



CCR Fugitive Dust Control Plan

Humboldt Station

Corn Belt Power Cooperative

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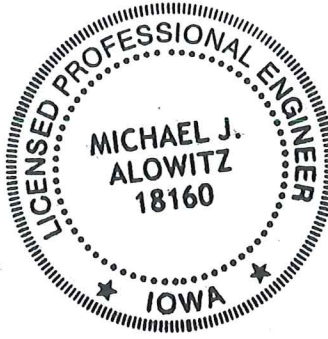
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Certification

CCR Fugitive Dust Control Plan
Humbolt Station
Corn Belt Power Cooperative

I certify this CCR Fugitive Dust Control Plan meets the requirements of 40 CFR §257.90(e).

	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.	 Date
	License Number: 18160	
	My license renewal date is: December 31, 2026	
	Pages or sheets covered by this seal: Entire Document	

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1. Introduction

The Fugitive Dust Control Plan was developed for Corn Belt Power Cooperative (Corn Belt) for the ash pond (legacy CCR surface impoundment) at the former Humboldt Station in Humboldt Iowa. The plan is in accordance with the Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (40 Code of Federal Regulations (CFR) Part 257, Subpart D, the CCR Rule). This Plan addresses actions to minimize fugitive dust generation, mitigation measures, and documentation requirements

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

2. Plan Objectives

The Fugitive Dust Control Plan identifies control measures and practices to minimize and control fugitive dust as required by the CCR Rule. The plan defines the ways in which Corn Belt personnel and subcontractors will mitigate CCR dust emissions at the facility.

To meet these objectives, the Fugitive Dust Control Plan:

- Identifies and describes the CCR fugitive dust control measure to minimize CCR from becoming airborne at the facility.
- Describes the procedures Corn Belt will follow to periodically assess the effectiveness of the plan.
- Identifies fugitive dust control recordkeeping requirements.
- Identifies fugitive dust control notification requirements.

3. Fugitive Dust Sources and Controls

Former Humboldt Station used coal for power generation until 1989. Units 1 and 2 were removed from service in 1985 and coal burning ceased in 1989. Units 3 and 4 were mothballed in January 1990. There are currently no generating units (coal or otherwise) at the former Humboldt Station. A substation is present on a portion of the former plant facility. There is no current production of CCR or disruption of existing CCR at the former Humboldt Station.

3.1 Ash Pond

The former ash pond was used as a CCR sluice pond from 1950 to 1989, when the plant was in operation. It is estimated 8,800 cubic yards of CCR remain in the former ash pond. This Dust Control Plan specifically addresses the former ash pond located at Humboldt Station.

The majority of the former Humboldt Station is fenced with a locked gate at the north end at the entrance road. The river-facing boundary of the property is not fenced. There is no ready access from the Des Moines River to the ash pond. The former ash pond is not used for any operational or recreational purpose. Trees of various diameters are growing in the former ash pond.

Although the former ash pond is not covered, it is stabilized by time, vegetation, leaf litter, and detritus. The ash pond surface is below the surrounding grade providing a wind buffer. The CCR observed at and near the surface includes slag and bottom ash. No fly ash which is subject to drying and blowing in the wind was observed. Given the nature of the ash pond surface and the limited access, dust concerns are limited.

3.2 Controls

No additional controls are anticipated to be needed due to the stability of the ash pond surface. Potential controls, if needed, could include:

- Water application to limit dust on windy days.
- Compaction of the fill to limit the surface subject to dust.
- Placement of interim cover soil, erosion control blanket, or other surface covers to limit exposure to wind.

3.3 Landfill

West of the ash pond is a closed CCR Landfill. The Landfill is not subject to this Dust Control Plan, however, due to the nature of an earthen cover, any dust from the landfill would be associated with maintenance or cover soil.

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. Corn Belt 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 the complaint, 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 the owner or operators publicly accessible internet site.

Corn Belt will log complaints as received on the log form in Appendix A. The contact information, if provided, and the nature of the complaint will be recorded. Citizens, groups, or agencies who wish to log a complaint may do so by calling 515-332-2571. Complaints can also be submitted in writing to the Corn Belter Power Cooperative administrative office at 1300 13th St N, Humboldt, IA, Attn: Humboldt CCR.

5. Periodic Assessment of the Plan

Corn Belt may amend the written CCR Fugitive Dust Control Plan at any time. However, Corn Belt must amend the written plan whenever there is a change in conditions that would substantially affect the written plan in effect. The plan and any subsequent amendments must be certified by a qualified professional engineer. Corn Belt 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.

Corn Belt commits to assessment of this plan's effectiveness in accordance with 40 CFR 257.80(b), at a minimum, on an annual basis, during preparation of the annual CCR Fugitive Dust Control Report to identify deficiencies or additional Best Management Practices. If more effective technology techniques have been identified at the time of the review and will substantially improve dust control, the plan will be amended to reflect these changes. These changes will be implemented within 6 months of the Plan's amendment. Additionally, these changes will be documented in the annual CCR Fugitive Dust Control Report in the year in which they are identified.

6. Annual Report

An annual CCR fugitive dust control report will be prepared by Corn Belt in accordance with 40 DFR 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; and
- A summary of any corrective measures taken.

7. Record of Revisions and Updates

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

Table 7.1 CCR Fugitive Dust Control Plan Revision History

Revision Label	Date	Revisions Made	By
A	11/14/2025	Initial Issue	GHD

Appendix A

Dust Complaint Log

Humboldt Station – CCR Fugitive Dust Complaint Log

Date	Complainant	Complaint Details	Actions Taken and Date(s)



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