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May 19, 2020

To: CCR Operating Record  
Re: Annual Progress Report pursuant to 40 CFR 257.103

The existing Coal Combustion Residuals (CCR) surface impoundment at the Lansing Generating Station (LAN) will close in accordance with the CCR Closure Plan to meet the requirements of 40 CFR 257.101(b)(1). There is currently an absence of available alternative disposal capacity and CCR will continue to be managed in the CCR Unit until alternative capacity is developed, as allowed under 40 CFR 101(b)(4) and 103(a).

This annual progress report describes the continued lack of alternative capacity and the progress towards the development of alternative CCR disposal capacity. This report has been developed in accordance with 40 CFR 257.103(a) and applies to the following CCR units at this facility:

CCR Surface Impoundment  
LAN Upper Ash Pond

Current Management

The LAN Upper Ash Pond is the primary receiver of sluiced bottom ash at LAN. The bottom ash is sluiced from the generating plant to the southeast corner of the LAN Upper Ash Pond where the majority of the bottom ash settles out. In addition to bottom ash, the LAN Upper Ash Pond also receives sluiced fly ash on occasion. Fly ash is occasionally sluiced to the LAN Upper Ash Pond during Unit 4 start up, Unit 4 shut down, as well as during periods where fly ash cannot be sold for beneficial reuse. Currently, approximately 90% of the fly ash produced at LAN is beneficially reused.

On-site Capacity

The LAN Upper Ash Pond is the only CCR unit located at this facility capable of receiving wet-generated CCR, and is required to close pursuant to 257.101(b)(1). There is no other on-site capacity for the management of wet-generated CCR.

Off-site Capacity

Bottom ash and economizer ash are wet-generated at LAN. It is not feasible to transport wet-generated CCR to an off-site facility. (See Federal Register at 80 FR 21423 for discussion on feasibility of transporting wet-generated CCR and applicability of alternative closure requirements.)

Progress Toward Development of Alternative Disposal Capacity

The facility has made, and continues to make, efforts to obtain additional capacity. The facility's National Pollutant Discharge Elimination System (NPDES) wastewater discharge permit requires discharges from the Upper Ash Pond to end by the end of 2021. This deadline will require changes at the facility including ending placement of wet-generated CCR in the LAN Upper Ash Pond and closure of the CCR unit in 2022.

Specific actions taken during this reporting period include:

- Procurement of Owner’s Engineer to prepare detailed pond closure designs.
- Initiated re-route of Outfall 002 to facilitate dewatering of the CCR unit.
- Initiation of a geotechnical study to evaluate volume of CCR and CCR characteristics
- Continued evaluation of bottom ash management systems to serve as alternatives to sluicing to the Upper Ash Pond.
- Continued compliance with inspection, reporting, recordkeeping, and groundwater monitoring requirements of the CCR Rule.

For more information, please contact the Alliant Energy CCR Rule Compliance Program at [CCRprogram@alliantenergy.com](mailto:CCRprogram@alliantenergy.com).

Signed,



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