

Annual CCR Fugitive Dust Control Report

Waukegan Generating Station

401 East Greenwood Avenue, Waukegan, Illinois

1.0 Introduction

On December 19, 2014, the administrator of the U.S. Environmental Protection Agency signed the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities final rule (the Rule). The Rule was published in the Federal Register on April 17, 2015 and became effective on October 19, 2015. The Rule establishes a set of requirements for the disposal of CCR in landfills and surface impoundments at coal-fired power plants under Subtitle D of the Resource Conservation and Recovery Act. These requirements include air criteria specified in Title 40 of the Code of Federal Regulations, §257.80, to address the potential pollution caused by windblown dust from CCR units.

The Waukegan Generating Station, operated by Midwest Generation, LLC (MWG), is located at 401 East Greenwood Avenue, Waukegan, Lake County, Illinois. The facility retired its coal-fired electric power generating units in 2022 and currently operates oil-fired electric power generating units. The station occupies approximately 200 acres. There are currently two coal-fired units, Units 7 and 8, that ceased coal-burning operations in May 2022. There are four peaker units at the site, fired by fuel oil. Electrical power is transmitted from the site to the area grid through overhead transmission power lines. The Rule applies to this facility due to the management of CCR that was generated from the combustion of coal. CCR units associated with the station are the East Ash Pond and West Ash Pond.

According to the Rule, owners or operators of CCR units must adopt measures that will effectively minimize CCR from becoming airborne at the facility by developing and operating in accordance with a Fugitive Dust Control Plan (Plan) with adequate dust control measures. In this regard, a Plan was prepared that complies with the requirements as specified in §257.80(b)(1-7) of the Rule and placed in the Waukegan facility's operating record on October 19, 2015 per §257.105(g)(1). As required, the Plan was also noticed to the State Director per §257.106(g)(1) and posted to the publicly accessible internet site per §257.107(g)(1).

In addition to the above and per §257.80(c), an Annual Fugitive Dust Control Report (Annual Report) must be completed that includes the following:

- Description of actions taken to control CCR fugitive dust
- Record of all citizen complaints
- Summary of any corrective actions taken

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The Annual Report must be completed no later than one year after completion and placement of the previous Report in the facility's operating record. This document represents the 2024 Annual Report for Waukegan and will be appropriately placed in the facility's operating record per §257.105(g)(2), noticed to the State Director per §257.106(g)(2), and posted to the publicly accessible internet site per §257.107(g)(2).

2.0 Actions Waukegan Station Takes to Control CCR Fugitive Dust

As detailed in the facility's CCR Fugitive Dust Control Plan and reiterated below, the station has established procedures and inspection requirements which are implemented to minimize/eliminate airborne emissions from the potential fugitive dust sources. The results from inspections conducted and associated observations made during CCR handling activities are documented on logs maintained in the station's Environmental Department.

2.1 West Ash Pond and East Ash Pond

The East Ash Pond is filled with water, thereby suppressing any potential fugitive dust emissions. The West Ash Pond had been dewatered and dredged, with de minimus amounts of CCR and subsequent stormwater accumulation remaining. When the ponds need to be dewatered and the sediment removed off site to a licensed landfill, there is the potential for this material to become airborne especially during excessively dry and windy conditions. Loading of this material under these conditions also has the potential for generating fugitive dust. Dewatered ponds are assessed on a quarterly basis or more frequently during excessively dry and windy conditions. To minimize fugitive dust emissions from exposed dry bottom ash and slag, the height of the staged material is minimized and the material piles are either sprayed with water or covered. Loading activities also are limited during such occasions. Haul trucks are covered with tarps once they have been loaded.

No CCR was removed from the ash ponds during the reporting period.

2.2 Maintenance Storage Area

The roll-off boxes in the Maintenance Storage Area only periodically contain bottom ash and slag, fly ash and other ash-related materials generated from decommissioning activities. Typically, the bottom ash and slag was in a wet state when placed into the containers but fly ash was in a dry state. When the roll-off boxes were filled, the material was promptly removed to an off-site licensed facility. The Maintenance Storage Area was assessed on a quarterly basis or more frequently during excessively dry and windy conditions. If ash material was observed

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outside a roll-off box, it was collected and placed into the container. All roll-off boxes were covered while staged in the Maintenance Storage Area and during removal off site. With the retirement of Units 7 and 8, the Maintenance Storage Area was used infrequently during decommissioning activities.

2.3 Ash Transport Roadways

During CCR hauling activities, truck drivers are instructed on the proper procedure for cleaning trucks and roll-off boxes before removal and a vehicle speed limit is enforced at the facility. Ash material that may not have been adequately removed from the trucks or roll-off boxes has the potential to become airborne and ultimately be deposited on haul roads. To minimize fugitive dust emissions, these roads are assessed on a quarterly basis and any observed accumulated ash material is promptly cleaned up and collected for off-site removal to a licensed landfill.

3.0 Fugitive CCR Dust Assessments

Pursuant to 40 CFR 257.80(b)(4), assessments of the potential fugitive dust emission sources identified in the Waukegan facility's CCR Fugitive Dust Control Plan (Plan) are conducted to assess the effectiveness of the Plan. The assessment includes observation of ash removal from ponds, temporary storage and transport activities at the facility to confirm the adequacy of the control measures. The assessments are conducted on a quarterly basis by an individual designated by the contact identified below. Observations made during each assessment will be recorded on a form similar to the one included in Appendix B of the Waukegan facility's CCR Fugitive Dust Control Plan.

If the results of the assessment determine that ash-related equipment has malfunctioned or the integrity of the equipment has been compromised, the necessary repairs or replacement will be performed as soon as feasible. If the assessment finds that the Plan does not effectively minimize the CCR from becoming airborne, the Plan will be amended to include additional control measures. No issues were identified during this Annual Report's period of record covering November 2023 through November 2024.

Owner Representative/Responsible Person Contact Information:

Mr. Phillip Raush
Plant Manager
815-207-5412

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4.0 Record of Citizen Complaints

Per the Rule, this Annual Report must include a record of all citizen complaints that were received by the Waukegan station with regard to fugitive dust emission incidents. In line with established protocols and within 24 hours of receipt, the station's environmental coordinator enters the citizen complaint into MWG's Environmental Management Information System (EMIS) database. The EMIS database would then automatically forwards notice of the complaint to the station manager and MWG's corporate environmental department. Following initial evaluation of the complaint, MWG would then conducts a thorough investigation to confirm the reported incident/conditions and implement corrective actions as may be warranted.

No complaints were registered during this Annual Report's period of record covering November 2023 through November 2024.

5.0 Summary of Corrective Actions Taken

For the November 2023 to November 2024 period of record, and based on continued monitoring and inspections as outlined in Section 2.0 and 3.0 and as required under the CCR rules, the established control measures remain effective in minimizing potential fugitive dust emissions. Moreover, this assertion is further validated by the lack of citizen complaints logged over this same period. Accordingly, no corrective actions were required during the past year.