

August 28, 2020
File No. 27213169.20

MEMORANDUM

TO: Jared Morrison, Director Water and Waste Programs
Evergy Metro, Inc. (f/k/a Kansas City Power & Light Co., Inc.)

FROM: Douglas L. Doerr, SCS Engineers
John R. Rockhold, SCS Engineers

SUBJECT: **40 CFR 257.102 (c) Closure by Removal of CCR Certification
Sibley Generating Station
Slag Settling Impoundment
Groundwater Monitoring Concentrations Evaluation and Closure**

This memorandum presents the results of groundwater monitoring performed by SCS Engineers following removal of coal combustion residuals (CCR) from the Slag Settling Impoundment (Impoundment) at the Sibley Generating Station (Station) and certification of final closure. The Station's CCR surface impoundment is subject to Federal Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments per 40 CFR 257 Subpart D (CCR Rule) and is operated by Evergy Metro, Inc. (Evergy). A document "Notification of Intent to Close" was placed in the CCR Operating Record on January 28, 2020. This was communicated to the Missouri Department of Natural Resources on February 27, 2020.

Evergy retained Kissick Construction to remove slag (a CCR) from the Station's Impoundment through the method of excavation. Evergy retained Burns & McDonnell (BMcD) as certifying engineer to certify that, upon completion of construction, the CCR in the Impoundment has been removed in accordance with Section 2.1 of the facility written closure plan titled "*CCR Closure Plan, Sibley Slag Settling Impoundment, Sibley Generating Station*" (Attachment 1) dated October 14, 2016 as required by 40 CFR 257.102(b); specifically related to removal of CCR from the Impoundment. BMcD certified removal of CCR material from the Impoundment was performed in accordance with the Closure Plan and 40 CFR 257.102(c) per 40 CFR 257.102(f)(3). Removal of CCR from the Impoundment was certified August 27, 2020 (Attachment 2). SCS Engineers has reviewed this document.

In addition to removal of the CCR material, 40 CFR 257.102(c) requires groundwater monitoring concentrations to be below the groundwater protection standard (GWPS) as stated below:

***40 CFR 257.102 (c) Closure by removal of CCR.** An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in Appendix IV to this part.*

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This unit has not entered into assessment groundwater monitoring under 40 CFR 257.95, therefore no corrective measures, remedies, or corrective actions have been required under 40 CFR 257.96 through 257.98 due to releases to groundwater. GWPSs were determined for each Appendix IV constituent detected in the Impoundment monitoring wells pursuant to 40 CFR 257.95(h) as summarized below.

1. If the constituent has a National Primary Drinking Water Regulation Maximum Contaminant Level (MCL) provided by the United States Environmental Protection Agency, the MCL is the GWPS.
2. For cobalt 6 µg/L, lead 15 µg/L, lithium 40 µg/L, and molybdenum 100 µg/L (40 CFR 257.95(h)(2)) (these values adopted from EPA Regional Screening Levels [RSLs]).
3. For constituents with background levels higher than the MCL or higher than the levels listed above in item 2, the background concentration becomes the GWPS.

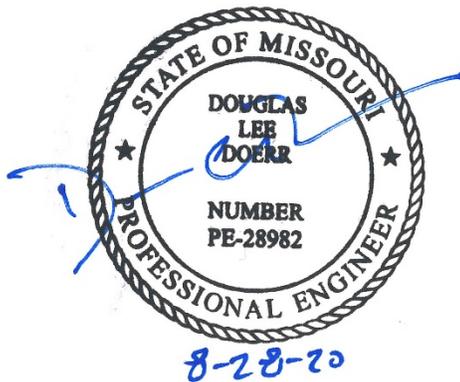
The GWPSs for Appendix IV constituents were set equal to the highest value of the MCL, RSL, or background concentration. The background concentrations for each of the Appendix IV constituents were determined following the prediction limit statistical procedures as specified in the *“Statistical Method Certification by A Qualified Professional Engineer”* dated October 12, 2017. Appendix IV constituent background samples were collected over nine sampling events between December 2015 and October 2017. Appendix IV constituent background results were reported in the *“2017 Annual Groundwater Monitoring and Corrective Action Report, Slag Settling Impoundment, Sibley Generating Station”* dated January 30, 2018.

The following Appendix IV constituents were detected in background samples in at least one of the Impoundment monitoring wells: arsenic, barium, fluoride, lead, lithium, molybdenum, and radium combined (radium 226 and 228). All of the detected constituents were present in background below their MCL or RSL with the exception of arsenic in monitoring well MW-703. Based on these results, the GWPSs for all parameters excluding arsenic in monitoring well MW-703 are the applicable MCL or 40 CFR 257.95(h)(2) RSL value. The GWPS for arsenic in MW-703 is the background concentration for arsenic.

Closure confirmation samples were collected on May 12, 2020 and July 28, 2020 following removal of CCR from the Impoundment. The cobalt results for the sample collected May 12, 2020 were non-detect at a reporting limit above the GWPS. Therefore, another sample was collected July 28, 2020 and analyzed for cobalt with at a reporting limit below the GWPS. Closure confirmation sample results are below the GWPSs for each of the detected Appendix IV constituents. A summary of the detected Appendix IV constituents, background data, MCLs, 40 CFR 257.95(h)(2) RSLs, background concentrations, and GWPSs is attached as Table 1. Analysis was performed for all of the other Appendix IV constituents but none were detected. Based on these results, Appendix IV constituents in groundwater do not exceed the GWPSs. Sampling and analysis to demonstrate Appendix IV constituents do not exceed GWPS values has been completed within five years of closure initiation (40 CFR 257.102(f)(ii)).

CERTIFICATION

As required by 40 CFR 257.102(f)(3), I hereby certify that the groundwater monitoring concentrations at the Sibley Slag Settling Impoundment do not exceed the groundwater protection standards determined for the Impoundment pursuant to 40 CFR 257.95(h) for constituents listed in Appendix IV of 40 CFR 257. Based on acceptance of the certification of CCR removal (Attachment 2; without independent verification) and no exceedance of the groundwater protection standards, the Sibley Slag Setting Impoundment is now closed in accordance with the requirements of 40 CFR 257.102.



Attachments:

Table 1: Summary of Detected CCR Appendix IV Constituents and Corresponding GWPS Values

Attachment 1 - CCR Closure Plan, Sibley Slag Settling Impoundment, Sibley Generating Station

Attachment 2 - Certification of CCR Removal in Preparation of Closure by Removal of the Sibley Slag Settling Impoundment

TABLE 1

Summary of Detected CCR Appendix IV Constituents and Corresponding GWPS Values

TABLE 1
Summary of Detected CCR Appendix IV Constituents and Corresponding GWPS Values
Slag Settling Impoundment
Sibley Generating Station
Evergy Missouri West, Inc.

| Well Number | Sample Date | Detected Appendix IV Constituents | | | | | | |
|-------------------------------|------------------|-----------------------------------|---------------|-----------------|------------------|------------------|-------------------|-------------------------|
| | | Arsenic (mg/L) | Barium (mg/L) | Fluoride (mg/L) | Lead (mg/L) | Lithium (mg/L) | Molybdenum (mg/L) | Radium Combined (pCi/L) |
| MCL | | 0.010 | 2 | 4.0 | 0.015* | NA | NA | 5 |
| 40 CFR 257.95(h) RSL | | NA | NA | NA | 0.015* | 0.040 | 0.100 | NA |
| MW-701 Background Data | | | | | | | | |
| MW-701 | 12/14/2015 | 0.00286 | 0.180 | 0.106 | <0.002 | <0.015 | <0.005 | 0.305 |
| MW-701 | 2/17/2016 | 0.00280 | 0.177 | <0.100 | <0.002 | <0.015 | <0.005 | 0.459 |
| MW-701 | 5/26/2016 | 0.00339 | 0.189 | <0.100 | <0.002 | <0.015 | <0.005 | 2.853 |
| MW-701 | 8/23/2016 | 0.00236 | 0.180 | 0.110 | <0.002 | <0.015 | <0.005 | 0.291 |
| MW-701 | 11/10/2016 | 0.00250 | 0.184 | <0.100 | <0.002 | <0.015 | <0.005 | 1.731 |
| MW-701 | 2/8/2017 | 0.00224 | 0.177 | 0.105 | <0.002 | <0.015 | <0.005 | 0.098 |
| MW-701 | 5/3/2017 | 0.00260 | 0.188 | 0.116 | <0.002 | <0.015 | <0.005 | 0.391 |
| MW-701 | 8/1/2017 | 0.00483 | 0.186 | 0.130 | <0.002 | <0.015 | <0.005 | 0.997 |
| MW-701 | 10/3/2017 | 0.00249 | 0.184 | <0.100 | <0.002 | <0.015 | <0.005 | 0.073 |
| MW-701 PL/BG | | 0.00453 | 0.192 | 0.184 | 0.002 | 0.015 | 0.005 | 2.69 |
| GWPS | | 0.010 | 2 | 4.0 | 0.015 | 0.040 | 0.100 | 5 |
| MW-701 | 5/12/2020 | 0.00273 | 0.184 | <0.15 | <0.005 | <0.015 | <0.005 | 0.164 |
| MW-702 Background Data | | | | | | | | |
| MW-702 | 12/14/2015 | 0.00753 | 0.254 | 0.121 | <0.002 | <0.015 | <0.005 | 0.363 |
| MW-702 | 2/17/2016 | 0.00599 | 0.225 | 0.101 | <0.002 | <0.015 | <0.005 | 0.179 |
| MW-702 | 5/26/2016 | 0.00692 | 0.241 | 0.104 | <0.002 | 0.0184 | <0.005 | 0.967 |
| MW-702 | 8/23/2016 | 0.0104 | 0.263 | 0.106 | <0.002 | <0.015 | <0.005 | 0.153 |
| MW-702 | 11/10/2016 | 0.00534 | 0.245 | <0.100 | <0.002 | <0.015 | <0.005 | 1.185 |
| MW-702 | 2/8/2017 | 0.00452 | 0.237 | 0.113 | <0.002 | <0.015 | <0.005 | 0.995 |
| MW-702 | 5/3/2017 | 0.00734 | 0.288 | 0.111 | <0.002 | <0.015 | <0.005 | 0.596 |
| MW-702 | 8/1/2017 | 0.02410 | 0.348 | 0.127 | <0.002 | <0.015 | <0.005 | 1.020 |
| MW-702 | 10/3/2017 | 0.00852 | 0.276 | <0.100 | <0.002 | <0.015 | <0.005 | 0.000 |
| MW-702 PL/BG | | 0.0209 | 0.340 | 0.183 | 0.002 | 0.0184 | 0.005 | 1.52 |
| GWPS | | 0.0209 | 2 | 4.0 | 0.015 | 0.040 | 0.100 | 5 |
| MW-702 | 5/12/2020 | 0.00604 | 0.282 | <0.15 | <0.005 | 0.0152 | <0.005 | 0.202 |

TABLE 1
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Slag Settling Impoundment
Sibley Generating Station
Evergy Missouri West, Inc.

| Well Number | Sample Date | Detected Appendix IV Constituents | | | | | | |
|-------------------------------|------------------|-----------------------------------|---------------|-----------------|------------------|------------------|-------------------|-------------------------|
| | | Arsenic (mg/L) | Barium (mg/L) | Fluoride (mg/L) | Lead (mg/L) | Lithium (mg/L) | Molybdenum (mg/L) | Radium Combined (pCi/L) |
| MCL | | 0.010 | 2 | 4.0 | 0.015* | NA | NA | 5 |
| 40 CFR 257.95(h) RSL | | NA | NA | NA | 0.015* | 0.040 | 0.100 | NA |
| MW-703 Background Data | | | | | | | | |
| MW-703 | 12/14/2015 | 0.126 | 0.246 | 0.231 | <0.002 | <0.015 | <0.005 | 0.866 |
| MW-703 | 2/17/2016 | 0.259 | 0.275 | 0.424 | <0.002 | <0.015 | <0.005 | 0.186 |
| MW-703 | 5/26/2016 | 0.189 | 0.235 | 0.331 | <0.002 | 0.0185 | <0.005 | 3.421 |
| MW-703 | 8/23/2016 | 0.212 | 0.244 | 0.358 | <0.002 | <0.015 | <0.005 | 0.887 |
| MW-703 | 11/10/2016 | 0.186 | 0.252 | 0.318 | <0.002 | <0.015 | <0.005 | 1.159 |
| MW-703 | 2/8/2017 | 0.247 | 0.294 | 0.293 | <0.002 | <0.015 | <0.005 | 0.200 |
| MW-703 | 5/3/2017 | 0.122 | 0.326 | 0.245 | <0.002 | <0.015 | <0.005 | 1.160 |
| MW-703 | 8/1/2017 | 0.250 | 0.281 | 0.373 | <0.002 | <0.015 | <0.005 | 1.360 |
| MW-703 | 10/3/2017 | 0.199 | 0.266 | 0.245 | <0.002 | <0.015 | <0.005 | 0.385 |
| MW-703 PL/BG | | 0.301 | 0.328 | 0.411 | 0.002 | 0.0185 | 0.005 | 3.07 |
| GWPS | | 0.301 | 2 | 4.0 | 0.015 | 0.04 | 0.100 | 5 |
| MW-703 | 5/12/2020 | 0.177 | 0.269 | 0.263 | <0.005 | 0.0172 | <0.005 | 0.308 |
| MW-704 Background Data | | | | | | | | |
| MW-704 | 12/14/2015 | 0.00314 | 0.182 | 0.157 | <0.002 | <0.015 | 0.00914 | 1.401 |
| MW-704 | 2/17/2016 | 0.00289 | 0.155 | 0.155 | <0.002 | <0.015 | 0.00943 | 0.133 |
| MW-704 | 5/26/2016 | 0.00262 | 0.162 | 0.132 | <0.002 | 0.0157 | 0.00902 | 4.496 |
| MW-704 | 8/23/2016 | 0.00203 | 0.156 | 0.146 | <0.002 | <0.015 | 0.0101 | 0.469 |
| MW-704 | 11/10/2016 | <0.00200 | 0.159 | 0.170 | <0.002 | <0.015 | 0.00939 | 1.840 |
| MW-704 | 2/8/2017 | <0.00200 | 0.150 | 0.149 | <0.002 | <0.015 | 0.00824 | 0.181 |
| MW-704 | 5/3/2017 | 0.00206 | 0.155 | 0.142 | <0.002 | <0.015 | 0.00864 | 0.307 |
| MW-704 | 8/1/2017 | <0.00200 | 0.147 | 0.162 | 0.00338 | <0.015 | 0.00922 | 0.598 |
| MW-704 | 10/3/2017 | 0.00200 | 0.152 | 0.160 | <0.002 | <0.015 | 0.00773 | 1.300 |
| MW-704 PL/BG | | 0.00314 | 0.178 | 0.176 | 0.00338 | 0.0157 | 0.0104 | 4.38 |
| GWPS | | 0.010 | 2 | 4.0 | 0.015 | 0.040 | 0.100 | 5 |
| MW-704 | 5/12/2020 | 0.00203 | 0.154 | 0.191 | <0.005 | <0.015 | 0.00801 | 1.04 |

* EPA Action Level

CCR - Coal Combustion Residuals

GWPS - Groundwater Protection Standard

MCL - Maximum Contaminant Level

RSL - Regional Screening Level (adopted by 40 CFR 257.95(h)(2))

PL/BG - Prediction Limit / Background Level

mg/L - Milligrams per Liter

pCi/L - Picocuries per Liter

NA - Not Applicable

ATTACHMENT 1

CCR Closure Plan, Sibley Slag Settling Impoundment, Sibley Generating Station



CCR CLOSURE PLAN
Sibley Slag Settling Impoundment
Sibley Generating Station

33200 East Johnson Rd
Sibley, Missouri

KCP&L Greater Missouri Operations Company

October 14, 2016

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**SIBLEY GENERATING STATION
 SLAG SETTLING IMPOUNDMENT
 CCR CLOSURE PLAN
 REVISION HISTORY**

| Revision Number | Revision Date | Section Revised | Summary of Revisions |
|------------------------|----------------------|------------------------|-----------------------------|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Revisions are accomplished in accordance with Section 3.

SECTION 1

BACKGROUND

The purpose of this CCR Closure Plan (Plan) is to identify and describe the Coal Combustion Residuals Rule (CCR Rule) measures needed to close the Sibley Generating Station (Sibley) Slag Settling Impoundment consistent with recognized and generally accepted good engineering practices and in accordance with the CCR Rule. The following sections provide background information on the facility and related regulatory requirements.

1.1 Facility Information

Name of Facility: Sibley Generating Station

Name of CCR Unit: Slag Settling Impoundment

Name of Operator: Kansas City Power & Light Company (KCP&L)

Facility Mailing Address: 33200 East Johnson Rd., Sibley, MO 64088

Location: East of and adjacent to Sibley, Missouri

Facility Description: The Sibley Generating Station consists of three coal-fired units. CCR produced at the facility include Fly Ash, bottom ash as slag, and economizer ash. The bottom ash (slag) is sluiced to the Slag Settling Impoundment, then is moved by excavator to a concrete slab where it is loaded into trucks for beneficial use or transported to the landfill for disposal. Related facilities include groundwater monitoring systems, storm water management systems, and haul/access roads.

1.2 Regulatory Requirements

This plan has been developed for the Sibley Generating Station Slag Settling Impoundment in accordance with 40 CFR 257.102 (b). The CCR Rule requires preparation of a Closure Plan for all existing CCR landfills and surface impoundments in operation as of October 19, 2015, the effective date of the rule.

The owner or operator of a CCR unit must prepare a written closure plan that includes, at a minimum, the information specified in 40 CFR 257.102 (b) (1) (i) through (vi). These items and the section of this plan responsive to each follows:

40 CFR 257.102 (b) Written Closure Plan

(1) Content of the Plan

- (i) Narrative description of how the CCR unit will be closed in accordance with 40 CFR 257.102 (Section 2.1).
- (ii) If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with 40 CFR 257.102 (c). (Section 2.1).
- (iii) If closure of the CCR unit will be accomplished by leaving CCR in place, a description of the final cover system and methods and procedures used to install the final cover. The closure plan must also discuss how the final cover system will achieve the performance standards specified in 40 CFR 102 (d) (N/A).
- (iv) Estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit (Section 2.2).
- (v) Estimate of the largest area of the CCR unit ever requiring a final cover (N/A).
- (vi) Schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including major milestones and the estimated timeframes to complete each step or phase of CCR unit closure (Section 2.3).

Selected definitions from the CCR Rule are provided below.

Closed means placement of CCR in a CCR unit has ceased, and the owner or operator has completed closure of the CCR unit in accordance with § 257.102 and has initiated post-closure care in accordance with § 257.104.

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.

Surface Impoundment 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 Surface Impoundment 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.

Qualified Professional Engineer means an individual who is licensed by a state as a Professional Engineer to practice one or more disciplines of engineering and who is qualified by education, technical knowledge and experience to make the specific technical certifications required under this subpart. Professional engineers making these certifications must be currently licensed in the state where the CCR unit(s) is located.

SECTION 2

CLOSURE DESCRIPTION

This Plan describes the steps needed to close the Sibley Slag Settling Impoundment at any point during the active life of the unit in accordance with the CCR Rule and recognized and generally accepted good engineering practices. Plan items required under the CCR Rule described in this section fall into the general categories of Closure Description, Volume Estimates, and Closure Schedule. This initial or any subsequent Plan may be amended pursuant to 40 CFR 257.102 (b) (3) at any time as discussed in Section 5. The current plan is to close the unit by removal of CCR.

2.1 Closure Description

2.1.1 Description

The Sibley Slag Settling Impoundment was constructed as an incised impoundment. Closure will be accomplished through removal of CCR. The CCR material contained in the unit will be dewatered as necessary, removed, and either beneficially used or disposed in the on-site CCR Landfill.

2.1.2 Construction Procedures

CCR will be removed primarily by mechanical excavation using earth-moving equipment. CCR will be allowed to dewater by gravity drainage and evaporation. The impoundment will be decontaminated by removal of the CCR and will be considered complete when constituent concentrations throughout the CCR unit, if detected, have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard for constituents listed in Appendix IV to 40 CFR 257.

2.2 Volume Estimates

The estimated maximum inventory of CCR and impounded water ever planned on-site over the active life of the CCR unit is approximately 67,655 cubic yards.

2.3 Closure Schedule

The size of area and time of year closure construction takes place will vary, therefore closure construction schedules will vary. The schedule provided in this section is therefore a general estimation.

2.3.1 Commencement of Closure

Commencement of final closure has occurred if placement of waste in the surface impoundment has ceased and any of the following actions or activities has been completed (40 CFR 102 (e) (3)):

- (i) Steps necessary to implement this closure plan;
- (ii) Submittal of a completed application for any required state or agency permit or permit modification; or
- (i) Steps necessary to comply with any state or other agency standards that are a prerequisite, or are otherwise applicable, to initiating or completing the closure.

There are three regulatory timeframes within which a unit may be required to close:

- (i) In accordance with 40 CFR 257.102 (e) (1), a surface impoundment has 30 days after the date the unit receives the *known* final receipt of waste, either CCR or non-CCR waste stream; or removes the *known* final volume of CCR from the CCR unit for the purpose of beneficial use of CCR.
- (ii) In accordance with 40 CFR 257.102 (e) (2), for idled units with additional capacity that expect to resume CCR or non-CCR waste disposal operations, or CCR removal operations for beneficial use, closure must be initiated within two years unless a written demonstration prepared in accordance with 40 CFR 257.102 (e) (2) (ii) is placed in the unit's operating record, which would provide an additional two year extension(s).
- (iii) In accordance with 40 CFR 257.102 (e) (4) surface impoundment closures due to groundwater exceedances or technical siting criteria (i.e. location in an unstable area), closure must be initiated within six months.

Extensions to complete the closure activity may be allowed under 40 CFR 257.102 (f) (2).

2.3.2 Closure Schedule

The milestones and the associated timeframes in this section are initial estimates. Some of the activities associated with the milestones will overlap.

Estimated Closure Schedule

| | |
|---|--|
| Written Closure Plan | October 17, 2016 |
| Notification of Intent to Close Placed in Operating Record | No later than the date closure of the CCR unit is initiated. Closure will commence per applicable timeframes in 40 CFR 257.102 (e). ¹ |
| Initiation of Closure / Coordinating with and obtaining necessary approvals and permits from other agencies | Year 1 – 5 |
| Mobilization | Year 1 |
| Dewater and remove CCR | Year 1 - 5 |
| Year all closure activities for the CCR unit will be completed | Year 1 - 5 ² |

Notes

1. Initiation of Closure may be extended for multiple two year periods in accordance with 40 CFR 257.102 (e) (2) (ii) and (iii).
2. Final closure of Surface Impoundments must be completed within five years of commencing closure unless a demonstration is placed in the operating record document (40 CFR 257.102 (f) (2)).

SECTION 3

AMENDMENT OF CCR CLOSURE PLAN

This owner or operator may amend the initial or any subsequent written closure plan developed pursuant to 40 CFR 257.102 (b) (1) at any time.

The Plan must be amended whenever:

- There is a change in the operation of the CCR unit that would substantially affect the written closure plan in effect; or
- Before or after closure activities have commenced, unanticipated events necessitate a revision of the written closure plan.

The written closure plan must be amended at least 60 days prior to a planned change in the operation of the facility or CCR unit, or no later than 60 days after an unanticipated event requires the need to revise an existing written closure plan. If a written closure plan is revised after closure activities have commenced for a CCR unit, the current closure plan must be amended no later than 30 days following the triggering event.

A written certification from a qualified professional engineer that the initial and any amendment of the written closure plan meets the requirements of § 257.102 (b) must be obtained.

Plan changes will be documented using the Revision History which prefaces this Plan. Substantial changes to this plan will be certified by a Qualified Professional Engineer.

SECTION 4

ENGINEERING CERTIFICATION

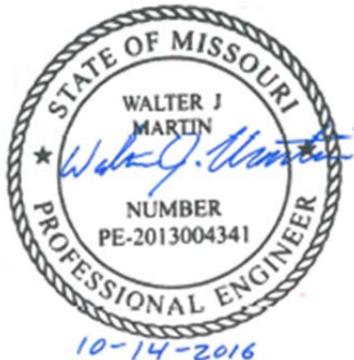
Pursuant to 40 CFR 257.102 (b) (4) and by means of this certification, I attest that:

- (i) I am a Qualified Professional Engineer licensed in the State of Missouri;
- (ii) I am familiar with the requirements of the CCR Rule (40 CFR 257);
- (iii) I, or my agent, have visited and examined the Sibley Generating Station Slag Settling Impoundment;
- (iv) I do hereby certify to the best of my knowledge, information, and belief that this Closure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the CCR Rule;
- (v) this CCR Closure Plan meets the requirements of 40 CFR 257.102 (b); and
- (vi) the pages certified herein include Pages i, ii, 1 through 7, altogether a total of 9 pages in a protected Adobe™ document.

Walter J. Martin, P.E.

Printed Name of Qualified Professional Engineer
1200 Main St, Kansas City, MO 64105, 816-556-2200

P.E. SEAL, STATE OF MISSOURI



ATTACHMENT 2

Certification of CCR Removal in Preparation of Closure by Removal of the Sibley Slag Settling Impoundment

Memorandum



Date: August 27, 2020

To: Jared Morrison, Director Water and Waste Programs
Eversource Energy, Inc. (f/k/a Kansas City Power & Light Co., Inc.)

From: Kira Wylam, Burns & McDonnell

Subject: Certification of CCR Removal in Preparation of Closure by Removal of the Sibley Slag Settling Impoundment

This memorandum presents the results of construction observation and documentation performed by Burns & McDonnell (BMcD) following the removal of coal combustion residuals (CCR) from the Slag Settling Impoundment (referred to herein as “Impoundment”) at the Sibley Generating Station (Station). This CCR surface impoundment is subject to Federal Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments per 40 CFR 257 Subpart D and is operated by Eversource Energy, Inc. (Eversource) and owned by Eversource Missouri West, Inc.

A document titled “Notification of Intent to Close” was submitted to the CCR Operating Record on January 28, 2020. This was communicated to the Missouri Department of Natural Resources on February 27, 2020.

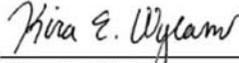
Eversource retained Kissick Construction to remove ponded slag waste from the Station’s Impoundment through the method of excavation. Eversource retained BMcD as certifying engineer to certify that, upon completion of construction, the CCR in the Impoundment has been removed in accordance with Section 2.1 of the October 14, 2016 document titled, *CCR Closure Plan, Sibley Slag Settling Impoundment, Sibley Generating Station*, which is referred to herein as “Closure Plan”. It is BMcD’s opinion that removal of CCR material from the Impoundment was performed in accordance with the Closure Plan and the CCR removal requirement of 40 CFR 257.102(c) for reasons described herein. Removal of CCR was completed within five years of initiation of closure.

The Impoundment is underlain with a concrete layer which provided a clear delineation between the slag material and the bottom of the Impoundment. A representative from BMcD observed removal of slag waste from the Impoundment; and the BMcD certifying engineer witnessed through visual observation during an onsite inspection on May 8, 2020, that the slag material had been removed. Removal of CCR from the Impoundment is herein certified as complete. Photographs taken at the time of the inspection are attached to this memorandum.

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CERTIFICATION

As required by 40 CFR 257.102(f)(3), I hereby certify that removal of CCR from the Slag Settling Impoundment at the Sibley Generating Station was completed in accordance with the written closure plan as defined by 40 CFR 257.102(b) and the CCR removal requirement of 40 CFR 257.102(c).



Kira E. Wylam

8/27/2020
Date



Aug 27 2020 4:03 PM

KEW/kew

Attachment – Photographs

Attachment - Photographs

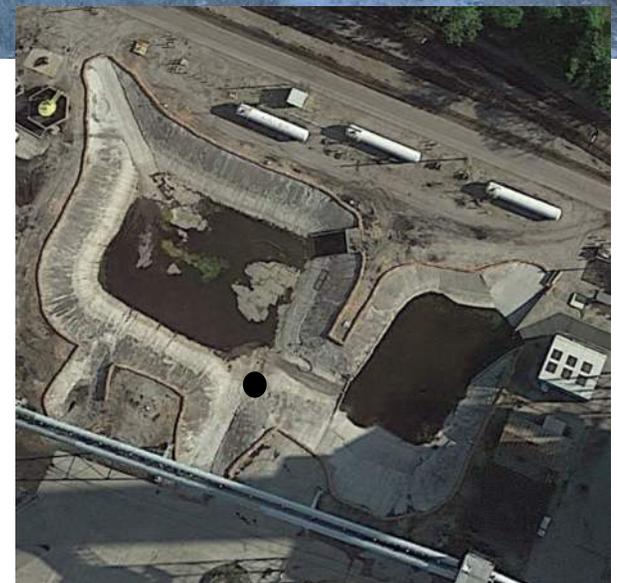
(Looking South-East)



(Looking North-West)



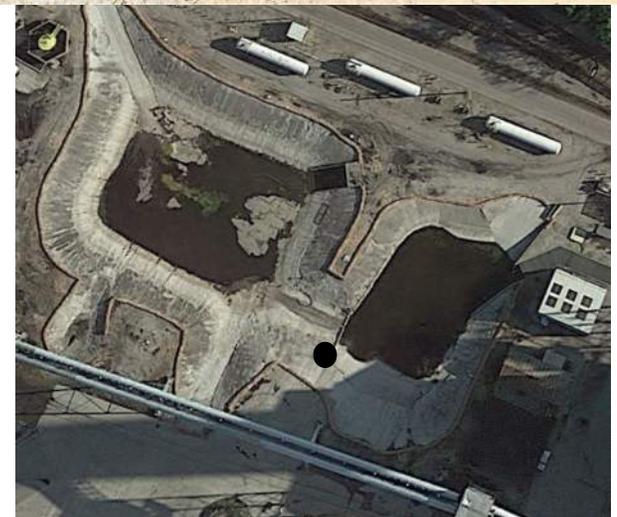
* Closer visual inspection (unable to be documented properly on film) showed that standing water contained algae but no CCR



(Looking North-East)



* Closer visual inspection (unable to be documented properly on film) showed that standing water contained algae but no CCR



(Looking East)



* Closer visual inspection (unable to be documented properly on film) showed that standing water contained algae but no CCR

