

January 21, 2022
File No. 25221067.00

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

Subject: Groundwater Monitoring System Certification Update
Columbia Dry Ash Disposal Facility, Modules 1-3, Pardeeville, Wisconsin

Dear Mr. Clepper:

The groundwater monitoring system at the Columbia Dry Ash Disposal Facility, Modules 1-3 (COL MOD 1-3) was originally certified to meet the requirements of 40 Code of Federal Regulations (CFR) 257.91 on October 11, 2017. The original groundwater monitoring system consisted of two upgradient and three downgradient monitoring wells, which exceeds the minimum requirements of 40 CFR 257.91(c)(1). Based on monitoring data collected since the original certification, a fourth downgradient monitoring well (MW-1AR) has been added to the groundwater monitoring system. This letter provides the updated groundwater monitoring system certification.

The groundwater monitoring system at COL MOD 1-3 is designed and constructed to meet the requirements of 40 CFR 257.91. 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.

Based on the design information 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).

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

The groundwater monitoring system for COL MOD 1-3 was initially identified as a multiunit system monitoring the following CCR units:

- COL Dry Ash Disposal Facility – Module 1
- COL Dry Ash Disposal Facility – Module 2
- COL Dry Ash Disposal Facility – Module 3



These three modules were subsequently recognized as a single existing landfill CCR unit; therefore, the groundwater monitoring network is now identified as monitoring a single CCR unit.

The groundwater monitoring system is designed to detect monitored constituents at the waste boundary of the facility as required by 40 CFT 257.91(d).



Based on the installation documentation 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).

PE Certification

	<p>I, Sherren C. Clark, hereby certify that that the groundwater monitoring system at the Columbia Dry Ash Disposal Facility, Modules 1-3, 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.</p>
	<p> 1/21/2022</p>
	<p>(signature) (date)</p>
	<p>Sherren Clark (printed or typed name)</p>
	<p>License number <u>29863-06</u></p> <p>My license renewal date is July 31, 2022.</p>
	<p>Pages or sheets covered by this seal: Groundwater Monitoring System Certification Update, all pages.</p>

Sincerely,



Sherren C. Clark, PE
 Project Director
 SCS Engineers



Thomas J. Karwoski, PG
 Senior Project Manager
 SCS Engineers

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cc: Jeff Maxted, Alliant Energy

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