



**2020 ANNUAL CCR FUGITIVE
DUST CONTROL REPORT**

Montrose Generating Station

400 Southwest Highway P, Clinton, Missouri 64735

December 18, 2020

Table of Contents

1.0 Background..... 2

1.1 Facility Information

1.2 Coal Combustion Residuals

1.3 Regulatory Requirements

2.0 Fugitive Dust Controls..... 4

2.1 CCR Short-Term Storage and Management Areas

2.2 CCR Landfill

2.3 Facility Roads

3.0 Citizen Complaints..... 5

4.0 Summary of Corrective Measures..... 6

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 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 coal remnants and de minimis quantities of CCR from the plant closure and may be 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 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. 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.

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

2.1 CCR Short-Term Storage and Management Areas

- Plant operations ceased at the end 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.

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 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.
- 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.

2.3 CCR Surface Impoundment Unit

- In 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, reduce 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.

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 Montrose 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 Montrose 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.