

January 26, 2026

Mr. Keith Crane  
ENGIE North America  
1360 Post Oak Boulevard  
Suite 400  
Houston, TX 77056

**Re: 2026 Annual Fugitive Dust Control Report  
Former Mt. Tom Station Power Plant  
200 Northampton Street  
Holyoke, Massachusetts**

Dear Mr. Crane:

On behalf of Mt. Tom Generating Company LLC ("MTGC"), a wholly owned indirect subsidiary of ENGIE North America, Inc., Tighe & Bond, Inc. ("Tighe & Bond") has prepared this Annual Fugitive Dust Control Report for the former Mt. Tom Station Power Plant (the "site"). This report has been prepared in accordance with the Environmental Protection Agency ("EPA") Coal Combustion Residuals ("CCR") Legacy CCR Surface Impoundments and CCR Management Units ("CCRMU") Final Rule, published at 40 CFR § 257, Subpart D-*Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments*, in tandem with amendment 89 FR 39099, finalized May 8, 2024 ("CCR Final Rule").

The site began operation as a coal-fired generation plant in 1960. From 1960 to 1983, fly ash, bottom ash, and oil ash were disposed of on-site. In 1970, the plant was converted to operate on fuel oil and was subsequently converted back to coal in 1981; whereas, from 1960 to 1970 CCR (fly ash and bottom ash) were generated as a result of coal-fired operations, and from circa 1971 through 1981, the plant operated on fuel oils and heavy oils, resulting in the generation of oil ash. Therefore, between 1960 and 1983, excluding the timeframe between 1971 and 1981, CCR from plant operations was disposed of on-site within unlined basins and impoundment areas south of the former generation plant. Active on-site ash filling/deposition ceased in 1983, and subsequent reporting indicates that CCR waste was trucked off-site for disposal or beneficial re-use, including limited quantities of CCR that accumulated within the bottom ash basin until 2014. From 2014 through 2022, the site underwent closure through plant demolition, environmental assessment, remediation, and ecological restoration. CCR is no longer generated, nor disposed of at the site.

Access to the site interior is limited by security fencing with locked gates and the presence of the adjacent Connecticut River. Legacy CCR Surface Impoundments (the Special Basin and Bottom Ash A Basin) are individually fenced to prevent unauthorized entry of persons or livestock onto the legacy CCR surface impoundments. In addition, CCR within these basins is inherently moist and has become vegetated through natural succession since their closure in early 2020. Further, since the CCR material is located at the base of these basins, which are depressed areas compared to the typical grade around them, they are shielded to an extent from winds occurring at the typical grade elevations.

Further, the site is subject to state regulatory requirements, as outlined in the Fugitive Dust Control Plan. Areas of historic CCR disposal and deposition have been covered and are generally revegetated or are in the process of revegetation through natural succession and the recent (November 2025) hydroseed application of the basin slopes. In addition, the vegetated ash portions of the site are stable. They are substantially covered with a layer of naturally occurring organic biomass, which is supporting vegetation and is expected to further propagate, serving as a barrier and further stabilizing underlying CCR. As required by the terms and conditions

of an Activity and Use Limitation (AUL), which was detailed in the Fugitive Dust Control Plan, the vegetated ash areas (including sloped areas and the remedial caps) are periodically inspected.

The Fugitive Dust Control Plan was prepared in accordance with 40 § CFR 257.80(b), and was entered into the Facility Operating Record on December 9, 2024.

40 CFR § 257.80(c), requires the preparation of an Annual Fugitive Dust Report that outlines the following:

- A description of the actions taken by the owner or operator to control fugitive CCR;
- A record of all citizen complaints; and
- A summary of any corrective measures taken.

## Fugitive Dust Control Summary

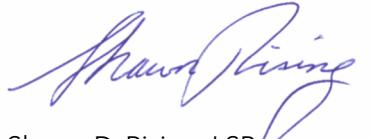
The following summarizes fugitive dust control for this reporting period (December 2024 through December 2025):

Actions Taken	<ul style="list-style-type: none"><li>• Speed limit signage is maintained at the site to minimize the generation of dust while traveling on unpaved access routes.</li><li>• Maintenance of conditions associated with the AUL Operation, Maintenance and Monitoring (OMM) Plan.</li><li>• Vegetation monitoring and maintenance to mitigate potential dust emissions and reduce erosion and runoff.</li></ul>
Citizen Complaints	<ul style="list-style-type: none"><li>• None</li></ul>
Corrective Actions	<ul style="list-style-type: none"><li>• None</li></ul>

## Conclusions

Based on the nature of the site and observed conditions, the frequency of inspections has been reduced to quarterly. The Dust Control Plan is effective as implemented. The Dust Control Plan will be amended, as needed, if site conditions change significantly. If you have any questions or require additional information, please contact the undersigned at 413-875-1615 or SRising@tighebond.com.

Very truly yours,



Shawn D. Rising, LSP  
**SENIOR PROJECT MANAGER**

Copy: Facility Operating Record

Mt. Tom Station CCR Website: <https://www.engage-na.com/project-page/?project=mt-tom-generating-llc>  
MassDEP Bureau of Waste Site Cleanup, Western Regional Office

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