Notification of Intent to Initiate Closure of Inactive Coal Combustion Residuals Surface Impoundment Secondary Ash Pond Columbia Energy Center, Pardeeville, Wisconsin Wisconsin Power and Light Company

In compliance with 40 CFR 257.100, Wisconsin Power and Light Company (WPL) intends to initiate closure of the Secondary Ash Pond, which is an inactive Coal Combustion Residual (CCR) impoundment at the Columbia Energy Center in Pardeeville, Wisconsin.

## Impoundment Status under CCR Rule (40 CFR 257)

The Secondary Ash Pond is inactive as defined in 40 CFR 257.53. According to WPL, the Secondary Ash Pond stopped receiving CCR prior to October 19, 2015. The Secondary Ash Pond still contains CCR that was received by the impoundment prior to October 19, 2015, and not subsequently removed. The Secondary Ash Pond also currently contains liquids.

## **Closure Narrative**

WPL intends to close the Secondary Ash Pond by removing the CCR to meet the requirements in 40 CFR 257.100(b)(5). Based on information available as of the date of this notification, which includes initial field observations from a sediment thickness survey of the Secondary Ash Pond completed in open water areas on December 3, 2015, and preliminary volume estimates of accumulated CCR at the west end of the pond where there is no open water. Accumulated sediment and CCR will be removed from the impoundment and disposed appropriately. There is no liner in the Secondary Ash Pond to be removed to close the pond.

## **Schedule of Closure Activities**

The schedule for closure activities is based in part on the estimated volume of CCR in the Secondary Ash Pond described above. Scheduled actions to complete the closure activities include the following:

TASK	CLOSURE ACTIVITIES	START DATE OR MONTH	END DATE OR MONTH
1	Notification of Intent to Close		December 17, 2015
2	Project Development	December 2015	February 2016
3	Engineering	February 2016	June 2016
4	Permitting	February 2016	June 2016
5	Procurement	June 2016	August 2016
6	Construction	September 2016	November 2017
7	Complete Closure Documentation and Notification of Completion	November 2017	February 2018

## STATEMENT OF CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

40 CFR 257.100(b)(4) - Design of Final Cover System Meets 257.100(b)(3)

Not Applicable. Impoundment to be closed through removal of CCR per 257.100(b)(5).

40 CFR 257.100(b)(6) - Technical Feasibility of Completion Before April 17, 2018.

I, <u>Eric J. Nelson</u>, being an engineer licensed by the State of Wisconsin with Professional Registration No. 37855-6, certify that the approach and schedule described in this Notification of Intent to Initiate Closure is technically feasible to complete by April 17, 2018, based on the information available to me at this time.

Signature

ERIC J.

12-14-2015 Date