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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 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 documentation 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

The following conditions have been met:

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

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.)

- (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 units. Specifically, 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.

- (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](mailto:CCRprogram@alliantenergy.com).

Signed,



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