# **Interstate Power and Light Company Burlington Generating Station (BGS)**

## Coal Combustion Residuals (CCR) Fugitive Dust Control Plan

#### **November 18, 2022**

The procedures in this plan apply to the following CCR units at this facility:

## CCR Surface Impoundments

BGS Ash Seal Pond

BGS Upper Ash Pond

**BGS** Economizer Pond

**BGS** Bottom Ash Pond

# Coal Combustion Residuals (CCR) Fugitive Dust Control Plan for CCR Surface Impoundments

November 18, 2022

#### **Purpose of CCR Fugitive Dust Control Plan**

This plan describes the measures used to minimize fugitive CCR dust from facilities with CCR surface impoundments<sup>1</sup>, the procedure for logging citizen complaints involving CCR fugitive dust events, and the procedure for periodic review of this plan. This plan has been developed in accordance with 40 CFR 257.80(b).

#### **Measures for Controlling Fugitive Dust**

This facility permanently ended the combustion of coal at the end of 2021 and no longer generates CCR. The only remaining source of CCR fugitive dust on site is from closure activities that are occurring at the on-site CCR surface impoundments.

The following measures are appropriate for minimizing CCR from becoming airborne at this facility:

- Establishing and enforcing a vehicle speed limit of 15 mph or less. Reduced speeds minimize fugitive dust generated from vehicle traffic.
- Covering all open-bodied vehicles that are transporting CCR off site 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.
- Utilizing a water truck to apply water to closure areas as needed.

These measures are applicable to the CCR managed at this facility and appropriate for the conditions at this site, because they are compatible with current operations and they effectively minimize the generation of fugitive dust.

#### **Procedure for Logging Citizen Complaints**

Citizen complaints pertaining to fugitive dust will be 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 will be tracked within the Alliant Environmental Management Information System ("ENVIANCE").

11/28/2022 - Classification: Internal - ECRM12949663

<sup>&</sup>lt;sup>1</sup> "CCR" and "CCR surface impoundment" are defined at 40 CFR 257.53.

#### **Procedure for Periodic Review of CCR Fugitive Dust Control Plan**

The CCR Fugitive Dust Control Plan will be 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 will evaluate each measure for controlling fugitive dust to ensure that it is still appropriate for minimizing CCR from becoming airborne at the facility, will verify that the procedure for logging complaints is sufficient, and will evaluate other operations changes at the facility to determine whether additional dust control measures should be added.

- END -

#### P.E. Certification

I, Eric J. Nelson, hereby certify that this CCR Fugitive Dust Control Plan meets the requirements of 40 CFR 257.80(b), was prepared by me or under my direct supervision, and that I am a duly licensed Professional Engineer under the laws of the State of Iowa.

Signature		ERIC J. NELSON 23136
November 0, 2022		11/9/22
November 9, 2022 Date		7 1119122
My license renewal date is _	December 31, 2022	