Interstate Power and Light Company

Burlington Generating Station (BGS)

Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report

November 17, 2023

This report applies 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

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November 17, 2023

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).

This facility permanently ended coal combustion at the end of 2021 and now uses natural gas for fuel. The CCR Fugitive Dust Plan has been updated to reflect this change. In 2023, the facility initiated closure of all four CCR surface impoundments and has completed installation of a final cover system.

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.
- 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 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.

Some of these practices are no longer in use following the end of coal combustion at the facility.

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").

In July 2023, a resident that lives near BGS communicated a concern about dust from the CCR surface impoundment closure activities migrating on to adjacent properties.

Summary of Corrective Measures Taken

The facility immediately utilized measures described in the CCR Fugitive Dust Plan, including application of water to areas that could generate fugitive dust. No further complaints were received

during this reporting period, and construction activities to excavate and consolidate CCR have been completed.

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.

The CCR Fugitive Dust Plan was updated in 2022 to reflect the permanent end of coal combustion at this facility.

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