



Notification of Intent to Initiate Closure of the
Inactive CCR Surface Impoundment

Prepared for Interstate Power and Light Company
Fox Lake Generating Station
Sherburn, MN

Issue Date: December 11, 2015

Issue Purpose: For Use

Prepared by:



J. Fifarek

12/11/2015

Date

Reviewed by:

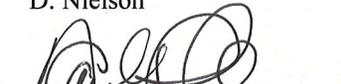


D. Nielson

12/11/2015

Date

Approved by:



D. Packard

12/11/2015

Date

 **Sargent & Lundy** ^{LLC}

55 East Monroe Street
Chicago, IL 60603-5780 USA

Project No. 13391-008

Report No. SL-013125
Revision: 0

LEGAL NOTICE

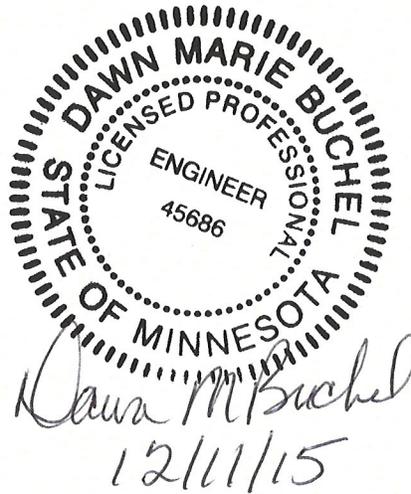
This report ("Deliverable") was prepared by Sargent & Lundy, L.L.C. ("S&L"), expressly for the sole use of Alliant Energy ("Alliant") in accordance with the agreement between S&L and Alliant. This Deliverable was prepared using the degree of skill and care ordinarily exercised by engineers practicing under similar circumstances: (1) S&L prepared this Deliverable subject to the particular scope limitations, budgetary and time constraints, and business objectives of Alliant; (2) information and data provided by others may not have been independently verified by S&L; and (3) the information and data contained in this Deliverable are time sensitive and changes in the data, applicable codes, standards, and acceptable engineering practices may invalidate the findings of this Deliverable. Any use or reliance upon this Deliverable by third parties shall be at their sole risk.



CERTIFICATION OF REPORT PAGE

**NOTIFICATION OF INTENT TO INITIATE CLOSURE OF
INACTIVE CCR SURFACE IMPOUNDMENT
AT FOX LAKE GENERATING STATION**

I certify that this Notification of Intent was prepared by me or under my direct supervision and that I am a registered professional engineer under the laws of the State of Minnesota.



Dawn M Buchel
12/11/15

SEAL(S)

Issue:	Date:	Certified by:
For Use, Rev. 0	12/11/2015	Dawn M. Buchel

1. Introduction

The Alliant Energy Fox Lake Generating Station, located northeast of Sherburn, MN, in Martin County, has one surface impoundment (formally known as the Ash Pond) that contains coal combustion residuals (CCR). The surface impoundment was used as a bottom ash settling pond until the station's conversion to natural gas in 1998. Although the surface impoundment was dredged shortly after the natural gas conversion, it was not verified to be clean nor closed. Rather, the surface impoundment has continued to serve as the Station's settling basin for NPDES permitted low volume waste discharges. To comply with the requirements of the USEPA CCR Final Rule (40 CFR 257.50-107) published on April 17, 2015 and amended on July 2, 2015, Alliant Energy, on behalf of the subsidiary Interstate Power and Light Company (IPL), proposes to close the inactive CCR surface impoundment at the Fox Lake Generating Station through removal of the existing CCR before April 17, 2018. Figure 1 identifies the inactive CCR surface impoundment scheduled for closure in an aerial photograph of the Fox Lake Generating Station.



Figure 1 – Inactive CCR Surface Impoundment Location

2. Inactive Classification per CCR Rule

Due to the presence of historic CCR within the pond, the surface impoundment is subject to the requirements of the CCR Rule. Moreover, since the CCR surface impoundment no longer receives CCR yet still contains both CCR and liquids, the impoundment is classified as “inactive.” The CCR Rule addresses “inactive” impoundments independently from impoundments classified as “existing.” The definition for inactive CCR surface impoundments, as defined by §257.53 of the CCR Rule, is listed below for reference.

- *Inactive CCR surface impoundment means a CCR surface impoundment that no longer receives CCR on or after October 19, 2015 and still contains both CCR and liquids on or after October 19, 2015.*

The CCR Rule provides specific closure requirements for inactive CCR surface impoundments (§257.100). Alliant Energy intends to close the inactive CCR surface impoundment at the Fox Lake Generating Station pursuant to §257.100(b) of the CCR Rule.

3. Intended Closure Approach

Per CCR Rule §257.100(b), there are two methods by which an owner or operator may close an inactive CCR surface impoundment. The impoundment may be closed by leaving the CCR in place and covering with a cap that satisfies several performance requirements. Alternatively, the impoundment may be closed by removal of CCR through a process commonly known in the industry as a “clean closure.” Given that the impoundment has a relatively minimal amount of CCR, and that the Station plans to continue use of the impoundment for NPDES permitted low volume wastes after completion of closure, Alliant Energy intends to close the inactive CCR surface impoundment by removing the CCR. Alliant Energy intends to remove all the CCR, soft sediments and the upper portion of the impoundment subgrade material through the use of a hydraulic dredge. The hydraulic dredge will remove and convey the material to a temporary on-site dewatering area, where the material will be containerized and dewatered prior to being landfilled at a permitted municipal solid waste landfill.

The contractor will employ best management practices (BMPs) to contain CCR, sediment and decanted water throughout the clean closure operation. BMPs will be implemented along the temporary slurry and decant return piping corridors and at the discharge from the inactive CCR surface impoundment to the Cooling Canal. Once dewatering of the dredged material is complete, all of the dredged material will be hauled offsite to a permitted landfill approved by Alliant Energy.

4. Schedule

Closure of the inactive CCR surface impoundment is anticipated to be commenced, performed and completed according to the following schedule.

Task Description	Expected Task Completion
Engineering and Contract Development	1 st Quarter of 2016
Execute Contract with a General Work Contractor	2 nd Quarter of 2016
Dredging of the Inactive CCR Surface Impoundment	3 rd Quarter of 2016
Dewatering, Removal and Disposal of Dredged Pond Sediment and CCR Material	3 rd Quarter of 2016
Certification and Documentation of Closure of the CCR Surface Impoundment	4 th Quarter of 2016

5. Certification

Based on the size of the Fox Lake Generating Station inactive CCR surface impoundment, the selected closure approach and the proposed schedule above, it is S&L's opinion that closure of the CCR surface impoundment under §257.100(b)(5) is technically feasible within the timeframe specified in §257.100(b) with closure complete before April 17, 2018.