

2020 ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Sibley Generating Station

33200 East Johnson Road, Sibley, Missouri 64088

December 18, 2020

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Revision History

Revision Number	Revision Date	Section Revised	Summary of Revisions

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 Sibley Generating Station (Sibley). The following sections provide background information on the facility, CCR, and related regulatory requirements.

1.1 Facility Information

Name of Facility:	Sibley Generating Station (Sibley)
Name of Operator:	Evergy Metro, Inc (Evergy)
Operator Mailing Address:	33200 East Johnson Road, Sibley, MO 64088
Location:	Approximately 4.5 miles north of Buckner, Missouri. East of and adjacent to Sibley, Missouri
Facility Description:	The Sibley Generating Station ceased operations in 2018. Historically, Sibley was a coal-fired electric generating station that contained three coal-fired units. CCR produced at the facility included fly ash and bottom ash as slag. CCR was managed in three CCR units, including the Slag Settling Impoundment, Fly Ash Impoundment, and CCR Landfill. Fly ash was collected and either pneumatically conveyed to a silo or sluiced to the Fly Ash Impoundment. Fly ash was off-loaded from the silo for beneficial use or conditioned and transported via truck to the landfill or placed in the Fly Ash Impoundment for conditioning. The bottom ash (slag) was, historically, sluiced to the Slag Settling Impoundment, and then moved by excavator to a concrete slab where it was loaded into trucks for beneficial use or transported to the landfill for disposal. The landfill is currently being used to dispose of coal remnants and de minimis quantities of CCR from the plant closure and is used to dispose 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 Sibley 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. 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 18, 2020.

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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 Sibley 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 November 2019 and November 2020, the Sibley Generating Station implemented dust control measures and actions as follows.

2.1 CCR Short-Term Storage and Management Areas

- Plant operations ceased at the of 2018. All short-term and temporary CCR management areas have been removed a part of the decommissioning process.
- Any uses of equipment in the short-term-management of CCR were generally for disposing of CCR residuals discovered on-site.
- During loading and unloading activities, drop height was reduced to prevent mobilization of CCR dust.
- Spilled CCR was wetted, as necessary, and removed using a street sweeper, loader, or vacuum system to prevent dusting.
- During staging, water spray was applied, as necessary, to the CCR to prevent dusting.

2.2 CCR Landfill Units

- Due to plant decommissioning activities, little CCR(s) was added to the landfill in 2020. Some coal remnants were added as a part of the plant decommissioning process.
- CCR that was unencapsulated was conditioned before being placed into the landfill.
- Water was added, as needed, to the CCR materials to reduce wind dispersal and improve compaction during CCR placement in the landfill.
- During high wind conditions, unloading operations at the working face were reduced or halted.
- Areas that have achieved final elevations have been covered with soils and vegetated. This includes areas in the south and west edges of the landfill.

2.3 CCR Surface Impoundment Unit

- Sibley generating station has no active CCR Surface Impoundments. The unit is currently undergoing closure by removal.
- Historically, CCR surface impoundments (SI), CCR was stored as a slurry mixture with high water content and did not cause dusting.

2.4 Facility Roads

- Due to plant decommissioning, reduced truck traffic was observed at the facility during 2020.

- 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, when required by operating and weather conditions, roads at the facility were sprayed multiple times per day using water trucks.
- Paved roads at the facility were cleaned by a sweeper/vacuum truck and, during periods of high traffic and/or dry weather, when required by operating and weather conditions, were sprayed by water trucks.
- Prior to transportation, when needed, CCR was covered using tarps; or water was added to CCR prior to transportation.

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). No complaints were received by Sibley or Evergy between November 2019 and November 2020.

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 Sibley Generating Station. Evergy found the measures in place were effective, and no changes or corrective measures were necessary during the period of November 2019 to November 2020.