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April 17, 2019

To: CCR Operating Record

Re: Notification of Intent to Comply with Alternative Closure Requirements, 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 documentation has been developed in accordance with 40 CFR 257.103(a) and applies to the following CCR unit at this facility:

CCR Surface Impoundment
LAN Upper Ash Pond

The following conditions have been met:

- (i) No alternative disposal capacity is available on-site or off-site.

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.)

- (ii) The owner or operator has made, and continues to make, efforts to obtain additional capacity.

The facility is currently planning changes to CCR management that will end placement of CCR in the affected unit. Specifically, the facility's National Pollutant Discharge Elimination System

(NPDES) wastewater discharge permit requires the installation of dry ash handling systems by the end of 2021. The installation of these systems will end the placement of wet-generated CCR in the LAN Upper Ash Pond and enable closure of the CCR unit in 2022.

- (iii) The owner or operator must remain in compliance with all other requirements of this subpart, including the requirement to conduct any necessary corrective action.

The facility remains in compliance with all other requirements of 40 CFR 257 Subpart D. The additional requirements in this subpart include:

- Design Criteria [40 CFR 257.70-74]
- Operating Criteria [40 CFR 257.80-84]
- Groundwater Monitoring and Corrective Action Requirements [40 CFR 257.90-98]
- Closure and Post-Closure Care Requirements [40 CFR 257.100-104]
- Recordkeeping, Notification, and Posting of Information to the Internet [40 CFR 257.105-107]

Documents demonstrating compliance with the requirements of 40 CFR 257 Subpart D are kept in the facility Operating Record and are posted on the Alliant Energy CCR Rule Compliance Data and Information web site: <https://ccr.alliantenergy.com/>

- (iv) The owner or operator must prepare an annual progress report documenting the continued lack of alternative capacity and the progress towards the development of alternative CCR disposal capacity.

No annual progress reports are currently required. IPL will prepare annual progress reports as required by 40 CFR 257.103(c)(2). The first annual progress report will be prepared no later than 13 months after placing this notification in the facility operating record, in accordance with 40 CFR 257.103(c)(2)(i), and subsequent progress reports will be prepared within 12 months of the completing the previous report.

The Notice of Intent to Close has been placed into the facility Operating Record, as required by 40 CFR 257.102(g).

For more information, please contact the Alliant Energy CCR Rule Compliance Program at CCRprogram@alliantenergy.com.

Signed



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