

CCR COMPLIANCE FUGITIVE DUST CONTROL PLAN

**Midwest Generation, LLC
Waukegan Generating Station
401 East Greenwood Avenue
Waukegan, Illinois**

PREPARED BY:

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414 Plaza Drive, Suite 106
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March 2, 2026

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1.0 INTRODUCTION

On April 17, 2015, the United States Environmental Protection Agency published a final rule regulating coal combustion residuals (CCR) as part of 40 CFR 257 (the Federal CCR Rule). On April 15, 2021, the Illinois Environmental Protection Agency adopted a 35 Ill. Adm. Code 845 (the Illinois CCR Rule) promulgating statewide standards for the disposal of CCR (created by the generation of electricity by coal-fired power plants) in surface impoundments. Both 40 CFR 257 and 35 Ill. Adm. Code specifically require that “the owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit (surface impoundment), must adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units (surface impoundments), roads, and other CCR management and material handling activities”. As a result, each regulated facility must develop a CCR fugitive dust control plan that complies with 40 CFR 257.80 and 35 Ill. Adm. Code 845.500(b). It should be noted that 40 CFR Part 257 also regulates CCR landfills but 35 Ill. Adm. Code only regulates CCR surface impoundments.

This site-specific Fugitive Dust Control Plan (Plan) has been developed to comply with the requirements specified in both 40 CFR 257.80 and 35 Ill. Adm. Code 845.500. In general, the Plan identifies the potential CCR fugitive dust sources and describes the control measures that will be implemented to minimize CCR fugitive dust emissions. The Plan also includes a procedure for the periodic assessment of the Plan’s effectiveness, documentation of any Plan amendments deemed necessary to assure continued compliance, a record of any citizen complaints received pertaining to CCR fugitive dust emissions, and an outline of the required reporting and recordkeeping requirements in both regulations.

This Plan has been revised to reflect the current conditions at the facility.

2.0 SITE INFORMATION

2.1 Owner/Operator and Address:

Midwest Generation, LLC
Waukegan Generating Station
401 East Greenwood Avenue
Waukegan, Illinois

2.2 Owner Representative/Responsible Person Contact Information:

Plant Manager
815-207-5412

2.3 Location and Description of Facility Operations

The Midwest Generation Waukegan Generating Station is located at 401 East Greenwood Avenue, Waukegan, Lake County, Illinois. The facility retired its two coal-fired electric power generating units (7 and 8) in May 2022 and currently operates four fuel oil-fired electric power generating peaker units. The station occupies approximately 200 acres. Electrical power is transmitted from the site to the area grid through overhead transmission power lines.

The general vicinity includes other commercial/industrial facilities, limited residential development and Lake Michigan.

3.0 POTENTIAL FUGITIVE DUST SOURCES

Potential fugitive dust sources associated with the bottom ash and slag and fly ash systems have been identified at the facility; however, some of these are regulated by the facility's air operating permit and are adequately addressed within the required fugitive dust operating program. The potential CCR fugitive dust sources generally include exterior ash distribution systems, temporary ash storage locations, ash bulk loading/unloading operations and ash truck transportation routes; however, some of these operations are no longer occurring since the retirement of the coal-fired units in 2022. Fugitive dust could potentially be generated from these sources as a result of equipment malfunctions, wind erosion, housekeeping issues and/or the nature of the operation. Specifically, these identified sources were further evaluated to determine the probability of CCR fugitive dust being generated and to determine the level of emission controls that are warranted to mitigate fugitive dust emissions. The findings of the evaluation are individually discussed in the following sections.

3.1 Bottom Ash and Slag Distribution System

Collected bottom ash and slag in the boilers was transported as a liquid mixture through an enclosed piping system to the East Ash Pond, which has since been disconnected due to the cessation of coal-burning power generating activities on site. The West Ash Pond has ceased acceptance of CCR and non-CCR waste streams. When in service, a breach in the exterior piping could result in the accidental release of bottom ash and slag and potential fugitive dust emissions if the material were to accumulate and dry out. With the retirement of Units 7 and 8, sluicing of bottom ash and slag ceased in 2022.

3.2 West Ash Pond and East Ash Pond

The East Ash Pond no longer receives CCR and non-CCR waste streams but has yet to be dredged. However, the East Pond retains a level of precipitation water that is below a drain that is approximately eight inches above the absolute pond bottom. These conditions will remain until closure is initiated. The West Ash Pond has been dewatered and dredged and only the warning layer and de minimis amounts of CCR remain within the pond footprint. If dredging is necessary, the pond will be dewatered and the dredged material allowed to dry. When the material is suitable for transport, it will be loaded into open top trucks, covered and sent off site to a licensed landfill. Potential fugitive dust emissions could occur if dry bottom ash and slag residual is exposed or loaded during excessive windy and dry weather conditions.

3.3 Fly Ash Handling Equipment

Collected fly ash in the precipitator hoppers was initially transported in a closed vacuum piping system to a cyclone and bag filter where it was mechanically separated from the air stream within an enclosed building. Fly ash was then sent

to the fly ash silos through exterior piping. At the silos, the fly ash was drop loaded into trucks through a drop chute. The loading of fly ash occurred within a partially enclosed structure. After the trucks containing fly ash had been loaded, they proceeded to a nearby platform to allow the truck driver to secure the truck and to broom sweep any residual fly ash remaining on the truck. This entire process is covered by the fugitive dust operating program for the facility; however, with the retirement of Units 7 and 8, fly ash handling operations ceased in 2022.

3.4 Maintenance Storage Area

When bottom ash and slag and fly ash were generated as a result of routine ash-related equipment maintenance, the materials were temporarily stored in dedicated roll-off boxes in the Maintenance Storage Area. The materials were placed within the lined roll-off boxes until the container was full. The roll-off boxes were covered and transported to a licensed landfill. Any material that accumulated outside the roll-off box or dry material in an uncovered container that was exposed to excessive windy and dry weather conditions had the potential for becoming fugitive dust emissions. However, these operations ceased in 2022.

3.5 Ash Transport Roadways

Both gravel covered and asphalt paved roads within the facility may be used by trucks hauling both bottom ash and slag and fly ash to off-site landfills as well as by other vehicles entering and exiting the facility. Fugitive CCR dust emissions could occur during transit if the roll-off boxes are not covered and secured, if ash material is not properly cleaned from the boxes and trucks, or if there is a release of ash material due to a malfunction or accident. However, ash is not currently being transported.

3.6 Old Pond

The Old Pond is a historic area of unconsolidated CCR fill that was used to dewater CCR. The area is a grassy field that has not been in use since the 1970s. Potential fugitive dust emissions could occur if the CCR residual is exposed via excavation.

These potential fugitive dust sources are identified on the Site Diagram included in Appendix A.

4.0 DESCRIPTION OF CONTROL MEASURES

4.1 Purpose

The purpose of developing appropriate control measures is to minimize and reduce the emissions of CCR fugitive dust from the identified potential emission sources. The control measures and work practices implemented at the facility are described in the following sections.

4.2 Bottom Ash and Slag Distribution System

When the coal-fired units were operating, bottom ash and slag was in a liquid mixture within a closed system until the point of discharge at the East Ash Pond. Since the retirement of Units 7 and 8, sluicing of bottom ash and slag ceased in 2022 and no further fugitive dust control measures are required.

4.3 West Ash Pond and East Ash Pond

During normal operations, the East Ash Pond retains a portion of precipitation water that has a suppressing effect on any potential fugitive dust emissions. The West Ash Pond has been dewatered and dredged and only the warning layer and de minimis amounts of CCR remain within the pond footprint. If dredging is necessary, the pond will be dewatered and the sediment removed off site to a licensed landfill. While the bottom ash and slag residue is drying, 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 will be 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 will be minimized and the material piles will be either sprayed with water or covered. Loading activities also will be limited during such occasions. Haul trucks would be covered with tarps once they have been loaded.

4.4 Ash Handling Equipment

When the coal-fired units were operating, fly ash from the mechanical separators was sent to the silos within enclosed piping before being drop loaded into a tank truck through a drop chute. Since the retirement of Units 7 and 8, fly ash handling operations ceased in 2022 and no further fugitive dust control measures are required.

4.5 Maintenance Storage Area

Roll-off boxes in the Maintenance Storage Area only periodically contained bottom ash and slag, fly ash and other ash-related materials generated from routine maintenance activities. Typically, the bottom ash and slag was in a wet state when

placed into the containers but fly ash is in a dry state. When the roll-off boxes were filled, the material was promptly removed to an off-site licensed landfill. When roll-off boxes were present, the Maintenance Storage Area was assessed on a quarterly basis or more frequently during excessively dry and windy conditions. If ash material was observed 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, use of the maintenance storage area is no longer be needed.

4.6 Ash Transport Roadways

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 will be assessed on a quarterly basis and any observed accumulated ash material will be promptly cleaned up and collected for off-site removal to a licensed landfill. However, ash is not currently being transported.

4.7 Old Pond

The Old Pond has not been in use since the 1970s and is vegetated, thereby suppressing any potential fugitive dust emissions. If excavation is necessary, this material could become airborne in excessively dry and windy conditions. To minimize fugitive dust emissions from exposed dry CCR, the height of the staged material will be minimized and the material piles will be either sprayed with water or covered. Loading activities also will be limited during such occasions. Haul trucks will be covered with tarps once they have been loaded.

5.0 PLAN ASSESSMENTS/AMENDMENTS

To assure that the work practices being implemented adequately control the dust from the identified potential CCR fugitive dust emission sources at the facility, routine assessments and record keeping are performed. These procedures include the following:

5.1 Fugitive CCR Dust Assessments

Pursuant to 257.80(b)(4) and 845.500(b)(3), assessments of the potential CCR fugitive dust emission sources identified within this Plan will be conducted to assess the effectiveness of this Plan. The assessment will include observation of ash removal from ponds, temporary storage and transport activities at the facility to confirm the adequacy of the control measures. The assessments will be conducted on a quarterly basis by an individual designated by the contact identified in Section 2.2 of this Plan. Observations made during each assessment will be recorded on a form similar to the one included in Appendix B, however, the station may create their own form.

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 this Plan does not effectively minimize the CCR from becoming airborne, this Plan will be amended to include additional control measures.

5.2 Plan Amendments

This Fugitive Dust Plan will be reviewed whenever there is a change in conditions that would substantially affect the written Plan currently in place. A record of the reviews and any modifications or amendments made to the Plan currently in place will be kept on a form similar to the one included in Appendix C; however, the station may create their own form. The amended Plan will be reviewed by a Registered Professional Engineer and, if deemed acceptable, will be recertified.

5.3 Citizen Complaints

Any written or verbal complaints received from a citizen involving alleged CCR fugitive dust emission events at the facility will be recorded by an individual designated by the contact identified in Section 2.2 of this Plan. The complaints will be recorded on a form similar to the one included in Appendix D; however, the station may create their own form. Upon receipt of the complaint, an investigation of the alleged source of the fugitive dust emissions will be performed and the results of that investigation recorded on the form. If the fugitive dust emission event is confirmed, any necessary repairs or changes in operation required to mitigate the fugitive dust emissions will be implemented as soon as practicable.

6.0 FUGITIVE DUST PLAN REPORTING/RECORDKEEPING REQUIREMENTS

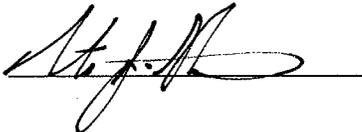
This section outlines the Plan reports that must be prepared and records that must be maintained to meet the requirements specified in the Federal and Illinois CCR Rules. These requirements include the following:

- Place the Plan in the facility's operating record and publicly accessible internet site. If the Plan is amended, replace the initial Plan with the amended Plan. Only the most recent amended Plan will be maintained in the facility's operating record and internet site.
- Prepare an annual CCR Fugitive Dust Control Report compliant with 40 CFR 257.80(c) and place it in the facility's operating record and post to the publicly accessible internet site. The annual report will include:
 - A description of the actions taken to control CCR fugitive dust,
 - A record of all citizen complaints, and
 - A summary of any corrective measures taken.
- Prepare an annual CCR Fugitive Dust Control Report compliant with 35 Ill. Code 845.500(c), place it in the facility's operating record, and submit to the IEPA as part of the annual consolidated report required by 845.550. The annual report will be posted to the publicly accessible website and will include:
 - A description of the actions taken to control CCR fugitive dust,
 - A record of all citizen complaints, and
 - A summary of any corrective measures taken.
- Provide notification to the IEPA and, if applicable, the Tribal authority when the Plan and reports are placed in the facility's operating record and publicly accessible internet site.
- Submit quarterly reports compliant with 35 Ill. Code 845.500(b)(2)(B) to IEPA within 14 days from the end of the quarter of all complaints received in that quarter. The quarterly reports will include:
 - The date of the complaint,
 - The date of the incident,
 - The name and contact information of the complainant, and
 - All actions taken to assess and resolve the complaint.

7.0 PROFESSIONAL ENGINEER CERTIFICATION

The undersigned Registered Professional Engineer is familiar with the requirements of 40 CFR 257.80 and 35 Ill. Adm. Code 845.500 and has visited and examined the facility or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this CCR Fugitive Dust Control Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and meets the requirements of 40 CFR 257.80 and 35 Ill. Adm. Code 845.500, and that this Plan is adequate for the facility. This certification was prepared as required by 40 CFR 257.80(b)(7) and 35 Ill. Adm. Code 845.500(b)(7).

Engineer: Timothy J. Stohner

Signature: 

Date: 3/2/2026

Company: KPRG and Associates, Inc.

Registration State: Illinois

Registration Number: 062.057635

License Expiration Date: November 30, 2027

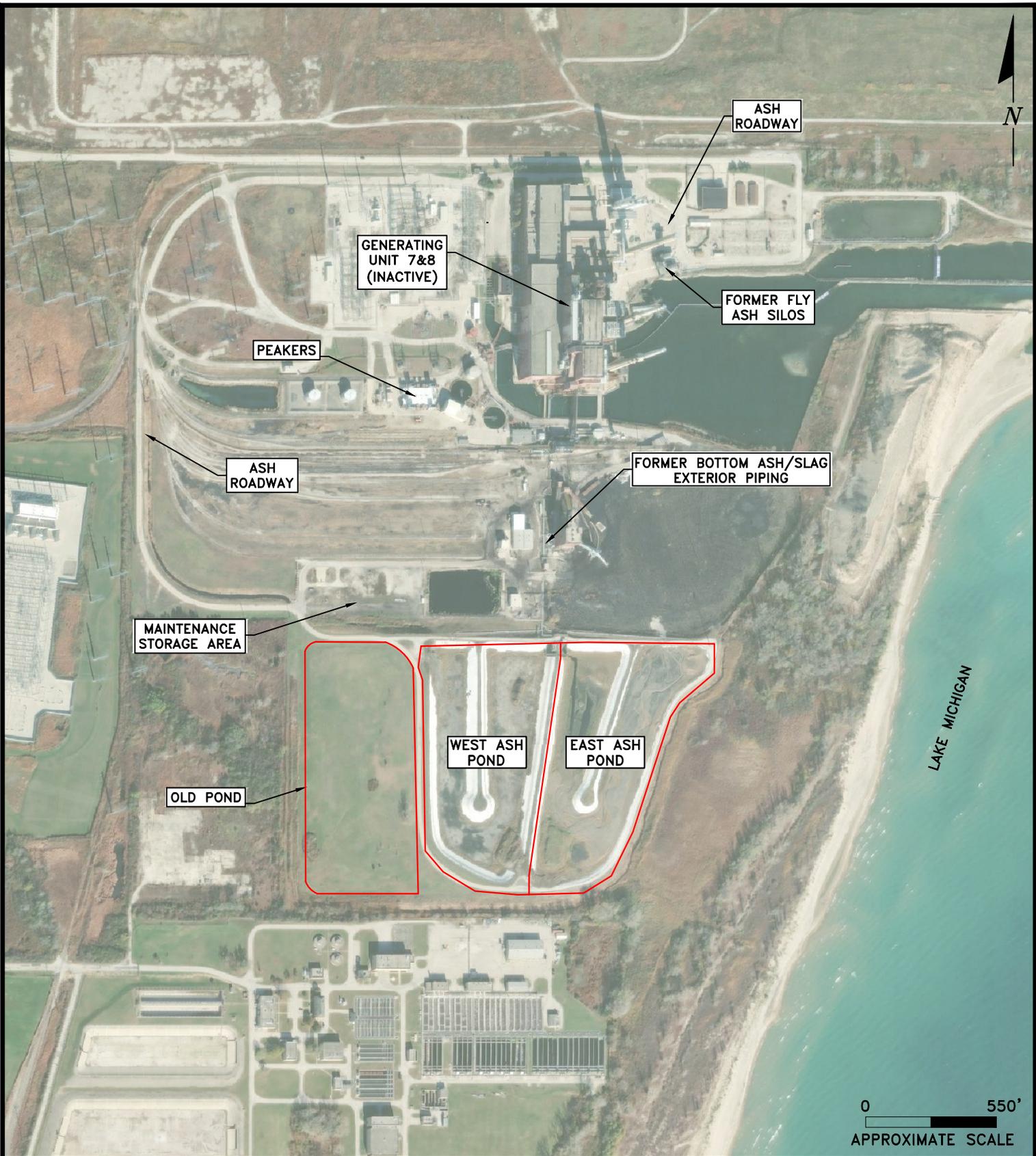
Professional Engineer Stamp:



APPENDIX A

SITE DIAGRAM

POTENTIAL FUGITIVE DUST SOURCES



ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 2B Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

SITE DIAGRAM/FUGITIVE DUST SOURCES

**WAUKEGAN STATION
WAUKEGAN, ILLINOIS**

Scale: 1" = 550'

Date: February 23, 2026

KPRG Project No. 13524

APPENDIX A

APPENDIX B

EXAMPLE ASSESSMENT RECORD

APPENDIX B

WAUKEGAN STATION

ASSESSMENT RECORD

Date	Inspector	Unit Inspected (See Key Below)	Maintenance/Cleanup Required (yes/no)	Response Action Performed (completion date)	Inspector Signature

Unit Key:

- 1 - Exterior Bottom Ash/Slag Piping
- 2 - West Ash Pond
- 3 - East Ash Pond
- 4 - Maintenance Storage Area
- 5 - Ash Roadways

APPENDIX C

EXAMPLE PLAN REVIEW AND AMENDMENT RECORD

APPENDIX D

EXAMPLE CITIZEN COMPLAINT LOG

