  
LAWRENCE ENERGY CENTER  
LAWRENCE, KANSAS




**847 LANDFILL MONITORING WELL LOCATION MAP**





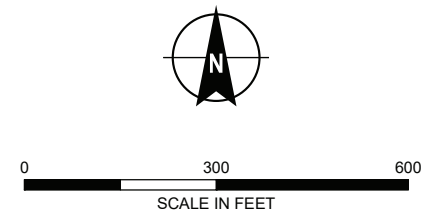
**LEGEND**

- MW-32** WELL NAME AND GROUNDWATER ELEVATION (MARCH 2020)
- 817.60**
-  MONITORING WELL
-  WATER QUALITY ONLY
-  GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION, 0.25-FT INTERVAL (AMSL)

-  SITE GROUNDWATER FLOW DIRECTION
-  847 LANDFILL
-  FUTURE 847 LANDFILL DISPOSAL

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 10 MARCH 2020.
3. MW-35 WAS NOT INCLUDED IN THE DATA SET TO CREATE GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION LINES.
4. AMSL = ABOVE MEAN SEA LEVEL
5. AERIAL IMAGERY SOURCE: ESRI, 17 APRIL 2018



**HALEY ALDRICH**

EVERGY KANSAS CENTRAL, INC.  
LAWRENCE ENERGY CENTER  
LAWRENCE, KANSAS

**847 LANDFILL**  
GROUNDWATER POTENTIOMETRIC  
ELEVATION CONTOUR MAP  
MARCH 10, 2020

**evergy**

APRIL 2021

FIGURE 2



**LEGEND**

**MW-32** WELL NAME AND GROUNDWATER ELEVATION (SEPTEMBER 2020)

MONITORING WELL

WATER QUALITY ONLY

GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION, 0.25-FT INTERVAL (AMSL)

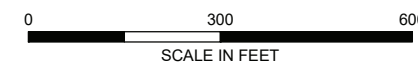
SITE GROUNDWATER FLOW DIRECTION

847 LANDFILL

FUTURE 847 LANDFILL DISPOSAL

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 14 SEPTEMBER 2020.
3. MW-35 WAS NOT INCLUDED IN THE DATA SET TO CREATE GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION LINES.
4. AMSL = ABOVE MEAN SEA LEVEL
5. AERIAL IMAGERY SOURCE: ESRI, 17 APRIL 2018



**HALEY ALDRICH**

EVERGY KANSAS CENTRAL, INC.  
LAWRENCE ENERGY CENTER  
LAWRENCE, KANSAS

**847 LANDFILL**  
GROUNDWATER POTENTIOMETRIC  
ELEVATION CONTOUR MAP  
SEPTEMBER 14, 2020

**evergy**

APRIL 2021

FIGURE 3

October 7, 2022  
Project No. 0204993-000



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: 2020 Annual Groundwater Monitoring and Corrective Action Report Addendum  
Evergy Kansas Central, Inc.  
847 Landfill  
Lawrence Energy Center – Lawrence, Kansas

The Evergy Kansas Central, Inc. (Evergy) 847 Landfill at the Lawrence Energy Center 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 2020 for the 847 Landfill was completed and placed in the facility's operating record on January 31, 2021, 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 2020 sampling events are included in Attachment 1, and a discussion of the applicable statistical analyses completed in 2020 are included in Attachment 2 of this addendum. For each of the 2020 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 as follows providing the additional information:

- 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 and September 2020 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 2020. Statistical analyses completed in 2020 included:
  - Overview of the January 2020 statistical analysis for data obtained in the September 2019 sampling event; and
  - Overview of the July 2020 statistical analysis for data obtained in the March 2020 sampling event.
- Attachment 3 – 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 and September 2020 are provided.

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

**ATTACHMENT 1-1**  
**March 2020 Sampling Event**  
**Laboratory Analytical Report**

March 19, 2020

Melissa Michels  
Evergy, Inc.  
818 Kansas Avenue  
Topeka, KS 66612

RE: Project: LEC 847 LANDFILL CCR  
Pace Project No.: 60331438

Dear Melissa Michels:

Enclosed are the analytical results for sample(s) received by the laboratory on March 11, 2020. 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,



Jasmine Amerin  
jasmine.amerin@pacelabs.com  
(913)599-5665  
Project Manager

Enclosures

cc: Bob Beck, Evergy  
Andrew Hare, Evergy, Inc.  
Laura Hines, Evergy, Inc.  
Jake Humphrey, Evergy, Inc.  
Tabitha Hylton, KCP&L & Westar, Evergy Companies  
Samantha Kaney, Haley & Aldrich  
Jared Morrison, Evergy, Inc.  
Melanie Satanek, Haley & Aldrich, Inc.  
Danielle Zinmaster, Haley & Aldrich



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

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### **Pace Analytical Services Kansas**

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 #: KS000212020-2

Oklahoma Certification #: 9205/9935

Florida: Cert E871149 SEKS WET

Texas Certification #: T104704407-19-12

Utah Certification #: KS000212018-8

Illinois Certification #: 004592

Kansas Field Laboratory Accreditation: # E-92587

Missouri SEKS Micro Certification: 10070

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## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60331438001	MW-34-031020	Water	03/10/20 09:40	03/11/20 14:20
60331438002	MW-33-031020	Water	03/10/20 10:45	03/11/20 14:20
60331438003	DUP-031020	Water	03/10/20 10:55	03/11/20 14:20
60331438004	MW-31R-031020	Water	03/10/20 12:05	03/11/20 14:20
60331438005	MW-32-031020	Water	03/10/20 13:00	03/11/20 14:20
60331438006	MW-35-031020	Water	03/10/20 13:50	03/11/20 14:20

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### SAMPLE ANALYTE COUNT

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60331438001	MW-34-031020	EPA 200.7	JDE	2	PASI-K
		SM 2540C	AJS	1	PASI-K
		SM 4500-H+B	MGS	1	PASI-K
		EPA 300.0	BLA	3	PASI-K
60331438002	MW-33-031020	EPA 200.7	JDE	2	PASI-K
		SM 2540C	AJS	1	PASI-K
		SM 4500-H+B	MGS	1	PASI-K
		EPA 300.0	BLA, CNB	3	PASI-K
60331438003	DUP-031020	EPA 200.7	JDE	2	PASI-K
		SM 2540C	AJS	1	PASI-K
		SM 4500-H+B	MGS	1	PASI-K
		EPA 300.0	BLA	3	PASI-K
60331438004	MW-31R-031020	EPA 200.7	JDE	2	PASI-K
		SM 2540C	AJS	1	PASI-K
		SM 4500-H+B	MGS	1	PASI-K
		EPA 300.0	BLA	3	PASI-K
60331438005	MW-32-031020	EPA 200.7	JDE	2	PASI-K
		SM 2540C	AJS	1	PASI-K
		SM 4500-H+B	MGS	1	PASI-K
		EPA 300.0	BLA, CNB	3	PASI-K
60331438006	MW-35-031020	EPA 200.7	JDE	2	PASI-K
		SM 2540C	AJS	1	PASI-K
		SM 4500-H+B	MGS	1	PASI-K
		EPA 300.0	BLA, CNB	3	PASI-K

### REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

<b>Sample: MW-34-031020</b>		<b>Lab ID: 60331438001</b>		Collected: 03/10/20 09:40	Received: 03/11/20 14:20	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						
Boron, Total Recoverable	<b>2080</b>	ug/L	100	1	03/17/20 15:59	03/18/20 15:11	7440-42-8	
Calcium, Total Recoverable	<b>210000</b>	ug/L	200	1	03/17/20 15:59	03/18/20 15:11	7440-70-2	
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C						
Total Dissolved Solids	<b>11300</b>	mg/L	333	1		03/12/20 14:44		
<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		03/17/20 16:14		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0						
Chloride	<b>5800</b>	mg/L	1000	1000		03/13/20 16:04	16887-00-6	
Fluoride	<b>0.36</b>	mg/L	0.20	1		03/12/20 23:29	16984-48-8	
Sulfate	<b>535</b>	mg/L	50.0	50		03/12/20 23:59	14808-79-8	

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>Sample: MW-33-031020      Lab ID: 60331438002      Collected: 03/10/20 10:45      Received: 03/11/20 14:20      Matrix: Water</b>								
<b>200.7 Metals, Total</b> Analytical Method: EPA 200.7      Preparation Method: EPA 200.7								
Boron, Total Recoverable	<b>1560</b>	ug/L	100	1	03/17/20 15:59	03/18/20 15:14	7440-42-8	
Calcium, Total Recoverable	<b>252000</b>	ug/L	200	1	03/17/20 15:59	03/18/20 15:14	7440-70-2	
<b>2540C Total Dissolved Solids</b> Analytical Method: SM 2540C								
Total Dissolved Solids	<b>13600</b>	mg/L	500	1		03/12/20 14:45		
<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		03/18/20 14:08		H6
<b>300.0 IC Anions 28 Days</b> Analytical Method: EPA 300.0								
Chloride	<b>6580</b>	mg/L	1000	1000		03/13/20 16:20	16887-00-6	
Fluoride	<b>&lt;0.20</b>	mg/L	0.20	1		03/13/20 01:12	16984-48-8	
Sulfate	<b>316</b>	mg/L	50.0	50		03/13/20 00:13	14808-79-8	

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>Sample: DUP-031020</b>								
<b>Lab ID: 60331438003</b>								
Collected: 03/10/20 10:55 Received: 03/11/20 14:20 Matrix: Water								
<b>200.7 Metals, Total</b> Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Boron, Total Recoverable	<b>1580</b>	ug/L	100	1	03/17/20 15:59	03/18/20 15:16	7440-42-8	
Calcium, Total Recoverable	<b>255000</b>	ug/L	200	1	03/17/20 15:59	03/18/20 15:16	7440-70-2	
<b>2540C Total Dissolved Solids</b> Analytical Method: SM 2540C								
Total Dissolved Solids	<b>12800</b>	mg/L	500	1		03/12/20 14:45		
<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		03/18/20 14:11		H6
<b>300.0 IC Anions 28 Days</b> Analytical Method: EPA 300.0								
Chloride	<b>6650</b>	mg/L	1000	1000		03/13/20 16:36	16887-00-6	
Fluoride	<b>&lt;0.20</b>	mg/L	0.20	1		03/13/20 01:26	16984-48-8	
Sulfate	<b>338</b>	mg/L	50.0	50		03/13/20 01:55	14808-79-8	

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>Sample: MW-31R-031020      Lab ID: 60331438004      Collected: 03/10/20 12:05      Received: 03/11/20 14:20      Matrix: Water</b>								
<b>200.7 Metals, Total</b> Analytical Method: EPA 200.7      Preparation Method: EPA 200.7								
Boron, Total Recoverable	<b>719</b>	ug/L	100	1	03/17/20 15:59	03/18/20 15:23	7440-42-8	
Calcium, Total Recoverable	<b>264000</b>	ug/L	1000	5	03/17/20 15:59	03/18/20 15:39	7440-70-2	
<b>2540C Total Dissolved Solids</b> Analytical Method: SM 2540C								
Total Dissolved Solids	<b>8050</b>	mg/L	250	1		03/12/20 14:45		
<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		03/18/20 14:15		H6
<b>300.0 IC Anions 28 Days</b> Analytical Method: EPA 300.0								
Chloride	<b>4150</b>	mg/L	1000	1000		03/13/20 16:52	16887-00-6	
Fluoride	<b>&lt;0.20</b>	mg/L	0.20	1		03/13/20 02:10	16984-48-8	
Sulfate	<b>187</b>	mg/L	10.0	10		03/13/20 02:25	14808-79-8	

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>Sample: MW-32-031020      Lab ID: 60331438005      Collected: 03/10/20 13:00      Received: 03/11/20 14:20      Matrix: Water</b>								
<b>200.7 Metals, Total</b> Analytical Method: EPA 200.7      Preparation Method: EPA 200.7								
Boron, Total Recoverable	<b>180</b>	ug/L	100	1	03/17/20 15:59	03/18/20 15:25	7440-42-8	
Calcium, Total Recoverable	<b>59400</b>	ug/L	200	1	03/17/20 15:59	03/18/20 15:25	7440-70-2	
<b>2540C Total Dissolved Solids</b> Analytical Method: SM 2540C								
Total Dissolved Solids	<b>498</b>	mg/L	10.0	1		03/12/20 14:45		
<b>4500H+ pH, Electrometric</b> Analytical Method: SM 4500-H+B								
pH at 25 Degrees C	<b>7.6</b>	Std. Units	0.10	1		03/18/20 14:17		H6
<b>300.0 IC Anions 28 Days</b> Analytical Method: EPA 300.0								
Chloride	<b>101</b>	mg/L	10.0	10		03/13/20 13:24	16887-00-6	
Fluoride	<b>0.27</b>	mg/L	0.20	1		03/12/20 10:20	16984-48-8	
Sulfate	<b>5.9</b>	mg/L	1.0	1		03/12/20 10:20	14808-79-8	

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>Sample: MW-35-031020</b>		<b>Lab ID: 60331438006</b>		Collected: 03/10/20 13:50	Received: 03/11/20 14:20	Matrix: Water		
<b>200.7 Metals, Total</b> Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Boron, Total Recoverable	<b>1870</b>	ug/L	1000	10	03/17/20 15:59	03/18/20 15:41	7440-42-8	
Calcium, Total Recoverable	<b>518000</b>	ug/L	200	1	03/17/20 15:59	03/18/20 15:27	7440-70-2	
<b>2540C Total Dissolved Solids</b> Analytical Method: SM 2540C								
Total Dissolved Solids	<b>24900</b>	mg/L	1000	1		03/12/20 14:45		
<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		03/18/20 14:20		H6
<b>300.0 IC Anions 28 Days</b> Analytical Method: EPA 300.0								
Chloride	<b>16200</b>	mg/L	5000	5000		03/13/20 14:37	16887-00-6	
Fluoride	<b>&lt;0.20</b>	mg/L	0.20	1		03/12/20 12:27	16984-48-8	
Sulfate	<b>666</b>	mg/L	50.0	50		03/12/20 12:58	14808-79-8	

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**QUALITY CONTROL DATA**

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

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QC Batch: 644386 Analysis Method: EPA 200.7  
 QC Batch Method: EPA 200.7 Analysis Description: 200.7 Metals, Total  
 Associated Lab Samples: 60331438001, 60331438002, 60331438003, 60331438004, 60331438005, 60331438006

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METHOD BLANK: 2618357 Matrix: Water  
 Associated Lab Samples: 60331438001, 60331438002, 60331438003, 60331438004, 60331438005, 60331438006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Boron	ug/L	<100	100	03/18/20 14:41	
Calcium	ug/L	<200	200	03/18/20 14:41	

LABORATORY CONTROL SAMPLE: 2618358

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Boron	ug/L	1000	960	96	85-115	
Calcium	ug/L	10000	10200	102	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2618359 2618360

Parameter	Units	60331435003 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Boron	ug/L	1770	1000	1000	2740	2700	98	94	70-130	2	20	
Calcium	ug/L	562000	10000	10000	576000	558000	138	-43	70-130	3	20 M1	

MATRIX SPIKE SAMPLE: 2618361

Parameter	Units	60331435007 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Boron	ug/L	4930	1000	5730	80	70-130	
Calcium	ug/L	464000	10000	462000	-20	70-130 M1	

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

QC Batch: 643527 Analysis Method: SM 2540C  
 QC Batch Method: SM 2540C Analysis Description: 2540C Total Dissolved Solids  
 Associated Lab Samples: 60331438001, 60331438002, 60331438003, 60331438004, 60331438005, 60331438006

METHOD BLANK: 2614869 Matrix: Water  
 Associated Lab Samples: 60331438001, 60331438002, 60331438003, 60331438004, 60331438005, 60331438006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	<5.0	5.0	03/12/20 14:44	

LABORATORY CONTROL SAMPLE: 2614870

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	1000	1020	102	80-120	

SAMPLE DUPLICATE: 2614871

Parameter	Units	60331300001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	2410	2490	3	10	

SAMPLE DUPLICATE: 2614872

Parameter	Units	60331438006 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	24900	25300	2	10	

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

QC Batch: 644231 Analysis Method: SM 4500-H+B

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

Associated Lab Samples: 60331438001

SAMPLE DUPLICATE: 2617910

Parameter	Units	60331147001 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	6.8	7.1	4	5	H6

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### REPORT OF LABORATORY ANALYSIS

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**QUALITY CONTROL DATA**

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

QC Batch: 644593 Analysis Method: SM 4500-H+B

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

Associated Lab Samples: 60331438002, 60331438003, 60331438004, 60331438005, 60331438006

SAMPLE DUPLICATE: 2619185

Parameter	Units	60331267002 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	6.9	7.2	4	5	H6

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**REPORT OF LABORATORY ANALYSIS**

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

QC Batch: 643357 Analysis Method: EPA 300.0  
 QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions  
 Associated Lab Samples: 60331438001, 60331438002, 60331438003, 60331438004

METHOD BLANK: 2614192 Matrix: Water  
 Associated Lab Samples: 60331438001, 60331438002, 60331438003, 60331438004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	03/12/20 07:28	
Fluoride	mg/L	<0.20	0.20	03/12/20 07:28	
Sulfate	mg/L	<1.0	1.0	03/12/20 07:28	

METHOD BLANK: 2615595 Matrix: Water  
 Associated Lab Samples: 60331438001, 60331438002, 60331438003, 60331438004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	03/13/20 12:54	
Fluoride	mg/L	<0.20	0.20	03/13/20 12:54	
Sulfate	mg/L	<1.0	1.0	03/13/20 12:54	

LABORATORY CONTROL SAMPLE: 2614193

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.7	93	90-110	
Fluoride	mg/L	2.5	2.4	95	90-110	
Sulfate	mg/L	5	5.1	101	90-110	

LABORATORY CONTROL SAMPLE: 2615596

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.6	93	90-110	
Fluoride	mg/L	2.5	2.6	105	90-110	
Sulfate	mg/L	5	5.1	102	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2614194 2614195

Parameter	Units	MS		MSD		MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		20145436001 Result	Spike Conc.	Spike Conc.	Conc.								
Chloride	mg/L	8.5	5	5	14.1	14.1	111	112	80-120	1	15		
Fluoride	mg/L	ND	2.5	2.5	2.9	3.0	110	112	80-120	2	15		
Sulfate	mg/L	3.1	5	5	8.8	9.0	114	116	80-120	1	15		

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 DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

MATRIX SPIKE SAMPLE:		2614196					
Parameter	Units	60331435001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	37.9	50	88.5	101	80-120	
Fluoride	mg/L	0.27	2.5	3.1	112	80-120	
Sulfate	mg/L	313	250	587	110	80-120	

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### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

QC Batch: 643359 Analysis Method: EPA 300.0  
 QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions  
 Associated Lab Samples: 60331438005, 60331438006

METHOD BLANK: 2614204 Matrix: Water

Associated Lab Samples: 60331438005, 60331438006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	03/12/20 07:32	
Fluoride	mg/L	<0.20	0.20	03/12/20 07:32	
Sulfate	mg/L	<1.0	1.0	03/12/20 07:32	

METHOD BLANK: 2615620 Matrix: Water

Associated Lab Samples: 60331438005, 60331438006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	03/13/20 12:55	
Fluoride	mg/L	<0.20	0.20	03/13/20 12:55	
Sulfate	mg/L	<1.0	1.0	03/13/20 12:55	

METHOD BLANK: 2617956 Matrix: Water

Associated Lab Samples: 60331438005, 60331438006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	03/16/20 20:38	
Fluoride	mg/L	<0.20	0.20	03/16/20 20:38	
Sulfate	mg/L	<1.0	1.0	03/16/20 20:38	

LABORATORY CONTROL SAMPLE: 2614205

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.6	92	90-110	
Fluoride	mg/L	2.5	2.4	96	90-110	
Sulfate	mg/L	5	5.2	103	90-110	

LABORATORY CONTROL SAMPLE: 2615621

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.8	96	90-110	
Fluoride	mg/L	2.5	2.4	97	90-110	
Sulfate	mg/L	5	5.0	101	90-110	

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### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

LABORATORY CONTROL SAMPLE: 2617957

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.6	93	90-110	
Fluoride	mg/L	2.5	2.4	97	90-110	
Sulfate	mg/L	5	4.8	97	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2614206 2614207

Parameter	Units	60331438005		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		Result	Conc.	Conc.	Result	Result	% Rec	% Rec					
Chloride	mg/L	101	50	50	154	154	107	106	80-120	0	15		
Fluoride	mg/L	0.27	2.5	2.5	2.9	2.9	105	106	80-120	1	15		
Sulfate	mg/L	5.9	5	5	11.4	11.5	111	112	80-120	0	15		

MATRIX SPIKE SAMPLE: 2614208

Parameter	Units	60331212008 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	14.5	5	19.9	109	80-120	
Fluoride	mg/L	0.28	2.5	2.6	95	80-120	
Sulfate	mg/L	45.2	5	50.5	106	80-120 E	

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### REPORT OF LABORATORY ANALYSIS

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## QUALIFIERS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

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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: LEC 847 LANDFILL CCR

Pace Project No.: 60331438

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60331438001	MW-34-031020	EPA 200.7	644386	EPA 200.7	644506
60331438002	MW-33-031020	EPA 200.7	644386	EPA 200.7	644506
60331438003	DUP-031020	EPA 200.7	644386	EPA 200.7	644506
60331438004	MW-31R-031020	EPA 200.7	644386	EPA 200.7	644506
60331438005	MW-32-031020	EPA 200.7	644386	EPA 200.7	644506
60331438006	MW-35-031020	EPA 200.7	644386	EPA 200.7	644506
60331438001	MW-34-031020	SM 2540C	643527		
60331438002	MW-33-031020	SM 2540C	643527		
60331438003	DUP-031020	SM 2540C	643527		
60331438004	MW-31R-031020	SM 2540C	643527		
60331438005	MW-32-031020	SM 2540C	643527		
60331438006	MW-35-031020	SM 2540C	643527		
60331438001	MW-34-031020	SM 4500-H+B	644231		
60331438002	MW-33-031020	SM 4500-H+B	644593		
60331438003	DUP-031020	SM 4500-H+B	644593		
60331438004	MW-31R-031020	SM 4500-H+B	644593		
60331438005	MW-32-031020	SM 4500-H+B	644593		
60331438006	MW-35-031020	SM 4500-H+B	644593		
60331438001	MW-34-031020	EPA 300.0	643357		
60331438002	MW-33-031020	EPA 300.0	643357		
60331438003	DUP-031020	EPA 300.0	643357		
60331438004	MW-31R-031020	EPA 300.0	643357		
60331438005	MW-32-031020	EPA 300.0	643359		
60331438006	MW-35-031020	EPA 300.0	643359		

## REPORT OF LABORATORY ANALYSIS

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Sample Condition Upon Receipt

WO#: 60331438
Barcode
60331438

Client Name: Evergy Kansas Central

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 [ ] Other [x] Ziploc

Thermometer Used: T-299 Type of Ice: Wet [x] Blue [ ] None [ ]

Cooler Temperature (°C): As-read 1.8 Corr. Factor +0.31 Corrected 2.8

Date and initials of person examining contents: 3.11.20 HS

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, Samples arrived, Short Hold Time, Rush Turn Around Time, Sufficient volume, Correct containers used, Pace containers used, Containers intact, Unpreserved soils, Filtered volume, Sample labels match, Samples contain multiple phases, Containers requiring pH preservation, Cyanide water sample checks, Trip Blank present, Headspace in VOA vials, Samples from USDA Regulated Area, Additional labels attached.

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.

**Section A**

Required Client Information:

**Section B**

Required Project Information:

**Section C**

Invoice Information:

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

Company: EVERGY KANSAS CENTRAL, INC.	Report To: Melissa Michels	Attention: Accounts Payable
Address: Lawrence Energy Center (LEC) 818 Kansas Ave, Topeka, KS 66612	Copy To: Jared Morrison, Jake Humphrey, Laura Hines Andrew Hare, Tabitha Hylton, Samantha Kaney	Company Name: EVERGY KANSAS CENTRAL, INC
Email To: melissa.michels@evergy.com	Purchase Order No.: 10LEC-0000018165	Address: SAME AS A
Phone: 785-575-8113 Fax:	Project Name: LEC 847 Landfill CCR	Pace Quote Reference: Pace Project Manager: Jasmine Amerin, 913-563-1403
Requested Due Date/TAT: 7 day	Project Number: 129778-038	Pace Profile #: 9655, 2

**REGULATORY AGENCY**

NPDES  GROUND WATER  DRINKING WATER  
 UST  RCRA  OTHER \_\_\_\_\_

Site Location: \_\_\_\_\_  
 STATE: KS

ITEM #	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)	COLLECTED				SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives							Analysis Test Y/N	Requested Analysis Filtered (Y/N)				Residual Chlorine (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		Other	200.7 Total Metals*	300: Cl, F, SO <sub>4</sub>	2540C TDS		4500 H+B
					DATE	TIME	DATE	TIME																
1	MW-34-031020		WT		03/10	940			3	X	X						X	X	X	X				
2	MW-33-031020					1045			1	X	X						X	X	X	X				
3	Dup-031020					1055			1	X	X						X	X	X	X				
4	MW-BIR-031020					1205			1	X	X						X	X	X	X				
5	MW-32-031020					1300			1	X	X						X	X	X	X				
6	MW-35-031020					1350			1	X	X						X	X	X	X				
7																								
8																								
9																								
10																								
11																								
12																								

60331438

Pace Project No./ Lab I.D.

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS					
200.7 Total Metals: B, Ca	Eli Fredrickson H&A	03/11	1415	E Brockett Pace	3/11/20	14:20	2.8	3.11	4.6	Y	N	Y
							13.2					

<b>SAMPLER NAME AND SIGNATURE</b>		Temp in °C	Repacked on ice (Y/N)	Custody Sealed Cooler (Y/N)	Samples Intact (Y/N)
PRINT Name of SAMPLER:	Eli Fredrickson				
SIGNATURE of SAMPLER:	<i>Eli Fredrickson</i>				
DATE Signed (MM/DD/YY):	03/11/20				

\*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.

**ATTACHMENT 1-2**  
**September 2020 Sampling Event**  
**Laboratory Analytical Report**

September 28, 2020

Melissa Michels  
Evergy, Inc.  
818 Kansas Avenue  
Topeka, KS 66612

RE: Project: LEC 847 LANDFILL CCR  
Pace Project No.: 60348431

Dear Melissa Michels:

Enclosed are the analytical results for sample(s) received by the laboratory on September 15, 2020. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Kansas City

Revised Report REV\_2

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

Sincerely,



Jasmine Amerin  
jasmine.amerin@pacelabs.com  
(913)599-5665  
Project Manager

Enclosures

cc: Andrew Hare, Evergy, Inc.  
Laura Hines, Evergy, Inc.  
Jake Humphrey, Evergy, Inc.  
Tabitha Hylton, KCP&L & Westar, Evergy Companies  
Samantha Kaney, Haley & Aldrich  
Jared Morrison, Evergy, Inc.  
Melanie Satanek, Haley & Aldrich, Inc.  
Danielle Zinmaster, Haley & Aldrich



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

---

### **Pace Analytical Services Kansas**

9608 Loiret Boulevard, Lenexa, KS 66219

Missouri Inorganic Drinking Water Certification #: 10090

Arkansas Drinking Water

Arkansas Certification #: 20-020-0

Arkansas Drinking Water

Illinois Certification #: 200030

Iowa Certification #: 118

Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055

Nevada Certification #: KS000212020-2

Oklahoma Certification #: 9205/9935

Florida: Cert E871149 SEKS WET

Texas Certification #: T104704407-19-12

Utah Certification #: KS000212019-9

Illinois Certification #: 004592

Kansas Field Laboratory Accreditation: # E-92587

Missouri SEKS Micro Certification: 10070

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## REPORT OF LABORATORY ANALYSIS

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## SAMPLE SUMMARY

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60348431001	MW-32-091520	Water	09/15/20 09:35	09/15/20 17:20
60348431002	MW-35-091520	Water	09/15/20 09:13	09/15/20 17:20
60348431003	MW-31R-091520	Water	09/15/20 10:50	09/15/20 17:20
60348431004	MW-33-091520	Water	09/15/20 09:30	09/15/20 17:20
60348431005	MW-34-091520	Water	09/15/20 10:15	09/15/20 17:20
60348431006	DUP-LF-091520	Water	09/15/20 17:00	09/15/20 17:20

## REPORT OF LABORATORY ANALYSIS

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### SAMPLE ANALYTE COUNT

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60348431001	MW-32-091520	EPA 200.7	JLH	7	PASI-K
		EPA 200.7	JLH	2	PASI-K
		SM 2320B	CRN2	2	PASI-K
		SM 2540C	MAP	1	PASI-K
		SM 4500-H+B	LDB	1	PASI-K
		EPA 300.0	LDB	3	PASI-K
60348431002	MW-35-091520	EPA 200.7	JLH	7	PASI-K
		EPA 200.7	JLH	2	PASI-K
		SM 2320B	CRN2	2	PASI-K
		SM 2540C	MAP	1	PASI-K
		SM 4500-H+B	LDB	1	PASI-K
		EPA 300.0	MJK	3	PASI-K
60348431003	MW-31R-091520	EPA 200.7	JLH	7	PASI-K
		EPA 200.7	JLH	2	PASI-K
		SM 2320B	CRN2	2	PASI-K
		SM 2540C	MAP	1	PASI-K
		SM 4500-H+B	LDB	1	PASI-K
		EPA 300.0	MJK	3	PASI-K
60348431004	MW-33-091520	EPA 200.7	JLH	7	PASI-K
		EPA 200.7	JLH	2	PASI-K
		SM 2320B	CRN2	2	PASI-K
		SM 2540C	MAP	1	PASI-K
		SM 4500-H+B	LDB	1	PASI-K
		EPA 300.0	LDB	3	PASI-K
60348431005	MW-34-091520	EPA 200.7	JLH	7	PASI-K
		EPA 200.7	JLH	2	PASI-K
		SM 2320B	CRN2	2	PASI-K
		SM 2540C	MAP	1	PASI-K
		SM 4500-H+B	LDB	1	PASI-K
		EPA 300.0	LDB	3	PASI-K
60348431006	DUP-LF-091520	EPA 200.7	JLH	7	PASI-K
		EPA 200.7	JLH	2	PASI-K
		SM 2320B	CRN2	2	PASI-K
		SM 2540C	MAP	1	PASI-K
		SM 4500-H+B	LDB	1	PASI-K
		EPA 300.0	LDB, MJK	3	PASI-K

### REPORT OF LABORATORY ANALYSIS

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### SAMPLE ANALYTE COUNT

Project: LEC 847 LANDFILL CCR  
Pace Project No.: 60348431

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Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
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PASI-K = Pace Analytical Services - Kansas City

### REPORT OF LABORATORY ANALYSIS

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## PROJECT NARRATIVE

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

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**Date:** September 28, 2020

9/25/20-Amended report revised to pull in metals data for sample 60348431-002 and to include chloride rerun results for samples 60348431-002 and 60348431-003.

9/28/20-Amended report revised to report the chloride results for samples 60348431-002 and 60348431-003 at a dilution rather than the 1x result and to include the updated chloride rerun result for sample 60348431-006.

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

Sample: MW-32-091520	Lab ID: 60348431001	Collected: 09/15/20 09:35	Received: 09/15/20 17:20	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 Pace Analytical Services - Kansas City						
Boron, Total Recoverable	0.19	mg/L	0.10	1	09/22/20 13:40	09/23/20 12:11	7440-42-8	
Calcium, Total Recoverable	60.4	mg/L	0.20	1	09/22/20 13:40	09/23/20 12:11	7440-70-2	
Iron, Total Recoverable	0.27	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:11	7439-89-6	
Magnesium, Total Recoverable	13.2	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:11	7439-95-4	
Manganese, Total Recoverable	0.014	mg/L	0.0050	1	09/22/20 13:40	09/23/20 12:11	7439-96-5	
Potassium, Total Recoverable	2.5	mg/L	0.50	1	09/22/20 13:40	09/23/20 12:11	7440-09-7	
Sodium, Total Recoverable	116	mg/L	0.50	1	09/22/20 13:40	09/23/20 12:11	7440-23-5	
<b>200.7 Metals, Dissolved</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City						
Iron, Dissolved	0.27	mg/L	0.050	1	09/18/20 08:15	09/19/20 17:19	7439-89-6	
Manganese, Dissolved	0.014	mg/L	0.0050	1	09/18/20 08:15	09/19/20 17:19	7439-96-5	
<b>2320B Alkalinity</b>		Analytical Method: SM 2320B Pace Analytical Services - Kansas City						
Alkalinity,Bicarbonate (CaCO3)	312	mg/L	20.0	1		09/18/20 12:02		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	20.0	1		09/18/20 12:02		
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	517	mg/L	10.0	1		09/17/20 12:58		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City						
pH at 25 Degrees C	7.6	Std. Units	0.10	1		09/19/20 11:20		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City						
Chloride	93.7	mg/L	20.0	20		09/17/20 17:02	16887-00-6	
Fluoride	0.38	mg/L	0.20	1		09/17/20 16:48	16984-48-8	
Sulfate	6.0	mg/L	1.0	1		09/17/20 16:48	14808-79-8	

## REPORT OF LABORATORY ANALYSIS

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

Sample: MW-35-091520	Lab ID: 60348431002	Collected: 09/15/20 09:13	Received: 09/15/20 17:20	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 Pace Analytical Services - Kansas City						
Boron, Total Recoverable	2.0	mg/L	0.10	1	09/22/20 13:40	09/23/20 12:14	7440-42-8	
Calcium, Total Recoverable	525	mg/L	0.20	1	09/22/20 13:40	09/23/20 12:14	7440-70-2	M1
Iron, Total Recoverable	3.4	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:14	7439-89-6	
Magnesium, Total Recoverable	277	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:14	7439-95-4	M1
Manganese, Total Recoverable	0.19	mg/L	0.0050	1	09/22/20 13:40	09/23/20 12:14	7439-96-5	
Potassium, Total Recoverable	37.7	mg/L	0.50	1	09/22/20 13:40	09/23/20 12:14	7440-09-7	M1
Sodium, Total Recoverable	7870	mg/L	10.0	20	09/22/20 13:40	09/23/20 13:18	7440-23-5	M1
<b>200.7 Metals, Dissolved</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City						
Iron, Dissolved	3.1	mg/L	0.050	1	09/18/20 08:15	09/19/20 17:22	7439-89-6	
Manganese, Dissolved	0.21	mg/L	0.0050	1	09/18/20 08:15	09/19/20 17:22	7439-96-5	
<b>2320B Alkalinity</b>		Analytical Method: SM 2320B Pace Analytical Services - Kansas City						
Alkalinity,Bicarbonate (CaCO3)	174	mg/L	20.0	1		09/18/20 12:13		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	20.0	1		09/18/20 12:13		
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	25200	mg/L	2000	1		09/17/20 12:58		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City						
pH at 25 Degrees C	7.2	Std. Units	0.10	1		09/19/20 11:16		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City						
Chloride	14900	mg/L	5000	5000		09/24/20 15:31	16887-00-6	
Fluoride	<0.20	mg/L	0.20	1		09/24/20 15:01	16984-48-8	
Sulfate	615	mg/L	100	100		09/24/20 15:16	14808-79-8	

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

Sample: MW-31R-091520	Lab ID: 60348431003	Collected: 09/15/20 10:50	Received: 09/15/20 17:20	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 Pace Analytical Services - Kansas City						
Boron, Total Recoverable	0.75	mg/L	0.10	1	09/22/20 13:40	09/23/20 12:22	7440-42-8	
Calcium, Total Recoverable	253	mg/L	0.20	1	09/22/20 13:40	09/23/20 12:22	7440-70-2	
Iron, Total Recoverable	2.4	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:22	7439-89-6	
Magnesium, Total Recoverable	87.6	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:22	7439-95-4	
Manganese, Total Recoverable	0.076	mg/L	0.0050	1	09/22/20 13:40	09/23/20 12:22	7439-96-5	
Potassium, Total Recoverable	13.1	mg/L	0.50	1	09/22/20 13:40	09/23/20 12:22	7440-09-7	
Sodium, Total Recoverable	2820	mg/L	5.0	10	09/22/20 13:40	09/23/20 13:46	7440-23-5	
<b>200.7 Metals, Dissolved</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City						
Iron, Dissolved	2.4	mg/L	0.050	1	09/18/20 08:15	09/19/20 17:38	7439-89-6	
Manganese, Dissolved	0.079	mg/L	0.0050	1	09/18/20 08:15	09/19/20 17:38	7439-96-5	
<b>2320B Alkalinity</b>		Analytical Method: SM 2320B Pace Analytical Services - Kansas City						
Alkalinity,Bicarbonate (CaCO3)	240	mg/L	20.0	1		09/18/20 12:17		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	20.0	1		09/18/20 12:17		
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	8420	mg/L	250	1		09/17/20 12:58		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City						
pH at 25 Degrees C	7.2	Std. Units	0.10	1		09/19/20 11:26		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City						
Chloride	4840	mg/L	1000	1000		09/24/20 16:17	16887-00-6	
Fluoride	<0.20	mg/L	0.20	1		09/24/20 15:47	16984-48-8	
Sulfate	187	mg/L	20.0	20		09/24/20 16:02	14808-79-8	

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

Sample: MW-33-091520	Lab ID: 60348431004	Collected: 09/15/20 09:30	Received: 09/15/20 17:20	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 Pace Analytical Services - Kansas City						
Boron, Total Recoverable	1.6	mg/L	0.10	1	09/22/20 13:40	09/23/20 12:25	7440-42-8	
Calcium, Total Recoverable	246	mg/L	0.20	1	09/22/20 13:40	09/23/20 12:25	7440-70-2	
Iron, Total Recoverable	1.9	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:25	7439-89-6	
Magnesium, Total Recoverable	127	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:25	7439-95-4	
Manganese, Total Recoverable	0.080	mg/L	0.0050	1	09/22/20 13:40	09/23/20 12:25	7439-96-5	
Potassium, Total Recoverable	20.9	mg/L	0.50	1	09/22/20 13:40	09/23/20 12:25	7440-09-7	
Sodium, Total Recoverable	4130	mg/L	5.0	10	09/22/20 13:40	09/23/20 13:28	7440-23-5	
<b>200.7 Metals, Dissolved</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City						
Iron, Dissolved	1.7	mg/L	0.050	1	09/18/20 08:15	09/19/20 17:48	7439-89-6	
Manganese, Dissolved	0.078	mg/L	0.0050	1	09/18/20 08:15	09/19/20 17:48	7439-96-5	
<b>2320B Alkalinity</b>		Analytical Method: SM 2320B Pace Analytical Services - Kansas City						
Alkalinity,Bicarbonate (CaCO <sub>3</sub> )	195	mg/L	20.0	1		09/18/20 12:22		
Alkalinity,Carbonate (CaCO <sub>3</sub> )	ND	mg/L	20.0	1		09/18/20 12:22		
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	12900	mg/L	500	1		09/17/20 12:58		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City						
pH at 25 Degrees C	7.4	Std. Units	0.10	1		09/19/20 11:19		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City						
Chloride	6960	mg/L	1000	1000		09/18/20 12:44	16887-00-6	
Fluoride	<0.20	mg/L	0.20	1		09/17/20 18:44	16984-48-8	
Sulfate	277	mg/L	20.0	20		09/17/20 18:58	14808-79-8	

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

Sample: MW-34-091520	Lab ID: 60348431005	Collected: 09/15/20 10:15	Received: 09/15/20 17:20	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 Pace Analytical Services - Kansas City						
Boron, Total Recoverable	2.2	mg/L	0.10	1	09/22/20 13:40	09/23/20 12:35	7440-42-8	
Calcium, Total Recoverable	203	mg/L	0.20	1	09/22/20 13:40	09/23/20 12:35	7440-70-2	
Iron, Total Recoverable	1.8	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:35	7439-89-6	
Magnesium, Total Recoverable	117	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:35	7439-95-4	
Manganese, Total Recoverable	0.15	mg/L	0.0050	1	09/22/20 13:40	09/23/20 12:35	7439-96-5	
Potassium, Total Recoverable	15.6	mg/L	0.50	1	09/22/20 13:40	09/23/20 12:35	7440-09-7	
Sodium, Total Recoverable	3770	mg/L	5.0	10	09/22/20 13:40	09/23/20 13:31	7440-23-5	
<b>200.7 Metals, Dissolved</b>		Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City						
Iron, Dissolved	1.6	mg/L	0.050	1	09/18/20 08:15	09/19/20 17:53	7439-89-6	
Manganese, Dissolved	0.15	mg/L	0.0050	1	09/18/20 08:15	09/19/20 17:53	7439-96-5	
<b>2320B Alkalinity</b>		Analytical Method: SM 2320B Pace Analytical Services - Kansas City						
Alkalinity,Bicarbonate (CaCO3)	202	mg/L	20.0	1		09/18/20 12:26		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	20.0	1		09/18/20 12:26		
<b>2540C Total Dissolved Solids</b>		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	11400	mg/L	500	1		09/17/20 12:59		
<b>4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City						
pH at 25 Degrees C	7.6	Std. Units	0.10	1		09/19/20 11:22		H6
<b>300.0 IC Anions 28 Days</b>		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City						
Chloride	6340	mg/L	500	500		09/18/20 13:15	16887-00-6	
Fluoride	<0.20	mg/L	0.20	1		09/17/20 19:13	16984-48-8	
Sulfate	449	mg/L	100	100		09/18/20 12:59	14808-79-8	

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## ANALYTICAL RESULTS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

Sample: DUP-LF-091520	Lab ID: 60348431006	Collected: 09/15/20 17:00	Received: 09/15/20 17:20	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								
Pace Analytical Services - Kansas City								
Boron, Total Recoverable	0.76	mg/L	0.10	1	09/22/20 13:40	09/23/20 12:38	7440-42-8	
Calcium, Total Recoverable	256	mg/L	0.20	1	09/22/20 13:40	09/23/20 12:38	7440-70-2	
Iron, Total Recoverable	2.4	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:38	7439-89-6	
Magnesium, Total Recoverable	88.7	mg/L	0.050	1	09/22/20 13:40	09/23/20 12:38	7439-95-4	
Manganese, Total Recoverable	0.077	mg/L	0.0050	1	09/22/20 13:40	09/23/20 12:38	7439-96-5	
Potassium, Total Recoverable	13.4	mg/L	0.50	1	09/22/20 13:40	09/23/20 12:38	7440-09-7	
Sodium, Total Recoverable	2750	mg/L	5.0	10	09/22/20 13:40	09/23/20 13:33	7440-23-5	
<b>200.7 Metals, Dissolved</b>								
Analytical Method: EPA 200.7 Preparation Method: EPA 200.7								
Pace Analytical Services - Kansas City								
Iron, Dissolved	2.4	mg/L	0.050	1	09/18/20 08:15	09/19/20 17:59	7439-89-6	
Manganese, Dissolved	0.081	mg/L	0.0050	1	09/18/20 08:15	09/19/20 17:59	7439-96-5	
<b>2320B Alkalinity</b>								
Analytical Method: SM 2320B								
Pace Analytical Services - Kansas City								
Alkalinity,Bicarbonate (CaCO3)	233	mg/L	20.0	1		09/18/20 12:32		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	20.0	1		09/18/20 12:32		
<b>2540C Total Dissolved Solids</b>								
Analytical Method: SM 2540C								
Pace Analytical Services - Kansas City								
Total Dissolved Solids	8520	mg/L	250	1		09/17/20 12:59		
<b>4500H+ pH, Electrometric</b>								
Analytical Method: SM 4500-H+B								
Pace Analytical Services - Kansas City								
pH at 25 Degrees C	7.2	Std. Units	0.10	1		09/19/20 11:56		H6
<b>300.0 IC Anions 28 Days</b>								
Analytical Method: EPA 300.0								
Pace Analytical Services - Kansas City								
Chloride	5830	mg/L	1000	1000		09/28/20 12:07	16887-00-6	
Fluoride	<0.20	mg/L	0.20	1		09/17/20 19:27	16984-48-8	
Sulfate	198	mg/L	100	100		09/18/20 13:53	14808-79-8	

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR  
Pace Project No.: 60348431

QC Batch: 678219 Analysis Method: EPA 200.7  
QC Batch Method: EPA 200.7 Analysis Description: 200.7 Metals, Total  
Laboratory: Pace Analytical Services - Kansas City  
Associated Lab Samples: 60348431001, 60348431002, 60348431003, 60348431004, 60348431005, 60348431006

METHOD BLANK: 2742633 Matrix: Water  
Associated Lab Samples: 60348431001, 60348431002, 60348431003, 60348431004, 60348431005, 60348431006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Boron	mg/L	<0.10	0.10	09/23/20 12:06	
Calcium	mg/L	<0.20	0.20	09/23/20 12:06	
Iron	mg/L	<0.050	0.050	09/23/20 12:06	
Magnesium	mg/L	<0.050	0.050	09/23/20 12:06	
Manganese	mg/L	<0.0050	0.0050	09/23/20 12:06	
Potassium	mg/L	<0.50	0.50	09/23/20 12:06	
Sodium	mg/L	<0.50	0.50	09/23/20 12:06	

LABORATORY CONTROL SAMPLE: 2742634

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Boron	mg/L	1	1.1	107	85-115	
Calcium	mg/L	10	10.4	104	85-115	
Iron	mg/L	10	10.6	106	85-115	
Magnesium	mg/L	10	10.6	106	85-115	
Manganese	mg/L	1	1.0	101	85-115	
Potassium	mg/L	10	10.4	104	85-115	
Sodium	mg/L	10	10.6	106	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2742635 2742636

Parameter	Units	60348431002		60348431003		60348431004		60348431005		% Rec Limits	RPD	Max RPD	Qual
		MS Result	MSD Spike Conc.	MS Result	MSD Spike Conc.	MS Result	MSD Spike Conc.	MS Result	MSD Spike Conc.				
Boron	mg/L	2.0	1	3.1	1	3.0	1	108	106	70-130	1	20	
Calcium	mg/L	525	10	549	10	534	10	238	93	70-130	3	20	M1
Iron	mg/L	3.4	10	13.6	10	13.5	10	101	101	70-130	0	20	
Magnesium	mg/L	277	10	294	10	294	10	169	172	70-130	0	20	M1
Manganese	mg/L	0.19	1	1.2	1	1.2	1	98	101	70-130	3	20	
Potassium	mg/L	37.7	10	51.6	10	50.1	10	139	123	70-130	3	20	M1
Sodium	mg/L	7870	10	7950	10	7850	10	840	-120	70-130	1	20	M1

MATRIX SPIKE SAMPLE: 2742637

Parameter	Units	60348435002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Boron	mg/L	5.5	1	6.5	108	70-130	
Calcium	mg/L	315	10	324	95	70-130	

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

MATRIX SPIKE SAMPLE: 2742637		60348435002	Spike	MS	MS	% Rec	
Parameter	Units	Result	Conc.	Result	% Rec	Limits	Qualifiers
Iron	mg/L	3.3	10	13.4	100	70-130	
Magnesium	mg/L	115	10	125	104	70-130	
Manganese	mg/L	0.61	1	1.6	96	70-130	
Potassium	mg/L	27.5	10	37.7	101	70-130	
Sodium	mg/L	236	10	245	93	70-130	

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

QC Batch:	677531	Analysis Method:	EPA 200.7
QC Batch Method:	EPA 200.7	Analysis Description:	200.7 Metals, Dissolved
		Laboratory:	Pace Analytical Services - Kansas City

Associated Lab Samples: 60348431001, 60348431002, 60348431003, 60348431004, 60348431005, 60348431006

METHOD BLANK: 2739580 Matrix: Water  
Associated Lab Samples: 60348431001, 60348431002, 60348431003, 60348431004, 60348431005, 60348431006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Iron, Dissolved	mg/L	<0.050	0.050	09/19/20 17:14	
Manganese, Dissolved	mg/L	<0.0050	0.0050	09/19/20 17:14	

LABORATORY CONTROL SAMPLE: 2739581

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Iron, Dissolved	mg/L	10	10.5	105	85-115	
Manganese, Dissolved	mg/L	1	1.0	103	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2739582 2739583

Parameter	Units	60348431002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Iron, Dissolved	mg/L	3.1	10	10	12.8	12.8	97	97	70-130	0	20	
Manganese, Dissolved	mg/L	0.21	1	1	1.2	1.2	96	95	70-130	1	20	

MATRIX SPIKE SAMPLE: 2739584

Parameter	Units	60348493001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Iron, Dissolved	mg/L	<0.050	10	9.7	97	70-130	
Manganese, Dissolved	mg/L	0.011	1	0.93	92	70-130	

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

QC Batch:	677414	Analysis Method:	SM 2320B
QC Batch Method:	SM 2320B	Analysis Description:	2320B Alkalinity
		Laboratory:	Pace Analytical Services - Kansas City

Associated Lab Samples: 60348431001, 60348431002, 60348431003, 60348431004, 60348431005, 60348431006

METHOD BLANK: 2738945 Matrix: Water  
Associated Lab Samples: 60348431001, 60348431002, 60348431003, 60348431004, 60348431005, 60348431006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Alkalinity,Bicarbonate (CaCO3)	mg/L	ND	20.0	09/18/20 11:51	
Alkalinity,Carbonate (CaCO3)	mg/L	ND	20.0	09/18/20 11:51	

SAMPLE DUPLICATE: 2738947

Parameter	Units	60348431001 Result	Dup Result	RPD	Max RPD	Qualifiers
Alkalinity,Bicarbonate (CaCO3)	mg/L	312	312	0	10	
Alkalinity,Carbonate (CaCO3)	mg/L	ND	ND		10	

SAMPLE DUPLICATE: 2738948

Parameter	Units	60348435005 Result	Dup Result	RPD	Max RPD	Qualifiers
Alkalinity,Bicarbonate (CaCO3)	mg/L	270	274	2	10	
Alkalinity,Carbonate (CaCO3)	mg/L	ND	ND		10	

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

QC Batch:	677404	Analysis Method:	SM 2540C
QC Batch Method:	SM 2540C	Analysis Description:	2540C Total Dissolved Solids
		Laboratory:	Pace Analytical Services - Kansas City

Associated Lab Samples: 60348431001, 60348431002, 60348431003, 60348431004, 60348431005, 60348431006

METHOD BLANK: 2738905 Matrix: Water  
Associated Lab Samples: 60348431001, 60348431002, 60348431003, 60348431004, 60348431005, 60348431006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	<5.0	5.0	09/17/20 12:55	

LABORATORY CONTROL SAMPLE: 2738906

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	1000	995	100	80-120	

SAMPLE DUPLICATE: 2738907

Parameter	Units	60348074001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	1010	1020	1	10	

SAMPLE DUPLICATE: 2738908

Parameter	Units	60348217001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	344	354	3	10	

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### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

QC Batch: 677706

Analysis Method: SM 4500-H+B

QC Batch Method: SM 4500-H+B

Analysis Description: 4500H+B pH

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60348431001, 60348431002, 60348431003, 60348431004, 60348431005

SAMPLE DUPLICATE: 2740238

Parameter	Units	60348453001 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	6.9	7.0	1	5	H6

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**QUALITY CONTROL DATA**

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

QC Batch: 677707

Analysis Method: SM 4500-H+B

QC Batch Method: SM 4500-H+B

Analysis Description: 4500H+B pH

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60348431006

SAMPLE DUPLICATE: 2740239

Parameter	Units	60348435006 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	7.2	7.2	0	5	H6

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**QUALITY CONTROL DATA**

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

QC Batch: 677373 Analysis Method: EPA 300.0  
 QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions  
 Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60348431001, 60348431004, 60348431005, 60348431006

METHOD BLANK: 2738789 Matrix: Water

Associated Lab Samples: 60348431001, 60348431004, 60348431005, 60348431006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	09/17/20 15:50	
Fluoride	mg/L	<0.20	0.20	09/17/20 15:50	
Sulfate	mg/L	<1.0	1.0	09/17/20 15:50	

METHOD BLANK: 2741280 Matrix: Water

Associated Lab Samples: 60348431001, 60348431004, 60348431005, 60348431006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	09/18/20 10:57	
Fluoride	mg/L	<0.20	0.20	09/18/20 10:57	
Sulfate	mg/L	<1.0	1.0	09/18/20 10:57	

METHOD BLANK: 2741286 Matrix: Water

Associated Lab Samples: 60348431001, 60348431004, 60348431005, 60348431006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	09/19/20 08:27	
Fluoride	mg/L	<0.20	0.20	09/19/20 08:27	
Sulfate	mg/L	<1.0	1.0	09/19/20 08:27	

METHOD BLANK: 2741917 Matrix: Water

Associated Lab Samples: 60348431001, 60348431004, 60348431005, 60348431006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	09/21/20 09:08	
Fluoride	mg/L	<0.20	0.20	09/21/20 09:08	
Sulfate	mg/L	<1.0	1.0	09/21/20 09:08	

LABORATORY CONTROL SAMPLE: 2738790

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.5	90	90-110	
Fluoride	mg/L	2.5	2.5	99	90-110	

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

LABORATORY CONTROL SAMPLE: 2738790

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Sulfate	mg/L	5	4.7	94	90-110	

LABORATORY CONTROL SAMPLE: 2741281

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.9	98	90-110	
Fluoride	mg/L	2.5	2.4	94	90-110	
Sulfate	mg/L	5	4.9	99	90-110	

LABORATORY CONTROL SAMPLE: 2741287

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	5.3	105	90-110	
Fluoride	mg/L	2.5	2.6	102	90-110	
Sulfate	mg/L	5	5.3	107	90-110	

LABORATORY CONTROL SAMPLE: 2741918

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	5.1	103	90-110	
Fluoride	mg/L	2.5	2.6	105	90-110	
Sulfate	mg/L	5	5.1	103	90-110	

MATRIX SPIKE SAMPLE: 2738791

Parameter	Units	60348435002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	237	250	494	103	80-120	
Fluoride	mg/L	2.8	2.5	5.3	102	80-120	
Sulfate	mg/L	1380	500	1930	110	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2738792 2738793

Parameter	Units	60348429002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chloride	mg/L	2030	250	250	2410	2420	152	153	80-120	0	15	E,M1
Fluoride	mg/L	4.8	50	50	55.9	56.4	102	103	80-120	1	15	
Sulfate	mg/L	587	250	250	919	917	133	132	80-120	0	15	M1

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### REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR  
Pace Project No.: 60348431

QC Batch: 678749      Analysis Method: EPA 300.0  
QC Batch Method: EPA 300.0      Analysis Description: 300.0 IC Anions  
Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60348431002, 60348431003

METHOD BLANK: 2744389      Matrix: Water

Associated Lab Samples: 60348431002, 60348431003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	09/24/20 14:00	
Fluoride	mg/L	<0.20	0.20	09/24/20 14:00	
Sulfate	mg/L	<1.0	1.0	09/24/20 14:00	

METHOD BLANK: 2745457      Matrix: Water

Associated Lab Samples: 60348431002, 60348431003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	09/25/20 09:08	
Fluoride	mg/L	<0.20	0.20	09/25/20 09:08	
Sulfate	mg/L	<1.0	1.0	09/25/20 09:08	

LABORATORY CONTROL SAMPLE: 2744390

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	5.3	106	90-110	
Fluoride	mg/L	2.5	2.6	102	90-110	
Sulfate	mg/L	5	5.4	107	90-110	

LABORATORY CONTROL SAMPLE: 2745458

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.7	94	90-110	
Fluoride	mg/L	2.5	2.5	98	90-110	
Sulfate	mg/L	5	4.9	99	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2744391      2744392

Parameter	Units	MS		MSD		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
		60348651039 Result	Spike Conc.	Spike Conc.	Result						
Chloride	mg/L	1170	1000	1000	2210	2200	104	103	80-120	1	15
Fluoride	mg/L	ND	500	500	493	489	99	98	80-120	1	15
Sulfate	mg/L	272	1000	1000	1270	1260	100	99	80-120	1	15

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

MATRIX SPIKE SAMPLE:		2744393					
Parameter	Units	60349229003 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	278	250	563	114	80-120	
Fluoride	mg/L	10.9	125	137	101	80-120	
Sulfate	mg/L	3820	2000	4980	58	80-120	M1

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### QUALITY CONTROL DATA

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

QC Batch: 679344

Analysis Method: EPA 300.0

QC Batch Method: EPA 300.0

Analysis Description: 300.0 IC Anions

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60348431006

METHOD BLANK: 2747020

Matrix: Water

Associated Lab Samples: 60348431006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	09/28/20 10:23	

LABORATORY CONTROL SAMPLE: 2747021

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.7	94	90-110	

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## QUALIFIERS

Project: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

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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.

### 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: LEC 847 LANDFILL CCR

Pace Project No.: 60348431

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60348431001	MW-32-091520	EPA 200.7	678219	EPA 200.7	678264
60348431002	MW-35-091520	EPA 200.7	678219	EPA 200.7	678264
60348431003	MW-31R-091520	EPA 200.7	678219	EPA 200.7	678264
60348431004	MW-33-091520	EPA 200.7	678219	EPA 200.7	678264
60348431005	MW-34-091520	EPA 200.7	678219	EPA 200.7	678264
60348431006	DUP-LF-091520	EPA 200.7	678219	EPA 200.7	678264
60348431001	MW-32-091520	EPA 200.7	677531	EPA 200.7	677630
60348431002	MW-35-091520	EPA 200.7	677531	EPA 200.7	677630
60348431003	MW-31R-091520	EPA 200.7	677531	EPA 200.7	677630
60348431004	MW-33-091520	EPA 200.7	677531	EPA 200.7	677630
60348431005	MW-34-091520	EPA 200.7	677531	EPA 200.7	677630
60348431006	DUP-LF-091520	EPA 200.7	677531	EPA 200.7	677630
60348431001	MW-32-091520	SM 2320B	677414		
60348431002	MW-35-091520	SM 2320B	677414		
60348431003	MW-31R-091520	SM 2320B	677414		
60348431004	MW-33-091520	SM 2320B	677414		
60348431005	MW-34-091520	SM 2320B	677414		
60348431006	DUP-LF-091520	SM 2320B	677414		
60348431001	MW-32-091520	SM 2540C	677404		
60348431002	MW-35-091520	SM 2540C	677404		
60348431003	MW-31R-091520	SM 2540C	677404		
60348431004	MW-33-091520	SM 2540C	677404		
60348431005	MW-34-091520	SM 2540C	677404		
60348431006	DUP-LF-091520	SM 2540C	677404		
60348431001	MW-32-091520	SM 4500-H+B	677706		
60348431002	MW-35-091520	SM 4500-H+B	677706		
60348431003	MW-31R-091520	SM 4500-H+B	677706		
60348431004	MW-33-091520	SM 4500-H+B	677706		
60348431005	MW-34-091520	SM 4500-H+B	677706		
60348431006	DUP-LF-091520	SM 4500-H+B	677707		
60348431001	MW-32-091520	EPA 300.0	677373		
60348431002	MW-35-091520	EPA 300.0	678749		
60348431003	MW-31R-091520	EPA 300.0	678749		
60348431004	MW-33-091520	EPA 300.0	677373		
60348431005	MW-34-091520	EPA 300.0	677373		
60348431006	DUP-LF-091520	EPA 300.0	677373		
60348431006	DUP-LF-091520	EPA 300.0	679344		

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Sample Condition Upon Receipt

WO#: 60348431



60348431

Client Name: Every Kansas Central, Inc.

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 [x] No [ ] Seals intact: Yes [x] No [ ]

Packing Material: Bubble Wrap [ ] Bubble Bags [ ] Foam [ ] None [ ] Other #ZPLC

Thermometer Used: T301 Type of Ice: (Wet) Blue None

Cooler Temperature (°C): As-read 17.2, 17.1 Corr. Factor 10.5 Corrected 22.3, 22.2

Date and initials of person examining contents: 09/02/04

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3 day
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input 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	Containers for MW32 say sample
Samples contain multiple phases? Matrix: wt	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	@ 0935
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: \_\_\_\_\_

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









**ATTACHMENT 2**  
**Statistical Analysis**

**ATTACHMENT 2-1**  
**September 2019 Statistical Analysis**



HALEY & ALDRICH, INC.  
6500 Rockside Road  
Suite 200  
Cleveland, OH 44131  
216.739.0555

## TECHNICAL MEMORANDUM

October 7, 2022  
File No. 129778-049

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: September 2019 Semi-Annual Groundwater Detection Monitoring Data  
Statistical Evaluation  
**Completed on January 20, 2020**  
Lawrence Energy Center  
847 Landfill

Pursuant to Title 40 Code of Federal Regulations (40 CFR) §§ 257.93 and 257.94 (Rule), this memorandum summarizes the statistical evaluation of the analytical results for the **September 2019** semi-annual detection monitoring groundwater sampling event for the Lawrence Energy Center (LEC) 847 Landfill. This semi-annual detection monitoring groundwater sampling event was completed on **September 3 – 4, 2019**, with laboratory results received and accepted on **October 21, 2019**.

The statistical evaluation discussed in this memorandum was conducted to determine if Appendix III groundwater monitoring constituents have been detected in downgradient wells at concentrations that represent a statistically significant increase (SSI) above background or upgradient wells consistent with the requirements in 40 CFR § 257.94.

### Statistical Evaluation of Appendix III Constituents

The Rule provides four specific options for statistical evaluation of groundwater quality data collected at the coal combustion residuals (CCR) unit (40 CFR § 257.93(f) (1-4)). One statistical method used for these evaluations, the prediction limits (PL) method, was certified by Haley & Aldrich, Inc. on April 17, 2019. The PL method, as determined applicable for this sampling event, was used to evaluate potential SSIs above background. Background levels for each constituent listed in Appendix III (boron, calcium, chloride, fluoride, pH, sulfate, and total dissolved solids) were computed as upper prediction limits (UPL), considering one future observation, and a minimum 95 percent confidence coefficient. The most recent groundwater sampling event from each compliance well was compared to the corresponding background PL to determine if an SSI existed.

## STATISTICAL EVALUATION

Either an interwell or intrawell evaluation was used to complete the statistical evaluation of the referenced data set. Interwell evaluation compares the most recent values from downgradient compliance wells against a background dataset composed of upgradient well data (MW-32 and MW-35), and the intrawell evaluation compares the most recent values from each compliance well against a background dataset composed of its own historical data.

A PL procedure is one in which a concentration limit for each constituent is established from the distribution of the background data, with a specified confidence level (e.g., 95 percent). The upper endpoint of a concentration limit is called the UPL. Depending on the background data distribution, parametric or non-parametric PL procedures are used to evaluate groundwater monitoring data using this method. Parametric PLs 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 PL. If all the background data are non-detect, a maximum reporting limit may serve as an appropriate UPL.

The statistical evaluation was conducted using the background dataset for all Appendix III constituents. The UPLs 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 locations MW-32 and MW-35 (for interwell evaluation) were combined to calculate the UPL for each Appendix III constituent. The variability and distribution of the pooled dataset were evaluated to determine the method for UPL 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 2019 (interwell evaluation) and June 2017 (intrawell evaluation)**.

## RESULTS OF APPENDIX III DOWNGRADIENT STATISTICAL COMPARISONS

The sample concentrations from the downgradient wells for each of the Appendix III constituents from the September 2019 semi-annual detection monitoring sampling event were compared to their respective background PLs (Table I). A sample concentration greater than the background UPL is considered to represent an SSI. Based on previous compliance sampling events, statistical evaluations, and associated alternative source demonstrations, an intrawell comparison is utilized for MW-34 for boron and fluoride 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 on groundwater sampling data collected in September 2019, no SSIs above background PLs occurred at the LEC 847 Landfill.**

Tables:

Table I – Summary of Semi-Annual Detection Groundwater Monitoring Statistical Analysis Evaluation



## **TABLE**

**TABLE I**  
**SUMMARY OF SEMI-ANNUAL DETECTION GROUNDWATER MONITORING STATISTICAL EVALUATION**  
 SEPTEMBER 2019 SAMPLING EVENT  
 LAWRENCE ENERGY CENTER - 847 LANDFILL  
 LAWRENCE, KANSAS

Location Id	Frequency of Detection	Percent Non-Detects	Range of Non-Detect	Maximum Detect	Variance	Standard Deviation	Coefficient of Variance	Outlier Presence	Outlier Removed	Trend	Distribution Well	September 2019 Concentration (mg/L)	Inter-well Analysis		Intra-well Analysis	
													Background Limits <sup>1</sup> (UPL) mg/L	SSI	Background Limit <sup>2</sup> (UPL) mg/L	SSI
<b>CCR Appendix-III: Boron, Total (mg/L)</b>																
MW-32	12/12	0%	-	0.19	0.00003348	0.005786	0.0321	No	No	Stable			2.05			
MW-35	12/12	0%	-	2.05	0.02365	0.1538	0.08458	Yes	No	Stable						
MW-31R	12/12	0%	-	0.71	0.004687	0.06846	0.1098	Yes	No	Stable	Normal	0.523		N		
MW-33	12/12	0%	-	1.7	0.01126	0.1061	0.06534	No	No	Stable	Non-parametric	1.39		N		
MW-34	12/12	0%	-	2.13	0.01847	0.1359	0.06839	Yes	No	Increasing	Normal	1.81			2.56	N
<b>CCR Appendix-III: Calcium, Total (mg/L)</b>																
MW-32	12/12	0%	-	61.9	3.317	1.821	0.0309	No	No	Stable			545			
MW-35	12/12	0%	-	545	1632	40.39	0.07936	Yes	No	Stable						
MW-31R	12/12	0%	-	248	230	15.16	0.06888	No	No	Stable	Normal	198		N		
MW-33	12/12	0%	-	265	128.4	11.33	0.04535	No	No	Stable	Normal	224		N		
MW-34	12/12	0%	-	243	206.4	14.37	0.06489	No	No	Decreasing	Normal	195		N		
<b>CCR Appendix-III: Chloride (mg/L)</b>																
MW-32	12/12	0%	-	113	43.56	6.6	0.06702	No	No	Increasing			16700			
MW-35	12/12	0%	-	16700	1546000	1244	0.08788	No	No	Stable						
MW-31R	11/12	8%	1-1	5210	1581000	1257	0.3348	Yes	No	Stable	Non-parametric	3530		N		
MW-33	12/12	0%	-	8700	321800	567.2	0.07537	Yes	No	Stable	Normal	7300		N		
MW-34	12/12	0%	-	6960	167200	408.9	0.06551	No	No	Stable	Normal	6330		N		
<b>CCR Appendix-III: Fluoride (mg/L)</b>																
MW-32	9/12	25%	0.2-0.2	0.31	0.00119	0.0345	0.1473	No	No	Stable			1.70			
MW-35	2/12	83%	0.1-10	1.6	7.976	2.824	2.354	Yes	No	Stable						
MW-31R	9/12	25%	0.2-0.2	0.73	0.03657	0.1912	0.4306	No	No	Stable	Normal	0.31		N		
MW-33	6/12	50%	0.2-4	1.4	1.155	1.075	1.06	Yes	No	Stable	Non-parametric	<0.20		N		
MW-34	9/12	25%	0.2-10	1.9	6.67	2.583	1.297	Yes	No	Stable	Non-parametric	1.2			3.85	N
<b>CCR Appendix-III: pH (lab) (SU)</b>																
MW-32	12/12	0%	-	7.9	0.02424	0.1557	0.02058	Yes	No	Stable			8.25			
MW-35	12/12	0%	-	7.4	0.008788	0.09374	0.01305	Yes	No	Stable						
MW-31R	12/12	0%	-	7.5	0.01114	0.1055	0.01441	Yes	No	Stable	Normal	7.3		N		
MW-33	12/12	0%	-	7.6	0.006061	0.07785	0.01047	Yes	No	Stable	Normal	7.3		N		
MW-34	12/12	0%	-	7.9	0.02265	0.1505	0.0197	No	No	Stable	Normal	7.4		N		
<b>CCR Appendix-III: Sulfate (mg/L)</b>																
MW-32	12/12	0%	-	9.1	0.9245	0.9615	0.1334	No	No	Decreasing			666			
MW-35	12/12	0%	-	666	658	25.65	0.04132	No	No	Stable						
MW-31R	12/12	0%	-	180	531.2	23.05	0.1579	No	No	Stable	Normal	180		N		
MW-33	12/12	0%	-	462	2849	53.38	0.1656	Yes	No	Stable	Normal	304		N		
MW-34	12/12	0%	-	517	1434	37.87	0.08215	No	No	Stable	Normal	436		N		
<b>CCR Appendix-III: Total Dissolved Solids (TDS) (mg/L)</b>																
MW-32	12/12	0%	-	525	334.3	18.28	0.03708	No	No	Stable			27100			
MW-35	12/12	0%	-	27100	48400000	6957	0.3006	Yes	No	Stable						
MW-31R	12/12	0%	-	8200	698600	835.8	0.117	No	No	Stable	Normal	7160		N		
MW-33	12/12	0%	-	14100	1537000	1240	0.09925	No	No	Stable	Normal	12400		N		
MW-34	12/12	0%	-	12300	6272000	2504	0.2381	Yes	No	Stable	Non-parametric	11000		N		

**Notes and Abbreviations:**

<sup>1</sup> Interwell background data collected from 08/16/2016 through 09/04/2019, unless otherwise noted.

<sup>2</sup> Intrawell background data collected from 08/16/2016 through 06/26/2017.

CCR = coal combustion residual

mg/L = milligrams per Liter

SSI = statistically significant increase

SU = standard unit

UPL = upper prediction limit

**ATTACHMENT 2-2**  
**March 2020 Statistical Analysis**



HALEY & ALDRICH, INC.  
6500 Rockside Road  
Suite 200  
Cleveland, OH 44131  
216.739.0555

## TECHNICAL MEMORANDUM

October 7, 2022  
File No. 129778-049

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 2020 Semi-annual Groundwater Detection Monitoring Data  
Statistical Evaluation  
**Completed on July 14, 2020**  
Lawrence Energy Center  
847 Landfill

Pursuant to Title 40 Code of Federal Regulations (40 CFR) §§ 257.93 and 257.94 (Rule), this memorandum summarizes the statistical evaluation of the analytical results for the **March 2020** semi-annual detection monitoring groundwater sampling event for the Lawrence Energy Center (LEC) 847 Landfill. This semi-annual detection monitoring groundwater sampling event was completed on **March 10, 2020**, with laboratory results received and accepted on **April 18, 2020**.

The statistical evaluation discussed in this memorandum was conducted to determine if Appendix III groundwater monitoring constituents have been detected in downgradient wells at concentrations that represent a statistically significant increase (SSI) above background or upgradient wells consistent with the requirements in 40 CFR § 257.94.

### Statistical Evaluation of Appendix III Constituents

The Rule provides four specific options for statistical evaluation of groundwater quality data collected at the coal combustion residuals (CCR) unit (40 CFR § 257.93(f) (1-4)). One statistical method used for these evaluations, the prediction limits (PL) method, was certified by Haley & Aldrich, Inc. on April 17, 2019. The PL method, as determined applicable for this sampling event, was used to evaluate potential SSIs above background. Background levels for each constituent listed in Appendix III (boron, calcium, chloride, fluoride, pH, sulfate, and total dissolved solids) were computed as upper prediction limits (UPL), considering one future observation, and a minimum 95 percent confidence coefficient. The most recent groundwater sampling event from each compliance well was compared to the corresponding background PL to determine if an SSI existed.

## STATISTICAL EVALUATION

Either an interwell or intrawell evaluation was used to complete the statistical evaluation of the referenced data set. Interwell evaluation compares the most recent values from downgradient compliance wells against a background dataset composed of upgradient well data (MW-32 and MW-35), and the intrawell evaluation compares the most recent values from each compliance well against a background dataset composed of its own historical data.

A PL procedure is one in which a concentration limit for each constituent is established from the distribution of the background data, with a specified confidence level (e.g., 95 percent). The upper endpoint of a concentration limit is called the UPL. Depending on the background data distribution, parametric or non-parametric PL procedures are used to evaluate groundwater monitoring data using this method. Parametric PLs 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 PL. If all the background data are non-detect, a maximum reporting limit may serve as an appropriate UPL.

The statistical evaluation was conducted using the background dataset for all Appendix III constituents. The UPLs 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 locations (MW-32 and MW-35 for interwell evaluation) were combined to calculate the UPL for each Appendix III constituent. The variability and distribution of the pooled dataset was evaluated to determine the method for UPL 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 2019 (interwell and intrawell evaluation)**.

## RESULTS OF APPENDIX III DOWNGRADIENT STATISTICAL COMPARISONS

The sample concentrations from the downgradient wells for each of the Appendix III constituents from the March 2020 semi-annual detection monitoring sampling event were compared to their respective background PLs (Table I). A sample concentration greater than the background UPL is considered to represent an SSI. Based on previous compliance sampling events, statistical evaluations, and associated alternative source demonstrations, an intrawell comparison is utilized for MW-34 for boron and fluoride 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 on groundwater sampling data collected in March 2020, no SSIs above background PLs occurred at the LEC 847 Landfill.**

Tables:

Table I – Summary of Semi-annual Detection Groundwater Monitoring Statistical Evaluation

## TABLE

**TABLE I**  
**SUMMARY OF SEMI-ANNUAL DETECTION GROUNDWATER MONITORING STATISTICAL EVALUATION**  
MARCH 2020 SAMPLING EVENT  
LAWRENCE ENERGY CENTER 847 LANDFILL  
LAWRENCE, KANSAS

Location Id	Frequency of Detection	Percent Non-Detects	Range of Non-Detect	Maximum Detect	Variance	Standard Deviation	Coefficient of Variance	Outlier Presence	Outlier Removed	Trend	Distribution Well	March 2020 Concentration (mg/L)	Inter-well Analysis		Intra-well Analysis	
													Background Limits <sup>1</sup> (UPL) mg/L	SSI	Background Limit <sup>2</sup> (UPL) mg/L	SSI
<b>CCR Appendix-III: Boron, Total (mg/L)</b>																
MW-32	13/13	0%	-	0.19	0.00003069	0.00554	0.03074	No	No	Stable			2.050			
MW-35	13/13	0%	-	2.05	0.02189	0.1479	0.08118	Yes	No	Stable						
MW-31R	13/13	0%	-	0.719	0.004996	0.07068	0.112	No	No	Decreasing	Normal	0.719		N		
MW-33	13/13	0%	-	1.7	0.01064	0.1032	0.06371	No	No	Stable	Non-parametric	1.56		N		
MW-34	13/13	0%	-	2.13	0.01759	0.1326	0.0665	Yes	No	Increasing	Normal	2.08			2.508	N
<b>CCR Appendix-III: Calcium, Total (mg/L)</b>																
MW-32	13/13	0%	-	61.9	3.057	1.749	0.02965	No	No	Stable			545			
MW-35	13/13	0%	-	545	1502	38.75	0.07603	Yes	No	Stable						
MW-31R	13/13	0%	-	264	358.6	18.94	0.08471	No	No	Stable	Normal	264		N		
MW-33	13/13	0%	-	265	118.1	10.87	0.04345	No	No	Stable	Normal	252		N		
MW-34	13/13	0%	-	243	199.3	14.12	0.06401	No	No	Decreasing	Normal	210		N		
<b>CCR Appendix-III: Chloride (mg/L)</b>																
MW-32	13/13	0%	-	113	40.42	6.358	0.06443	No	No	Increasing			16700			
MW-35	13/13	0%	-	16700	1741000	1319	0.09221	No	No	Stable						
MW-31R	12/13	8%	1-1	5210	1461000	1209	0.3193	Yes	No	Stable	Normal	4150		N		
MW-33	13/13	0%	-	8700	363800	603.1	0.08092	Yes	No	Stable	Normal	6580		N		
MW-34	13/13	0%	-	6960	168300	410.3	0.06609	No	No	Stable	Normal	5800		N		
<b>CCR Appendix-III: Fluoride (mg/L)</b>																
MW-32	10/13	23%	0.2-0.2	0.31	0.00119	0.03449	0.1456	No	No	Stable			1.700			
MW-35	2/13	85%	0.1-10	1.6	7.389	2.718	2.42	Yes	No	Stable						
MW-31R	9/13	31%	0.2-0.2	0.73	0.03811	0.1952	0.4589	No	No	Stable	Normal	< 0.20		N		
MW-33	6/13	54%	0.2-4	1.4	1.11	1.054	1.107	Yes	No	Stable	Non-parametric	< 0.20		N		
MW-34	10/13	23%	0.2-10	1.9	6.319	2.514	1.347	Yes	No	Stable	Normal	0.36			3.539	No
<b>CCR Appendix-III: pH (lab) (SU)</b>																
MW-32	13/13	0%	-	7.9	0.02231	0.1494	0.01973	Yes	No	Stable			8.25			
MW-35	13/13	0%	-	7.4	0.01167	0.108	0.015	Yes	No	Stable						
MW-31R	13/13	0%	-	7.5	0.01064	0.1032	0.01407	Yes	No	Stable	Normal	7.4		N		
MW-33	13/13	0%	-	7.8	0.0159	0.1261	0.0169	Yes	No	Stable	Normal	7.8		N		
MW-34	13/13	0%	-	7.9	0.02526	0.1589	0.02085	No	No	Increasing	Normal	7.4		N		
<b>CCR Appendix-III: Sulfate (mg/L)</b>																
MW-32	13/13	0%	-	9.1	0.9791	0.9895	0.1392	No	No	Decreasing			666			
MW-35	13/13	0%	-	666	760.1	27.57	0.04416	No	No	Stable						
MW-31R	13/13	0%	-	187	616.7	24.83	0.1666	No	No	Stable	Normal	187		N		
MW-33	13/13	0%	-	462	2615	51.14	0.1589	Yes	No	Stable	Normal	316		N		
MW-34	13/13	0%	-	535	1736	41.66	0.08928	No	No	Stable	Normal	535		N		
<b>CCR Appendix-III: Total Dissolved Solids (TDS) (mg/L)</b>																
MW-32	13/13	0%	-	525	308.3	17.56	0.03557	No	No	Stable			27100			
MW-35	13/13	0%	-	27100	44600000	6679	0.2869	Yes	No	Stable						
MW-31R	13/13	0%	-	8200	703800	838.9	0.1163	No	No	Stable	Normal	8050		N		
MW-33	13/13	0%	-	14100	1504000	1226	0.0975	No	No	Stable	Normal	13600		N		
MW-34	13/13	0%	-	12300	5797000	2408	0.2276	Yes	No	Stable	Non-parametric	11300		N		

**Notes and Abbreviations:**

<sup>1</sup> Interwell background data collected from 08/16/2016 through 09/04/2019, unless otherwise noted.

<sup>2</sup> Intrawell background data collected from 08/16/2016 through 09/03/2019.

CCR = coal combustion residual

mg/L = milligrams per liter

SSI = statistically significant increase

SU = standard unit

UPL = upper prediction limit



**ATTACHMENT 3**  
**Groundwater Potentiometric Maps**

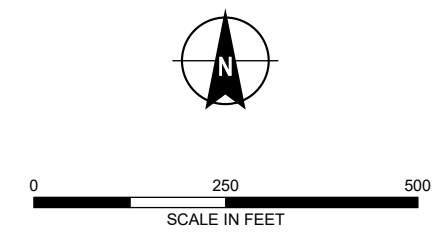


**LEGEND**

- MW-L** WELL NAME AND GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (AMSL), MARCH 2020
- 815.26** 815.26
- MONITORING WELL
- WATER QUALITY ONLY
- ESTIMATED GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION CONTOUR, 0.20-FT INTERVAL (AMSL)
- GROUNDWATER FLOW DIRECTION AND APPROXIMATE GROUNDWATER FLOW RATE (FEET/YEAR)
- 847 LANDFILL
- FUTURE 847 LANDFILL

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 10 MARCH 2020.
3. MW-35 WAS NOT INCLUDED IN THE DATA SET USED TO CREATE THE DISPLAYED GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION LINES.
4. THE GROUNDWATER FLOW RATE WAS APPROXIMATED USING THE HYDRAULIC GRADIENT CALCULATED FROM GROUNDWATER POTENTIOMETRIC ELEVATIONS MEASURED 10 MARCH 2020 AND THE CONDUCTIVITY VALUES AND EFFECTIVE POROSITY VALUES OBTAINED FROM SLUG TESTS COMPLETED APRIL 2016.
5. AERIAL IMAGERY SOURCE: ESRI, 04 MARCH 2020



EVERGY KANSAS CENTRAL, INC.  
LAWRENCE ENERGY CENTER  
LAWRENCE, KANSAS

847 LANDFILL  
GROUNDWATER POTENTIOMETRIC  
ELEVATION CONTOUR MAP  
MARCH 10, 2020



OCTOBER 2022

FIGURE 2

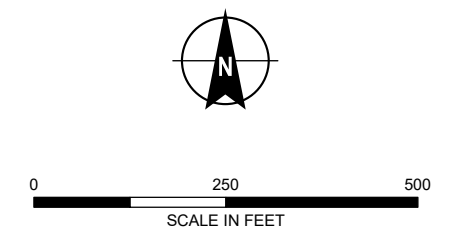


**LEGEND**

- MW-L** WELL NAME AND GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (AMSL), SEPTEMBER 2020
- 815.26**
- MONITORING WELL
- WATER QUALITY ONLY
- ESTIMATED GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION CONTOUR, 0.20-FT INTERVAL (AMSL)
- GROUNDWATER FLOW DIRECTION AND APPROXIMATE GROUNDWATER FLOW RATE (FEET/YEAR)
- 847 LANDFILL
- FUTURE 847 LANDFILL

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 15 SEPTEMBER 2020.
3. MW-35 WAS NOT INCLUDED IN THE DATA SET USED TO CREATE THE DISPLAYED GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION LINES.
4. THE GROUNDWATER FLOW RATE WAS APPROXIMATED USING THE HYDRAULIC GRADIENT CALCULATED FROM GROUNDWATER POTENTIOMETRIC ELEVATIONS MEASURED 15 SEPTEMBER 2020 AND THE CONDUCTIVITY VALUES AND EFFECTIVE POROSITY VALUES OBTAINED FROM SLUG TESTS COMPLETED APRIL 2016.
5. AERIAL IMAGERY SOURCE: ESRI, 04 MARCH 2020



EVERGY KANSAS CENTRAL, INC.  
LAWRENCE ENERGY CENTER  
LAWRENCE, KANSAS

847 LANDFILL  
GROUNDWATER POTENTIOMETRIC  
ELEVATION CONTOUR MAP  
SEPTEMBER 15, 2020



OCTOBER 2022