

**Interstate Power and Light Company
Ottumwa Generating Station (OGS)**

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

OGS Ash Pond

OGS Zero Liquid Discharge 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 impoundments¹, 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.
- Storing fly ash in silos and/or buildings prior to transport. Enclosing CCR in silos and/or buildings minimizes exposure to conditions that could lead to airborne CCR.
- 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.
- Wet-sluicing CCR to existing CCR surface impoundments. 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”).

¹ “CCR” and “CCR surface impoundment” are defined at 40 CFR 257.53.

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 -

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.

EJ Nelson
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*.