Interstate Power and Light Company

Ottumwa-Midland Landfill (OML)

Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report

November 14, 2025

This report applies to the following CCR unit at this facility:

CCR Landfill

OML Existing Landfill and OML Landfill Phase 1

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Background

This report describes the actions taken to minimize fugitive CCR dust from the CCR unit 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).

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 to minimize the generation of fugitive dust during transport of CCR.
- Minimizing fall distances when handling or transferring CCR, including the use of best practices when handling CCR with end loaders 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.

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 October 2025, a citizen complaint was submitted to the Iowa Department of Natural Resources regarding fugitive dust from OML. The fugitive dust event appears to have occurred during disposal of fly ash from the Prairie Creek Generating Station. Fly ash is typically conditioned with water to reduce the potential for fugitive dust, but in this case, there was insufficient water available on site to fully condition the material.

Summary of Corrective Measures Taken

Following the fugitive dust event, staff at OML coordinated with the Prairie Creek Generating Station and the contracted ash hauling company to redirect ash to either a municipal landfill that was equipped

to manage the fugitive dust from that product, or to the Ottumwa Generating Station storage building where the material could be conditioned prior to disposal at OML. Note that the Prairie Creek Generating Station will no longer combust coal after December 31, 2025, so this is not anticipated to be an issue in future years.

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.

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