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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 impoundments at the Burlington Generating Station (BGS) 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 Units 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 Impoundments

BGS Ash Seal Pond
BGS Main Ash Pond
BGS Economizer Ash Pond
BGS Upper Ash Pond

Current Management

The BGS Main Ash Pond is currently the primary receiver of bottom ash at BGS. The BGS Main Ash Pond is also a primary receiver of process water flows from the generating plant, which includes flows from the boiler seal water system, waste water from non-chemical metal cleaning (air heater wash and economizer wash), and boiler makeup/blowdown water. The BGS Economizer Pond is the primary receiver of economizer ash that is sluiced from the generating station. The BGS Upper Ash Pond is the downstream receiver of both the BGS Main Ash Pond and BGS Economizer Pond. The BGS Ash Seal Pond is generally operated as a storm water runoff pond as it is no longer a primary receiver of CCR or other process flows from the generating plant. Occasionally, the BGS Ash Seal Pond receives facility process water, such as boiler seal water, if there is an issue with the boiler seal water pumps.

On-site Capacity

All four existing CCR units at BGS are required to close pursuant to 257.101(b)(1). There is no other on-site capacity for the management of CCR.

Off-site Capacity

Bottom ash and economizer ash are wet-generated at BGS. 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. IPL has entered into a consent decree that will lead to either re-fueling the boiler with natural gas or retirement of the facility by

the end of 2021. Both of these outcomes will end the production of CCR at this facility and the placement of CCR in the existing CCR units. IPL is currently evaluating the two options and designing modifications that will enable closure of the existing CCR units in 2022, following the consent decree deadline.

Specific actions taken during this reporting period include:

- Procurement of Owner's Engineer to prepare detailed pond closure designs
- Completion of a geotechnical study to evaluate volume of CCR and CCR characteristics
- Evaluation of an alternative water source to reduce treatment of non-CCR waste waters that are currently managed within the existing CCR units.
- Procurement of Owner's Engineers to design system for managing non-CCR waste waters that currently managed within the existing CCR units.
- 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.

Signed,



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