




Annual Fugitive Dust Control Report

Coal Combustion Residue (CCR) Landfill

Muscatine Power and Water

December 20, 2024

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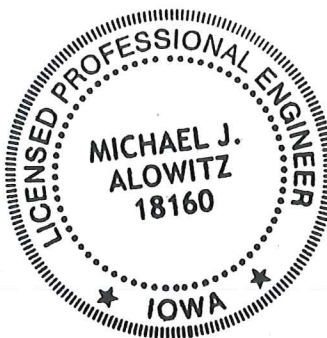
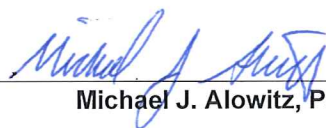
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Certification

Annual Fugitive Dust Control Report
Iowa Department of Natural Resources Permit No. 70-SDP-06-82P
CCR Landfill
Muscatine, Iowa
Muscatine Power and Water

I certify this Annual Fugitive Dust control Report meets the requirements of 40 CFR §257.80(c).

	I hereby certify that this engineering document was prepared by me or under my direct personal supervision and that I am a duly licensed Professional Engineer under the laws of the State of Iowa.	
	 Michael J. Alowitz, P.E.	<u>12/20/24</u> Date
	License Number:	<u>18160</u>
	My license renewal date is:	<u>December 31, 2026</u>
	Pages or sheets covered by this seal:	<u>Entire Document</u>

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1. Rule Requirement – Federal CCR Rule §257.80(c)

Under Federal Rule §257.80(c), Muscatine Power & Water (MPW) prepared an Annual Coal Combustion Residuals (CCR) Fugitive Dust Control Report within 14 months of placing the initial CCR Fugitive Dust Control Plan (2015) in the landfill's operating record. Subsequent annual reports are due one (1) year from the initial report date.

This Annual Fugitive Dust Control report is for 2024.

The annual fugitive dust control report includes:

1. A description of the actions taken to control CCR fugitive dust (Section 2)
2. A record of all citizen complaints (Section 3)
3. A summary of any corrective measures taken to address dust control (Section 4)

2. Description of the actions taken to control CCR fugitive dust

2.1 Haul Road

The haul road from the landfill entrance to the active fill area is surfaced with crushed gravel. To mitigate dusting, the road is watered down as needed (i.e., not every time a load of fly ash is taken to the landfill), using tanker trucks fitted with spray nozzles. The water is collected from the on-site machine shop well.

2.2 During CCR Disposal Operations

The majority of CCR disposed of at the landfill includes fly ash, flue gas desulfurization material (FGD), and boiler slag. Fly ash material is the most susceptible to dusting due to its fine particle size and dry nature.

The means for controlling fugitive dust during offloading of fly ash in the active landfill cell is a cover and wet suppression procedure. Fly ash is unloaded from a bulk tanker truck through a pipe that discharges the fly ash underneath a tarp and/or a belt trailer truck. A water truck can be used to spray down incidental fugitive dust to augment control of any dusting. An irrigation system has also been used to spray water for dust suppression during unloading procedures.

Wet dust suppression is typically not used during freezing temperatures. When temperatures are below freezing, fly ash placed at the landfill is scrutinized by MPW or contractor personnel instructed to minimize significant fugitive dust as needed. When wind speeds exceed 25 miles per hour; fly ash will not be placed at the landfill unless operating conditions provide no other viable option.

2.3 Active Area

During regular working hours, if weather conditions and areas of the active cell show potential for generating fugitive dust (loose CCR on the surface), an irrigation device (Ag- Rain Model T40A/1320) or tanker truck with sprayer is used for dust suppression. Water from the site run-off control pond is primarily used for this procedure.

3. Record of all citizen complaints

A procedure to log citizen complaints is identified in Section IV of the CCR Fugitive Dust Control Plan, updated December 5, 2018 (HR Green, 2018).

No citizen complaints were received during the 2024 reporting period.

4. Summary of corrective measures

With no fugitive dust complaints, MPW and the CCR hauling contractor will continue to limit dust when unloading in the interest of the safety of workers and citizens in the area.

A copy of this report will be placed in the operating record as required under §257.105(g)(2).

Under §257.80(d) MPW intends to comply with the recordkeeping requirements specified in §257.105(g)(2), the notification requirements specified in §257.106(g)(2), and the public internet site requirements specified in §257.107(g)(2).



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