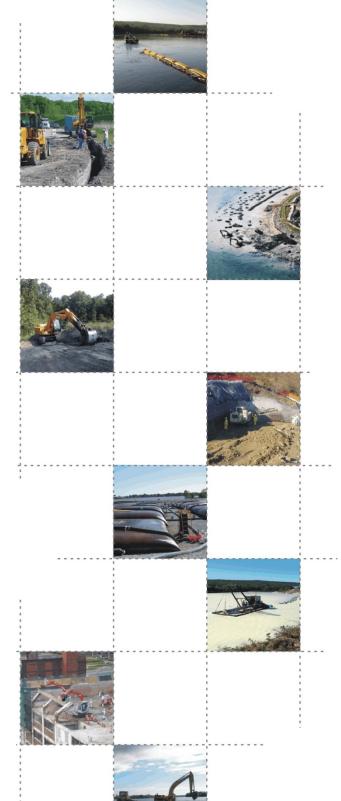
ALLIANT ENERGY Wisconsin Power and Light Company Nelson Dewey Generating Station

CCR SURFACE IMPOUNDMENT

STRUCTURAL STABILITY ASSESSMENT

Report Issued: September 20, 2016 Revision 0





EXECUTIVE SUMMARY

This Structural Stability Assessment (Report) is prepared in accordance with the requirements of the United States Environmental Protection Agency (USEPA) published Final Rule for Hazardous and Solid Waste Management System – Disposal of Coal Combustion Residual from Electric Utilities (40 CFR Parts 257 and 261, also known as the CCR Rule) published on April 17, 2015 and effective October 19, 2015.

This Report assesses the structural stability of each CCR unit at Nelson Dewey Generating Station in Cassville, Wisconsin in accordance with §257.73(b) and §257.73(d) of the CCR Rule. For purposes of this Report, "CCR unit" refers to an existing CCR surface impoundment.

Primarily, this Report is focused on documenting whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded within each CCR unit.



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1 Introduction

The owner or operator of the Coal Combustion Residual (CCR) unit must conduct an initial and periodic structural stability assessments and document whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein. This Report is prepared in accordance with the requirements of §257.73(b) and §257.73(d) of the CCR Rule.

1.1 CCR Rule Applicability

The CCR Rule requires a periodic structural stability assessment by a qualified professional engineer (PE) for existing CCR surface impoundments with a height of 5 feet or more and a storage volume of 20 acre-feet or more; or the existing CCR surface impoundment has a height of 20 feet or more.

1.2 Structural Stability Assessment Applicability

The Nelson Dewey Generating Station (NED) in Cassville, Wisconsin (Figure 1) has one existing CCR surface impoundment that meet the requirements of §257.73(b)(1) and/or §257.73(b)(2) of the CCR Rule, which are identified as follows:

• NED Slag Pond

Wisconsin Power and Light Company also has one inactive CCR surface impoundment, the NED WPDES Pond. The NED WPDES Pond will be handled under a separate transmittal in accordance with the CCR Rule, if needed, and is not discussed further herein.



2 FACILITY DESCRIPTION

NED is located north of the Village of Cassville, Wisconsin on the eastern shore of the

Mississippi River in Grant County, at 11999 County Highway VV, Cassville, Wisconsin

(Figure 1). Located north of the generating plant is Stonefield Village (a state historical

landmark) and Nelson Dewey State Park.

NED was a fossil-fueled electric generating station consisting of two steam electric

generating units that were retired in December 2015. Sub-bituminous coal was the

primary fuel for producing steam. The burning of coal produces a by-product of CCR.

The CCR at NED was categorized into two types, slag and fly ash. The fly ash was

collected by the electrostatic precipitators and pneumatically conveyed to the on-site fly

ash storage silo that is equipped with a baghouse for dust control. The fly ash was then

transported off-site for beneficial reuse. The slag was sluiced to a surface impoundment

identified as the NED Slag Pond (Figure 2). The NED Slag Pond is located northwest of

the generating plant and is presently the only existing CCR surface impoundment at

NED.

General Facility Information:

Date of Initial Facility Operations:

WPDES Permit Number: WI-0002381-07-0

Latitude / Longitude: 42° 43′ 30.792″ N -91° 0′ 40.032″ W

1959

Unit Nameplate Ratings: Unit 1 (1959): 100 MW

Unit 2 (1961): 100MW



2.1 NED Slag Pond

The NED Slag Pond is located northwest of the generating plant and south of the on-site closed ash landfill, Figure 2. The NED Slag Pond receives storm water runoff from part of the on-site closed ash landfill, and the slag handling area. The NED Slag Pond was the primary receiver of process flows from the generating plant prior to December 31, 2015 when the facility's generating units retired. Wastewater was also periodically pumped from the NED WPDES Pond to the NED Slag Pond. Process flows, prior to the facility ceasing operations, included sluiced CCR (slag) from the slag tanks located inside the generating plant, and flows associated with the seal well sump pumps. Flows from the seal well sump pumps included soot blowers, air compressors, boiler blowdown, Unit 1 and Unit 2 floor sumps, oil and hydrogen coolers and demineralization/reverse osmosis multi-media units.

Prior to the facility ceasing operations, the sluiced slag was discharged into the east end of the NED Slag Pond where the majority of CCR was recovered. A dozer was used to push the CCR towards an excavator for dredging. Prior to October 19, 2015, the dredged CCR was stockpiled adjacent to the NED Slag Pond for dewatering. Once dewatered, the CCR was transported off-site for beneficial use. CCR has not been added to any stockpiles outside of the NED Slag Pond on or after October 19, 2015, the effective date of the CCR Rule.

The water used to sluice the CCR from the generating plant to the NED Slag Pond flowed from the east end to the west end of the NED Slag Pond. The southwest corner of the NED Slag Pond consists of the facility's Wisconsin Pollution Discharge Elimination System (WPDES) Outfall 002. The concrete outfall structure includes a rectangular weir restriction that discharges into a 30-inch diameter reinforced concrete pipe (RCP). The water flows through the WPDES Outfall 002, under the embankment on the west side of the NED Slag Pond, and discharges into a riprap lined swale that flows to the southwest into the Mississippi River.



The surface area of the NED Slag Pond is approximately 4.8 acres and has an embankment height of approximately 15 feet from the crest to the toe of the downstream slope. The interior storage depth of the NED Slag Pond is approximately 10 feet. The total volume of impounded CCR and water within the NED Slag Pond is approximately 75,000 cubic yards.



3 STRUCTURAL STABILITY ASSESSMENT- §257.73(d)

This Report documents whether the design, construction, operation, and maintenance of

each CCR unit is consistent with recognized and generally accepted good engineering

practices for maximum volume of CCR and CCR wastewater which can be impounded.

3.1 NED Slag Pond

The NED Slag Pond is located in an area northwest of the area that was filled during

construction of NED in the late 1950's. The original ground surface was at elevation 610

feet above mean sea level as indicated by boring logs taken in the area during planning

for plant construction in 1955, Appendix A. The soil present to elevation 500 feet is loose

to medium dense fine to medium sand trending to dense sand with depth. In 2007

additional borings were installed near the NED Slag Pond and indicated the presence of

sand fill bringing the site grade to 620 feet.

In 2011, geoprobe borings were installed at four locations on the embankments of the

NED Slag Pond to determine the materials used to construct the embankments over

original grade at approximate elevation 608 to 610 feet. The embankment borings show

that slag fill was used to construct the embankments and are underlain by sand,

Appendix B.

The locations of the borings in Appendix A and B are shown on Figure 3.

The NED Slag Pond was constructed in 1978 as indicated on the drawings of the outlet

structure, Appendix C. The outlet consists of a 30 inch diameter RCP pipe set at invert

elevation 615 feet. At some time after the installation of the impoundment, an overflow

weir structure was added to allow for measurement of normal outlet flows by adding the

steel plate weir shown in Appendix C.

The NED Slag Pond accepts storm water runoff from a part of the closed landfill adjacent

to the impoundment and from the former slag handling area located between the NED

Slag Pond and the sheet pile bulkhead wall at the Mississippi River.

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3.1.1 CCR Unit Foundation and Abutments - §257.73(d)(1)(i)

The foundation of the NED Slag Pond embankment is founded on loose to medium dense sand deposited by the Mississippi River. The sand has adequate strength to support the loads from the 15 foot high embankments. The sand will have minimum internal friction angle of 30°, which is adequate for structural stability of the impoundment under maximum water elevation.

3.1.2 Slope Protection - §257.73(d)(1)(ii)

The impoundment is incised on the north and east sides. The west embankment crest is about 50 feet wide and contains an access road. The west slope is 2:1 at its steepest point, although most of the surrounding slope on the upstream and downstream side is 3:1. The slope vegetation is managed and is comprised of shallow rooting vegetation, which is adequate to protect against surface erosion. The south embankment is also 3:1 and is vegetated with shallow rooting grasses, which is adequate to protect against surface erosion.

Sudden drawdown is addressed in Section 3.1.7.

3.1.3 CCR Embankment Density- §257.73(d)(1)(iii)

The embankment is constructed of boiler slag which is known to be similar to an angular well graded sand in gradation. The internal friction angle if compacted is expected to be 34° and even if uncompacted will not have a friction angle lower than 30°. The embankment material and installation is adequate for the structural stability of the impoundment under maximum water elevation.

3.1.4 Vegetation Management - $\S257.73(d)(1)(iv)$

Historically vegetation management has been conducted on a periodic basis. At the time of the initial Annual Inspection in October 2015, small areas of downstream slope of the west embankment could not be properly inspected due to the presence of dense/tall brush and woody vegetation along a portion of slope. Since the Annual Inspection, the



facility has removed woody deep rooting vegetation from the embankment and has managed the remaining grassy vegetation to facilitate effective inspections. The facility plans to continue managing the vegetation on the embankments at a height that facilitates effective inspections.

3.1.5 Spillway Management - §257.73(d)(1)(v)

The NED Slag Pond discharges through a 2 foot wide overflow weir set at elevation 615.3 feet in a concrete wet well in the west corner of the impoundment. The overflowing water discharges through a flush face 30-inch diameter RCP pipe at invert elevation 615.0 feet, Figure 2. The culvert is constructed of non-erodible material and designed to carry sustained flows.

The culvert are checked for malfunction (e.g., blockages, deformations) during the weekly inspections by the facility personnel.

This impoundment currently has a hazard potential classification of "Low," which in turn requires an evaluation of the impacts of a 100 year, 24-hour rainfall event. The Inflow Flood Control Plan, which is a separate document developed to comply with §257.82, shows that the precipitation from this event will drain through the culverts without overtopping the embankments of the impoundment. The freeboard at peak flow will be approximately three feet.

3.1.6 Hydraulic Structures - §257.73(d)(1)(vi)

The discharge structures from the NED Slag Pond are comprised of one 30-inch diameter RCP. On June 22, 2016 the pipes were inspected using remote camera video inspection. The inspection showed that there was minimal deterioration, deformation, distortion, sedimentation, debris, and no bedding deficiencies were observed.

3.1.7 Sudden Drawdown - §257.73(d)(1)(vii)

The outer slope of the NED Slag Pond may be inundated when the Mississippi River exceeds flood stage (614.5 feet) at Cassville, Wisconsin. The maximum flood of record at



Cassville is 620.6 feet, United States Army Corps of Engineers records. The outer banks could be subjected to rapid drawdown after the storm.

The embankment and foundation material at the NED Slag Pond has a permeability greater than 10^{-4} cm/ $_{\rm sec}^{1}$ and would drain quickly on rapid drawdown. There is no structural stability risk from rapid drawdown.

USACE, Slope Stability, EM 1110-2-1902, October 2003
 Wisconsin Power and Light Company – Nelson Dewey Generating Station

Structural Stability Assessment September 20, 2016



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4 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

To meet the requirements of 40 CFR 257.73(d)(3), I Mark W. Loerop hereby certify that I am a licensed professional engineer in the State of Wisconsin; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in 40 CFR 257.73(b) and 40 CFR 257.73(d).



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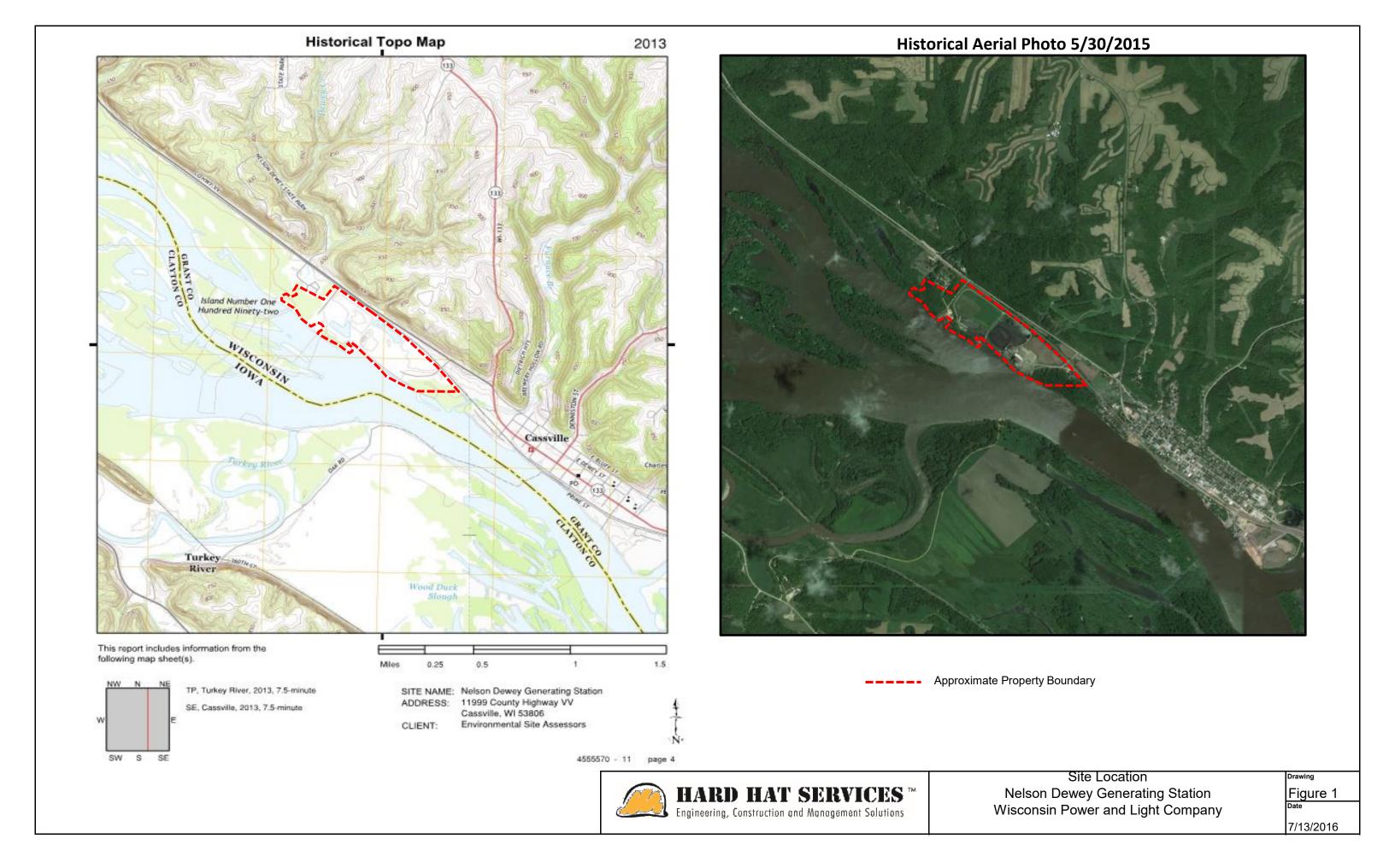
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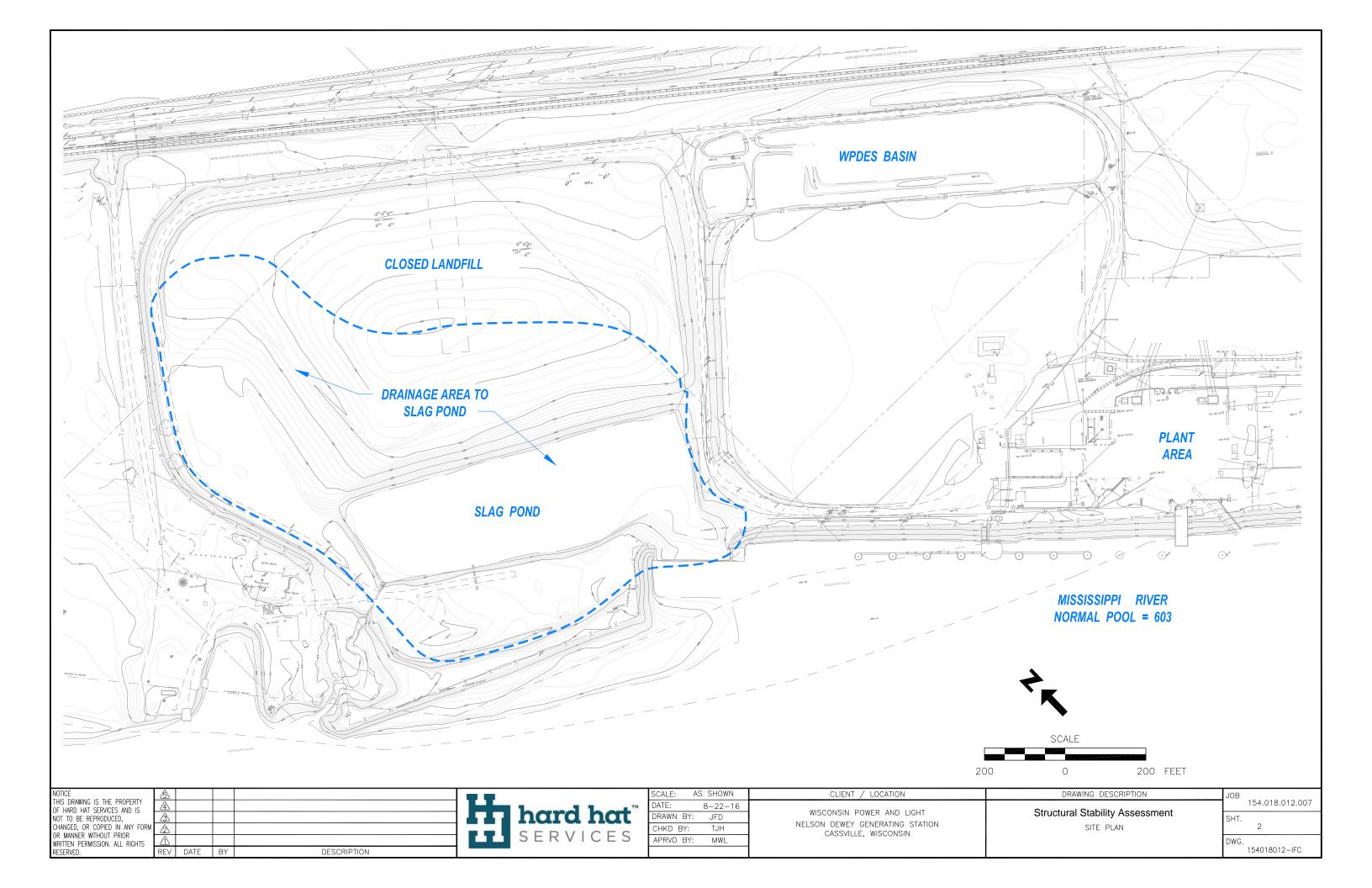
FIGURES

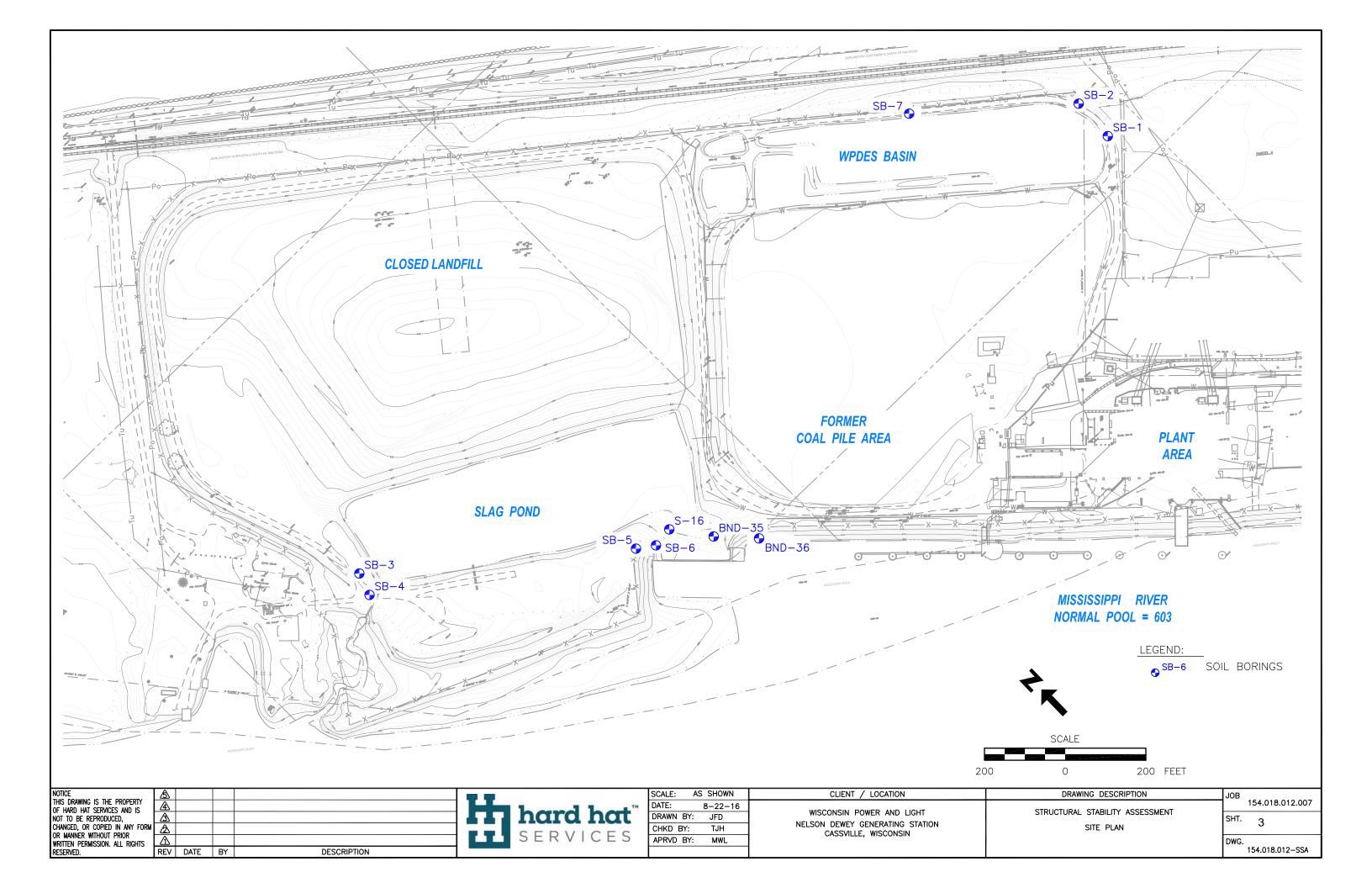
Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

Structural Stability Assessment







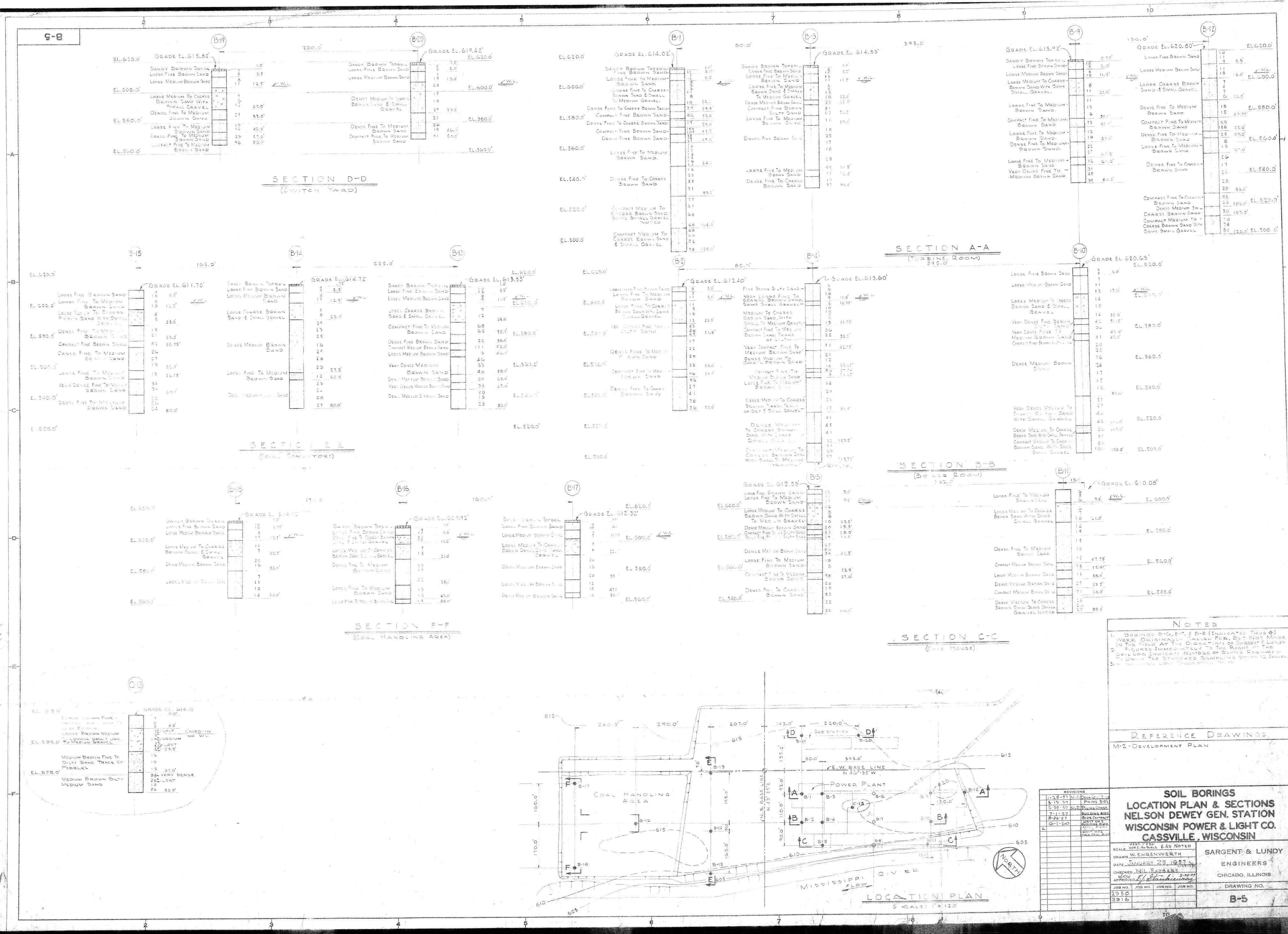


APPENDIX A – Deep Foundation Soil Borings

Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

Structural Stability Assessment





TTL Associates, Inc. 1915 N 12th Street Toledo, Ohio 43624 Telephone: 419-324-2222

BORING NUMBER BND-35 PAGE 1 OF 3

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	620			CRUSHED STONE - 18 Inches FILL - Moist Medium Dense Brown POORLY GRAD	1.5' ED	M	SS 1	100	10-10-10- 10 (20)	NP		A	
-		 		SAND w/Trace Gravel		M	SS 2	100	10-10-14- 14 (24)	NP		A	
-	615	5 -			6.0'	M	SS 3	100	4-6-5-4 (11)	NP		A	
_				FILL - Moist Loose Brown POORLY GRADED SAN	ט	M	SS 4	100	4-4-3-2 (7)	NP		A	
ŀ) -	10		-Very Loose Dark Brown	38	M	SS 5	100	1-1-1-1 (2)	NP	6	A	
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	605	15				M	SS 6	100	2-2-3 (5)	NP		A	
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TTL Associates, Inc. 1915 N 12th Street Toledo, Ohio 43624 Telephone: 419-324-2222

BORING NUMBER BND-35

PAGE 2 OF 3

Telephone: 419-324-2222 Fax: 419-241-1808 PROJECT NAME Nelson Dewey Units 1 and 2 LIENT Washington Group PROJECT NUMBER 3128.01 PROJECT LOCATION Cassville, WI SAMPLE TYPE NUMBER UNCONF. COMP. STR. (tsf) DRY UNIT WT. (pcf) ELEVATION (ft) MC RECOVERY (RQD) BLOW COUNTS (N VALUE) GRAPHIC LOG DEPTH (ft) 60 MATERIAL DESCRIPTION ▲ SPT N VALUE ▲ 40 60 80 33.5 Moist Medium Dense Brown POORLY GRADED SAND SS 4-7-9 89 NP w/Trace Gravel, Clay, and Silt (SP) 10 (16)35 585 SS 4-7-11 78 NP (18)40 580 SS 11-15-12 NP 12 (27)45 575 SS 10-17-12 78 NP 13 (29)50 570 -Wet (Free Water in Jar Noted) 20 SS 10-11-7 100 NP 14 (18)RD 3128.01.GPJ GINT US LAB.GDT 12/4/07 Wet Very Dense Brown POORLY GRADED SAND (SP) 17-29-36 SS NP 100 (Free Water in Jar Noted) 15 (65)60 Moist Medium Dense Brown POORLY GRADED SAND GEOTECH SS 5-5-7 67 NP (SP) 16 (12)



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BORING NUMBER BND-35

PAGE 3 OF 3

Fax: 419-241-1808 LIENT Washington Group PROJECT NAME Nelson Dewey Units 1 and 2 PROJECT NUMBER 3128.01 PROJECT LOCATION Cassville, WI UNCONF. COMP. STR. (tsf) SAMPLE TYPE NUMBER DRY UNIT WT. (pcf) ELEVATION (ft) GRAPHIC LOG RECOVERY (RQD) BLOW COUNTS (N VALUE) DEPTH (ft) 40 60 MATERIAL DESCRIPTION ▲ SPT N VALUE ▲ 40 60 SS 17 4-6-9 56 NP (15)70 550 SS 18 9-9-14 67 NP (23)545 SS 19 7-8-12 NP 67 (20) 80.0 80 Bottom of hole at 80.0 feet. RD 3128.01.GPJ GINT US LAB.GDT 12/4/07

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BORING NUMBER BND-36 PAGE 1 OF 3

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	· -				8.0'	SS 4	100	7-10-12-16 (22)	NP		A		
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BORING NUMBER BND-36

PAGE 2 OF 3

CLIENT Washington Group PROJECT NAME Nelson Dewey Units 1 and 2 PROJECT NUMBER 3128.01 PROJECT LOCATION Cassville, WI SAMPLE TYPE NUMBER UNCONF. COMP. STR. (tsf) DRY UNIT WT. (pcf) ELEVATION (ft) GRAPHIC LOG RECOVERY (RQD) DEPTH (ft) MATERIAL DESCRIPTION ▲ SPT N VALUE ▲ 40 60 80 -Wet Loose (Free Water in Jar Noted) SS 4-4-4 NP 10 (8) 35 585 38.5 Moist Medium Dense Brown POORLY GRADED SAND SS 11 8-12-18 NP 89 (30)40 580 SS 12 8-8-8 89 NP (16)45 575 SS 7-8-10 89 NP 13 (18) 50 570 53.5 Moist Dense Brown POORLY GRADED SAND (SP) 8-10-24 NP 100 (34)1D 3128.01.GPJ GINT US LAB.GDT 12/4/07 <u>55</u> 565 58.5 Moist Medium Dense Brown POORLY GRADED SAND 8-10-12 0 NR w/Silt (SP/SM) (22)15 60 -Wet (Free Water in Jar Noted) SS 8-8-8 NP 56 16 (16)



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BORING NUMBER BND-36 PAGE 3 OF 3

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APPENDIX B – Embankment Soil Borings

Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

Structural Stability Assessment



BORING LOG

CLIENT: Aether dbs

COORDINATES: E NOT SURVEYED

N NOT SURVEYED

PROJECT: Cassville, WI

BORING NO.: SB3

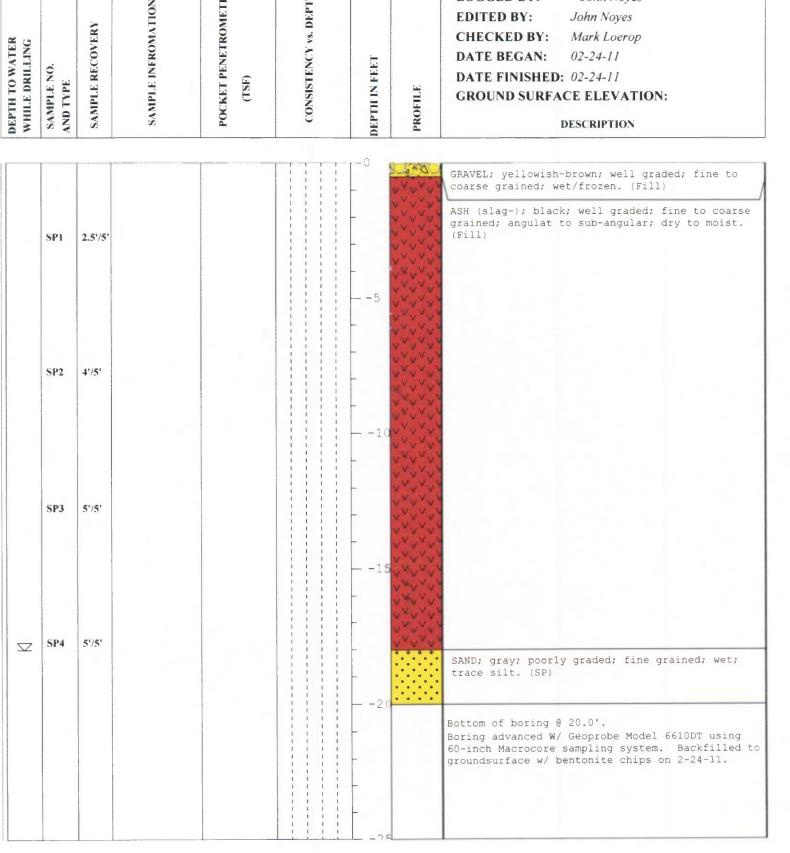
page 1 of 1

Environmental Field Services, LLC

POCKET PENETROMETER LOGGED BY: CONSISTENCY vs. DEPTH

John Noves **EDITED BY:** John Noves **CHECKED BY:** Mark Loerop 02-24-11 DATE BEGAN: DATE FINISHED: 02-24-11

GROUND SURFACE ELEVATION:



BORING LOG

N NOT SURVEYED

COORDINATES: E NOT SURVEYED

Environmental Field Services, LLC

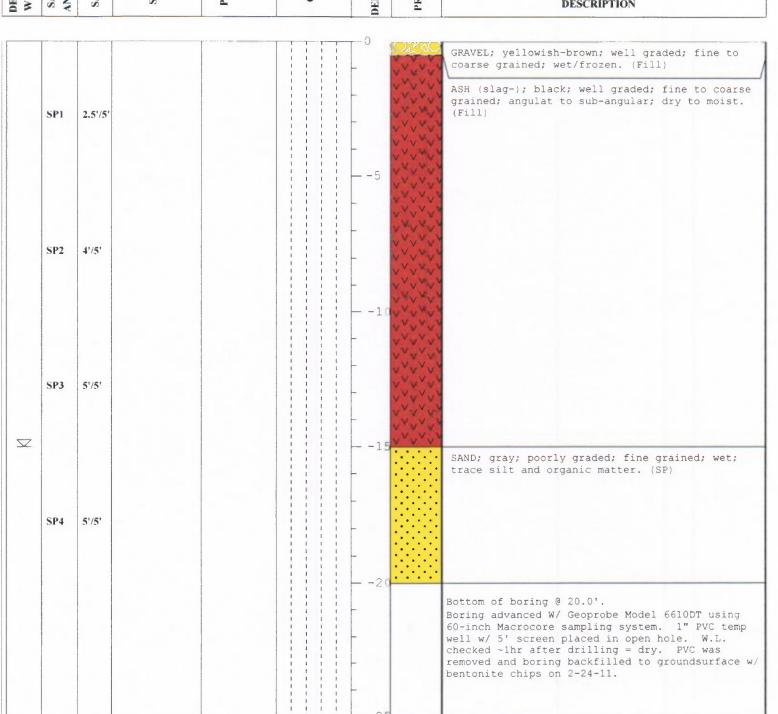
PROJECT: Cassville, WI

CLIENT: Aether dbs

BORING NO.: SB4

page 1 of 1

WHILE DRILLING SAMPLE NO. SAMPLE RECOVERY SAMPLE INFROMATION	POCKET PENETROMETER (TSF) CONSISTENCY vs. DEPTH	DEPTH IN FEET PROFILE	LOGGED BY: John Noyes EDITED BY: John Noyes CHECKED BY: Mark Loerop DATE BEGAN: 02-24-11 DATE FINISHED: 02-24-11 GROUND SURFACE ELEVATION: DESCRIPTION
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BORING LOG

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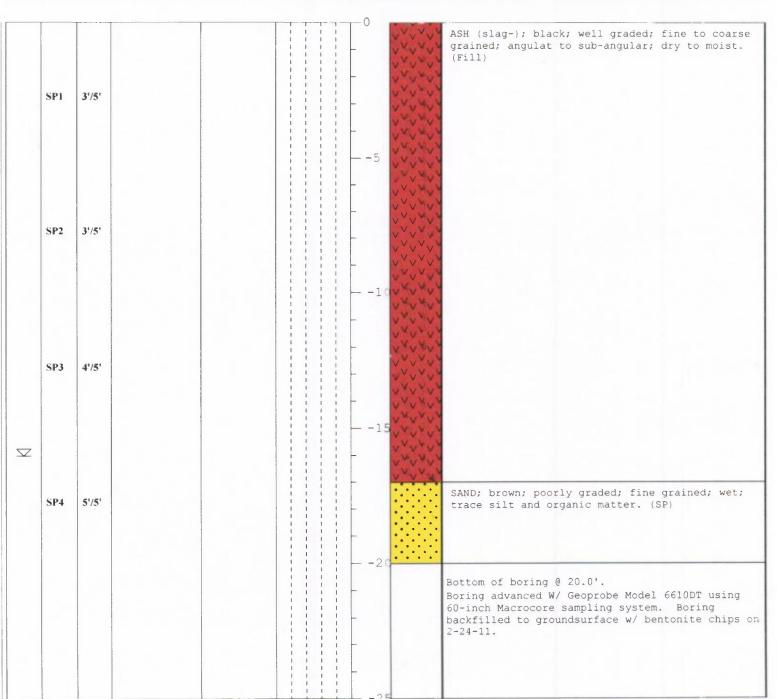
BORING NO.: SB5

Environmental Field Services, LLC

PROJECT: Cassville, WI

page 1 of 1

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BORING LOG

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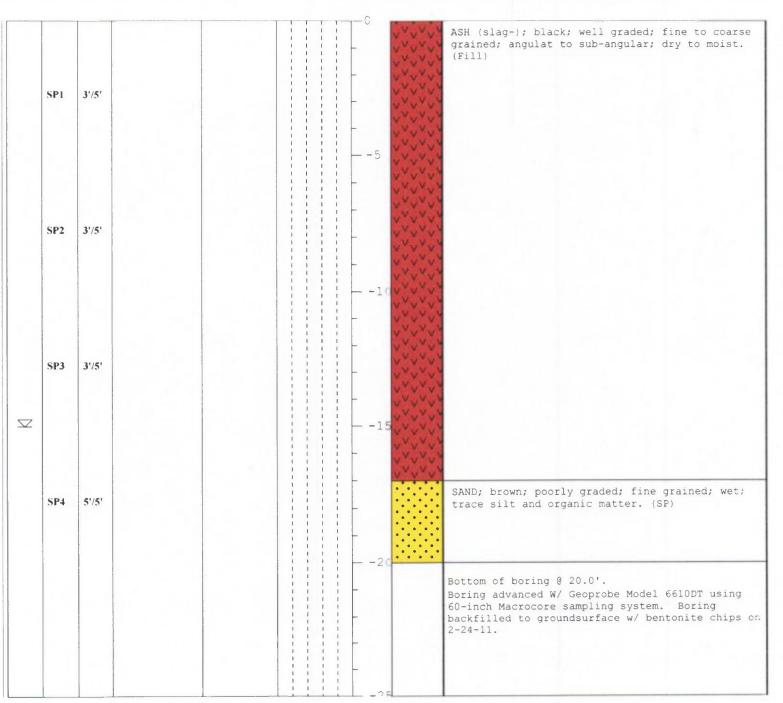
CLIENT: Aether dbs Environmental Field Services, LLC

PROJECT: Cassville, WI

BORING NO.: SB6

page 1 of 1

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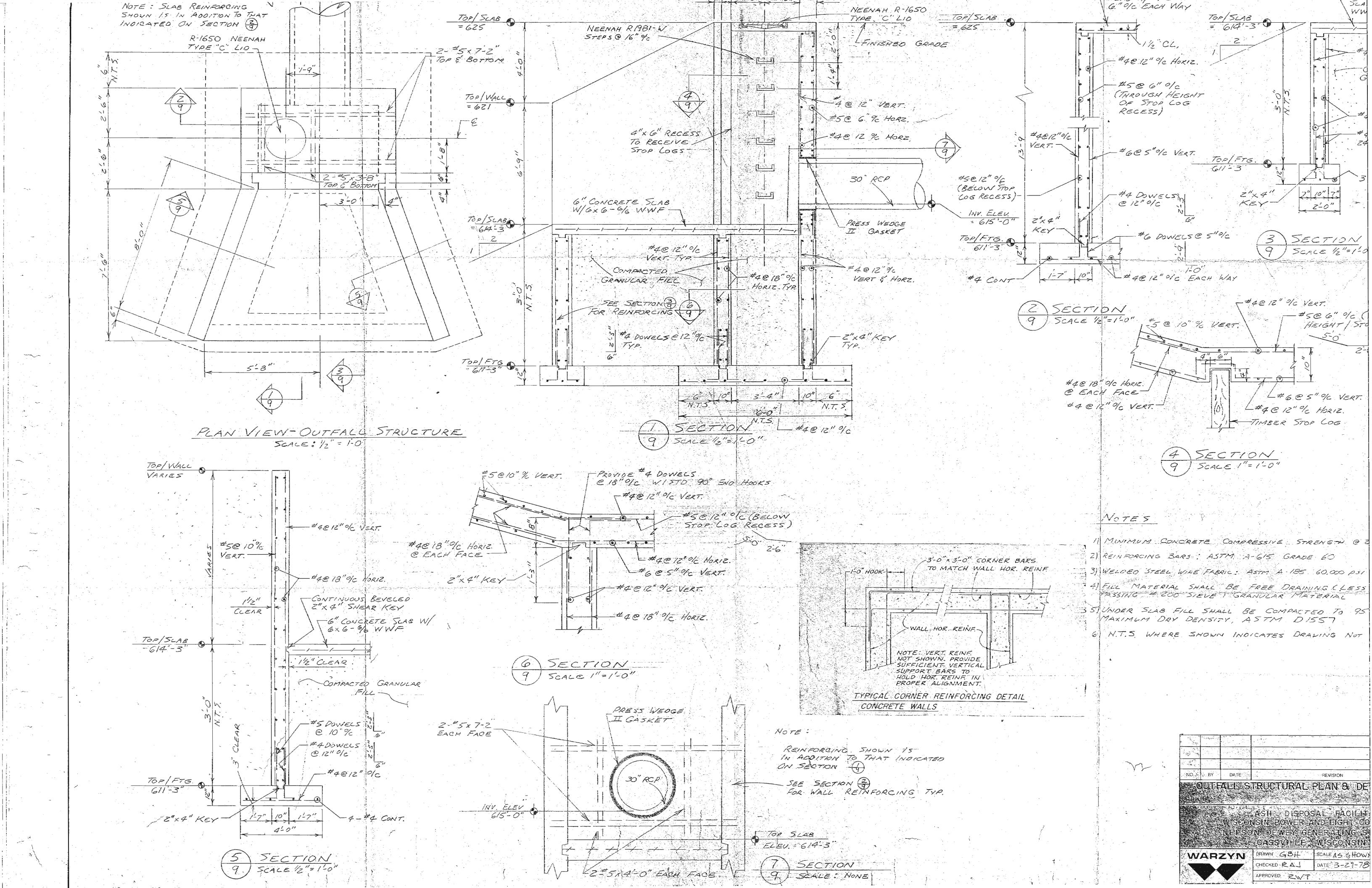


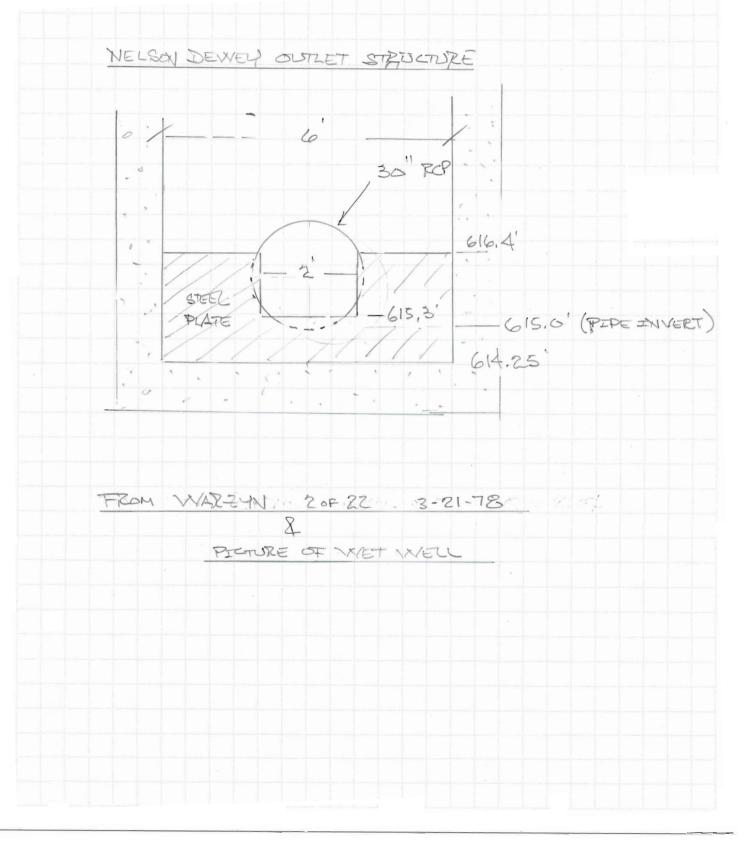
APPENDIX C – Wet Well and Overflow Weir Information and Picture

Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

Structural Stability Assessment









CASSville - Slag Pond Outlet Discharge Curve

2.5 FT = Pipe Diameter Steel

0.625 FT = Hydraulic Radius

3.1933 k in Q outlet control equation

615 FT = Pipe Inlet Invert Elevation

50 FT = Length

0.025 = n for RCP

0.6 = Co for Inlet Control

614.25 FT = Tail Water Elevation

2 FT = Weir Width (to 616.4')

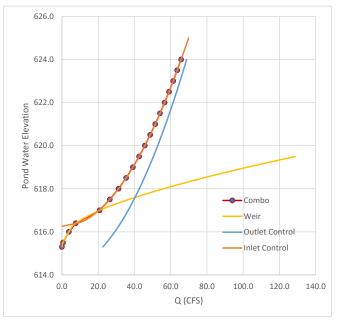
3.3 = Weir Coefficient

OUTLET CONTROL / BARROW CONTROL

Q	Elevation	Head	
CFS		Ft	
22.579	615.3	1.0	
24.636	615.5	1.3	
29.15	616.0	1.8	
33.053	616.5	2.3	
36.541	617.0	2.8	
39.725	617.5	3.3	
42.671	618.0	3.8	
45.427	618.5	4.3	
48.025	619.0	4.8	
50.489	619.5	5.3	
52.839	620.0	5.8	
55.088	620.5	6.3	
57.249	621.0	6.8	
59.332	621.5	7.3	
61.344	622.0	7.8	
63.292	622.5	8.3	
65.181	623.0	8.8	
67.018	623.5	9.3	
68.805	624.0	9.8	

INLET CONTROL

616.3 616.5 617.0 617.5	Ft 0 0.25 0.75 1.25
616.5 617.0	0.25 0.75
617.0	0.75
617.5	1 25
	1.23
618.0	1.75
618.5	2.25
619.0	2.75
619.5	3.25
620.0	3.75
620.5	4.25
621.0	4.75
621.5	5.25
622.0	5.75
622.5	6.25
623.0	6.75
623.5	7.25
624.0	7.75
624.5	8.25
625.0	8.75
	618.0 618.5 619.0 619.5 620.0 620.5 621.0 621.5 622.0 622.5 623.0 623.5 624.0



Weir Equation

Q = Cw * L * H^1.5

Н	Q		
Ft	CFS	2 foot widt + 4	l' Width
615.3	0.0	0.0	
615.5	0.6	0.6	
616.0	3.9	3.9	
616.4	7.6	7.6	0
617.0	20.8	14.6	6.1
617.5	36.8	21.5	15.2
618.0	56.0	29.3	26.7
618.5	78.0	37.8	40.2
619.0	102.3	47.0	55.3
619.5	128.9	56.8	72.0

Combo Discharge Curve

	. 60 00. 10
615.3	0.0 Weir Control
615.5	0.6
616.0	3.9
616.4	7.6
617.0	20.8 Inlet Control
617.5	26.4
618.0	31.3
618.5	35.4
619.0	39.2
619.5	42.6
620.0	45.8
620.5	48.7
621.0	51.5
621.5	54.1
622.0	56.7
622.5	59.1
623.0	61.4
623.5	63.6
624.0	65.8