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February 28, 2022

VIA Electronic Mail

Attn: Kirsten Hillyer
Materials Recovery and Waste Management Division
Office of Resource Conservation and Recovery
United States Environmental Protection Agency

Re: CCR Rule Part A Demonstration - Request for Additional Information
Columbia Energy Center
Wisconsin Power and Light Company
Town of Pacific, Wisconsin

Dear Ms. Hillyer:

Wisconsin Power and Light Company (WPL), a wholly owned subsidiary of Alliant Energy Corporation, received a request for additional information to assist the United States Environmental Protection Agency (EPA) determine whether the facility is on track to meet the site-specific deadline to cease placement of CCR in the Primary Pond and initiate closure of the CCR unit. The requested information is provided below.

1) *A narrative explaining the progress made and current activities and phase/step at the facility to achieve alternative capacity.*

As EPA is aware, the Columbia Energy Center (COL) submitted a demonstration pursuant to 40 CFR 257.103(f)(1) on November 20, 2020, requesting a site-specific deadline of October 31, 2022 to initiate closure of the Primary Pond. The demonstration included detailed information regarding the installation of a new bottom ash handling system at the facility and a schedule for completing the work. On January 11, 2022, EPA determined the demonstration to be complete and confirmed that the deadline to cease placement of CCR and non-CCR wastewaters in the Primary Pond is tolled pending a final decision. I am pleased to report that the work we described in our November 2020 demonstration remains on track, and we have completed a significant amount of work since the demonstration was submitted. A list of the most significant project milestones follows:

- Limited Notice to Proceed (LNTP) contract awarded to the Engineer Procure Construction (EPC) contractor, UCC Environmental, on November 24th, 2020 to start the engineering for the Bottom Ash Conversion Project.
- An application for Certificate of Authority was filed with the Public Service Commission of Wisconsin to install the new bottom ash handling system on February 3rd, 2021.
- A second LNTP was awarded to UCC Environmental on March 8th, 2021 to complete engineering to the point where material could be purchased for the Bottom Ash Conversion Project immediately following Full Notice to Proceed (FNTP) approval.

- The Public Service Commission of Wisconsin issued a Certificate of Authority to proceed with construction on July 1, 2021.
- FNTP contract awarded to UCC Environmental on July 19th, 2021
- Start of construction occurred on September 13th, 2021
- Submitted Plan and Specification for the Bottom Ash Conversion and Water Treatment Project to the Wisconsin Department of Natural Resources (WDNR) on September 28th, 2021
- Submittal of WPDES permit amendment on December 6th, 2021. In Wisconsin, this is submitted following WDNR review of proposed Plans and Specifications for any change to a wastewater treatment system. The permit amendment was requested verbally by WDNR prior to issuance of the formal approval (next item).
- Received Plan and Specification approval from WDNR for rerouting Air Heater Wash sumps, Chemical Waste sump and Duck Pond water through WPDES Outfall 301 on December 15th, 2021.
- Concrete foundations completed on December 17th, 2021
- Clarifier arrived on site on February 1st, 2022
- Conveyor is scheduled to ship between April 7th, 2022 and April 14th, 2022
- NPDES permit for rerouting non-CCR wastewater anticipated by June 1, 2022.
- End discharges of CCR and non-CCR wastewater to the Primary Pond, October 31st, 2022

During execution of the project, WPL has made noteworthy adjustments to the execution approach. Most significantly, WPL has determined that a scheduled outage to tie in the new bottom ash system is not required for this site. Due to the site-specific deadline being near the end of a period of high-power generation demand and no other outages in the plans that coincided with project schedule, the project challenged itself to tie in the new system in a safe manner that would allow both of the COL units to stay online. WPL has also determined that a commissioning period is required to verify that the system meets the performance specifications and can be relied upon to manage the facility's bottom ash safely and effectively. This commissioning period is scheduled to occur between June 7th, 2022 and September 15th, 2022 and will involve tying in the various plant systems (Bottom Ash, Economizer Ash and Pyrites individually from both units) into the Remote Drag Chain Conveyor System in sequence. We expect discharges to the Primary Pond to permanently end after the commissioning period, on or slightly before the requested October 31, 2022 deadline.

While the project is on track to be completed on or slightly ahead of schedule, we are closely monitoring issues that have the potential to create delays. This includes delayed delivery of the conveyor system, which was originally set to arrive on or before March 15 but is now projected to arrive April 14th due to manufacturing and shipping delays. We are also following additional supply chain constraints, impacts related to the global pandemic, and the labor market. At this time, we believe these issues can be mitigated through shift adjustments and adjustments to the installation sequence, and therefore believe the October 31, 2022 date that was originally requested remains appropriate.

Based on this progress, WPL remains on track to meet the October 31, 2022 date to cease placement of waste and initiate closure of the Primary Pond, and we will keep EPA apprised of any challenges that would potentially warrant a change in the site-specific deadline.

2) *A discussion of the issues that led to the delay (if a delay has occurred) to the requested date to cease receipt of waste.*

No delay to the requested date has occurred at this time.

3) *An updated requested date to cease receipt of waste (if the original date requested has changed).*

WPL is not requesting a change to the site-specific deadline to cease placement of CCR and non-CCR wastewaters in the Primary Pond.

4) *An updated narrative justifying the new date to cease receipt of waste (if the original date requested has changed).*

No additional justification is required because WPL is not requesting a change to the site-specific deadline to cease placement of CCR and non-CCR wastewaters in the Primary Pond.

We understand that EPA has found the initial demonstrations to be far more complex than initially anticipated and are thus taking much more time to review. WPL has made significant progress toward completing the bottom ash handling system over the past fifteen months, while EPA has been considering the Part A demonstrations. We appreciate EPA's outreach to request additional information and look forward to answering any additional questions EPA may have on this response or the November 2020 demonstration prior to any proposed decision. If you need further information, please contact me at EricSandvig@alliantenergy.com or Jeff Maxted at JeffreyMaxted@AlliantEnergy.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Sandvig". The signature is fluid and cursive, with the first name "Eric" and last name "Sandvig" clearly distinguishable.

Eric Sandvig

Director of Operations – Columbia Energy Center