ANNUAL FUGITIVE DUST CONTROL REPORT EXISTING COAL COMBUSTION RESIDUE (CCR) LANDFILL MUSCATINE POWER & WATER

REPORT DATE: DECEMBER 19, 2019

A. Rule Requirement - Federal CCR Rule §257.80(c)

Under Federal Rule §257.80(c), Muscatine Power & Water prepared an Annual Coal Combustion Residue (CCR) Fugitive Dust Control Report within 14 months of placing the initial CCR Fugitive Dust Control Plan (2015) in the landfill's operating record. From then on, the schedule for completing a subsequent annual report is one year after the date of completing the previous report. This document comprises Annual CCR Fugitive Dust Control Report for 2019 required under this rule.

The annual fugitive dust control report provides the following items: (1) a description of the actions taken to control CCR fugitive dust, (2) a record of all citizen complaints, and (3) a summary of any corrective measures taken to address dust control, as presented below.

1) Description of the actions taken to control CCR fugitive dust

<u>Haul Road</u>: 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.

<u>During CCR Disposal Operations</u>: The majority of the CCR disposed of at the landfill includes fly ash, flue gas desulfurization material (FGD), and boiler slag. The fly ash material is the most susceptible to dusting due to it fine particle size and dry nature. The means for controlling fugitive dust during offloading in the active landfill cell is a cover and wet suppression procedure. Fly ash is unloaded from a bulk tanker truck via pipe that discharges the fly ash underneath a tarp. A water truck is used to spray down incidental fugitive dust to augment the tarp control. Also an irrigation system has been used to spray water for dust suppression during unloading procedures. This wet suppression procedure is typically not followed during freezing temperatures. When temperatures are above freezing no fly ash is placed at the landfill when wind speeds exceed 25 MPH. When temperatures are below freezing, no fly ash is placed at the landfill when wind speeds exceed 15 MPH.

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) is used for dust suppression. Water from the run-off control pond is used for this procedure.

2) 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.

No citizen complaints were recorded during this reporting period.

3) Summary of any corrective measures

There was no visual evidence, or citizen complaints that triggered a corrective measure during this annual reporting period.

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

Under $\S257.80(d)$ Muscatine Power & Water intends to comply with the recordkeeping requirements specified in $\S257.105(g)(2)$, the notification requirements specified in $\S257.106(g)(2)$, and the public internet site requirements specified in $\S257.107(g)(2)$.

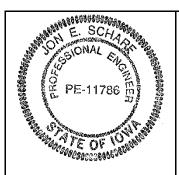
ANNUAL FUGITIVE DUST CONTROL REPORT EXISTING COAL COMBUSTION RESIDUE (CCR) LANDFILL MUSCATINE POWER & WATER

CERTIFICATION

ANNUAL FUGITIVE DUST CONTROL REPORT

CCR LANDFILL Permit No. #70-SDP-06-82P-CCR

MUSCATINE POWER & WATER MUSCATINE, IOWA



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.

Date: 12/19/19

Jon E. Scharf, P.E.

License No. 11786

My renewal date is December 31, 2021

Pages or sheets covered by this seal:

ENTIRE DOCUMENT

Prepared By:

Name: Rose Amundson, CGP

Certified Groundwater Professional

Signature: Kne /hurshow

Date: December 19, 2019

HR Green, Inc. 8710 Earhart Lane SW Cedar Rapids, IA 52404

Phone: (319) 841-4000; Fax: (319) 841-4012