Wisconsin Power and Light Company

Edgewater Generating Station (EDG) I-43 Ash Disposal Facility

Coal Combustion Residuals (CCR) Fugitive Dust Control Plan

September 23, 2015

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

CCR Landfill

EDG I-43 Ash Disposal Facility (Phase 3, Modules 1-2; Phase 4, Module 1)

Coal Combustion Residuals (CCR) Fugitive Dust Control Plan for CCR Landfills

September 23, 2015

Purpose of CCR Fugitive Dust Control Plan

This plan describes the measures used to minimize fugitive CCR dust from facilities with CCR landfills[1], 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

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 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.

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 Conditioning CCR Prior to Placement

All CCR will be conditioned with water prior to placement to prevent wind dispersal. Conditioning will either occur as a result of wet-sluicing the CCR prior to dredging and landfilling, through the use of a pug mill within an enclosed building, or wetting with a water truck as material is placed in the CCR landfill. Conditioning will not result in free liquids.

[1] "CCR" and "CCR landfill" are defined at 40 CFR 257.53.

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").

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 procedures for conditioning CCR prior to landfilling and the procedure for logging complaints are 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, Mark R. Huber, 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 Wisconsin.

Mark R Huber

Signature

9.23.2015

Date

My license renewal date is 7.31.2016.