REVISION 1

CCR FUGITIVE DUST CONTROL PLAN
NEARMAN CREEK POWER STATION

Kansas City, Kansas

B&V PROJECT NO. 190719
B&V FILE NO. 41.0403

PREPARED FOR

KANSAS CITY BPU
THE POWER OF COMMUNITY

Kansas City Board of Public Utilities

12 DECEMBER 2017

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Certification

I hereby certify, as a Professional Engineer in the state of Kansas, that this CCR Fugitive Dust Control Plan meets the requirements of 40 C.F.R. 257.80.

Frederick H. Freeland, P.E. (Kansas 8651)
Black & Veatch Corporation
Date: 12 December, 2017

1.0 EXECUTIVE SUMMARY

This document presents the Fugitive Dust Control Plan for the Kansas City Board of Public Utilities (KCBPU) Nearman Creek Power Station in Kansas City, Kansas in compliance with 40 CFR §257.80. This document is an amended report based on the October 2015 Plan prepared by Burns & McDonnell Engineering Company, Inc. The amendments to this plan reflect changes to the Flue Gas Desulfurization (FGD) ash handling system.

This plan includes:

- Identification and description of CCR fugitive dust control measures for the site (§ 257.80(b)(1)
- Procedures to log citizen complaints received by the owner or operator involving Coal Combustion Residual (CCR) fugitive dust events at the facility § 257.80(b)(3)
- Description of procedures the owner or operator will follow to periodically assess the effectiveness of the control plan § 257.80(b)(4)

This plan is in addition to and does not supersede any other applicable permits, environmental standards, or work safety practices.

2.0 FUGITIVE DUST SOURCES AND CONTROL MEASURES

The Facility is a single, coal-fired unit nameplated at 268 MW. KCBPU is a wholly owned administrative agency of the Unified Government of Wyandotte County. CCR produced at the Facility includes FGD ash and bottom ash. FGD ash generated by the Facility is transported offsite for beneficial use or landfill. Bottom ash is handled wet and managed in an onsite CCR surface impoundment. In addition to the control measures outlined in this Plan, KCBPU adheres to controls and Best Management Practices that are required and outlined in other applicable site permits and plans. Table 2-1 lists the potential CCR fugitive dust emission sources identified at the Facility, briefly describing operations at each source.

Table 2-1: CCR Fugitive Dust Sources

SOURCE NAME	DESCRIPTION
Bottom Ash Handling	Sluiced to CCR surface impoundment for management
FGD Ash Handling	Handled dry and transported pneumatically to silo for unloading. Ash is trucked offsite for beneficial use or landfill.
Access & Haul Road	Transport road around the CCR surface impoundment
CCR Surface Impoundment	Management area for wet sluiced bottom ash

2.1 BOTTOM ASH HANDLING

Bottom ash is handled wet and sluiced to the CCR surface impoundment at the Facility. Since the ash is sluiced in a wet condition via pipeline to the CCR surface impoundment, there are no potential CCR fugitive dust emissions sources in the handling of bottom ash at the Facility, both at the source of the bottom ash and at the discharge point within the CCR surface impoundment. Bottom ash sluiced to this impoundment is ultimately removed and hauled offsite for beneficial use. Dust control measures at the CCR surface impoundment are discussed in Section 2.4.

2.2 FGD ASH HANDLING

FGD ash is pneumatically transported from the bottom of the Pulse Jet Fabric Filter (PJFF) and temporarily stored in a silo at KCBPU until hauled to a landfill or beneficial use application. All FGD ash is either wetted via pugmill or unloaded dry with a telescopic chute, with over-suction, minimizing any fugitive dust emissions. The telescopic chute lowers into haul trucks. The haul trucks are loaded inside the soli structure which has the ability to be fully enclosed from the outside environment with overhead doors. All haul trucks are enclosed. FGD ash handling dust control measures are described in Table 2-2.

Table 2-2: FGD Ash Control Measures

CONTROL/ACTIVITY	DESCRIPTION
General Silo Controls	Storage silo is equipped with a bin vent filter.
Dry Unloading	The dry unloading process includes telescopic chutes that lower into haul trucks to minimize material fall distance. The loading chute has over-suction to minimize fugitive dust emissions during unloading. FGD silo is equipped with overhead doors with the ability to fully enclose haul trucks from outside wind when being loaded. Tanker trucks are enclosed.

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2.3 ACCESS AND HAUL ROAD

The Facility has an access road leading from the generating unit to the CCR surface impoundment. The road at the surface impoundment is gravel, and used by plant personnel for access during normal daily operations and weekly inspections. Trucks only utilize this access road to perform maintenance activities as needed, or to intermittently transport bottom ash offsite when it is removed from the CCR surface impoundment. Dust control measures are described in Table 2-3.

Table 2-3: Access and Haul Road Control Measures

CONTROL/ACTIVITY	DESCRIPTION
Access and Haul Roads	Access and haul roads at the surface impoundment have speed limit signs posted to lower potential for fugitive dust emissions. Roads are used to perform maintenance and inspection activities as needed.

2.4 CCR SURFACE IMPOUNDMENT

Bottom ash is sluiced to the CCR surface impoundment. The majority of bottom ash on-site is removed intermittently and hauled from the CCR surface impoundment offsite for beneficial use. Dust control measures for the CCR surface impoundment are described in Table 2-4.

Table 2-4: CCR Surface Impoundment Control Measures

CONTROL/ACTIVITY	DESCRIPTION
Wet Sluicing	Material is sluiced in a wet condition and placed in the CCR surface impoundment. Generally there are no fugitive dust issues near the CCR surface impoundment.

3.0 PROCEDURES FOR LOGGING CITIZEN COMPLAINTS

The CCR Rule requires owners and operators of all active CCR units to develop and implement formal procedures to log citizen complaints involving CCR fugitive dust events. These complaints must, then, be included as part of the annual CCR Fugitive Dust Control Report. This annual report must be placed in the Facility's written operating record and on KCBPU's publicly accessible CCR internet site.

Each time a complaint is received, the Environmental Director will work with plant personnel to initiate an investigation of the source of the CCR fugitive dust and an evaluation of the controls in place for the particular area or process identified as the cause of the problem. If the event is random and due to high winds or abnormal operating conditions, plant personnel may implement a short-term solution, which does not require an amendment of this Plan. If the issue is determined to be one that may be continuous or may reoccur in the future, plant personnel and the Environmental Director will reevaluate controls within the plan to determine if an amendment to the Plan needs to be made. KCBPU shall log citizen complaints as received on the log form in Appendix A.

Citizens, groups, or agencies who wish to make a CCR fugitive dust complaint may do so by sending an email via the Citizen Complaints -"Contact Us" link posted on the KCBPU CCR Rule Compliance Data & Information website.

4.0 PERIODIC ASSESSMENT/AMENDMENT OF THE PLAN

KCBPU may amend this Plan at any time in accordance with the CCR Rule. KCBPU must amend the Plan whenever there is a change in conditions that would substantially affect the Plan, such as the construction and operation of a new CCR unit. The Plan and any subsequent amendments must be certified by a qualified professional engineer.

In addition to Plan evaluation following citizen complaints, KCBPU commits to a detailed assessment and evaluation of the effectiveness of the overall Plan on an annual basis, during preparation of the annual CCR Fugitive Dust Control Report. In addition to annual assessment, KCBPU performs inspections and monitors CCR fugitive dust through the weekly inspections and shall mitigate any potential issues noted during these inspections.

5.0 ANNUAL REPORT

KCBPU is required 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.

The initial CCR Fugitive Dust Control Report must be completed no later than 14 months after placing the initial CCR Fugitive Dust Control Plan in the Facility's written operating record. The deadline for completing a subsequent annual report is one year after the date of completing the previous annual report. The annual CCR Fugitive Dust Control Report is complete when such Report has been placed in the Facility's operating record.

Appendix A
Citizen Complaint Log

Date	Plaintiff Location, Group, or Affiliation	Nature of Complaint	Action Taken to Mitigate Fugitive Emission