

February 19, 2026  
File No. 25224280.01

Dr. Megan Hawkins  
Edgewater Generating Station  
3739 Lakeshore Drive  
Sheboygan, WI 53081

Subject: Groundwater Monitoring System Update – Certification  
I-43 Ash Disposal Facility, Town of Wilson, Wisconsin

Dear Dr. Hawkins:

The groundwater monitoring system at the I-43 Ash Disposal Facility (I43) has been updated. The monitoring network was originally certified on October 11, 2017. The certification was updated on April 14, 2025, to add MW-306 to the monitoring network. The current update adds the Contact Water Swale Module to the list of existing CCR units monitored by the multi-unit monitoring system.

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 system also meets the requirements of NR 507.15(3). 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.

Data from the groundwater monitoring system at the site will continue to be evaluated using the statistical method certified on October 11, 2017, in accordance with the requirements of 40 CFR 257.93(f).

The groundwater monitoring system at I-43 is a multi-unit system for the following CCR units:

- Phase 3, Module 1 (Existing CCR landfill)
- Phase 3, Module 2 (Existing CCR landfill)
- Phase 4, Module 1 (Existing CCR landfill)
- Contact Water Swale Module (New CCR landfill)

These modules are managed as a single landfill by the facility and regulated under a single solid waste landfill license by the Wisconsin Department of Natural Resources. Construction of the Contact Water Swale Module began in 2025, and CCR placement in this module is anticipated to begin in 2026. The Contact Water Swale Module is a lateral expansion of the active landfill; however it is considered a new CCR landfill under the CCR Rule due to construction occurring after October 19, 2015 .

Based on the design information developed for placement in the site Operating Record to meet the requirements of 40 CFR 257.105(h)(2) and NR 506.17(2)(e) and 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) and NR 507.15(3)(b).



The groundwater monitoring system consists of two upgradient monitoring wells and four downgradient monitoring wells, which exceeds the minimum requirements of 40 CFR 257.91(c)(1) and NR 507.15(3)(c)(1).

The multi-unit groundwater monitoring system is equally as capable of detecting monitored constituents at the waste boundary of the CCR units as the individual groundwater monitoring system specified in 40 CFR 257.91(a) through (c), as required by 40 CFR 257.91(d).

Based on the installation documentation developed for placement in the site Operating Record to meet the requirements of 40 CFR 257.105(h)(2) and NR 506.17(2)(e) 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) and NR 507.15(3)(3).

## PE CERTIFICATION

	<p>I, Sherren C. Clark, hereby certify that the groundwater monitoring system at the I-43 Ash Disposal Facility 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 style="text-align: center;">  <span style="float: right;">2/19/2026</span> </p>
	<p>(signature) <span style="float: right;">(date)</span></p>
	<p>Sherren Clark        (printed or typed name)</p>
	<p>License number <u>29863-6</u></p> <p>My license renewal date is July 31, 2026.</p> <p>Pages or sheets covered by this seal:</p> <p>Groundwater Monitoring System Update – Certification,        all pages.</p>

Dr. Megan Hawkins  
February 19, 2026  
Page 3

Sincerely,



Sherren Clark, PE, PG  
Project Director  
SCS Engineers



Thomas J. Karwoski, PG  
Senior Project Manager  
SCS Engineers

MDB/jsn/PEG/SCC

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

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