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TECHNICAL MEMORANDUM

September 10, 2021
File No. 129778-043

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

FROM: Haley & Aldrich, Inc.
Steven F. Putrich, P.E., Principal Consultant
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SUBJECT: Semi-Annual Remedy Selection Progress Report Pursuant to 40 CFR § 257.97(a)
Lawrence Energy Center
Area 2 Pond, Area 3 Pond, and Area 4 Pond (inactive)

Evergy Kansas Central, Inc. (Evergy) has implemented the U.S. Environmental Protection Agency Federal Coal Combustion Residuals (CCR) Rule (Code of Federal Regulations Title 40 [40 CFR] §§ 257 and 261) effective October 19, 2015, along with subsequent revisions for the inactive CCR surface impoundments referred to as Area 2 Pond, Area 3 Pond, and Area 4 Pond (inactive units; collectively, inactive Ash Ponds) at the Lawrence Energy Center located in Lawrence, Kansas. Section 257.97(a) of the CCR Rule requires that the owner or operator of a CCR management unit which has completed a Corrective Measures Assessment (CMA) for groundwater to prepare a semi-annual report describing the progress in selecting and designing the remedy. This report constitutes the first semi-annual remedy selection progress report and is comprised of activities during the period of March 2021 through August 2021.

The CMA was initiated for the inactive Ash Ponds on October 12, 2020 in response to statistically significant levels of Appendix IV constituents (arsenic, lithium, and molybdenum) exceeding Groundwater Protection Standards (GWPS). Pursuant to 40 CFR § 257.96(a), a demonstration of need for a 60-day extension for the assessment of corrective measures was completed on January 11, 2021. The CMA Report was completed and placed in the facility operating record and posted to Evergy's CCR public website on March 11, 2021. Based on the results of the CMA, Evergy must, as soon as feasible in accordance with the CCR Rule, select a remedy that meets the standards listed in 40 CFR § 257.97(b). A summary of the progress in selecting a remedy in compliance with the CCR Rule is provided below.

SUMMARY OF ACTIONS

The following actions have been completed during this initial reporting period (March 2021 through August 2021):

- Continued nature and extent (N&E) investigation of the Appendix IV constituents (arsenic, lithium, and molybdenum) in exceedance of the CCR Unit's GWPS pursuant to § 257.95(g). To properly determine the locations of supplemental groundwater monitoring wells, Evergy needed to evaluate the data collected from the initial four monitoring wells installed downgradient from the inactive Ash Ponds, on Evergy property, in January 2021. Following this evaluation, Evergy negotiated and obtained access agreements from neighboring landowners to gain the ability to install supplemental wells in support of the N&E investigation. Six additional groundwater monitoring wells were installed to assist with collecting additional groundwater data to define the N&E. Groundwater characterization of the N&E groundwater monitoring wells is ongoing.
- Groundwater sampling and analyses and aquifer testing at newly installed groundwater monitoring wells to provide additional information to support and/or refine the conceptual site model and associated groundwater modeling.
- Continued removal of interior and exterior berms and regrading of the surface elevations in support of future positive drainage from the former ponds site.

Anticipated activities for the upcoming semi-annual corrective measures selection progress period (September 2021 through February 2022) include the following (subject to change):

- Continued efforts to establish N&E:
 - Evaluate the groundwater analytical data collected during the September 2021 semi-annual sampling event that will include the N&E monitoring wells; and
 - Continue development of remaining geochemical evaluations.
- Continue evaluation of regulatory requirements listed under § 257.97 in support of selecting a remedy, including updated timelines and required demonstration elements.
- Provide a semi-annual progress report that summarizes Evergy's progress and status regarding a selection of remedy.