

November 25, 2023  
File No. 25223281.00

Mr. Jeff Maxted  
Alliant Energy  
4902 N. Biltmore Lane  
Madison, WI 53707-1007

Subject: Final Cover Disturbance Demonstration  
CCR Surface Impoundment Closure Area  
Edgewater Generating Station, Sheboygan, WI

Dear Mr. Maxted:

As of August 9, 2021, the closure of the coal combustion residual (CCR) surface impoundments at the Edgewater Generating Station was completed to satisfy the requirements in 40 CFR 257.102. As part of beneficial use investigations, there will be a disturbance of the final cover system for the CCR surface impoundment closure area to drill three exploratory borings. The three borings will include the removal of CCR to obtain samples for laboratory analysis.

In accordance with 40 CFR 257.104(d)(1)(iii), Wisconsin Power and Light Company (WPL) is required to demonstrate that the disturbance of the closed CCR units will not increase the potential threat to human health or the environment. Based on the following, the proposed disturbance will not increase the potential threat to human health or the environment.



- The equipment selected to drill the borings is small and tracked to reduce the impact on the final cover.
- The drilling method selected (sonic) will minimize final cover disturbance and the volume of cuttings generated while maximizing the CCR sample size.
- The borings will be located to avoid areas of the CCR units where geosynthetics were used in the final cover system construction.
- The borings will be abandoned and sealed with bentonite grout that is tremied from the bottom of each boring to the surface, or the top of the compacted cover infiltration layer at a minimum. The boreholes will be checked for settlement after 24 hours, and any settlement will be topped up to the top of the compacted cover infiltration layer at a minimum. The sealing materials will provide a continuous repair of the 24-inch-thick infiltration layer with a permeability no greater than  $1 \times (10)^{-5}$  centimeters per second.
- All work will be performed by a driller licensed in Wisconsin in accordance with Wisconsin Administrative Code requirements.
- Excess cuttings not retained for laboratory analysis will be disposed off site at an appropriate permitted solid waste facility.



- The borings will be located to avoid lined areas of the former CCR surface impoundments, therefore the borings do not pose a risk to the containment system.
- Damage to the 6-inch-thick erosion layer due to the mobilization of the drill rig or the drilling will be repaired, and vegetation restored.

A certification of this demonstration by a qualified professional engineer as required by 40 CFR 257.104(d)(1)(iii) is provided herein.

## PE CERTIFICATION

	<p>I, Eric J. Nelson, hereby certify that the disturbance of drilling through the final cover system of the CCR surface impoundment closure area at the Edgewater Generating Station will not increase the potential threat to human health or the environment per 40 CFR 257.104(d)(1)(iii).</p> <p>This certification is based on my review of the plan for drilling through the closure area cover and proposed restoration. I hereby certify that this document was prepared by me or under my direct personal supervision and that I am a duly registered Professional Engineer under the laws of the State of Wisconsin.</p>
	<p> <u>11/25/2023</u> Eric J. Nelson, PE (date)</p> <p>Wisconsin Registration No. <u>37855-6</u></p> <p>My next renewal date is: <u>7/31/2024</u></p> <p>Pages or sheets covered by this seal: <u>Final Cover Disturbance Demonstration – CCR Surface Impoundment Closure Area dated November 25, 2023.</u></p>

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If you have any questions regarding this certification, please contact Eric Nelson.

Sincerely,



Eric J. Nelson, PE  
Project Director  
SCS Engineers



Thomas J. Karwoski  
Project Manager  
SCS Engineers

EJN/AJR/TK

cc: Jeff Maxted, Alliant Energy  
Jim Jakubiak, WPL Edgewater Generating Station

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