Wisconsin Power and Light Company

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

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

February 19, 2026

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

CCR Landfill

EDG I-43 Ash Disposal Facility Phase 3, Module 1

EDG I-43 Ash Disposal Facility Phase 3, Module 2

EDG I-43 Ash Disposal Facility Phase 4, Module 1

EDG I-43 Ash Disposal Facility Contact Water Swale Module

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

February 19, 2026

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) and NR 514.07(10)(a). This plan amends the original plan dated September 23, 2015 to include the new Contact Water Swale Module, in accordance with 40 CFR 257.80(b)(6)

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 facility uses best practices when handling CCR with end loaders, and other best management practices, 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.

[1] "CCR" and "CCR landfill" are defined at 40 CFR 257.53 and NR 500.03.

Procedure for Conditioning CCR Prior to Placement

CCR is routinely conditioned with water prior to placement to prevent wind dispersal. Conditioning of scrubber by-products occurs through the use of a pug mill within an enclosed building. Conditioning may also occur by wetting with a water truck as material is placed in the CCR landfill. Conditioning will not result in free liquids.

Procedure for Logging Citizen Complaints

A procedure to log citizen complaints received by the facility related to fugitive dust events has been established pursuant to 40 CFR 257.80(b)(3) and NR 514.07(10)(a)(1). 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").

Visual Inspections

The effectiveness of the CCR fugitive dust control plan will be assessed periodically in accordance with 40 CFR 257.80(b)(4) and NR 514.07(10(a)(3). In accordance with NR 514.07(10)(a)(3), the owner/operator will perform visual inspections of the landfill surface at least every 7 days. If fugitive dust concerns are observed during the inspection, action will be taken to remedy the situation. Visual fugitive dust inspections will not be performed if the CCR disposal area is covered by intermediate or final cover and there is no potential for CCR to become airborne.

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) and NR 514.07(10)(a)(5)]. The Annual CCR Fugitive Dust Control Report will be included in the annual report in accordance with NR 506.20(3)(a) and include a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken.

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.

In accordance with NR 514.07(10)(a)(4) and 40 CFR 257.80(b)(6), the CCR Fugitive Dust Control Plan will be modified in accordance with NR 514.04(6) whenever there is a change in conditions that may substantially affect the plan of operation.

- END -

P.E. Certification

I, Phillip Gearing, hereby certify that I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of ch. A−E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A−E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 500 to 538, Wis. Adm. Code.

Specifically,

- This CCR Fugitive Dust Control Plan was prepared by me or under my direct supervision and meets the requirements of 40 CFR 257.80(b) and NR 514.07 (10)(a)

Signature

February 19, 2026

Date

License number E-45115

My license renewal date is July 31, 2026.