Annual CCR Fugitive Dust Control Report - 2025

Public Power Generation Agency
City of Hastings Utilities

Gerald T. Whelan Energy Center

Hasting, Nebraska
December 17, 2025

WEC Temporary Ash Disposal Area
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1 Introduction

On April 17, 2015, the U.S. Environmental Protection Agency (EPA) published the final rule for the regulation and management of coal combustion residuals (CCR) under subtitle D of the Resource Conservation and Recovery Act (RCRA). The CCR rule defines a set of requirements for the disposal and handling of CCR in landfills and surface impoundments. One of the operating criteria for air, 40 CFR §257.80(c), specifies that an owner or operator of a CCR unit prepare an annual CCR fugitive dust control report.

The deadline for completing a subsequent report is one year after the date of completion for the previous report. The last annual CCR Fugitive Dust Control Report for the City of Hastings Utilities (City) and Public Power Generation Agency's (PPGA) Whelan Energy Center was completed December 17, 2024, and therefore this annual report is required to be completed and placed in the facility's operating record by December 17, 2025.

1.1 Purpose

The CCR rule requires CCR units to prepare an annual CCR fugitive dust control report that includes the following:

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

This report will be placed in the facility's operating record and subsequently posted to the CCR Rule Compliance Data and Information internet site (CCR website) under the City of Hastings Utilities for the Whelan Energy Center. PPGA also has a link on their website to the CCR website hosted by the City. A notification will be sent to the Director of the Nebraska Department of Water, Energy, and Environment (DWEE) of the availability of this CCR Fugitive Dust Control Report (40 CFR §257.106(g)(2) and §257.107(g)(2)).

Pursuant to the federal CCR Rule 40 CFR §257.3, "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.

1.2 Facility Background

The Gerald T. Whelan Energy Center (WEC) is located two miles east of Hastings, Nebraska and consists of two fossil fuel combustion units:

- WEC Unit No. 1 (WEC1) is owned and operated by the City,
- WEC Unit No. 2 (WEC2) is owned by PPGA of which the City is a partner and is the operating entity.

The WEC Temporary Ash Disposal Area (or CCR Unit) is located directly south of WEC1 and WEC2 in the NW quarter section of Section 14, Township 7 North, Range 9 West of Adams County, Nebraska. CCR from both units are placed in the on-site WEC Temporary Ash Disposal

Area, which was originally constructed as a surface impoundment, and currently operates as both CCR surface impoundment (west side) and CCR landfill (east side). WEC1 recently terminated sluicing of fly ash as of early November 2025. The WEC Temporary Ash Disposal Area (DWEE Permit No. NE0204129, Facility ID 58048), permitted with the State of Nebraska, is approximately 23.2 acres.

2 CCR Fugitive Dust Control Actions

The City, as operator, has taken actions to control CCR fugitive dust at the site in accordance with their amended CCR Fugitive Dust Control Plan (dated August 6, 2021). The WEC has several on-site structures and areas that are associated with CCR handling. An attached facility site map illustrates the areas of CCR handling. The following sections specifically identify the control measures that the City has utilized from December 2024 to December 2025 to control and reduce CCR fugitive dust.

2.1 Generation, Storage and Loadout of CCR

The CCR generated at the Whelan Energy Center during 2025 has been bottom ash and dry fly ash (includes economizer ash) from WEC1, and bottom ash, dry fly ash, and scrubber ash from WEC2.

2.1.1 WEC Unit 1

Prior to November 2025, fly ash from the WEC1 electric static precipitators and economizer ash conveyed within the plant building was pumped with water through a gravity pipe to the west area of the CCR Unit. WEC1 CCR is enclosed from generation and was placed in the WEC Temporary Ash Disposal Area in wet condition. As of early November 2025, WEC1 fly ash is no longer sluiced. Fly ash will be managed through a new fly ash silo located north of the plant. The WEC1 silo is equipped with a dustless unloading chute and a pneumatic unloader for loading enclosed trucks for off-site sale of material.

The bottom ash removal system collects, dewaters, and conveys bottom ash and furnace slag from the WEC1 bottom ash hopper via a drag conveyor to an open-top dump truck. Loadout occurs on north side of the plant in a 3-sided concrete bunker with 8-foot walls. A large fabric tarp is secured along the beams/columns surrounding the loadout chute to further mitigate potential fugitive dust generation by minimizing wind intrusion. Plant personnel haul the moistened bottom ash to the bottom ash bunker or the lined portion of the CCR Unit for temporary stockpiling.

Occasional emergency clean-out of the electric static precipitator may cause CCR fugitive dust. The emergency clean-out occurs within the building.

2.1.2 WEC Unit 2

The bottom ash removal system collects, dewaters, and conveys bottom ash and furnace slag from the WEC2 bottom ash hopper via submerged chain conveyor to an open-top dump truck.

Loadout occurs within the building. Plant personnel haul the moistened bottom ash to the bottom ash bunker or the lined portion of CCR Unit for temporary stockpiling.

Dry fly ash is removed from the WEC2 electric static precipitator through a vacuum system to the dry fly ash silo for temporary storage. Dry fly ash is loaded into enclosed trucks for off-site sale of material. The dry fly ash silo is equipped with a dustless unloading chute and a pneumatic unloader for loading enclosed trucks for potential off-site sale of material.

Scrubber ash is removed from the WEC2 scrubber/baghouses through a pneumatic conveyor system to the WEC2 scrubber ash silo for temporary storage. Scrubber ash is moisture conditioned with a pug mill and directly loaded into open-top dump truck for transport and temporary stockpiling in the lined portion of the CCR Unit. The silo unloading occurs within a building (overhead doors normally in the open position) and the scrubber ash silo is equipped with a dustless unloading chute for primary dust control. The scrubber ash silo is also equipped with a pneumatic unloader for loading enclosed trucks for potential off-site sale of material.

2.2 Transportation of CCR

CCR fugitive dust can occur during transfer from the generation point to the temporary storage and stockpiling of CCR in the bottom ash bunker and CCR Unit. Actions taken to control CCR fugitive dust during transportation over the past year have included:

- WEC1 fly ash had been sluiced in liquid form through a gravity pipe to the CCR Unit
- WEC1 and WEC2 bottom ash are hauled in trucks to the bottom ash bunker
- WEC2 moisture conditioning of scrubber ash for loadout and haul to the CCR Unit
- WEC2 dry fly ash, and now WEC1 dry fly ash, is hauled in enclosed trucks by the CCR contractor with the lid closed prior to the truck leaving the property
- CCR contractor and customers of pond ash, scrubber ash and bottom ash required to cover load prior to truck leaving the property
- Maintaining on-site speed limit of 15 mph
- Periodic sweeping of CCR from paved haul roads around CCR silos
- Watering haul roads, when needed
- During forecasted windy/dry conditions, further watering of haul roads and CCR Unit as described in Section 4

Water for fugitive dust control is obtained from on-site, non-potable water supply well for haul roads and non-CCR storage areas. Trucks hauling pond ash, scrubber ash, or bottom ash (i.e. CCR excavated out of the WEC Temporary Ash Disposal Area) were covered with tarps prior to going off-site for CCR fugitive dust control.

2.3 Temporary Disposal of CCR (WEC Temporary Ash Disposal Area)

CCR generated from the WEC had been sluiced in liquid form (WEC1 fly ash) or offloaded from trucks (WEC1 bottom ash, WEC2 bottom ash and scrubber ash) and placed in the CCR unit in a moisture-conditioned state which controls CCR fugitive dust during unloading. Actions taken to control CCR fugitive dust at WEC Temporary Ash Disposal Area over the past year have included:

- Receipt of sluiced fly ash from WEC1 (ended in November 2025), moisture-conditioned scrubber ash from WEC2, and de-watered bottom ash from both units (when bottom ash bunker is full)
- Spreading scrubber ash to avoid stockpile peaks to be less conducive to direct wind impact
- Watering of all areas of active equipment movement, when required
- Watering Scrubber Ash, Bottom Ash and Pond Ash stockpiles, when required
- Minimizing time between CCR excavation, stockpiling and loading into trucks for off-site haul to beneficial use
- Minimizing the drop distance between the excavator/loader buckets of CCR and trucks

Responsibility and control of watering at the dry CCR areas in the CCR Unit is given to the City or the CCR contractor as it relates to their individual operations. A fire hydrant/stationary sprayer is used to spray stormwater from the leachate retention pond onto the excavated CCR and CCR stockpiles within the permitted disposal area. A water truck is also available as needed to control CCR dust generated by winds or by mobile equipment traffic on and around the CCR Unit.

During very windy conditions, the WEC Temporary Ash Disposal Area and haul roads may be misted with water to control fugitive dust when necessary.

2.4 Temporary Storage of CCR (Bottom Ash Bunker)

Actions taken to control CCR fugitive dust at the bottom ash bunker over the past year have included:

- Receipt of de-watered bottom ash in moistened condition
- Spreading bottom ash stockpiles, when possible to avoid high peaks
- Watering the bottom ash stockpiles, when required

Responsibility and control of watering at the dry CCR areas in and around the bottom ash bunker is to the City or the CCR contractor as it relates to their individual operations.

3 Record of Citizen Complaints

The City has procedures to receive and log citizen complaints involving CCR fugitive dust events at the facility include citizen completing a standard on-line form at https://www.cityofhastings.org/departments/utilities/policies/ccr-rule-compliance.html or, contacting City of Hastings Utilities at (402) 463-1371, or filing a complaint in person at the City of Hastings Utilities administration building located at 1228 N. Denver Avenue, Hastings, NE 68901. If a citizen complaint is received it would be directed to the appropriate City personnel.

From December 2024 to December 2025, Hastings Utilities received no CCR fugitive dust complaints from citizens.

4 Summary of Corrective Measures Taken

There were no corrective measures due to citizen complaints necessary during the period covered by this report.

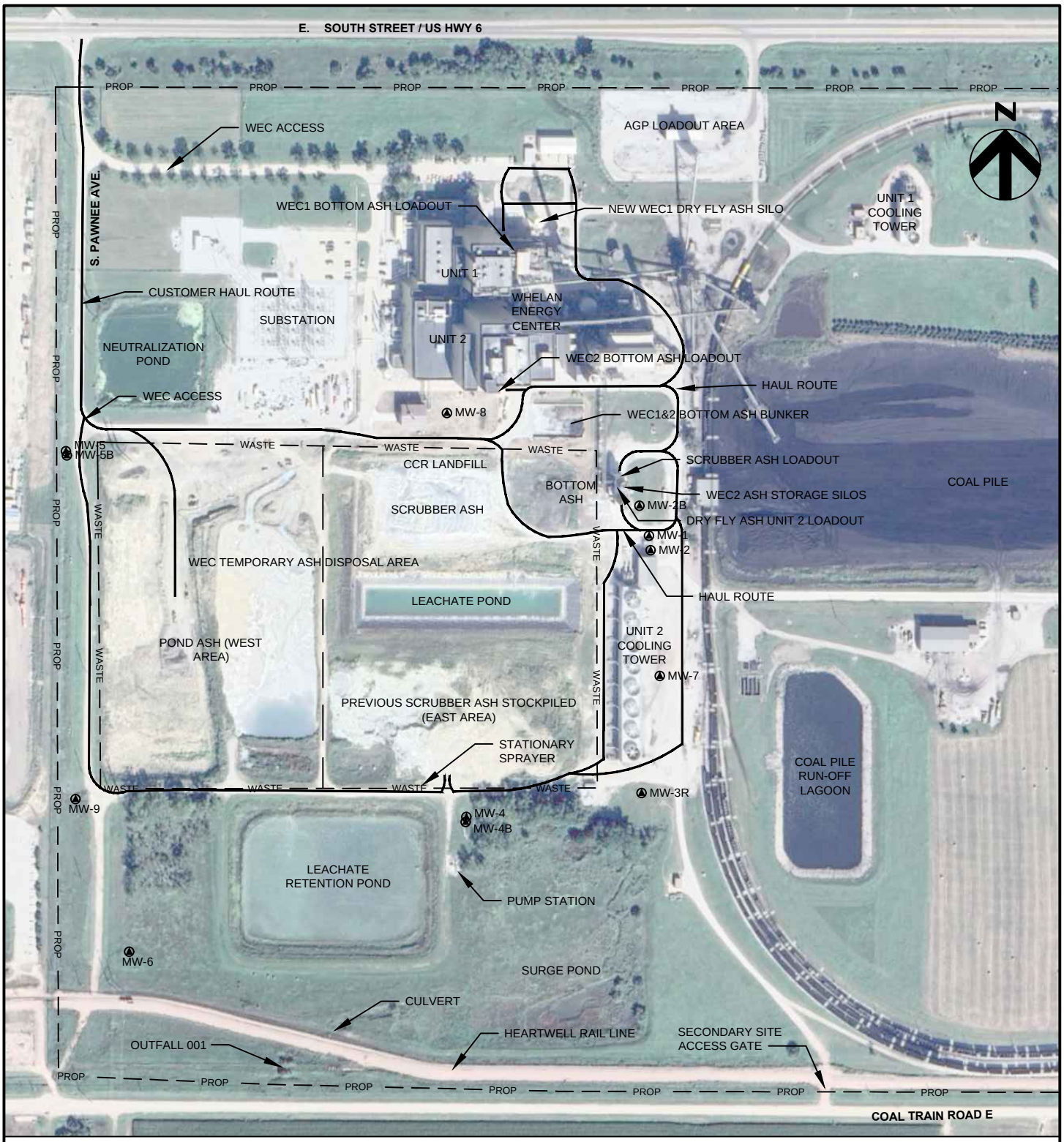
Plant personnel observe the WEC Temporary Ash Disposal Area and bottom ash bunker for visible emissions of CCR fugitive dust on a weekly basis as part of the CCR Unit weekly inspection. If there are visible emissions, the person contacts appropriate staff to apply water to specified areas of the CCR Unit, roadways, around ash silos, and bottom ash bunker, or take other appropriate corrective measures to control CCR fugitive dust at the WEC site. A summary of the corrective measures taken in response to staff observations is provided in **Table 1**.

Table 1 – WEC CCR Fugitive Dust Control, Summary of Corrective Actions

Reporting Year: (December 2024 to December 2025)

Month	CCR Fugitive Dust Control Y/N*	Number of Public Complaints	Comment/Corrective Action (Only comments and corrective action directly related to CCR Fugitive Dust Control are showing)
December 2024	**N**	**0**	N/A
January 2025	**N**	**0**	N/A
February 2025	**N**	**0**	N/A
March 2025	**N**	**0**	N/A
April 2025	**N**	**0**	N/A
May 2025	**N**	**0**	N/A
June 2025	**N**	**0**	N/A
July 2025	**N**	**0**	N/A
August 2025	**N**	**0**	N/A
September 2025	**N**	**0**	N/A
October 2025	**N**	**0**	N/A
November 2025	**N**	**0**	N/A
December 2025	**N**	**0**	N/A

* ”Y” or “N” is a compilation of the visual observation for CCR Fugitive Dust Control obtain from the weekly inspection reports.



public power generation agency

HASTINGS Nebraska

350 0 350

SCALE IN FEET

NOTES

1. AERIAL DATED 9/15/2025 FROM GOOGLE EARTH.

GERALD T. WHELAN ENERGY CENTER
PUBLIC POWER GENERATION AGENCY
HASTINGS, NEBRASKA

CCR FUGITIVE DUST CONTROL REPORT

DATE

DECEMBER 2025

FIGURE

1