



Notification of Intent to Initiate Closure of the
Inactive CCR Surface Impoundment

Prepared for Interstate Power and Light Company
Ottumwa Generating Station
Ottumwa, IA

Issue Date: December 15, 2015
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Prepared by:	 _____	12/01/2015 _____
	D. Jolivet	Date
Reviewed by:	 _____	12/02/2015 _____
	D. Dahlberg	Date
Approved by:	 _____	12/15/2015 _____
	D. Packard	Date



55 East Monroe Street
Chicago, IL 60603-5780 USA

Project No. 13391-014

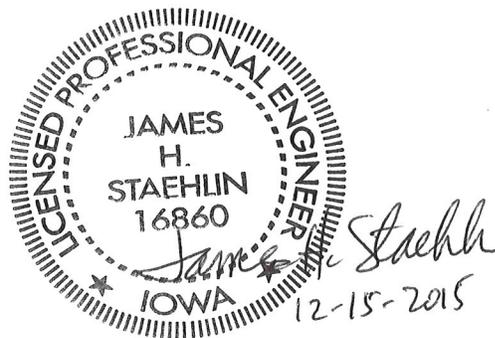
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CERTIFICATION OF REPORT PAGE**NOTIFICATION OF INTENT TO INITIATE CLOSURE OF
INACTIVE CCR SURFACE IMPOUNDMENT
AT OTTUMWA GENERATING STATION**

I certify that this Notification of Intent was prepared by me or under my direct supervision and that I am a registered professional engineer under the laws of the State of Iowa.

**SEAL(S)**

Issue:	Date:	Certified by:
For Use, Rev. 0	12/15/2015	James H. Staehlin

1. Introduction

The Interstate Power and Light Company (IPL) Ottumwa Generating Station, located northwest of Ottumwa, IA, in Wapello County, has one inactive surface impoundment (formally known as the Zero Liquid Discharge (ZLD) Pond) that may contain Coal Combustion Residuals (CCR). The surface impoundment was historically used as storage for stormwater runoff, boiler wash water, air heater wash water; and turbine cleaning wastewater. The surface impoundment no longer receives CCR.

To comply with the requirements of the USEPA Final CCR Rule (40 CFR 257.50-107) published on April 17, 2015 and amended on July 2, 2015, Alliant Energy, on behalf of subsidiary IPL, proposes to close the inactive CCR surface impoundment (ZLD) at Ottumwa Generating Station through removal of the existing CCR before April 17, 2018. Figure 1 identifies the inactive CCR surface impoundment (in red) scheduled for closure in an aerial photograph of the Station.

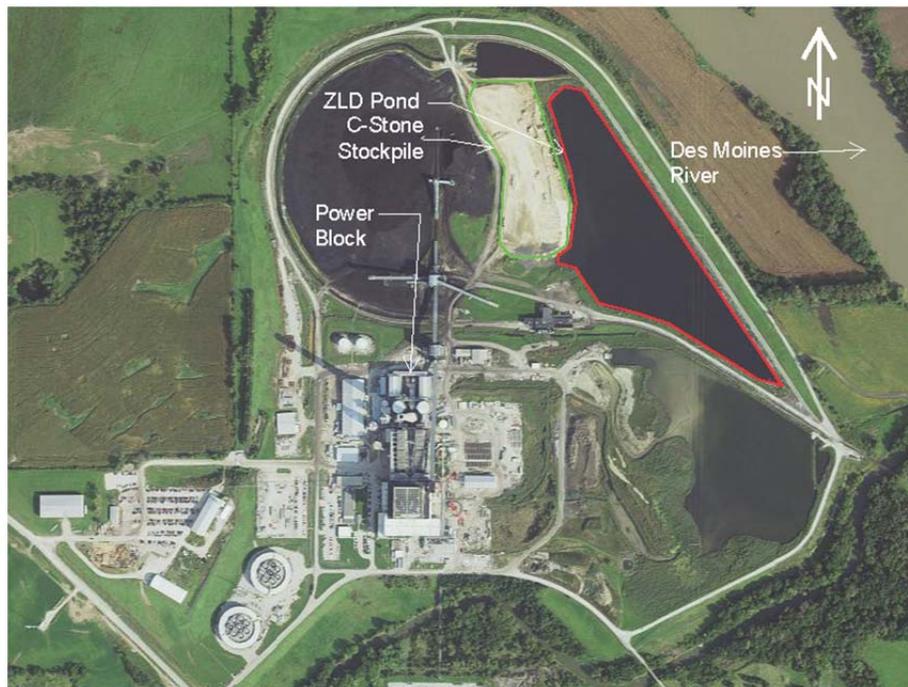


Figure 1 – Inactive CCR Surface Impoundment Location

2. Inactive Classification per CCR Rule

Due to the presence of historic CCR within the pond, the surface impoundment is subject to the requirements of the CCR Rule. However, since the CCR surface impoundment no longer receives CCR as of the effective date of the Rule, yet is believed to contain both CCR and liquids, the impoundment is classified as “inactive.” The CCR Rule addresses “inactive” impoundments independently from impoundments classified as “existing.” The definition for inactive CCR surface impoundments, as defined by §257.53 of the CCR Rule, is listed below for reference.

- *Inactive CCR surface impoundment means a CCR surface impoundment that no longer receives CCR on or after October 19, 2015 and still contains both CCR and liquids on or after October 19, 2015.*

The CCR Rule provides specific closure requirements for inactive CCR surface impoundments (§257.100). IPL intends to close the inactive CCR surface impoundment at the Ottumwa Generating Station pursuant to §257.100(b) of the CCR Rule.

3. Intended Closure Approach

Per CCR Rule §257.100(b), there are two methods by which an owner or operator may close an inactive CCR surface impoundment. The impoundment may be closed by leaving the CCR in place and covering with a cap that satisfies several prescribed performance requirements. Alternatively, the impoundment may be closed by complete removal of CCR, otherwise known as a “clean closure.” The Station currently plans to continue use of the ZLD Pond for low volume wastewater treatment processes after completion of closure. Thus, IPL intends to close the inactive CCR surface impoundment through removal of the CCR.

Removal of the CCR shall be done after temporary dewatering of the ZLD Pond. Prior to reuse of the pond for low volume wastewater storage and treatment processes, the pond will be visually inspected by an independent engineer to ensure that the CCR has been removed.

The contractor will employ best management practices (BMPs) to contain CCR, sediment and decanted water throughout the clean closure operation. BMPs will be implemented during temporary dewatering operations to ensure proper water quality standards and requirements of the Station’s NPDES permit are met. Once CCR removal is complete, all of the removed material will be hauled offsite to the Ottumwa-Midland Landfill (OML), a monofill site located approximately 5 miles east of the station that is used exclusively for CCR disposal. OML is owned and operated by IPL and is licensed by the Iowa Department of Natural Resources.

4. Schedule

Closure of the inactive CCR surface impoundment is anticipated to be commenced, performed and completed according to the following schedule.

Task Description	Expected Task Completion
Complete Site Topographic & Bathymetric Survey	1 st Quarter of 2016
Permitting, Engineering and Contract Development	2 nd Quarter of 2016
Execute Contract with a General Work Contractor	3 rd Quarter of 2016
Dewatering of the Inactive CCR Surface Impoundments (ZLD Pond)	2 nd Quarter of 2017
Removal of all CCR from ZLD Pond	3 rd Quarter of 2017
Certification and Documentation of Closure of the CCR Surface Impoundment	4 th Quarter of 2017

5. Certification

It is S&L's opinion that closure of the Ottumwa Generating Station inactive CCR surface impoundment under §257.100(b)(5) is technically feasible within the timeframe specified in §257.100(b), with removal of CCR completed by April 17, 2018.