

**Notification of Intent to Close
Coal Combustion Residuals Surface Impoundments – Ash Seal Pond, Main Ash Pond,
Upper Ash Pond, and Economizer Ash Pond
Burlington Generating Station, Burlington, Iowa
Interstate Power and Light Company**

In compliance with 40 CFR 257.102(g), Interstate Power and Light Company (IPL) has prepared this notification of intent to close the existing BGS Ash Seal Pond, Main Ash Pond, Upper Ash Pond, and Economizer Ash Pond, which are existing Coal Combustion Residual (CCR) impoundments at the Burlington Generating Station in Burlington, Iowa.

Closure Narrative

IPL intends to close the BGS Ash Seal Pond, Main Ash Pond, Upper Ash Pond, and Economizer Ash Pond through the removal and consolidation of CCR material with the installation of a final cover over the CCR that will remain in place in accordance with the CCR Closure Plan and other local, state, and federal requirements. The BGS Ash Seal Pond, Main Ash Pond, Upper Ash Pond, and Economizer Ash Pond are unlined based on the criteria in 40 CFR 257.71(a)(3).

The final cover system installed over CCR that remains in place will have a permeability no greater than 1×10^{-5} centimeters per second (cm/sec), which is lower than the natural subsoils. The final cover system has been approved by the Iowa Department of Natural Resources (IDNR) with Sanitary Disposal Project Permit Number 29-SDP-13-23C and will include the following components:


- 18-inch thick soil infiltration layer, which serves as the infiltration layer required by 40 CFR 257.102(d)(3)(i)(B).
- 6-inch thick vegetative soil layer, which serves as the erosion layer required by 40 CFR 257.102(d)(3)(i)(C).

The final design of the cover system accommodates settling and subsidence.

**STATEMENT OF CERTIFICATION
BY QUALIFIED PROFESSIONAL ENGINEER**

40 CFR 257.102(d)(3)(iii) – Design of Final Cover System Meets 257.102(d)(3)

I, Eric J. Nelson, being an engineer licensed by the State of Iowa with Professional Registration No. 23136, certify that the design of the final cover system meets the requirements in 257.102(d)(3), based on the design activities completed at this time.


Signature



August 31, 2023

Date