



2023 ANNUAL CCR FUGITIVE DUST CONTROL REPORT

Iatan Generating Station

20250 Hwy. 45 North, Weston, Missouri 64098

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

1.1 Facility Information

Name of Facility:	Iatan Generating Station (Iatan)
Name of Operator:	Evergy Metro, Inc (Evergy)
Operator Mailing Address:	20250 Hwy. 45, Weston, MO 64098
Location:	Approximately five miles northwest of Weston, Missouri.
Facility Description:	The Iatan Generating Station is a coal-fired electric generating station that contains two coal-fired units that produce fly ash, bottom ash, and gypsum. Both units are operated in a similar manner for the purposes of CCR dust control. CCRs, not beneficially used, are disposed in the CCR Landfill. Fly ash is collected and pneumatically conveyed to silos where it is off-loaded for beneficial use or conditioned and transported via truck to the landfill. Bottom ash is handled through a submerged flight conveyor to a paved stack-out area where it is loaded into trucks and transported to a paved storage area. From the storage area the bottom ash is either shipped off-site for beneficial use or transported to the landfill for disposal. Gypsum is conveyed via conveyor and radial stacker to a concrete-contained stack-out area where it is either shipped off-site for beneficial use or transported to the landfill for disposal. An inactive, incised earthen surface impoundment, located in the northwest area of the plant property, has undergone closure by removal of the CCR material.

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 Iatan 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). Everygy 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 April 16, 2021. 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 later 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 Unit; and
- (4) Facility Roads

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

2.1 CCR Short-Term Storage and Management Areas

- Gypsum generated was pre-conditioned and the gypsum conveyor was covered.
- CCR dust from fly ash was minimized by use of an enclosed pneumatic transport system and silos for staging. Storage silos were equipped and operated with bin vent filters.
- Fly ash designated for landfiling was conditioned prior to loading into trucks. Fly ash was conditioned to approximately 10% moisture and then trucked to the landfill.
- During loading and unloading activities, drop height was reduced as practice, to reduce the potential for mobilization of CCR dust.
- During high wind conditions, loading and management operations were modified, reduced, or halted.
- Bottom ash was managed wet prior to storage.
- A street sweeper was used to clean spilled CCR to prevent dusting, as necessary.
- Water spray was applied as necessary to CCR prior to and/or during staging.
- Routine housekeeping was completed at regular intervals in CCR loading areas to prevent CCR accumulation.

2.2 CCR Landfill Units

- CCR 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.
- Water spray was applied to the exposed CCR, including on the working face, as needed.
- During high wind conditions, unloading operations at the working face were reduced or halted.

2.3 CCR Surface Impoundment Unit

- Evergy has no active CCR Impoundments at Iatan. Closure of this unit was completed on March 16, 2022, per notice provided to the Missouri Department Natural Resources (MDNR).

2.4 Facility Roads

- Reduced vehicle speed limits were enforced to reduce dust mobilization. During high wind conditions, operations and related traffic were reduced or halted.
- Prior to transportation, when needed, CCR was covered using tarps; or water was added to CCR prior to transportation.
- During non-freezing weather, when required by operating and weather conditions, unpaved 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, and when required by operating and weather conditions, were sprayed by water trucks.

3.0 Citizen Complaints

Evergy has implemented a plan for logging 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 19th, 2023, at 9:00 AM, Iatan Generating Station was visited by an MDNR Solid Waste inspector, Daniel Simmons. Mr. Simmons communicated that he was visiting the site in relation to a fugitive dust control complaint that had been logged with EPA Region 7. The complainant, Mr. David Rylance, indicated that dust appeared to be coming off the fly ash silo at the Iatan Generating Station and was depositing in the surrounding area. The on-site Environmental Compliance Coordinator, Andrew Hare, accompanied Mr. Simmons during this inspection. The inspector visited the CCR loading and storage silos at Iatan and observed the operating conditions. During the inspection all conditions observed were found to be compliant and no corrective action or follow up was required by MDNR.

Based upon feedback from the inspector, it was indicated that Kansas City Fly Ash, the site's fly ash marketer was the complainant of record. Following this inspection, environmental personnel met with representative from Kansas City Fly Ash to discuss their concerns. Based on this conversation, it was indicated that the main concern dealt with the loading of ash by both KC Fly Ash and Kissick, the landfill operator, at the same time.

Once this concern had been identified, several corrective measures were enacted to meet Iatan's fugitive dust management obligations. First, additional maintenance was scheduled for the Unit 2A fly ash conditioner to ensure limited dust formation during loading. Second, the installation of three new ash conditioners was added to the planned maintenance activities for the fall 2023 outage. Third, Kissick dedicated five primary staff to a deep cleaning of the ash silo areas to remove any potential sources of dust from the pad. Fourth, Kissick dedicated personnel to perform housekeeping on the concrete pad during each shift to limit any overlooked accumulations of CCR. And finally, Iatan environmental personnel scheduled and completed a discussion with Kissick and KC Fly Ash on January 31, 2023. The focus of this discussion centered upon a review of the Iatan Fugitive Dust Control Plan and a review of the compliance obligations detailed within the plan.

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

No additional complaints were received by Iatan 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 Iatan Generating Station. In general, Evergy found the measures in place were effective, and no changes or corrective measures were necessary during the period of December 1, 2022, to December 1, 2023.

Failures identified during the compliance period centered around confirmation of housekeeping conditions at the fly ash silos and coordination of CCR loading between Kissick and KC Fly Ash. These failures were addressed with the following corrective actions: First, additional maintenance was scheduled for the Unit 2A fly ash conditioner to ensure limited dust formation during loading. Second, the installation of three new ash conditioners was added to the planned maintenance activities for the fall 2023 outage. Third, Kissick dedicated five primary staff to a deep cleaning of the ash silo areas to remove any potential sources of dust from the pad. Fourth, Kissick dedicated personnel to perform housekeeping on the concrete pad during each shift to limit any overlooked accumulations of CCR. And finally, Iatan environmental personnel scheduled and completed a discussion with Kissick and KC Fly Ash on January 31, 2023. The focus of this discussion centered upon a review of the Iatan Fugitive Dust Control Plan and a review of the compliance obligations detailed within the plan.

No additional corrective measures were initiated by Iatan or Evergy between December 1, 2022, and December 1, 2023.

Appendix A

CCR FUGITIVE DUST COMPLAINT RECORD

Site Name	latan Generating Station
Time & Date of Correspondence	1-19-23 9:00 am
Name of Citizen	David Rylance
Phone Number	816-812-8316
Mailing address	15100 E Courtney-Atherton Rd Sugar Creek Mo 64058
Email Address	<drylance@kcflyash.com>
Topic of Correspondence	Fugitive Dust
Describe Observed Event (include date/time; wind & conditions, other info)	When loading is being conducted out of both silos simultaneously. 1/19/23 9 am(Time of email correspondence). No conditions were provided relating to original observation.
Required Corrective Actions or Follow-Up, if Applicable	Kissick is Dedicating staff to deep clean area, KCFA and Kissick will load at different times. Email from 1-30-23 outlines maintenance to be performed on ash conditioner 2A. Two new ash conditioners to be installed Fall 2023.