2023 ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Montrose Generating Station

400 Southwest Highway P, Clinton, Missouri 64735

December 10, 2023

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Revision History

Revision Number	Revision Date	Section Revised	Summary of Revisions
0	12/10/2023	N/A	Original Version

1.0 Background

The purpose of this Annual CCR Fugitive Dust Control Report is to describe the Coal Combustion Residuals (CCR) fugitive dust control actions taken over the past year to control CCR fugitive dust; provide a record of all citizen complaints received; and to provide a summary of corrective measures taken at the Montrose Generating Station (Montrose). The following sections provide background information on the facility, CCR, and related regulatory requirements.

1.1 Facility Information

Name of Facility:	Montrose Generating Station (Montrose)
Name of Operator:	Evergy Metro, Inc (Evergy)
Operator Mailing Address:	400 SW Highway P, Clinton, MO 64735
Location:	Approximately ten miles southwest of Clinton, Missouri.
Facility Description:	The Montrose Generating Station ceased operations in 2018. Historically, Montrose was a coal-fired electric generating station that contained two coal-fired units that produced fly ash and bottom ash. CCRs generated were managed in three CCR units, including the North Ash Impoundment, the South Ash Impoundment, and one CCR Landfill. Fly ash was collected and pneumatically conveyed to silos where it was off-loaded for beneficial use or transported via tanker truck to the landfill. Bottom ash was sluiced to dewatering bins where it was loaded into trucks for beneficial use or transported to the landfill for storage or disposal. The landfill is currently being used to dispose of CCR from other Evergy facilities in Missouri.

1.2 Coal Combustion Residuals

CCR materials are produced at coal-fired power plants when coal is burned to produce electricity. CCR materials are managed by coal-fired power plant sites, including on-site storage, processing (such as dewatering), and final disposal, typically in CCR landfills.

1.3 Regulatory Requirements

This report has been developed for the Montrose Generating Station in accordance with 40 CFR 257.80 (c). The CCR rule requires preparation of an Annual CCR Fugitive Dust Control Report for facilities including CCR landfills, CCR surface impoundments, and any lateral expansion of a CCR unit. Selective definitions from the CCR rule are provided below:

> **CCR (coal combustion residuals)** means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.
>
> **CCR fugitive dust** means solid airborne particulate matter that contains or is derived from CCR, emitted from any source other than a stack or chimney.
>
> **CCR landfill** means an area of land or an excavation that receives CCR and which is not a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground or surface coal mine, or a cave. For purposes of this subpart, a CCR landfill also includes sand and gravel pits and quarries that receive CCR, CCR piles, and any practice that does not meet the definition of a beneficial use of CCR.
>
> **CCR surface impoundment** means a natural topographic depression, manmade excavation, or diked area, which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR.
>
> **CCR unit** means any CCR landfill, CCR surface impoundment, or lateral expansion of a CCR unit, or a combination of more than one of these units, based on the context of the paragraph(s) in which it is used. This term includes both new and existing units, unless otherwise specified.

The CCR Rule requires that owners or operators of CCR facilities develop and adopt "measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities" (40 CFR 257.80). Evergy prepared and placed a CCR Fugitive Dust Control Plan for this facility into the facility operating record on October 19, 2015. An updated plan was placed in the facility operating record on June 6, 2023. The CCR Rule requires owners or operators to "prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken." In accordance with the same section of the CCR Rule, this report has been developed and placed within the CCR operating record on December 10, 2023.

2.0 CCR Fugitive Dust Controls

Potential CCR fugitive dust sources at the site generally include loading, unloading, transportation in trucks or on conveyors, stockpiles, vehicle traffic, and landfill placement. These general sources are categorized for Montrose for the purposes of CCR fugitive dust management as follows:

(1) CCR short-term storage and management areas;
(2) CCR Landfill Units;
(3) CCR Surface Impoundment Units; and
(4) Facility Roads

Between December 1, 2022 and December 1, 2023, the Montrose Generating Station implemented dust control measures and actions as follows.

2.1 CCR Short-Term Storage and Management Areas

- The Montrose Generating Station power generating operations ceased at the end of 2018. All short-term and temporary CCR management areas have been removed a part of the decommissioning process.

2.2 CCR Landfill Units

- Due to plant decommissioning activities, no CCR(s) generated on-site were added to the landfill in 2022. Only CCR(s) generated from other Evergy facilities were added to the landfill in 2022.
- CCR(s) were conditioned before being place in the landfill.
- During high wind conditions, unloading operations were halted or reduced.
- After final elevations were achieved, the final cap and cover, including vegetation, was installed. This reduces the potential for CCR to be exposed to the atmosphere and dried.
- A twice-daily fugitive dust observation log was completed by landfill personnel during normal hours of operation. This log documented fugitive dust conditions at the on-site landfill and facility haul roads. Any compliance issues identified were addressed and resolved utilizing on-site dust suppression via water trucks.

2.3 CCR Surface Impoundment Unit

- All CCR surface impoundments (SI) at Montrose were certified closed in January 2021.
- No fugitive dust control measures were required.

2.4 Facility Roads

- Due to plant decommissioning, reduced truck traffic was observed at the facility during 2023.
- Reduced vehicle speed limits were enforced to reduce dust mobilization.
- During high wind conditions, operations and related traffic were reduced or halted.
- During non-freezing weather, roads at the facility were sprayed multiple times per day using water trucks when trucks and heavy equipment traffic would utilize facility roads.

- A twice-daily fugitive dust observation log was completed by landfill personnel during normal hours of operation. This log documented fugitive dust conditions at the on-site landfill and facility haul roads. Any compliance issues identified were addressed and resolved utilizing on-site dust suppression via water trucks.

3.0 Citizen Complaints

Evergy has implemented a plan for logging of citizen CCR dust complaints in accordance with 40 CFR 257.80(b)(3). Under this plan, all records of any citizen concerns regarding CCR fugitive dust will be maintained within the Annual CCR Fugitive Dust Control Report to document the complaint and to detail corrective actions.

On January 13th, 2023 at 13:00, Evergy personnel were contacted by a local resident, Mr. Bob Stewart. In this communication, Mr. Stewart indicated to Evergy personnel that that he believed fly ash had accumulated on his personal vehicle contained on his personal property. Following this communication, Evergy personnel went out to Mr. Stewart's property to discuss the issue and to observe the suspected fly ash that had accumulated at Mr. Stewart's residence. During this site visit, Mr. Stewart communicated that he first observed what he suspected was fly ash on his vehicle several weeks prior. Evergy personnel communicated that they would investigate Montrose's fugitive dust control efforts and see if any issues could be addressed. Additionally, Evergy personnel provided Mr. Stewart with direct contact information to the Evergy Environmental Services and requested that he reach out should similar conditions be encountered again. In March of 2023, Mr. Stewart reached out to Evergy personnel again and complained that a "yellow dust" had accumulated on his vehicle. Evergy personnel, once again, met with Mr. Stewart and inquired if this yellow dusting could be due to exposed insulation from a nearby trailer. Follow-up communication was initiated by the site ECC, Brian Duckworth on March 1st and May 9th to confirm dust control efforts and see if Mr. Stewart had witnessed any other suspected fugitive dust events. No additional complaints were recorded from these conversations.

Following the initial site visit, Evergy personnel contacted Kissick Construction, the landfill operator, to discuss fugitive dust control efforts. During this discussion, current fugitive dust control efforts and possible additional fugitive dust control efforts were discussed. During this process, Kissick communicated that conditioning of CCR material and other dust suppression efforts had not been impeded during the period in which the compliant was received, as well as the indicated historical dates identified by Mr. Stewart.

However, to adequately address the concerns raised, several corrective measures were enacted to meet with Montrose's fugitive dust management obligations. First, maintenance of all fugitive dust control equipment and practices at the site were confirmed with landfill personnel. Second, landfill personnel began efforts to log fugitive dust conditions at the site, twice daily, to confirm fugitive dust control efforts. This log was introduced and began to be utilized by landfill personnel in Q1 of 2023. Following a trial period of 90 Days, this log was maintained as a permanent part of Montrose's fugitive dust obligations. An updated Montrose Fugitive Dust control plan, which includes the fugitive dust observation log, was finalized and added to the operating record on June 6th, 2023. Since its introduction and addition to the operating record, no additional fugitive dust complaints have been received.

In accordance with 40 CFR 257.80(b)(3), a copy of CCR Fugitive Dust Complaint Record, included within the Montrose CCR Fugitive Dust Control Plan, is included within this report in Appendix A.

No additional complaints were received by Montrose or Evergy between December 1, 2022 and December 1, 2023.

4.0 Summary of Corrective Measures

The Evergy Environmental Services Department performed an annual review for logged complaints and of the CCR dust control measures in place for Montrose Generating Station. Evergy found the measures in place were effective, during the period of December 1, 2022 to December 1, 2023.

However, to adequately address the concerns raised in a citizen fugitive dust complaint received on January 13, 2023, several corrective measures were enacted. First, maintenance of all fugitive dust control equipment and practices at the site were confirmed with landfill personnel. Second, landfill personnel began efforts to log fugitive dust conditions at the site, twice daily, to confirm fugitive dust control efforts. This log was introduced and began to be utilized by landfill personnel in Q1 of 2023. Following a trial period of 90 Days, this log was maintained as a permanent part of Montrose's fugitive dust obligations. An updated Montrose Fugitive Dust control plan, which includes the fugitive dust observation log, was finalized and added to the operating record on June 6th, 2023. Since its introduction and addition to the operating record, no additional fugitive dust complaints have been received.

No additional changes to fugitive dust practices or corrective measures were initiated by Montrose or Evergy between December 1, 2022 and December 1, 2023.

Appendix A

CCR FUGITIVE DUST COMPLAINT RECORD

Site Name	Montrose Generating Station (decommissioned) CCR Landfill
Time & Date of Correspondence	January 13, 2023 / 1:00 PM
Name of Citizen	Mr. Bob Stewart
Phone Number	660-351-1895
Mailing address	
Email Address	
Topic of Correspondence	Complainant reported concerns of fly ash on his vehicle which is located at his residence, approximately 1.6 miles NNW of the Montrose Landfill.
Describe Observed Event (include date/time; wind & conditions, other info)	Complainant reported first seeing ash on his vehicle a few weeks ago after strong south winds from the south (40 mph) There has been burning of cleared trees to the NNW of the complainants property.
Required Corrective Actions or Follow-Up, If Applicable	ECC will follow up with and review the Fugitive Dust Control Plan with the landfill contractor, Kissick.