



**2020 ANNUAL CCR FUGITIVE
DUST CONTROL REPORT**

TECUMSEH ENERGY CENTER

5530 SE 2nd St, Tecumseh, Kansas

December 11, 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 (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 Tecumseh Energy Center (TEC). The following sections provide background information on the facility, CCR, and related regulatory requirements.

1.1 Facility Information

Name of Facility:	Tecumseh Energy Center (TEC)
Name of Operator:	Evergy Kansas Central, Inc (Evergy)
Operator Mailing Address:	5530 SE 2 nd Street, Tecumseh, Kansas 66542
Location:	2 miles north of Highway 70 and resides in Sections 31, Township 11 South, and Range 17 East.
Facility Description:	Evergy, Inc operated the TEC, located in Tecumseh, Kansas until 2018. This facility has undergone decommissioning and no longer has any active coal fired units. The plant formerly consisted of two operational coal-fired electric generating units. Coal Combustion Residuals (CCR) associated with burning coal included bottom ash, economizer ash, and fly ash. CCR were disposed in an on-site active combustion byproduct landfill located on TEC property. This combustion byproduct landfill is permitted under Kansas Department of Health and Environment (KDHE), Bureau of Waste Management (BWM), Permit No. 322.

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 Tecumseh Energy Center 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 specifically requires owners or operators of CCR facilities must 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 continues to follow the relevant practices described in the Tecumseh Energy Center CCR Fugitive Dust Control Plan. 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 this section of the CCR Rule, this report has been developed and placed into the CCR operating record on December 11, 2020.

2.0 CCR Fugitive Dust Controls

Potential CCR fugitive dust sources at the site generally included loading, unloading, transportation in trucks or on conveyors, stockpiles, vehicle traffic, and landfill placement. These general sources are categorized for TEC for the purposes of CCR fugitive dust management as follows:

- (1) Temporary Storage Areas
- (2) CCR Impoundments
- (3) CCR Landfill Units
- (4) Haul Roads

Between December 2019 and December 2020, the Tecumseh Energy Center implemented dust control measures and actions as follows.

2.1 Temporary Storage Areas

TEC no longer has any active temporary storage areas. All site permanent structures have been removed as a part of the decommissioning process.

When the facility was in operation, fly ash and economizer ash (a different fraction of the fly ash generated at the plant) were initially collected within enclosed structures at the plant. Fly ash was pneumatically conveyed into a silo then loaded into enclosed trucks for either off-site beneficial use or disposal at the on-site landfill. Economizer ash was initially stored in an enclosed bin on-site. This material was then disposed of in the onsite landfill. However, this was not applicable for these areas in 2019 & 2020 since the plant ceased formal operations in 2018.

2.2 CCR Impoundments

Evergy has no active CCR surface impoundments at TEC.

Evergy, historically, operated one CCR surface impoundment at TEC. This impoundment consisted of two cells which were used to temporarily store sluiced bottom ash. Closure of this unit was completed October 9, 2018 per notice provided to the Kansas Department of Health and Environment (KDHE).

2.3 CCR Landfills

There is one CCR landfill at TEC, consisting of three inactive cells, which is in a final closure process.

When in operation, CCR was placed onto the ground from haul trucks using minimal drop heights. The CCR material collected was conditioned via water truck as the material was placed or at a minimum on the same day as placement to develop a surficial crust to prevent fugitive dust. CCR was not placed during periods when winds are above 15 miles per hour. Drivers attempted to avoid driving on active areas of the landfill and drove on Evergy-directed travel paths to avoid area agitation.

2.4 Haul Roads

Due to decommissioning, both paved and unpaved roads no longer carry CCR material to the landfill. However, paved roads at the facility were cleaned and maintained, as needed. Posted speed limits were enforced during transport to limit mobilization. Hauler equipment was maintained in proper condition to minimize leaking/maintain normal operations. All spilled or deposited material was cleaned in a timely manner.

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 TEC or Evergy between December 2019 and December 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 the Tecumseh Energy Center. Evergy found the measures in place were effective, and no changes or corrective measures were necessary during the period from December 2019 to December 2020.