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June 2, 2025
File No. 0210977-003

Evergy Metro, Inc.
818 South Kansas Avenue
Topeka, Kansas 66612

Attention: Jared Morrison – Director, Water and Waste Programs

Subject: Assessment Monitoring Program May 2024 Sampling Event
Notification of Statistically Significant Level (40 CFR § 257.95(g)) - Addendum
La Cygne Generating Station
CCR Landfill, Lower AQC Impoundment, and Upper AQC Impoundment
Multi-Unit Groundwater Monitoring System

Dear Mr. Morrison:

On behalf of Evergy Metro, Inc. (Evergy), in accordance with Title 40 Code of Federal Regulations (40 CFR) § 257.95(g) of the U.S. Environmental Protection Agency (USEPA) Federal Coal Combustion Residuals (CCR) Rule (40 CFR §§ 257 and 261) effective October 19, 2015, including subsequent revisions, Haley & Aldrich, Inc. (Haley & Aldrich) has prepared this **addendum** to the notification of statistically significant levels¹ (SSL) for Appendix IV constituents above groundwater protection standards (GWPS) established under 40 CFR § 257.95(h) at the multi-unit groundwater monitoring program for the referenced CCR monitoring units at La Cygne Generating Station. Evergy provided Haley & Aldrich with groundwater monitoring data collected from the multi-unit groundwater monitoring system that meets requirements of 40 CFR § 257.91 and § 257.93.

Haley & Aldrich completed statistical analyses in accordance with the certified statistical methods for the multi-unit groundwater monitoring system, and “in general accordance with *Unified Guidance for Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities* dated March 2009 (USEPA, 2009) and generally accepted procedures.”² The Unified Guidance provides direction on using confidence intervals for SSL determination in assessment monitoring to confirm SSLs and recommends constructing a 95 percent confidence interval for the mean concentration at each compliance well, specifically the 95 percent lower confidence limit (LCL). In accordance with the Unified Guidance, “if the lower

¹ SCS Engineers, 2024. *Assessment Monitoring Program May 2024 Sampling Event, Notification of Statistically Significant Level (40 CFR § 257.95(g)), La Cygne Generating Station, CCR Landfill, Lower AQC Impoundment, and Upper AQC Impoundment, Multi-Unit Groundwater Monitoring System*. November.

² SCS Engineers, 2023. *Certification of Statistical Methods – 40 CFR 257.93(f)(6), CCR Landfill, Lower AQC Impoundment, and Upper AQC Impoundment*. October.

confidence limit (LCL) exceeds the GWPS in compliance/assessment, a clear exceedance can be identified.”

When the LCL is applied, the results of the statistical analyses completed by Haley & Aldrich of the May 2024 assessment monitoring sampling event data for each analyte/well combination indicate a SSL above GWPS for the following:

Constituent	Well ID
Lithium	MW-707B

If you have any questions or comments, please contact us.

Sincerely yours,
HALEY & ALDRICH, INC.



Steve Putrich, P.E.
Project Principal



Mark Nicholls, P.G.
Principal Hydrogeologist

