

**Notification of Intent to Close
Coal Combustion Residuals Surface Impoundments
Slag Pond, North A-Pond, South A-Pond, and B-Pond
Edgewater Generating Station, Sheboygan, Wisconsin
Wisconsin Power and Light Company**

In compliance with 40 CFR 257.102(g), Wisconsin Power and Light Company (WPL) has prepared this notification of intent to close four existing Coal Combustion Residuals (CCR) surface impoundments (Slag Pond, North A-Pond, South A-Pond, and B-Pond) at the Edgewater Generating Station in Sheboygan, Wisconsin.

Closure Narrative

WPL intends to close the four impoundments by consolidating CCR within the surface impoundments and installing a final cover system over the CCR that will remain in place. The Slag Pond is lined with clay, and the Slag Pond liner will remain in place.

The final cover system installed over CCR that remains where the impoundments do not have a bottom liner will have a permeability no greater than $1 \times (10)^{-5}$ centimeters per second (cm/sec). This is lower than the natural subsoils documented in previous studies of the site. The final cover system in unlined areas will include the following components:

- 24-inch-thick soil infiltration layer
- 6-inch-thick vegetative soil layer

The final cover system installed over CCR that remains in place in the Slag Pond, which is lined with a 3-foot-thick compacted clay bottom liner according to construction documentation records, will have a permeability no greater than $2.02 \times (10)^{-8}$ cm/sec. This is the average permeability of undisturbed samples of the Slag Pond liner collected during liner construction. The Slag Pond final cover system will include the following components:


- Geosynthetic barrier layer
- Geocomposite drainage layer
- 24-inch-thick rooting zone layer
- 6-inch-thick vegetative soil layer

The final design of both cover systems will accommodate settling and subsidence.

STATEMENT OF CERTIFICATION
BY QUALIFIED PROFESSIONAL ENGINEER

40 CFR 257.102(d)(3)(iii) – Design of Final Cover System Meets 257.102(d)(3)

I, Eric J. Nelson, being an engineer licensed by the State of Wisconsin with Professional Registration No. 37855-6, certify that the design of the final cover system meets the requirements in 257.102(d)(3), based on the design activities completed at this time.



Signature

10/25/2018

Date

