BURNS McDONNELL

December 17, 2020

Jared Morrison
Director, Waste and Water Programs
Evergy Metro, Inc.
1200 Main St.
Kansas City, MO 64105

Re: Iatan Ash Impoundment Extension of Closure Timeframe

Dear Jared:

The purpose of this document is to indicate Evergy Metro, Inc.'s (Evergy's) demonstration for a two-year extension to the timeframe for completing closure of the Ash Impoundment at the Iatan Generating Station (Iatan) due to factors beyond the facility's control. Since the Ash Impoundment is larger than 40 acres, the closure timeframe may be extended in up to five, two-year increments per 40 CFR § 257.102(f)(2)(ii)(B) if the need for the extension can be substantiated. Per § 257.102(f)(2)(i), the following factors may be considered to support closure timeframe extensions:

A. Complications stemming from the climate and weather, such as unusual amounts of precipitation or a significantly shortened construction season;
B. Time required to dewater a surface impoundment due to the volume of CCR contained in the CCR unit or the characteristics of the CCR in the unit;
C. The geology and terrain surrounding the CCR unit will affect the amount of material needed to close the CCR unit; or
D. Time required or delays caused by the need to coordinate with and obtain necessary approvals and permits from a state or other agency.

As noted in the Ash Impoundment Closure Plan (Revision 0, 4/13/2018), closure construction activities began in April 2016 and were projected to be completed by April of 2021 (within five years of commencing closure construction as required by § 257.102(f)(1)(ii)). As of November 5, 2020, the contractor had removed approximately 1,510,000 cubic yards (CY) of ponded sediment from the impoundment and an estimated 190,000 CY remained to be removed. CCR material from the north portion of the impoundment was blasted, mechanically excavated to the extent practicable, hauled to the site landfill, and compacted. Submerged sediment continues to be hydraulically dredged from the impoundment and pumped to geotextile tubes for dewatering. The geotextile tubes sit for a period of time dictated by weather conditions and other contractor activities before the dewatered material inside can be excavated and loaded onto haul trucks and placed in the facility's onsite CCR landfill.

The original understanding was that the impoundment was used primarily to store bottom ash (apart from the north portion which contained fly ash that cemented over time, hence the need for blasting), and the bottom ash would be able to dewater in the geotextile tubes in

approximately two weeks; however, the ponded sediment is a mixture of bottom ash, fly ash, and silt, and takes much more time to dewater than expected. The contractor currently allows the geotextile tubes to sit for approximately two months prior to removing the material from the tubes. Once placed in the landfill, the material needs further conditioning in order to meet project compaction limits. This dewatering process has slowed construction progress considerably.

Dredging work and dewatering are limited by winter weather and cannot occur when the pond and the geotextile tubes are frozen, which also slows the removal and disposal processes. The contractor filled multiple geotextile tubes in the fall of 2018 before demobilizing for the winter months; however, due to significant periods of rain and the resulting Missouri River flood events, access to the impoundment area was limited from March 2019 through April 2020, making closure construction progress minimal throughout that time period. The impoundment closure contractor was not able to resume hauling material from the geotextile tubes until April of 2020. Once the dredged material was removed from the existing geotextile tubes, the dredging contractor deployed additional geotextile tubes so that dredging could re-commence in mid-June 2020.

Based on the estimated remaining quantity of material in the impoundment and current dredge production rates, it is anticipated that closure will be completed within the two-year extension timeframe. As discussed above, the extension is substantiated based on impacts of climate (§ 257.102(f)(2)(i)(A)) and challenges dewatering the CCR material (§ 257.102(f)(2)(i)(B)). The certification statement required under § 257.102(f)(2)(iii) has been provided at the end of this letter and is signed by an authorized representative of the Owner/Operator.

Sincerely,

Ed Tohill

Ed Tohill, P.E.
Engineer of Record

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Jared Morrison
Director, Waste and Water Programs
December 17, 2020