



I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

12/06/2022

Jared Morrison
Director Environmental Services
Evergy, Inc.

Date

TECHNICAL MEMORANDUM

August 11, 2020
 Amended: December 5, 2022
 File No. 129778-039



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

FROM: Haley & Aldrich, Inc.
 Steven F. Putrich, P.E., Principal Consultant
 Mark Nicholls, P.G., Hydrogeologist

SUBJECT: Groundwater Monitoring Concentrations Evaluation and Certification
 40 CFR 257.102 (c) Closure by Removal of CCR
 Tecumseh Energy Center
 Bottom Ash Settling Area

Evergy Kansas Central, Inc. (Evergy) operates the Tecumseh Energy Center (TEC) Bottom Ash Settling Area (BASA), which is an existing coal combustion residuals (CCR) management unit. The TEC BASA is subject to the U.S. Environmental Protection Agency Federal CCR Rule Title 40 Code of Federal Regulations §§ 257 and 261 (Rule) effective October 19, 2015, including subsequent rulemaking revisions. The CCR Rule establishes requirements for the operation, maintenance, and closure of CCR landfills and surface impoundments. The purpose of this document was to address the groundwater requirements for closure by removal of CCR at the TEC BASA in accordance with § 257.102(c) which served as certification that the unit met the groundwater requirements for closure of a CCR surface impoundment. Pursuant to Paragraph 10.a. of the Consent Agreement and Final Order In the Matter of Evergy Kansas Central, Inc.: Docket No. RCRA-07-2023-0001 dated November 7, 2022, this TEC BASA surface impoundment certification has been reopened for further assessment monitoring and nature and extent investigation of previous statistically significant levels of arsenic and cobalt. This certification is pending this further monitoring and investigation.

Revision No.	Date	Notes
0	August 11, 2020	Original
1	December 5, 2022	Amended to reopen in accordance with Paragraph 10.a. of the Consent Agreement and Final Order In the Matter of Evergy Kansas Central, Inc.: Docket No. RCRA-07-2023-0001 dated November 7, 2022