

2024 ANNUAL GROUNDWATER MONITORING AND
CORRECTIVE ACTION REPORT
BOTTOM ASH SETTLING AREA/BOTTOM ASH LANDFILL
JEFFREY ENERGY CENTER
ST. MARYS, KANSAS

by
Haley & Aldrich, Inc.
Cleveland, Ohio

for
Evergy Kansas Central, Inc.
Topeka, Kansas

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**2024 Annual Groundwater Monitoring
and Corrective Action Report**

This Annual Groundwater Monitoring and Corrective Action Report documents the groundwater monitoring program for the Jeffrey Energy Center (JEC) Bottom Ash Settling Area/Bottom Ash Landfill (BASA/BAL) consistent with applicable sections of 257.90 through 257.98, and describes activities conducted in the prior calendar year (2024) and documents compliance with the U.S. Environmental Protection Agency Coal Combustion Residual Rule. I certify that the 2024 Annual Groundwater Monitoring and Corrective Action Report for the JEC BASA/BAL is, to the best of my knowledge, accurate and complete.

Signed: 
Professional Geologist

Print Name: Mark Nicholls
Kansas License No.: Professional Geologist No. 881
Title: Principal Consultant
Company: Haley & Aldrich, Inc.



1. Introduction

This 2024 Annual Groundwater Monitoring and Corrective Action Report (Annual Report) addresses the Bottom Ash Settling Area/Bottom Ash Landfill (BASA/BAL) at the Jeffrey Energy Center (JEC), operated by Evergy Kansas Central, Inc. (Evergy). This Annual Report was developed in accordance with the U.S. Environmental Protection Agency Coal Combustion Residual (CCR) Rule (Rule) effective October 19, 2015, including subsequent revisions, specifically Title 40 Code of Federal Regulations (40 CFR), subsection 257.90(e). The Annual Report documents the groundwater monitoring system for the BASA/BAL consistent with applicable sections of 257.90 through 257.98, and describes activities conducted in the prior calendar year (2024) and documents compliance with the Rule. The specific requirements for the Annual Report listed in § 257.90(e) of the Rule are provided in Sections 1 and 2 of this Annual Report and are in bold italic font, followed by a narrative describing how each Rule requirement has been met.

1.1 40 CFR § 257.90(e)(6) SUMMARY

A section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the CCR unit. At a minimum, the summary must specify all of the following:

1.1.1 40 CFR § 257.90(e)(6)(i) – Initial Monitoring Program

At the start of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95;

At the start of the current annual reporting period (January 1, 2024), the BASA/BAL was operating under a detection monitoring program in compliance with 40 CFR § 257.94.

1.1.2 40 CFR § 257.90(e)(6)(ii) – Final Monitoring Program

At the end of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in § 257.95;

At the end of the current annual reporting period (December 31, 2024), the BASA/BAL was operating under a detection monitoring program in compliance with 40 CFR § 257.94.

1.1.3 40 CFR § 257.90(e)(6)(iii) – Statistically Significant Increases

If it was determined that there was a statistically significant increase over background for one or more constituents listed in Appendix III to this part pursuant to § 257.94(e):

1.1.3.1 40 CFR § 257.90(e)(6)(iii)(a) – Statistically Significant Increase Constituents

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

No statistically significant increases (SSI) over background were identified during the 2024 calendar year. The statistical evaluation reports for semiannual assessment monitoring sampling events from September 2023 and March 2024 were completed in January 2024 and July 2024, respectively, and are included in Attachment 1.

1.1.3.2 40 CFR § 257.90(e)(6)(iii)(b) – Initiation of Assessment Monitoring

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

No SSIs over background were identified during the 2024 calendar year. Therefore, an assessment monitoring program was not initiated for the BASA/BAL in 2024.

1.1.4 40 CFR § 257.90(e)(6)(iv) – Statistically Significant Levels

If it was determined that there was a statistically significant level above the groundwater protection standard for one or more constituents listed in Appendix IV to this part pursuant to § 257.95(g) include all of the following:

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

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

The BASA/BAL remains in detection monitoring, and no Appendix IV constituents were collected or analyzed in 2024. Therefore, no statistically significant levels above the groundwater protection standard were identified for the BASA/BAL.

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

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

No assessment of corrective measures was required to be initiated in 2024 for this unit. The BASA/BAL remained in detection monitoring during 2024.

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

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

An assessment of corrective measures was not required for the BASA/BAL in 2024. 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 2024 for this unit. The BASA/BAL remained in detection monitoring during 2024.

1.1.5 40 CFR § 257.90(e)(6)(v) – Selection of Remedy

Whether a remedy was selected pursuant to § 257.97 during the current annual reporting period, and if so, the date of remedy selection; and

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

1.1.6 40 CFR § 257.90(e)(6)(vi) – Remedial Activities

Whether remedial activities were initiated or are ongoing pursuant to § 257.98 during the current annual reporting period.

No remedial activities were required during 2024.

2. 40 CFR § 257.90 Applicability

2.1 40 CFR § 257.90(a)

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

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

2.2 40 CFR § 257.90(e) – SUMMARY

Annual groundwater monitoring and corrective action report. For existing CCR landfills and existing CCR surface impoundments, no later than January 31, 2018, and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For new CCR landfills, new CCR surface impoundments, and all lateral expansions of CCR units, the owner or operator must prepare the initial annual groundwater monitoring and corrective action report no later than January 31 of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by this subpart, and annually thereafter. For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. For purposes of this section, the owner or operator has prepared the annual report when the report is placed in the facility's operating record as required by § 257.105(h)(1).

This Annual Report describes monitoring completed and actions taken for the groundwater monitoring system at the JEC BASA/BAL as required by the Rule. Groundwater sampling and analysis was conducted in accordance with requirements described in § 257.93, and the status of the groundwater monitoring program described in § 257.94 is provided in this report. This Annual Report documents the applicable groundwater-related activities completed in the calendar year 2024.

2.2.1 Status of the Groundwater Monitoring Program

The BASA/BAL remained in the detection monitoring program during 2024.

2.2.2 Key Actions Completed

The 2023 Annual Groundwater Monitoring and Corrective Action Report was completed in January 2024. Statistical evaluation was completed in January 2024 on analytical data from the September 2023 semiannual detection monitoring sampling event. Semiannual detection monitoring events were completed in March and September of 2024. Statistical evaluation was completed in July 2024 on analytical data from the March 2024 semiannual detection monitoring sampling event. Statistical

2024 Annual Groundwater Monitoring and Corrective Action Report

evaluation of the results from the September 2024 semiannual detection monitoring sampling event are due to be completed in January 2025 and will be reported in the next annual report.

2.2.3 Problems Encountered

Problems encountered during groundwater monitoring activities in 2024 consisted of a laboratory analytical error that necessitated reanalysis of select samples. The total dissolved solids concentration were reanalyzed for monitoring wells BAA-6 and BAA-7 following the March 2024 semiannual detection monitoring sampling event. Verification samples were collected from monitoring wells BAA-6 and BAA-7 in May 2024. The chloride concentration was reanalyzed for monitoring well BAA-3 following the September 2024 semiannual detection monitoring sampling event. A verification sample was collected from monitoring well BAA-3 in October 2024. The analytical results were revised accordingly. These were the only sampling and analysis problems encountered that needed to be addressed at the BASA/BAL in 2024.

2.2.4 Actions to Resolve Problems

The resolution to problems encountered in 2024 included collection of a confirmation groundwater sample from BAA-6 and BAA-7 in May 2024 and from BAA-3 in October 2024, as described above. The analytical results were revised accordingly. No other problems were encountered at the BASA/BAL in 2024. Therefore, no additional actions to resolve problems were required.

2.2.5 Project Key Activities for Upcoming Year

Key activities planned for 2025 include completion of the 2024 Annual Groundwater Monitoring and Corrective Action Report, statistical evaluation of semiannual detection monitoring analytical data collected in September 2024, and semiannual detection monitoring and subsequent statistical evaluations.

2.3 40 CFR § 257.90(e) – INFORMATION

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

2.3.1 40 CFR § 257.90(e)(1)

A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;

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

2.3.2 40 CFR § 257.90(e)(2) – Monitoring System Changes

Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;

No monitoring wells were installed or decommissioned in 2024.

2.3.3 40 CFR § 257.90(e)(3) – Summary of Sampling Events

In addition to all the monitoring data obtained under § 257.90 through § 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;

In accordance with § 257.94(b), two independent detection monitoring samples from each background and downgradient monitoring well were collected during 2024. A summary including the sample names, dates of sample collection, field parameters, and monitoring data obtained for the groundwater monitoring program for the BASA/BAL is provided in Table I of this report, with corresponding laboratory analytical reports provided in Attachment 2. Groundwater potentiometric elevation contour maps, along with calculated groundwater flow rates and directions, associated with each groundwater monitoring event in 2024 are shown on Figures 2 and 3.

2.3.4 40 CFR § 257.90(e)(4) – Monitoring Transition Narrative

A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and

There was no transition between monitoring programs in 2024. Only detection monitoring was conducted in 2024.

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

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

This Annual Report documents activities conducted to comply with § 257.90 through § 257.94 of the Rule. It is understood that there are supplemental references in § 257.90 through § 257.98 that must be placed in the Annual Report. The following requirements include relevant and required information in the Annual Report for the activities completed in calendar year 2024.

2.3.5.1 40 CFR § 257.94(d)(3) – Demonstration for Alternative Detection Monitoring Frequency

The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration for an alternative groundwater sampling and analysis frequency meets the requirements of this section. The owner or operator must include the demonstration providing the basis for the alternative monitoring frequency and the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority in the annual groundwater monitoring and corrective action report required by § 257.90(e).

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

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

The owner or operator may demonstrate that a source other than the CCR unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. The owner or operator must complete the written demonstration within 90 days of detecting a statistically significant increase over background levels to include obtaining a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority verifying the accuracy of the information in the report. If a successful demonstration is completed within the 90-day period, the owner or operator of the CCR unit may continue with a detection monitoring program under this section. If a successful demonstration is not completed within the 90-day period, the owner or operator of the CCR unit must initiate an assessment monitoring program as required under § 257.95. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

No alternate source demonstration or certification was required in 2024. Therefore, no demonstration or certification is applicable.

2.3.5.3 40 CFR § 257.95(c)(3) – Demonstration for Alternative Assessment Monitoring Frequency

The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration for an alternative groundwater sampling and analysis frequency meets the requirements of this section. The owner or operator must include the demonstration providing the basis for the alternative monitoring frequency and the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority in the annual groundwater monitoring and corrective action report required by § 257.90(e).

2024 Annual Groundwater Monitoring and Corrective Action Report

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

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

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

The BASA/BAL remains in detection monitoring, and no assessment monitoring samples were collected or analyzed in 2024. Consequently, Evergy is not required to establish groundwater protection standards for this CCR unit, and this criterion is not applicable.

2.3.5.5 40 CFR § 257.95(g)(3)(ii) – Assessment Monitoring Alternate Source Demonstration

Demonstrate that a source other than the CCR unit caused the contamination, or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. Any such demonstration must be supported by a report that includes the factual or evidentiary basis for any conclusions and must be certified to be accurate by a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority. If a successful demonstration is made, the owner or operator must continue monitoring in accordance with the assessment monitoring program pursuant to this section and may return to detection monitoring if the constituents in appendices III and IV to this part are at or below background as specified in paragraph (e) of this section. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

No assessment monitoring alternate source demonstration or certification was required in 2024. The BASA/BAL remained in detection monitoring during 2024.

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

2024 Annual Groundwater Monitoring
and Corrective Action Report

the Participating State Director or approval from EPA where EPA is the permitting authority attesting that the demonstration is accurate. The 90-day deadline to complete the assessment of corrective measures may be extended for no longer than 60 days. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer or the approval from the Participating State Director or approval from EPA where EPA is the permitting authority.

No assessment of corrective measures was required to be initiated in 2024. Therefore, no demonstration or certification is applicable for this unit.

TABLE

TABLE I
SUMMARY OF ANALYTICAL RESULTS - 2024 DETECTION MONITORING
EVERGY KANSAS CENTRAL, INC.
JEFFREY ENERGY CENTER
BOTTOM ASH SETTLING AREA / BOTTOM ASH LANDFILL
ST. MARYS, KANSAS

Location	Upgradient				Downgradient								
	MW-BAA-6				MW-BAA-2			MW-BAA-3			MW-BAA-7		
Measure Point (TOC)	1301.81				1226.56			1222.00			1213.15		
Sample Name	BAA-6-031324	JEC-BAA-DUP-031324	BAA-6-051424	BAA-6-090424	BAA-2-031324	BAA-2-090424	JEC-BAA-DUP-090424	BAA-3-031324	BAA-3-090424	BAA-3-102324	BAA-7-031324	BAA-7-051424	BAA-7-090424
Sample Date	03/13/2024	03/13/2024	05/14/2024	09/04/2024	03/13/2024	09/04/2024	09/04/2024	03/13/2024	09/04/2024	10/23/2024	03/13/2024	05/14/2024	09/04/2024
Final Lab Report Date	3/26/2024	3/26/2024	5/22/2024	9/19/2024	3/26/2024	9/19/2024	9/19/2024	3/26/2024	9/19/2024	11/19/2024	3/26/2024	5/22/2024	9/19/2024
Final Lab Report Revision Date	6/20/2024	6/20/2024	N/A	N/A	6/20/2024	N/A	N/A	6/20/2024	N/A	N/A	6/20/2024	N/A	N/A
Lab Data Reviewed and Validated	7/12/2024	7/12/2024	7/12/2024	12/16/2024	7/12/2024	12/16/2024	12/16/2024	7/12/2024	12/16/2024	12/16/2024	7/12/2024	7/12/2024	12/16/2024
Depth to Water (ft btoc)	78.79	78.79	76.58	77.55	22.09	22.26	22.26	16.11	15.51	17.20	22.92	22.32	24.31
Temperature (Deg C)	15.12	-	21.04	17.81	16.47	15.32	-	14.05	14.95	16.02	22.43	17.76	15.98
Conductivity (µS/cm)	3860	-	4060	4045	1390	1280	-	3210	3042	3890	1870	2170	2340
Turbidity (NTU)	3.0	-	0.0	0.0	19.5	10.0	-	31.4	6.0	0.5	1.3	0.0	1.0
pH, Field (su)	7.31	-	7.11	6.83	7.54	6.95	-	7.49	6.66	7.10	7.51	7.37	6.84
Dissolved Oxygen, Field (mg/L)	0.09	-	0.14	1.65	0.27	0.68	-	0.00	0.51	0.00	0.03	0.19	0.05
ORP, Field (mV)	105	-	-63	-73	121	108	-	47	-59	-72	117	-42	-39
Boron, Total (mg/L)	3.5	3.5	-	5.9	0.89	0.79	0.78	2.4	2.3	-	0.68	-	0.64
Calcium, Total (mg/L)	546	533	-	503	161	154	157	537	510	-	265	-	255
Chloride (mg/L)	268	277	-	284	129	107	106	143	74.9	81.2	156	-	149
Fluoride (mg/L)	0.86	0.84	-	0.72	0.29	0.49	0.50	1.10	1.0	-	< 0.20	-	0.52
Sulfate (mg/L)	1840	1990	-	1980	543	491	492	2020	1950	-	991	-	897
pH (su)	7.1	7.0	-	6.8	7.2	7.3	7.4	7.1	7.0	-	7.2	-	7.2
TDS (mg/L)	4460	2730	3310	3780	1060	1090	1120	2880	3220	-	1510	1450	1730

Notes:
Bold value: Detection above laboratory reporting limit.
µS/cm = micro Siemens per centimeter
Deg C = degrees Celsius
ft btoc = feet below top of casing
mg/L = milligrams per liter
mV = millivolt
NTU = Nephelometric Turbidity Unit
ORP = oxidation reduction potential
su = standard unit
TDS = total dissolved solids
TOC = top of casing

FIGURES

GIS: G:\Projects\Westar\GIS\Jeffrey_Energy_Center\Maps\2024_01\129778_054_0001_BASA_MONITORING_WELL_LOCATION_MAP.mxd - 1/29/2025 12:08:28 PM



LEGEND



MONITORING WELL



PIEZOMETER OBSERVATION ONLY



BOTTOM ASH SETTLING AREA /BOTTOM ASH
LANDFILL BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: GOOGLE EARTH



0 300 600
SCALE IN FEET

**HALEY
ALDRICH**

EVERGY KANSAS CENTRAL, INC.
JEFFREY ENERGY CENTER
ST. MARYS, KANSAS

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

evergy

JANUARY 2025

FIGURE 1

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LEGEND

- MONITORING WELL
- PIEZOMETER OBSERVATION ONLY
- ESTIMATED GROUNDWATER POTENTIOMETRIC OBSERVATION ELEVATION CONTOUR, IN FEET, DASHED WHERE INFERRED
- GROUNDWATER FLOW DIRECTION AND APPROXIMATE GROUNDWATER FLOW RATE (FEET/YEAR)
- BOTTOM ASH SETTLING AREA /BOTTOM ASH LANDFILL BOUNDARY

NOTES

- ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
- GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 13 MARCH 2024.
- THE GROUNDWATER FLOW RATE WAS APPROXIMATED USING THE HYDRAULIC GRADIENT CALCULATED FROM GROUNDWATER POTENTIOMETRIC ELEVATIONS MEASURED 13 MARCH 2024 AND THE CONDUCTIVITY VALUES AND EFFECTIVE POROSITY VALUES OBTAINED FROM SLUG TESTS COMPLETED APRIL 2016.
- GROUNDWATER ELEVATION IN **BOLD BLUE TEXT** AND IN FEET ABOVE MEAN SEA LEVEL (AMSL).
- AERIAL IMAGERY SOURCE: GOOGLE EARTH



0 300 600
SCALE IN FEET

HALEY
ALDRICH

EVERGY KANSAS CENTRAL, INC.
JEFFREY ENERGY CENTER
ST. MARYS, KANSAS

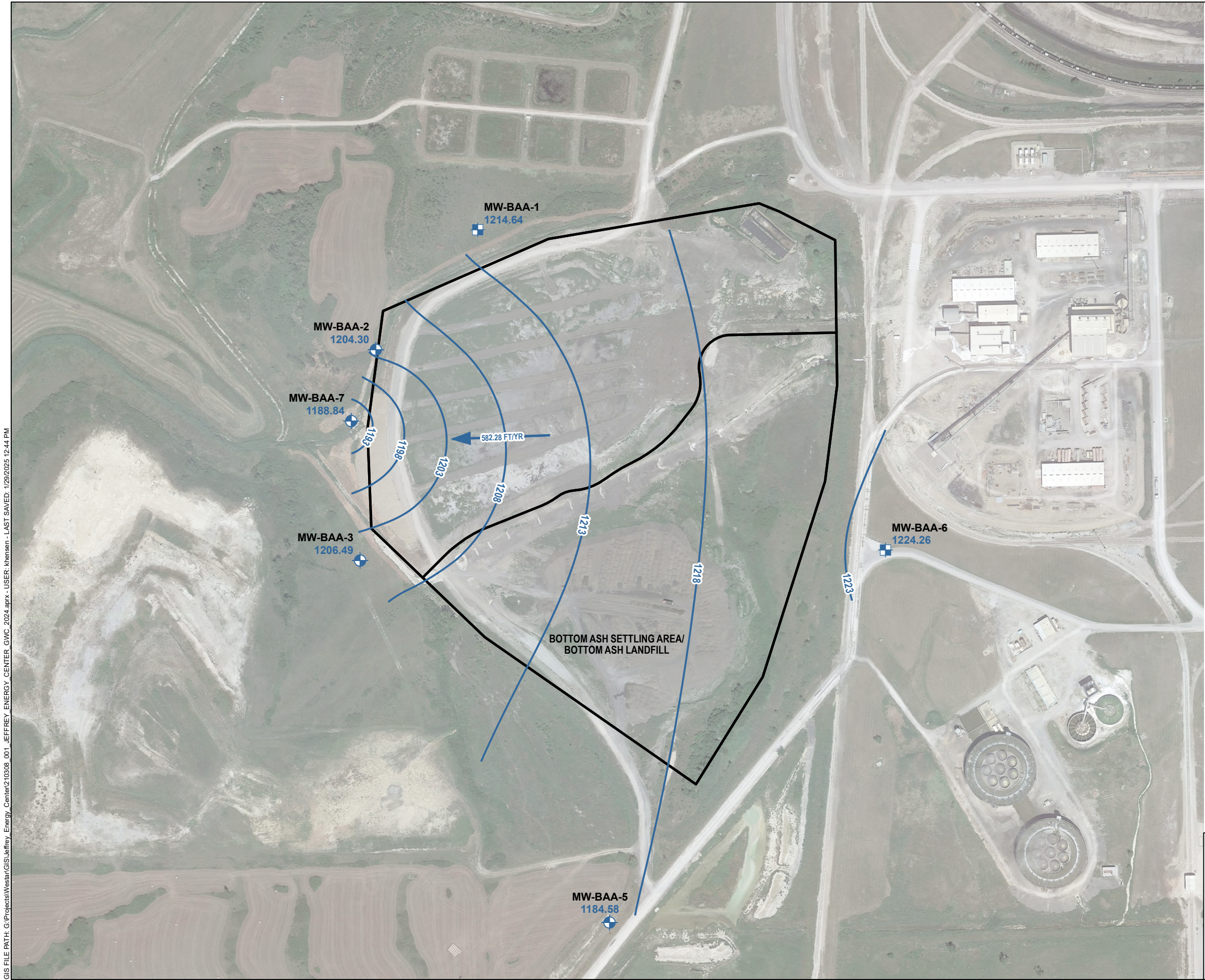
BOTTOM ASH SETTLING AREA/
BOTTOM ASH LANDFILL
GROUNDWATER POTENTIOMETRIC
ELEVATION CONTOUR MAP
MARCH 13, 2024

evergy

JANUARY 2025

FIGURE 2

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LEGEND

- MONITORING WELL
- PIEZOMETER OBSERVATION ONLY
- ESTIMATED GROUNDWATER POTENTIOMETRIC OBSERVATION CONTOUR, IN FEET
- GROUNDWATER FLOW DIRECTION AND APPROXIMATE GROUNDWATER FLOW RATE (FEET/YEAR)
- BOTTOM ASH SETTLING AREA/BOTTOM ASH LANDFILL BOUNDARY

NOTES

- ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
- GROUNDWATER POTENTIOMETRIC ELEVATIONS WERE MEASURED 4 SEPTEMBER 2024.
- THE GROUNDWATER FLOW RATE WAS APPROXIMATED USING THE HYDRAULIC GRADIENT CALCULATED FROM GROUNDWATER POTENTIOMETRIC ELEVATIONS MEASURED 4 SEPTEMBER 2024 AND THE CONDUCTIVITY VALUES AND EFFECTIVE POROSITY VALUES OBTAINED FROM SLUG TESTS COMPLETED APRIL 2016.
- GROUNDWATER ELEVATION IN **BOLD BLUE TEXT** AND IN FEET ABOVE MEAN SEA LEVEL (AMSL).
- AERIAL IMAGERY SOURCE: GOOGLE EARTH



0 300 600
SCALE IN FEET

HALEY
ALDRICH

EVERGY KANSAS CENTRAL, INC.
JEFFREY ENERGY CENTER
ST. MARYS, KANSAS

BOTTOM ASH SETTLING AREA/
BOTTOM ASH LANDFILL
GROUNDWATER POTENTIOMETRIC
ELEVATION CONTOUR MAP
SEPTEMBER 4, 2024

evergy

JANUARY 2025

FIGURE 3

ATTACHMENT 1
Statistical Analyses

ATTACHMENT 1-1
September 2023 Semiannual Groundwater Assessment
Monitoring Data Statistical Evaluation



HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Cleveland, OH 44131
216.739.0555

TECHNICAL MEMORANDUM

February 6, 2024
File No. 129778-050

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., Principal Consultant –Hydrogeologist

SUBJECT: September 2023 Semiannual Groundwater Detection Monitoring Data
Statistical Evaluation
Completed January 10, 2024
Jeffrey Energy Center
Bottom Ash Settling Area/Bottom Ash Landfill

Pursuant to Title 40 Code of Federal Regulations (40 CFR) §§ 257.93 and 257.94 (Rule), this memorandum summarizes the statistical evaluation of the analytical results for the **September 2023** semiannual detection monitoring groundwater sampling event for the Jeffrey Energy Center (JEC) Bottom Ash Settling Area/Bottom Ash Landfill (BASA/BAL). This semiannual detection monitoring groundwater sampling event was completed on **September 9, 2023**, with laboratory results received and validated on **December 13, 2023**.

The statistical evaluation discussed in this memorandum was conducted to determine if Appendix III groundwater monitoring constituents have been detected in downgradient wells at concentrations that represent a statistically significant increase (SSI) above background or upgradient wells consistent with the requirements in 40 CFR § 257.94.

Statistical Evaluation of Appendix III Constituents

The Rule provides four specific options for statistical evaluation of groundwater quality data collected at a coal combustion residual (CCR) unit (40 CFR § 257.93(f)(1-4)). The two statistical methods used for these evaluations, prediction limits (PL) and Parametric Analysis of Variance, were certified by Haley & Aldrich, Inc. on April 17, 2019. The PL method, as determined applicable for this sampling event, was used to evaluate potential SSIs above background. Background levels for each constituent listed in Appendix III (boron, calcium, chloride, fluoride, pH, sulfate, and total dissolved solids) were computed as upper prediction limits (UPL), considering one future observation, and a minimum 95 percent confidence coefficient. The most recent groundwater sampling event from each compliance well was compared to the corresponding background PL to determine if a SSI existed.

STATISTICAL EVALUATION

An interwell evaluation using the PL method was used to complete the statistical evaluation of the referenced dataset. Interwell evaluation compares the most recent values from downgradient compliance wells against a background dataset composed of upgradient well data (MW-BAA-6). A PL procedure is one in which a concentration limit for each constituent is established from the distribution of the background data, with a specified confidence level (e.g., 95 percent). The upper endpoint of a concentration limit is called the UPL. Depending on the background data distribution, parametric or non-parametric PL procedures are used to evaluate groundwater monitoring data using this method. Parametric PLs 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 PL. If all the background data are non-detect, a maximum reporting limit may serve as an appropriate UPL.

The statistical evaluation was conducted using the background dataset for all Appendix III constituents. The UPLs 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-BAA-6 were combined to calculate the UPL for each Appendix III constituent. The variability and distribution of the pooled dataset were evaluated to determine the method for UPL calculation. In accordance with the document titled *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 **September 2023**.

RESULTS OF APPENDIX III DOWNGRADIENT STATISTICAL COMPARISONS

Sample concentrations from the downgradient wells for each of the Appendix III constituents from the **September 2023** semiannual detection monitoring sampling event were compared to their respective background UPLs (Table I). A sample concentration greater than the background UPL is considered to represent a SSI. The results of the groundwater detection monitoring statistical evaluation are provided in Table I. **Based on this statistical evaluation of groundwater sampling data collected in September 2023, no SSIs above background PLs occurred at the JEC BASA/BAL.**

Attachments:

Table I – Summary of Semiannual Detection Groundwater Monitoring Statistical Evaluation

TABLE

TABLE I
SUMMARY OF SEMIANNUAL DETECTION GROUNDWATER MONITORING STATISTICAL EVALUATION
SEPTEMBER 2023 SAMPLING EVENT
JEFFREY ENERGY CENTER BOTTOM ASH SETTLING AREA/BOTTOM ASH LANDFILL
ST. MARYS, KANSAS

													Interwell	
Location Id	Frequency of Detection	Percent Non-Detects	Range of Non-Detect	Maximum Detect	Variance	Standard Deviation	Coefficient of Variance	Outlier Presence	Outlier Removed	Trend	Distribution Well	September 2023 Concentration (mg/L)	Background Limits ¹ (UPL) mg/L	SSI
CCR Appendix-III: Boron, Total (mg/L)														
MW-BAA-6 (upgradient)	20/20	0%	-	5.92	1.583	1.258	0.3111	No	No	Stable	Normal	4.5	8.95	
MW-BAA-2	20/20	0%	-	1.4	0.03357	0.1832	0.1708	No	No	Stable	Normal	0.80		No
MW-BAA-3	20/20	0%	-	2.5	0.01008	0.1004	0.04406	Yes	No	Stable	Non-parametric	2.3		No
MW-BAA-7	20/20	0%	-	1.3	0.09145	0.3024	0.3448	No	No	Decrease	Non-parametric	0.61		No
CCR Appendix-III: Calcium, Total (mg/L)														
MW-BAA-6 (upgradient)	20/20	0%	-	575	3080	55.49	0.1095	Yes	No	Increase	Non-parametric	531	575	
MW-BAA-2	20/20	0%	-	224	451.8	21.26	0.1191	No	No	Stable	Normal	187		No
MW-BAA-3	20/20	0%	-	552	628.7	25.07	0.04857	No	No	Stable	Normal	514		No
MW-BAA-7	20/20	0%	-	276	498.4	22.33	0.09571	No	No	Stable	Normal	251		No
CCR Appendix-III: Chloride (mg/L)														
MW-BAA-6 (upgradient)	20/20	0%	-	326	2046	45.23	0.1791	No	No	Increase	Normal	270	429	
MW-BAA-2	20/20	0%	-	220	1498	38.7	0.3003	No	No	Stable	Normal	98.8		No
MW-BAA-3	20/20	0%	-	189	327.3	18.09	0.1175	No	No	Stable	Normal	116		No
MW-BAA-7	20/20	0%	-	211	798	28.25	0.1567	Yes	No	Stable	Non-parametric	156		No
CCR Appendix-III: Fluoride (mg/L)														
MW-BAA-6 (upgradient)	15/20	25%	0.2-0.2	0.88	0.05622	0.2371	0.4658	No	No	Decrease	Normal	<0.20	1.434	
MW-BAA-2	19/20	5%	0.2-0.2	0.63	0.01194	0.1093	0.2286	No	No	Stable	Normal	0.36		No
MW-BAA-3	18/20	10%	0.2-0.2	1	0.08177	0.286	0.3915	No	No	Decrease	Non-parametric	0.33		No
MW-BAA-7	19/20	5%	0.2-0.2	0.9	0.03756	0.1938	0.2917	No	No	Decrease	Normal	0.34		No
CCR Appendix-III: pH (lab) (SU)														
MW-BAA-6 (upgradient)	20/20	0%	-	7.5	0.032	0.1789	0.02534	No	No	Stable	Normal	7.0	7.80	
MW-BAA-2	20/20	0%	-	8.5	0.09042	0.3007	0.04069	Yes	No	Decrease	Non-parametric	7.2		No
MW-BAA-3	20/20	0%	-	7.6	0.02997	0.1731	0.02437	Yes	No	Decrease	Normal	7.1		No
MW-BAA-7	20/20	0%	-	7.6	0.0325	0.1803	0.02461	No	No	Stable	Normal	7.2		No
CCR Appendix-III: Sulfate (mg/L)														
MW-BAA-6 (upgradient)	20/20	0%	-	2190	116000	340.6	0.1864	No	No	Stable	Non-parametric	2140	2190	
MW-BAA-2	20/20	0%	-	983	29440	171.6	0.2704	No	No	Stable	Normal	424		No
MW-BAA-3	20/20	0%	-	2290	13840	117.6	0.05839	No	No	Stable	Normal	2110		No
MW-BAA-7	20/20	0%	-	986	2734	52.29	0.05785	Yes	No	Stable	Non-parametric	850		No
CCR Appendix-III: Total Dissolved Solids (TDS) (mg/L)														
MW-BAA-6 (upgradient)	20/20	0%	-	4530	232100	481.8	0.1439	Yes	No	Increase	Normal	3920	5227	
MW-BAA-2	20/20	0%	-	1790	43680	209	0.1661	No	No	Stable	Normal	996		No
MW-BAA-3	20/20	0%	-	3780	58500	241.9	0.07306	No	No	Stable	Normal	3520		No
MW-BAA-7	20/20	0%	-	1990	8331	91.28	0.05044	No	No	Stable	Normal	1760		No

Notes:
¹ Based on background data collected from 08/25/2016 through 09/06/2023.
CCR = coal combustion residual
mg/L = milligrams per liter
SSI = statistically significant increase
SU = standard unit
UPL = upper prediction limit

ATTACHMENT 1-2
March 2024 Semiannual Groundwater Assessment
Monitoring Data Statistical Evaluation



HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Cleveland, OH 44131
216.739.0555

TECHNICAL MEMORANDUM

August 14, 2024
File No. 0210308-000

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., Principal Consultant –Hydrogeologist

SUBJECT: March 2024 Semiannual Groundwater Detection Monitoring Data
Statistical Evaluation
Completed July 29, 2024
Jeffrey Energy Center
Bottom Ash Settling Area/Bottom Ash Landfill

Pursuant to Title 40 Code of Federal Regulations (40 CFR) §§ 257.93 and 257.94 (Rule), this memorandum summarizes the statistical evaluation of the analytical results for the **March 2024** semiannual detection monitoring groundwater sampling event for the Jeffrey Energy Center (JEC) Bottom Ash Settling Area/Bottom Ash Landfill (BASA/BAL). This semiannual detection monitoring groundwater sampling event was completed on **March 13, 2024**, with laboratory results received and validated on **July 12, 2024**. Wells MW-BAA-6 and MW-BAA-7 were resampled on **May 22, 2024** to confirm the total dissolved solids concentrations collected on March 13, 2024.

The statistical evaluation discussed in this memorandum was conducted to determine if Appendix III groundwater monitoring constituents have been detected in downgradient wells at concentrations that represent a statistically significant increase (SSI) above background or upgradient wells consistent with the requirements in 40 CFR § 257.94.

Statistical Evaluation of Appendix III Constituents

The Rule provides four specific options for statistical evaluation of groundwater quality data collected at a coal combustion residual (CCR) unit (40 CFR § 257.93(f)(1-4)). The two statistical methods used for these evaluations, prediction limits (PL) and Parametric Analysis of Variance, were certified by Haley & Aldrich, Inc. on April 17, 2019. The PL method, as determined applicable for this sampling event, was used to evaluate potential SSIs above background. Background levels for each constituent listed in Appendix III (boron, calcium, chloride, fluoride, pH, sulfate, and total dissolved solids) were computed as upper prediction limits (UPL), considering one future observation, and a minimum 95 percent confidence coefficient. The most recent groundwater sampling event from each compliance well was compared to the corresponding background PL to determine if a SSI existed.

STATISTICAL EVALUATION

An interwell evaluation using the PL method was used to complete the statistical evaluation of the referenced dataset. Interwell evaluation compares the most recent values from downgradient compliance wells against a background dataset composed of upgradient well data (MW-BAA-6). A PL procedure is one in which a concentration limit for each constituent is established from the distribution of the background data, with a specified confidence level (e.g., 95 percent). The upper endpoint of a concentration limit is called the UPL. Depending on the background data distribution, parametric or non-parametric PL procedures are used to evaluate groundwater monitoring data using this method. Parametric PLs 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 PL. If all the background data are non-detect, a maximum reporting limit may serve as an appropriate UPL.

The statistical evaluation was conducted using the background dataset for all Appendix III constituents. The UPLs 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-BAA-6 were combined to calculate the UPL for each Appendix III constituent. The variability and distribution of the pooled dataset were evaluated to determine the method for UPL calculation. In accordance with the document titled *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 **September 2023**.

RESULTS OF APPENDIX III DOWNGRADIENT STATISTICAL COMPARISONS

Sample concentrations from the downgradient wells for each of the Appendix III constituents from the **March 2024** semiannual detection monitoring sampling event were compared to their respective background UPLs (Table I). A sample concentration greater than the background UPL is considered to represent a SSI. The results of the groundwater detection monitoring statistical evaluation are provided in Table I. **Based on this statistical evaluation of groundwater sampling data collected in March 2024, no SSIs above background PLs occurred at the JEC BASA/BAL.**

Attachments:

Table I – Summary of Semiannual Detection Groundwater Monitoring Statistical Evaluation

TABLE

TABLE I
SUMMARY OF SEMIANNUAL DETECTION GROUNDWATER MONITORING STATISTICAL EVALUATION
MARCH 2024 SAMPLING EVENT
JEFFREY ENERGY CENTER BOTTOM ASH SETTLING AREA/BOTTOM ASH LANDFILL
ST. MARYS, KANSAS

													Interwell Analysis	
Location Id	Frequency of Detection	Percent Non-Detects	Range of Non-Detect	Maximum Detect	Variance	Standard Deviation	Coefficient of Variance	Outlier Presence	Outlier Removed	Trend	Distribution Well	March 2024 Concentration (mg/L)	Background Limits ¹ (UPL) mg/L	SSI
CCR Appendix-III: Boron, Total (mg/L)														
MW-BAA-6	21/21	0%	-	5.92	1.518	1.232	0.3066	No	No	Stable	Normal	3.5	8.95	
MW-BAA-2	21/21	0%	-	1.4	0.03347	0.183	0.172	No	No	Stable	Normal	0.89		No
MW-BAA-3	21/21	0%	-	2.5	0.01028	0.1014	0.04437	No	No	Stable	Non-parametric	2.4		No
MW-BAA-7	21/21	0%	-	1.3	0.08872	0.2979	0.3433	No	No	Decrease	Non-parametric	0.68		No
CCR Appendix-III: Calcium, Total (mg/L)														
MW-BAA-6	21/21	0%	-	575	2999	54.76	0.1076	Yes	No	Increase	Non-parametric	546	575	
MW-BAA-2	21/21	0%	-	224	443.8	21.07	0.1186	No	No	Stable	Normal	161		No
MW-BAA-3	21/21	0%	-	552	617.9	24.86	0.04806	No	No	Stable	Normal	537		No
MW-BAA-7	21/21	0%	-	276	521.5	22.84	0.09727	No	No	Stable	Normal	265		No
CCR Appendix-III: Chloride (mg/L)														
MW-BAA-6	21/21	0%	-	326	1955	44.21	0.1745	No	No	Increase	Normal	268	429	
MW-BAA-2	21/21	0%	-	220	1423	37.72	0.2926	No	No	Stable	Normal	129		No
MW-BAA-3	21/21	0%	-	189	316.7	17.79	0.1159	Yes	No	Stable	Normal	143		No
MW-BAA-7	21/21	0%	-	211	786.1	28.04	0.1565	Yes	No	Stable	Non-parametric	156		No
CCR Appendix-III: Fluoride (mg/L)														
MW-BAA-6	16/21	24%	0.2-0.2	0.88	0.05928	0.2435	0.4631	No	No	Stable	Normal	0.86	1.434	
MW-BAA-2	20/21	5%	0.2-0.2	0.63	0.01303	0.1141	0.2434	No	No	Decrease	Normal	0.29		No
MW-BAA-3	19/21	10%	0.2-0.2	1.1	0.08419	0.2901	0.3878	No	No	Decrease	Non-parametric	1.10		No
MW-BAA-7	19/21	10%	0.2-0.2	0.9	0.04596	0.2144	0.3337	No	No	Decrease	Non-parametric	< 0.20		No
CCR Appendix-III: pH (lab) (SU)														
MW-BAA-6	21/21	0%	-	7.5	0.03048	0.1746	0.02472	No	No	Stable	Normal	7.1	7.80	
MW-BAA-2	21/21	0%	-	8.5	0.08762	0.296	0.0401	Yes	No	Decrease	Non-parametric	7.2		No
MW-BAA-3	21/21	0%	-	7.6	0.02848	0.1687	0.02375	Yes	No	Decrease	Normal	7.1		No
MW-BAA-7	21/21	0%	-	7.6	0.03162	0.1778	0.0243	No	No	Stable	Normal	7.2		No
CCR Appendix-III: Sulfate (mg/L)														
MW-BAA-6	21/21	0%	-	2190	110200	332	0.1816	No	No	Stable	Non-parametric	1840	2190	
MW-BAA-2	21/21	0%	-	983	28370	168.4	0.2673	No	No	Stable	Normal	543		No
MW-BAA-3	21/21	0%	-	2290	13150	114.7	0.05691	No	No	Stable	Normal	2020		No
MW-BAA-7	21/21	0%	-	991	2959	54.39	0.0599	Yes	No	Stable	Normal	991		No
CCR Appendix-III: Total Dissolved Solids (TDS) (mg/L)														
MW-BAA-6	21/21	0%	-	4530	220600	469.7	0.1404	Yes	No	Increase	Normal	3310	5227	
MW-BAA-2	21/21	0%	-	1790	43360	208.2	0.1668	No	No	Stable	Normal	1060		No
MW-BAA-3	21/21	0%	-	3780	141100	375.7	0.1157	Yes	No	Stable	Normal	2880		No
MW-BAA-7	21/21	0%	-	1990	14070	118.6	0.06618	No	No	Stable	Normal	1450		No

Notes:
¹ Based on background data collected from 08/25/2016 through 09/06/2023.
CCR = coal combustion residual
mg/L = milligrams per liter
SSI = statistically significant increase
SU = standard unit
UPL = upper prediction limit

ATTACHMENT 2
Laboratory Analytical Reports

ATTACHMENT 2-1
March 2024 Semiannual Sampling
Event Laboratory Analytical Report



August 06, 2024

Jake Humphrey
Evergy, Inc.
818 S Kansas Avenue
Topeka, KS 66612

RE: Project: JEC BASA/BAL-Revised Report
Pace Project No.: 60449066

Dear Jake Humphrey:

Enclosed are the analytical results for sample(s) received by the laboratory on March 14, 2024. 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,

Alice Spiller
alice.spiller@pacelabs.com
(913)599-5665
PM Lab Management

Enclosures

cc: Shelly Gomez, Evergy
Laura Hines, Evergy, Inc.
Shannon Hughes, Evergy
Adam Irvin, Evergy
Samantha Kaney, Haley & Aldrich
Nick Williams, Haley Aldrich



REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
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CERTIFICATIONS

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Pace Analytical Services Kansas

9608 Loiret Boulevard, Lenexa, KS 66219

Arkansas Certification #: 88-00679

Illinois Certification #: 2000302023-6

Colorado Division of Oil and Public Safety

Iowa Certification #: 118

Kansas Field Laboratory Certification #: E-92587

Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055

Missouri Inorganic Drinking Water Certification

Nevada Certification #: KS000212024-1

Oklahoma Certification #: 2023-073

Texas Certification #: T104704407-23-17

Utah Certification #: KS000212022-13

REPORT OF LABORATORY ANALYSIS

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SAMPLE SUMMARY

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60449066001	BAA-2-031324	Water	03/13/24 11:40	03/14/24 17:30
60449066002	BAA-3-031324	Water	03/13/24 09:35	03/14/24 17:30
60449066003	BAA-6-031324	Water	03/13/24 10:30	03/14/24 17:30
60449066004	BAA-7-031324	Water	03/13/24 13:35	03/14/24 17:30
60449066005	JEC-BAA-DUP-031324	Water	03/13/24 10:30	03/14/24 17:30

REPORT OF LABORATORY ANALYSIS

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**SAMPLE ANALYTE COUNT**

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60449066001	BAA-2-031324	EPA 200.7	JXD	2	PASI-K
		SM 2540C	KVI	1	PASI-K
		SM 4500-H+B	SR1	1	PASI-K
		EPA 300.0	PL	3	PASI-K
60449066002	BAA-3-031324	EPA 200.7	JXD	2	PASI-K
		SM 2540C	KVI	1	PASI-K
		SM 4500-H+B	SR1	1	PASI-K
		EPA 300.0	PL, RKA	3	PASI-K
60449066003	BAA-6-031324	EPA 200.7	JXD	2	PASI-K
		SM 2540C	KVI	1	PASI-K
		SM 4500-H+B	SR1	1	PASI-K
		EPA 300.0	PL, RKA	3	PASI-K
60449066004	BAA-7-031324	EPA 200.7	JXD	2	PASI-K
		SM 2540C	KVI	1	PASI-K
		SM 4500-H+B	SR1	1	PASI-K
		EPA 300.0	PL	3	PASI-K
60449066005	JEC-BAA-DUP-031324	EPA 200.7	JXD	2	PASI-K
		SM 2540C	KVI	1	PASI-K
		SM 4500-H+B	SR1	1	PASI-K
		EPA 300.0	PL, RKA	3	PASI-K

PASI-K = Pace Analytical Services - Kansas City

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
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PROJECT NARRATIVE

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Date: August 06, 2024

REVISED to include reanalysis data per client request

REV_1 Report amended to include reanalysis data per client request for samples 60449066004 (SO₄, TDS), 60449066001 (Fluoride, TDS), 60449066002 (Fluoride, TDS) 60449066003 (TDS)

REV_3 Report amended to report original TDS results and remove reanalysis results for samples 60449066002 and 60449066003 per client request.

REVISION_2 to remove duplicate results per client request.

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
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PROJECT NARRATIVE

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Method: EPA 200.7

Description: 200.7 Metals, Total

Client: Evergy Kansas Central, Inc.

Date: August 06, 2024

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: 887344

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60449065001,60449066003

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 3512349)
- Calcium

Additional Comments:

REPORT OF LABORATORY ANALYSIS

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PROJECT NARRATIVE

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Method: SM 2540C

Description: 2540C Total Dissolved Solids

Client: Evergy Kansas Central, Inc.

Date: August 06, 2024

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.

QC Batch: 887323

D6: The precision between the sample and sample duplicate exceeded laboratory control limits.

- DUP (Lab ID: 3512246)
- Total Dissolved Solids

Additional Comments:

REPORT OF LABORATORY ANALYSIS

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PROJECT NARRATIVE

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Method: SM 4500-H+B

Description: 4500H+ pH, Electrometric

Client: Evergy Kansas Central, Inc.

Date: August 06, 2024

General Information:

5 samples were analyzed for SM 4500-H+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.

- BAA-2-031324 (Lab ID: 60449066001)
- BAA-3-031324 (Lab ID: 60449066002)
- BAA-6-031324 (Lab ID: 60449066003)
- BAA-7-031324 (Lab ID: 60449066004)
- JEC-BAA-DUP-031324 (Lab ID: 60449066005)

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:

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PROJECT NARRATIVE

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Method: EPA 300.0

Description: 300.0 IC Anions 28 Days

Client: Evergy Kansas Central, Inc.

Date: August 06, 2024

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.

H1: Analysis conducted outside the EPA method holding time.

- BAA-3-031324 (Lab ID: 60449066002)

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: 887337

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60449052001,60449065002

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 3512317)
 - Sulfate

Additional Comments:

Analyte Comments:

QC Batch: 887337

E: Analyte concentration exceeded the calibration range. The reported result is estimated.

- MS (Lab ID: 3512317)
 - Sulfate
- MSD (Lab ID: 3512318)
 - Sulfate

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

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ANALYTICAL RESULTS

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Sample: BAA-2-031324		Lab ID: 60449066001		Collected: 03/13/24 11:40		Received: 03/14/24 17:30		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							
Boron, Total Recoverable		0.89	mg/L	0.10	1	03/20/24 10:30	03/21/24 15:18	7440-42-8	
Calcium, Total Recoverable		161	mg/L	0.20	1	03/20/24 10:30	03/21/24 15:18	7440-70-2	
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City							
Total Dissolved Solids		1060	mg/L	13.3	1		03/20/24 10:37		
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City							
pH at 25 Degrees C		7.2	Std. Units	0.10	1		03/18/24 12:50		H6
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City							
Chloride		129	mg/L	50.0	50		03/21/24 18:01	16887-00-6	
Fluoride		0.29	mg/L	0.20	1		03/21/24 17:49	16984-48-8	
Sulfate		543	mg/L	50.0	50		03/21/24 18:01	14808-79-8	

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ANALYTICAL RESULTS

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Sample: BAA-3-031324		Lab ID: 60449066002		Collected: 03/13/24 09:35		Received: 03/14/24 17:30		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							
Boron, Total Recoverable	2.4	mg/L	0.10	1	03/20/24 10:30	03/21/24 15:20	7440-42-8		
Calcium, Total Recoverable	537	mg/L	0.20	1	03/20/24 10:30	03/21/24 15:20	7440-70-2		
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City							
Total Dissolved Solids	2880	mg/L	66.7	1		03/20/24 10:37			
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City							
pH at 25 Degrees C	7.1	Std. Units	0.10	1		03/18/24 12:41			H6
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City							
Chloride	143	mg/L	50.0	50		04/23/24 13:54	16887-00-6		H1
Fluoride	1.1	mg/L	0.20	1		03/21/24 18:38	16984-48-8		
Sulfate	2020	mg/L	500	500		03/22/24 18:42	14808-79-8		

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ANALYTICAL RESULTS

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Sample: BAA-6-031324		Lab ID: 60449066003		Collected: 03/13/24 10:30		Received: 03/14/24 17:30		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							
Boron, Total Recoverable	3.5	mg/L	0.10	1	03/20/24 10:30	03/21/24 15:22	7440-42-8	M1	
Calcium, Total Recoverable	546	mg/L	0.20	1	03/20/24 10:30	03/21/24 15:22	7440-70-2		
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City							
Total Dissolved Solids	4460	mg/L	100	1		03/20/24 10:37			
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City							
pH at 25 Degrees C	7.1	Std. Units	0.10	1		03/18/24 12:45		H6	
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City							
Chloride	268	mg/L	50.0	50		03/21/24 19:15	16887-00-6		
Fluoride	0.86	mg/L	0.20	1		03/21/24 19:03	16984-48-8		
Sulfate	1840	mg/L	500	500		03/22/24 18:55	14808-79-8		

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ANALYTICAL RESULTS

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Sample: BAA-7-031324		Lab ID: 60449066004		Collected: 03/13/24 13:35		Received: 03/14/24 17:30		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							
Boron, Total Recoverable	0.68	mg/L	0.10	1	03/20/24 10:30	03/21/24 15:27	7440-42-8		
Calcium, Total Recoverable	265	mg/L	0.20	1	03/20/24 10:30	03/21/24 15:27	7440-70-2		
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City							
Total Dissolved Solids	1510	mg/L	40.0	1		03/20/24 10:40			
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City							
pH at 25 Degrees C	7.2	Std. Units	0.10	1		03/19/24 10:02		H6	
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City							
Chloride	156	mg/L	50.0	50		03/21/24 19:40	16887-00-6		
Fluoride	<0.20	mg/L	0.20	1		03/21/24 19:27	16984-48-8		
Sulfate	991	mg/L	50.0	50		03/21/24 19:40	14808-79-8		

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ANALYTICAL RESULTS

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Sample: JEC-BAA-DUP-031324		Lab ID: 60449066005		Collected: 03/13/24 10:30		Received: 03/14/24 17:30		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							
Boron, Total Recoverable	3.5	mg/L	0.10	1	03/20/24 10:30	03/21/24 15:29	7440-42-8		
Calcium, Total Recoverable	533	mg/L	0.20	1	03/20/24 10:30	03/21/24 15:29	7440-70-2		
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City							
Total Dissolved Solids	2730	mg/L	66.7	1		03/20/24 10:40			
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City							
pH at 25 Degrees C	7.0	Std. Units	0.10	1		03/18/24 12:46		H6	
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City							
Chloride	277	mg/L	50.0	50		03/21/24 20:05	16887-00-6		
Fluoride	0.84	mg/L	0.20	1		03/21/24 19:52	16984-48-8		
Sulfate	1990	mg/L	500	500		03/22/24 19:08	14808-79-8		

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QUALITY CONTROL DATA

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

QC Batch:	887344	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: 60449066001, 60449066002, 60449066003, 60449066004, 60449066005			

METHOD BLANK: 3512345

Matrix: Water

Associated Lab Samples: 60449066001, 60449066002, 60449066003, 60449066004, 60449066005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Boron	mg/L	<0.10	0.10	03/21/24 14:45	
Calcium	mg/L	<0.20	0.20	03/21/24 14:45	

LABORATORY CONTROL SAMPLE: 3512346

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Boron	mg/L	1	0.95	95	85-115	
Calcium	mg/L	10	10.0	100	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3512347 3512348

Parameter	Units	60449065001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Boron	mg/L	0.10	1	1	1.1	1.1	99	98	70-130	2	20	
Calcium	mg/L	104	10	10	113	111	99	73	70-130	2	20	

MATRIX SPIKE SAMPLE: 3512349

Parameter	Units	60449066003 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Boron	mg/L	3.5	1	4.6	102	70-130	
Calcium	mg/L	546	10	549	38	70-130 M1	

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QUALITY CONTROL DATA

Project: JEC BASA/BAL-Revised Report
Pace Project No.: 60449066

QC Batch: 887323 Analysis Method: SM 2540C
QC Batch Method: SM 2540C Analysis Description: 2540C Total Dissolved Solids
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60449066001, 60449066002, 60449066003

METHOD BLANK: 3512243 Matrix: Water
Associated Lab Samples: 60449066001, 60449066002, 60449066003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	<5.0	5.0	03/20/24 10:34	

LABORATORY CONTROL SAMPLE: 3512244

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	2000	1860	93	80-120	

SAMPLE DUPLICATE: 3512245

Parameter	Units	60448961001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	ND	<5.0		10	

SAMPLE DUPLICATE: 3512246

Parameter	Units	60449062003 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	3250	3670	12	10	D6

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QUALITY CONTROL DATA

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

QC Batch: 887325

Analysis Method: SM 2540C

QC Batch Method: SM 2540C

Analysis Description: 2540C Total Dissolved Solids

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60449066004, 60449066005

METHOD BLANK: 3512256

Matrix: Water

Associated Lab Samples: 60449066004, 60449066005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	<5.0	5.0	03/20/24 10:40	

LABORATORY CONTROL SAMPLE: 3512257

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	2000	1890	94	80-120	

SAMPLE DUPLICATE: 3512258

Parameter	Units	60449066004 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	1510	1510	0	10	

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QUALITY CONTROL DATA

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

QC Batch: 886942

Analysis Method: SM 4500-H+B

QC Batch Method: SM 4500-H+B

Analysis Description: 4500H+B pH

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60449066001, 60449066002, 60449066003, 60449066005

SAMPLE DUPLICATE: 3511036

Parameter	Units	60449101001 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	8.5	8.6	1	5	H6

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QUALITY CONTROL DATA

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

QC Batch: 887127

Analysis Method: SM 4500-H+B

QC Batch Method: SM 4500-H+B

Analysis Description: 4500H+B pH

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60449066004

SAMPLE DUPLICATE: 3511675

Parameter	Units	60449064001 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	6.9	7.1	2	5	H6

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QUALITY CONTROL DATA

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

QC Batch: 887337 Analysis Method: EPA 300.0
QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60449066001, 60449066002, 60449066003, 60449066004, 60449066005

METHOD BLANK: 3512315 Matrix: Water
Associated Lab Samples: 60449066001, 60449066002, 60449066003, 60449066004, 60449066005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	03/21/24 08:46	
Fluoride	mg/L	<0.20	0.20	03/21/24 08:46	
Sulfate	mg/L	<1.0	1.0	03/21/24 08:46	

LABORATORY CONTROL SAMPLE: 3512316

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.7	94	90-110	
Fluoride	mg/L	2.5	2.4	97	90-110	
Sulfate	mg/L	5	4.9	98	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3512317 3512318

Parameter	Units	60449052001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chloride	mg/L	170	250	250	427	398	103	91	80-120	7	15	
Fluoride	mg/L	<0.20	2.5	2.5	2.6	2.6	101	100	80-120	1	15	
Sulfate	mg/L	874	250	250	1200	1120	129	100	80-120	6	15	E,M1

MATRIX SPIKE SAMPLE: 3512319

Parameter	Units	60449065002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	78.4	250	323	98	80-120	
Fluoride	mg/L	<0.20	2.5	2.1	82	80-120	
Sulfate	mg/L	332	250	601	107	80-120	

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QUALITY CONTROL DATA

Project: JEC BASA/BAL-Revised Report
Pace Project No.: 60449066

QC Batch:	891537	Analysis Method:	EPA 300.0
QC Batch Method:	EPA 300.0	Analysis Description:	300.0 IC Anions
		Laboratory:	Pace Analytical Services - Kansas City

Associated Lab Samples: 60449066002

METHOD BLANK: 3528658 Matrix: Water
Associated Lab Samples: 60449066002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	04/23/24 10:31	

LABORATORY CONTROL SAMPLE: 3528659

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.8	97	90-110	

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QUALIFIERS

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

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.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

ANALYTE QUALIFIERS

D6 The precision between the sample and sample duplicate exceeded laboratory control limits.

E Analyte concentration exceeded the calibration range. The reported result is estimated.

H1 Analysis conducted outside the EPA method holding time.

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

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC BASA/BAL-Revised Report

Pace Project No.: 60449066

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60449066001	BAA-2-031324	EPA 200.7	887344	EPA 200.7	887419
60449066002	BAA-3-031324	EPA 200.7	887344	EPA 200.7	887419
60449066003	BAA-6-031324	EPA 200.7	887344	EPA 200.7	887419
60449066004	BAA-7-031324	EPA 200.7	887344	EPA 200.7	887419
60449066005	JEC-BAA-DUP-031324	EPA 200.7	887344	EPA 200.7	887419
60449066001	BAA-2-031324	SM 2540C	887323		
60449066002	BAA-3-031324	SM 2540C	887323		
60449066003	BAA-6-031324	SM 2540C	887323		
60449066004	BAA-7-031324	SM 2540C	887325		
60449066005	JEC-BAA-DUP-031324	SM 2540C	887325		
60449066001	BAA-2-031324	SM 4500-H+B	886942		
60449066002	BAA-3-031324	SM 4500-H+B	886942		
60449066003	BAA-6-031324	SM 4500-H+B	886942		
60449066004	BAA-7-031324	SM 4500-H+B	887127		
60449066005	JEC-BAA-DUP-031324	SM 4500-H+B	886942		
60449066001	BAA-2-031324	EPA 300.0	887337		
60449066002	BAA-3-031324	EPA 300.0	887337		
60449066002	BAA-3-031324	EPA 300.0	891537		
60449066003	BAA-6-031324	EPA 300.0	887337		
60449066004	BAA-7-031324	EPA 300.0	887337		
60449066005	JEC-BAA-DUP-031324	EPA 300.0	887337		

REPORT OF LABORATORY ANALYSIS

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WO# : 60449066



DC#_Title: ENV-FRM-LENE-0009_Sar

Revision: 2

Effective Date: 01/12/2022

Issued By: Lenexa

Client Name: Energ

Courier: FedEx ☐ UPS ☐ VIA ☐ Clay ☐ PEX ☐ ECI ☐ Pace ☐ Xroads ☐ Client ☒ Other ☐

Tracking #: _____ Pace Shipping Label Used? Yes ☐ No ☒

Custody Seal on Cooler/Box Present: Yes ☒ No ☐ Seals intact: Yes ☒ No ☐

Packing Material: Bubble Wrap ☐ Bubble Bags ☐ Foam ☐ None ☐ Other ☒ ZPC

Thermometer Used: T298 Type of Ice: Wet Blue ☐ None ☐

Cooler Temperature (°C): As-read 2.7 Corr. Factor -0.3 Corrected 2.4

Date and initials of person examining contents: 03.15.2024 2

Temperature should be above freezing to 6°C

Chain of Custody present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Chain of Custody relinquished:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples arrived within holding time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Short Hold Time analyses (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Rush Turn Around Time requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Sufficient volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Correct containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Pace containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Filtered volume received for dissolved tests?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Sample labels match COC: Date / time / ID / analyses	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples contain multiple phases? Matrix: <u>wt</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Containers requiring pH preservation in compliance? (HNO ₃ , H ₂ SO ₄ , HCl<2; NaOH>9 Sulfide, NaOH>10 Cyanide) (Exceptions: VOA, Micro, O&G, KS TPH, OK-DRO)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	List sample IDs, volumes, lot #'s of preservative and the date/time added.
Cyanide water sample checks:		
Lead acetate strip turns dark? (Record only)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Potassium iodide test strip turns blue/purple? (Preserve)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Trip Blank present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Headspace in VOA vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Samples from USDA Regulated Area: State:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Additional labels attached to 5035A / TX1005 vials in the field?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

Client Notification/ Resolution:

Copy COC to Client? Y / N

Field Data Required? Y / N

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: _____

Date: _____

ENV-FRM-CORQ-0019_v02_110123 ©



May 22, 2024

Jake Humphrey
Evergy, Inc.
818 S Kansas Avenue
Topeka, KS 66612

RE: Project: JEC BASA/BAL
Pace Project No.: 60453067

Dear Jake Humphrey:

Enclosed are the analytical results for sample(s) received by the laboratory on May 16, 2024. 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,

Alice Spiller
alice.spiller@pacelabs.com
(913)599-5665
PM Lab Management

Enclosures

cc: Shelly Gomez, Evergy
Laura Hines, Evergy, Inc.
Shannon Hughes, Evergy
Adam Irvin, Evergy
Samantha Kaney, Haley & Aldrich
Andrew Watson, Haley & Aldrich



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: JEC BASA/BAL

Pace Project No.: 60453067

Pace Analytical Services Kansas

9608 Loiret Boulevard, Lenexa, KS 66219

Arkansas Inorganic Drinking Water Certification

Arkansas Certification #: 88-00679

Illinois Certification #: 2000302023-6

Colorado Division of Oil and Public Safety

Iowa Certification #: 118

Kansas Field Laboratory Certification #: E-92587

Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055

Missouri Inorganic Drinking Water Certification

Nevada Certification #: KS000212024-1

Oklahoma Certification #: 2023-073

Texas Certification #: T104704407-23-17

Utah Certification #: KS000212022-13

REPORT OF LABORATORY ANALYSIS

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SAMPLE SUMMARY

Project: JEC BASA/BAL

Pace Project No.: 60453067

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60453067001	BAA-6	Water	05/14/24 12:15	05/16/24 10:15
60453067002	BAA-7	Water	05/14/24 11:35	05/16/24 10:15

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: JEC BASA/BAL

Pace Project No.: 60453067

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60453067001	BAA-6	SM 2540C	KVI	1	PASI-K
60453067002	BAA-7	SM 2540C	KVI	1	PASI-K

PASI-K = Pace Analytical Services - Kansas City

REPORT OF LABORATORY ANALYSIS

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PROJECT NARRATIVE

Project: JEC BASA/BAL

Pace Project No.: 60453067

Method: SM 2540C

Description: 2540C Total Dissolved Solids

Client: Evergy Kansas Central, Inc.

Date: May 22, 2024

General Information:

2 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:

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

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: JEC BASA/BAL

Pace Project No.: 60453067

Sample: BAA-6		Lab ID: 60453067001		Collected: 05/14/24 12:15		Received: 05/16/24 10:15		Matrix: Water	
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual	
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City							
Total Dissolved Solids	3310	mg/L	66.7	1		05/20/24 10:40			

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ANALYTICAL RESULTS

Project: JEC BASA/BAL

Pace Project No.: 60453067

Sample: BAA-7		Lab ID: 60453067002		Collected: 05/14/24 11:35		Received: 05/16/24 10:15		Matrix: Water	
Parameters		Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City							
Total Dissolved Solids	1450	mg/L	40.0	1		05/20/24 10:40			

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: JEC BASA/BAL

Pace Project No.: 60453067

QC Batch: 895067

Analysis Method: SM 2540C

QC Batch Method: SM 2540C

Analysis Description: 2540C Total Dissolved Solids

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60453067001, 60453067002

METHOD BLANK: 3542516

Matrix: Water

Associated Lab Samples: 60453067001, 60453067002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	<5.0	5.0	05/20/24 10:39	

LABORATORY CONTROL SAMPLE: 3542517

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	1000	900	90	80-120	

SAMPLE DUPLICATE: 3542518

Parameter	Units	60452946003 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	868	848	2	10	

SAMPLE DUPLICATE: 3542519

Parameter	Units	60453166004 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	657	652	1	10	

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

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QUALIFIERS

Project: JEC BASA/BAL

Pace Project No.: 60453067

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.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

REPORT OF LABORATORY ANALYSIS

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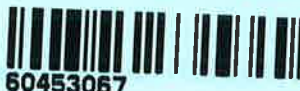
QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC BASA/BAL
Pace Project No.: 60453067

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60453067001	BAA-6	SM 2540C	895067		
60453067002	BAA-7	SM 2540C	895067		

REPORT OF LABORATORY ANALYSIS

WO#: 60453067



DC#_Title: ENV-FRM-LENE-0009_Sample C

Revision: 2

Effective Date: 01/12/2022

Issued By: Lenexa

Client Name: Energy Kansas Central

Courier: FedEx ☐ UPS ☐ VIA ☐ Clay ☐ PEX ☐ ECI ☐ Pace ☐ Xroads ☐ Client ☒ Other ☐

Tracking #: _____ Pace Shipping Label Used? Yes ☐ No ☒

Custody Seal on Cooler/Box Present: Yes ☒ No ☐ Seals intact: Yes ☒ No ☐

Packing Material: Bubble Wrap ☐ Bubble Bags ☐ Foam ☐ None ☒ Other ☐

Thermometer Used: T2N 01 Type of Ice: Wet Blue ☐ None ☐

Cooler Temperature (°C): As-read 1.8 Corr. Factor 0.0 Corrected 1.8

Date and initials of person examining contents:

Temperature should be above freezing to 6°C

Chain of Custody present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Chain of Custody relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples arrived within holding time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Short Hold Time analyses (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Rush Turn Around Time requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Sufficient volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Correct containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Pace containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Filtered volume received for dissolved tests?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Sample labels match COC: Date / time / ID / analyses	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples contain multiple phases? Matrix: <u>W</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Containers requiring pH preservation in compliance? (HNO ₃ , H ₂ SO ₄ , HCl<2; NaOH>9 Sulfide, NaOH>10 Cyanide) (Exceptions: VOA, Micro, O&G, KS TPH, OK-DRO) LOT#:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	List sample IDs, volumes, lot #'s of preservative and the date/time added.
Cyanide water sample checks:		
Lead acetate strip turns dark? (Record only)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Potassium iodide test strip turns blue/purple? (Preserve)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Trip Blank present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Headspace in VOA vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Samples from USDA Regulated Area: State:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Additional labels attached to 5035A / TX1005 vials in the field?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

Client Notification/ Resolution:

Copy COC to Client? Y / N

Field Data Required? Y / N

Person Contacted: _____

Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: _____

Date: _____

ATTACHMENT 2-2
September 2024 Annual Assessment
Sampling Event Laboratory Analytical Report



September 19, 2024

Jake Humphrey
Evergy, Inc.
818 S Kansas Avenue
Topeka, KS 66612

RE: Project: JEC BASA/BAL
Pace Project No.: 60459928

Dear Jake Humphrey:

Enclosed are the analytical results for sample(s) received by the laboratory on September 05, 2024. 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 - Salina

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

Sincerely,

Alice Spiller
alice.spiller@pacelabs.com
(913)599-5665
PM Lab Management

Enclosures

cc: Samantha Kaney, Haley & Aldrich
Nick Williams, Haley Aldrich



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: JEC BASA/BAL

Pace Project No.: 60459928

Pace Analytical Services Kansas

9608 Loiret Boulevard, Lenexa, KS 66219

Arkansas Certification #: 88-00679

Colorado Division of Oil and Public Safety

Illinois Certification #: 2000302023-6

Iowa Certification #: 118

Kansas Field Laboratory Certification #: E-92587

Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055

Missouri Inorganic Drinking Water Certification

Nevada Certification #: KS000212024-1

Oklahoma Certification #: 2023-073

Texas Certification #: T104704407-23-17

Utah Certification #: KS000212022-13

Pace Analytical Services Salina

528 N 9th Street, Salina, KS 67401

Kansas/NELAP Certification: # E-10146

Oklahoma Certification: 2023-074

Texas Certification: T104704246-23-15

REPORT OF LABORATORY ANALYSIS

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SAMPLE SUMMARY

Project: JEC BASA/BAL

Pace Project No.: 60459928

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60459928001	BAA-2-090424	Water	09/04/24 09:15	09/05/24 12:50
60459928002	BAA-3-090424	Water	09/04/24 11:25	09/05/24 12:50
60459928003	BAA-6-090424	Water	09/04/24 10:35	09/05/24 12:50
60459928004	BAA-7-090424	Water	09/04/24 09:50	09/05/24 12:50
60459928005	JEC-BAA-DUP-090424	Water	09/04/24 09:10	09/05/24 12:50

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: JEC BASA/BAL

Pace Project No.: 60459928

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60459928001	BAA-2-090424	EPA 200.7	ARMN	2	PASI-K
		EPA 300.0	MLL	3	PASI-SA
		SM 2540C	TML	1	PASI-K
		SM 4500-H+B	TML	1	PASI-K
60459928002	BAA-3-090424	EPA 200.7	ARMN	2	PASI-K
		EPA 300.0	MLL	3	PASI-SA
		SM 2540C	TML	1	PASI-K
		SM 4500-H+B	TML	1	PASI-K
60459928003	BAA-6-090424	EPA 200.7	ARMN	2	PASI-K
		EPA 300.0	MLL	3	PASI-SA
		SM 2540C	TML	1	PASI-K
		SM 4500-H+B	TML	1	PASI-K
60459928004	BAA-7-090424	EPA 200.7	ARMN	2	PASI-K
		EPA 300.0	MLL	3	PASI-SA
		SM 2540C	TML	1	PASI-K
		SM 4500-H+B	TML	1	PASI-K
60459928005	JEC-BAA-DUP-090424	EPA 200.7	ARMN	2	PASI-K
		EPA 300.0	MLL	3	PASI-SA
		SM 2540C	TML	1	PASI-K
		SM 4500-H+B	TML	1	PASI-K

PASI-K = Pace Analytical Services - Kansas City

PASI-SA = Pace Analytical Services - Salina

REPORT OF LABORATORY ANALYSIS

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PROJECT NARRATIVE

Project: JEC BASA/BAL

Pace Project No.: 60459928

Method: EPA 200.7

Description: 200.7 Metals, Total

Client: Evergy_Haley & Aldrich

Date: September 19, 2024

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: 907702

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 60459928004,60459957004

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 3592655)
 - Calcium
- MS (Lab ID: 3592663)
 - Calcium

Additional Comments:

REPORT OF LABORATORY ANALYSIS

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PROJECT NARRATIVE

Project: JEC BASA/BAL

Pace Project No.: 60459928

Method: EPA 300.0

Description: 300.0 IC Anions 28 Days

Client: Evergy_Haley & Aldrich

Date: September 19, 2024

General Information:

5 samples were analyzed for EPA 300.0 by Pace Analytical Services Salina. 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.

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.

Surrogates:

All surrogates 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

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PROJECT NARRATIVE

Project: JEC BASA/BAL

Pace Project No.: 60459928

Method: SM 2540C

Description: 2540C Total Dissolved Solids

Client: Evergy_Haley & Aldrich

Date: September 19, 2024

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:

REPORT OF LABORATORY ANALYSIS

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PROJECT NARRATIVE

Project: JEC BASA/BAL

Pace Project No.: 60459928

Method: SM 4500-H+B

Description: 4500H+ pH, Electrometric

Client: Evergy_Haley & Aldrich

Date: September 19, 2024

General Information:

5 samples were analyzed for SM 4500-H+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.

- BAA-2-090424 (Lab ID: 60459928001)
- BAA-3-090424 (Lab ID: 60459928002)
- BAA-6-090424 (Lab ID: 60459928003)
- BAA-7-090424 (Lab ID: 60459928004)
- JEC-BAA-DUP-090424 (Lab ID: 60459928005)

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

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ANALYTICAL RESULTS

Project: JEC BASA/BAL

Pace Project No.: 60459928

Sample: BAA-2-090424		Lab ID: 60459928001	Collected: 09/04/24 09:15		Received: 09/05/24 12:50		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						
Boron, Total Recoverable	0.79	mg/L	0.10	1	09/06/24 14:17	09/11/24 11:30	7440-42-8	
Calcium, Total Recoverable	154	mg/L	0.20	1	09/06/24 14:17	09/11/24 11:30	7440-70-2	
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Salina						
Chloride	107	mg/L	10.0	10		09/12/24 00:11	16887-00-6	
Fluoride	0.49	mg/L	0.10	1		09/11/24 13:12	16984-48-8	
Sulfate	491	mg/L	50.0	50		09/12/24 00:26	14808-79-8	
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	1090	mg/L	20.0	1		09/06/24 10:17		
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City						
pH at 25 Degrees C	7.3	Std. Units	0.10	1		09/09/24 16:55		H6

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ANALYTICAL RESULTS

Project: JEC BASA/BAL

Pace Project No.: 60459928

Sample: BAA-3-090424		Lab ID: 60459928002	Collected: 09/04/24 11:25		Received: 09/05/24 12:50		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						
Boron, Total Recoverable	2.3	mg/L	0.10	1	09/06/24 14:17	09/11/24 11:32	7440-42-8	
Calcium, Total Recoverable	510	mg/L	0.20	1	09/06/24 14:17	09/11/24 11:32	7440-70-2	
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Salina						
Chloride	74.9	mg/L	10.0	10		09/12/24 00:40	16887-00-6	
Fluoride	1.0	mg/L	0.10	1		09/11/24 13:27	16984-48-8	
Sulfate	1950	mg/L	200	200		09/12/24 00:55	14808-79-8	
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	3220	mg/L	100	1		09/06/24 10:17		
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City						
pH at 25 Degrees C	7.0	Std. Units	0.10	1		09/10/24 17:15		H6

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ANALYTICAL RESULTS

Project: JEC BASA/BAL

Pace Project No.: 60459928

Sample: BAA-6-090424		Lab ID: 60459928003	Collected: 09/04/24 10:35		Received: 09/05/24 12:50		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						
Boron, Total Recoverable	5.9	mg/L	0.10	1	09/06/24 14:17	09/11/24 11:34	7440-42-8	
Calcium, Total Recoverable	503	mg/L	0.20	1	09/06/24 14:17	09/11/24 11:34	7440-70-2	
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Salina						
Chloride	284	mg/L	50.0	50		09/12/24 01:10	16887-00-6	
Fluoride	0.72	mg/L	0.10	1		09/11/24 13:42	16984-48-8	
Sulfate	1980	mg/L	200	200		09/12/24 01:24	14808-79-8	
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	3780	mg/L	125	1		09/06/24 10:17		
4500H+ 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		09/10/24 17:07		H6

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ANALYTICAL RESULTS

Project: JEC BASA/BAL

Pace Project No.: 60459928

Sample: BAA-7-090424		Lab ID: 60459928004	Collected: 09/04/24 09:50		Received: 09/05/24 12:50		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						
Boron, Total Recoverable	0.64	mg/L	0.10	1	09/06/24 15:06	09/18/24 12:07	7440-42-8	
Calcium, Total Recoverable	255	mg/L	0.20	1	09/06/24 15:06	09/18/24 12:07	7440-70-2	M1,P6
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Salina						
Chloride	149	mg/L	20.0	20		09/12/24 02:08	16887-00-6	
Fluoride	0.52	mg/L	0.10	1		09/11/24 14:26	16984-48-8	
Sulfate	897	mg/L	100	100		09/12/24 02:23	14808-79-8	
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	1730	mg/L	66.7	1		09/06/24 10:17		
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City						
pH at 25 Degrees C	7.2	Std. Units	0.10	1		09/09/24 16:59		H6

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ANALYTICAL RESULTS

Project: JEC BASA/BAL

Pace Project No.: 60459928

Sample: JEC-BAA-DUP-090424		Lab ID: 60459928005	Collected: 09/04/24 09:10		Received: 09/05/24 12:50		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						
Boron, Total Recoverable	0.78	mg/L	0.10	1	09/06/24 15:06	09/18/24 12:12	7440-42-8	
Calcium, Total Recoverable	157	mg/L	0.20	1	09/06/24 15:06	09/18/24 12:12	7440-70-2	
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Salina						
Chloride	106	mg/L	10.0	10		09/12/24 02:38	16887-00-6	
Fluoride	0.50	mg/L	0.10	1		09/11/24 14:40	16984-48-8	
Sulfate	492	mg/L	50.0	50		09/12/24 02:52	14808-79-8	
2540C Total Dissolved Solids		Analytical Method: SM 2540C Pace Analytical Services - Kansas City						
Total Dissolved Solids	1120	mg/L	20.0	1		09/06/24 10:17		
4500H+ pH, Electrometric		Analytical Method: SM 4500-H+B Pace Analytical Services - Kansas City						
pH at 25 Degrees C	7.4	Std. Units	0.10	1		09/09/24 16:53		H6

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QUALITY CONTROL DATA

Project: JEC BASA/BAL

Pace Project No.: 60459928

QC Batch: 907701

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: 60459928001, 60459928002, 60459928003

METHOD BLANK: 3592646

Matrix: Water

Associated Lab Samples: 60459928001, 60459928002, 60459928003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Boron	mg/L	<0.10	0.10	09/11/24 11:41	
Calcium	mg/L	<0.20	0.20	09/11/24 11:41	

LABORATORY CONTROL SAMPLE: 3592647

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Boron	mg/L	1	0.94	94	85-115	
Calcium	mg/L	10	10.8	108	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3592648 3592649

Parameter	Units	60460004001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Boron	mg/L	448 ug/L	1	1	1.4	1.4	94	93	70-130	1	20	
Calcium	mg/L	12700 ug/L	10	10	22.8	22.8	101	102	70-130	0	20	

MATRIX SPIKE SAMPLE: 3592650

Parameter	Units	60459912002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Boron	mg/L	0.51	1	1.5	95	70-130	
Calcium	mg/L	189	10	199	106	70-130	

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QUALITY CONTROL DATA

Project: JEC BASA/BAL

Pace Project No.: 60459928

QC Batch: 907702

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: 60459928004, 60459928005

METHOD BLANK: 3592651

Matrix: Water

Associated Lab Samples: 60459928004, 60459928005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Boron	mg/L	<0.10	0.10	09/18/24 12:04	
Calcium	mg/L	<0.20	0.20	09/18/24 12:04	

LABORATORY CONTROL SAMPLE: 3592652

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Boron	mg/L	1	0.90	90	85-115	
Calcium	mg/L	10	10.1	101	85-115	

MATRIX SPIKE SAMPLE: 3592655

Parameter	Units	60459957004 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Boron	mg/L	0.20	1	1.2	96	70-130	
Calcium	mg/L	231	10	254	223	70-130 M1	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3592663 3592664

Parameter	Units	60459928004 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Boron	mg/L	0.64	1	1	1.6	1.6	99	91	70-130	5	20	
Calcium	mg/L	255	10	10	283	263	288	80	70-130	8	20 M1	

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QUALITY CONTROL DATA

Project: JEC BASA/BAL

Pace Project No.: 60459928

QC Batch: 907950 Analysis Method: EPA 300.0
QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions
Laboratory: Pace Analytical Services - Salina
Associated Lab Samples: 60459928001, 60459928002, 60459928003, 60459928004, 60459928005

METHOD BLANK: 3593427 Matrix: Water
Associated Lab Samples: 60459928001, 60459928002, 60459928003, 60459928004, 60459928005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	09/11/24 08:11	
Fluoride	mg/L	<0.10	0.10	09/11/24 08:11	
Sulfate	mg/L	<1.0	1.0	09/11/24 08:11	

LABORATORY CONTROL SAMPLE: 3593428

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	4.9	98	90-110	
Fluoride	mg/L	2.5	2.6	102	90-110	
Sulfate	mg/L	5	5.1	101	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3593429 3593430

Parameter	Units	60459912001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chloride	mg/L	175	100	100	282	281	107	106	80-120	0	15	
Fluoride	mg/L	0.30	2.5	2.5	2.7	2.7	96	96	80-120	0	15	
Sulfate	mg/L	880	500	500	1360	1380	97	99	80-120	1	15	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3593431 3593432

Parameter	Units	60459957004 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chloride	mg/L	66.0	50	50	119	120	106	108	80-120	1	15	
Fluoride	mg/L	0.33	2.5	2.5	2.7	2.7	95	95	80-120	0	15	
Sulfate	mg/L	592	500	500	1110	1100	104	102	80-120	1	15	

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QUALITY CONTROL DATA

Project: JEC BASA/BAL

Pace Project No.: 60459928

QC Batch: 907636

Analysis Method: SM 2540C

QC Batch Method: SM 2540C

Analysis Description: 2540C Total Dissolved Solids

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60459928001, 60459928002, 60459928003, 60459928004, 60459928005

METHOD BLANK: 3592254

Matrix: Water

Associated Lab Samples: 60459928001, 60459928002, 60459928003, 60459928004, 60459928005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	<5.0	5.0	09/06/24 10:14	

LABORATORY CONTROL SAMPLE: 3592255

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	1000	981	98	80-120	

SAMPLE DUPLICATE: 3592256

Parameter	Units	60459722004 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	844	888	5	10	

SAMPLE DUPLICATE: 3592257

Parameter	Units	60459922004 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	624	633	1	10	

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QUALITY CONTROL DATA

Project: JEC BASA/BAL

Pace Project No.: 60459928

QC Batch: 907853

Analysis Method: SM 4500-H+B

QC Batch Method: SM 4500-H+B

Analysis Description: 4500H+B pH

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60459928001, 60459928004, 60459928005

SAMPLE DUPLICATE: 3593189

Parameter	Units	60459942001 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	8.3	8.3	0	5	H6

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QUALITY CONTROL DATA

Project: JEC BASA/BAL
Pace Project No.: 60459928

QC Batch:	907980	Analysis Method:	SM 4500-H+B
QC Batch Method:	SM 4500-H+B	Analysis Description:	4500H+B pH
		Laboratory:	Pace Analytical Services - Kansas City
Associated Lab Samples: 60459928002, 60459928003			

SAMPLE DUPLICATE: 3593536

Parameter	Units	60459928003 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	6.8	6.8	1	5	H6

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



QUALIFIERS

Project: JEC BASA/BAL

Pace Project No.: 60459928

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.

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.

P6 Matrix spike recovery was outside laboratory control limits due to a parent sample concentration notably higher than the spike level.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC BASA/BAL

Pace Project No.: 60459928

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60459928001	BAA-2-090424	EPA 200.7	907701	EPA 200.7	907728
60459928002	BAA-3-090424	EPA 200.7	907701	EPA 200.7	907728
60459928003	BAA-6-090424	EPA 200.7	907701	EPA 200.7	907728
60459928004	BAA-7-090424	EPA 200.7	907702	EPA 200.7	907742
60459928005	JEC-BAA-DUP-090424	EPA 200.7	907702	EPA 200.7	907742
60459928001	BAA-2-090424	EPA 300.0	907950		
60459928002	BAA-3-090424	EPA 300.0	907950		
60459928003	BAA-6-090424	EPA 300.0	907950		
60459928004	BAA-7-090424	EPA 300.0	907950		
60459928005	JEC-BAA-DUP-090424	EPA 300.0	907950		
60459928001	BAA-2-090424	SM 2540C	907636		
60459928002	BAA-3-090424	SM 2540C	907636		
60459928003	BAA-6-090424	SM 2540C	907636		
60459928004	BAA-7-090424	SM 2540C	907636		
60459928005	JEC-BAA-DUP-090424	SM 2540C	907636		
60459928001	BAA-2-090424	SM 4500-H+B	907853		
60459928002	BAA-3-090424	SM 4500-H+B	907980		
60459928003	BAA-6-090424	SM 4500-H+B	907980		
60459928004	BAA-7-090424	SM 4500-H+B	907853		
60459928005	JEC-BAA-DUP-090424	SM 4500-H+B	907853		

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DC#_Title: ENV-FRM-LENE-0009_Sample

Revision: 2

Effective Date: 01/12/202

WO#: 60459928



60459928

Client Name: Evergy Kansas Central, Inc.Courier: FedEx ☐ UPS ☐ VIA ☐ Clay ☐ PEX ☐ ECI ☐ Pace ☐ Xroads ☐ Client ☒ Other ☐Tracking #: _____ Pace Shipping Label Used? Yes ☐ No ☒Custody Seal on Cooler/Box Present: Yes ☐ No ☒ Seals intact: Yes ☐ No ☐Packing Material: Bubble Wrap ☐ Bubble Bags ☐ Foam ☐ None ☐ Other ☒ repleThermometer Used: T298 Type of Ice: Wet Blue ☐ None ☐Cooler Temperature (°C): As-read 3-5 Corr. Factor -0.1 Corrected 3-4Date and initials of person examining contents: 9/15/24

Temperature should be above freezing to 6°C

Chain of Custody present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Chain of Custody relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples arrived within holding time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Short Hold Time analyses (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Rush Turn Around Time requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Sufficient volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Correct containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Pace containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Filtered volume received for dissolved tests?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Sample labels match COC: Date / time / ID / analyses	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples contain multiple phases? Matrix: <u>WT</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Containers requiring pH preservation in compliance? (HNO ₃ , H ₂ SO ₄ , HCl<2; NaOH>9 Sulfide, NaOH>10 Cyanide) (Exceptions: VOA, Micro, O&G, KS TPH, OK-DRO) LOT#:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	List sample IDs, volumes, lot #'s of preservative and the date/time added.
Cyanide water sample checks:		
Lead acetate strip turns dark? (Record only)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Potassium iodide test strip turns blue/purple? (Preserve)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Trip Blank present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Headspace in VOA vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Samples from USDA Regulated Area: State:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Additional labels attached to 5035A / TX1005 vials in the field?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

Client Notification/ Resolution:

Copy COC to Client? Y / N

Field Data Required? Y / N

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: _____

Date: _____

Client: Energy Kansas Central, Inc.

Profile/EZ # 16500 EZ:3/50822

Site: JEC BASA/BAL

Notes

COC Line Item	Matrix	VG9H	DG9H	DG9Q	VG9U	DG9U	DG9M	DG9B	BG1U	AG1H	AG1U	AG2U	AG3S	AG4U	AG5U	JGFU	WGKU	WGDU	BP1U	BP2U	BP3U	BP1N	BP3N	BP3F	BP3S	BP3B	BP3Z	WPDU	ZPLC	Other			
1																																	
2																																	
3																																	
4																																	
5																																	
6																																	
7																																	
8																																	
9																																	
10																																	
11																																	
12																																	

Container Codes

Glass				Plastic		Misc.	
DG9B	40mL bisulfate clear vial	WGKU	8oz clear soil jar	BP1B	1L NaOH plastic	I	Wipe/Swab
DG9H	40mL HCl amber vial	WGFU	4oz clear soil jar	BP1N	1L HNO3 plastic	SP5T	120mL Coliform Na Thiosulfate
DG9M	40mL MeOH clear vial	WG2U	2oz clear soil jar	BP1S	1L H2SO4 plastic	ZPLC	Ziploc Bag
DG9Q	40mL TSP amber vial	JGFU	4oz unpreserved amber wide	BP1U	1L unpreserved plastic	AF	Air Filter
DG9S	40mL H2SO4 amber vial	AG0U	100mL unres amber glass	BP1Z	1L NaOH, Zn Acetate	C	Air Cassettes
DG9T	40mL Na Thio amber vial	AG1H	1L HCl amber glass	BP2B	500mL NaOH plastic	R	Terracore Kit
DG9U	40mL amber unpreserved	AG1S	1L H2SO4 amber glass	BP2N	500mL HNO3 plastic	U	Summa Can
VG9H	40mL HCl clear vial	AG1T	1L Na Thiosulfate clear/amber glass	BP2S	500mL H2SO4 plastic		
VG9T	40mL Na Thio. clear vial	AG1U	1liter unpres amber glass	BP2U	500mL unpreserved plastic		
VG9U	40mL unpreserved clear vial	AG2N	500mL HNO3 amber glass	BP2Z	500mL NaOH, Zn Acetate		
BG1S	1liter H2SO4 clear glass	AG2S	500mL H2SO4 amber glass	BP3B	250mL NaOH plastic		
BG1U	1liter unpres glass	AG3S	250mL H2SO4 amber glass	BP3F	250mL HNO3 plastic - field filtered	WT	Water
BG3H	250mL HCL Clear glass	AG2U	500mL unpres amber glass	BP3N	250mL HNO3 plastic	SL	Solid
BG3U	250mL Unpres Clear glass	AG3U	250mL unpres amber glass	BP3U	250mL unpreserved plastic	NAL	Non-aqueous Liquid
WGDU	16oz clear soil jar	AG4U	125mL unpres amber glass	BP3S	250mL H2SO4 plastic	OL	OIL
		AG5U	100mL unpres amber glass	BP3Z	250mL NaOH, Zn Acetate	WP	Wipe
				BP4U	125mL unpreserved plastic	DW	Drinking Water
				BP4N	125mL HNO3 plastic		
				BP4S	125mL H2SO4 plastic		
				WPDU	16oz unpreserved plastic		

Work Order Number:

60459928

[illegible]

Due Date: 9/19/2024

***In 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.



November 19, 2024

Jake Humphrey
Evergy, Inc.
818 S Kansas Avenue
Topeka, KS 66612

RE: Project: JEC BASA/BAL BAA-3
Pace Project No.: 60463174

Dear Jake Humphrey:

Enclosed are the analytical results for sample(s) received by the laboratory on October 24, 2024. 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,

Alice Spiller
alice.spiller@pacelabs.com
(913)599-5665
PM Lab Management

Enclosures

cc: Shelly Gomez, Evergy
Laura Hines, Evergy, Inc.
Shannon Hughes, Evergy
Adam Irvin, Evergy
Samantha Kaney, Haley & Aldrich
Nick Williams, Haley Aldrich



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: JEC BASA/BAL BAA-3

Pace Project No.: 60463174

Pace Analytical Services Kansas

9608 Loiret Boulevard, Lenexa, KS 66219

Arkansas Certification #: 88-00679

Illinois Certification #: 2000302023-6

Colorado Division of Oil and Public Safety

Iowa Certification #: 118

Kansas Field Laboratory Certification #: E-92587

Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055

Missouri Inorganic Drinking Water Certification

Nevada Certification #: KS000212024-1

Oklahoma Certification #: 2023-073

Texas Certification #: T104704407-23-17

Utah Certification #: KS000212022-13

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SAMPLE SUMMARY

Project: JEC BASA/BAL BAA-3

Pace Project No.: 60463174

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60463174001	BAA-3-102324	Water	10/23/24 11:25	10/24/24 00:48

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SAMPLE ANALYTE COUNT

Project: JEC BASA/BAL BAA-3

Pace Project No.: 60463174

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60463174001	BAA-3-102324	EPA 300.0	AAA	1	PASI-K

PASI-K = Pace Analytical Services - Kansas City

REPORT OF LABORATORY ANALYSIS

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PROJECT NARRATIVE

Project: JEC BASA/BAL BAA-3

Pace Project No.: 60463174

Method: EPA 300.0

Description: 300.0 IC Anions 28 Days

Client: Evergy Kansas Central, Inc.

Date: November 19, 2024

General Information:

1 sample was 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.

Additional Comments:

Analyte Comments:

QC Batch: 914096

E: Analyte concentration exceeded the calibration range. The reported result is estimated.

- MS (Lab ID: 3619084)
 - Chloride
- MSD (Lab ID: 3619085)
 - Chloride

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

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ANALYTICAL RESULTS

Project: JEC BASA/BAL BAA-3
Pace Project No.: 60463174

Sample: BAA-3-102324		Lab ID: 60463174001		Collected: 10/23/24 11:25		Received: 10/24/24 00:48		Matrix: Water	
Parameters		Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
300.0 IC Anions 28 Days		Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City							
Chloride	81.2	mg/L	20.0	20		10/29/24 12:06	16887-00-6		

REPORT OF LABORATORY ANALYSIS



QUALITY CONTROL DATA

Project: JEC BASA/BAL BAA-3

Pace Project No.: 60463174

QC Batch: 914096

Analysis Method: EPA 300.0

QC Batch Method: EPA 300.0

Analysis Description: 300.0 IC Anions

Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60463174001

METHOD BLANK: 3619080

Matrix: Water

Associated Lab Samples: 60463174001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<1.0	1.0	10/29/24 11:28	

LABORATORY CONTROL SAMPLE: 3619081

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	5	5.1	101	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3619082 3619083

Parameter	Units	60463174001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chloride	mg/L	81.2	100	100	171	176	90	95	80-120	3	15	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3619084 3619085

Parameter	Units	60462435004 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chloride	mg/L	184	50	50	224	227	80	84	80-120	1	15	E

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

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QUALIFIERS

Project: JEC BASA/BAL BAA-3

Pace Project No.: 60463174

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.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

ANALYTE QUALIFIERS

E Analyte concentration exceeded the calibration range. The reported result is estimated.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: JEC BASA/BAL BAA-3
Pace Project No.: 60463174

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60463174001	BAA-3-102324	EPA 300.0	914096		

REPORT OF LABORATORY ANALYSIS

	DC#_Title: ENV-FRM-LENE-0009_Sample		
	Revision: 2	Effective Date: 01/12/2022	

Client Name: PKC

Courier: FedEx ☐ UPS ☐ VIA ☐ Clay ☐ PEX ☐ ECI ☐ Pace ☐ Xroads ☐ Client ☒ Other ☐

Tracking #: _____ Pace Shipping Label Used? Yes ☒ No ☐

Custody Seal on Cooler/Box Present: Yes ☒ No ☐ Seals intact: Yes ☒ No ☐

Packing Material: Bubble Wrap ☐ Bubble Bags ☐ Foam ☐ None ☐ Other ☒

Thermometer Used: poly Type of Ice: Wet ☒ Blue ☐ None ☐

Cooler Temperature (°C): As-read 1.7 Corr. Factor 0.1 Corrected 1.6

Date and initials of person examining contents: WJG 24

Temperature should be above freezing to 6°C

Chain of Custody present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Chain of Custody relinquished:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples arrived within holding time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Short Hold Time analyses (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Rush Turn Around Time requested: <u>2 day</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Sufficient volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Correct containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Pace containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Filtered volume received for dissolved tests?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Sample labels match COC: Date / time / ID / analyses	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples contain multiple phases? Matrix: <u>Vt</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
Containers requiring pH preservation in compliance? (HNO ₃ , H ₂ SO ₄ , HCl<2; NaOH>9 Sulfide, NaOH>10 Cyanide) (Exceptions: VOA, Micro, O&G, KS TPH, OK-DRO) LOT#:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	List sample IDs, volumes, lot #'s of preservative and the date/time added.
Cyanide water sample checks:		
Lead acetate strip turns dark? (Record only)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Potassium iodide test strip turns blue/purple? (Preserve)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Trip Blank present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Headspace in VOA vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Samples from USDA Regulated Area: State:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Additional labels attached to 5035A / TX1005 vials in the field?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

Client Notification/ Resolution:

Copy COC to Client? Y / N

Field Data Required? Y / N

Person Contacted: _____

Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: _____

Date: _____

Client:

ekc
Jec

Profile/EZ #

3166 038

Site:

Notes

COC Line Item	Matrix	VG9H	DG9H	DG9Q	VG9U	DG9U	DG9M	DG9B	BG1U	AG1H	AG1U	AG2U	AG3S	AG4U	AG5U	JGFU	WGKU	WGDU	BP1U	BP2U	BP3U	BP1N	BP3N	BP3F	BP3S	BP3B	BP3Z	WPDU	ZPLC	Other			
1	5																																
2																																	
3																																	
4																																	
5																																	
6																																	
7																																	
8																																	
9																																	
10																																	
11																																	
12																																	

Container Codes

Glass				Plastic				Misc.			
DG9B	40mL bisulfate clear vial	WGKU	8oz clear soil jar	BP1B	1L NaOH plastic	I	Wipe/Swab				
DG9H	40mL HCl amber vial	WGKU	4oz clear soil jar	BP1N	1L HNO3 plastic	SP5T	120mL Coliform Na Thiosulfate				
DG9M	40mL MeOH clear vial	WG2U	2oz clear soil jar	BP1S	1L H2SO4 plastic	ZPLC	Ziploc Bag				
DG9Q	40mL TSP amber vial	JGFU	4oz unpreserved amber wide	BP1U	1L unpreserved plastic	AF	Air Filter				
DG9S	40mL H2SO4 amber vial	AG0U	100mL unres amber glass	BP1Z	1L NaOH, Zn Acetate	C	Air Cassettes				
DG9T	40mL Na Thio amber vial	AG1H	1L HCl amber glass	BP2B	500mL NaOH plastic	R	Terracore Kit				
DG9U	40mL amber unpreserved	AG1S	1L H2SO4 amber glass	BP2N	500mL HNO3 plastic	U	Summa Can				
VG9H	40mL HCl clear vial	AG1T	1L Na Thiosulfate clear/amber glass	BP2S	500mL H2SO4 plastic						
VG9T	40mL Na Thio. clear vial	AG1U	1liter unpres amber glass	BP2U	500mL unpreserved plastic						
VG9U	40mL unpreserved clear vial	AG2N	500mL HNO3 amber glass	BP2Z	500mL NaOH, Zn Acetate						
BG1S	1liter H2SO4 clear glass	AG2S	500mL H2SO4 amber glass	BP3B	250mL NaOH plastic						
BG1U	1liter unpres glass	AG3S	250mL H2SO4 amber glass	BP3F	250mL HNO3 plastic - field filtered	WT	Water				
BG3H	250mL HCL Clear glass	AG2U	500mL unpres amber glass	BP3N	250mL HNO3 plastic	SL	Solid				
BG3U	250mL Unpres Clear glass	AG3U	250mL unpres amber glass	BP3U	250mL unpreserved plastic	NAL	Non-aqueous Liquid				
WGDU	16oz clear soil jar	AG4U	125mL unpres amber glass	BP3S	250mL H2SO4 plastic	OL	OIL				
		AG5U	100mL unpres amber glass	BP3Z	250mL NaOH, Zn Acetate	WP	Wipe				
				BP4U	125mL unpreserved plastic	DW	Drinking Water				
				BP4N	125mL HNO3 plastic						
				BP4S	125mL H2SO4 plastic						
				WPDU	16oz unpreserved plastic						

Work Order Number:

69463174