SCS ENGINEERS



Post-Closure Care Plan

Phase 1 Module 1

- Phase 1 Module 2
- Phase 1 Module 3
- Phase 1 Module 4

Columbia Dry Ash Disposal Facility

Prepared for:

Wisconsin Power and Light Company

Columbia Energy Center W8375 Murray Road Pardeeville, Wisconsin 53954

Prepared by:

SCS ENGINEERS

2830 Dairy Drive Madison, Wisconsin 53718-6751 (608) 224-2830

> October 2018 File No. 25217156.00

Offices Nationwide www.scsengineers.com Post-Closure Care Plan Phase 1 Module 1 Phase 1 Module 2 Phase 1 Module 3 Phase 1 Module 4

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2 Post-Closure Care Plan

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PE CERTIFICATION

ERIC J. NELSON	I, Eric J. Nelson, hereby certify that this Post-Closure Care Plan meets the requirements of 40 CFR 257.104(d), was prepared by me or under my direct supervision, and that I am a duly licensed Professional Engineer under the laws of the State of Wisconsin.
BO STITZER, WIS.	10/12/2018 (signature) (date)
	Eric J. Nelson (printed or typed name)
	License number <u>E-37855-6</u>
	My license renewal date is July 31, 2020
	Pages or sheets covered by this seal: Post-Closure Care Plan, October 2018

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1.0 INTRODUCTION AND PROJECT SUMMARY

On behalf of Wisconsin Power and Light Company (WPL), SCS Engineers (SCS) has prepared this Post-Closure Plan for the Columbia (COL) Dry Ash Disposal Facility Phase 1 Modules 1 through 4 as required by 40 CFR 257.104, as stated below.

<u>40 CFR 257.104(d).</u> "Written post-closure plan – (1) Content of the plan. The owner or operator of a CCR unit must prepare a written post-closure plan that includes, as a minimum, the information specified in paragraphs (d)(1)(i) through (iii) of this section."

The COL facility includes an active coal combustion residue (CCR) landfill, which currently consists of four CCR units, all located in Phase 1 of the facility.

- **Phase 1, Module 1**. This unit has received final cover over completed outer sideslope areas that will no longer receive additional CCR; intermediate cover has been placed over remaining areas. The final cover placed complies with the CCR Rule.
- **Phase 1, Module 2**. This unit has received intermediate cover over a majority of the in-place CCR.
- **Phase 1, Module 3**. This unit is currently being filled.
- **Phase 1, Module 4**. This unit was constructed in 2018 and is approved by the Wisconsin Department of Natural Resources (WDNR) to receive CCR.

Phase 1, Module 4 is a new CCR landfill, as defined in 40 CFR 257.53. Future CCR units (Phase 1, Modules 5 through 6 and Phase 2, Modules 7 through 13) are permitted with the WDNR, but have not been developed. The site location is shown on **Figure 1**. **Figure 2** shows proposed final cover grades and monitoring locations. Future CCR units are not addressed by this plan and are not discussed further herein.

Phase 1, Module 1 has been partially closed with a final cover as described in the Initial Closure Plan for this CCR unit. The remaining open areas of this CCR unit will be closed when CCR materials reach final waste grades, as described in the Plan of Operations approved by the WDNR. The future final cover system is planned to be the same as the existing final cover system. Following the closure of the existing CCR units at COL, WPL will conduct post-closure care in accordance with 40 CFR 257.104(b) for the required 30 years.

2.0 MONITORING AND MAINTENANCE ACTIVITIES

<u>40 CFR 257.104(d)(1)(i).</u> "A description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed."

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Monitoring and Maintenance Activities	Frequency
Mowing	Semi-Annually
Inspections by Owner/Operator	Monthly
Repair to Final Cover for Erosion Concerns	As needed, determined by inspection
Sedimentation Basin Cleaning	As needed, determined by inspection
Leachate Collection Line Cleaning	Annually
Environmental Monitoring (groundwater, leachate)	Semi-Annually

The owner/operator will perform monthly inspections of the landfill surface, leachate control system, and groundwater monitoring systems. If issues are noticed during the inspection, action will be taken to remedy the situation. Eroded areas will be repaired and reseeded. Repairs or replacement will be performed on the groundwater monitoring system as needed.

2.1 FINAL COVER MAINTENANCE

Mowing will be performed semi-annually during the growing season unless additional mowing is required in response to the vegetation growth rate. During monthly inspections, if eroded areas are noted, WPL will repair and reseed the area.

2.2 LEACHATE COLLECTION AND REMOVAL SYSTEM MAINTENANCE

Phase 1, Modules 1 through 3 at the COL facility are all existing CCR landfills under the Federal CCR Rule (40 CFR 257, Subpart D) and are not subject to the requirements of 257.70; therefore, leachate collection and removal system maintenance is not required for these units. However, the leachate collection and removal system for these units will be maintained to meet state requirements.

Phase 1, Module 4 of the facility is a new unit constructed in 2018. When opened, this unit will be a new CCR landfill as defined in 40 CFR 257.53. Phase 1, Module 4 is in compliance with the requirements of 40 CFR 257.70, as demonstrated in the Liner and Leachate Collection System Design Compliance Demonstration report.

2.3 GROUNDWATER MONITORING AND SYSTEM MAINTENANCE

Groundwater monitoring wells MW-33AR, MW-34A, MW-84A, MW-301, MW-302, MW-309, MW-310, and MW-311 will be maintained and sampled semi-annually for the parameters listed in Appendix III to Part 257 and in accordance with 40 CFR 257.90-98.

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3.0 POST-CLOSURE PERIOD CONTACTS

<u>40 CFR 257.104(d)(1)(ii).</u> "The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure period."

The contact information for COL during the post-closure period is as follows:

Columbia Energy Center Attn: Plant Manager W8375 Murray Road Pardeeville, WI 53954 (608) 742-0711 CCRProgram@alliantenergy.com

4.0 POST-CLOSURE PERIOD SITE USE

<u>40 CFR 257.104(d)(1)(iii).</u> "A description of the planned uses of the property during the postclosure period. Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system or the function of the monitoring systems unless necessary to comply with the requirements of the subpart..."

The final use of the COL Dry Ash Disposal Facility will be privately owned green space. With this use, there will be no disturbance of the final cover or any other landfill-related components.

5.0 CERTIFICATIONS

<u>40 CFR 257.104(d)(4).</u> "The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the initial and any amendment of the written post-closure plan meets the requirements of this section."

Eric Nelson, PE, a licensed profession engineer in the State of Wisconsin, has overseen the preparation of this Post-Closure Care Plan. A certification statement is provided on **page iii** of this plan.

6.0 RECORDKEEPING AND REPORTING

<u>40 CFR 257.104(b)(2)(iii).</u> "The owner or operator has completed the written post-closure plan when the plan including the certification required by paragraph (d)(4) of this section, has been placed in the facility's operating record as required by Section 257.105(i)(4)."

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The Post-Closure Care Plan will be placed in the facility's operating record and on Alliant Energy's CCR Rule Compliance Data and Information website, as will all amendments.

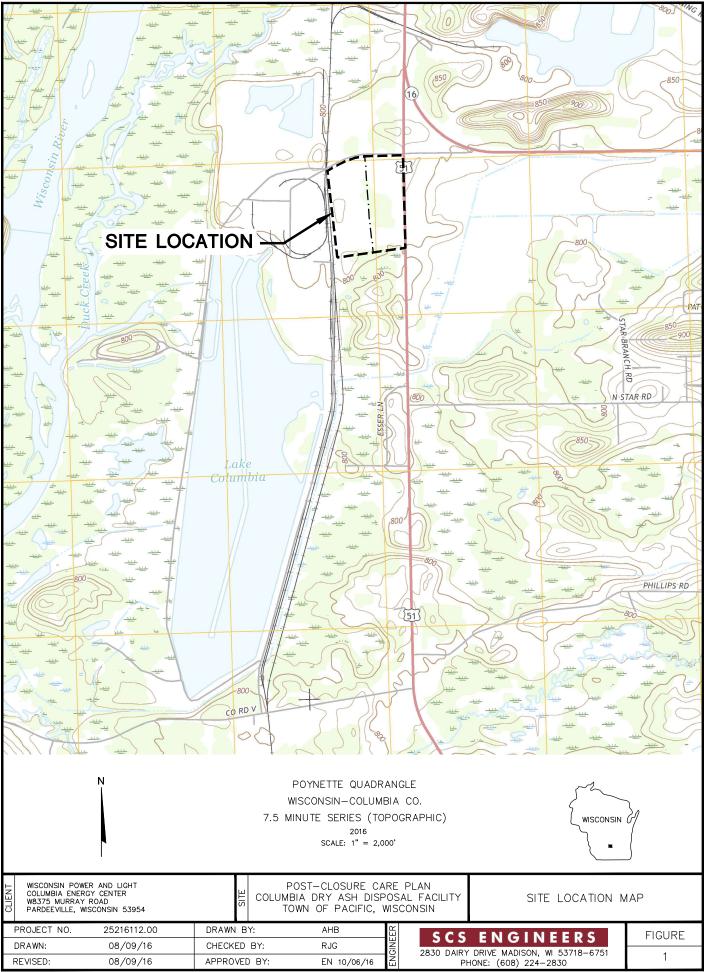
WPL will amend the Post-Closure Care Plan if there is a change in operation of the CCR unit that affects the written Post-Closure Care Plan or, if after post-closure activities have started, unexpected events cause a revision of the plan.

WPL will provide notification of completion of the post-closure care no later than 60 days following the completion of the post-closure care period. The notification will include certification by a qualified professional engineer verifying that post-closure care has been completed in accordance with the plan. The notification will be placed in the facility's operating record and on the website.

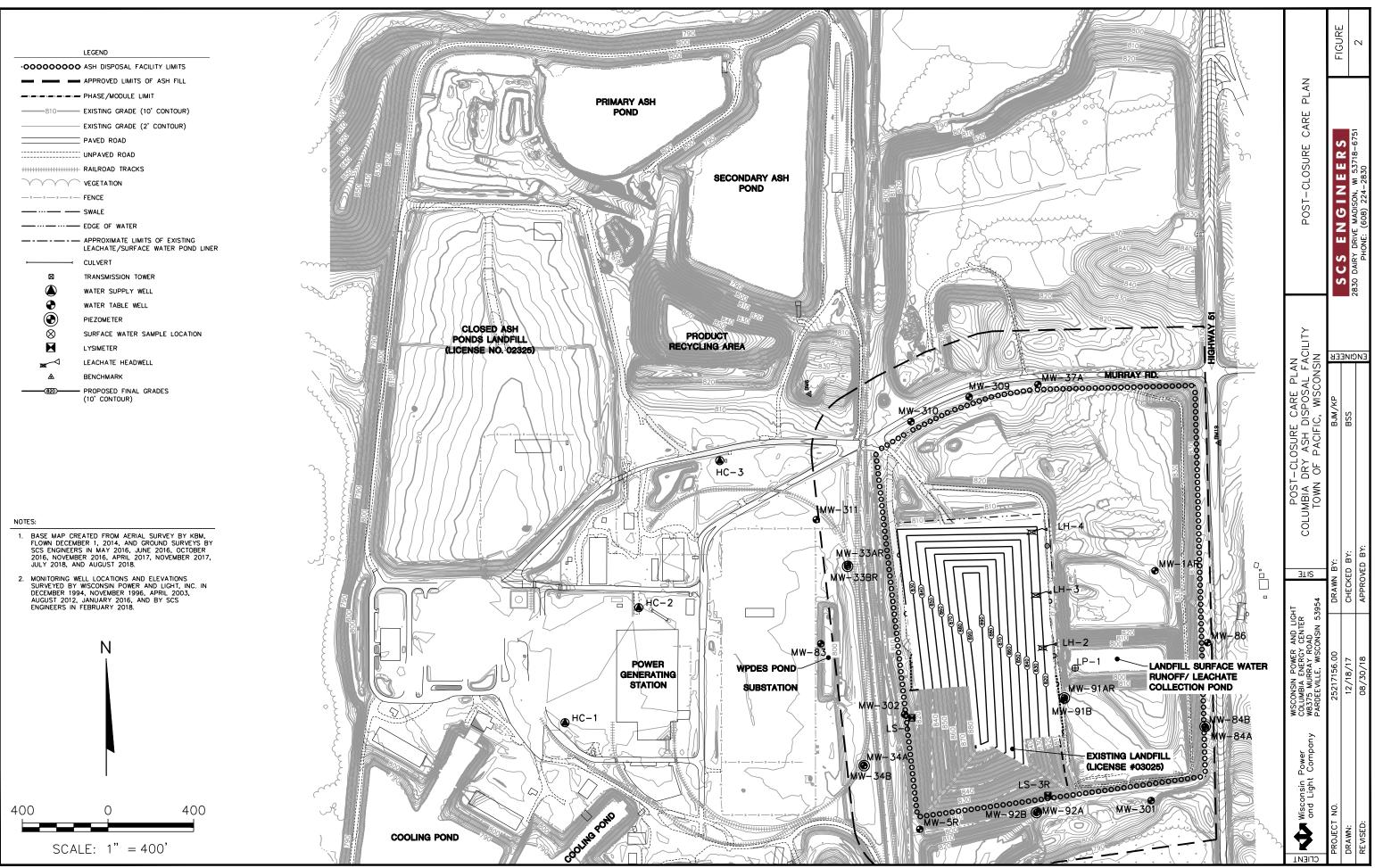
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FIGURES

- 1
- Site Location Map Post-Closure Care Plan 2



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