

**2018-2019 ANNUAL GROUNDWATER MONITORING
AND
CORRECTIVE ACTION REPORT**

**ASH IMPOUNDMENT
IATAN GENERATING STATION
IATAN, MISSOURI**

Presented To:

Kansas City Power & Light Company

Presented By:

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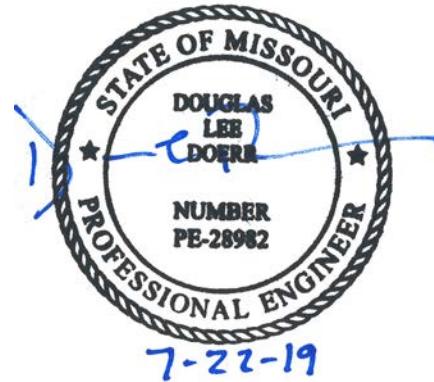
CERTIFICATIONS

I, John R. Rockhold, being a qualified groundwater scientist and Registered Geologist in the State of Missouri, do hereby certify that the 2018-2019 Annual Groundwater Monitoring and Corrective Action Report for the Ash Impoundment at the Iatan Generating Station was prepared by me or under my direct supervision and fulfills the requirements of 40 CFR 257.90(e).



John R. Rockhold, R.G.
SCS Engineers

I, Douglas L. Doerr, being a qualified licensed Professional Engineer in the State of Missouri, do hereby certify that the 2018-2019 Annual Groundwater Monitoring and Corrective Action Report for the Ash Impoundment at the Iatan Generating Station was prepared by me or under my direct supervision and fulfills the requirements of 40 CFR 257.90(e).



Douglas L. Doerr, P.E.
SCS Engineers

Revision Number	Revision Date	Revision Section	Summary of Revisions

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1 INTRODUCTION

This 2018-2019 Annual Groundwater Monitoring and Corrective Action Report was prepared to support compliance with the groundwater monitoring requirements of the “Coal Combustion Residuals (CCR) Final Rule” (Rule) published by the United States Environmental Protection Agency (USEPA) in the *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule*, dated April 17, 2015 (USEPA, 2015), update published August 5, 2016 (“Extension Rule) to provide an extension of compliance deadlines for certain inactive surface impoundments. The Ash Impoundment is classified as an “inactive” CCR unit and is therefore regulated by the August 5, 2016 update to the Rule subject to the new 40 CFR 257.100(e). Owners and operators of inactive CCR surface impoundments subject to the provisions of the new 40 CFR 257.100(e)(5)(ii) are required to prepare an annual groundwater monitoring and corrective action report no later than August 1, 2019 per 40 CFR 257.90(e).

Specifically, this report was prepared to fulfill the requirements of 40 CFR 257.90(e). Changes to the text of 40 CFR 257.90(e) to indicate the update subject to the new 40 CFR 257.100(e) are shown in [brackets] and specific reference to active CCR unit or expansions have been deleted. The applicable sections of the Rule are provided below in *italics*, followed by applicable information relative to the 2018-2019 Annual Groundwater Monitoring and Corrective Action Report for the Ash Impoundment at the Iatan Generating Station.

2 § 257.90(e) ANNUAL REPORT REQUIREMENTS

Annual groundwater monitoring and corrective action report. For [inactive] CCR surface impoundments, no later than [August 1, 2019], and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For [inactive] CCR surface impoundments, the owner or operator must prepare the initial annual groundwater monitoring and corrective action report no later than [August 1] of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by this subpart, and annually thereafter. For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. For purposes of this section, the owner or operator has prepared the annual report when the report is placed in the facility’s operating record as required by § 257.105(h)(1). At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:

2.1 § 257.90(e)(1) SITE MAP

A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;

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

2.2 § 257.90(e)(2) MONITORING SYSTEM CHANGES

Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;

The monitoring wells were installed as part of the CCR groundwater monitoring program for the Ash Impoundment in January 2018 and initially certified on April 16, 2019. However, due to the historic Missouri River flooding that began in March 2019, monitoring well MW-106 was found to have been destroyed in April 2019. SCS Engineers completed an evaluation that concluded this CCR unit groundwater monitoring system meets the requirements of 40 CFR 257.91 without MW-106 and therefore may be certified in accordance with 40 CFR 257.91(f). Therefore, the CCR groundwater monitoring system was re-certified to meet the requirements of 40 CFR 257.91 on May 8, 2019.

2.3 § 257.90(e)(3) SUMMARY OF SAMPLING EVENTS

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

Only detection monitoring was conducted during the reporting period. Background sampling for the detection monitoring program began in February 2018. Samples were analyzed as indicated in **Appendix B, Table 1** (Appendix III and Appendix IV Detection Monitoring Results) and **Table 2** (Detection Monitoring Field Measurements). The dates of sample collection and the results of the analyses are also provided in these tables.

2.4 § 257.90(e)(4) MONITORING TRANSITION NARRATIVE

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

There was no transition between monitoring programs in 2018-2019. Only detection monitoring was conducted in 2018-2019. Statistical evaluation of the data was still in process as of June 30, 2019.

2.5 § 257.90(e)(5) OTHER REQUIREMENTS

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

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

2.5.1 § 257.90(e)

Status of Groundwater Monitoring and Corrective Action Program.

The groundwater monitoring and corrective action program is in detection monitoring.

Summary of Key Actions Completed.

Collection of initial background groundwater quality data was completed and the initial detection monitoring sampling and analysis event was completed on April 29, 2019. The first verification sampling was conducted per the certified statistical method on May 20, 2019.

Description of Any Problems Encountered.

The initial detection monitoring sampling event was scheduled for March 2019; however, the historic flooding of the Missouri River prevented the sampling event until flood waters receded and the sampling event was performed April 29, 2019.

Discussion of Actions to Resolve the Problems.

The initial detection monitoring sampling event was performed April 29, 2019 after the Missouri River flood waters receded.

Projection of Key Activities for the Upcoming Year (2019-2020).

Completion of verification sampling and statistical evaluation of the Spring 2019 detection monitoring data. Semiannual Fall 2019 and Semiannual Spring 2020 groundwater sampling and analysis and, if required, alternative source demonstration(s) .

2.5.2 § 257.94(d)(3)

Demonstration providing the basis for an alternative monitoring frequency for detection monitoring and certification that it meets the requirements of this section.

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

2.5.3 § 257.94(e)(2)

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

Not applicable because no such demonstration was conducted.

2.5.4 § 257.95(c)(3)

Demonstration providing the basis for an alternative monitoring frequency for assessment monitoring and certification that it meets the requirements of this section.

Not applicable because no such demonstration was conducted.

2.5.5 § 257.95(d)(3)

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

Not applicable because there was no assessment monitoring conducted.

2.5.6 § 257.95(g)(3)(ii)

Demonstration that an alternative source other than the CCR unit caused the contamination, or that the SSI (during assessment monitoring) resulted from an error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. In addition, certification of the demonstration is to be included in the annual report.

Not applicable because no such demonstration was conducted.

2.5.7 § 257.96(a)

Demonstration of the need for additional time to complete the assessment of corrective measures due to site-specific conditions or circumstances. In addition, certification of the demonstration is to be included in the annual report.

Not applicable because no such demonstration was conducted.

3 GENERAL COMMENTS

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

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

APPENDIX A

FIGURES

Figure 1: Site Map



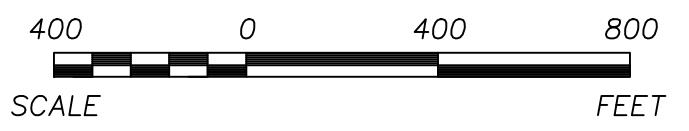
LEGEND:

● MW-109 MONITORING WELL

NOTES:

1. HORIZONTAL DATUM: MISSOURI STATE PLANE COORDINATE SYSTEM, WEST ZONE (NAD 83)
2. VERTICAL DATUM: NAVD 88
3. GOOGLE EARTH IMAGE DATED JUNE 10, 2016.
4. MONITOR WELL LOCATIONS ARE APPROXIMATE.
5. * - WELL WAS DESTROYED IN HISTORIC RIVER FLOODING OF MARCH 2019.

SCS ENGINEERS	CLIENT KANSAS CITY POWER & LIGHT COMPANY IATAN GENERATING STATION WESTON, MISSOURI	SHEET TITLE ASH IMPOUNDMENT	SITE MAP ASH IMPOUNDMENT	REV. DATE △ -	CK BY - / - / -
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APPENDIX B

TABLES

Table 1: Appendix III and Appendix IV Detection Monitoring Results

Table 2: Detection Monitoring Field Measurements

