

**Interstate Power and Light Company  
M. L. Kapp Generating Station (KAP)**

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

**March 17, 2017**

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

*CCR Surface Impoundments*

KAP Main Ash Pond

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

March 17, 2017

## **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**

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 best practices when handling CCR with end loaders and other heavy equipment can minimize the generation of fugitive dust.
- Applying water to CCR when needed. Moistened CCR is less likely to become airborne.

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”).

## **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 -**

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<sup>1</sup> “CCR” and “CCR surface impoundment” are defined at 40 CFR 257.53.

**P.E. Certification**

I, the undersigned, 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  
First and Last Name

23136  
P.E. License Number

3-17-2017  
Date

My license renewal date is 12-31-2018.