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## TECHNICAL MEMORANDUM

December 10, 2019  
File No. 129778-029

TO: Evergy Kansas Central, Inc. (f/k/a Westar Energy, Inc.)  
Jared Morrison, Manager, Water and Waste Programs

FROM: Haley & Aldrich, Inc.  
Steven F. Putrich, P.E., Senior Associate – Engineering Principal  
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Mark Nicholls Digitally signed by Mark Nicholls  
Date: 2020.01.20 15:23:00 -0700

SUBJECT: March 2019 Semi-Annual Assessment Groundwater Monitoring  
Statistically Significant Level Notification and  
Alternate Source Demonstration Update  
Tecumseh Energy Center  
Bottom Ash Settling Area

Pursuant to Title 40 Code of Federal Regulations (40 CFR) § 257.95(g) this memorandum documents the results of statistical evaluations conducted to determine if Appendix IV groundwater monitoring constituents detected in wells downgradient of the Tecumseh Energy Center Bottom Ash Settling Area (BASA) are present at a statistically significant level (SSL) above groundwater protection standards (GWPS) consistent with the requirements in 40 CFR § 257.95. The results of the statistical evaluations completed on July 16, 2019 of the March 2019 assessment monitoring sampling event data for each analyte/well combination indicate SSLs above GWPS for arsenic at monitoring wells MW-9 and MW-10 and for cobalt at monitoring well MW-9.

Following identification of the SSL at the BASA, an evaluation was completed and a successful demonstration was made in accordance with 40 CFR § 257.95(g)(3)(ii) identifying that a source other than the coal combustion residuals unit caused the SSLs. As such, Evergy Kansas Central, Inc. will continue monitoring the BASA in accordance with the assessment monitoring program.