

Former Bottom Ash Settling Area Well Installation

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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Jared Morrison  
Director Environmental Services  
Eversource Energy, Inc

01/10/2024

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Date



Cynthia Sans, ECAD  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219

Electronic document transmitted via email to [sans.cynthia@epa.gov](mailto:sans.cynthia@epa.gov) on January 10, 2024

January 10, 2024

RE: Consent Agreement and Final Order: Docket No. RCRA-07-2023-0001  
Evergy, Inc  
Tecumseh Energy Center Former Bottom Ash Settling Area Well Installation

This submittal has been provided to confirm compliance with paragraph 10.g of the Consent Agreement and Final Order In the Matter of Evergy Kansas Central, Inc. (Evergy): Docket No. RCRA-07-2023-0001 date November 7, 2022 (Consent Order). Per the requirement, within one hundred and eighty (180) days of EPA approval of any of the well development and placement plans, Evergy shall install the approved monitoring wells and initiate sampling in accordance with the schedule included within the approved plans. EPA approved both the Well Placement / Development Plan for the Installation of Additional Monitoring Wells at the Bottom Ash Settling Area Surface Impoundment Tecumseh Energy Center and the Nature and Extent Investigation Well Placement/Development Plan Tecumseh Energy Center for the former bottom ash settling area (BASA) on July 21, 2023. Per the above listed requirement, monitoring wells must be installed no later than January 17, 2024.

Between October 23, 2023, and November 22, 2023, thirteen (13) monitoring wells were drilled, installed, and developed according to the requirements of the two EPA-approved plans - Nature and Extent Investigation Well Placement/Development Plan and Well Placement/Development Plan for the Installation of Additional Monitoring Wells at the Bottom Ash Settling Area Surface Impoundment. In addition to the monitoring wells included in the approved plans, Evergy installed one additional well as noted in the well summary below.

- Four (4) compliance monitoring wells (B-1 through B-4, soon to be MW-11(A) through MW-14) were installed directly downgradient of the BASA to monitor groundwater quality passing the former waste boundary. These monitoring wells were installed at locations, as shown in the attached figure, to depths ranging from 22 – 27 feet below ground surface (bgs) within the glacial till material directly above the shale confining unit. Preliminary findings indicated that a sufficient water column is present to support groundwater sampling downgradient of the BASA.
- Nine (9) N&E monitoring wells (MW-12D and MW-15 through MW-22) were installed both downgradient and upgradient of the BASA to investigate the extent of arsenic and cobalt in groundwater within the vicinity of the unit. Monitoring wells included five (5) shallow monitoring wells (MW-15 through MW-19), screened directly above bedrock consistent with the compliance monitoring wells, and four (4) deep monitoring wells (MW-12D and MW-20 through MW-22), screened in the first bedrock water bearing unit at depths ranging from 76 to 88 feet bgs. Monitoring wells were installed at their proposed locations as shown in the attached figure with an exception to MW-19.
  - Due to construction activities and the current use of the historic plant and coal pile area, N&E monitoring well MW-19 was installed at a location approximately 250 feet north of the proposed monitoring well location. The final well placement is sufficient to achieve the objective for the nature and extent monitoring program by providing upgradient/side gradient groundwater elevations and groundwater quality monitoring.

- Monitoring well MW-12D was added to the scope during drilling activities to provide additional bedrock characterization directly adjacent to the BASA.
- Contingency monitoring well MW-23, which was proposed in the N&E Placement/Development Plan, was not installed based on preliminary analytical data collected during the installation activities.

The first round of baseline compliance samples and N&E groundwater samples were collected on December 14, 2023, at all new and existing monitoring wells at the BASA in accordance with the approved Sampling and Analysis Plan (SAP).

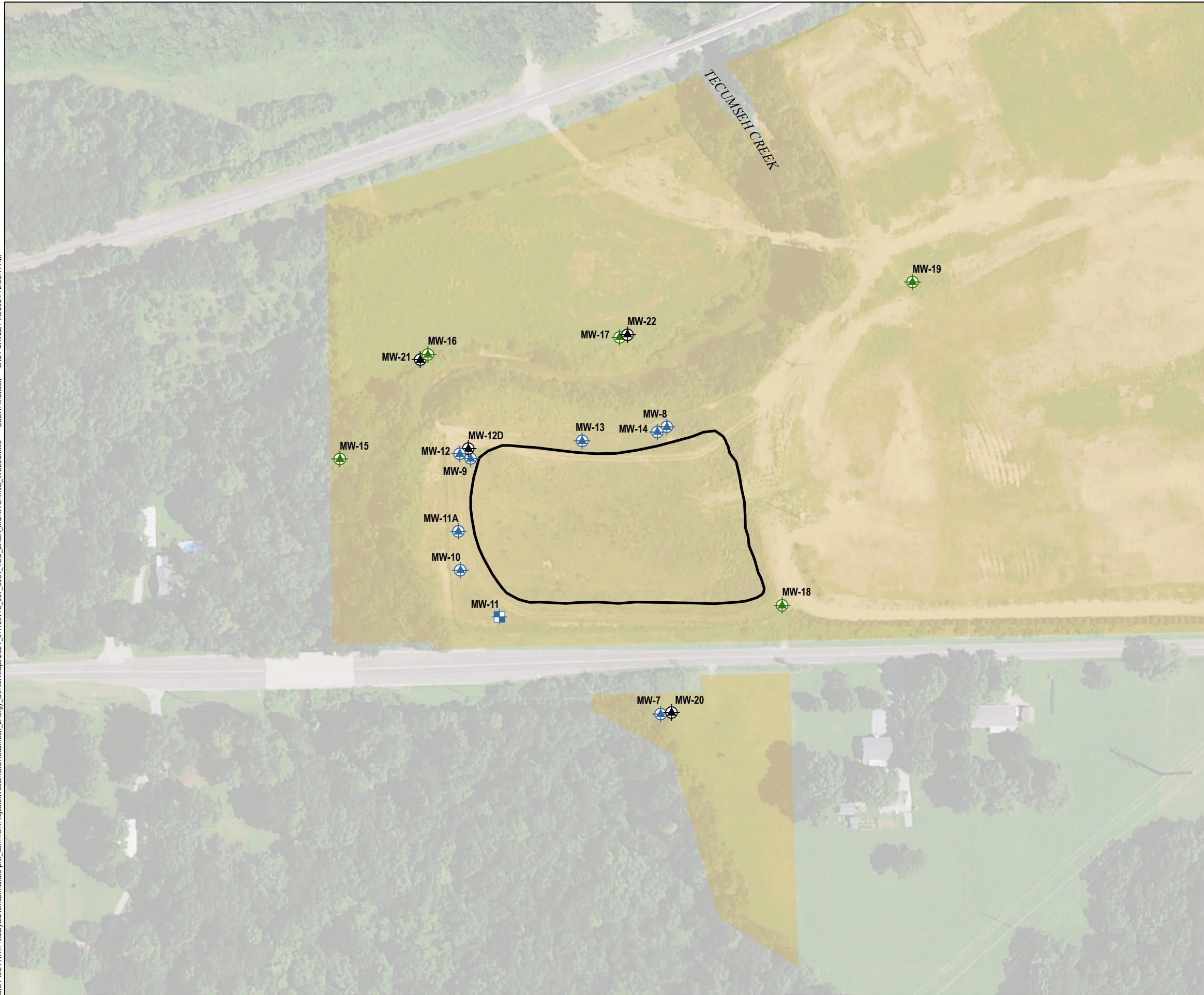
If there are any questions on this submittal, please contact me at [jared.morrison@evergy.com](mailto:jared.morrison@evergy.com) or (785) 231-9577.

Sincerely,









Jared Morrison  
Director, Environmental Services  
Evergy, Inc.

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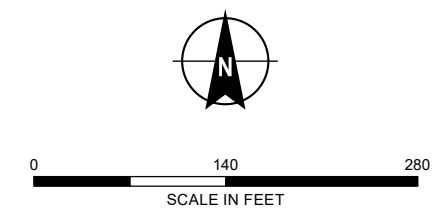


**LEGEND**

-  PIEZOMETER OBSERVATION ONLY
-  COMPLIANCE MONITORING WELL
-  SHALLOW NATURE AND EXTENT MONITORING WELL
-  DEEP NATURE AND EXTENT MONITORING WELL
-  BOTTOM ASH SETTLING AREA (BASA) UNIT BOUNDARY/APPROXIMATE EDGE OF FORMER WASTE BOUNDARY
-  EVERGY KANSAS CENTRAL INC. PROPERTY

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: HEXAGON IMAGERY PROGRAM, 2023



**HALEY ALDRICH** EVERGY KANSAS CENTRAL, INC.  
TECUMSEH ENERGY CENTER  
TECUMSEH, KANSAS

**TEC BASA MONITORING WELLS**