

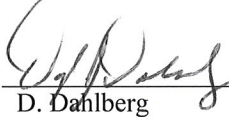




# Post-Closure Plan for Existing CCR Surface Impoundments

Prepared for Wisconsin Power and Light Company  
Edgewater Generating Station

Issue Date: July 29, 2016  
Issue Purpose: For Use

|              |                                                                                                    |                 |
|--------------|----------------------------------------------------------------------------------------------------|-----------------|
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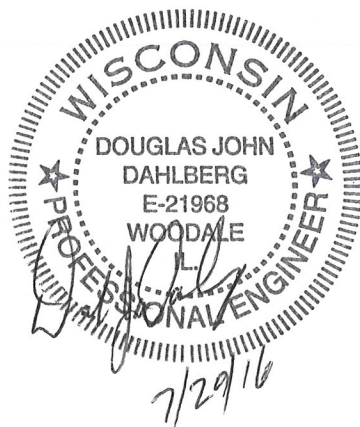


Certification and Seal:

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Project Number: 13391-002

Report Number: SL-013363  
Revision: 0





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## 1. INTRODUCTION AND PURPOSE

**40 CFR 257.104(d)** – “Written post-closure plan – (1) Content of the plan. The owner or operator of a CCR unit must prepare a written post-closure plan that includes, as a minimum, the information specified in paragraphs (d)(1)(i) through (iii) of [section 257.104].”

Pursuant to 40 CFR 257.104(d), Sargent & Lundy (S&L), on behalf of Wisconsin Power and Light Company (WPL), has prepared the following Post-Closure Plan for the four existing CCR surface impoundments – Slag Pond, A-Pond North, A-Pond South, B-Pond – at the Edgewater Generating Station located in Sheboygan, WI. WPL intends to close the four existing CCR surface impoundments by leaving the CCR in place and providing a final cover system in compliance with the requirements of 40 CFR 257.102(d). Following the closure of the CCR surface impoundments, WPL must conduct post-closure care for the CCR units in accordance with 40 CFR 257.104(b). An annotated aerial photograph of the Station’s surface impoundments located west of Lakeshore Drive is included in Figure 1 for reference.



**Figure 1: Edgewater Generating Station Surface Impoundments  
Located West of Lakeshore Dr.**



## 2. MONITORING AND MAINTENANCE ACTIVITIES

**40 CFR 257.104(d)(1)(i)** – “A description of the monitoring and maintenance activities required in paragraph (b) of [section 257.104] for the CCR unit, and the frequency at which these activities will be performed.”

| <b>Monitoring and Maintenance Activities</b>                   | <b>Frequency</b>                                                         |
|----------------------------------------------------------------|--------------------------------------------------------------------------|
| Mow Vegetation                                                 | Semi-Annually (as a minimum)                                             |
| Visual Inspection by Owner / Operator                          | Monthly (as a minimum)                                                   |
| Visual Inspection and Report by Licensed Professional Engineer | As necessary                                                             |
| Repair of Vegetative Cover                                     | As necessary                                                             |
| Repair of Final Cover System                                   | Following observance of settlement, subsidence, erosion, or other events |
| Inspect Groundwater Monitoring System                          | Monthly                                                                  |
| Repair of Groundwater Monitoring System                        | Following observance of an issue                                         |
| Monitor the Groundwater                                        | Semi-Annually                                                            |

### 2.1 Mowing

The Station will perform regular mowing of the final cover system vegetation during the growing season. Mowing will be performed on a semi-annual basis unless additional mowing is required to accommodate vegetation growth rate.

### 2.2 Visual inspection by Owner / Operator

At a minimum, the Owner / Operator will visually inspect the closed impoundments on a monthly basis to identify any problem areas such as erosion, subsidence, settlement or other events. The monthly visual inspection will also include an inspection of the groundwater monitoring system to visually assess the condition of the protective casing and cover system. If problems are observed with the vegetative cover, actions will be taken to reseed the area and maintain the erosion protection provided by the vegetation. Furthermore, should the monthly inspection identify issues concerning the final cover system or the groundwater monitoring system, actions will be taken to make repairs in accordance with the original design.

### 2.3 Visual Inspection and Report by Licensed Professional Engineer

Should the visual inspections by Owner / Operator indicate potential concerns regarding the integrity of the final cover system, a detailed inspection of the closed CCR surface impoundments will be performed by a licensed professional engineer. The professional engineer will visually inspect the surface and side slopes of the closed impoundments to identify any problem areas such as erosion, subsidence, settlement or other events.

## 2.4 Maintain the Groundwater Monitoring System and Monitor the Groundwater

The Station will maintain the groundwater monitoring system and monitor groundwater quality in accordance with the requirements of 40 CFR 257.90 through 257.98. Groundwater monitoring will be performed on a semi-annual basis in accordance with 40 CFR 257.94(b).

## 3. STATION CONTACT NUMBER FOR POST-CLOSURE CARE

**40 CFR 257.104(d)(1)(ii)** – *“The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period.”*

The following contact information is provided if ever a need should arise to discuss the contents or adequacy of this Post-Closure Plan with Station personnel:

Edgewater Generating Station  
Attn: Plant Manager  
3739 Lakeshore Drive  
Sheboygan, WI 53081  
(920) 459-6127  
CCRProgram@alliantenergy.com

## 4. PROPERTY USE DURING POST-CLOSURE CARE PERIOD

**40 CFR 257.104(d)(1)(iii)** – *“A description of the planned uses of the property during the post-closure period. Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system or the function of the monitoring systems unless necessary to comply with the requirements of this subpart...”*

The surface impoundment area is intended to remain as-is in the post-closure condition for the duration of the post-closure care period.

## 5. CERTIFICATIONS

**40 CFR 257.104(d)(4)** – *“The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the initial and any amendment of the written post-closure plan meets the requirements of [section 257.104].”*

It is S&L’s opinion that this written closure plan meets the requirements of 40 CFR 257.104(d).

## 6. REFERENCES

1. 40 CFR Part 257; Environmental Protection Agency Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule, Federal Register, Vol. 80, No. 74, Friday, April 17, 2015, as amended by the Technical Amendments published in the Federal Register on July 2, 2015 Page 37988.
2. "Edgewater Generating Station – Ash Management Area." 43°42'42.95"N and 87°42'46.93" W. GOOGLE EARTH PRO v.6.2. June 1, 2015. September 10, 2015.