April 15, 2025
File No. 25224067.00

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

Subject: Groundwater Monitoring System Update - Certification
Columbia Energy Center Former Primary Ash Pond, Pardeeville, Wisconsin

Dear Mr. Clepper:

The groundwater monitoring system at the Columbia Energy Center (COL) former Primary Ash Pond has been updated to replace MW-303 with MW-316. The monitoring network was originally certified on October 11, 2017. A prior update to the network, replacing MW-304 with MW-304R, was certified on September 26, 2024.

This letter certifies, pursuant to 40 CFR 257.91(f), that the monitoring system 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 residuals (CCR) unit, and the quality of groundwater passing the waste boundary of the CCR unit.

MW-316 is replacing MW-303 in the monitoring network as follows:

- MW-303 was installed in 2015 as close as practicable to the boundary of the CCR unit.
  - The area between the Primary Ash Pond and the location of MW-303 includes access roads, utilities, and a building.
  - At the time MW-303 was installed, this area was also being used for active ash management and beneficial use activities.
- MW-316 was installed in 2023 as close as practicable to the boundary of the CCR unit.
- MW-316 is located between the CCR unit boundary and MW-303 and is approximately 550 feet closer than MW-303 to the CCR unit boundary.
- MW-316 is screened across the water table, as is MW-303.

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 downgradient

monitoring well locations are based on historically radial groundwater flow directions observed when the CCR unit was active. Groundwater mounding and radial outward flow observed at the Primary Pond prior to pond closure have decreased following closure; however, MW-316 is positioned to represent sample groundwater quality in an area that was previously downgradient and could have been impacted by CCR constituents passing the waste boundary of the CCR unit when the unit still contained CCR.

The groundwater monitoring system at the COL Former Primary Ash Pond monitors a single closed CCR unit:

- Former Primary Ash Pond

The groundwater monitoring system is designed to detect monitored constituents at the waste boundary of the CCR unit as required by 40 CFR 257.91(c).

Based on the installation documentation placed in the site operating record to meet the requirements of 40 CFR 257.105(h)(2) 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).

PE Certification

<table>
<tr>
<td rowspan="4"> 
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<td>I, Sherren C. Clark, hereby certify that the groundwater monitoring system at the Columbia Energy Center Former Primary Ash Pond 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.

4/15/2025</td>
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<tr>
<td>(signature) (date)

Sherren Clark</td>
</tr>
<tr>
<td>(printed or typed name)

License number 29863-6

My license renewal date is July 31, 2026.

Pages or sheets covered by this seal:

Groundwater Monitoring System Update – Certification,</td>
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<td>all pages.</td>
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Sincerely,

Sherren Clark, PE
Project Director
SCS Engineers

Thomas J. Karwoski, PG
Senior Project Manager
SCS Engineers

MDB/jsn/SCC/TK

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

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