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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 impoundment at the Columbia Energy Center (COL) 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 Unit 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 unit at this facility:

CCR Surface Impoundment

COL Primary Ash Pond

The following conditions have been met:

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

Current Management

The COL Primary Ash Pond is the primary receiver of sluiced bottom ash and economizer ash. The bottom ash discharges into the southeast corner of the COL Primary Ash Pond and the economizer ash discharges into the west side of the COL Primary Ash Pond. The majority of the CCR that is discharged into the COL Primary Ash Pond is removed during maintenance dredging activities. The CCR that is dredged is stockpiled in the western half of the COL Primary Ash Pond for dewatering. Once dewatered the CCR (bottom ash) is sent through a sieve shaker machine to separate coarsely graded CCR from the finely graded CCR. The CCR is then transported off-site for beneficial reuse. The economizer ash, as well as bottom ash fines, are transported to the on-site active dry ash landfill east of the generating plant.

On-site Capacity

The COL Ash Pond is the only existing CCR surface impoundment located at this facility capable of receiving wet-generated CCR, and is required to close pursuant to 257.101(b)(1). An inactive CCR unit is also located on site, but it cannot receive CCR after October 19, 2015. In addition, the inactive CCR unit will be closed through removal of CCR. A CCR landfill is located on-site, but it cannot accept wet-generated CCR. There is no other on-site capacity for the management of wet-generated CCR.

Off-site Capacity

Bottom ash and economizer ash are wet-generated at COL. 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 unit. Specifically, the facility has committed to installing a dry bottom ash handling system by early 2023. The installation of this system will end the placement of wet-generated CCR in the COL Primary Pond and enable closure of the CCR unit in 2023.

- (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. WPL 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.

Signed,



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