January 31, 2025
File No. 25224152.00

Mr. Brian Clepper
Columbia Energy Center
W8375 Murray Rd.
Pardeeville, WI 53954

Subject: Groundwater Monitoring System Update - Certification
Columbia Dry Ash Disposal Facility, Pardeeville, Wisconsin

Dear Mr. Clepper:

This letter certifies, pursuant to 40 CFR 257.91(f), that the groundwater monitoring system at the Columbia Dry Ash Disposal Facility (COL) is designed and constructed to meet the requirements of 40 CFR 257.91 and NR 507.15(3). The monitoring network is sufficient to accurately represent the quality of background groundwater that has not been affected by leakage from the coal combustion residual (CCR) unit and the quality of groundwater passing the waste boundary of the CCR unit.

This monitoring system update includes the following changes to the monitoring system:

- Change to a single multiunit monitoring system for Modules (MOD) 1-3, MOD 4-6, MOD 10-11, and MOD 12-13.
- Addition of MW-317, MW-318, and MW-319 to the monitoring system.
- Removal of MW-313, MW-314, and MW-315 from the monitoring system.

Under the CCR Rule, MOD 1-3 is considered an existing landfill. MOD 4-6 is considered to be a new landfill CCR unit because construction began after October 19, 2015. MOD 10-11 and MOD 12-13 are lateral expansions of a new CCR unit made after October 19, 2015. As of the date of this certification, construction of MOD 12-13 is in progress. The existing CCR landfill unit and new CCR landfill units are contiguous.

Previously, monitoring wells MW-313, MW-314, and MW-315 were the compliance monitoring wells for landfill MOD 10-11. These wells were located within the approved footprint of MOD 12; therefore, MW-313, MW-314, and MW-315 were abandoned during construction of MOD 12-13 in accordance with Wisconsin requirements to remove the wells from the new disposal area. MW-317, MW-318, and MW-319 were installed to the north (downgradient) of MOD 12-13 prior to the start of MOD 12-13 construction and prior to the abandonment of MW-313, MW-314, and MW-315.

Based on the design information developed for placement in the site Operating Record to meet the requirements of 40 CFR 257.105(h)(2) and NR 506.17(2)(e) and provided for our review, the number, spacing, and depths of the monitoring system components were determined using site-specific information in accordance with 40 CFR 257.91(b) and NR 507.15(3)(b).

The groundwater monitoring system now consists of two upgradient and nine downgradient monitoring wells, which exceeds the minimum requirements of 40 CFR 257.91(c)(1) and NR 507.15(3)(c)(1).

As described above, the groundwater monitoring system for COL is being updated to a single multiunit system. Previously, landfill MOD 1-3, MOD 4-6, and MOD 10-11 had separate groups of downgradient compliance wells. Modules 12-13 are currently under construction and are being incorporated into the multiunit system with this update. The COL Ash Disposal Facility includes the following CCR units that are contiguous:

- COL MOD 1-3 (existing CCR landfill)
- COL MOD 4-6, MOD 10-11, and MOD 12-13 (new CCR landfill)

The groundwater monitoring system is equally as capable of detecting monitored constituents at the waste boundary of the CCR units as the individual groundwater monitoring system specified in 40 CFR 257.91(a) through (c), as required by 40 CFR 257.91(d).

Based on the installation documentation developed for placement in the site Operating Record to meet the requirements of 40 CFR 257.105(h)(2) and NR 506.17(2)(e) and provided for our review, the monitoring wells have been cased in a manner that will maintain the integrity of the monitoring well borehole and were constructed in accordance with the requirements of 40 CFR 257.91(e) and NR 507.15(3)(e).

PE Certification

I, Sherren C. Clark, hereby certify that the groundwater monitoring system at the Columbia Dry Ash Disposal Facility has been designed and constructed to meet the requirements of 40 CFR 257.91. This certification is based on my review of documentation in the operating record regarding the design, installation, and development of the groundwater monitoring system components. I am a duly licensed Professional Engineer under the laws of the State of Wisconsin.

(signature) January 31, 2025 (date)

Sherren Clark
(printed or typed name)

License number _____29863-06_____

My license renewal date is July 31, 2026.

Pages or sheets covered by this seal:
Groundwater Monitoring System Certification Update, all pages.

Sincerely,

Sherren C. Clark, PE
Project Director
SCS Engineers

Thomas J. Karwoski, PG
Senior Project Manager
SCS Engineers

MDB/AJR_jsn/TK/SCC

cc: Jeff Maxted, Alliant Energy
Matt Bizjack, Alliant Energy

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