# 2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT <br> 322 LANDFILL <br> TECUMSEH ENERGY CENTER <br> TECUMSEH, KANSAS 

by
Haley \& Aldrich, Inc.
Cleveland, Ohio
for
Evergy Kansas Central, Inc.
Topeka, Kansas

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This Annual Groundwater Monitoring and Corrective Action Report documents the groundwater monitoring program for the Tecumseh Energy Center (TEC) 322 Landfill 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 TEC 322 Landfill is, to the best of my knowledge, accurate and complete.

Signed:


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 322 Landfill at the Tecumseh Energy Center (TEC), 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 TEC 322 Landfill consistent with applicable sections of 257.90 through 257.98 , and describes activities conducted in the prior calendar year (2020) and documents compliance with the Rule. The specific requirements for the annual report listed in $\S 257.90$ (e) of the Rule are provided in Sections 1 and 2 of this Annual Report and are in bold italic font, followed by a short 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 322 Landfill was operating under an assessment monitoring program in compliance with 40 CFR § 257.95 .
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 322 Landfill was operating under an assessment monitoring program in compliance with 40 CFR § 257.95.
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

The 322 Landfill is operating under an assessment monitoring program; therefore, no statistical evaluations were completed on appendix III constituents in 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.

An assessment monitoring program was initiated on July 17, 2018 for the 322 Landfill with a notification establishing assessment monitoring provided on August 15, 2018 to meet the requirements of 40 CFR § 257.95 . The 322 Landfill remained in assessment monitoring 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;

No statistically significant levels were identified above the groundwater protection standard for those constituents listed in appendix IV to this part in 2021 for the 322 Landfill.
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 322 Landfill remained in assessment 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 322 Landfill 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 322 Landfill remained in assessment 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 322 Landfill remains in assessment monitoring, and no remedy was required to be selected.

### 1.1.6 40 CFR § 257.90(e)(6)(vi) - Remedial Activities <br> 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 $\S \S 257.90$ 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 TEC 322 Landfill. The 322 Landfill is subject to the groundwater monitoring and corrective action requirements described under 40 CFR $\S \S 257.90$ 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 322 Landfill as required by the Rule. Groundwater sampling and analysis was conducted in accordance with requirements described in $\S 257.93$, and the status of the groundwater monitoring program described in § 257.94 and $\S 257.95$ is also 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 322 Landfill remained in the assessment 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 semi-annual assessment monitoring sampling event.

## 2021 Annual Groundwater Monitoring and Corrective Action Report

A semi-annual assessment monitoring sampling event was completed in March 2021 for detected appendix IV constituents identified from the June 2020 annual assessment monitoring sampling event. Statistical evaluation was completed in July 2021 on analytical data from the March 2021 semi-annual assessment monitoring sampling event.

An annual assessment monitoring sampling event was completed in June 2021 to identify detected appendix IV constituents for subsequent semi-annual sampling events in September 2021 and planned for March 2022. Semi-annual assessment monitoring sampling was completed in September 2021 for detected appendix IV constituents identified during the June 2021 annual monitoring event. Statistical evaluation of the results from the September 2021 semi-annual assessment 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 2020 consisted of laboratory analytical errors that required the laboratory to reanalyze select analytical results. Mercury was reanalyzed for all monitoring wells in the June 2021 annual assessment monitoring sampling event due to suspected erroneous analytical results. This was the only issue that needed to be addressed at the 322 Landfill 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 322 Landfill 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 the completion of the 2021 Annual Groundwater Monitoring and Corrective Action Report, statistical evaluation of semi-annual assessment monitoring analytical data collected in September 2021, semi-annual assessment monitoring and subsequent statistical evaluations, and annual assessment monitoring.
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 322 Landfill 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 during 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 § 257.95(b) and § 257.95(d)(1), three independent assessment monitoring samples from each background and downgradient monitoring well were collected in 2021. A summary including sample names, dates of sample collection, field parameters, and monitoring data obtained for the groundwater monitoring program for the 322 Landfill 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 through 4.

### 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

The assessment monitoring program was initiated on July 17, 2018 with a notification establishing assessment monitoring provided on August 15, 2018 to meet the requirements of 40 CFR § 257.95. The 322 Landfill remained in assessment monitoring during 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 $\S \S 257.90$ through 257.95 of the Rule. It is understood that there are supplemental references in $\S \S 257.90$ through 257.98 that must be placed in the Annual Report. The following requirements include relevant and required information in the Annual Report for 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.

This unit is in assessment monitoring; therefore, no detection monitoring alternate source 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).

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).

An assessment monitoring program has been implemented at the CCR unit since July 17, 2018. Three rounds of assessment monitoring sampling were completed in 2021. Analytical results for both downgradient and upgradient wells are provided in Table I. The background concentrations (upper tolerance limits) and groundwater protection standards established for detected appendix IV constituents for the 322 Landfill are included in Table II. The background concentrations and groundwater protection standards provided in Table II were utilized for the statistical evaluations completed in 2021 for September 2020 and March 2021 semi-annual assessment monitoring sampling events.

### 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 322 Landfill remained in assessment 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 $\S \mathbf{2 5 7 . 9 0}($ 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 of corrective measures was required to be initiated in 2021; therefore, no demonstration or certification is applicable for this unit.

TABLES

## table I

## SUMMARY OF ANALYTICAL RESULTS - 2021 ASSESSMENT MONITORING

EVERGY KANSAS CENTRAL, INC.
TECUMSEH ENERGY CENTER
322 ASH LANDFILL
tecumseh, kansas

| Location | Upgradient |  |  | Downgradient |  |  |  |  |  | Downgradient |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | MW-4 |  |  | MW-1 |  |  |  |  | MW-5 |  |  |  | MW-6 |  |  |
| Measure Point (TOC) |  | 936.48 |  |  |  | 904.65 |  |  |  |  |  |  |  |  |  |
| Sample Name | MW-4.030821 | MW-4-060721 | MW-4.091321 | MW-1-030821 | DUP-322L-030821 | MW-1-060721 | DUP-322LF-060721 | MW-1-091321 | MW-5-030821 | MW-5-060721 | MW-5-091321 | TEC-322L--UUP-091321 | MW-6-030821 | MW-6-060721 | MW-6-091321 |
| Sample Date | 3/8/2021 | 06/07/2021 | 9/13/2021 | 3/8/2021 | 3/8/2021 | 06/07/2021 | 06/07/2021 | 9/13/2021 | 3/8/2021 | 06/07/2021 | 9/13/2021 | 9/13/2021 | 3/8/2021 | 06/07/2021 | 9/13/2021 |
| Final Lab Report Date | 3/17/2021 | 6/16/2021 | 10/29/2021 | 3/17/2021 | 3/17/2021 | 6/16/2021 | 6/16/2021 | 10/29/2021 | 3/17/2021 | 6/16/2021 | 10/29/2021 | 10/29/2021 | 3/17/2021 | 6/16/2021 | 10/29/2021 |
| Final Lab Report Revision Date | N/A | 7/15/2021 | NA | N/A | N/A | 7/15/2021 | 7/15/2021 | NA | N/A | 7/15/2021 | NA | NA | N/A | 7/15/2021 | NA |
| Final Radiation Lab Report Date | N/A | 7/6/2021 | NA | N/A | N/A | 7/6/2021 | 7/6/2021 | NA | N/A | 7/6/2021 | NA | NA | N/A | 7/6/2021 | NA |
| Final Radiation Lab Report Revision Date | N/A |  | NA | N/A | N/A | NA |  | NA | N/A | NA | NA | NA | N/A |  | NA |
| Lab Data Reviewed and Validated | 4/16/2021 | 8/2/2021 | 11/14/2021 | 4/16/2021 | 4/16/2021 | 8/2/2021 | 8/2/2021 | 11/14/2021 | 4/16/2021 | 8/2/2021 | 11/14/2021 | 11/14/2021 | 4/16/2021 | 8/2/2021 | 11/14/2021 |
| Depth to Water (ft btoc) | 4.43 | 4.18 | 5.03 | 4.45 |  | 4.22 |  | 4.78 | 6.47 | 6.38 | 7.04 |  | 8.75 | 8.42 | 8.81 |
| Temperature ( ${ }^{\text {deg }} \mathrm{C}$ ) | 12.53 | 16.81 | 22.03 | 10.39 | - | 13.85 | - | 20.86 | 13.96 | 19.99 | 20.76 |  | 12.85 | 15.91 | 19.79 |
| Conductivity, Field ( $\mu \mathrm{H} / \mathrm{cm}$ ) | 1590 | 1622 | 1580 | 1400 | - | 1260 | - | 1220 | 2110 | 1930 | 1710 | . | 2080 | 1990 | 196 |
| Turbidity, Field (NTU) | 0.0 | 0.0 | 0.0 | 3.3 | - | 0.0 | - | 0.0 | 0.0 | 0.0 | 2.1 |  | 0.0 | 0.0 | 14 |
| pH, Field (su) | 7.14 | 6.90 | 7.33 | 7.21 |  | 6.83 | - | 7.36 | 6.96 | 6.75 | 7.33 |  | 7.22 | 6.45 | 7.36 |
| Boron, Total ( $\mathrm{mg} / \mathrm{L}$ ) | <0.10 |  | <0.10 | 0.46 | 0.49 |  |  | $<0.10$ | 1.0 |  | 0.64 | 0.61 | 0.67 |  | 0.62 |
| Calcium, Total ( $\mathrm{mg} / \mathrm{L}$ ) | 188 | - | 156 | 177 | 187 | - | - | 154 | 360 | - | 240 | 232 | 313 | . | 292 |
| Chloride ( $\mathrm{m} / \mathrm{L}$ ) | 244 |  | 232 | 24.8 | 24.7 |  |  | 50.7 | 28.8 |  | 44.1 | 44.9 | 55.2 |  | 55.9 |
| Fluoride ( $\mathrm{mg} / \mathrm{L}$ ) | $<0.20$ | $<0.20$ | 0.25 | $<0.20$ | 0.33 | $<0.20$ | <0.20 | $<0.20$ | $<0.20$ | <0.20 | 0.39 | 0.39 | <0.20 | $<0.20$ | 0.56 |
| Sulfate (mg/L) | 171 | - | 157 | 404 | 408 | - | - | 353 | 1050 | - | 784 | 676 | 874 | - | 932 |
| $\mathrm{pH}(\mathrm{lab})(\mathrm{su})$ | 6.8 |  | 7.2 | 6.8 | 7.0 |  |  | 7.0 | 6.8 |  | 7.4 | 6.8 | 6.9 |  | 7.0 |
| TDS (mg/L) | 1110 | - | 1060 | 1030 | 1010 | - | - | 889 | 1890 | - | 1490 | 1410 | 1650 | - | 1590 |
| Antimony, Total ( $\mathrm{m} / \mathrm{L}$ ) |  | <0.0010 |  |  |  | <0.0010 | <0.0010 |  |  | <0.0010 |  |  |  | <0.0010 |  |
| Arsenic, Total (mg/L) |  | <0.0010 | $<0.0010$ |  |  | 0.0013 | 0.0013 | $<0.0020$ |  | <0.0010 | $<0.0010$ | $<0.0010$ |  | <0.0010 | <0.0010 |
| Barium, Total ( $\mathrm{m} / \mathrm{LL}$ ) | 0.095 | 0.098 | 0.10 | 0.091 | 0.095 | 0.087 | 0.083 | 0.062 | 0.017 | 0.019 | 0.026 | 0.024 | 0.018 | 0.018 | 0.017 |
| Beryllium, Total ( $\mathrm{m} / \mathrm{L}$ ) | - | <0.0010 | - | - | - | <0.0010 | <0.0010 | - | - | <0.0010 | - | - | - | <0.0010 | - |
| Cadmium, Total ( $\mathrm{mg} / \mathrm{L}$ ) |  | <0.00050 |  |  |  | <0.00050 | <0.00050 |  |  | <0.00050 |  |  |  | <0.00050 |  |
| Chromium, Total ( $\mathrm{mg} / \mathrm{L}$ ) |  | <0.0050 |  |  |  | <0.0050 | <0.0050 |  |  | <0.0050 |  |  |  | <0.0050 |  |
| Cobalt, Total ( $\mathrm{mg} / \mathrm{L}$ ) | <0.0010 | <0.0010 | $<0.0010$ | $<0.0010$ | <0.0010 | 0.0014 | 0.0014 | 0.0032 | 0.0015 | 0.0018 | 0.0019 | 0.0019 | 0.0023 | 0.0022 | 0.0029 |
| Lead, Total ( $\mathrm{m} / \mathrm{L}$ ) |  | <0.010 |  |  |  | $<0.010$ | $<0.010$ |  |  | $<0.010$ |  |  |  | $<0.010$ |  |
| Lithium, Total ( $\mathrm{mg} / \mathrm{L}$ ) | $<0.010$ | <0.010 | . | $<0.010$ | <0.010 | <0.010 | <0.010 | - | 0.010 | $<0.010$ | . |  | 0.011 | $<0.010$ | . |
| Molybdenum, Total (mg/L) | $<0.0010$ | $<0.0010$ | - | $<0.0010$ | $<0.0010$ | $<0.0010$ | $<0.0010$ | - | $<0.0010$ | $<0.0010$ | - | - | $<0.0010$ | $<0.0010$ | - |
| Selenium, Total (mg/L) |  | <0.0010 |  |  |  | <0.0010 | <0.0010 | - |  | <0.0010 | - | - |  | < 0.0010 |  |
| Thallium, Total ( $\mathrm{mg} / \mathrm{L}$ ) | - | <0.0010 |  |  | - | $<0.0010$ | $<0.0010$ |  |  | $<0.0010$ |  |  | . | <0.0010 |  |
|  | - | ${ }_{1.55 \pm 0.00020}$ | $\frac{<0.00020}{1.70 \pm 1.05(1.85)}$ |  | - | $\frac{<0.00020}{0.434 \pm 0.463(0.758)}$ | $\frac{<0.00020}{0.631 \pm 0.525(0.818)}$ | ${ }_{0.624 \pm 00020}^{0.732(1.52)}$ | - | $\frac{<0.00020}{0.252 \pm 0.483(0.738)}$ | $\frac{<0.00020}{1.32 \pm 0.887(1.5)}$ | $\frac{<0.00020}{1.15 \pm 1.00(1.94)}$ | - | $\frac{<0.00020}{0.907 \pm 0.555(0.802)}$ | $\frac{<0.00020}{0.206 \pm 0.731(1.75)}$ |
| Radium-226 \& 228 ( $\mathrm{PC} / \mathrm{L}$ L) | - | $1.55 \pm \pm 0.744(0.896)$ | $1.70 \pm 1.05(1.85)$ |  | - | $0.434 \pm 0.4633(0.758)$ | $0.631 \pm 0.525(0.818)$ | $0.624 \pm 0.732$ (1.52) |  | $0.252 \pm 0.483(0.738)$ | $1.32 \pm 0.887(1.55)$ | $1.15 \pm 1.00(1.94)$ | - | $0.907 \pm 0.55550 .802)$ | $0.206 \pm 0.731(1.75)$ |

$\frac{\text { Radium- } 226 \& 228 \text { (pci/L) }}{\text { Notes and Abbreviations: }}$

| $1.55 \pm 0.744(0.896)$ | $1.70 \pm 1.050$ |
| :--- | :--- |

Bold value: Detection above laboratory reporting limit or minimum detectable concentration (MDC).
Radiological results sre presented as activity y lus or minus uncertainty with MDC.
Data presented in this table erere verfifed ogainst the laboratorr and volidation reeo
Data presented in this table were vertit
$\mu \mathrm{S} / \mathrm{m}=\mathrm{m}=$ micro Siemens per centimeter
Deg $C=$ degrees Celsius
$f t$ btoc $=$ feet below top of casing
$m a / L=$ milligrams per
$\mathrm{mg} / L=$ milligrams per $i$ ier
$\mathrm{N} / \mathrm{A}=$ Not Applicable
NTU = Nephelometric Turbidity Unit
$p C i / l=$ picicouries per lier
$s u=$ standard unit
su $=$ standard unit
TDS $=$ total dissolved
TOS $=$ total dissolved $s$
TOC $=$ top of ocsing

TABLE II
ASSESSMENT GROUNDWATER MONITORING - DETECTED APPENDIX IV GWPS
SEPTEMBER 2020 AND MARCH 2021 SAMPLING EVENTS
TECUMSEH ENERGY CENTER
322 LANDFILL
TECUMSEH, KANSAS

| Well \# | Background Value ${ }^{1}$ | GWPS |
| :---: | :---: | :---: |
| CCR Appendix-IV Barium, Total (mg/L) |  |  |
| MW-4 (upgradient) | 0.137 | NA |
| MW-1 |  | 2 |
| MW-5 |  | 2 |
| MW-6 |  | 2 |
| CCR Appendix-IV Cobalt, Total (mg/L) |  |  |
| MW-4 (upgradient) | 0.001 | NA |
| MW-1 |  | 0.006 |
| MW-5 |  | 0.006 |
| MW-6 |  | 0.006 |
| CCR Appendix-IV Fluoride, Total (mg/L) |  |  |
| MW-4 (upgradient) | 0.350 | NA |
| MW-1 |  | 4.0 |
| MW-5 |  | 4.0 |
| MW-6 |  | 4.0 |
| CCR Appendix-IV Lithium, Total (mg/L) |  |  |
| MW-4 (upgradient) | 0.010 | NA |
| MW-1 |  | 0.040 |
| MW-5 |  | 0.040 |
| MW-6 |  | 0.040 |
| CCR Appendix-IV: Molybdenum, Total (mg/L) |  |  |
| MW-4 (upgradient) | $0.001{ }^{2}$ | NA |
| MW-1 |  | 0.100 |
| MW-5 |  | 0.100 |
| MW-6 |  | 0.100 |

## Notes and Abbreviations:

${ }^{1}$ Based on background data collected from 08/17/2016 through 03/08/2020, unless otherwise noted.
${ }^{2}$ Based on background data collected from 08/17/2016 through 09/16/2020.
CCR $=$ Coal Combustion Residuals
GWPS = Groundwater Protection Standard
$\mathrm{mg} / \mathrm{L}=$ milligrams per Liter
NA $=$ Not Applicable
pCi/L = picoCuries per Liter

FIGURES





March 1, 2022
Project No. 0204993-000


TO: Evergy Kansas Central, Inc. Jared Morrison - Director, Water and Waste Programs

FROM: Haley \& Aldrich, Inc. Steven F. Putrich, P.E., Principal Consultant - Engineering Principal Mark Nicholls, P.G., Senior Associate - Senior Hydrogeologist

SUBJECT: 2021 Annual Groundwater Monitoring and Corrective Action Report Addendum Evergy Kansas Central, Inc. (Evergy) 322 Landfill Tecumseh Energy Center - Tecumseh, Kansas

The 322 Landfill at the Evergy's Tecumseh Energy Center (TEC) is subject to the groundwater monitoring and corrective action requirements described under Title 40 Code of Federal Regulations (40 CFR) § 257.90 through § 257.98 (Rule). An Annual Groundwater Monitoring and Corrective Action (GWMCA) Report documenting the activities completed in 2021 for the 322 Landfill was completed and placed in the facilities operating record on January 31, 2022, as required by the Rule. The Annual Groundwater Monitoring and Corrective Action Report (annual groundwater report) contained the specific information listed in § 257.90 (e).

This report addendum has been prepared to supplement the operating record in recognition of comments received by Evergy from the U.S. Environmental Protection Agency (USEPA) on January 11, 2022. In addition to the information listed in § 257.90(e), the USEPA indicated in their comments that the GWMCA Report should contain:

- Results of laboratory analysis of groundwater or other environmental media samples for the presence of constituents of Appendices III and IV to 40 C.F.R. part 257 (or of other constituents, such as those supporting characterization of site conditions that may ultimately affect a remedy);
- Required statistical analyses performed on those [laboratory analysis] results;
- Measured groundwater elevations; and,
- Calculated groundwater flow rate and direction.

While this information is not specifically referred to in the in 257.90(e) of the Rule for inclusion in the GWMCA Reports, it has been routinely collected and maintained in Evergy's files, and is being provided in the attachments to this addendum. The 2021 GWMCA Report does include a "Groundwater Potentiometric Elevation Contour Map" for each of the 2021 sampling events as Figures 2, 3, and 4. In those figures, the measured groundwater elevations for each well are listed along with the calculated
groundwater flow rate and direction. Those maps have not been duplicated in this addendum and can be referenced in the original GWMCA Report dated January 31, 2022.

The attachments to this addendum are as follows providing the additional information:

## Attachment 1 - Laboratory Analytical Reports

- Includes laboratory data packages with supporting information, such as, case narrative, sample and method summary, analytical results, quality control, and chain-of-custody documentation. The laboratory data packages for the sampling events completed in March 2021, June 2021, and September 2021 are provided.


## Attachment 2 - Statistical Analyses

- Includes a discussion of the statistical analyses utilized along with a table summarizing the statistical outputs (e.g., frequency of detection, maximum detection, variance, standard deviation, coefficient of variance, outlier tests, trends, upper and lower confidence limits, and comparison against Groundwater Protection Standards), and supporting backup for statistical analyses completed in 2021. Statistical analyses completed in 2021 included:
- January 2021 statistical analyses for data obtained in the September 2020 sampling event; and,
- July 2021 statistical analyses for data obtained in the March 2021 sampling event.


## ATTACHMENT 1

Laboratory Analytical Reports

## ATTACHMENT 1-1

March 2021 Sampling Event Laboratory Analytical Report

March 17, 2021

Andrew Hare<br>Evergy, Inc.<br>818 Kansas Avenue<br>Topeka, KS 66612

```
RE: Project: TEC 322 LANDFILL CCR
    Pace Project No.: }6036307
```

Dear Andrew Hare:
Enclosed are the analytical results for sample(s) received by the laboratory on March 08, 2021. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Kansas City

If you have any questions concerning this report, please feel free to contact me.

Sincerely,


Jasmine Amerin
jasmine.amerin@pacelabs.com
(913)599-5665

Project Manager

Enclosures
cc: Laura Hines, Evergy, Inc.
Heath Horyna, Evergy, Inc.
Jake Humphrey, Evergy, Inc.
Samantha Kaney, Haley \& Aldrich
Melissa Michels, Evergy, Inc.
Jared Morrison, Evergy, Inc.
Danielle Oberbroeckling, Haley \& Aldrich
Melanie Satanek, Haley \& Aldrich, Inc.

REPORT OF LABORATORY ANALYSIS

## CERTIFICATIONS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |

Pace Analytical Services Kansas
9608 Loiret Boulevard, Lenexa, KS 66219
Missouri Inorganic Drinking Water Certification \#: 10090
Arkansas Drinking Water
Arkansas Certification \#: 20-020-0
Arkansas Drinking Water
Illinois Certification \#: 200030
Iowa Certification \#: 118
Kansas/NELAP Certification \#: E-10116
Louisiana Certification \#: 03055

Nevada Certification \#: KS000212020-2
Oklahoma Certification \#: 9205/9935
Florida: Cert E871149 SEKS WET
Texas Certification \#: T104704407-19-12
Utah Certification \#: KS000212019-9
Illinois Certification \#: 004592
Kansas Field Laboratory Accreditation: \# E-92587
Missouri SEKS Micro Certification: 10070

## SAMPLE SUMMARY

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |


| Lab ID | Sample ID | Matrix | Date Collected | Date Received |
| :---: | :---: | :---: | :---: | :---: |
| 60363071001 | MW-1-030821 | Water | 03/08/21 10:55 | 03/08/21 16:45 |
| 60363071002 | MW-4-030821 | Water | 03/08/21 13:50 | 03/08/21 16:45 |
| 60363071003 | MW-5-030821 | Water | 03/08/21 12:50 | 03/08/21 16:45 |
| 60363071004 | MW-6-030821 | Water | 03/08/21 11:50 | 03/08/21 16:45 |
| 60363071005 | DUP-322LF-030821 | Water | 03/08/21 10:55 | 03/08/21 16:45 |

## SAMPLE ANALYTE COUNT

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |


| Lab ID | Sample ID | Method | Analysts | Analytes Reported | Laboratory |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 60363071001 | MW-1-030821 | EPA 200.7 | TDS | 3 | PASI-K |
|  |  | EPA 6010 | TDS | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | LDB | 1 | PASI-K |
|  |  | EPA 300.0 | AJS | 3 | PASI-K |
| 60363071002 | MW-4-030821 | EPA 200.7 | TDS | 3 | PASI-K |
|  |  | EPA 6010 | TDS | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | LDB | 1 | PASI-K |
|  |  | EPA 300.0 | AJS | 3 | PASI-K |
| 60363071003 | MW-5-030821 | EPA 200.7 | TDS | 3 | PASI-K |
|  |  | EPA 6010 | TDS | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | LDB | 1 | PASI-K |
|  |  | EPA 300.0 | AJS | 3 | PASI-K |
| 60363071004 | MW-6-030821 | EPA 200.7 | TDS | 3 | PASI-K |
|  |  | EPA 6010 | TDS | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | LDB | 1 | PASI-K |
|  |  | EPA 300.0 | AJS | 3 | PASI-K |
| 60363071005 | DUP-322LF-030821 | EPA 200.7 | TDS | 3 | PASI-K |
|  |  | EPA 6010 | TDS | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | LDB | 1 | PASI-K |
|  |  | EPA 300.0 | AJS | 3 | PASI-K |

PASI-K = Pace Analytical Services - Kansas City

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60363071
Method: EPA 200.7
Description: 200.7 Metals, Total
Client: Evergy Kansas Central, Inc.
Date: March 17, 2021

## General Information:

5 samples were analyzed for EPA 200.7 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Sample Preparation:

The samples were prepared in accordance with EPA 200.7 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

## Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.
QC Batch: 707888
A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60362592001,60362965003
M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2850769)
- Calcium


## Additional Comments:

## PROJECT NARRATIVE

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |

Method: EPA 6010
Description: 6010 MET ICP
Client: Evergy Kansas Central, Inc.
Date: March 17, 2021

## General Information:

5 samples were analyzed for EPA 6010 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Sample Preparation:

The samples were prepared in accordance with EPA 3010 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |

Method: EPA 200.8
Description: 200.8 MET ICPMS
Client: Evergy Kansas Central, Inc.
Date: March 17, 2021

## General Information:

5 samples were analyzed for EPA 200.8 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Sample Preparation:

The samples were prepared in accordance with EPA 200.8 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60363071
Method: SM 2540C
Description: 2540C Total Dissolved Solids
Client: Evergy Kansas Central, Inc.
Date: March 17, 2021

## General Information:

5 samples were analyzed for SM 2540C by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:
All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

## PROJECT NARRATIVE

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |


| Method: | SM 4500-H+B |
| :--- | :--- |
| Description: | $4500 \mathrm{H}+\mathrm{pH}$, Electrometric |
| Client: | Evergy Kansas Central, Inc. |
| Date: | March 17, 2021 |

## General Information:

5 samples were analyzed for SM $4500-\mathrm{H}+\mathrm{B}$ by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.
H6: Analysis initiated outside of the 15 minute EPA required holding time.

- DUP-322LF-030821 (Lab ID: 60363071005)
- MW-1-030821 (Lab ID: 60363071001)
- MW-4-030821 (Lab ID: 60363071002)
- MW-5-030821 (Lab ID: 60363071003)
- MW-6-030821 (Lab ID: 60363071004)


## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

## Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |

Method: EPA 300.0
Description: 300.0 IC Anions 28 Days
Client: Evergy Kansas Central, Inc.
Date: March 17, 2021

## General Information:

5 samples were analyzed for EPA 300.0 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.
QC Batch: 707847
A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60360745002,60362783002
M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2850670)
- Fluoride
- MSD (Lab ID: 2850671)
- Chloride
- Fluoride


## Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |


| Sample: MW-1-030821 <br> Parameters | Lab ID: 603 <br> Results | $3071001$ <br> Units | Collected: 03/08/ <br> Report Limit | $10:$ DF | Received: 03 <br> Prepared | /08/21 16:45 <br> Analyzed | atrix: Water CAS No. | Qual |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.091 | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 03/10/21 16:37 | 03/16/21 14:56 | 7440-39-3 |  |
| Boron, Total Recoverable | 0.46 | $\mathrm{mg} / \mathrm{L}$ | 0.10 | 1 | 03/10/21 16:37 | 03/16/21 14:56 | 7440-42-8 |  |
| Calcium, Total Recoverable | 177 | $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 | 03/10/21 16:37 | 03/16/21 14:56 | 7440-70-2 |  |
| 6010 MET ICP | Analytical Method: EPA 6010 Preparation Method: EPA 3010 Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Lithium, Total Recoverable | <0.010 | mg/L | 0.010 | 1 | 03/12/21 09:44 | 03/15/21 18:03 | 7439-93-2 |  |
| 200.8 MET ICPMS | Analytical Method: EPA 200.8 Preparation Method: EPA 200.8 Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Cobalt, Total Recoverable | <0.0010 | mg/L | 0.0010 | 1 | 03/11/21 16:30 | 03/17/21 12:07 | 7440-48-4 |  |
| Molybdenum, Total Recoverable | <0.0010 | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | 03/11/21 16:30 | 03/17/21 12:07 | 7439-98-7 |  |
| 2540C Total Dissolved Solids | Analytical Method: SM 2540C <br> Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Total Dissolved Solids | 1030 | $\mathrm{mg} / \mathrm{L}$ | 10.0 | 1 |  | 03/12/21 15:23 |  |  |
| $4500 \mathrm{H}+\mathrm{pH}$, Electrometric | Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| pH at 25 Degrees C | 6.8 | Std. Units | 0.10 | 1 |  | 03/15/21 07:55 |  | H6 |
| 300.0 IC Anions 28 Days | Analytical Method: EPA 300.0 |  |  |  |  |  |  |  |
| Chloride | 24.8 | mg/L | 5.0 | 5 |  | 03/11/21 18:07 | 16887-00-6 |  |
| Fluoride | <0.20 | $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 |  | 03/12/21 18:00 | 16984-48-8 |  |
| Sulfate | 404 | $\mathrm{mg} / \mathrm{L}$ | 50.0 | 50 |  | 03/11/21 18:22 | 14808-79-8 |  |

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |


| Sample: MW-4-030821 <br> Parameters | Lab ID: 603 <br> Results | $3071002$ <br> Units | Collected: 03/08/ <br> Report Limit | $13:$ DF | Received: 03 <br> Prepared | 08/21 16:45 M <br> Analyzed | trix: Water CAS No. | Qual |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.095 | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 03/10/21 16:37 | 03/16/21 14:58 | 7440-39-3 |  |
| Boron, Total Recoverable | <0.10 | $\mathrm{mg} / \mathrm{L}$ | 0.10 | 1 | 03/10/21 16:37 | 03/16/21 14:58 | 7440-42-8 |  |
| Calcium, Total Recoverable | 188 | $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 | 03/10/21 16:37 | 03/16/21 14:58 | 7440-70-2 |  |
| 6010 MET ICP | Analytical Method: EPA 6010 Preparation Method: EPA 3010 Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Lithium, Total Recoverable | <0.010 | mg/L | 0.010 | 1 | 03/12/21 09:44 | 03/15/21 18:06 | 7439-93-2 |  |
| 200.8 MET ICPMS | Analytical Method: EPA 200.8 Preparation Method: EPA 200.8 Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Cobalt, Total Recoverable | <0.0010 | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | 03/11/21 16:30 | 03/17/21 12:17 | 7440-48-4 |  |
| Molybdenum, Total Recoverable | <0.0010 | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | 03/11/21 16:30 | 03/17/21 12:17 | 7439-98-7 |  |
| 2540C Total Dissolved Solids | Analytical Method: SM 2540C <br> Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Total Dissolved Solids | 1110 | $\mathrm{mg} / \mathrm{L}$ | 13.3 | 1 |  | 03/12/21 15:23 |  |  |
| $4500 \mathrm{H}+\mathrm{pH}$, Electrometric | Analytical M Pace Analytic | od: SM 45 <br> Services | $0-\mathrm{H}+\mathrm{B}$ <br> Kansas City |  |  |  |  |  |
| pH at 25 Degrees C | 6.8 | Std. Units | 0.10 | 1 |  | 03/15/21 07:57 |  | H6 |
| 300.0 IC Anions 28 Days | Analytical Method: EPA 300.0 |  |  |  |  |  |  |  |
| Chloride | 244 | mg/L | 20.0 | 20 |  | 03/10/21 18:39 | 16887-00-6 |  |
| Fluoride | <0.20 | $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 |  | 03/11/21 19:05 | 16984-48-8 |  |
| Sulfate | 171 | $\mathrm{mg} / \mathrm{L}$ | 20.0 | 20 |  | 03/10/21 18:39 | 14808-79-8 |  |

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |


| Sample: MW-5-030821 <br> Parameters | Lab ID: 603 <br> Results | $3071003$ <br> Units | Collected: 03/08/ <br> Report Limit | $12: 50$ <br> DF | Received: 03 <br> Prepared | /08/21 16:45 <br> Analyzed | Matrix: Water CAS No. | Qual |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.017 | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 03/10/21 16:37 | 03/16/21 15:01 | 7440-39-3 |  |
| Boron, Total Recoverable | 1.0 | $\mathrm{mg} / \mathrm{L}$ | 0.10 | 1 | 03/10/21 16:37 | 03/16/21 15:01 | 7440-42-8 |  |
| Calcium, Total Recoverable | 360 | $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 | 03/10/21 16:37 | 03/16/21 15:01 | 7440-70-2 |  |
| 6010 MET ICP | Analytical Method: EPA 6010 Preparation Method: EPA 3010 Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Lithium, Total Recoverable | 0.010 | $\mathrm{mg} / \mathrm{L}$ | 0.010 | 1 | 03/12/21 09:44 | 03/15/21 18:22 | 7439-93-2 |  |
| 200.8 MET ICPMS | Analytical Method: EPA 200.8 Preparation Method: EPA 200.8 Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Cobalt, Total Recoverable | 0.0015 | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | 03/11/21 16:30 | 03/17/21 12:20 | 7440-48-4 |  |
| Molybdenum, Total Recoverable | <0.0010 | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | 03/11/21 16:30 | 03/17/21 12:20 | 7439-98-7 |  |
| 2540C Total Dissolved Solids | Analytical Method: SM 2540C <br> Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Total Dissolved Solids | 1890 | $\mathrm{mg} / \mathrm{L}$ | $20.0$ | 1 |  | 03/12/21 15:23 |  |  |
| $4500 \mathrm{H}+\mathrm{pH}$, Electrometric | Analytical M Pace Analytic | od: SM 45 <br> Services | $0-\mathrm{H}+\mathrm{B}$ <br> Kansas City |  |  |  |  |  |
| pH at 25 Degrees C | 6.8 | Std. Units | 0.10 | 1 |  | 03/15/21 07:58 |  | H6 |
| 300.0 IC Anions 28 Days | Analytical Method: EPA 300.0 |  |  |  |  |  |  |  |
| Chloride | 28.8 | mg/L | 5.0 | 5 |  | 03/11/21 19:33 | 16887-00-6 |  |
| Fluoride | <0.20 | $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 |  | 03/11/21 19:19 | 16984-48-8 |  |
| Sulfate | 1050 | $\mathrm{mg} / \mathrm{L}$ | 100 | 100 |  | 03/11/21 19:48 | 14808-79-8 |  |

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |



## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |



Analytical Method: EPA 6010 Preparation Method: EPA 3010
Pace Analytical Services - Kansas City
$\begin{array}{lllllllllll}<0.010 & \mathrm{mg} / \mathrm{L} & 0.010 & 1 & 03 / 12 / 21 & 09: 44 & 03 / 15 / 21 & 18: 28 & 7439-93-2\end{array}$
Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $03 / 11 / 21$ | $16: 30$ | $03 / 17 / 21$ | $12: 25$ |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |

Analytical Method: SM 2540C
Pace Analytical Services - Kansas City
Total Dissolved Solids
$4500 \mathrm{H}+\mathrm{pH}$, Electrometric
pH at 25 Degrees C
300.0 IC Anions 28 Days
$1010 \mathrm{mg} / \mathrm{L} \quad 13.3 \quad 1 \quad 03 / 12 / 21$ 15:24

Analytical Method: SM 4500-H+B
Pace Analytical Services - Kansas City
7.0 Std. Units $0.10 \quad 1 \quad$ 03/15/21 08:00 H6

Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City

| Chloride | $\mathbf{2 4 . 7}$ | $\mathrm{mg} / \mathrm{L}$ | 5.0 | 5 | $03 / 11 / 21$ | $20: 59$ |
| :--- | ---: | :--- | ---: | :---: | :---: | :---: |
| 16887-00-6 |  |  |  |  |  |  |
| Fluoride | 0.33 | $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 | $03 / 11 / 2120: 45$ | $16984-48-8$ |
| Sulfate | 408 | $\mathrm{mg} / \mathrm{L}$ | 50.0 | 50 | $03 / 11 / 21$ | $21: 14$ |

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60363071

| QC Batch: | 707888 | Analysis Method: | EPA 200.7 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 200.7 | Analysis Description: | 200.7 Metals, Total |
|  |  | Laboratory: | Pace Analytical Services - Kansas City |
| Associated Lab Samples: | $60363071001,60363071002,60363071003,60363071004,60363071005$ |  |  |


| METHOD BLANK: 2850767 |  | Matrix: Water |  |  | Qualifiers |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Associated Lab Samples: | 60363071001, 60363071002, 60363071003, 60363071004, 60363071005 |  |  |  |  |
| Parameter | Units | Blank <br> Result | Reporting Limit | Analyzed |  |
| Barium | mg/L | <0.0050 | 0.0050 | 03/16/21 13:53 |  |
| Boron | $\mathrm{mg} / \mathrm{L}$ | <0.10 | 0.10 | 03/16/21 13:53 |  |
| Calcium | mg/L | <0.20 | 0.20 | 03/16/21 13:53 |  |


| LABORATORY CONTROL SAMPLE: 2850768 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Barium | mg/L | 1 | 0.97 | 97 | 85-115 |  |
| Boron | $\mathrm{mg} / \mathrm{L}$ | 1 | 1.0 | 100 | 85-115 |  |
| Calcium | $\mathrm{mg} / \mathrm{L}$ | 10 | 9.8 | 98 | 85-115 |  |



| MATRIX SPIKE SAMPLE: | 2850771 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 60362965003 | Spike | MS | MS | \% Rec |  |
| Parameter | Units | Result | Conc. | Result | \% Rec | Limits | Qualifiers |
| Barium | mg/L | 0.063 | 1 | 1.0 | 98 | 70-130 |  |
| Boron | $\mathrm{mg} / \mathrm{L}$ | 0.44 | 1 | 1.5 | 101 | 70-130 |  |
| Calcium | $\mathrm{mg} / \mathrm{L}$ | 200 | 10 | 208 | 80 | 70-130 |  |

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60363071

| QC Batch: | 708124 | Analysis Method: | EPA 200.8 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 200.8 | Analysis Description: | 200.8 MET |
|  |  |  | Laboratory: |



| LABORATORY CONTROL SAMPLE: 2851834 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Cobalt | mg/L | 0.04 | 0.038 | 96 | 85-115 |  |
| Molybdenum | $\mathrm{mg} / \mathrm{L}$ | 0.04 | 0.039 | 98 | 85-115 |  |


| MATRIX SPIKE \& MATRIX SPIKE DUPLICATE: 2851835 |  |  |  |  | 2851836 |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | MS | MSD | MS | MSD | MS | MSD | \% Rec | Max |  |  |
|  | 60363071001 |  | Spike | Spike |  |  |  |  |  |  |  |  |
| Parameter | Units | Result | Conc. | Conc. | Result | Result | \% Rec | \% Rec | Limits | RPD | RPD | Qual |
| Cobalt | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.04 | 0.04 | 0.041 | 0.042 | 99 | 101 | 70-130 | 2 | 20 |  |
| Molybdenum | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.04 | 0.04 | 0.040 | 0.041 | 99 | 100 | 70-130 | 1 | 20 |  |

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60363071

| QC Batch: | 708275 | Analysis Method: | EPA 6010 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 3010 | Analysis Description: | 6010 MET |
|  |  | Laboratory: | Pace Analytical Services - Kansas City |
| Associated Lab Samples: | $60363071001,60363071002,60363071003,60363071004,60363071005$ |  |  |



| LABORATORY CONTROL SAMPLE: | 2852319 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Parameter |  |



## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60363071

| QC Batch: | 708388 | Analysis Method: | SM 2540C |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | SM 2540C | Analysis Description: | 2540C Total Dissolved Solids |
|  |  | Laboratory: | Pace Analytical Services - Kansas City |
| Associated Lab Samples: | $60363071001,60363071002,60363071003,60363071004,60363071005$ |  |  |



| LABORATORY CONTROL SAMPLE: 2852880 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Total Dissolved Solids | $\mathrm{mg} / \mathrm{L}$ | 1000 | 1010 | 101 | 80-120 |  |


| SAMPLE DUPLICATE: 2852881 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 60363029002 | Dup |  | Max |  |
| Parameter | Units | Result | Result | RPD | RPD | Qualifiers |
| Total Dissolved Solids | mg/L | 550 | 564 | 3 | 10 |  |

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60363071

| QC Batch: | 708498 | Analysis Method: | SM 4500-H+B |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | SM 4500-H+B | Analysis Description: | $4500 \mathrm{H}+\mathrm{B} \mathrm{pH}$ |
|  |  | Laboratory: | Pace Analytical Services - Kansas City |
| Associated Lab Samples: | $60363071001,60363071002,60363071003,60363071004,60363071005$ |  |  |


| SAMPLE DUPLICATE: 2853769 |
| :--- | :--- | :--- | :--- | :--- |
| Parameter |

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60363071

| QC Batch: | 707847 | Analysis Method: | EPA 300.0 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 300.0 | Analysis Description: | 300.0 IC Anions |
|  |  |  | Laboratory: |


| METHOD BLANK: 2850668 |  | Matrix: Water |  |  | Qualifiers |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Associated Lab Samples: | 60363071001, 60363071002, 60363071003, 60363071004, 60363071005 |  |  |  |  |
| Parameter | Units | Blank <br> Result | Reporting Limit | Analyzed |  |
| Chloride | mg/L | <1.0 | 1.0 | 03/10/21 09:38 |  |
| Fluoride | $\mathrm{mg} / \mathrm{L}$ | <0.20 | 0.20 | 03/10/21 09:38 |  |
| Sulfate | mg/L | <1.0 | 1.0 | 03/10/21 09:38 |  |


| METHOD BLANK: 2854934 |  | Matrix: Water |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Associated Lab Samples: | 60363071001, 60363071002, 60363071003, 60363071004, 60363071005 |  |  |  |  |
|  |  | Blank | Reporting |  |  |
| Parameter | Units | Result | Limit | Analyzed | Qualifiers |
| Chloride | $\mathrm{mg} / \mathrm{L}$ | <1.0 | 1.0 | 03/11/21 10:44 |  |
| Fluoride | $\mathrm{mg} / \mathrm{L}$ | <0.20 | 0.20 | 03/11/21 10:44 |  |
| Sulfate | $\mathrm{mg} / \mathrm{L}$ | <1.0 | 1.0 | 03/11/21 10:44 |  |


| LABORATORY CONTROL SAMPLE: 2850669 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Chloride | mg/L | 5 | 4.8 | 95 | 90-110 |  |
| Fluoride | $\mathrm{mg} / \mathrm{L}$ | 2.5 | 2.4 | 95 | 90-110 |  |
| Sulfate | $\mathrm{mg} / \mathrm{L}$ | 5 | 4.8 | 96 | 90-110 |  |


| LABORATORY CONTROL SAMPLE: 2854935 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Chloride | $\mathrm{mg} / \mathrm{L}$ | 5 | 4.9 | 97 | 90-110 |  |
| Fluoride | $\mathrm{mg} / \mathrm{L}$ | 2.5 | 2.4 | 97 | 90-110 |  |
| Sulfate | mg/L | 5 | 4.9 | 98 | 90-110 |  |



Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60363071

| MATRIX SPIKE SAMPLE: | 2850672 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameter | Units | $\begin{gathered} 60362783002 \\ \text { Recult } \end{gathered}$ | Spike <br> Conc. | MS <br> Result | $\begin{gathered} \text { MS } \\ \% \text { Rec } \end{gathered}$ | \% Rec Limits | Qualifiers |
| Chloride | mg/L | 269 | 100 | 385 | 116 | 80-120 |  |
| Fluoride | $\mathrm{mg} / \mathrm{L}$ | ND | 50 | 51.4 | 99 | 80-120 |  |
| Sulfate | $\mathrm{mg} / \mathrm{L}$ | 1930 | 1000 | 2950 | 102 | 80-120 |  |

## REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,

## QUALIFIERS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60363071 |

## DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.
ND - Not Detected at or above adjusted reporting limit.
TNTC - Too Numerous To Count
$J$ - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
MDL - Adjusted Method Detection Limit.
PQL - Practical Quantitation Limit.
RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.
S - Surrogate
1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.
Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate \% recovery and RPD values.
LCS(D) - Laboratory Control Sample (Duplicate)
MS(D) - Matrix Spike (Duplicate)
DUP - Sample Duplicate
RPD - Relative Percent Difference
NC - Not Calculable.
SG - Silica Gel - Clean-Up
U - Indicates the compound was analyzed for, but not detected.
N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.
Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.
TNI - The NELAC Institute.

## ANALYTE QUALIFIERS

H6 Analysis initiated outside of the 15 minute EPA required holding time.
M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project:
Pace Project No.: 60363071

| Lab ID | Sample ID | QC Batch Method | QC Batch | Analytical Method | Analytical Batch |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 60363071001 | MW-1-030821 | EPA 200.7 | 707888 | EPA 200.7 | 708029 |
| 60363071002 | MW-4-030821 | EPA 200.7 | 707888 | EPA 200.7 | 708029 |
| 60363071003 | MW-5-030821 | EPA 200.7 | 707888 | EPA 200.7 | 708029 |
| 60363071004 | MW-6-030821 | EPA 200.7 | 707888 | EPA 200.7 | 708029 |
| 60363071005 | DUP-322LF-030821 | EPA 200.7 | 707888 | EPA 200.7 | 708029 |
| 60363071001 | MW-1-030821 | EPA 3010 | 708275 | EPA 6010 | 708413 |
| 60363071002 | MW-4-030821 | EPA 3010 | 708275 | EPA 6010 | 708413 |
| 60363071003 | MW-5-030821 | EPA 3010 | 708275 | EPA 6010 | 708413 |
| 60363071004 | MW-6-030821 | EPA 3010 | 708275 | EPA 6010 | 708413 |
| 60363071005 | DUP-322LF-030821 | EPA 3010 | 708275 | EPA 6010 | 708413 |
| 60363071001 | MW-1-030821 | EPA 200.8 | 708124 | EPA 200.8 | 708211 |
| 60363071002 | MW-4-030821 | EPA 200.8 | 708124 | EPA 200.8 | 708211 |
| 60363071003 | MW-5-030821 | EPA 200.8 | 708124 | EPA 200.8 | 708211 |
| 60363071004 | MW-6-030821 | EPA 200.8 | 708124 | EPA 200.8 | 708211 |
| 60363071005 | DUP-322LF-030821 | EPA 200.8 | 708124 | EPA 200.8 | 708211 |
| 60363071001 | MW-1-030821 | SM 2540C | 708388 |  |  |
| 60363071002 | MW-4-030821 | SM 2540C | 708388 |  |  |
| 60363071003 | MW-5-030821 | SM 2540C | 708388 |  |  |
| 60363071004 | MW-6-030821 | SM 2540C | 708388 |  |  |
| 60363071005 | DUP-322LF-030821 | SM 2540C | 708388 |  |  |
| 60363071001 | MW-1-030821 | SM 4500-H+B | 708498 |  |  |
| 60363071002 | MW-4-030821 | SM 4500-H+B | 708498 |  |  |
| 60363071003 | MW-5-030821 | SM 4500-H+B | 708498 |  |  |
| 60363071004 | MW-6-030821 | SM 4500-H+B | 708498 |  |  |
| 60363071005 | DUP-322LF-030821 | SM 4500-H+B | 708498 |  |  |
| 60363071001 | MW-1-030821 | EPA 300.0 | 707847 |  |  |
| 60363071002 | MW-4-030821 | EPA 300.0 | 707847 |  |  |
| 60363071003 | MW-5-030821 | EPA 300.0 | 707847 |  |  |
| 60363071004 | MW-6-030821 | EPA 300.0 | 707847 |  |  |
| 60363071005 | DUP-322LF-030821 | EPA 300.0 | 707847 |  |  |

Pace Analytical www.pacelabs.com

## Client Name:

## Every hausas Central Inc

Courier: FedEx $\square$ UPS $\square$ VIA $\square$ Clay $\square$ PBX $\square$ ECU $\square$ Pace $\square$ Xroads $\square$ Client $\square$ Other $\square$
Tracking \#:
 Pace Shipping Label Used? Yes $\square$ No $\square$
Custody Seal on Cooler/Box Present: Yes No $\square \quad$ Seals intact: Yes $\not \subset \quad$ No $\square$


$\qquad$ Date: $\qquad$

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Section A
Section A
Required Client Information:

| Company: | EVERGY KANSAS CENTRAL, INC. |  |
| :--- | :--- | :--- |
| Address: | Tecumseh Energy Center (TEC) |  |
| 818 Kansas Ave, Topeka, KS 66612 |  |  |
| Email To: | andrew,hare@evergy.com |  |
| Phone: (785) 575-8428 | Fax |  |
| Requested Due Date/TAT: | 7 DAY |  |

Section B

| $\begin{array}{ll}\text { Section B } \\ \text { Required Project Information: } & \text { Section C } \\ \text { Invoice Information: }\end{array}$ |
| :--- | :--- |


| Report To: Andrew Hare, Melissa Michels, Samantha Kaney | Att |
| :--- | :--- | :--- |
| Copy To: Jared Morrison, Jake Humphrey, Laura Hines | Co |
| Melanie Satanek, Danielle Oberbroeckling | Ad |
| Purchase Order No: | Pac |
| Project Name: TEC 322 Landfill CCR | Re |
| Project Number: | Man |

Attention: Accounts Payable

| Company Name: EVERGY KANSAS CENTRAL, INd | REGULATORY AGENCY |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Address: SEE SECTION A | $\begin{aligned} & \Gamma \text { NPDES } \\ & \Gamma \text { UST } \end{aligned}$ | $\Gamma$ | GROUND WATER RCRA | ER | DRINKING WATER OTHER $\qquad$ |  |
| $\begin{array}{\|l} \hline \begin{array}{l} \text { Pace Quote } \\ \text { Reference: } \\ \hline \end{array} \\ \hline \end{array}$ |  |  |  |  |  |  |
| Pace Project Jasmine Amerin, 913-563-1403 | Site Location STATE: |  | KS |  |  |  |
| Pace Profile \#: 9656, 1 |  |  |  |  |  |  |  |  |



## ATTACHMENT 1-2

June 2021 Sampling Event Laboratory Analytical Report

July 15, 2021

Andrew Hare<br>Evergy, Inc.<br>818 Kansas Avenue<br>Topeka, KS 66612

## RE: Project: TEC 322 LANDFILL CCR <br> Pace Project No.: 60371392

Dear Andrew Hare:
Enclosed are the analytical results for sample(s) received by the laboratory on June 07, 2021. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Kansas City

Revised Report REV_1

If you have any questions concerning this report, please feel free to contact me.

Sincerely,


Jasmine Amerin
jasmine.amerin@pacelabs.com
(913)599-5665

Project Manager

Enclosures
cc: Laura Hines, Evergy, Inc. Heath Horyna, Evergy, Inc. Jake Humphrey, Evergy, Inc. Samantha Kaney, Haley \& Aldrich Melissa Michels, Evergy, Inc. Jared Morrison, Evergy, Inc. Danielle Oberbroeckling, Haley \& Aldrich Melanie Satanek, Haley \& Aldrich, Inc.

REPORT OF LABORATORY ANALYSIS

## CERTIFICATIONS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |

Pace Analytical Services Kansas
9608 Loiret Boulevard, Lenexa, KS 66219
Missouri Inorganic Drinking Water Certification \#: 10090
Arkansas Drinking Water
Arkansas Certification \#: 20-020-0
Arkansas Drinking Water
Illinois Certification \#: 200030
Iowa Certification \#: 118
Kansas/NELAP Certification \#: E-10116
Louisiana Certification \#: 03055

Nevada Certification \#: KS000212020-2
Oklahoma Certification \#: 9205/9935
Florida: Cert E871149 SEKS WET
Texas Certification \#: T104704407-19-12
Utah Certification \#: KS000212019-9
Illinois Certification \#: 004592
Kansas Field Laboratory Accreditation: \# E-92587
Missouri SEKS Micro Certification: 10070

## SAMPLE SUMMARY

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |


| Lab ID | Sample ID | Matrix | Date Collected | Date Received |
| :---: | :---: | :---: | :---: | :---: |
| 60371392001 | MW-1-060721 | Water | 06/07/21 10:30 | 06/07/21 15:50 |
| 60371392002 | MW-4-060721 | Water | 06/07/21 11:45 | 06/07/21 15:50 |
| 60371392003 | MW-5-060721 | Water | 06/07/21 13:10 | 06/07/21 15:50 |
| 60371392004 | MW-6-060721 | Water | 06/07/21 11:35 | 06/07/21 15:50 |
| 60371392005 | DUP-322LF-060721 | Water | 06/07/21 10:30 | 06/07/21 15:50 |

## SAMPLE ANALYTE COUNT

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |


| Lab ID | Sample ID | Method | Analysts | Analytes Reported | Laboratory |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 60371392001 | MW-1-060721 | EPA 200.7 | JDE | 4 | PASI-K |
|  |  | EPA 6010 | JDE | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 7 | PASI-K |
|  |  | EPA 245.1 | MRV | 1 | PASI-K |
|  |  | EPA 300.0 | CRN2 | 1 | PASI-K |
| 60371392002 | MW-4-060721 | EPA 200.7 | JDE | 4 | PASI-K |
|  |  | EPA 6010 | JDE | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 7 | PASI-K |
|  |  | EPA 245.1 | MRV | 1 | PASI-K |
|  |  | EPA 300.0 | CRN2 | 1 | PASI-K |
| 60371392003 | MW-5-060721 | EPA 200.7 | JDE | 4 | PASI-K |
|  |  | EPA 6010 | JDE | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 7 | PASI-K |
|  |  | EPA 245.1 | MRV | 1 | PASI-K |
|  |  | EPA 300.0 | CRN2 | 1 | PASI-K |
| 60371392004 | MW-6-060721 | EPA 200.7 | JDE | 4 | PASI-K |
|  |  | EPA 6010 | JDE | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 7 | PASI-K |
|  |  | EPA 245.1 | MRV | 1 | PASI-K |
|  |  | EPA 300.0 | CRN2 | 1 | PASI-K |
| 60371392005 | DUP-322LF-060721 | EPA 200.7 | JDE | 4 | PASI-K |
|  |  | EPA 6010 | JDE | 1 | PASI-K |
|  |  | EPA 200.8 | JGP | 7 | PASI-K |
|  |  | EPA 245.1 | MRV | 1 | PASI-K |
|  |  | EPA 300.0 | CRN2 | 1 | PASI-K |

PASI-K = Pace Analytical Services - Kansas City

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60371392
Date: July 15, 2021

Amended report revised to include redigested and reanalyzed mercury sample results.

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60371392
Method: EPA 200.7
Description: 200.7 Metals, Total
Client: Evergy Kansas Central, Inc.
Date: July 15, 2021

## General Information:

5 samples were analyzed for EPA 200.7 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Sample Preparation:

The samples were prepared in accordance with EPA 200.7 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |

Method: EPA 6010
Description: 6010 MET ICP
Client: Evergy Kansas Central, Inc.
Date: July 15, 2021

## General Information:

5 samples were analyzed for EPA 6010 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Sample Preparation:

The samples were prepared in accordance with EPA 3010 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |

Method: EPA 200.8
Description: 200.8 MET ICPMS
Client: Evergy Kansas Central, Inc.
Date: July 15, 2021

## General Information:

5 samples were analyzed for EPA 200.8 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Sample Preparation:

The samples were prepared in accordance with EPA 200.8 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60371392

## Method: EPA 245.1

Description: 245.1 Mercury
Client: Evergy Kansas Central, Inc.
Date: July 15, 2021

## General Information:

5 samples were analyzed for EPA 245.1 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.
H1: Analysis conducted outside the EPA method holding time.

- DUP-322LF-060721 (Lab ID: 60371392005)
- MW-1-060721 (Lab ID: 60371392001)
- MW-4-060721 (Lab ID: 60371392002)
- MW-5-060721 (Lab ID: 60371392003)
- MW-6-060721 (Lab ID: 60371392004)
H2: Extraction or preparation conducted outside EPA method holding time.
- DUP-322LF-060721 (Lab ID: 60371392005)
- MW-1-060721 (Lab ID: 60371392001)
- MW-4-060721 (Lab ID: 60371392002)
- MW-5-060721 (Lab ID: 60371392003)
- MW-6-060721 (Lab ID: 60371392004)


## Sample Preparation:

The samples were prepared in accordance with EPA 245.1 with any exceptions noted below.

## Initial Calibrations (including MS Tune as applicable):

All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

## Additional Comments:

## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60371392
Method: EPA 300.0
Description: 300.0 IC Anions 28 Days
Client: Evergy Kansas Central, Inc.
Date: July 15, 2021

## General Information:

5 samples were analyzed for EPA 300.0 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:
All duplicate sample results were within method acceptance criteria with any exceptions noted below.

## Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |


| Sample: MW-1-060721 | Lab ID: 60371392001 |  | Collected: 06/07/21 10:30 |  | Received: 06/07/21 15:50 |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
|  | Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.087 | mg/L | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:05 | 7440-39-3 |  |
| Beryllium, Total Recoverable | <0.0010 | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | 06/08/21 16:57 | 06/10/21 16:05 | 7440-41-7 |  |
| Chromium, Total Recoverable | <0.0050 | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:05 | 7440-47-3 |  |
| Lead, Total Recoverable | <0.010 | mg/L | 0.010 | 1 | 06/08/21 16:57 | 06/10/21 16:05 | 7439-92-1 |  |

Analytical Method: EPA 6010 Preparation Method: EPA 3010
Pace Analytical Services - Kansas City
$\begin{array}{llllllllllllllll}<0.010 & \mathrm{mg} / \mathrm{L} & 0.010 & 1 & 06 / 09 / 21 & 10: 07 & 06 / 10 / 21 & 16: 25 & 7439-93-2\end{array}$
Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City
Antimony, Total Recoverable Arsenic, Total Recoverable Cadmium, Total Recoverable Cobalt, Total Recoverable Molybdenum, Total Recoverable Selenium, Total Recoverable Thallium, Total Recoverable

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2114: 51$ | $7440-36-0$ |
| ---: | :--- | ---: | :--- | :--- | :--- | :--- | :--- |
| $\mathbf{0 . 0 0 1 3}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2114: 51$ | $7440-38-2$ |
| $<\mathbf{0 . 0 0 0 5 0}$ | $\mathrm{mg} / \mathrm{L}$ | 0.00050 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2114: 51$ | $7440-43-9$ |
| $\mathbf{0 . 0 0 1 4}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2114: 51$ | $7440-48-4$ |
| $<\mathbf{0 . 0 0 1 0}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2114: 51$ | $7439-98-7$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2114: 51$ | $7782-49-2$ |
| $<\mathbf{0 . 0 0 1 0}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2114: 51$ | $7440-28-0$ |

### 245.1 Mercury

Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City

## Mercury

300.0 IC Anions 28 Days

Fluoride
$\begin{array}{lllllllllllll}<0.20 & u g / L & 0.20 & 1 & 07 / 12 / 21 & 15: 36 & 07 / 13 / 21 & 13: 03 & 7439-97-6 & H 1, H 2\end{array}$
Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City
$\begin{array}{llllllllll}<0.20 & \mathrm{mg} / \mathrm{L} & 0.20 & 1 & 06 / 15 / 21 & 12: 51 & 16984-48-8\end{array}$

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |


| Sample: MW-4-060721 | Lab ID: 60371392002 |  | Collected: 06/07/21 11:45 |  | Received: 06/07/21 15:50 |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
|  | Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.098 | mg/L | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:07 | 7440-39-3 |  |
| Beryllium, Total Recoverable | <0.0010 | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | 06/08/21 16:57 | 06/10/21 16:07 | 7440-41-7 |  |
| Chromium, Total Recoverable | <0.0050 | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:07 | 7440-47-3 |  |
| Lead, Total Recoverable | <0.010 | mg/L | 0.010 | 1 | 06/08/21 16:57 | 06/10/21 16:07 | 7439-92-1 |  |

Analytical Method: EPA 6010 Preparation Method: EPA 3010
Pace Analytical Services - Kansas City

```
<0.010 mg/L 0.010 1 06/09/21 10:07 06/10/21 16:27 7439-93-2
```

Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City
Antimony, Total Recoverable Arsenic, Total Recoverable Cadmium, Total Recoverable Cobalt, Total Recoverable Molybdenum, Total Recoverable Selenium, Total Recoverable Thallium, Total Recoverable

### 245.1 Mercury

Mercury
300.0 IC Anions 28 Days

Fluoride

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 06$ | $7440-36-0$ |
| ---: | :--- | ---: | :--- | :--- | :--- | :--- | :--- |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 06$ | $7440-38-2$ |
| $<0.00050$ | $\mathrm{mg} / \mathrm{L}$ | 0.00050 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 06$ | $7440-43-9$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 06$ | $7440-48-4$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 06$ | $7439-98-7$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 06$ | $7782-49-2$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 06$ | $7440-28-0$ |

Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City
$\begin{array}{llllllllllllllllll}<0.20 & u g / L & 0.20 & 1 & 07 / 12 / 21 & 15: 36 & 07 / 13 / 21 & 13: 05 & 7439-97-6 & \mathrm{H} 1, \mathrm{H} 2\end{array}$
Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City
$\begin{array}{lllllll}<0.20 & \mathrm{mg} / \mathrm{L} & 0.20 & 1 & 06 / 15 / 21 & 13: 03 & 16984-48-8\end{array}$

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |


| Sample: MW-5-060721 | Lab ID: 60371392003 |  | Collected: 06/07/21 13:10 |  | Received: 06/07/21 15:50 |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
|  | Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.019 | mg/L | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:10 | 7440-39-3 |  |
| Beryllium, Total Recoverable | <0.0010 | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | 06/08/21 16:57 | 06/10/21 16:10 | 7440-41-7 |  |
| Chromium, Total Recoverable | <0.0050 | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:10 | 7440-47-3 |  |
| Lead, Total Recoverable | <0.010 | mg/L | 0.010 | 1 | 06/08/21 16:57 | 06/10/21 16:10 | 7439-92-1 |  |

Analytical Method: EPA 6010 Preparation Method: EPA 3010
Pace Analytical Services - Kansas City

```
<0.010 mg/L 0.010 1 06/09/21 10:07 06/10/21 16:35 7439-93-2
```

Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City
Antimony, Total Recoverable Arsenic, Total Recoverable Cadmium, Total Recoverable Cobalt, Total Recoverable Molybdenum, Total Recoverable Selenium, Total Recoverable Thallium, Total Recoverable

### 245.1 Mercury

Mercury
300.0 IC Anions 28 Days

Fluoride

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 09$ | $7440-36-0$ |
| ---: | :--- | ---: | :--- | :--- | :--- | :--- | :--- |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 09$ | $7440-38-2$ |
| $<0.00050$ | $\mathrm{mg} / \mathrm{L}$ | 0.00050 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 09$ | $7440-43-9$ |
| $\mathbf{0 . 0 0 1 8}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 09$ | $7440-48-4$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 09$ | $7439-98-7$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 09$ | $7782-49-2$ |
| $<\mathbf{< 0 . 0 0 1 0}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 09$ | $7440-28-0$ |

Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City
$\begin{array}{lllllllllllllllll}<0.20 & u g / L & 0.20 & 1 & 07 / 12 / 21 & 15: 36 & 07 / 13 / 21 & 13: 12 & 7439-97-6 & \mathrm{H} 1, \mathrm{H} 2\end{array}$
Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City
<0.20 mg/L 0.20
06/15/21 13:15 16984-48-8

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |


| Sample: MW-6-060721 | Lab ID: 60371392004 |  | Collected: 06/07/21 11:35 |  | Received: 06/07/21 15:50 |  | Matrix: Water |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
| Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.018 | mg/L | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:12 | 7440-39-3 |  |
| Beryllium, Total Recoverable | <0.0010 | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | 06/08/21 16:57 | 06/10/21 16:12 | 7440-41-7 |  |
| Chromium, Total Recoverable | <0.0050 | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:12 | 7440-47-3 |  |
| Lead, Total Recoverable | <0.010 | mg/L | 0.010 | 1 | 06/08/21 16:57 | 06/10/21 16:12 | 7439-92-1 |  |

Analytical Method: EPA 6010 Preparation Method: EPA 3010
Pace Analytical Services - Kansas City

```
<0.010 mg/L 0.010 1 06/09/21 10:07 06/10/21 16:37 7439-93-2
```

Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City
Antimony, Total Recoverable Arsenic, Total Recoverable Cadmium, Total Recoverable Cobalt, Total Recoverable Molybdenum, Total Recoverable Selenium, Total Recoverable Thallium, Total Recoverable

### 245.1 Mercury

Mercury
300.0 IC Anions 28 Days

Fluoride

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 13$ | $7440-36-0$ |
| ---: | :--- | ---: | :--- | :--- | :--- | :--- | :--- |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 13$ | $7440-38-2$ |
| $<0.00050$ | $\mathrm{mg} / \mathrm{L}$ | 0.00050 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 13$ | $7440-43-9$ |
| $\mathbf{0 . 0 0 2 2}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 13$ | $7440-48-4$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 13$ | $7439-98-7$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 13$ | $7782-49-2$ |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 13$ | $7440-28-0$ |

Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City
$\begin{array}{llllllllllllllllll}<0.20 & u g / L & 0.20 & 1 & 07 / 12 / 21 & 15: 36 & 07 / 13 / 21 & 13: 14 & 7439-97-6 & \mathrm{H} 1, \mathrm{H} 2\end{array}$
Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |


| Sample: DUP-322LF-060721 | Lab ID: 60371392005 |  | Collected: 06/07/21 10:30 |  | Received: 06/07/21 15:50 |  | Matrix: Water |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
| Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.083 | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:15 | 7440-39-3 |  |
| Beryllium, Total Recoverable | <0.0010 | mg/L | 0.0010 | 1 | 06/08/21 16:57 | 06/10/21 16:15 | 7440-41-7 |  |
| Chromium, Total Recoverable | $<0.0050$ | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 06/08/21 16:57 | 06/10/21 16:15 | 7440-47-3 |  |
| Lead, Total Recoverable | <0.010 | $\mathrm{mg} / \mathrm{L}$ | 0.010 | 1 | 06/08/21 16:57 | 06/10/21 16:15 | 7439-92-1 |  |

Analytical Method: EPA 6010 Preparation Method: EPA 3010
Pace Analytical Services - Kansas City

```
<0.010 mg/L 0.010 1 06/09/21 10:07 06/10/21 16:40 7439-93-2
```

Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City
Antimony, Total Recoverable Arsenic, Total Recoverable Cadmium, Total Recoverable Cobalt, Total Recoverable Molybdenum, Total Recoverable Selenium, Total Recoverable Thallium, Total Recoverable

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 21$ | $10: 07$ | $06 / 14 / 21$ | $15: 16$ |
| ---: | :--- | ---: | :--- | :--- | :--- | :--- | :--- |
| $7440-36-0$ |  |  |  |  |  |  |  |
| $\mathbf{0 . 0 0 1 3}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 21$ | $10: 07$ | $06 / 14 / 21$ | $15: 16$ |
| $7440-38-2$ |  |  |  |  |  |  |  |
| $<0.00050$ | $\mathrm{mg} / \mathrm{L}$ | 0.00050 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 16$ | $7440-43-9$ |  |
| $\mathbf{0 . 0 0 1 4}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 16$ | $7440-48-4$ |  |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 16$ | $7439-98-7$ |  |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 16$ | $7782-49-2$ |  |
| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $06 / 09 / 2110: 07$ | $06 / 14 / 2115: 16$ | $7440-28-0$ |  |

### 245.1 Mercury

Mercury
300.0 IC Anions 28 Days

Fluoride
Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City
$\begin{array}{lllllllllllllll}<0.20 & u g / L & 0.20 & 1 & 07 / 12 / 21 & 15: 36 & 07 / 13 / 21 & 13: 17 & 7439-97-6 & \mathrm{H} 1, \mathrm{H} 2\end{array}$
Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City

$$
\begin{array}{lll}
<0.20 \mathrm{mg} / \mathrm{L} & 0.20
\end{array}
$$

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60371392

| QC Batch: | 731490 | Analysis Method: | EPA 245.1 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 245.1 | Analysis Description: | 245.1 Mercury |
|  |  | Laboratory: | Pace Analytical Services - Kansas City |
| Associated Lab Samples: | $60371392001,60371392002,60371392003,60371392004,60371392005$ |  |  |



| LABORATORY CONTROL SAMPLE: 2936643 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Mercury | ug/L | 5 | 4.9 | 97 | 85-115 |  |



| MATRIX SPIKE SAMPLE: | 2936646 |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameter |  |

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR
Pace Project No.: 60371392

| QC Batch: | 725170 | Analysis Method: | EPA 200.7 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 200.7 | Analysis Description: | 200.7 Metals, Total |
|  |  | Laboratory: | Pace Analytical Services - Kansas City |
| Associated Lab Samples: | $60371392001,60371392002,60371392003,60371392004,60371392005$ |  |  |


| METHOD BLANK: 2914197 Matrix: Water |  |  |  |  | Qualifiers |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Associated Lab Samples: | 60371392001, 60371392002, 60371392003, 60371392004, 60371392005 |  |  |  |  |
| Parameter | Units | Blank Result | Reporting Limit | Analyzed |  |
| Barium | $\mathrm{mg} / \mathrm{L}$ | <0.0050 | 0.0050 | 06/09/21 19:53 |  |
| Beryllium | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.0010 | 06/09/21 19:53 |  |
| Chromium | $\mathrm{mg} / \mathrm{L}$ | <0.0050 | 0.0050 | 06/09/21 19:53 |  |
| Lead | $\mathrm{mg} / \mathrm{L}$ | <0.010 | 0.010 | 06/09/21 19:53 |  |

LABORATORY CONTROL SAMPLE: 2914198

| Parameter | Units | Spike <br> Conc. | LCS Result | $\begin{gathered} \text { LCS } \\ \text { \% Rec } \end{gathered}$ | \% Rec <br> Limits | Qualifiers |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Barium | mg/L | 1 | 1.0 | 104 | 85-115 |  |
| Beryllium | $\mathrm{mg} / \mathrm{L}$ | 1 | 1.1 | 105 | 85-115 |  |
| Chromium | $\mathrm{mg} / \mathrm{L}$ | 1 | 1.1 | 105 | 85-115 |  |
| Lead | $\mathrm{mg} / \mathrm{L}$ | 1 | 1.1 | 107 | 85-115 |  |


| MATRIX SPIKE SAMPLE: | 2914199 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 60371064003 | Spike | MS | MS | \% Rec |  |
| Parameter | Units | Result | Conc. | Result | \% Rec | Limits | Qualifiers |
| Barium | mg/L | 134 ug/L | 1 | 1.3 | 113 | 70-130 |  |
| Beryllium | $\mathrm{mg} / \mathrm{L}$ | ND | 1 | 1.1 | 114 | 70-130 |  |
| Chromium | $\mathrm{mg} / \mathrm{L}$ | ND | 1 | 1.1 | 113 | 70-130 |  |
| Lead | mg/L | ND | 1 | 1.1 | 113 | 70-130 |  |



Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

## Project:

TEC 322 LANDFILL CCR
Pace Project No.: 60371392

| QC Batch: | 725230 | Analysis Method: | EPA 200.8 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 200.8 | Analysis Description: | 200.8 MET |
|  |  | Laboratory: | Pace Analytical Services - Kansas City |
| Associated Lab Samples: | $60371392001,60371392002,60371392003,60371392004,60371392005$ |  |  |


| METHOD BLANK: 2914312 |  | Matrix: Water |  |  | Qualifiers |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Associated Lab Samples: | 037139 | 71392003, 6 | 371392004, 60 | 371392005 |  |
| Parameter | Units | Blank <br> Result | Reporting Limit | Analyzed |  |
| Antimony | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.0010 | 06/14/21 14:13 |  |
| Arsenic | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.0010 | 06/14/21 14:13 |  |
| Cadmium | $\mathrm{mg} / \mathrm{L}$ | <0.00050 | 0.00050 | 06/14/21 14:13 |  |
| Cobalt | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.0010 | 06/14/21 14:13 |  |
| Molybdenum | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.0010 | 06/14/21 14:13 |  |
| Selenium | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.0010 | 06/14/21 14:13 |  |
| Thallium | mg/L | <0.0010 | 0.0010 | 06/14/21 14:13 |  |


| LABORATORY CONTROL SAMPLE: 2914313 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameter | Units | Spike Conc. | LCS <br> Result | $\begin{gathered} \text { LCS } \\ \% \text { Rec } \end{gathered}$ | \% Rec Limits | Qualifiers |
| Antimony | mg/L | 0.04 | 0.042 | 104 | 85-115 |  |
| Arsenic | $\mathrm{mg} / \mathrm{L}$ | 0.04 | 0.043 | 107 | 85-115 |  |
| Cadmium | $\mathrm{mg} / \mathrm{L}$ | 0.04 | 0.043 | 108 | 85-115 |  |
| Cobalt | $\mathrm{mg} / \mathrm{L}$ | 0.04 | 0.040 | 100 | 85-115 |  |
| Molybdenum | $\mathrm{mg} / \mathrm{L}$ | 0.04 | 0.043 | 107 | 85-115 |  |
| Selenium | mg/L | 0.04 | 0.043 | 107 | 85-115 |  |
| Thallium | $\mathrm{mg} / \mathrm{L}$ | 0.04 | 0.042 | 104 | 85-115 |  |


| MATRIX SPIKE SAMPLE: | 2914314 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Units | $60371062001$ <br> Result | Spike | MS Result | $\begin{gathered} \text { MS } \\ \% \text { Rec } \end{gathered}$ | \% Rec Limits | Qualifiers |
| Antimony | mg/L | ND | 0.04 | 0.040 | 99 | 70-130 |  |
| Arsenic | $\mathrm{mg} / \mathrm{L}$ | 2.1 ug/L | 0.04 | 0.042 | 101 | 70-130 |  |
| Cadmium | $\mathrm{mg} / \mathrm{L}$ | ND | 0.04 | 0.039 | 96 | 70-130 |  |
| Cobalt | $\mathrm{mg} / \mathrm{L}$ | ND | 0.04 | 0.036 | 89 | 70-130 |  |
| Molybdenum | $\mathrm{mg} / \mathrm{L}$ | 5.5 ug/L | 0.04 | 0.047 | 103 | 70-130 |  |
| Selenium | $\mathrm{mg} / \mathrm{L}$ | ND | 0.04 | 0.037 | 89 | 70-130 |  |
| Thallium | $\mathrm{mg} / \mathrm{L}$ | ND | 0.04 | 0.037 | 92 | 70-130 |  |



Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60371392

| MATRIX SPIKE \& MATRIX SPIKE DUPLICATE: |  |  |  |  | 2914316 |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | MS MSD |  |  |  |  |  |  |  |  |  |
|  | 60371392001 |  | Spike | Spike | MS | MSD | MS | MSD | \% Rec |  | Max |  |
| Parameter | Units | Result | Conc. | Conc. | Result | Result | \% Rec | \% Rec | Limits | RPD | RPD | Qual |
| Cadmium | mg/L | <0.00050 | 0.04 | 0.04 | 0.038 | 0.039 | 95 | 97 | 70-130 | 2 | 20 |  |
| Cobalt | $\mathrm{mg} / \mathrm{L}$ | 0.0014 | 0.04 | 0.04 | 0.036 | 0.037 | 87 | 89 | 70-130 | 3 | 20 |  |
| Molybdenum | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.04 | 0.04 | 0.042 | 0.043 | 103 | 106 | 70-130 | 3 | 20 |  |
| Selenium | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.04 | 0.04 | 0.035 | 0.036 | 87 | 89 | 70-130 | 2 | 20 |  |
| Thallium | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.04 | 0.04 | 0.037 | 0.038 | 91 | 94 | 70-130 | 3 | 20 |  |

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60371392

| QC Batch: | 725232 | Analysis Method: | EPA 6010 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 3010 | Analysis Description: | 6010 MET |
|  |  |  | Laboratory: |



| LABORATORY CONTROL SAMPLE: | 2914323 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Parameter |  |



## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60371392

| QC Batch: | 726105 | Analysis Method: | EPA 300.0 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 300.0 | Analysis Description: | 300.0 IC Anions |
|  |  |  | Laboratory: |


| METHOD BLANK: 2917706 |  | Matrix: Water |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Associated Lab Samples: | 60371392001, 60371392002, 60371392003, 60371392004, 60371392005 |  |  |  |  |
|  |  | Blank | Reporting |  |  |
| Parameter | Units | Result | Limit | Analyzed | Qualifiers |
| Fluoride | $\mathrm{mg} / \mathrm{L}$ | <0.20 | 0.2 | /14/21 17:08 |  |


| METHOD BLANK: 2919317 |  | Matrix: Water |  |  | Qualifiers |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Associated Lab Samples | 60371392001, 60371392002, 60371392003, 60371392004, 60371392005 |  |  |  |  |
| Parameter | Units | Blank <br> Result | Reporting Limit | Analyzed |  |
| Fluoride | mg/L | <0.20 | 0.20 | 6/15/21 08:03 |  |


| LABORATORY CONTROL SAMPLE: | 2917707 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Parameter |  |


| LABORATORY CONTROL SAMPLE: | 2919318 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Parameter |  |


| MATRIX SPIKE SAMPLE: | 2917708 |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Parameter |


| MATRIX SPIKE \& MATRIX SPIKE DUPLICATE: 2917709 |  |  |  |  | 2917710 |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | MS | MSD |  |  |  |  |  |  |  |  |
|  |  | 60371297006 | Spike | Spike | MS | MSD | MS | MSD | \% Rec | Max |  |  |
| Parameter | Units | Result | Conc. | Conc. | Result | Result | \% Rec | \% Rec | Limits | RPD | RPD | Qual |
| Fluoride | mg/L | 0.57 | 2.5 | 2.5 | 2.9 | 2.7 | 94 | 87 | 80-120 | 6 | 15 |  |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60371392

| SAMPLE DUPLICATE: 2917711 |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
|  | Parameter |

## QUALIFIERS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60371392 |

## DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.
ND - Not Detected at or above adjusted reporting limit.
TNTC - Too Numerous To Count
$J$ - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
MDL - Adjusted Method Detection Limit.
PQL - Practical Quantitation Limit.
RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.
S - Surrogate
1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.
Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate \% recovery and RPD values.
LCS(D) - Laboratory Control Sample (Duplicate)
MS(D) - Matrix Spike (Duplicate)
DUP - Sample Duplicate
RPD - Relative Percent Difference
NC - Not Calculable.
SG - Silica Gel - Clean-Up
U - Indicates the compound was analyzed for, but not detected.
N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.
Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.
TNI - The NELAC Institute.

## ANALYTE QUALIFIERS

$\begin{array}{ll}\mathrm{H} 1 & \text { Analysis conducted outside the EPA method holding time. } \\ \mathrm{H} 2 & \text { Extraction or preparation conducted outside EPA method holding time. }\end{array}$

## QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project:
Pace Project No.: 60371392

| Lab ID | Sample ID | QC Batch Method | QC Batch | Analytical Method | Analytical Batch |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 60371392001 | MW-1-060721 | EPA 200.7 | 725170 | EPA 200.7 | 725221 |
| 60371392002 | MW-4-060721 | EPA 200.7 | 725170 | EPA 200.7 | 725221 |
| 60371392003 | MW-5-060721 | EPA 200.7 | 725170 | EPA 200.7 | 725221 |
| 60371392004 | MW-6-060721 | EPA 200.7 | 725170 | EPA 200.7 | 725221 |
| 60371392005 | DUP-322LF-060721 | EPA 200.7 | 725170 | EPA 200.7 | 725221 |
| 60371392001 | MW-1-060721 | EPA 3010 | 725232 | EPA 6010 | 725383 |
| 60371392002 | MW-4-060721 | EPA 3010 | 725232 | EPA 6010 | 725383 |
| 60371392003 | MW-5-060721 | EPA 3010 | 725232 | EPA 6010 | 725383 |
| 60371392004 | MW-6-060721 | EPA 3010 | 725232 | EPA 6010 | 725383 |
| 60371392005 | DUP-322LF-060721 | EPA 3010 | 725232 | EPA 6010 | 725383 |
| 60371392001 | MW-1-060721 | EPA 200.8 | 725230 | EPA 200.8 | 725381 |
| 60371392002 | MW-4-060721 | EPA 200.8 | 725230 | EPA 200.8 | 725381 |
| 60371392003 | MW-5-060721 | EPA 200.8 | 725230 | EPA 200.8 | 725381 |
| 60371392004 | MW-6-060721 | EPA 200.8 | 725230 | EPA 200.8 | 725381 |
| 60371392005 | DUP-322LF-060721 | EPA 200.8 | 725230 | EPA 200.8 | 725381 |
| 60371392001 | MW-1-060721 | EPA 245.1 | 731490 | EPA 245.1 | 731688 |
| 60371392002 | MW-4-060721 | EPA 245.1 | 731490 | EPA 245.1 | 731688 |
| 60371392003 | MW-5-060721 | EPA 245.1 | 731490 | EPA 245.1 | 731688 |
| 60371392004 | MW-6-060721 | EPA 245.1 | 731490 | EPA 245.1 | 731688 |
| 60371392005 | DUP-322LF-060721 | EPA 245.1 | 731490 | EPA 245.1 | 731688 |
| 60371392001 | MW-1-060721 | EPA 300.0 | 726105 |  |  |
| 60371392002 | MW-4-060721 | EPA 300.0 | 726105 |  |  |
| 60371392003 | MW-5-060721 | EPA 300.0 | 726105 |  |  |
| 60371392004 | MW-6-060721 | EPA 300.0 | 726105 |  |  |
| 60371392005 | DUP-322LF-060721 | EPA 300.0 | 726105 |  |  |

## REPORT OF LABORATORY ANALYSIS



## Sample Condition Upon Receipt



[^0]$\qquad$ Date: $\qquad$


July 06, 2021

Andrew Hare<br>Evergy, Inc.<br>818 Kansas Avenue<br>Topeka, KS 66612

```
RE: Project: TEC 322 Landfill CCR
    Pace Project No.: }6037205
```

Dear Andrew Hare:
Enclosed are the analytical results for sample(s) received by the laboratory on June 08, 2021. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Greensburg

If you have any questions concerning this report, please feel free to contact me.

Sincerely,


Jasmine Amerin
jasmine.amerin@pacelabs.com
(913)599-5665

Project Manager

Enclosures
cc: Laura Hines, Evergy, Inc.
Heath Horyna, Evergy, Inc.
Jake Humphrey, Evergy, Inc.
Samantha Kaney, Haley \& Aldrich
Melissa Michels, Evergy, Inc.
Jared Morrison, Evergy, Inc.
Danielle Oberbroeckling, Haley \& Aldrich
Melanie Satanek, Haley \& Aldrich, Inc.

REPORT OF LABORATORY ANALYSIS

## CERTIFICATIONS

| Project: | TEC 322 Landfill CCR |
| :--- | :--- |
| Pace Project No.: | 60372053 |

Pace Analytical Services Pennsylvania
1638 Roseytown Rd Suites 2,3\&4, Greensburg, PA 15601
ANAB DOD-ELAP Rad Accreditation \#: L2417
Alabama Certification \#: 41590
Arizona Certification \#: AZ0734
Arkansas Certification
California Certification \#: 04222CA
Colorado Certification \#: PA01547
Connecticut Certification \#: PH-0694
Delaware Certification
EPA Region 4 DW Rad
Florida/TNI Certification \#: E87683
Georgia Certification \#: C040
Florida: Cert E871149 SEKS WET
Guam Certification
Hawaii Certification
Idaho Certification
Illinois Certification
Indiana Certification
Iowa Certification \#: 391
Kansas/TNI Certification \#: E-10358
Kentucky Certification \#: KY90133
KY WW Permit \#: KY0098221
KY WW Permit \#: KY0000221
Louisiana DHH/TNI Certification \#: LA180012
Louisiana DEQ/TNI Certification \#: 4086
Maine Certification \#: 2017020
Maryland Certification \#: 308
Massachusetts Certification \#: M-PA1457
Michigan/PADEP Certification \#: 9991

Missouri Certification \#: 235
Montana Certification \#: Cert0082
Nebraska Certification \#: NE-OS-29-14
Nevada Certification \#: PA014572018-1
New Hampshire/TNI Certification \#: 297617
New Jersey/TNI Certification \#: PA051
New Mexico Certification \#: PA01457
New York/TNI Certification \#: 10888
North Carolina Certification \#: 42706
North Dakota Certification \#: R-190
Ohio EPA Rad Approval: \#41249
Oregon/TNI Certification \#: PA200002-010
Pennsylvania/TNI Certification \#: 65-00282
Puerto Rico Certification \#: PA01457
Rhode Island Certification \#: 65-00282
South Dakota Certification
Tennessee Certification \#: 02867
Texas/TNI Certification \#: T104704188-17-3
Utah/TNI Certification \#: PA014572017-9
USDA Soil Permit \#: P330-17-00091
Vermont Dept. of Health: ID\# VT-0282
Virgin Island/PADEP Certification
Virginia/VELAP Certification \#: 9526
Washington Certification \#: C868
West Virginia DEP Certification \#: 143
West Virginia DHHR Certification \#: 9964C
Wisconsin Approve List for Rad
Wyoming Certification \#: 8TMS-L

## SAMPLE SUMMARY

| Project: | TEC 322 Landfill CCR |
| :--- | :--- |
| Pace Project No.: | 60372053 |


| Lab ID | Sample ID | Matrix | Date Collected | Date Received |
| :---: | :---: | :---: | :---: | :---: |
| 60372053001 | MW-1-060721 | Water | 06/07/21 10:30 | 06/08/21 10:15 |
| 60372053002 | MW-4-060721 | Water | 06/07/21 11:15 | 06/08/21 10:15 |
| 60372053003 | MW-5-060721 | Water | 06/07/21 13:10 | 06/08/21 10:15 |
| 60372053004 | MW-6-060721 | Water | 06/07/21 11:35 | 06/08/21 10:15 |
| 60372053005 | DUP-382LF-060721 | Water | 06/07/21 10:30 | 06/08/21 10:15 |

## SAMPLE ANALYTE COUNT

| Project: | TEC 322 Landfill CCR |
| :--- | :--- |
| Pace Project No.: | 60372053 |


| Lab ID | Sample ID | Method | Analysts | Analytes Reported | Laboratory |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 60372053001 | MW-1-060721 | EPA 903.1 | MK1 | 1 | PASI-PA |
|  |  | EPA 904.0 | VAL | 1 | PASI-PA |
|  |  | Total Radium Calculation | RMK | 1 | PASI-PA |
| 60372053002 | MW-4-060721 | EPA 903.1 | MK1 | 1 | PASI-PA |
|  |  | EPA 904.0 | VAL | 1 | PASI-PA |
|  |  | Total Radium Calculation | RMK | 1 | PASI-PA |
| 60372053003 | MW-5-060721 | EPA 903.1 | MK1 | 1 | PASI-PA |
|  |  | EPA 904.0 | VAL | 1 | PASI-PA |
|  |  | Total Radium Calculation | RMK | 1 | PASI-PA |
| 60372053004 | MW-6-060721 | EPA 903.1 | MK1 | 1 | PASI-PA |
|  |  | EPA 904.0 | VAL | 1 | PASI-PA |
|  |  | Total Radium Calculation | RMK | 1 | PASI-PA |
| 60372053005 | DUP-382LF-060721 | EPA 903.1 | MK1 | 1 | PASI-PA |
|  |  | EPA 904.0 | VAL | 1 | PASI-PA |
|  |  | Total Radium Calculation | RMK | 1 | PASI-PA |

PASI-PA = Pace Analytical Services - Greensburg

## PROJECT NARRATIVE

| Project: | TEC 322 Landfill CCR |
| :--- | :--- |
| Pace Project No.: | 60372053 |

Method: EPA 903.1
Description: 903.1 Radium 226
Client: Evergy Kansas Central, Inc.
Date: July 06, 2021

## General Information:

5 samples were analyzed for EPA 903.1 by Pace Analytical Services Greensburg. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## PROJECT NARRATIVE

| Project: | TEC 322 Landfill CCR |
| :--- | :--- |
| Pace Project No.: | 60372053 |


| Method: | EPA 904.0 |
| :--- | :--- |
| Description: | 904.0 Radium 228 |
| Client: | Evergy Kansas Central, Inc. |
| Date: | July 06, 2021 |

## General Information:

5 samples were analyzed for EPA 904.0 by Pace Analytical Services Greensburg. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

## Additional Comments:

Analyte Comments:
QC Batch: 452699
1e: Analyte detected in Method Blank above reporting limit of $1.0 \mathrm{pCi} / \mathrm{L}$. Samples with activity results below their associated MDC or the client RDL are reportable without qualification.

- DUP-382LF-060721 (Lab ID: 60372053005)
- Radium-228
- MW-1-060721 (Lab ID: 60372053001)
- Radium-228
- MW-4-060721 (Lab ID: 60372053002)
- Radium-228
- MW-5-060721 (Lab ID: 60372053003)
- Radium-228
- MW-6-060721 (Lab ID: 60372053004)
- Radium-228

2e: Analyte detected in Method Blank above reporting limit of $1.0 \mathrm{pCi} / \mathrm{L}$. Samples with activity results below their associated MDC or the client RDL are reportable without qualification.
Results for sample with activity greater than the client RDL may be qualified.

- BLANK (Lab ID: 2185412)
- Radium-228

3e: Method Blank re-analyzed due to activity > MDC. Re-analysis results are satisfactory.

- BLANK (Lab ID: 2185412)
- Radium-228


## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

| Project: | TEC 322 Landfill CCR |
| :--- | :--- |
| Pace Project No.: | 60372053 |

Method: Total Radium Calculation
Description: Total Radium 228+226
Client: Evergy Kansas Central, Inc.
Date: July 06, 2021

## General Information:

5 samples were analyzed for Total Radium Calculation by Pace Analytical Services Greensburg. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

## Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

## ANALYTICAL RESULTS - RADIOCHEMISTRY

| Project: TEC 322 Landfill CCR <br> Pace Project No.: 60372053 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample: MW-1-060721 PWS: | Lab ID: 60372053001 Collected: 06/07/21 10:30 <br> Site ID: Sample Type: |  | Received: 06/08/21 10:15 |  | Matrix: Water |  |
| Parameters | Method | Act $\pm$ Unc (MDC) Carr Trac | Units | Analyzed | CAS No. | Qual |
| Pace Analytical Services - Greensburg |  |  |  |  |  |  |
| Radium-226 | EPA 903.1 | $\begin{aligned} & 0.000 \pm 0.268 \quad(0.545) \\ & \text { C:NA T:83\% } \end{aligned}$ | $\mathrm{pCi} / \mathrm{L}$ | 06/30/21 13:41 | 13982-63-3 |  |
|  | Pace Analyti | ces - Greensburg |  |  |  |  |
| Radium-228 | EPA 904.0 | $\begin{aligned} & 0.434 \pm 0.378 \quad \text { (0.758) } \\ & \mathrm{C}: 71 \% \mathrm{~T}: 81 \% \end{aligned}$ | $\mathrm{pCi} / \mathrm{L}$ | 06/28/21 14:24 | 15262-20-1 | 1 e |
|  | Pace Analyti | ces - Greensburg |  |  |  |  |
| Total Radium | Total Radium Calculation | $0.434 \pm 0.463$ (0.758) | $\mathrm{pCi} / \mathrm{L}$ | 07/02/21 14:56 | 7440-14-4 |  |

## ANALYTICAL RESULTS - RADIOCHEMISTRY

| Project: TEC 322 Landfill CCR <br> Pace Project No.: 60372053 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample: MW-4-060721 PWS: | Lab ID: 60372053002 Collected: 06/07/21 11:15 <br> Site ID: Sample Type: |  | Received: 06/08/21 10:15 |  | Matrix: Water |  |
| Parameters | Method | Act $\pm$ Unc (MDC) Carr Trac | Units | Analyzed | CAS No. | Qual |
| Pace Analytical Services - Greensburg |  |  |  |  |  |  |
| Radium-226 | EPA 903.1 | $\begin{aligned} & 0.656 \pm 0.590 \quad(0.896) \\ & \text { C:NA T:91\% } \end{aligned}$ | $\mathrm{pCi} / \mathrm{L}$ | 06/30/21 13:41 | 13982-63-3 |  |
|  | Pace Analyti | ces - Greensburg |  |  |  |  |
| Radium-228 | EPA 904.0 | $\begin{aligned} & 0.891 \pm 0.454 \quad \text { (0.794) } \\ & \text { C:71\% T:87\% } \end{aligned}$ | $\mathrm{pCi} / \mathrm{L}$ | 06/28/21 14:24 | 15262-20-1 | 1 e |
|  | Pace Analyti | ces - Greensburg |  |  |  |  |
| Total Radium | Total Radium Calculation | $1.55 \pm 0.744$ (0.896) | $\mathrm{pCi} / \mathrm{L}$ | 07/02/21 14:56 | 7440-14-4 |  |

## ANALYTICAL RESULTS - RADIOCHEMISTRY

| Project: TEC 322 Landfill CCR <br> Pace Project No.: 60372053 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |
| Sample: MW-5-060721 PWS: | Lab ID: 60372053003 Collected: 06/07/21 13:10 <br> Site ID: Sample Type: |  | Received: 06/08/21 10:15 |  | Matrix: Water | Qual |
| Parameters | Method | Act $\pm$ Unc (MDC) Carr Trac | Units | Analyzed | CAS No. |  |
| Radium-226 | Pace Analytical Services - Greensburg |  |  |  |  | 1 e |
|  | EPA 903.1 | $\begin{aligned} & 0.000 \pm 0.338 \quad(0.733) \\ & \text { C:NA T:84\% } \end{aligned}$ | $\mathrm{pCi} / \mathrm{L}$ | 06/30/21 13:53 | 13982-63-3 |  |
|  | Pace Analytical Services - Greensburg |  |  |  |  |  |
| Radium-228 | EPA 904.0 | $\begin{aligned} & 0.252 \pm 0.345 \\ & \mathrm{C}: 74 \% \mathrm{~T}: 91 \% \end{aligned}$ | $\mathrm{pCi} / \mathrm{L}$ | 06/28/21 14:24 | 15262-20-1 |  |
|  | Pace Analyti | ices - Greensburg |  |  |  |  |
| Total Radium | Total Radium Calculation | $0.252 \pm 0.483$ (0.738) | $\mathrm{pCi} / \mathrm{L}$ | 07/02/21 14:56 | 7440-14-4 |  |

## ANALYTICAL RESULTS - RADIOCHEMISTRY

| Project: TEC 322 Landfill CCR <br> Pace Project No.: 60372053 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |
| Sample: MW-6-060721 PWS: | Lab ID: 60372053004 Collected: 06/07/21 11:35 <br> Site ID: Sample Type: |  | Received | /08/21 10:15 | atrix: Water |  |
| Parameters | Method | Act $\pm$ Unc (MDC) Carr Trac | Units | Analyzed | CAS No. | Qual |
| Pace Analytical Services - Greensburg |  |  |  |  |  |  |
| Radium-226 | EPA 903.1 | $\begin{aligned} & -0.179 \pm 0.310 \quad(0.782) \\ & \text { C:NA T: } 94 \% \end{aligned}$ | $\mathrm{pCi} / \mathrm{L}$ | 06/30/21 13:53 | 13982-63-3 |  |
|  | Pace Analytical Services - Greensburg |  |  |  |  |  |
| Radium-228 | EPA 904.0 | $\begin{aligned} & 0.907 \pm 0.460 \quad(0.802) \\ & \mathrm{C}: 71 \% \mathrm{~T}: 84 \% \end{aligned}$ | $\mathrm{pCi} / \mathrm{L}$ | 06/28/21 14:24 | 15262-20-1 | 1 e |
|  | Pace Analyti | ices - Greensburg |  |  |  |  |
| Total Radium | Total Radium Calculation | $0.907 \pm 0.555$ (0.802) | $\mathrm{pCi} / \mathrm{L}$ | 07/02/21 14:56 | 7440-14-4 |  |

## ANALYTICAL RESULTS - RADIOCHEMISTRY



## QUALITY CONTROL - RADIOCHEMISTRY

| Project: | TEC 322 Landfill CCR |
| :--- | :--- |
| Pace Project No.: | 60372053 |


| QC Batch: | 452699 | Analysis Method: | EPA 904.0 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 904.0 | Analysis Description: | 904.0 Radium 228 |
|  |  |  | Laboratory: |

METHOD BLANK: 2185412 Matrix: Water

Associated Lab Samples: 60372053001, 60372053002, 60372053003, 60372053004, 60372053005

| Parameter | Act $\pm$ Unc (MDC) Carr Trac | Units | Analyzed | Qualifiers |
| :---: | :---: | :---: | :---: | :---: |
| Radium-228 | $0.440 \pm 0.357$ (0.714) C:76\% T:88\% | $\mathrm{pCi} / \mathrm{L}$ | 07/01/21 10:59 |  |
| Radium-228 | $1.42 \pm 0.515$ (0.758) C:71\% T:88\% | $\mathrm{pCi} / \mathrm{L}$ | 06/28/21 11:11 |  |

## REPORT OF LABORATORY ANALYSIS

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## QUALITY CONTROL - RADIOCHEMISTRY

| Project: | TEC 322 Landfill CCR |
| :--- | :--- |
| Pace Project No.: | 60372053 |


| QC Batch: | 452696 | Analysis Method: | EPA 903.1 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 903.1 | Analysis Description: | 903.1 Radium-226 |
|  |  |  | Laboratory: |

METHOD BLANK: 2185409
Associated Lab Samples: $\quad 60372053001,60372053002,60372053003,60372053004,60372053005$
$\frac{\text { Parameter }}{\text { Radium-226 }} \frac{\text { Act } \pm \text { Unc (MDC) Carr Trac }}{0.0999 \pm 0.367(0.704) \mathrm{C}: \mathrm{NA} \mathrm{T:87} \mathrm{\%}} \frac{\text { Units }}{\mathrm{pCi} / \mathrm{L}} \frac{\text { Analyzed }}{06 / 30 / 2113: 41} \frac{\text { Qualifiers }}{}$

## REPORT OF LABORATORY ANALYSIS

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## QUALIFIERS

| Project: | TEC 322 Landfill CCR |
| :--- | :--- |
| Pace Project No.: | 60372053 |

## DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.
ND - Not Detected at or above adjusted reporting limit.
TNTC - Too Numerous To Count
$J$ - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
MDL - Adjusted Method Detection Limit.
PQL - Practical Quantitation Limit.
RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

## S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.
Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate \% recovery and RPD values.
LCS(D) - Laboratory Control Sample (Duplicate)
MS(D) - Matrix Spike (Duplicate)
DUP - Sample Duplicate
RPD - Relative Percent Difference
NC - Not Calculable.
SG - Silica Gel - Clean-Up
U - Indicates the compound was analyzed for, but not detected.
N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.
Act - Activity
Unc - Uncertainty: SDWA = 1.96 sigma count uncertainty, all other matrices = Expanded Uncertainty ( $95 \%$ confidence interval). Gamma Spec = Expanded Uncertainty (95.4\% Confidence Interval)
(MDC) - Minimum Detectable Concentration

Trac - Tracer Recovery (\%)
Carr - Carrier Recovery (\%)
Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.
TNI - The NELAC Institute.

## ANALYTE QUALIFIERS

1e Analyte detected in Method Blank above reporting limit of $1.0 \mathrm{pCi} / \mathrm{L}$. Samples with activity results below their associated MDC or the client RDL are reportable without qualification.
$2 e \quad$ Analyte detected in Method Blank above reporting limit of $1.0 \mathrm{pCi} / \mathrm{L}$. Samples with activity results below their associated MDC or the client RDL are reportable without qualification.

Results for sample with activity greater than the client RDL may be qualified.
$3 e$

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: TEC 322 Landfill CCR

Pace Project No.: 60372053

| Lab ID | Sample ID | QC Batch Method | QC Batch | Analytical Method | Analytical Batch |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 60372053001 | MW-1-060721 | EPA 903.1 | 452696 |  |  |
| 60372053002 | MW-4-060721 | EPA 903.1 | 452696 |  |  |
| 60372053003 | MW-5-060721 | EPA 903.1 | 452696 |  |  |
| 60372053004 | MW-6-060721 | EPA 903.1 | 452696 |  |  |
| 60372053005 | DUP-382LF-060721 | EPA 903.1 | 452696 |  |  |
| 60372053001 | MW-1-060721 | EPA 904.0 | 452699 |  |  |
| 60372053002 | MW-4-060721 | EPA 904.0 | 452699 |  |  |
| 60372053003 | MW-5-060721 | EPA 904.0 | 452699 |  |  |
| 60372053004 | MW-6-060721 | EPA 904.0 | 452699 |  |  |
| 60372053005 | DUP-382LF-060721 | EPA 904.0 | 452699 |  |  |
| 60372053001 | MW-1-060721 | Total Radium Calculation | 455016 |  |  |
| 60372053002 | MW-4-060721 | Total Radium Calculation | 455016 |  |  |
| 60372053003 | MW-5-060721 | Total Radium Calculation | 455016 |  |  |
| 60372053004 | MW-6-060721 | Total Radium Calculation | 455016 |  |  |
| 60372053005 | DUP-382LF-060721 | Total Radium Calculation | 455016 |  |  |

CHAIN-OF-CUSTODY / Analytical Request Document
The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

-Important Note: By signing this form you are accepting Pace's NET 30 day payment terms and agreeing to late charges of $1.5 \%$ per month for any invoices not paid within 30 days.
F-ALL-Q-02Orev.08, 12-Oct-2007

Workorder: 60372053 Workorder Name: TEC 322 Landfill CCR Cert. Needed: $X$ Yes $\square$ No

${ }^{* * * / n}$ order to maintain client confidentiality, location/name of the sampling site, sampler's name and signature may not be provided on this COC document. This chain of custody is considered complete as is since this information is available in the owner laboratory.

Pittsburgh Lab Sample Condition Upon Receipt


| exceptions: VOA, coliform, TOC, O\&G, Phenolics, Radon, <br> Non-aqueous matrix <br> All containers meet method preservation <br> requirements. |
| :--- |

Client Notification/Resolution:
Person Contacted:



Quality Control Sample Performance Assessment
Analyst Must Manually Enter All Fields Highlighted in Yellow.

| Sample Matrix Spike Control Assessment | MS/MSD 1 | MS/MSD 2 |
| :---: | :---: | :---: |
| Sample Collection Date: | 6/8/2021 |  |
| Sample I.D. Sample MS I.D. | 30425198001 30425198001 MS |  |
| Sample MSD I.D. Spike I.D.: | 20-032 |  |
| MS/MSD Decay Corrected Spike Concentration ( $\mathrm{PCi} / \mathrm{mL}$ ): | 32.174 |  |
| Spike Volume Used in MS (mL): | 0.20 |  |
| Spike Volume Used in MSD (mL): |  |  |
| MS Aliquot ( $L, \mathrm{~g}, \mathrm{~F}$ ): | 0.658 |  |
| MS Target Conc. (pCi/L, g, F): | 9.783 |  |
| $\operatorname{MSD}$ Aliquot ( $\mathrm{L}, \mathrm{g}, \mathrm{F}$ ): MSD Target Conc. ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): MS Spike Uncertainty (calculated): MSD Spike Uncertainty (calculated): | 0.460 |  |
| Sample Result: | -0.095 |  |
| Sample Result Counting Uncertainty ( $\mathrm{PCi/L}, \mathrm{~g}, \mathrm{~F}$ : | 0.186 |  |
| Sample Matrix Spike Result: | 11.072 |  |
| Matrix Spike Result Counting Uncertainty ( $\mathrm{PC/L} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): | 1.613 |  |
| Sample Matrix Spike Duplicate Result: Matrix Spike Duplicate Result Counting Uncertainty (pCi/L, g, F): MS Numerical Performance Indicator: | 1.607 |  |
| MSD Numerical Performance Indicator: |  |  |
| MS Percent Recovery: | 114.14\% |  |
| MSD Percent Recovery: <br> MS Status vs Numerical Indicator: | N/A |  |
| MSD Status vs Numerical Indicator: |  |  |
| MS Status vs Recovery: | Pass |  |
| MSD Status vs Recovery: |  |  |
| MS/MSD Upper \% Recovery Limits: | 136\% |  |
| MS/MSD Lower \% Recovery Limits: | 71\% |  |


| Duplicate Sample Assessment |  |  |
| :---: | :---: | :---: |
| Sample I.D.: <br> Duplicate Sample I.D. <br> Sample Result ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): <br> Sample Result Counting Uncertainty ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): Sample Duplicate Result ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): <br> Sample Duplicate Result Counting Uncertainty ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): Are sample and/or duplicate results below RL? | 7374192021 7374192021 DUP -0.118 0.231 0.062 0.209 Se\# | Enter Duplicate sample iDs if other than LCS/LCSD in the space below. |
| Duplicate Numerical Performance Indicator: | -1.129 | 7374192021 |
| Duplicate RPD: | -638.16\% | 7374192021DUP |
| Duplicate Status vs Numerical Indicator: Duplicate Status vs RPD: \% RPD Limit | $\begin{aligned} & \text { N/A } \\ & \text { Pass } \\ & 32 \% \\ & \hline \end{aligned}$ |  |


\# Evaluation of duplicate precision is not applicable if either the sample or duplicate results are below the RL.
Comments:

Quality Control Sample Performance Assessment
FaceAnalytical"

| 1 mwepacselass comTest: <br> Analyst: <br> Date: <br> Worklist: <br> Matrix: | $\begin{gathered} \text { Ra-228 } \\ \text { VAL } \\ 6 / 23 / 2021 \\ 61206 \\ \text { WT } \end{gathered}$ |  |
| :---: | :---: | :---: |
| Method Blank Assessment MB Sample ID <br>  MB concentration: <br> MB 2 Sigma CSU:  <br> MB MDC:  <br>   <br> MB Numerical Performance Indicator:  <br> MB Status vs Numerical indicator:  <br> MB Status vs. MDC:  | $\begin{gathered} 2185412 \\ 1.420 \\ 0.515 \\ 0.758 \\ 5.41 \\ \text { Fail }^{*} \\ \text { Fail }^{*} \\ \hline \end{gathered}$ |  |
| Laboratory Control Sample Assessment <br> Count Date: Spike I.D.: <br> Decay Corrected Spike Concentration ( $\mathrm{pCi} / \mathrm{mL}$ ): <br> Volume Used (mL): <br> Aliquot Volume (L, g, F): Target Conc. ( $\mathrm{pCl} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): Uncertainty (Calculated): Resuit ( $\mathrm{pCl/L}, \mathrm{~g}, \mathrm{~F}$ ): <br> LCSACSD 2 Sigma CSU ( $\mathrm{pCl/L}, \mathrm{~g}, \mathrm{~F}$ ): Numerical Performance Indicator: <br> Percent Recovery: <br> Status vs Numerical indicator: <br> Status vs Recovery: Upper \% Recovery Limits: Lower \% Recovery Limits: | $L C S D(Y$ or N)? <br> LCS61206 <br> $6 / 26812021$ <br> $21-003$ <br> 37.148 <br> 0.10 <br> 0.825 <br> 4.502 <br> 0.221 <br> 3.868 <br> 0.941 <br> -1.29 <br> $85.91 \%$ <br> N/A <br> Pass <br> $135 \%$ <br> $60 \%$ | $\frac{\mathrm{N}}{\text { LCSD61206 }}$ |


| Sample Matrix Spike Control Assessment | MS/MSD 1 | MS/MSD 2 |
| :---: | :---: | :---: |
| Sample Collection Date: | 6/3/2021 |  |
| Sample I.D. Sample MS I.D. | $\begin{aligned} & 30425247001 \\ & 30425247001 \mathrm{MS} \end{aligned}$ |  |
| Sample MSD I.D. Spike I.D.: | 21-003 |  |
| MS/MSD Decay Corrected Spike Concentration ( $\mathrm{pCl} / \mathrm{mL}$ ) : | 37.457 |  |
| Spike Volume Used in MS (mL): | 0.20 |  |
| Spike Volume Used in MSD (mL): |  |  |
| MS Aliquot ( $\mathrm{L}, \mathrm{g}, \mathrm{F}$ ): | 0.794 |  |
| MS Target Conc. (pCiLL, $\mathrm{g}, \mathrm{F})$ : | 9.438 |  |
| MSD Aliquot ( $\mathrm{L}, \mathrm{g}, \mathrm{F}$ ): <br> MSD Target Conc. ( $\mathbf{p C i / L}, \mathrm{g}, \mathrm{F}$ ): |  |  |
| MS Spike Uncertainty (calculated): MSD Spike Uncertainty (calculated): | 0.462 |  |
| Sample Result: | 0.085 |  |
| Sample Result 2 Sigma CSU (pCi/L, $\mathrm{g}, \mathrm{F}$ ): | 0.309 |  |
| Sample Matrix Spike Result: | 8.030 |  |
| Matrix Spike Result 2 Sigma CSU ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): | 1.651 |  |
| Sample Matrix Spike Duplicate Result: Matrix Spike Duplicate Result 2 Sigma CSU (pCi/L, g, F): |  |  |
| MS Numerical Performance Indicator: | -1.680 |  |
| MSD Numerical Performance Indicator: |  |  |
| MS Percent Recovery: | 84.18\% |  |
| MSD Percent Recovery: |  |  |
| MS Status vs Numerical Indicator: | Pass |  |
| MSD Status vs Numerical Indicator: MS Status vs Recovery: | Pass |  |
| MSD Status vs Recovery: |  |  |
| MS/MSD Upper \% Recovery Limits: | 135\% |  |
| MS/MSD Lower \% Recovery Limits: | 60\% |  |


| Duplicate Sample Assessment |  |  |
| :---: | :---: | :---: |
| Sample I.D.: <br> Duplicate Sample I.D. <br> Sample Result (pCIL, g, F): <br> Sample Result 2 Sigma CSU (pCill, g, F): <br> Sample Duplicate Result ( $\mathrm{pCl} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ) <br> Sample Duplicate Result 2 Sigma CSU (pCI/L, g, F): <br> Are sample and/or duplicate results below RL? | 30425242001 30425242001 DUP 0.651 0.381 0.167 0.327 | Enter Duplicate sample IDs if other than LCS/LCSD in the space below. |
| Duplicate Numerical Performance Indicator: | 1.891 | 30425242001 |
| Duplicate RPD: | 118.34\% | 30425242001 DUP |
| Duplicate Status vs Numerical Indicator: | Pass |  |
| Duplicate Status vs RPD: <br> \% RPD Limit | $\begin{aligned} & \text { Failth* } \\ & 36 \% \end{aligned}$ |  |

$\left.\begin{array}{|r|r|r|}\hline \text { Matrix Spike/Matrix Spike Duplicate Sample Assessment } \\ \text { Sample I.D. } \\ \text { Sample MS I.D. } \\ \text { Sample MSD I.D. } \\ \text { Sample Matrix Spike Result: }\end{array}\right)$
\#\# Evaluation of duplicate precision is not applicable if either the sample or duplicate results are below the MDC

## Comments:

If the lowest activity sample in this batch is greater than ten times the blank value, the blank is acceptable; otherwise this batch must be re-prepped

# Quality Control Sample Performance Assessment 

| www.pacelabs.com <br> Test: <br> Analyst: <br> Date: <br> Worklist: <br> Matrix: | $\begin{gathered} \text { Ra-228 } \\ \text { VAL } \\ 6 / 29 / 2021 \\ 61206 \\ \text { WT } \end{gathered}$ |  |
| :---: | :---: | :---: |
| Method Blank Assessment MB Sample ID <br>  MB concentration: <br>  M/B 2 Sigma CSU: <br> MB MDC:  <br>  MB Numerical Performance Indicator: <br> MB Status vs Numerical Indicator:  <br> MB Status vs. MDC:  | $\begin{gathered} 2185412 \\ 0.440 \\ 0.357 \\ 0.714 \\ 2.41 \\ \text { Warning } \\ \text { Pass } \end{gathered}$ |  |
| Laboratory Control Sample Assessment | LCSD (Y or N$)$ ? | N |
|  | LCS61206 | LCSD61206 |
| Count Date: | \#N/A | \#N/A |
| Spike I.D.: | \#N/A | \#N/A |
| Decay Corrected Spike Concentration (pCi/mL): | \#N/A | \#N/A |
| Volume Used (mL): |  | \#N/A |
| Aliquot Volume ( $\mathrm{L}, \mathrm{g}, \mathrm{F}$ ): | \#N/A | \#N/A |
| Target Conc. ( $\mathrm{pCli} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): | \#N/A | \#N/A |
| Uncertainty (Calculated): | \#N/A | \#N/A |
| Result ( $\mathrm{PCi/L}, \mathrm{~g}, \mathrm{~F}$ ): | \#N/A | \#N/A |
| LCS/LCSD 2 Sigma CSU (pCill., g, F): | \#N/A |  |
| Numerical Performance Indicator: | \#N/A | \#N/A |
| Percent Recovery: | \#N/A | \#N/A |
| Status vs Numerical Indicator: | \#N/A | \#N/A |
| Status vs Recovery: | \#N/A | \#N/A |
| Upper \% Recovery Limits: | \#N/A | \#N/A |
| Lower \% Recovery Limits: | \#N/A | \#N/A |

Analyst Must Manually Enter All Fields Highlighted in Yellow.

| Sample Matrix Spike Control Assessment | MS/MSD 1 | MS/MSD 2 |
| :---: | :---: | :---: |
| Sample Collection Date: <br> Sample I.D. Sample MS I.D. Sample MSD I.D. Spike 1.D.: <br> MS/MSD Decay Corrected Spike Concentration ( $\mathrm{pCi} / \mathrm{mL}$ ): Spike Volume Used in MS (mL): Spike Volume Used in MSD ( mL ): MS Aliquot ( $\mathrm{L}, \mathrm{g}, \mathrm{F}$ ): MS Target Conc. $(\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F})$ : <br> MSD Aliquot ( $L, g, F$ ): MSD Target Conc. ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): MS Spike Uncertainty (calculated): MSD Spike Uncertainty (calculated): <br> Sample Result: <br> Sample Result 2 Sigma CSU (pCi/L, g, F): Sample Matrix Spike Resuit: <br> Matrix Spike Result 2 Sigma CSU (pCi/L, g, F): Sample Matrix Spike Duplicate Result: Matrix Spike Duplicate Result 2 Sigma CSU ( $\mathrm{pCl} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): MS Numerical Performance Indicator: MSD Numerical Performance Indicator: <br> MS Percent Recovery: MSD Percent Recovery: MS Status vs Numerical Indicator: MSD Status vs Numerical Indicator: MS Status vs Recovery: MSD Status vs Recovery: MS/MSD Upper \% Recovery Limits: MS/MSD Lower \% Recovery Limits: |  |  |


| Duplicate Sample Assessment |  |  |
| :---: | :---: | :---: |
| Sample I.D.: <br> Duplicate Sample I.D. <br> Sample Result ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): <br> Sample Result 2 Sigma CSU (pCi/L, g, F): Sample Duplicate Result ( $\mathrm{pCi/L}, \mathrm{~g}$, F ): <br> Sample Duplicate Result 2 Sigma CSU ( $\mathrm{pCi/L}, \mathrm{~g}, \mathrm{~F}$ ): Are sample and/or duplicate results below RL? | See Below \#\# | Enter Duplicate sample IDs if other than LCS/LCSD in the space below. |
|  |  |  |
| Duplicate Status vs Numerical Indicator: Duplicate Status vs RPD: \% RPD Limit: |  |  |


\#\# Evaluation of duplicate precision is not applicable if either the sample or duplicate results are below the MDC


#### Abstract

Comments: \#N/A




## ATTACHMENT 1-3

September 2021 Sampling Event Laboratory Analytical Report

October 29, 2021

Melissa Michels
Evergy, Inc.
818 Kansas Avenue
Topeka, KS 66612

```
RE: Project: TEC 322 LANDFILL CCR
Pace Project No.: 60380371
```

Dear Melissa Michels:
Enclosed are the analytical results for sample(s) received by the laboratory on September 14, 2021. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Kansas City
- Pace Analytical Services - Greensburg

If you have any questions concerning this report, please feel free to contact me.

Sincerely,


Hank Kapka
hank.kapka@pacelabs.com
(913)599-5665

PM Lab Management
Enclosures
cc: Laura Hines, Evergy, Inc.
Jake Humphrey, Evergy, Inc.
Samantha Kaney, Haley \& Aldrich
Jared Morrison, Evergy, Inc.
Danielle Oberbroeckling, Haley \& Aldrich
Melanie Satanek, Haley \& Aldrich, Inc.
JD Schlegel, Evergy, Inc.
Jacob Will, Evergy Kansas Central, Jeffrey Energy Center

REPORT OF LABORATORY ANALYSIS

## CERTIFICATIONS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |

Pace Analytical Services Pennsylvania
1638 Roseytown Rd Suites 2,3\&4, Greensburg, PA 15601
ANAB DOD-ELAP Rad Accreditation \#: L2417
Alabama Certification \#: 41590
Arizona Certification \#: AZ0734
Arkansas Certification
California Certification \#: 04222CA
Colorado Certification \#: PA01547
Connecticut Certification \#: PH-0694
Delaware Certification
EPA Region 4 DW Rad
Florida/TNI Certification \#: E87683
Georgia Certification \#: C040
Florida: Cert E871149 SEKS WET
Guam Certification
Hawaii Certification
Idaho Certification
Illinois Certification
Indiana Certification
Iowa Certification \#: 391
Kansas/TNI Certification \#: E-10358
Kentucky Certification \#: KY90133
KY WW Permit \#: KY0098221
KY WW Permit \#: KY0000221
Louisiana DHH/TNI Certification \#: LA180012
Louisiana DEQ/TNI Certification \#: 4086
Maine Certification \#: 2017020
Maryland Certification \#: 308
Massachusetts Certification \#: M-PA1457
Michigan/PADEP Certification \#: 9991

Missouri Certification \#: 235
Montana Certification \#: Cert0082
Nebraska Certification \#: NE-OS-29-14
Nevada Certification \#: PA014572018-1
New Hampshire/TNI Certification \#: 297617
New Jersey/TNI Certification \#: PA051
New Mexico Certification \#: PA01457
New York/TNI Certification \#: 10888
North Carolina Certification \#: 42706
North Dakota Certification \#: R-190
Ohio EPA Rad Approval: \#41249
Oregon/TNI Certification \#: PA200002-010
Pennsylvania/TNI Certification \#: 65-00282
Puerto Rico Certification \#: PA01457
Rhode Island Certification \#: 65-00282
South Dakota Certification
Tennessee Certification \#: 02867
Texas/TNI Certification \#: T104704188-17-3
Utah/TNI Certification \#: PA014572017-9
USDA Soil Permit \#: P330-17-00091
Vermont Dept. of Health: ID\# VT-0282
Virgin Island/PADEP Certification
Virginia/VELAP Certification \#: 9526
Washington Certification \#: C868
West Virginia DEP Certification \#: 143
West Virginia DHHR Certification \#: 9964C
Wisconsin Approve List for Rad
Wyoming Certification \#: 8TMS-L

## Pace Analytical Services Kansas

9608 Loiret Boulevard, Lenexa, KS 66219
Missouri Inorganic Drinking Water Certification \#: 10090
Arkansas Drinking Water
Arkansas Certification \#: 20-020-0
Arkansas Drinking Water
Illinois Certification \#: 2000302021-3
Iowa Certification \#: 118
Kansas/NELAP Certification \#: E-10116
Louisiana Certification \#: 03055

Nevada Certification \#: KS000212020-2
Oklahoma Certification \#: 9205/9935
Florida: Cert E871149 SEKS WET
Texas Certification \#: T104704407-19-12
Utah Certification \#: KS000212019-9
Illinois Certification \#: 004592
Kansas Field Laboratory Accreditation: \# E-92587
Missouri SEKS Micro Certification: 10070

## SAMPLE SUMMARY

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |


| Lab ID | Sample ID | Matrix | Date Collected | Date Received |
| :---: | :---: | :---: | :---: | :---: |
| 60380371001 | MW-1-091321 | Water | 09/13/21 14:45 | 09/14/21 16:30 |
| 60380371002 | MW-4-091321 | Water | 09/13/21 12:25 | 09/14/21 16:30 |
| 60380371003 | MW-5-091321 | Water | 09/13/21 16:05 | 09/14/21 16:30 |
| 60380371004 | MW-6-091321 | Water | 09/13/21 14:35 | 09/14/21 16:30 |
| 60380371005 | TEC-322LF-DUP-091321 | Water | 09/13/21 16:15 | 09/14/21 16:30 |

## SAMPLE ANALYTE COUNT

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |


| Lab ID | Sample ID | Method | Analysts | Analytes Reported | Laboratory |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 60380371001 | MW-1-091321 | EPA 200.7 | JLH | 3 | PASI-K |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | EPA 245.1 | VRB | 1 | PASI-K |
|  |  | EPA 903.1 | SLC | 1 | PASI-PA |
|  |  | EPA 904.0 | JC2 | 1 | PASI-PA |
|  |  | Total Radium Calculation | JAL | 1 | PASI-PA |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | KB | 1 | PASI-K |
|  |  | EPA 300.0 | LDB | 3 | PASI-K |
| 60380371002 | MW-4-091321 | EPA 200.7 | JLH | 3 | PASI-K |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | EPA 245.1 | VRB | 1 | PASI-K |
|  |  | EPA 903.1 | SLC | 1 | PASI-PA |
|  |  | EPA 904.0 | JC2 | 1 | PASI-PA |
|  |  | Total Radium Calculation | JAL | 1 | PASI-PA |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | KB | 1 | PASI-K |
|  |  | EPA 300.0 | LDB | 3 | PASI-K |
| 60380371003 | MW-5-091321 | EPA 200.7 | JLH | 3 | PASI-K |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | EPA 245.1 | VRB | 1 | PASI-K |
|  |  | EPA 903.1 | SLC | 1 | PASI-PA |
|  |  | EPA 904.0 | JC2 | 1 | PASI-PA |
|  |  | Total Radium Calculation | JAL | 1 | PASI-PA |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | KB | 1 | PASI-K |
|  |  | EPA 300.0 | LDB | 3 | PASI-K |
| 60380371004 | MW-6-091321 | EPA 200.7 | JLH | 3 | PASI-K |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | EPA 245.1 | VRB | 1 | PASI-K |
|  |  | EPA 903.1 | SLC | 1 | PASI-PA |
|  |  | EPA 904.0 | JC2 | 1 | PASI-PA |
|  |  | Total Radium Calculation | JAL | 1 | PASI-PA |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | KB | 1 | PASI-K |
|  |  | EPA 300.0 | LDB | 3 | PASI-K |
| 60380371005 | TEC-322LF-DUP-091321 | EPA 200.7 | JLH | 3 | PASI-K |

## SAMPLE ANALYTE COUNT

Project: $\quad$ TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| Lab ID | Sample ID | Method | Analysts | Analytes <br> Reported | Laboratory |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | EPA 200.8 | JGP | 2 | PASI-K |
|  |  | EPA 245.1 | VRB | 1 | PASI-K |
|  |  | EPA 903.1 | SLC | 1 | PASI-PA |
|  |  | EPA 904.0 | JC2 | 1 | PASI-PA |
|  |  | Total Radium Calculation | JAL | 1 | PASI-PA |
|  |  | SM 2540C | LDB | 1 | PASI-K |
|  |  | SM 4500-H+B | KB | 1 | PASI-K |
|  |  | EPA 300.0 | LDB | 3 | PASI-K |

PASI-K = Pace Analytical Services - Kansas City
PASI-PA = Pace Analytical Services - Greensburg

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371
Method: EPA 200.7
Description: 200.7 Metals, Total
Client: Evergy Kansas Central, Inc.
Date: October 29, 2021

## General Information:

5 samples were analyzed for EPA 200.7 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Sample Preparation:

The samples were prepared in accordance with EPA 200.7 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

## Continuing Calibration:

All criteria were within method requirements with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.
QC Batch: 744239
A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60380371001
M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2981921)
- Calcium


## Additional Comments:

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371
Method: EPA 200.8
Description: 200.8 MET ICPMS
Client: Evergy Kansas Central, Inc.
Date: October 29, 2021

## General Information:

5 samples were analyzed for EPA 200.8 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Sample Preparation:

The samples were prepared in accordance with EPA 200.8 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371
Method: EPA 245.1
Description: 245.1 Mercury
Client: Evergy Kansas Central, Inc.
Date: October 29, 2021

## General Information:

5 samples were analyzed for EPA 245.1 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Sample Preparation:

The samples were prepared in accordance with EPA 245.1 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371
Method: EPA 903.1
Description: 903.1 Radium 226
Client: Evergy Kansas Central, Inc.
Date: October 29, 2021

## General Information:

5 samples were analyzed for EPA 903.1 by Pace Analytical Services Greensburg. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371
Method: EPA 904.0
Description: 904.0 Radium 228
Client: Evergy Kansas Central, Inc.
Date: October 29, 2021

## General Information:

5 samples were analyzed for EPA 904.0 by Pace Analytical Services Greensburg. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371
Method: Total Radium Calculation
Description: Total Radium 228+226
Client: Evergy Kansas Central, Inc.
Date: October 29, 2021

## General Information:

5 samples were analyzed for Total Radium Calculation by Pace Analytical Services Greensburg. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

## PROJECT NARRATIVE

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371
Method: SM 2540C
Description: 2540C Total Dissolved Solids
Client: Evergy Kansas Central, Inc.
Date: October 29, 2021

## General Information:

5 samples were analyzed for SM 2540C by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:
All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

## PROJECT NARRATIVE

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |


| Method: | SM 4500-H+B |
| :--- | :--- |
| Description: | $4500 \mathrm{H}+\mathrm{pH}$, Electrometric |
| Client: | Evergy Kansas Central, Inc. |
| Date: | October 29, 2021 |

## General Information:

5 samples were analyzed for SM $4500-\mathrm{H}+\mathrm{B}$ by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.
H6: Analysis initiated outside of the 15 minute EPA required holding time.

- MW-1-091321 (Lab ID: 60380371001)
- MW-4-091321 (Lab ID: 60380371002)
- MW-5-091321 (Lab ID: 60380371003)
- MW-6-091321 (Lab ID: 60380371004)
-TEC-322LF-DUP-091321 (Lab ID: 60380371005)


## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

## Duplicate Sample:

All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

## REPORT OF LABORATORY ANALYSIS

## PROJECT NARRATIVE

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |

Method: EPA 300.0
Description: 300.0 IC Anions 28 Days
Client: Evergy Kansas Central, Inc.
Date: October 29, 2021

## General Information:

5 samples were analyzed for EPA 300.0 by Pace Analytical Services Kansas City. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

## Hold Time:

The samples were analyzed within the method required hold times with any exceptions noted below.

## Method Blank:

All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

## Laboratory Control Spike:

All laboratory control spike compounds were within QC limits with any exceptions noted below.

## Matrix Spikes:

All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.
QC Batch: 743926
A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60380071001,60380191002
M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2980224)
- Chloride


## Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |


| Sample: MW-1-091321 | Lab ID: 60380371001 |  | Collected: 09/13/21 14:45 |  | Received: 09/14/21 16:30 |  | Matrix: Water |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
| Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.062 | mg/L | 0.0050 | 1 | 09/20/21 11:52 | 09/22/21 20:35 | 7440-39-3 |  |
| Boron, Total Recoverable | <0.10 | $\mathrm{mg} / \mathrm{L}$ | 0.10 | 1 | 09/20/21 11:52 | 09/22/21 20:35 | 7440-42-8 |  |
| Calcium, Total Recoverable | 154 | mg/L | 0.20 | 1 | 09/20/21 11:52 | 09/22/21 20:35 | 7440-70-2 | M1 |

Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City

| $<0.0020$ | $\mathrm{mg} / \mathrm{L}$ | 0.0020 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $14: 52$ | $7440-38-2$ |
| ---: | :--- | ---: | :--- | :--- | :--- | :--- | :--- | :--- |
| $\mathbf{0 . 0 0 3 2}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0020 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $14: 52$ | $7440-48-4$ |

Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City


2540C Total Dissolved Solids $\quad$| Analytical Method: SM 2540C |  |
| :--- | :--- |
|  | Pace Analytical Services - Kansas City |

Total Dissolved Solids
mg/L
13.31

09/17/21 10:58
$4500 \mathrm{H}+\mathrm{pH}$, Electrometric
pH at 25 Degrees C
300.0 IC Anions 28 Days

Chloride
Fluoride
<0.20
Sulfate
353
mg/L
$\mathrm{mg} / \mathrm{L} \quad 0.20 \quad 1$
$\begin{array}{lll}\mathrm{mg} / \mathrm{L} & 20.0 \quad 20\end{array}$

| $09 / 17 / 21$ | $10: 40$ | $16887-00-6$ |
| :--- | :--- | :--- |
| $09 / 17 / 21$ | $10: 28$ | $16984-48-8$ |
| $09 / 17 / 21$ | $10: 40$ | $14808-79-8$ |

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |


| Sample: MW-4-091321 | Lab ID: 60380371002 |  | Collected: 09/13/21 12:25 |  | Received: 09/14/21 16:30 |  | atrix: Water |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
|  | Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.10 | $\mathrm{mg} / \mathrm{L}$ | 0.0050 | 1 | 09/20/21 11:52 | 09/22/21 20:42 | 7440-39-3 |  |
| Boron, Total Recoverable | <0.10 | $\mathrm{mg} / \mathrm{L}$ | 0.10 | 1 | 09/20/21 11:52 | 09/22/21 20:42 | 7440-42-8 |  |
| Calcium, Total Recoverable | 156 | mg/L | 0.20 | 1 | 09/20/21 11:52 | 09/22/21 20:42 | 7440-70-2 |  |

Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $14: 57$ | $7440-38-2$ |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $<\mathbf{0 . 0 0 1 0}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $14: 57$ | $7440-48-4$ |

Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City


2540C Total Dissolved Solids $\quad$| Analytical Method: SM 2540C |  |
| :--- | :--- |
|  | Pace Analytical Services - Kansas City |

Total Dissolved Solids
$1060 \mathrm{mg} / \mathrm{L} \quad 13.3 \quad 1 \quad 09 / 17 / 21$ 10:58
$4500 \mathrm{H}+\mathrm{pH}$, Electrometric

Analytical Method: SM 4500-H+B
Pace Analytical Services - Kansas City

| 7.2 | Std. Units | 0.10 | 1 | 09/17/21 11:04 |
| :--- | :--- | :--- | :--- | :--- | :--- |

Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City

Chloride
Fluoride
Sulfate

232
0.25

157

| $\mathrm{mg} / \mathrm{L}$ | 20.0 | 20 |
| :---: | :---: | :---: |
| $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 |
| $\mathrm{mg} / \mathrm{L}$ | 20.0 | 20 |


| $09 / 17 / 21$ | $11: 04$ |
| :--- | :--- |
| $16887-00-6$ |  |
| $09 / 17 / 21$ | $10: 52$ |
| $16984-48-8$ |  |
| $09 / 17 / 21$ | $11: 04$ |
| $14808-79-8$ |  |

## REPORT OF LABORATORY ANALYSIS

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |


| Sample: MW-5-091321 | Lab ID: 60380371003 |  | Collected: 09/13/21 16:05 |  | Received: 09/14/21 16:30 |  | atrix: Water |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
| Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.026 | mg/L | 0.0050 | 1 | 09/20/21 11:52 | 09/22/21 20:45 | 7440-39-3 |  |
| Boron, Total Recoverable | 0.64 | $\mathrm{mg} / \mathrm{L}$ | 0.10 | 1 | 09/20/21 11:52 | 09/22/21 20:45 | 7440-42-8 |  |
| Calcium, Total Recoverable | 240 | mg/L | 0.20 | 1 | 09/20/21 11:52 | 09/22/21 20:45 | 7440-70-2 |  |

Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $15: 18$ | $7440-38-2$ |
| ---: | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $\mathbf{0 . 0 0 1 9}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $15: 18$ | $7440-48-4$ |

Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City

2540C Total Dissolved Solids $\quad$| Analytical Method: SM 2540C |  |
| :--- | :--- |
|  | Pace Analytical Services - Kansas City |


Total Dissolved Solids

1490
mg/L
Analytical Method: SM 4500-H+B
Pace Analytical Services - Kansas City

| 7.4 | Std. Units | 0.10 | 1 | 09/20/21 11:32 |
| :--- | :--- | :--- | :--- | :--- | :--- |

Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City

## Chloride

Fluoride
Sulfate

| 44.1 | $\mathrm{mg} / \mathrm{L}$ | 20.0 | 20 | $09 / 17 / 21$ | $11: 51$ | $16887-00-6$ |
| :--- | :--- | :---: | :---: | :--- | :--- | :--- |
| 0.39 | $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 | $09 / 17 / 21$ | $11: 15$ | $16984-48-8$ |
| 784 | $\mathrm{mg} / \mathrm{L}$ | 100 | 100 | $09 / 18 / 21$ | $12: 46$ | $14808-79-8$ |

784
mg/L
$\mathrm{mg} / \mathrm{L}$

09/18/21 12:46 14808-79-8
20.0

1
09/17/21 10:58
$4500 \mathrm{H}+\mathrm{pH}$, Electrometric
pH at 25 Degrees C
300.0 IC Anions 28 Days
7.4 Std Units $\quad 0.10$
$\begin{array}{llllllll}<0.00020 & \mathrm{mg} / \mathrm{L} & 0.00020 & 1 & 09 / 16 / 21 & 16: 23 & 09 / 20 / 21 & 10: 26\end{array}$ 7439-97-6
Analytical Method: SM 2540C
Pace Analytical Services - Kansas City

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |


| Sample: MW-6-091321 | Lab ID: 60380371004 |  | Collected: 09/13/21 14:35 |  | Received: 09/14/21 16:30 |  | atrix: Water |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
|  | Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.017 | mg/L | 0.0050 | 1 | 09/20/21 11:52 | 09/22/21 20:47 | 7440-39-3 |  |
| Boron, Total Recoverable | 0.62 | $\mathrm{mg} / \mathrm{L}$ | 0.10 | 1 | 09/20/21 11:52 | 09/22/21 20:47 | 7440-42-8 |  |
| Calcium, Total Recoverable | 292 | mg/L | 0.20 | 1 | 09/20/21 11:52 | 09/22/21 20:47 | 7440-70-2 |  |

Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $15: 24$ | $7440-38-2$ |
| ---: | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $\mathbf{0 . 0 0 2 9}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $15: 24$ | $7440-48-4$ |

Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City


2540C Total Dissolved Solids $\quad$| Analytical Method: SM 2540C |  |
| :--- | :--- |
|  | Pace Analytical Services - Kansas City |

Total Dissolved Solids
1590 mg/L $20.0 \quad 1 \quad 09 / 17 / 21$ 10:58
$4500 \mathrm{H}+\mathrm{pH}$, Electrometric
pH at 25 Degrees C
300.0 IC Anions 28 Days
Chloride

Fluoride
Sulfate
0.5

932

SM 4500-H+B
Pace Analytical Services - Kansas City
7.0 Std Units 0.10

09/17/21 11:05
H6
Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City

## ANALYTICAL RESULTS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |


| Sample: TEC-322LF-DUP-091321 <br> Parameters | Lab ID: 60380371005 |  | Collected: 09/13/21 16:15 |  | Received: 09/14/21 16:30 |  | Matrix: Water |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
| 200.7 Metals, Total | Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 |  |  |  |  |  |  |  |
| Pace Analytical Services - Kansas City |  |  |  |  |  |  |  |  |
| Barium, Total Recoverable | 0.024 | mg/L | 0.0050 | 1 | 09/20/21 11:52 | 09/22/21 20:50 | 7440-39-3 |  |
| Boron, Total Recoverable | 0.61 | $\mathrm{mg} / \mathrm{L}$ | 0.10 | 1 | 09/20/21 11:52 | 09/22/21 20:50 | 7440-42-8 |  |
| Calcium, Total Recoverable | 232 | mg/L | 0.20 | 1 | 09/20/21 11:52 | 09/22/21 20:50 | 7440-70-2 |  |

Analytical Method: EPA 200.8 Preparation Method: EPA 200.8
Pace Analytical Services - Kansas City

| $<0.0010$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $15: 29$ | $7440-38-2$ |
| ---: | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $\mathbf{0 . 0 0 1 9}$ | $\mathrm{mg} / \mathrm{L}$ | 0.0010 | 1 | $09 / 20 / 21$ | $17: 15$ | $09 / 22 / 21$ | $15: 29$ | $7440-48-4$ |

Analytical Method: EPA 245.1 Preparation Method: EPA 245.1
Pace Analytical Services - Kansas City


2540C Total Dissolved Solids $\quad$| Analytical Method: SM 2540C |  |
| :--- | :--- |
|  | Pace Analytical Services - Kansas City |

Total Dissolved Solids
$1410 \mathrm{mg} / \mathrm{L} \quad 13.3 \quad 1 \quad 09 / 17 / 21$ 10:59
$4500 \mathrm{H}+\mathrm{pH}$, Electrometric

Analytical Method: SM 4500-H+B
Pace Analytical Services - Kansas City
6.8 Std Units 0.10

Analytical Method: EPA 300.0
Pace Analytical Services - Kansas City

## Chloride

Fluoride
Sulfate

| 44.9 | $\mathrm{mg} / \mathrm{L}$ | 20.0 | 20 | $09 / 17 / 21$ | $12: 38$ | $16887-00-6$ |
| :--- | :--- | :---: | :---: | :--- | :--- | :--- |
| $\mathbf{0 . 3 9}$ | $\mathrm{mg} / \mathrm{L}$ | 0.20 | 1 | $09 / 17 / 21$ | $12: 27$ | $16984-48-8$ |
| 676 | $\mathrm{mg} / \mathrm{L}$ | 100 | 100 | $09 / 18 / 21$ | $13: 23$ | $14808-79-8$ |

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| QC Batch: | 743893 | Analysis Method: | EPA 245.1 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 245.1 | Analysis Description: | 245.1 Mercury |
|  |  |  | Laboratory: |



| LABORATORY CONTROL SAMPLE: 2980143 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Mercury | mg/L | 0.005 | 0.0046 | 93 | 85-115 |  |



## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| QC Batch: | 744239 | Analysis Method: | EPA 200.7 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 200.7 | Analysis Description: | 200.7 Metals, Total |
|  |  | Laboratory: | Pace Analytical Services - Kansas City |
| Associated Lab Samples: | $60380371001,60380371002,60380371003,60380371004,60380371005$ |  |  |



| LABORATORY CONTROL SAMPLE: 2981920 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Barium | mg/L | 1 | 0.90 | 90 | 85-115 |  |
| Boron | $\mathrm{mg} / \mathrm{L}$ | 1 | 0.86 | 86 | 85-115 |  |
| Calcium | $\mathrm{mg} / \mathrm{L}$ | 10 | 9.2 | 92 | 85-115 |  |



## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| QC Batch: | 744247 | Analysis Method: | EPA 200.8 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 200.8 | Analysis Description: | 200.8 MET |
|  |  |  | Laboratory: |



| LABORATORY CONTROL SAMPLE: 2981933 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Arsenic | mg/L | 0.04 | 0.041 | 103 | 85-115 |  |
| Cobalt | $\mathrm{mg} / \mathrm{L}$ | 0.04 | 0.039 | 98 | 85-115 |  |


| MATRIX SPIKE \& MATRIX SPIKE DUPLICATE: 2981934 |  |  |  |  | 2981935 |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | MS | MSD |  | MSD | MS | MSD | \% Rec | Max |  |  |
|  |  | 60380371002 | Spike | Spike |  |  |  |  |  |  |  |  |
| Parameter | Units | Result | Conc. | Conc. | Result | Result | \% Rec | \% Rec | Limits | RPD | RPD | Qual |
| Arsenic | mg/L | <0.0010 | 0.04 | 0.04 | 0.042 | 0.042 | 104 | 105 | 70-130 | 1 | 20 |  |
| Cobalt | $\mathrm{mg} / \mathrm{L}$ | <0.0010 | 0.04 | 0.04 | 0.038 | 0.038 | 95 | 95 | 70-130 | 1 | 20 |  |

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| QC Batch: | 743948 | Analysis Method: | SM 2540C |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | SM 2540C | Analysis Description: | 2540C Total Dissolved Solids |
|  |  | Laboratory: | Pace Analytical Services - Kansas City |
| Associated Lab Samples: | $60380371001,60380371002,60380371003,60380371004,60380371005$ |  |  |


| METHOD BLANK: 2980283 |  | Matrix: Water |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Associated Lab Samples: | 60380371001, 60380371002, 60380371003, 60380371004, 60380371005 |  |  |  |  |
|  |  | Blank | Reporting |  |  |
| Parameter | Units | Result | Limit | Analyzed | Qualifiers |
| Total Dissolved Solids | mg/L | <5.0 | 5 | /17/21 10:57 |  |


| LABORATORY CONTROL SAMPLE: | 2980284 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameter |  |


| SAMPLE DUPLICATE: 2980285 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Parameter |

## SAMPLE DUPLICATE: 2980286

|  |  | 60380371004 | Dup |  | Max |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Parameter | Units | Result | Result | RPD | RPD | Qualifiers |
| Total Dissolved Solids | $\mathrm{mg} / \mathrm{L}$ | 1590 |  |  |  |  |

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| QC Batch: | 744237 | Analysis Method: | SM 4500-H+B |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | SM 4500-H+B | Analysis Description: | $4500 \mathrm{H}+\mathrm{B} \mathrm{pH}$ <br> Laboratory: |
| Associated Lab Samples: 60380371003 |  |  |  |


| SAMPLE DUPLICATE: 2981913 |
| :--- | :--- | :--- | :--- | :--- | :--- |
| Parameter |

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| QC Batch: | 743926 | Analysis Method: | EPA 300.0 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 300.0 | Analysis Description: | 300.0 IC Anions |
|  |  |  | Laboratory: |





| LABORATORY CONTROL SAMPLE: 2981688 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Spike | LCS | LCS | \% Rec |  |
| Parameter | Units | Conc. | Result | \% Rec | Limits | Qualifiers |
| Chloride | mg/L | 5 | 5.2 | 104 | 90-110 |  |
| Fluoride | $\mathrm{mg} / \mathrm{L}$ | 2.5 | 2.6 | 103 | 90-110 |  |
| Sulfate | $\mathrm{mg} / \mathrm{L}$ | 5 | 5.3 | 106 | 90-110 |  |



Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| MATRIX SPIKE SAMPLE: | 2980224 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 60380191002 | Spike | MS | MS | \% Rec |  |
| Parameter | Units |  |  |  |  |  | Qualifiers |
| Chloride | mg/L | ND | 500 | 484 | 78 | 80-120 | M1 |
| Fluoride | $\mathrm{mg} / \mathrm{L}$ | ND | 250 | 218 | 87 | 80-120 |  |
| Sulfate | $\mathrm{mg} / \mathrm{L}$ | 1200 | 500 | 1680 | 96 | 80-120 |  |

## REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,

## ANALYTICAL RESULTS - RADIOCHEMISTRY



## ANALYTICAL RESULTS - RADIOCHEMISTRY



## ANALYTICAL RESULTS - RADIOCHEMISTRY



## ANALYTICAL RESULTS - RADIOCHEMISTRY



## ANALYTICAL RESULTS - RADIOCHEMISTRY

| Project: <br> TEC 322 LANDFILL CCR |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample: TEC-322LF-DUP-091321 PWS: | Lab ID: 603 Site ID: | $\begin{array}{ll} & \text { Collected: 09/13/21 16: } \\ & \text { Sample Type: }\end{array}$ | Received | /14/21 16:30 | atrix: Water |  |
| Parameters | Method | Act $\pm$ Unc (MDC) Carr Trac | Units | Analyzed | CAS No. | Qual |
| Pace Analytical Services - Greensburg |  |  |  |  |  |  |
| Radium-226 | EPA 903.1 | $\begin{aligned} & 0.000 \pm 0.440 \quad(0.931) \\ & \text { C:NA T:95\% } \end{aligned}$ | $\mathrm{pCi} / \mathrm{L}$ | 09/28/21 17:38 | 13982-63-3 |  |
| Pace Analytical Services - Greensburg |  |  |  |  |  |  |
| Radium-228 | EPA 904.0 | $\begin{aligned} & 1.15 \pm 0.563 \\ & \text { C:76\% T:77\% } \end{aligned}$ | pCi/L | 09/27/21 11:16 | 15262-20-1 |  |
| Pace Analytical Services - Greensburg |  |  |  |  |  |  |
| Total Radium | Total Radium Calculation | $1.15 \pm 1.00$ (1.94) | $\mathrm{pCi} / \mathrm{L}$ | 10/07/21 15:41 | 7440-14-4 |  |

# QUALITY CONTROL - RADIOCHEMISTRY 

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| QC Batch: | 465101 | Analysis Method: | EPA 904.0 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 904.0 | Analysis Description: | 904.0 Radium 228 |
|  |  | Laboratory: | Pace Analytical Services - Greensburg |
| Associated Lab Samples: | $60380371001,60380371002,60380371003,60380371004,60380371005$ |  |  |


| METHOD BLANK: 2245932 |
| :--- |
| Associated Lab Samples: $\quad 60380371001,60380371002,60380371003,60380371004,60380371005$ |

$\frac{\text { Parameter }}{\text { Radium-228 }} \frac{\text { Act } \pm \text { Unc (MDC) Carr Trac }}{0.674 \pm 0.351 \quad(0.604) \mathrm{C}: 77 \% \mathrm{~T}: 84 \%} \frac{\text { Units }}{\mathrm{pCi} / \mathrm{L}} \frac{\text { Analyzed }}{09 / 27 / 2111: 12}-\frac{\text { Qualifiers }}{}$

## REPORT OF LABORATORY ANALYSIS

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# QUALITY CONTROL - RADIOCHEMISTRY 

Project: TEC 322 LANDFILL CCR

Pace Project No.: 60380371

| QC Batch: | 465100 | Analysis Method: | EPA 903.1 |
| :--- | :--- | :--- | :--- |
| QC Batch Method: | EPA 903.1 | Analysis Description: | 903.1 Radium-226 |
|  |  | Laboratory: | Pace Analytical Services - Greensburg |
| Associated Lab Samples: | $60380371001,60380371002,60380371003,60380371004,60380371005$ |  |  |


| METHOD BLANK: 2245931 | Matrix: Water |
| :--- | :---: | :---: |
| Associated Lab Samples: $60380371001,60380371002,60380371003,60380371004,60380371005$ |  |

$\frac{\text { Parameter }}{\text { Radium-226 }} \frac{\text { Act } \pm \text { Unc (MDC) Carr Trac }}{-0.107 \pm 0.257(0.642) \mathrm{C}: \mathrm{NA} \mathrm{T:94} \mathrm{\%}} \frac{\text { Units }}{\mathrm{pCi} / \mathrm{L}} \frac{\text { Analyzed }}{09 / 28 / 2117: 38} \frac{\text { Qualifiers }}{}$

## REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,

## QUALIFIERS

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |

## DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.
ND - Not Detected at or above adjusted reporting limit.
TNTC - Too Numerous To Count
$J$ - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
MDL - Adjusted Method Detection Limit.
PQL - Practical Quantitation Limit.
RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.
S - Surrogate
1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.
Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate \% recovery and RPD values.
LCS(D) - Laboratory Control Sample (Duplicate)
MS(D) - Matrix Spike (Duplicate)
DUP - Sample Duplicate
RPD - Relative Percent Difference
NC - Not Calculable.
SG - Silica Gel - Clean-Up
U - Indicates the compound was analyzed for, but not detected.
N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.
Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.
Act - Activity
Unc - Uncertainty: SDWA = 1.96 sigma count uncertainty, all other matrices = Expanded Uncertainty (95\% confidence interval). Gamma Spec = Expanded Uncertainty (95.4\% Confidence Interval)
(MDC) - Minimum Detectable Concentration

Trac - Tracer Recovery (\%)
Carr - Carrier Recovery (\%)
Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.
TNI - The NELAC Institute.

## ANALYTE QUALIFIERS

H6 Analysis initiated outside of the 15 minute EPA required holding time.
M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project:
TEC 322 LANDFILL CCR
Pace Project No.: 60380371

| Lab ID | Sample ID | QC Batch Method | QC Batch | Analytical Method | Analytical Batch |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 60380371001 | MW-1-091321 | EPA 200.7 | 744239 | EPA 200.7 | 744443 |
| 60380371002 | MW-4-091321 | EPA 200.7 | 744239 | EPA 200.7 | 744443 |
| 60380371003 | MW-5-091321 | EPA 200.7 | 744239 | EPA 200.7 | 744443 |
| 60380371004 | MW-6-091321 | EPA 200.7 | 744239 | EPA 200.7 | 744443 |
| 60380371005 | TEC-322LF-DUP-091321 | EPA 200.7 | 744239 | EPA 200.7 | 744443 |
| 60380371001 | MW-1-091321 | EPA 200.8 | 744247 | EPA 200.8 | 744527 |
| 60380371002 | MW-4-091321 | EPA 200.8 | 744247 | EPA 200.8 | 744527 |
| 60380371003 | MW-5-091321 | EPA 200.8 | 744247 | EPA 200.8 | 744527 |
| 60380371004 | MW-6-091321 | EPA 200.8 | 744247 | EPA 200.8 | 744527 |
| 60380371005 | TEC-322LF-DUP-091321 | EPA 200.8 | 744247 | EPA 200.8 | 744527 |
| 60380371001 | MW-1-091321 | EPA 245.1 | 743893 | EPA 245.1 | 744035 |
| 60380371002 | MW-4-091321 | EPA 245.1 | 743893 | EPA 245.1 | 744035 |
| 60380371003 | MW-5-091321 | EPA 245.1 | 743893 | EPA 245.1 | 744035 |
| 60380371004 | MW-6-091321 | EPA 245.1 | 743893 | EPA 245.1 | 744035 |
| 60380371005 | TEC-322LF-DUP-091321 | EPA 245.1 | 743893 | EPA 245.1 | 744035 |
| 60380371001 | MW-1-091321 | EPA 903.1 | 465100 |  |  |
| 60380371002 | MW-4-091321 | EPA 903.1 | 465100 |  |  |
| 60380371003 | MW-5-091321 | EPA 903.1 | 465100 |  |  |
| 60380371004 | MW-6-091321 | EPA 903.1 | 465100 |  |  |
| 60380371005 | TEC-322LF-DUP-091321 | EPA 903.1 | 465100 |  |  |
| 60380371001 | MW-1-091321 | EPA 904.0 | 465101 |  |  |
| 60380371002 | MW-4-091321 | EPA 904.0 | 465101 |  |  |
| 60380371003 | MW-5-091321 | EPA 904.0 | 465101 |  |  |
| 60380371004 | MW-6-091321 | EPA 904.0 | 465101 |  |  |
| 60380371005 | TEC-322LF-DUP-091321 | EPA 904.0 | 465101 |  |  |
| 60380371001 | MW-1-091321 | Total Radium Calculation | 467224 |  |  |
| 60380371002 | MW-4-091321 | Total Radium Calculation | 467224 |  |  |
| 60380371003 | MW-5-091321 | Total Radium Calculation | 467224 |  |  |
| 60380371004 | MW-6-091321 | Total Radium Calculation | 467224 |  |  |
| 60380371005 | TEC-322LF-DUP-091321 | Total Radium Calculation | 467224 |  |  |
| 60380371001 | MW-1-091321 | SM 2540C | 743948 |  |  |
| 60380371002 | MW-4-091321 | SM 2540C | 743948 |  |  |
| 60380371003 | MW-5-091321 | SM 2540C | 743948 |  |  |
| 60380371004 | MW-6-091321 | SM 2540C | 743948 |  |  |
| 60380371005 | TEC-322LF-DUP-091321 | SM 2540C | 743948 |  |  |
| 60380371001 | MW-1-091321 | SM 4500-H+B | 743958 |  |  |
| 60380371002 | MW-4-091321 | SM 4500-H+B | 743958 |  |  |
| 60380371003 | MW-5-091321 | SM 4500-H+B | 744237 |  |  |
| 60380371004 | MW-6-091321 | SM 4500-H+B | 743958 |  |  |
| 60380371005 | TEC-322LF-DUP-091321 | SM 4500-H+B | 743958 |  |  |
| 60380371001 | MW-1-091321 | EPA 300.0 | 743926 |  |  |
| 60380371002 | MW-4-091321 | EPA 300.0 | 743926 |  |  |
| 60380371003 | MW-5-091321 | EPA 300.0 | 743926 |  |  |
| 60380371004 | MW-6-091321 | EPA 300.0 | 743926 |  |  |

## REPORT OF LABORATORY ANALYSIS

## QUALITY CONTROL DATA CROSS REFERENCE TABLE

| Project: | TEC 322 LANDFILL CCR |
| :--- | :--- |
| Pace Project No.: | 60380371 |

Lab ID
60380371005
TEC-322LF-DUP-091321 $\frac{\text { QC Batch Method }}{\text { EPA } 300.0}$

WO\#: 60380371
||||||||||||||||||||||

Client Name: Courier:

FedEx $\square$

## Evergy放

 Pace $\square \quad$ Xroads $\square$ Client Other $\square$ Tracking \#: Pace Shipping Label Used? Yes $\square$ No $\square$Custody Seal on Cooler/Box Present: Yes No $\square$ Seals intact: Yes No $\square$
Packing Material: Bubble Wrap $\square$ Bubble Bags $\square$ Foam $\square$ None $\square$ Other $\mathbb{C P L}$ Thermometer Used: T 2944 3.C Type of Ice: Net Blue None
 Temperature should be above freezing to $6^{\circ} \mathrm{C}$ A1V2/MLC


Comments/ Resolution:
$\qquad$ Date: $\qquad$

CHAIN-OF-CUSTODY / Analytical Request Document
The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

## Section A

Required Client Information:
Company: EVERGY KANSAS CENTRAL, INC.

| Address: | Jeffrey Energy Center (JEC) |
| :--- | :--- |
|  | 818 Kansas Ave, Topeka, KS 66612 | Email To: melissa.michels@evergy.com


| Phone: $785-575-8113$ | Fax |
| :--- | :--- |
| Requested Due Date/TAT: | 7 da |

Section B
Section B
Required Project Information:
Report To: Melissa Michels, Samantha Kaney, Danielle Ober Aftention: Accounts Payable

| Copy To: | Jared Morrison, Jake Humphrey, Laura Hines |
| :--- | :--- |
|  | JD Schlegel, Brandon Will, Sarah Hazelwood |
| Purchase Order No.: |  |


| Project Name: $\quad$ TEC 322 Landfill CCR |
| :--- |
| Project Number: |

Section C
Invoice Information:

| Company Name: EVERGY KANSAS CENTRAL, INC | REGULATORY AGENCY |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Address: See Section A | $\begin{array}{\|ll} \hline \Gamma & \text { NPDES } \\ \Gamma^{-} & \text {UST } \end{array}$ | GROUND WATER <br> $\Gamma^{-}$RCRA |  |  | DRINKING WATER |
| Pace Quote Reference: |  |  |  | $\Gamma$ | OTHER |
| Pace Project Hank Kapka, 913-563-1404 | Site Location |  | KS |  | 5. |
| Pace Profile \#: 9657, 1 |  |  |  |  |  |




# Quality Control Sample Performance Assessment 

| Analyst: | SLC |
| ---: | :---: |
| Date: | $9 / 23 / 2021$ |
| Batch ID: | 62796 |
| Matrix: | DW |


| Method Blank Assessment |  |  |
| :--- | ---: | :---: |
|  | MB Sample ID | 2245931 |
|  | MB concentration: | -0.107 |
|  | MB Counting Uncertainty: | 0.257 |
|  | MB MDC: | 0.642 |
|  | MB Numerical Performance Indicator: | -0.82 |
|  | MB Status vs Numerical Indicator: | N/A |
|  | MB Status vs. MDC: | Pass |


| Laboratory Control Sample Assessment | LCSD ( Y or N$)$ ? | N |
| :---: | :---: | :---: |
|  | LCS62796 | LCSD62796 |
| Count Date: | 9/28/2021 |  |
| Spike I.D.: | 20-032 |  |
| Spike Concentration ( $\mathrm{pCi} / \mathrm{mL}$ ): | 32.170 |  |
| Volume Used (mL): | 0.10 |  |
| Aliquot Volume ( $\mathrm{L}, \mathrm{g}, \mathrm{F}$ ): | 0.661 |  |
| Target Conc. ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): | 4.866 |  |
| Uncertainty (Calculated): | 0.229 |  |
| Result ( $\mathrm{pCli/L}, \mathrm{~g}, \mathrm{~F}$ ): | 4.970 |  |
| LCS/LCSD Counting Uncertainty ( $\mathrm{pCli/L}, \mathrm{~g}, \mathrm{~F}$ ): | 1.127 |  |
| Numerical Performance indicator: | 0.18 |  |
| Percent Recovery: | 102.15\% |  |
| Status vs Numerical Indicator: | N/A |  |
| Status vs Recovery: | Pass |  |
| Upper \% Recovery Limits: Lower \% Recovery Limils: | 135\% $73 \%$ |  |

Analyst Must Manually Enter All Fields Highlighted in Yellow.

| Sample Matrix Spike Control Assessment | MS/MSD 1 | MS/MSD 2 |
| :---: | :---: | :---: |
| Sample Collection Date: | 9/13/2021 |  |
| Sample I.D. <br> Sample MS I.D. | $\begin{aligned} & 30441751001 \\ & 30441751001 \mathrm{MS} \end{aligned}$ |  |
| Sample MSD ID. |  |  |
| Spike I.D.:- | 20-032 |  |
| MS/MSD Decay Corrected Spike Concentration ( $\mathrm{pCi} / \mathrm{mL}$ ) : | 32.170 |  |
| Spike Volume Used in MS (mL): | 0.20 |  |
| Spike Volume Used in MSD (mL): |  |  |
| MS Aliquot ( $\mathrm{L}, \mathrm{g}, \mathrm{F}$ ) $^{\text {, }}$ | 0.655 |  |
| MS Target Conc. (pCi/L, g, F): | 9.827 |  |
| MSD Aliquot (L, g, F): <br> MSD Target Conc. ( $\mathrm{pCi/L}, \mathrm{~g}, \mathrm{~F}$ ): |  |  |
| MS Spike Uncertainty (calculated): | 0.462 |  |
| MSD Spike Uncertainty (calculated): |  |  |
| Sample Result: | 0.180 |  |
| Sample Result Counting Uncertainty ( $\mathrm{pCiLL}, \mathrm{g}, \mathrm{F}$ ): | 0.312 |  |
| Sample Matrix Spike Result: | 9.201 |  |
| Matrix Spike Result Counting Uncertainty (pCi/L, g, F): Sample Matrix Spike Duplicate Result: | 1.425 |  |
| Matrix Spike Duplicate Result Counting Uncertainty ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): MS Numerical Performance Indicator: | -1.032 |  |
| MSD Numerical Performance Indicator: |  |  |
| MS Percent Recovery: | 91.80\% |  |
| MSD Percent Recovery: |  |  |
| MS Status vs Numerical Indicator: | N/A |  |
| MSD Status vs Numerical Indicator: |  |  |
| MS Status vs Recovery: | Pass |  |
| MSD Status vs Recovery: |  |  |
| MS/MSD Upper \% Recovery Limits: | 136\% |  |
| MS/MSD Lower \% Recovery Limits:] | 71\% |  |


| Duplicate Sample Assessment |  |  |
| :---: | :---: | :---: |
| Sample I.D.: <br> Dupicate Sample I.D. <br> Sample Result ( $\mathrm{pCl} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): <br> Sample Result Counting Uncertainty ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): <br> Sample Duplicate Result ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): <br> Sample Duplicate Result Counting Uncertainty ( $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ): <br> Are sample and/or duplicate results below RL? | 30440891002 30440891002 DUP 0.226 0.391 0.152 0.421 See Below \#\# | Enter Duplicate sample IDs if other than LCS/LCSD in the space below. |
| Duplicate Numerical Performance Indicator: | 0.254 | 30440891002 |
| Duplicate RPD: | 39.43\% | 30440891002 DUP |
| Duplicate Status vs Numerical Indicator: |  |  |
| Duplicate Status vs RPD: $\%$ RPD Limit |  |  |


\#\# Evaluation of duplicate precision is not applicable if either the sample or duplicate results are below the RL.

## Comments



$$
\int / 4 / b / 20 / 2
$$

## Quality Control Sample Performance Assessment


Analyst Must Manually Enter All Fields Highlighted in Yellow．

| Sample Matrix Spike Control Assessment | MS／MSD 1 | MS／MSD 2 |
| :---: | :---: | :---: |
| Sample Collection Date： | 9／14／2021 |  |
| Sample I．D． Sample MS I．D． | $\begin{aligned} & 92561269001 \\ & 92561269001 \mathrm{MS} \end{aligned}$ |  |
| Sample MSD I．D． Spike I．D． | 21－029 |  |
| MS／MSD Decay Corrected Spike Concentration（pCi／mL） | 38.227 |  |
| Spike Volume Used in MS（mi）： | 0.20 |  |
| Spike Volume Used in MSD（mL）： |  |  |
| MS Aliquat（ $L$ ，g，F） | 0.806 |  |
| MS Target Conc．（pCl／L，g，F）： | 9.486 |  |
| MSD Aliquot（ $\mathrm{L}, \mathrm{g}, \mathrm{F}$ ）： <br> MSD Target Conc．（ $\mathrm{pCi/L}, \mathrm{~g}, \mathrm{~F}$ ） |  |  |
| MS Spike Uncertainty（calculated）： | 0.465 |  |
| MSD Spike Uncertainty（calculated）： |  |  |
| Sample Result： | 0.308 |  |
| Sample Result 2 Sigma CSU（ $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ）： | 0.351 |  |
| Sample Matrix Spike Result： | 9.101 |  |
| Matrix Spike Result 2 Sigma CSU（pCiL，g，F）： | 1.844 |  |
| Sample Matrix Spike Duplicate Result <br> Matrix Spike Duplicate Result 2 Sigma CSU（ $\mathrm{pCi} / \mathrm{L}, \mathrm{g}, \mathrm{F}$ ）： |  |  |
| MS Numerical Performance indicator： | －0．703 |  |
| MSD Numerical Performance Indicator： |  |  |
| MS Percent Recovery： MSD Percent Recovery： | 92．69\％ |  |
| MS Status vs Numerical Indicator： | Pass |  |
| MSD Status vs Numerical Indicator： |  |  |
| MS Status vs Recovery： | Pass |  |
| MSD Status vs Recovery： |  |  |
| MS／MSD Upper \％Recovery Limits： | 135\％ |  |
| MS／MSD Lower \％Recovery Limits： | 60\％ |  |



\＃\＃Evaluation of duplicate precision is not applicable if either the sample or duplicate resuits are below the MDC．

## Comments

The method blank result is below the reporting timit for this analysis and is acceptable．

## ATTACHMENT 2

Statistical Analyses

## ATTACHMENT 2-1

September 2020 Semi-Annual Sampling Event Statistical Analyses

## TECHNICAL MEMORANDUM

January 15, 2021
File No. 129778-039

TO: Evergy Kansas Central, Inc.
Jared Morrison - Director, Water and Waste Programs
FROM: Haley \& Aldrich, Inc.
Steven F. Putrich, P.E., Principal Consultant - Engineering Principal Mark Nicholls, P.G., Senior Associate - Senior Hydrogeologist

SUBJECT: September 2020 Semi-Annual Groundwater Assessment Monitoring Data Statistical Evaluation
Completed January 15, 2021
Tecumseh Energy Center
322 Landfill

Pursuant to Title 40 Code of Federal Regulations (40 CFR) §§ 257.93 and 257.95 (Rule), this memorandum summarizes the statistical evaluation of the analytical results for the September 2020 semi-annual assessment monitoring groundwater sampling event for the Tecumseh Energy Center (TEC) 322 Landfill. This semi-annual assessment monitoring groundwater sampling event was completed on
September 16, 2020, with laboratory results received and validated on October 26, 2020.
The statistical evaluation discussed in this memorandum was conducted to determine if Appendix IV groundwater monitoring constituents have been detected in downgradient wells at concentrations that represent a statistically significant increase (SSI) above background values and if one or more of the constituents have been detected at statistically significant levels (SSL) above the Groundwater Protection Standard (GWPS) consistent with the requirements of the Rule. GWPSs for each of the Appendix IV constituents have been set equal to the highest value of the maximum contaminant level, levels provided in 40 CFR $\S 257.95(\mathrm{~h})(2)$ (from regional screening levels), or background concentrations.

## Statistical Evaluation of Appendix IV Constituents

The Rule provides four specific options for statistical evaluation of groundwater quality data collected at a coal combustion residuals (CCR) unit (40 CFR § 257.93(f) (1-4)). The statistical method used for these evaluations, tolerance limit (TL), was certified by Haley \& Aldrich, Inc. on January 14, 2019. The TL method, as determined applicable for this sampling event, was used to evaluate potential SSLs above background. Background levels for each constituent listed in Appendix IV were computed as upper tolerance limits (UTL), and a minimum 95 percent confidence coefficient and 95 percent coverage. The
most recent groundwater sampling event from each compliance well was compared to the corresponding background UTL to determine if an SSI existed.

## STATISTICAL EVALUATION

An interwell evaluation was used to determine SSIs. Interwell evaluation compares the most recent values from downgradient compliance wells against a background dataset composed of upgradient well data. Because the CCR unit has transitioned into assessment monitoring, no statistical evaluations were conducted on Appendix III (detection monitoring) semi-annual assessment monitoring data.

The parametric TL methods were used to complete statistical evaluations of the referenced dataset. The TL procedure is one in which a concentration limit for each constituent is established from the distribution of the background data, with a minimum 95 percent confidence level. The upper endpoint of a tolerance interval is called the UTL. Depending on the data distribution, parametric or non-parametric TL procedures are used to evaluate groundwater monitoring data using this method. Parametric TLs utilize normally distributed data or normalized data via a transformation of the sample background data used to construct the limit. If the data are non-normal and a transformation is not indicated, non-parametric procedures (order statistics or bootstrap methods) are used to calculate the TL. If all the background data are non-detect, a maximum reporting limit may serve as an appropriate UTL.

These statistical evaluations were conducted using the background dataset for all Appendix IV constituents that were detected in the annual assessment monitoring sample event using parametric TLs. If an Appendix IV constituent concentration from the September $\mathbf{2 0 2 0}$ sampling event was above the GWPS, the lower confidence limit (LCL) for the downgradient well constituent will be used to evaluate if an SSI is present. The LCL is the lower end of the confidence interval range, which is an estimated concentration range intended to contain the true mean or median of the population from which the sample is drawn. The confidence interval range is designed to locate the true population mean or median with a high degree of statistical confidence, or conversely, with a low probability of error.

The UTLs were calculated from the background well dataset using Chemstat software after testing for outlier sample results that would warrant removal from the dataset based on likely error in sampling or measurement. Both visual and statistical outlier tests for the background data were performed using Chemstat and U.S. Environmental Protection Agency's ProUCL 5.1 software, and a visual inspection of the data was performed using box plots and distribution plots for the downgradient sample data. No sample data were identified as outliers that warranted removal from the dataset.

## BACKGROUND DISTRIBUTIONS

The groundwater analytical results for each sampling event from the background sample location (MW-4) were combined to calculate the UTL for each detected Appendix IV constituent. The variability and distribution of the pooled dataset were evaluated to determine the method for UTL calculation. Per the document, Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance,

March 2009, background concentrations were updated based on statistical evaluation of analytical results collected through March 2020 for all constituents except molybdenum, which was updated through September 2020.

## RESULTS OF APPENDIX IV DOWNGRADIENT STATISTICAL COMPARISONS

The sample concentrations from the downgradient wells for each of the detected Appendix IV constituents from the September 2020 semi-annual assessment monitoring event were compared to their respective background UTLs and GWPSs (Table I). A sample concentration greater than the background UTL is considered to represent an SSI. A sample concentration greater than the GWPS is considered to represent an SSL. The results of the groundwater assessment monitoring statistical evaluation are provided in Table I. Based on this statistical evaluation on groundwater sampling data collected in September 2020, no SSLs above GWPS occurred at the TEC 322 Landfill.

Tables:
Table I - Summary of Semi-Annual Assessment Groundwater Monitoring Statistical Evaluation

TABLE


## Notes and Abbreviations

Based on background data collected from 08/17/2016 through 03/08/2020, unless otherwise noted.
保
Values obtained from U.S. Environmental Protection Agency Federal CCR Rule Title 40 Code of Federal Regulations (CFR) \& $257.95(h)(2)$ on December 23, 2020.
CCR = coal combustion residuals
WPS $=$ Groundwater Protection Stand
mCL = maximum contamina
$N A=$ not analyzed
pCi/L = picoCuries per Liter
ssl = statistically significant increase
SSL = statistically significant level
UTL $=$ upper tolerance limits

## ATTACHMENT 2-2

March 2021 Semi-Annual Sampling Event Statistical Analyses

## TECHNICAL MEMORANDUM

July 15, 2021
File No. 129778-039

TO: Evergy Kansas Central, Inc. Jared Morrison - Director, Water and Waste Programs

FROM: Haley \& Aldrich, Inc.
Steven F. Putrich, P.E., Principal Consultant - Engineering Principal Mark Nicholls, P.G., Senior Associate - Senior Hydrogeologist

SUBJECT: March 2021 Semi-Annual Groundwater Assessment Monitoring Data Statistical Evaluation
Completed July 15, 2021
Tecumseh Energy Center
322 Landfill
Pursuant to Title 40 Code of Federal Regulations ( 40 CFR) $\S \S 257.93$ and 257.95 (Rule), this memorandum summarizes the statistical evaluation of the analytical results for the March 2021 semi-annual assessment monitoring groundwater sampling event for the Tecumseh Energy Center (TEC) 322 Landfill. This semi-annual assessment monitoring groundwater sampling event was completed on March 8, 2021, with laboratory results received and validated on April 16, 2021.

The statistical evaluation discussed in this memorandum was conducted to determine if Appendix IV groundwater monitoring constituents have been detected in downgradient wells at concentrations that represent a statistically significant increase (SSI) above background values and if one or more of the constituents have been detected at statistically significant levels (SSL) above the Groundwater Protection Standard (GWPS) consistent with the requirements of the Rule. GWPSs for each of the Appendix IV constituents have been set equal to the highest value of the maximum contaminant level, levels provided in 40 CFR $\S 257.95(\mathrm{~h})(2)$ (from regional screening levels), or background concentrations.

## Statistical Evaluation of Appendix IV Constituents

The Rule provides four specific options for statistical evaluation of groundwater quality data collected at a coal combustion residuals (CCR) unit ( 40 CFR $\S 257.93$ (f) (1-4)). The statistical method used for these evaluations, tolerance limit (TL), was certified by Haley \& Aldrich, Inc. on January 14, 2019. The TL method, as determined applicable for this sampling event, was used to evaluate potential SSLs above background. Background levels for each constituent listed in Appendix IV were computed as upper tolerance limits (UTL), and a minimum 95 percent confidence coefficient and 95 percent coverage. The
most recent groundwater sampling event from each compliance well was compared to the corresponding background UTL to determine if a SSI existed.

## STATISTICAL EVALUATION

An interwell evaluation was used to determine SSIs. Interwell evaluation compares the most recent values from downgradient compliance wells against a background dataset composed of upgradient well data. Because the CCR unit has transitioned into assessment monitoring, no statistical evaluations were conducted on Appendix III (detection monitoring) semi-annual assessment monitoring data.

The parametric TL methods were used to complete statistical evaluations of the referenced dataset. The TL procedure is one in which a concentration limit for each constituent is established from the distribution of the background data, with a minimum 95 percent confidence level. The upper endpoint of a tolerance interval is called the UTL. Depending on the data distribution, parametric or non-parametric TL procedures are used to evaluate groundwater monitoring data using this method. Parametric TLs utilize normally distributed data or normalized data via a transformation of the sample background data used to construct the limit. If the data are non-normal and a transformation is not indicated, non-parametric procedures (order statistics or bootstrap methods) are used to calculate the TL. If all the background data are non-detect, a maximum reporting limit may serve as an appropriate UTL.

These statistical evaluations were conducted using the background dataset for all Appendix IV constituents that were detected in the annual assessment monitoring sample event using parametric TLs. If an Appendix IV constituent concentration from the March 2021 sampling event was above the GWPS, the lower confidence limit (LCL) for the downgradient well constituent will be used to evaluate if a SSI is present. The LCL is the lower end of the confidence interval range, which is an estimated concentration range intended to contain the true mean or median of the population from which the sample is drawn. The confidence interval range is designed to locate the true population mean or median with a high degree of statistical confidence, or conversely, with a low probability of error.

The UTLs were calculated from the background well dataset using Chemstat software after testing for outlier sample results that would warrant removal from the dataset based on likely error in sampling or measurement. Both visual and statistical outlier tests for the background data were performed using Chemstat and U.S. Environmental Protection Agency's ProUCL 5.1 software, and a visual inspection of the data was performed using box plots and distribution plots for the downgradient sample data. No sample data were identified as outliers that warranted removal from the dataset.

## BACKGROUND DISTRIBUTIONS

The groundwater analytical results for each sampling event from the background sample location (MW-4) were combined to calculate the UTL for each detected Appendix IV constituent. The variability and distribution of the pooled dataset were evaluated to determine the method for UTL calculation. Per the document, Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance, March 2009, background concentrations were updated based on statistical evaluation of analytical results collected through March 2020 for all constituents except molybdenum, which was updated through September 2020.

## RESULTS OF APPENDIX IV DOWNGRADIENT STATISTICAL COMPARISONS

The sample concentrations from the downgradient wells for each of the detected Appendix IV constituents from the March 2021 semi-annual assessment monitoring event were compared to their respective background UTLs and GWPSs (Table I). A sample concentration greater than the background UTL is considered to represent a SSI. A sample concentration greater than the GWPS is considered to represent a SSL. The results of the groundwater assessment monitoring statistical evaluation are provided in Table I. Based on this statistical evaluation on groundwater sampling data collected in March 2021, no SSLs above GWPS occurred at the TEC 322 Landfill.

Tables:
Table I - Summary of Semi-Annual Assessment Groundwater Monitoring Statistical Evaluation

TABLE
tecumseh energy center
322 LANDFILL

|  |  |  |  |  |  |  |  |  |  | MCL Comparison |  |  |  |  |  | Inter-well Analysis |  |  |  | Groundwater Protection Standard |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Location Id | $\begin{array}{\|c\|} \hline \text { Frequency of } \\ \text { Detection } \end{array}$ | $\begin{array}{\|c\|\|} \hline \text { Percent } \\ \text { Non-Detects } \end{array}$ | $\begin{aligned} & \text { Maximum } \\ & \text { Detect } \end{aligned}$ | Variance | Standard Deviation | $\begin{array}{\|c\|} \text { Coefficient of } \\ \text { Variance } \end{array}$ | $\begin{aligned} & \text { CCR MCL/RSL } \\ & \S 257.95(\mathrm{~h})(2)^{*} \end{aligned}$ | Report Result Unit | Detection <br> Exceedances <br> (Y/N) | $\begin{gathered} \text { Number of } \\ \text { Detection } \\ \text { Exceedances } \end{gathered}$ | Number of <br> Non- <br> Detection <br> Exceedances | $\begin{array}{\|c\|c} \text { Outlier } \\ \text { Presence } \end{array}$ | $\begin{array}{\|c\|} \hline \text { Outlier } \\ \text { Removed } \end{array}$ | Trend | Distribution Well* | March 2021 <br> Concentration <br> (mg/L) | Detect? | Upper <br> Tolerance <br> Limit $\left(\mathrm{mg} / \mathrm{L}^{2}\right.$$\|$ | SSI (exceedance <br> above <br> Background at <br> Individual Welli) | GWPS (Higher of MCL/RSL or Upper Tolerance Limit) mg/L | Exceedance above GWPS at Individual Well | SSL |
|  | CCR Appendix-V: Barium, Total (mg/L) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| MW-4 (upgradient) | 17/17 | 0\% | 0.14 | 0.0001557 | 0.01248 | 0.1111 | 2.0 | mg/L | N | 0 | 0 | No | No | Decreasing | Normal | 0.095 | $r$ | 0.137 |  | 2.0 |  |  |
| MW-1 | 17/17 | 0\% | 0.2 | 0.002867 | 0.05354 | 0.4252 | 2.0 | mg/L | N | 0 | 0 | No | No | Stable | Normal | 0.091 | Y |  | N |  | N | No |
| MW-5 | 17/17 | 0\% | 0.04 | 0.00004314 | 0.006568 | 0.2684 | 2.0 | mg/L | N | 0 | 0 | No | No | Decreasing | Normal | 0.017 | Y |  | N |  | N | No |
| MW-6 | 17/17 | 0\% | 0.041 | 0.00005387 | 0.007339 | ${ }^{0.3283}$ | 2.0 | mg/L | N | 0 | 0 | No | No | Decreasing | Normal | 0.018 | Y |  | N |  | N | No |
|  | CCR Appendix-VV: Cobalt, Total ( $\mathrm{m} / \mathrm{L}$ ) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| MW-4 (upgradient) | 0/17 | 100\% |  | 0 | 0 | 0 | 0.006 | mg/L | N | 0 | 0 | NA | NA | NA | NA | 0.0010 | N | 0.001 |  | 0.006 |  |  |
| MW-1 | 12/17 | 29\% | 0.0086 | 0.000004003 | 0.002001 | 0.9318 | 0.006 | mg/L | Y | 1 | 0 | Yes | No | Stable | Non-parametric | 0.0010 | N |  | N |  | N | No |
| MW-5 | 17/17 | 0\% | 0.0021 | 1.0266-07 | 0.0003203 | 0.1821 | 0.006 | mg/L | N | 0 | 0 | No | No | Stable | Normal | 0.0015 | r |  | Y |  | N | No |
| MW-6 | 17/17 | 0\% | 0.0033 | $3.063 \mathrm{E}-07$ | 0.0005535 | 0.2346 | 0.006 | mg/L | N | 0 | 0 | No | No | Stable | Normal | 0.0023 | r |  | Y |  | N | No |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| MW-4 (upgradient) | 13/18 | 28\% | 0.35 | 0.001449 | 0.03806 | 0.1612 | 4.0 | mg/L | N | 0 | 0 | Yes | No | Stable | Non-parametric | 0.20 | N | 0.350 |  | 4.0 |  |  |
| MW-1 | 17/18 | 6\% | 0.46 | 0.003318 | 0.0576 | 0.16 | 4.0 | mg/L | N |  | 0 | No | No | Stable | Normal | 0.20 | N |  | N |  | N | No |
| MW-5 | 14/18 | 22\% | 0.42 | 0.003901 | 0.06246 | 0.2213 | 4.0 | mg/L | N | 0 | 0 | No | No | Stable | Normal | 0.20 | N |  | N |  | N | No |
| MW-6 | 17/18 | 6\% | 0.5 | 0.005788 | 0.07608 | 0.2238 | 4.0 | m/L | N | 0 | 0 | No | No | Stable | Normal | 0.20 | N |  | N |  | N | No |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| MW-4 (upgradient) | 0/17 | 100\% |  | 1.355--20 | 1.164E-10 | 1.164E-08 | 0.040 | mg/L | N | 0 | 0 | NA | NA | NA | NA | 0.010 | N | 0.010 |  | 0.040 |  |  |
| MW-1 | 1/17 | 94\% | 0.01 | 1.355-20 | 1.164E-10 | 1.164E-08 | 0.040 | mg/L | N | 0 | 0 | NA | NA | NA | Non-parametric | 0.010 | N |  | N |  | N | No |
| MW-5 | 13/17 | 24\% | 0.024 | 0.00002331 | 0.004828 | 0.3231 | 0.040 | mg/L | N |  | 0 | No | No | Stable | Normal | 0.010 | Y |  | N |  | N | No |
| MW-6 | 12/17 | 29\% | 0.022 | 0.00001797 | 0.004239 | ${ }^{0.3093}$ | 0.040 | mg/L | N | 0 | 0 | No | No | Stable | Normal | 0.011 | r |  | Y |  | $N$ | No |
|  | CCR Appendix-V: : Molybdenum, Total ( $\mathrm{m} / \mathrm{LL}$ ) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| MW-4 (upgradient) | 0/14 | 100\% |  | 0 | 0 | 0 | 0.100 | mg/L | N | 0 | 0 | NA | NA | NA | NA | 0.0010 | N | $0.001^{2}$ |  | 0.100 |  |  |
| MW-1 | 3/14 | 79\% | 0.0011 | 1.8138-09 | 0.00004258 | 0.04169 | 0.100 | mg/L | N | 0 | 0 | No | No | NA | Non-parametric | 0.0010 | N |  | N |  | N | No |
| MW-5 | 1/14 | 93\% | 0.001 | 0 | 0 | 0 | 0.100 | mg/L | N | 0 | 0 | NA | NA | NA | NA | 0.0010 | N |  | N |  | N | No |
| MW-6 | 6/14 | 57\% | 0.0019 | 6.374E-08 | 0.0002525 | 0.2237 | 0.100 | m/ $/ \mathrm{L}$ | N | 0 | 0 | No | No | Stable | Non-parametric | 0.0010 | N |  | N |  | N | No |

## tes and Abbreviations:

Based on background data collected from 08/17/2016 through $09 / 16 / 2020$
Unes obtained from US. Environmental Protection Agency Federal CCR Rule Title 40 Code of Federal Requlations (CFR) $£ 257.95(h)(2)$
$C C R=$ coal combustion residuals
GWPS $=$ Groundwater Protection Standard
$M C L=$ maximum contaminant leve
$\mathrm{mg} / \mathrm{L}=$ milligrams per Liter
pCi/L $=$ picoCuries per Liter
SSI = statistically significant increas
SSL = statistically significant lead
UTL $=$ uper tolerance limits


[^0]:    Project Manager Review:

