HALEY ALDRICH

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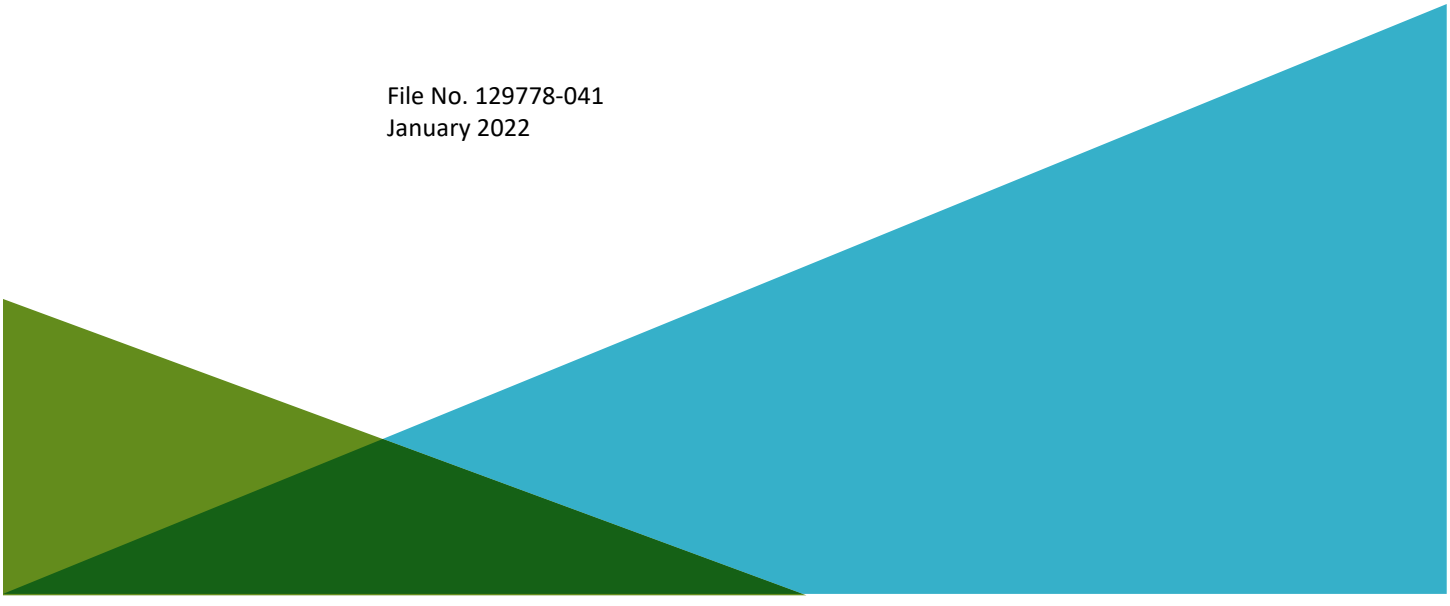
2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT
BOTTOM ASH SETTLING AREA/BOTTOM ASH LANDFILL
JEFFREY ENERGY CENTER
ST. MARYS, KANSAS

by
Haley & Aldrich, Inc.
Cleveland, Ohio

for
Evergy Kansas Central, Inc.
Topeka, Kansas

File No. 129778-041
January 2022



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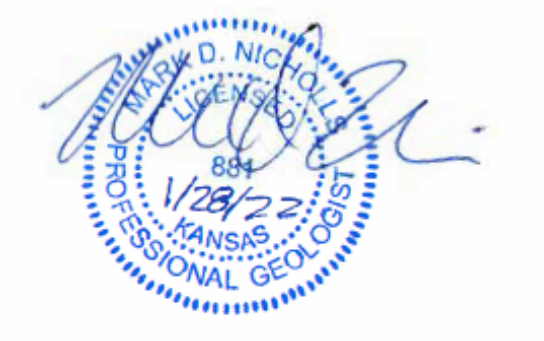
This Annual Groundwater Monitoring and Corrective Action Report documents the groundwater monitoring program for the Jeffrey Energy Center (JEC) Bottom Ash Settling Area/Bottom Ash Landfill (BASA/BAL) consistent with applicable sections of 257.90 through 257.98, and describes activities conducted in the prior calendar year (2021) and documents compliance with the U.S. Environmental Protection Agency Coal Combustion Residual Rule. I certify that the 2021 Annual Groundwater Monitoring and Corrective Action Report for the JEC BASA/BAL is, to the best of my knowledge, accurate and complete.

Signed:_____
Professional Geologist



Print Name:	Mark Nicholls
Kansas License No.:	Professional Geologist No. 881
Title:	Technical Expert 2
Company:	Haley & Aldrich, Inc.

1. Introduction

This 2021 Annual Groundwater Monitoring and Corrective Action Report (Annual Report) addresses the Bottom Ash Settling Area/Bottom Ash Landfill (BASA/BAL) at the Jeffrey Energy Center (JEC), operated by Evergy Kansas Central, Inc. (Evergy). This Annual Report was developed in accordance with the U.S. Environmental Protection Agency Coal Combustion Residual (CCR) Rule (Rule) effective October 19, 2015, including subsequent revisions, specifically Code of Federal Regulations Title 40 (40 CFR), subsection 257.90(e). The Annual Report documents the groundwater monitoring system for the BASA/BAL consistent with applicable sections of 257.90 through 257.98, and describes activities conducted in the prior calendar year (2021) and documents compliance with the Rule. The specific requirements for the Annual Report listed in § 257.90(e) of the Rule are provided in Sections 1 and 2 of this Annual Report and are in bold italic font, followed by a narrative describing how each Rule requirement has been met.

1.1 40 CFR § 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 40 CFR § 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 BASA/BAL was operating under a detection monitoring program in compliance with 40 CFR § 257.94.

1.1.2 40 CFR § 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 BASA/BAL was operating under a detection monitoring program in compliance with 40 CFR § 257.94.

1.1.3 40 CFR § 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):

1.1.3.1 40 CFR § 257.90(e)(6)(iii)(a)

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

No statistically significant increases (SSI) over background were identified during the previous calendar year (2021).

1.1.3.2 40 CFR § 257.90(e)(6)(iii)(b)

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

No SSIs over background were identified during the previous calendar year (2021); therefore, an assessment monitoring program was not initiated for the BASA/BAL in 2021.

1.1.4 40 CFR § 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:

1.1.4.1 40 CFR § 257.90(e)(6)(iv)(A) – Statistically Significant Level Constituents

Identify those constituents listed in appendix IV to this part and the names of the monitoring wells associated with such an increase;

The BASA/BAL remains in detection monitoring, and no appendix IV constituents were collected or analyzed in 2021. Therefore, no statistically significant levels above the groundwater protection standard were identified for the BASA/BAL.

1.1.4.2 40 CFR § 257.90(e)(6)(iv)(B) – Initiation of the Assessment of Corrective Measures

Provide the date when the assessment of corrective measures was initiated for the CCR unit;

No assessment of corrective measures was required to be initiated in 2021 for this unit. The BASA/BAL remained in detection monitoring during 2021.

1.1.4.3 40 CFR § 257.90(e)(6)(iv)(C) – Assessment of Corrective Measures Public Meeting

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

An assessment of corrective measures was not required for the BASA/BAL in 2021; therefore, a public meeting was not held.

1.1.4.4 40 CFR § 257.90(e)(6)(iv)(D) – Completion of the Assessment of Corrective Measures

Provide the date when the assessment of corrective measures was completed for the CCR unit.

No assessment of corrective measures was required to be initiated in 2021 for this unit. The BASA/BAL remained in detection monitoring during 2021.

1.1.5 40 CFR § 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

The BASA/BAL remains in detection monitoring, and no remedy was required to be selected.

1.1.6 40 CFR § 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.

No remedial activities were required in 2021.

2. 40 CFR § 257.90 Applicability

2.1 40 CFR § 257.90(a)

All CCR landfills, CCR surface impoundments, and lateral expansions of CCR units are subject to the groundwater monitoring and corrective action requirements under §§ 257.90 through 257.99, except as provided in paragraph (g) [Suspension of groundwater monitoring requirements] of this section.

Evergy has installed and certified a groundwater monitoring system at the JEC BASA/BAL. The BASA/BAL is a multi-unit system subject to the groundwater monitoring and corrective action requirements described under 40 CFR §§ 257.90 through 257.98. This document addresses the requirement for the Owner/Operator to prepare an Annual Report per § 257.90(e).

2.2 40 CFR § 257.90(e) – SUMMARY

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).

This Annual Report describes monitoring completed and actions taken for the groundwater monitoring system at the JEC BASA/BAL as required by the Rule. Groundwater sampling and analysis was conducted in accordance with requirements described in § 257.93, and the status of the groundwater monitoring program described in § 257.94 is provided in this report. This Annual Report documents the applicable groundwater-related activities completed in the calendar year 2021.

2.2.1 Status of the Groundwater Monitoring Program

The BASA/BAL remained in the detection monitoring program during 2021.

2.2.2 Key Actions Completed

The 2020 Annual Groundwater Monitoring and Corrective Action Report was completed in January 2021. Statistical evaluation was completed in January 2021 on analytical data from the September 2020 detection monitoring sampling event. Semi-annual detection monitoring

events were completed in March and September of 2021. Statistical evaluation was completed in July 2021 on analytical data from the March 2021 semi-annual detection monitoring sampling event. Statistical evaluation of the results from the September 2021 semi-annual detection monitoring sampling event are due to be completed in January 2022 and will be reported in the next annual report.

2.2.3 Problems Encountered

One problem encountered during groundwater monitoring activities in 2021 consisted of a laboratory analytical error that required the laboratory to reanalyze select analytical results. Calcium was reanalyzed for monitoring well MW-3 in the March 2021 semi-annual detection monitoring sampling event. The analytical result was revised accordingly. This was the only issue that needed to be addressed at the BASA/BAL in 2021.

2.2.4 Actions to Resolve Problems

The resolution to problems encountered in 2021 included additional laboratory analyses, as described above. The analytical results were revised accordingly. No other problems were encountered at the BASA/BAL in 2021; therefore, no actions to resolve problems were required.

2.2.5 Project Key Activities for Upcoming Year

Key activities planned for 2022 include completion of the 2021 Annual Groundwater Monitoring and Corrective Action Report, statistical evaluation of semi-annual detection monitoring analytical data collected in September 2021, and semi-annual detection monitoring and subsequent statistical evaluations.

2.3 40 CFR § 257.90(e) – INFORMATION

At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:

2.3.1 40 CFR § 257.90(e)(1)

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;

As required by § 257.90(e)(1), a map showing the locations of the CCR unit and associated upgradient and downgradient monitoring wells for the BASA/BAL is included in this report as Figure 1.

2.3.2 40 CFR § 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 monitoring wells were installed or decommissioned in 2021.

2.3.3 40 CFR § 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;

In accordance with § 257.94(b), two independent detection monitoring samples from each background and downgradient monitoring well were collected during 2021. A summary including the sample names, dates of sample collection, field parameters, and monitoring data obtained for the groundwater monitoring program for the BASA/BAL is presented in Table I of this report. Groundwater potentiometric elevation contour maps associated with each groundwater monitoring sampling event in 2021 are provided in Figures 2 and 3.

2.3.4 40 CFR § 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 2021. Only detection monitoring was conducted in 2021.

2.3.5 40 CFR § 257.90(e)(5) – Other Requirements

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

This Annual Report documents activities conducted to comply with § 257.90 through § 257.94 of the Rule. It is understood that there are supplemental references in § 257.90 through § 257.98 that must be placed in the Annual Report. The following requirements include relevant and required information in the Annual Report for the activities completed in calendar year 2021.

2.3.5.1 40 CFR § 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).

An alternative groundwater detection monitoring sampling and analysis frequency has not been established for this CCR unit; therefore, no demonstration or certification is applicable.

2.3.5.2 40 CFR § 257.94(e)(2) – Detection Monitoring Alternate Source Demonstration

The owner or operator may demonstrate that a source other than the CCR unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase 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 statistically significant increase over background levels to include obtaining a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority 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 this section. 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 or approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

No alternate source demonstration or certification was required in 2021; therefore, no demonstration or certification is applicable.

2.3.5.3 40 CFR § 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 approval from EPA where EPA is the permitting authority in the annual groundwater monitoring and corrective action report required by § 257.90(e).

The BASA/BAL remains in detection monitoring and an alternative groundwater assessment monitoring sampling and analysis frequency has not been established for this CCR unit; therefore, no demonstration or certification is applicable.

2.3.5.4 40 CFR § 257.95(d)(3) – Assessment Monitoring Concentrations and Groundwater Protection Standards

Include the recorded concentrations required by paragraph (d)(1) of this section, identify the background concentrations established under § 257.94(b), and identify the groundwater protection standards established under paragraph (d)(2) of this section in the annual groundwater monitoring and corrective action report required by § 257.90(e).

The BASA/BAL remains in detection monitoring, and no assessment monitoring samples were collected or analyzed in 2021. Consequently, Evergy is not required to establish groundwater protection standards for this CCR unit, and this criterion is not applicable.

2.3.5.5 40 CFR § 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 or approval from the Participating State Director or approval from EPA where EPA is the permitting authority. 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.

No assessment monitoring alternate source demonstration or certification was required in 2021. The BASA/BAL remained in detection monitoring during 2021.

2.3.5.6 40 CFR § 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 or approval from the Participating State Director or approval from EPA where EPA is the permitting authority 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.

No assessment of corrective measures was required to be initiated in 2021; therefore, no demonstration or certification is applicable for this unit.

TABLE

TABLE I
SUMMARY OF ANALYTICAL RESULTS - 2021 DETECTION MONITORING
EVERGY KANSAS CENTRAL, INC.
JEFFREY ENERGY CENTER
BOTTOM ASH SETTLING AREA / BOTTOM ASH LANDFILL
ST. MARYS, KANSAS

Location	Upgradient		Downgradient							
	MW-BAA-6		MW-BAA-2		MW-BAA-3		MW-BAA-7			
Measure Point (TOC)	1301.81		1226.56		1222.00		1213.15			
Sample Name	MW-6-030421	BAA-6-091421	MW-2-030421	BAA-2-091421	MW-3-030421	BAA-3-091421	MW-7-030421	BAA-DUP-030421	BAA-7-091421	DUP-BAA-091421
Sample Date	3/4/2021	9/14/2021	3/4/2021	9/14/2021	3/4/2021	9/14/2021	3/4/2021	3/4/2021	9/14/2021	9/14/2021
Final Lab Report Date	3/16/2021	10/29/2021	3/16/2021	10/29/2021	3/16/2021	10/29/2021	3/16/2021	3/16/2021	10/29/2021	10/29/2021
Final Lab Report Revision Date	3/23/2021	N/A	3/23/2021	N/A	3/23/2021	N/A	3/23/2021	3/23/2021	N/A	N/A
Lab Data Reviewed and Validated	4/16/2021	12/10/2021	4/16/2021	12/10/2021	4/16/2021	12/10/2021	4/16/2021	4/16/2021	12/10/2021	12/10/2021
Depth to Water (ft btoc)	79.28	81.67	14.41	17.20	14.52	15.75	18.55	-	20.96	-
Temperature (Deg C)	15.36	17.03	17.35	16.21	14.30	15.64	17.20	-	16.23	-
Conductivity, Field (µS/cm)	3980	4450	2739	1920	3540	3270	5654	-	2060	-
Turbidity, Field (NTU)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0	-
pH, Field (su)	7.03	7.40	7.52	7.90	7.23	7.08	7.70	-	7.31	-
Boron, Total (mg/L)	**4.0**	**3.8**	**0.92**	**1.4**	**2.5**	**2.3**	**0.61**	**0.62**	**0.56**	**0.53**
Calcium, Total (mg/L)	**545**	**557**	**149**	**190**	**495**	**542**	**207**	**209**	**242**	**233**
Chloride (mg/L)	**249**	**310**	**104**	**162**	**157**	**189**	**196**	**198**	**174**	**180**
Fluoride (mg/L)	**0.44**	**0.71**	**0.50**	**0.47**	**0.69**	**0.99**	**0.69**	**0.70**	**0.61**	**0.61**
Sulfate (mg/L)	**1940**	**1870**	**507**	**654**	**2000**	**1850**	**845**	**849**	**756**	**750**
pH (lab) (su)	**6.9**	**7.3**	**7.2**	**7.3**	**6.7**	**7.1**	**7.0**	**7.0**	**7.2**	**7.5**
TDS (mg/L)	**3500**	**3060**	**1170**	**1410**	**3400**	**3330**	**1800**	**1780**	**1670**	**1680**

Notes and Abbreviations:
Bold value: *Detection above laboratory reporting limit.*
Data presented in this table were verified against the laboratory and validation reports.
µS/cm = micro Siemens per centimeter
Deg C = degrees Celsius
ft btoc = feet below top of casing
mg/L = milligrams per liter
N/A = Not Applicable
NTU = Nephelometric Turbidity Unit
su = standard unit
TDS = total dissolved solids
TOC = top of casing

FIGURES

LEGEND

- MONITORING WELL
- PIEZOMETER OBSERVATION ONLY
- BOTTOM ASH SETTLING AREA / BOTTOM ASH LANDFILL

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
4. AERIAL IMAGERY SOURCE: ESRI, SEPTEMBER 3, 2019

N

0 300 600

SCALE IN FEET

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EVERGY KANSAS CENTRAL, INC.
JEFFREY ENERGY CENTER
ST. MARY'S, KANSAS

BOTTOM ASH SETTLING AREA/BOTTOM ASH LANDFILL MONITORING WELL LOCATION MAP

evergy

JANUARY 2022

FIGURE 1

LEGEND

MW-BAA-1
1219.84 WELL NAME AND GROUNDWATER ELEVATION (FEET AMSL), MARCH 2021

MONITORING WELL

PIEZOMETER OBSERVATION ONLY

ESTIMATED GROUNDWATER POTENTIOMETRIC OBSERVATION CONTOUR, 5-FT INTERVAL (AMSL)

GROUNDWATER FLOW DIRECTION

BOTTOM ASH SETTLING AREA / BOTTOM ASH LANDFILL

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.

2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 04 MARCH 2021.

3. AMSL = ABOVE MEAN SEA LEVEL

4. AERIAL IMAGERY SOURCE: ESRI, 3 SEPTEMBER 2019

N

0 300 600
SCALE IN FEET

HALEY ALDRICH

EVERGY KANSAS CENTRAL, INC.
JEFFREY ENERGY CENTER
ST. MARY'S, KANSAS

BOTTOM ASH SETTLING AREA / BOTTOM ASH LANDFILL GROUNDWATER POTENTIOMETRIC ELEVATION CONTOUR MAP MARCH 4, 2021

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JANUARY 2022

FIGURE 2

LEGEND

MW-BAA-1
1219.84 WELL NAME AND GROUNDWATER ELEVATION (SEPTEMBER 2021)

MONITORING WELL

PIEZOMETER OBSERVATION ONLY

ESTIMATED GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION CONTOUR, 5-FT INTERVAL (AMSL)

INFERRED GROUNDWATER POTENTIOMETRIC ELEVATION CONTOUR

GROUNDWATER FLOW DIRECTION

BOTTOM ASH SETTLING AREA / BOTTOM ASH LANDFILL

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.

2. GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 14 SEPTEMBER 2021.

3. AMSL = ABOVE MEAN SEA LEVEL

4. AERIAL IMAGERY SOURCE: ESRI, 3 SEPTEMBER 2019

N

0 300 600
SCALE IN FEET

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BOTTOM ASH SETTLING AREA / BOTTOM ASH LANDFILL GROUNDWATER POTENTIOMETRIC ELEVATION CONTOUR MAP SEPTEMBER 14, 2021

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JANUARY 2022

FIGURE 3