



Fugitive Dust Control Plan

Inactive Coal Combustion Residuals Impoundment

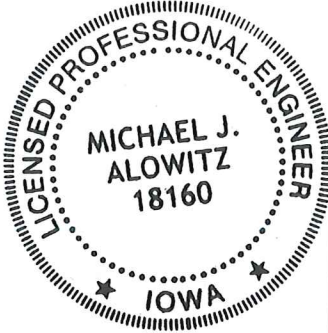
City of Ames

July 9, 2026

Certification

Fugitive Dust Control Plan
Inactive CCR Impoundment
Ames, Iowa
City of Ames

I certify this Fugitive Dust Control Plan meets the requirements of 40 CFR §257.80(b).

	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>7/9/2026</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. Introduction

The Fugitive Dust Control Plan was developed for the City of Ames, Iowa (City) inactive coal combustion residue (CCR) impoundment. A Fugitive Dust Control Plan is required under 40 Code of Federal Regulations (CFR) 257.80. This report provides the Fugitive Dust Control Plan for the inactive impoundment associated with the City's former coal-fired steam electric generation facility.

This Fugitive Dust Control Plan is in addition to, not in place of, any other applicable Site permits, environmental standards, or work safety practices.

This plan was prepared by GHD Services Inc. (GHD) for City of Ames and may only be used and relied on by City of Ames for the purpose agreed between GHD and City of Ames. GHD otherwise disclaims responsibility to any person other than City of Ames arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

2. Plan Objectives

The Fugitive Dust Control Plan identifies control measures and practices to minimize and control fugitive dust as required by 40 CFR 257.80. The plan defines the ways in which City personnel and subcontractors will mitigate CCR dust emissions associated with the inactive impoundment.

To meet these objectives, the Fugitive Dust Control Plan:

- Identifies potential CCR fugitive dust sources at the facility.
- Identifies control measures and practices to control and minimize fugitive dust.
- Identifies fugitive dust control recordkeeping requirements.
- Identifies fugitive dust control notification requirements.

3. Fugitive Dust Sources and Controls

The City of Ames no longer operates coal-fired generation units. There is no active source of CCR. All CCR associated with the inactive impoundment was consolidated under cover in 2024-2025. There are no longer sources of CCR fugitive dust.

Dust associated with the closed impoundment is limited to non-CCR dust during maintenance activities such as mowing or vehicle travel on surrounding gravel roads. CCR dust can only be generated if the cover system is removed.

4. Procedures for Logging Citizen Complaints

A specific requirement of the CCR Fugitive Dust Control Plan requires owners and operators of all CCR units to develop and implement formal procedures to log citizen complaints involving CCR fugitive dust events. If the City is contacted with a dust complaint, the call or e-mail will be routed to the Steam Electric Plant (which no longer uses coal as a fuel source), the Assistant Director Electric Services, or other responsible City staff. City staff will investigate complaints to determine and verify the nature of the complaint and the factors contributing to it, including Site operations at the time, location of complaint versus closed impoundment location, and weather conditions including wind direction. These complaints must then be included as part of the annual CCR Fugitive Dust Control Report. This report must be placed in the operating record and on publicly accessible internet Site.

5. Periodic Assessment of the Plan

The City may amend the written CCR Fugitive Dust Control Plan at any time. However, the City must amend the written plan whenever there is a change in conditions that would substantially affect the written plan such as the closure described above. The plan and any subsequent amendments must be certified by a qualified professional engineer. The City is required to prepare an annual CCR Fugitive Dust Control Report, describing additional actions taken to control CCR fugitive dust beyond what is described in the plan, a record of all citizen complaints, and a summary of any corrective measures taken.

6. Annual Report

An annual CCR fugitive dust control report will be prepared by the City in accordance with 40 CFR 257.80(c). The annual CCR Fugitive Dust Control Report will include:

- A description of the actions taken by the owner or operator to control CCR fugitive dust.
- A record of all citizen complaints.
- A summary of any corrective measures taken.

7. Record of Revisions and Updates

Table 7.1 provides a revision record for the Fugitive Dust Control Plan.

Table 7.1 *CCR Fugitive Dust Control Plan Revision History*

Revision Number	Date	Revisions Made	By Whom
A	October 2015	Initial Issue	Wenck Associates
B	April 2019	Updates to operational status	SCS Engineers
C	July 2026	Revised to reflect closed status	GHD



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