

March 28, 2022

File No. 27213169.21

Evergy Missouri West, Inc.
818 South Kansas Avenue
Topeka, Kansas 66612

Attention: Jared Morrison –Director, Water and Waste Programs

**RE: Notification of Statistically Significant Level (40 CFR § 257.95 (g))
Fly Ash Impoundment
Sibley Generating Station**

Dear Mr. Morrison:

On behalf of Evergy Missouri West, Inc. (Evergy), in accordance with Title 40 Code of Federal Regulations (40 CFR) 257.95(g) of the U.S. Environmental Protection Agency Federal Coal Combustion Residuals (CCR) Rule (40 CFR 257 and 261), effective October 19, 2015 and subsequent revisions, SCS Engineers has prepared this notification of statistically significant levels (SSL) for an Appendix IV constituent above groundwater protection standards (GWPS) established under 40 CFR 257.102(c) and 257.95 (h) for the Fly Ash Impoundment (FAI) at the Sibley Generating Station. Evergy provided SCS Engineers with groundwater monitoring data collected from the unit groundwater monitoring system that meets the requirements of 40 CFR §257.91 and §257.93.

In accordance with 40 CFR 257.102(c), GWPSs were established at the Sibley FAI as a part of the Closure by Removal of CCR process. GWPSs were determined for each Appendix IV constituent detected in the Fly Ash Impoundment's monitoring wells pursuant to 40 CFR 257.95(h) as summarized below.

The GWPSs for Appendix IV constituents were set equal to the highest value of the MCL, concentrations specified by 40 CFR 257.95(h)(2), or background concentrations. The background concentrations for each of the Appendix IV constituents were determined following the prediction limit statistical procedures as specified in the *“Statistical Method Certification by A Qualified Professional Engineer”* dated October 12, 2017. Appendix IV constituent background samples were collected over eight sampling events between December 2015 and October 2017. Appendix IV constituent background results were reported in the *“2017 Annual Groundwater Monitoring and Corrective Action Report, Fly Ash Impoundment, Sibley Generating Station”* dated January 30, 2018.

Per the Sibley FAI CCR Removal Certification, removal of CCR material from the FAI was confirmed by visual and photographic inspection on September 23, 2021. Groundwater samples for closure confirmation were collected from the Fly Ash Impoundment monitoring wells on November 15, 2021 and analyzed for Appendix IV constituents.

Consistent with statistical analyses completed from previous groundwater monitoring events, the results of the closure sampling event were validated by SCS Engineers on January 7, 2022 and statistical analyses completed by SCS Engineers on February 14, 2022. During this event, an SSL above the GWPS was identified for the following:

Constituent	Well ID
Molybdenum	MW-806R

Sincerely,



John R. Rockhold, P.G.
SCS Engineers

JR/DD/JF



Douglas L. Doerr, P.E.
SCS Engineers