Date: December 9, 2025

To: J.H. Campbell Operating Record

From: Joy R. Hwang, Environmental Quality and Sustainability Department

RE: Annual Coal Combustion Residual (CCR) Fugitive Dust Control Report
J.H. Campbell Facility

Introduction

This report serves as the Annual CCR Fugitive Dust Control Report required by the United States Environmental Protection Agency (EPA) CCR Resource Conservation and Recovery Act (RCRA) Rule. It describes the measures implemented at Consumers Energy Company's (CE) J.H. Campbell (JHC) Generating Complex for minimizing fugitive dust emissions from CCR. The JHC facility is located at 17000 Croswell St. in West Olive, Michigan, and is a coal-fired electric generating power plant with three boiler units, Units 1, 2, and 3.

This annual report has been developed and placed in the facility Operating Record in accordance with 40 CFR 257.80 and 40 CFR 257.105(g), as well as posted to the public website within 30 days in accordance with 40 CFR 257.107(d). This report is required to include a description of the actions taken by company personnel or contractors to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken.

Fugitive Dust Control Activities

The dry fly ash handling system (transfer tanks, pneumatic piping, and landfill/sale silos) and corresponding particulate matter controls are properly maintained and inspected daily. Proper moisture conditioning is maintained through the pin-paddle mixers prior to loading the ash into transport trucks for placement in the licensed landfill. Vacuum fans are operated during truck loading to assist with capture and transfer of any fugitive dust back up into the silo which is controlled by a bin vent filter. A water truck is available for further conditioning during spreading and compacting at the landfill cell as necessary. Temporary cover is placed on inactive portions of the open landfill as warranted. The surrounding roadways are well maintained and watered as needed and the 25-mph speed limit is observed. Primary roadways within the Ash Handling area are annually treated with a dust suppressant to further minimize fugitive dust.

The concrete Bottom Ash Tanks, installed in 2017, are actively accepting sluiced bottom ash. Groundwater monitoring pursuant to 40 CFR 257.102(c) continued through 2020. The Bottom Ash Tanks remain in a wet condition that minimizes fugitive dust generation. Bottom ash removed from the tanks is staged on a Bottom Ash Pad adjacent (east) of the tanks until it is qualified for beneficial reuse or is transferred to the Dry Ash Landfill. Any excavating and/or transfer activities are visually monitored for potential dusting. Activities are to be suspended in the event excessive dusting (leaving the site boundaries) is occurring.

Citizen Complaints

There were no citizen complaints of CCR fugitive dust received at the JHC facility for the time period from December 9, 2024, to December 8, 2025.

Corrective Actions

All potential CCR fugitive dust areas are monitored visually on a daily basis, and corrective as well as preventative measures are properly implemented as warranted. There have been no specific corrective actions warranted from any citizen complaint since the initial posting of the Fugitive Dust Control Plan (FDCP).

Conclusion

A site audit was conducted on October 24, 2025. Applicable aspects of the Fugitive Dust Control Plan (FDCP) were found to be correctly implemented with no findings to report; the FDCP is being amended, pursuant to 40 CFR 257.80(b)6, to reflect a change in operations for ash management consisting of initiating closure by removal of the historic placement of Coal Combustion Residuals (CCRs) in ash ponds b-k anticipated in 2026. The amended plan will be signed by a professional engineer, as required by 40 CFR 257.80(b)7, and will be posted to the Operating Record as required by 40 CFR 257.105(g).