

2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

CCR LANDFILL MONTROSE GENERATING STATION CLINTON, MISSOURI

Presented To:
Eversource Energy, Inc.

SCS ENGINEERS

27213168.21 | January 2022

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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 2021 Annual Groundwater Monitoring and Corrective Action Report for the CCR Landfill at the Montrose 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 2021 Annual Groundwater Monitoring and Corrective Action Report for the CCR Landfill at the Montrose 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

2021 Groundwater Monitoring and Corrective Action Report

Revision Number	Revision Date	Revision Section	Summary of Revisions

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1 INTRODUCTION

This 2021 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), and subsequent revisions. Specifically, this report was prepared for Evergy Metro, Inc. (Evergy) to fulfill the requirements of 40 CFR 257.90 (e). The applicable sections of the Rule are provided below in *italics*, followed by applicable information relative to the 2021 Annual Groundwater Monitoring and Corrective Action Report for the CCR Landfill at the Montrose Generating Station.

1.1 § 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 § 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, 2021), the CCR Landfill was operating under a detection monitoring program in compliance with § 257.94.

1.1.2 § 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, 2021), the CCR Landfill was operating under a detection monitoring program in compliance with § 257.94.

1.1.3 § 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):

(A) Identify those constituents listed in Appendix III to this part and the names of the monitoring wells associated with such an increase; and

Monitoring Event	Monitoring Well	Constituent	ASD
Fall 2020	MW-605	Chloride	Successful

(B) Provide the date when the assessment monitoring program was initiated for the CCR unit.

Not applicable because an assessment monitoring program was not initiated.

1.1.4 § 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:

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

Not applicable because there was no assessment monitoring conducted.

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

Not applicable because there was no assessment of corrective measures initiated for the CCR Unit.

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

Not applicable because there was no assessment of corrective measures initiated for the CCR Unit.

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

Not applicable because there was no assessment of corrective measures initiated for the CCR Unit.

1.1.5 § 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

Not applicable because corrective measures are not required.

1.1.6 § 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.

Not applicable because corrective measures are not required.

2 § 257.90(E) ANNUAL REPORT REQUIREMENTS

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). 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 CCR Landfill and all background (or upgradient) and downgradient monitoring wells with identification numbers for the CCR Landfill 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;

No new monitoring wells were installed and no wells were decommissioned as part of the CCR groundwater monitoring program for the CCR Landfill in 2021.

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 required to be conducted during the reporting period (2021). Samples collected in 2021 were collected and analyzed for Appendix III detection monitoring constituents. Results of the sampling events are provided in **Appendix B, Table 1** (Appendix III Detection Monitoring Results), and **Table 2** (Detection Monitoring Field Measurements). These tables include the Fall 2020 semiannual detection monitoring event verification sample data collected and analyzed in 2021; the Spring 2021 semiannual detection monitoring data, and verification sample data; and, the Fall 2021 semiannual detection monitoring data. The dates of sample collection and the monitoring program requiring the sample 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 2020. Only detection monitoring was conducted in 2021.

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) Program Status

Status of Groundwater Monitoring and Corrective Action Program.

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

Summary of Key Actions Completed.

- a. completion of the Fall 2020 verification sampling and analyses per the certified statistical method,
- b. completion of the statistical evaluation of the Fall 2020 semiannual detection monitoring sampling and analysis event per the certified statistical method,
- c. completion of the 2020 Annual Groundwater Monitoring and Corrective Action Report,
- d. completion of a successful alternative source demonstration for the Fall 2020 semiannual detection monitoring sampling and analysis event,
- e. completion of the Spring 2021 semiannual detection monitoring sampling and analysis event with subsequent verification sampling per the certified statistical method,
- f. completion of the statistical evaluation of the Spring 2021 semiannual detection monitoring sampling and analysis event per the certified statistical method, and
- g. initiation of the Fall 2021 semiannual detection monitoring sampling and analysis event.

Description of Any Problems Encountered.

No noteworthy problems were encountered.

Discussion of Actions to Resolve the Problems.

Not applicable because no noteworthy problems were encountered.

Projection of Key Activities for the Upcoming Year (2022).

Completion of verification sampling and data analysis, and the statistical evaluation of Fall 2021 detection monitoring sampling and analysis event, and, if required, alternative source demonstration(s). Semiannual Spring and Fall 2022 groundwater sampling and analysis. Completion of the statistical evaluation of the Spring 2022 detection monitoring sampling and analysis event, and, if required, alternative source demonstration(s).

2.5.2 § 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).

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

2.5.3 § 257.94(e)(2) Detection Monitoring Alternate Source Demonstration

Demonstration that a source other than the CCR unit caused the statistically significant increase (SSI) over background levels for a constituent or that the SSI resulted from 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.

The following demonstration reports are included as **Appendix C**:

- C.1 CCR Landfill Groundwater Monitoring Alternative Source Demonstration Report
November 2020 Groundwater Monitoring Event, CCR Landfill, Montrose Generating Station (May 2021).

2.5.4 § 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 the approval from EPA where EPA is the permitting authority in the annual groundwater monitoring and corrective action report required by § 257.90(e).

Not applicable because there was no assessment monitoring conducted.

2.5.5 § 257.95(d)(3) Assessment Monitoring Concentrations and Groundwater Protection Standards

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) 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. 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.

Not applicable because there was no assessment monitoring conducted.

2.5.7 § 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 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.

Not applicable because there was no assessment monitoring conducted.

2.6 § 257.90(E)(6) OVERVIEW 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.

§ 257.90(e)(6) is addressed in Section 1.1 of this report.

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 Montrose 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 Evergy Metro, Inc. for specific application to the Montrose Generating Station CCR Landfill. No warranties, express or implied, are intended or made.

APPENDIX A

FIGURES

Figure 1: Site Map

Figure 2: Potentiometric Surface Map (May 2021)

Figure 3: Potentiometric Surface Map (November 2021)

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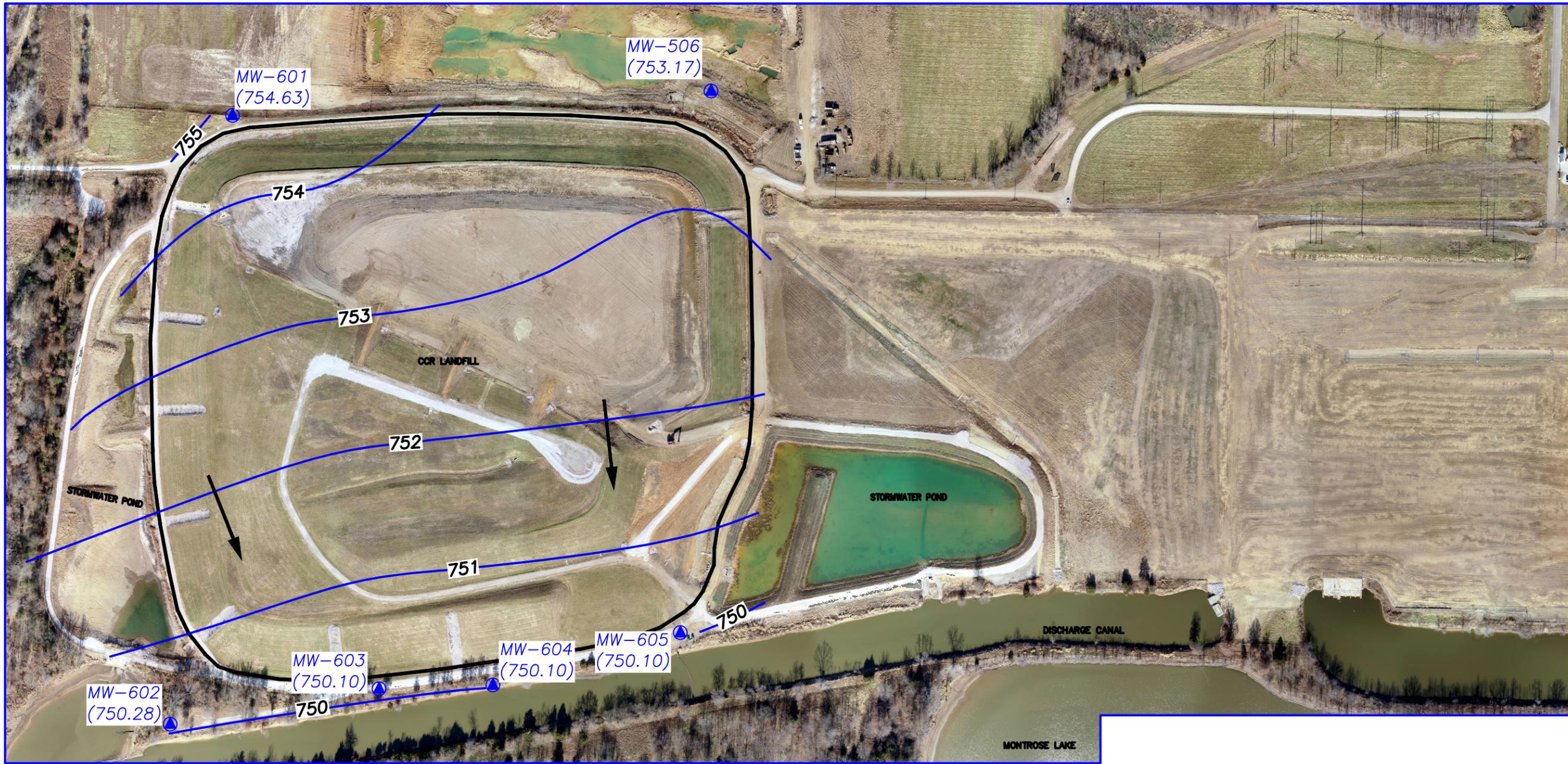


LEGEND:
 — CCR LANDFILL UNIT BOUNDARY (APPROXIMATE)
 ● MW-506 CCR GROUNDWATER MONITORING WELL SYSTEM

- NOTES:**
1. HORIZONTAL DATUM: MISSOURI STATE PLANE COORDINATE SYSTEM, WEST ZONE (NAD 83)
 2. VERTICAL DATUM: NAVD 88
 3. DRONE IMAGE BY EVERGY, DATED DECEMBER 3, 2021.
 4. APPROXIMATE BOUNDARY LOCATIONS PROVIDED BY AECOM.
 5. MONITOR WELL LOCATIONS PROVIDED BY SHAFFER, KLINE, & WARREN SURVEY DATED JULY 21, 2017.



SCS ENGINEERS ENVIRONMENTAL CONSULTANTS AND CONTRACTORS 8575 W. 110th St. Ste. 100 Overland Park, Kansas 66210 PH. (913) 881-0030 FAX. (913) 881-0012 PROJ. NO. 2721.131.68.21 DATE: 1/24/2022	CLIENT EVERGY METRO, INC. MONTROSE GENERATING STATION MONTROSE, MISSOURI	SHEET TITLE SITE MAP CCR LANDFILL CCR GROUNDWATER MONITORING SYSTEM	CK BY — — — — —
	PROJECT TITLE 2020 GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT	REV. DATE — — — — —	DATE 1/24/2022



LEGEND:

-  CCR LANDFILL UNIT BOUNDARY (APPROXIMATE)
-  MW-506 (747.77)
CCR GROUNDWATER MONITORING WELL SYSTEM
-  GROUNDWATER POTENTIOMETRIC SURFACE ELEVATIONS (REPRESENTATIVE OF THIS UNIT)
-  GROUNDWATER FLOW DIRECTION

NOTES:

1. HORIZONTAL DATUM: MISSOURI STATE PLANE COORDINATE SYSTEM, WEST ZONE (NAD 83)
2. VERTICAL DATUM: NAVD 88
3. DRONE IMAGE BY EVERGY, DATED DECEMBER 3, 2021.
4. APPROXIMATE BOUNDARY LOCATIONS PROVIDED BY AECOM.
5. MONITOR WELL LOCATIONS PROVIDED BY SHAFFER, KLINE, & WARREN SURVEY DATED JULY 21, 2017.



REV.	DATE	CK. BY
1		
2		
3		
4		
5		

SHEET TITLE
POTENTIOMETRIC SURFACE MAP (MAY 2021)

PROJECT TITLE
MONTROSE GROUNDWATER 2021

CLIENT
**EVERGY METRO, INC.
MONTROSE GENERATING STATION
MONTROSE, MISSOURI**

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ENVIRONMENTAL CONSULTANTS AND CONTRACTORS
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PROJ. NO. 27213188-20
DWN. BY: ALR
CHK. BY: JRR
C/A RW BY: JRR
PROJ. MGR. JRR

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DATE:
1/14/2021

FIGURE NO.
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APPENDIX B

TABLES

Table 1: Appendix III Detection Monitoring Results

Table 2: Detection Monitoring Field Measurements

Table 1
CCR Landfill
Appendix III Detection Monitoring Results
Evergy Montrose Generating Station

Well Number	Sample Date	Appendix III Constituents						Total Dissolved Solids (mg/L)
		Boron (mg/L)	Calcium (mg/L)	Chloride (mg/L)	Fluoride (mg/L)	pH (S.U.)	Sulfate (mg/L)	
MW-506	5/18/2021	<0.200	375	91.3	<0.150	5.73	1880	2800
MW-506	11/16/2021	<0.200	353	86.3	<0.150	5.53	1590	2670
MW-601	5/18/2021	<0.200	466	48.6	0.439	5.56	3200	4650
MW-601	11/16/2021	<0.200	460	36.6	0.384	5.30	3030	3710
MW-602	5/17/2021	4.17	311	3.95	<0.150	5.76	1190	1730
MW-602	11/16/2021	4.09	292	3.65	<0.150	5.82	1170	1690
MW-603	5/17/2021	6.22	403	6.17	0.535	4.60	2130	2600
MW-603	11/16/2021	5.25	370	5.53	0.540	4.37	1860	2290
MW-604	5/17/2021	5.32	486	15.6	0.491	5.98	2090	2960
MW-604	7/19/2021	---	*432	*14.7	---	**5.69	---	---
MW-604	11/16/2021	5.92	472	16.3	0.425	5.66	1940	2710
MW-605	2/3/2021	---	---	*59.3	---	**5.66	---	---
MW-605	3/1/2021	---	---	*58.2	---	**5.96	---	---
MW-605	5/17/2021	1.54	420	52.5	0.216	5.36	2040	2770
MW-605	11/16/2021	1.63	435	46.6	0.212	5.44	1850	2410

* Verification Sample obtained per certified statistical method and Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance, March 2009.

**Extra Sample for Quality Control Validation or per Standard Sampling Procedure

mg/L - milligrams per liter

pCi/L - picocuries per liter

S.U. - Standard Units

--- Not Sampled

Table 2
CCR Landfill
Detection Monitoring Field Measurements
Every Montrose Generating Station

Well Number	Sample Date	pH (S.U.)	Specific Conductivity (µS)	Temperature (°C)	Turbidity (NTU)	ORP (mV)	DO (mg/L)	Water Level (ft btoc)	Groundwater Elevation (ft NGVD)
MW-506	5/18/2021	5.73	2770	20.43	20.4	243	0.33	8.40	753.17
MW-506	11/16/2021	5.53	3140	18.76	0.0	237	0.00	13.60	747.97
MW-601	5/18/2021	5.56	4160	17.82	32.5	223	6.96	10.48	754.63
MW-601	11/16/2021	5.30	4610	17.67	7.7	245	0.00	14.19	750.92
MW-602	5/17/2021	5.76	2090	15.89	43.4	42	0.00	5.58	750.28
MW-602	11/16/2021	5.82	2020	16.44	26.4	55	0.00	6.98	748.88
MW-603	5/17/2021	4.60	3250	15.69	0.0	340	0.00	13.54	750.10
MW-603	11/16/2021	4.37	2990	19.06	0.0	385	0.00	14.42	749.22
MW-604	5/17/2021	5.98	3120	15.92	1.9	192	4.71	13.29	750.10
MW-604	7/19/2021	**5.69	3000	16.73	2.2	183	0.00	10.93	752.46
MW-604	11/16/2021	5.66	3320	16.93	0.0	268	0.00	14.20	749.19
MW-605	2/3/2021	**5.66	2690	13.16	13.8	163	0.80	13.43	750.68
MW-605	3/1/2021	**5.96	3100	13.86	46.2	181	1.95	13.19	750.92
MW-605	5/17/2021	5.36	3240	16.66	0.0	252	0.00	14.01	750.10
MW-605	11/16/2021	5.44	3170	19.08	0.0	246	0.00	14.72	749.39

* Verification Sample obtained per certified statistical method and Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance, March 2009.

**Extra Sample for Quality Control Validation or per Standard Sampling Procedure

S.U. - Standard Units

µS - microsiemens

°C - Degrees Celsius

ft btoc - Feet Below Top of Casing

ft NGVD - National Geodetic Vertical Datum (NAVD 88)

NTU - Nephelometric Turbidity Unit

APPENDIX C

ALTERNATIVE SOURCE DEMONSTRATIONS

C.1 CCR Landfill Groundwater Monitoring Alternative Source Demonstration Report November 2020 Groundwater Monitoring Event, CCR Landfill, Montrose Generating Station (May 2021)

C.1 CCR Landfill Groundwater Monitoring Alternative Source
Demonstration Report November 2020 Groundwater Monitoring
Event, CCR Landfill, Montrose Generating Station (May 2021)

CCR GROUNDWATER MONITORING
ALTERNATIVE SOURCE DEMONSTRATION REPORT
NOVEMBER 2020 GROUNDWATER MONITORING EVENT

CCR LANDFILL

Montrose Generating Station
Evergy Metro, Inc.
Clinton, Missouri

SCS ENGINEERS

May 2021
File No. 27213168.20

8575 W. 110th Suite 100
Overland Park, KS 66210
913-749-0700

CERTIFICATIONS

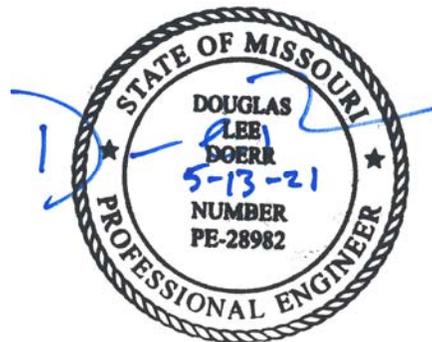
I, John R. Rockhold, being a qualified groundwater scientist and Registered Geologist in the State of Missouri, do hereby certify the accuracy of the information in the CCR Groundwater Monitoring Alternative Source Demonstration Report for the CCR Landfill at the Montrose Generating Station. The Alternative Source Demonstration was prepared by me or under my direct supervision in accordance with generally accepted hydrogeological practices and the local standard of care.



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 the accuracy of the information in the CCR Groundwater Monitoring Alternative Source Demonstration Report for the CCR Landfill at the Montrose Generating Station. The Alternative Source Demonstration was prepared by me or under my direct supervision in accordance with generally accepted engineering practices and the local standard of care.



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SCS Engineers

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Appendices

- Appendix A Box and Whiskers Plots**
- Appendix B Piper Diagram Plots and Analytical Results**
- Appendix C Time Series Plot**

1 REGULATORY FRAMEWORK

Certain owners or operators of Coal Combustion Residuals (CCR) units are required to complete groundwater monitoring activities to evaluate whether a release from the unit has occurred. Included in the activities is the completion of a statistical analysis of the groundwater quality data as prescribed in § 257.93(h) of the CCR Final Rule. If the initial analysis indicates a statistically significant increase (SSI) over background levels, the owner or operator may perform an alternative source demonstration (ASD). In accordance with § 257.94(e)(2), the owner or operator of the CCR unit may demonstrate that a source other than the CCR unit caused the SSI over background levels for a constituent, or that the SSI 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 SSI over background levels to include obtaining a certification from a qualified professional engineer 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 § 257.94. 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.

2 STATISTICAL RESULTS

Statistical analysis of monitoring data from the groundwater monitoring system for the CCR Landfill at the Montrose Generating Station has been completed in substantial compliance with the “Statistical Method Certification by A Qualified Professional Engineer” dated October 12, 2017. Detection monitoring groundwater samples were collected on November 10, 2020. Review and validation of the results from the November 2020 Detection Monitoring Event was completed on December 22, 2020, which constitutes completion and finalization of detection monitoring laboratory analyses. A statistical analysis was then conducted to determine whether there was a statistically significant increase (SSI) over background values for each constituent listed in Appendix III to Part 257-Constituents for Detection Monitoring. Two rounds of verification sampling were conducted for certain constituents on February 3, 2021 and March 1, 2021.

The completed statistical evaluation identified one Appendix III constituent above the prediction limit established for monitoring well MW-605.

Constituent/Monitoring Well	*UPL	Observation November 10, 2020	1st Verification February 3, 2021	2nd Verification March 1, 2021
Chloride MW-605	55.57	59.7	59.3	58.2

*UPL – Upper Prediction Limit

Determination: A statistical evaluation was completed for all Appendix III detection monitoring constituents in accordance with the certified statistical method. The statistical evaluation identified a SSI above the background prediction limit for chloride at monitoring well MW-605.

3 ALTERNATIVE SOURCE DEMONSTRATION

An Alternative Source Demonstration (ASD) is a means to provide supporting lines of evidence that something other than a release from a regulated CCR unit caused an SSI. For the above identified SSI for the CCR Landfill at the Montrose Generating Station, there are multiple lines of supporting evidence to indicate the above SSI was not caused by a release from the CCR Landfill. Select multiple lines of supporting evidence are described as follows.

3.1 BOX AND WHISKERS PLOTS

A commonly accepted method to demonstrate and visualize the distribution of data in a given data set is to construct box and whiskers plots. The basic box plotted graphically locates the median, 25th and 75th percentiles of the data set; the "whiskers" extend to the minimum and maximum values of the data set. The range between the ends of a box plot represents the Interquartile Range, which can be used as an estimate of spread or variability. The mean is denoted by a "+".

When comparing multiple wells or well groups, box plots for each well can be lined up on the same axis to roughly compare the variability in each well. This may be used as an exploratory screening for the test of homogeneity of variance across multiple wells.

An SSI was identified in well MW-605 for chloride. Therefore, box and whiskers plots for chloride in MW-605 and the two upgradient wells MW-506 and MW-601 were prepared to allow comparison of the chloride concentrations between wells. The comparison between wells indicates the chloride concentrations in well MW-605 are within or below the range of chloride in upgradient wells. This demonstrates that a source other than the CCR Landfill caused the SSI in chloride over background levels, or that the SSI resulted from natural variation in groundwater quality. Box and whisker plots are provided in **Appendix A**.

3.2 PIPER DIAGRAM PLOTS

Piper diagrams are a form of tri-linear diagram, and a widely-accepted method to provide a visual representation of the ion concentration of groundwater. Piper diagrams portray water compositions and facilitate the interpretation and presentation of chemical analyses. They may be used to visually compare the chemical composition of water quality across wells, and aid in determining whether the waters are similar or dis-similar, and can over time indicate whether the waters are mixing.

A piper diagram has two triangular plots on the right and left side of a 4-sided center field. The three major cations are plotted in the left triangle and anions in the right. Each of the three cation/anion variables, in milliequivalents, is divided by the sum of the three values, to produce a percent of total cation/anions. These percentages determine the location of the associated symbol. The data points in the center field are located by extending the points in the lower triangles to the point of intersection. In order for a piper diagram to be produced, the selected data file must contain the following constituents: Sodium (Na), Potassium (K), Calcium (Ca), Magnesium (Mg), Chloride (Cl), Sulfate (SO₄), Carbonate (CO₃), and Bicarbonate (HCO₃).

A piper diagram generated for MW-605 and landfill leachate is provided in **Appendix B** along with the analytical results and indicates the groundwater from this well does not exhibit the same geochemical

characteristics as the leachate. The groundwater and the leachate plot in totally different hydrochemical facies indicating there is no mixing of the two types of water (groundwater and leachate). This demonstrates that a source other than the CCR Landfill caused the SSI over background levels for chloride or that the SSI resulted from natural variation in groundwater quality.

3.3 TIME SERIES PLOTS

Time series plots provide a graphical method to view changes in data at a particular well (monitoring point) or wells over time. Time series plots display the variability in concentration levels over time and can be used to indicate possible outliers or data errors. More than one well can be compared on the same plot to look for differences between wells. Non-detect data is plotted as censored data at one-half of the laboratory reporting limit. Time series plots can also be used to examine the data for trends.

Time series plots for the chloride concentrations in MW-605 were plotted along with the chloride concentrations for upgradient wells MW-506 and MW-601. The plots indicate the chloride concentrations in MW-605 are below the concentrations in MW-506 and are often below or very near the concentrations in MW-601. This demonstrates that a source other than the CCR Landfill caused the SSI over background levels, or that the SSI resulted from natural variation in groundwater quality. Time series plots are provided in **Appendix C**.

4 CONCLUSION

Our opinion is that a sufficient body of evidence is available and presented above to demonstrate that a source other than the CCR Landfill caused the SSI over background levels, or that the SSI resulted from natural variation in groundwater quality. Based on the successful ASD, the owner or operator of the CCR Landfill may continue with the detection monitoring program under § 257.94.

5 GENERAL COMMENTS

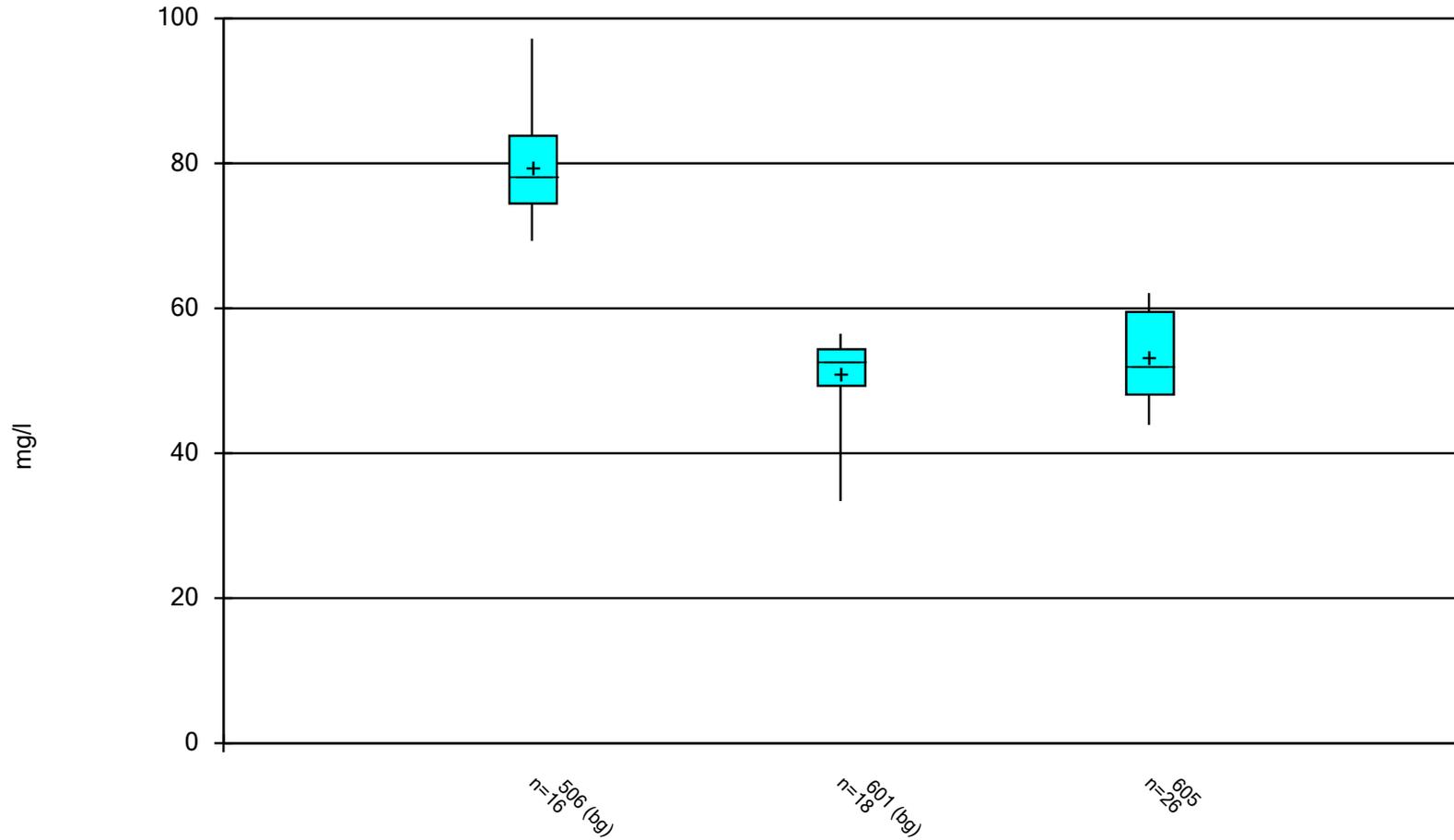
This report has been prepared and reviewed under the direction of a qualified groundwater scientist and qualified professional engineer. Please note that SCS Engineers does not warrant the work of regulatory agencies or other third parties supplying information used in the assimilation of this report. 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 Evergy Metro, Inc. for specific application to the Montrose Generating Station. No warranties, express or implied, are intended or made.

The signatures of the certifying registered geologist and professional engineer on this document represent that to the best of their knowledge, information, and belief in the exercise of their professional judgement in accordance with the standard of practice, it is their professional opinions that the aforementioned information is accurate as of the date of such signatures. Any opinion or decisions by them are made on the basis of their experience, qualifications, and professional judgement and are not to be construed as warranties or guaranties. In addition, opinions relating to regulatory, environmental, geologic, geochemical and geotechnical conditions interpretations or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

Appendix A

Box and Whiskers Plots

Box & Whiskers Plot



Constituent: Chloride Analysis Run 4/27/2021 4:28 PM View: LF CCR III
Montrose Generating Station UWL Client: SCS Engineers Data: Montrose

Box & Whiskers Plot

Montrose Generating Station UWL Client: SCS Engineers Data: Montrose Printed 4/27/2021, 4:33 PM

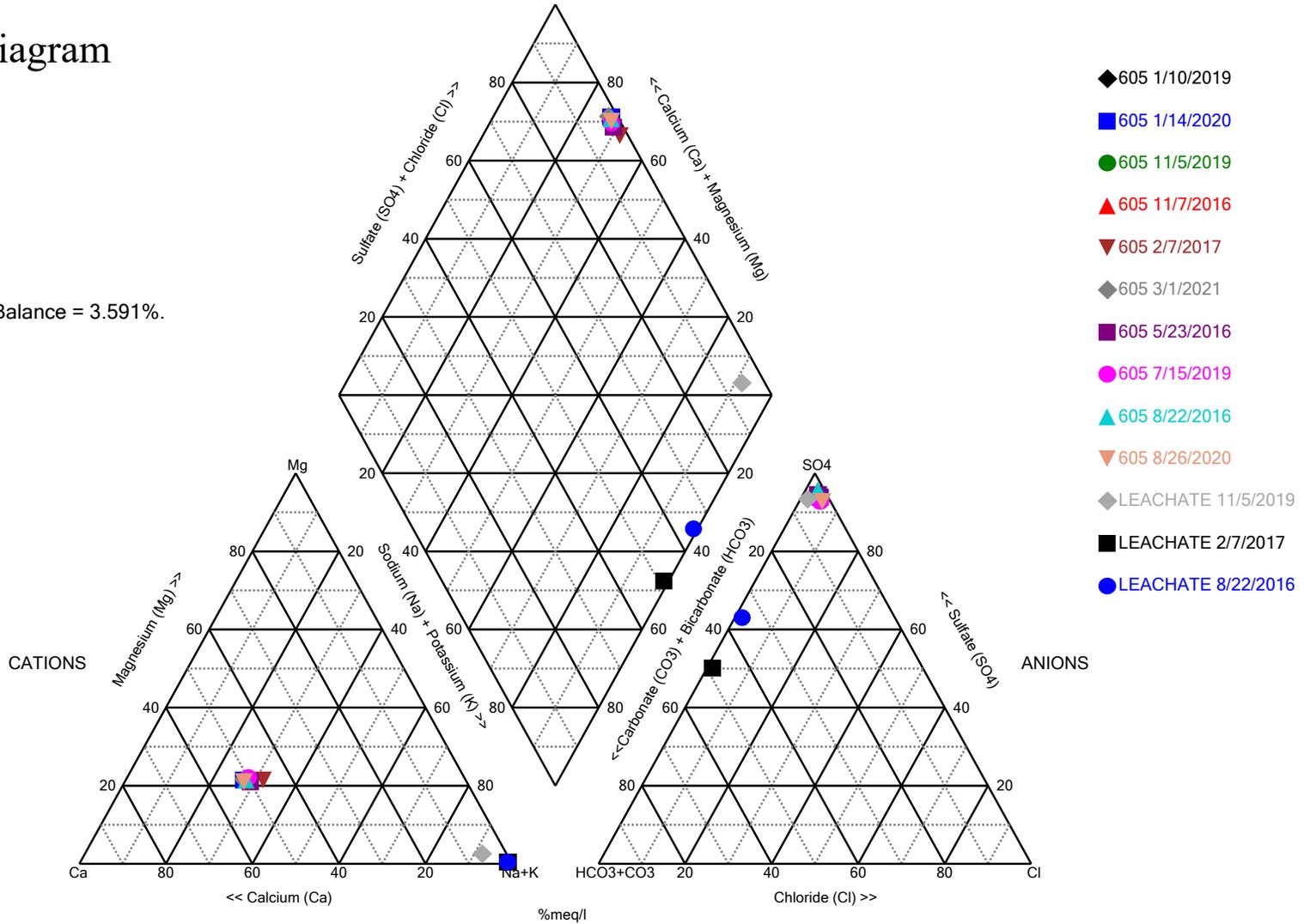
<u>Constituent</u>	<u>Well</u>	<u>N</u>	<u>Mean</u>	<u>Std. Dev.</u>	<u>Std. Err.</u>	<u>Median</u>	<u>Min.</u>	<u>Max.</u>	<u>%NDs</u>
Chloride (mg/l)	506 (bg)	16	79.59	7.387	1.847	78.35	69.3	97.2	0
Chloride (mg/l)	601 (bg)	18	51.09	5.255	1.239	52.6	33.4	56.5	0
Chloride (mg/l)	605	26	53.43	5.899	1.157	52.05	43.9	62.1	0

Appendix B

Piper Diagram Plots and Analytical Results

Piper Diagram

Cation-Anion Balance = 3.591%.



Analysis Run 4/27/2021 4:39 PM View: LF CCR III

Montrose Generating Station UWL Client: SCS Engineers Data: Montrose

Piper Diagram

Analysis Run 4/27/2021 4:42 PM View: LF CCR III

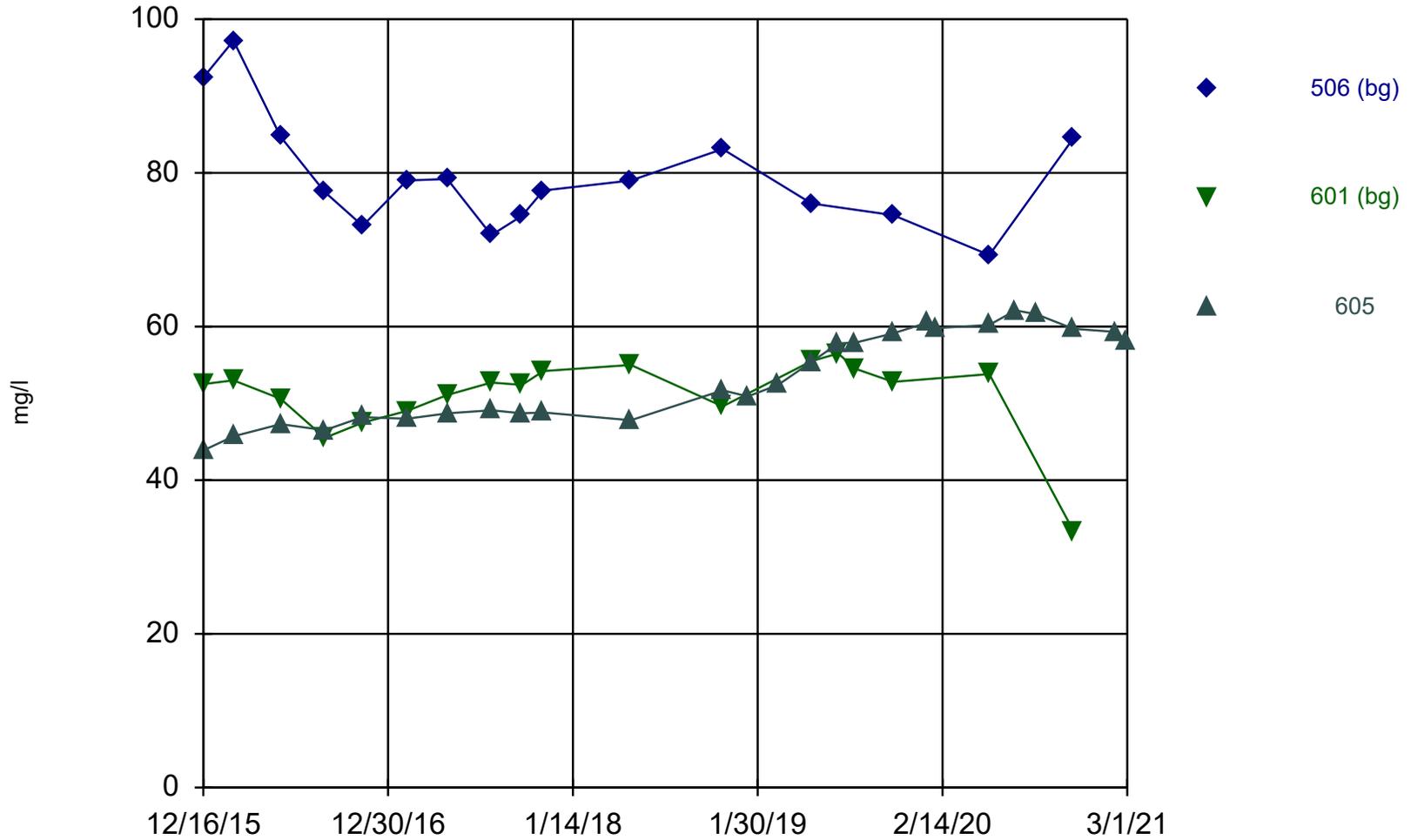
Montrose Generating Station UWL Client: SCS Engineers Data: Montrose

Totals (ppm)	Na	K	Ca	Mg	Cl	SO4	HCO3	CO3
605 5/23/2016	276	2.57	412	105	47.3	1880	47.9	10
605 8/22/2016	270	2.51	431	111	46.5	2230	40.9	10
605 11/7/2016	271	2.63	407	104	48.2	2280	44	10
605 2/7/2017	284	2.71	367	101	48	2050	48.1	10
605 1/10/2019	264	2.79	421	107	50.9	1870	42	10
605 7/15/2019	261	2.73	407	108	57.8	1640	41.6	10
605 11/5/2019	248	2.6	399	102	59.1	1730	42.8	10
605 1/14/2020	240	2.48	395	101	60.5	1860	38.1	10
605 8/26/2020	244	2.44	396	97.5	61.6	1690	36.8	10
605 3/1/2021	244	2.55	407	103	58.2	1720	40.1	10
LEACHATE 8/22/2016	1010	20.8	5.88	0.5	18.5	1560	10	549
LEACHATE 2/7/2017	1050	23.9	5.47	0.5	16.3	1360	10	840
LEACHATE 11/5/2019	970	17	49.2	14.5	20.3	2240	44.1	64.2

Appendix C

Time Series Plots

Time Series



Constituent: Chloride Analysis Run 4/27/2021 4:34 PM View: LF CCR III
Montrose Generating Station UWL Client: SCS Engineers Data: Montrose