Interstate Power and Light Company

Lansing Generating Station (LAN)

Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report

November 30, 2016

This report applies to the following CCR units at this facility:

CCR Surface Impoundments

LAN Upper Ash Pond

CCR Landfill

LAN Landfill

Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report

November 30, 2016

Background

This report describes the actions taken to minimize fugitive CCR dust from CCR units at this facility, provides a record of citizen complaints received since the previous report, and summarizes any corrective actions taken to minimize CCR fugitive dust. This report has been developed in accordance with 40 CFR 257.80(c).

Description of the Actions Taken to Control CCR Fugitive Dust

In accordance with the CCR Fugitive Dust Control Plan developed for this facility, the following measures were taken when needed to minimize CCR from becoming airborne:

- Establishing and enforcing a vehicle speed limit of 15 mph or less. Reduced speeds minimize fugitive dust generated from vehicle traffic.
- Storing fly ash in silos and/or buildings prior to transport. Enclosing CCR in silos and/or buildings minimizes exposure to conditions that could lead to airborne CCR.
- Wet-sluicing CCR to existing CCR surface impoundments. Moistened CCR is less likely to become airborne.
- Covering all open-bodied vehicles that are transporting CCR to minimize the generation of fugitive dust during transport of CCR.
- Minimizing fall distances when handling or transferring CCR. The use of telescoping chutes, best practices when handling CCR with end loaders, and other best management practices can be used to minimize the generation of fugitive dust.
- Promptly collecting CCR that is observed in vehicle loading/unloading areas to minimize the potential for CCR to become airborne.
- Applying water directly to CCR using a water truck or irrigation system. Moistened CCR is less likely to become airborne.
- Suspending CCR management activities, including placement of CCR, during excessively windy conditions to minimize CCR from becoming airborne.
- Placement of soil and/or vegetated cover to minimize exposure of CCR in inactive landfill areas to conditions that could lead to fugitive dust.

Record of Citizen Complaints

Citizen complaints pertaining to fugitive dust are managed in accordance with Alliant Corporate Policy ENV-107. Specifically, the complaint must be reported to Environmental Services (1) via phone call and (2) in writing by submitting a completed Environmental Incident Report to Environmental Services within 10 business days. Citizen complaints are tracked within the Alliant Environmental Management Information System ("ENVIANCE").

One CCR fugitive dust event occurred at this facility during this reporting period. On September 21, 2016, the rail silo hopper became plugged and a bypass valve was opened. The bypass valve was opened and the blockage was removed. The bypass valve then failed to close, resulting in ash to spill into the loading area and creating fugitive dust.

Summary of Corrective Measures Taken

The bypass valve was closed with temporary flanges, appropriate agency notifications were made, and the event was logged into ENVIANCE. All CCR that was spilled was immediately collected and landfilled in the onsite CCR landfill. A new bypass valve has been purchased and is scheduled for installation when the rail silo is empty. Additional preventative maintenance procedures will be implemented to address future blockages in the hopper and reduce the chance of valve failure.

Periodic Review of CCR Fugitive Dust Control Plan

The CCR Fugitive Dust Control Plan is reviewed annually, and updated as necessary, in conjunction with preparation of the Annual CCR Fugitive Dust Control Report [40 CFR 257.80(c)]. During the periodic review, staff evaluate each measure for controlling fugitive dust to ensure that it is still appropriate for minimizing CCR from becoming airborne at the facility, verify that the procedures for conditioning CCR prior to landfilling and the procedure for logging complaints are sufficient, and evaluate other operations changes at the facility to determine whether additional dust control measures should be added.

- END -