GRANITE SHORE POWER

# Coal Combustion Residuals
# Annual Fugitive Dust Control Report

## Merrimack Station Coal Ash Landfill
## Bow, New Hampshire

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# 1.0 Introduction

On April 17, 2015, the United States Environmental Protection Agency (US EPA) published the final rule on Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCR) from Electric Utilities under 40 Code of Federal Regulations (CFR) Parts 257 and 261. The rule regulates the disposal of CCR as a solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA). CCR includes fly ash, bottom ash, boiler slag, and flue gas desulfurization materials. The rule includes minimum criteria for existing and new CCR landfills and existing and new CCR surface impoundments and all lateral expansions consisting of location restrictions, design and operating criteria, groundwater monitoring and corrective action, closure requirements and post closure care, and recordkeeping notification, and internet posting requirements. The final rule became effective on October 19, 2015.

The final rule requires owners or operators of CCR units to record certain information in the facility's operating record. In addition, owners and operators are required to maintain a publicly accessible internet site for this information, hereinafter referred to as CCR website.

A Fugitive Dust Control Plan was prepared in October 2015 and uploaded to the Company's CCR website to satisfy the air operating criteria of 40 CFR 257.80, which requires the owner or operator of a CCR landfill to 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. A revised Fugitive Dust Control Plan was uploaded in May 2019.

As required by 40 CFR 257.80(c), this annual fugitive dust control report includes a description of the actions taken to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective actions taken.

## 1.1 General Facility Description

GSP Merrimack LLC owns and operates the Merrimack Station coal ash landfill located at 67 Ryan Road in Bow, New Hampshire as a disposal facility for ash generated at the Merrimack Station electrical generation facility. The landfill was designed for the disposal of ash residuals from the combustion of coal at Merrimack Station and meets the criteria of an existing CCR landfill under 40 CFR Part 257. The landfill is a single lined facility, approximately 5.5 acres in size with a capacity of approximately 300,000 cubic yards. The landfill is currently permitted by the New Hampshire Department of Environmental Services (NHDES) Waste Management Division, under Permit No. DPHS-SW-85-012.

# 2.0 Fugitive Dust Control

## 2.1 Dust Control Measures

The need for dust control during coal ash transport and placement activities is assessed on a continuing basis. The available methods to minimize fugitive emissions associated with coal ash landfill operations at Merrimack Station are described in detail in the Fugitive Dust Control Plan. Natural enclosures such as trees, vegetation, and topography act as a partial enclosure to protect from wind erosion. The natural enclosures represent passive dust control measures that are in place at all times throughout the year. Additionally, in 2025, the most commonly used dust control measures included: moisture conditioning, compaction, sand cover (active portion of the landfill), vehicle speed limits, truck covers, and general good housekeeping practices.

Section 2.2.9 of the Fugitive Dust Control Plan calls for a reduction or halting of landfill operations during high wind conditions. In 2025, operations ceased for at least part of the day on March 7th, March 8th and April 1st due to windy conditions.

## 2.2 Citizen Complaints

There were no citizen complaints in 2025.

## 2.3 Corrective Actions

There were no corrective actions as a result of citizen complaints in 2025.

However, GSP maintains on-going efforts to minimize dust in accordance with the Fugitive Dust Control Plan and makes continuous adjustments (such as amount of water used for conditioning) based on actual observed conditions.

## 2.4 Effectiveness of Fugitive Dust Plan

The annual review of effectiveness of the Fugitive Dust Control Plan did not result in changes to the plan for 2025.