### ALLIANT ENERGY Interstate Power and Light Company Lansing Generating Station

#### **CCR SURFACE IMPOUNDMENT**

#### STRUCTURAL STABILITY ASSESSMENT

Report Issued: August 10, 2021 Revision 1





## **EXECUTIVE SUMMARY**

This Structural Stability Assessment (Report) is prepared in accordance with the requirements of the United States Environmental Protection Agency (USEPA) published Final Rule for Hazardous and Solid Waste Management System – Disposal of Coal Combustion Residual from Electric Utilities (40 CFR Parts 257 and 261, also known as the CCR Rule) published on April 17, 2015 (effective October 19, 2015) and subsequent amendments.

This Report assesses the structural stability of each CCR unit at Lansing Generating Station in Lansing, Iowa in accordance with §257.73(b) and §257.73(d) of the CCR Rule. For purposes of this Report, "CCR unit" refers to an existing CCR surface impoundment.

Primarily, this Report is focused on documenting whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded within each CCR unit.



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1 Introduction

The owner or operator of the Coal Combustion Residual (CCR) unit must conduct an

initial and periodic structural stability assessments and document whether the design,

construction, operation, and maintenance of the CCR unit is consistent with recognized

and generally accepted good engineering practices for the maximum volume of CCR and

CCR wastewater which can be impounded therein.

Revision 1 of this Report has been prepared in accordance with the requirements of

§257.73(b) and §257.73(d) of the CCR Rule.

1.1 CCR Rule Applicability

The CCR Rule requires a periodic structural stability assessment by a qualified

professional engineer (PE) for existing CCR surface impoundments with a height of 5 feet

or more and a storage volume of 20 acre-feet or more; or the existing CCR surface

impoundment has a height of 20 feet or more.

1.2 Structural Stability Assessment Applicability

The Lansing Generating Station (LAN) in Lansing, Iowa (Figure 1) has one existing CCR

surface impoundment that meets the requirements of §257.73(b)(1) and/or §257.73(b)(2)

of the CCR Rule, which is identified as the LAN Upper Ash Pond.

2 FACILITY DESCRIPTION

LAN is located approximately three miles southeast of Lansing, Iowa on the western

shore of the Mississippi River in Allamakee County, at 2320 Power Plant Drive, Lansing,

Iowa (Figure 1).

LAN is a fossil-fueled electric generating station that has used four steam turbine electric

generating units throughout its history. Unit 1, Unit 2, and Unit 3 were retired by 2014

and Unit 4 is the only operating unit. Sub-bituminous coal is the primary fuel for

producing steam at LAN. The CCR at LAN is categorized into three types: bottom ash,

fly ash, and scrubber byproduct. Fly ash is collected by electrostatic precipitators and

pneumatically conveyed to an onsite fly ash silo, which is equipped with a baghouse for

dust control. The fly ash is then either transported off-site for beneficial reuse, landfilled

(in the case of high loss on ignition), or sluiced to LAN Upper Ash Pond (typically during

startup and shutdown). Bottom ash is sluiced to a surface impoundment identified as

the LAN Upper Ash Pond, Figure 2, where it is dredged, dewatered, and transported to

the onsite landfill. The LAN Upper Ash Pond is located south of the generating plant

and is the only existing CCR surface impoundment. Scrubber byproduct consists of fly

ash, unreacted lime, and activated carbon. Scrubber byproduct is collected in the

byproduct silo prior to being landfilled.

A previous CCR surface impoundment at LAN, identified as the Lower Ash Pond, was

located west of the generating plant and north of Power Plant Drive. The Lower Ash

Pond was closed in September 2015 by removing the CCR from the surface impoundment

via hydraulic dredge and sluicing the CCR to the south end of the LAN Upper Ash Pond.

CCR was removed from the Lower Ash Pond prior to backfilling the surface

impoundment.

General Facility Information:

Date of Initial Facility Operations: 19

1946

NPDES Permit Number:

IA0300100

Interstate Power and Light Company - Lansing Generating Station

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2

Latitude / Longitude: 41°56'38.43"N 91°38'22.39"W

Nameplate Ratings: Unit 1 (1948): 16.6 MW (Retired)

Unit 2 (1949): 11.4 MW (Retired)

Unit 3 (1957): 35.8 MW (Retired)

Unit 4 (1977): 270 MW

#### 2.1 LAN Upper Ash Pond

The LAN Upper Ash Pond is located southwest of the generating plant and south of Power Plant Drive. The LAN Upper Ash Pond receives influent flows from the Unit 4 boiler floor sumps, water treatment sumps, fly ash hydroveyor system, storm water runoff from the active dry ash landfill and hillside east of the impoundment, as well as sluiced fly ash and bottom ash. The LAN Upper Ash Pond is the only receiver of sluiced CCR at LAN. The CCR is sluiced from the generating plant to the south east corner of the LAN Upper Ash Pond, Figure 2. The sluiced CCR discharges into the southeast corner of the LAN Upper Ash Pond where the majority of the CCR settles. Ongoing maintenance dredging is conducted in the southern portion of the LAN Upper Ash Pond. The dredged CCR is temporarily stockpiled and dewatered prior to being transported to the on-site active dry ash landfill located south of the LAN Upper Ash Pond.

The sluiced water that is discharged into the LAN Upper Ash Pond flows to the west prior to flowing north through a series of five interconnected settling ponds separated by intermediate dikes. The intermediate dikes have 30-inch diameter corrugated metal pipes on the west and east sides, which hydraulically connect the five settling ponds. The water from each settling pond flows north until it enters the large open settling area of the LAN Upper Ash Pond.

Currently construction is ongoing, and in the Fall of 2021, a new concrete outlet Weir Box structure will be commissioned, while the previous discharge structure (Weir Box #1) will be retrofitted to become and emergency stormwater overflow structure for sizeable precipitation events. The new outfall structure will be in the northeast corner of the impoundment and equipped with fiberglass stoplogs to adjust the operating elevation of the LAN Upper Ash Pond. Discharge will be directed north in a 16-inch HDPE pipe

below Power Plant Drive. There it will transition to a 20-inch HDPE pipe and continue below the railroad tracks and then head east where National Pollution Discharge Elimination System (NPDES) Outfall 010 discharges into the Mississippi River.

Emergency Overflow Weir Box #1 located at north end of the LAN Upper Ash Pond, overflows a concrete weir into Weir Box #1, and then through a 24-inch diameter corrugated metal pipe under Power Plant Drive and into Weir Box #2. The water leaves Weir box 2 through a 24-inch diameter high density polyethylene pipe, which connects Weir Box #2 to Weir Box #3 in the backfilled former LAN Lower Ash Pond. The water flows through Weir Box #3 and discharges to the west through a 24-inch diameter corrugated metal pipe into Unnamed Creek #1. Unnamed Creek #1 flows to the north into Unnamed Creek #2 which then discharges into the Mississippi River.

The total surface area of the LAN Upper Ash Pond is approximately 11.5 acres and has an embankment height of approximately 20 feet from the crest to the toe of the downstream slope at its greatest height. The area of the entire CCR Unit inclusive of the impoundment and the dredging and dewatering areas is approximately 17 acres. The interior storage depth of the LAN Upper Ash Pond is approximately 28 feet. As stated in the 2020 Annual Inspection, the volume of impounded CCR and water within the LAN Upper Ash Pond is approximately 563,500 cubic yards.



## 3 STRUCTURAL STABILITY ASSESSMENT- §257.73(d)

This Report documents whether the design, construction, operation, and maintenance of each CCR unit is consistent with recognized and generally accepted good engineering practices for maximum volume of CCR and CCR wastewater which can be impounded.

#### 3.1 LAN Upper Ash Pond

The LAN Upper Ash Pond was constructed in 1974 in a valley directly south of the LAN generating station. The construction took place within the valley with the east and south side of the Upper Ash Pond being constructed against naturally occurring ground surface. The north and west sides of the impoundment were constructed of dredge spoil medium to fine sand from Mississippi River maintenance dredging.

To allow construction of the impoundment, the Unnamed Creek #1 was rerouted to run along the west side of the valley between the impoundment and a County Road on the east side slope of the valley, Figure 1. Soil investigations completed at the time of construction indicate the valley is underlain by a medium dense deposit of sand and gravel over the full valley floor with loose to very loose river silt laying on top of the sand and gravel at the north end of the planned Upper Ash Pond. Only organic top soil was removed prior to constructing the two embankment sides of the LAN Upper Ash Pond and the river silt remains in the foundation at the northern end of the LAN Upper Ash Pond. The details of the LAN Upper Ash Pond construction are shown in drawings prepared by Sargent & Lundy in 1974, Appendix A.

The embankment on the north side of the LAN Upper Ash Pond has a 36 foot wide crest to accommodate the Power Plant Drive access road. The western embankment has a 15-foot-wide crest. Both embankments were constructed with a 3 horizontal to 1 vertical outside slope. The inside slope of the embankment was lined with a layer of dry bentonite to reduce seepage loss through the permeable embankment soil.



The LAN Upper Ash Pond was constructed with a four foot square concrete riser well, Weir Box #1 for the control of process water and surface water discharge from the Pond. The concrete box is equipped with a wooden stop log system that is used to control the water elevation in the LAN Upper Ash Pond. The normal operation elevation of the stop logs is 648 which maintains the pond water surface at elevation 648.75 feet during normal plant flows of 3,500 gpm. The crest elevation of the embankments is a minimum of elevation 654.

In 2015, a subsurface soil investigation was undertaken to collect soil samples and determine the in-situ density of the north and west embankments and the underlying foundation soil. The soil borings were undertaken with hollow stem augers and sampling was completed with a standard split spoon (ASTM D1556), Figure 2. The density information along with soil test results for water content, grain size, and Atterberg limits, Appendix B, indicate the current conditions of the embankments as constructed in 1974.

In the summer of 2015, the west embankment of the LAN Upper Ash Pond was improved by the installation of a cement-bentonite cutoff wall along the center line of the embankment. The cutoff wall reduced seepage loss through the embankment and eliminated the saturation of the embankment toe and flow of surface water from the toe to the Unnamed Creek #1, Figure 2.

Also in the summer of 2015, the north embankment of the LAN Upper Ash Pond was improved by backfilling the Lower Ash Pond, substantially reducing the total height of the north embankment and improving its overall stability by surcharging the river silt layer in the foundation of the embankment.

#### 3.1.1 CCR Unit Foundation and Abutments - §257.73(d)(1)(i)

The LAN Upper Ash Pond was constructed on foundation soils that are medium dense sand and gravel in the southern part of the Pond and are suitable foundation soils. In the northern end of the pond the sand and gravels have an overlying river silt deposit that is

loose to very loose and is saturated due to the Mississippi River. The original construction of the LAN Upper Ash Pond was completed over the top of the river silt which has no clay like properties, Appendix B, and supported the embankment without substantial settlement after construction.

During assessment of embankment stability in 2015, it was determined that the river silt in the foundation resulted in slope stability safety factors less than the CCR Rule standards. As a result of the 2015 finding, the stability was improved within the northern embankment by closing and filling the lower ash pond in order to surcharge the river silt, lessen the northern embankment height, and by stabilizing ground water elevation.

The improvements increased the safety factor for slope stability controlled by the river silt layer to acceptable values as reported in the Safety Factor Assessment Report 40 CFR §257.73 (b) and (e). The effects of the weak foundation soil is corrected and the operation of the LAN Upper Ash Pond is acceptable as designed and modified.

#### 3.1.2 Slope Protection - §257.73(d)(1)(ii)

The impoundment is incised on the east and south sides. The north embankment crest is about 35 feet wide and contains Power Pant Road, which is the plant access road to the LAN. The northern slope is 3:1 and is comprised of shallow rooting vegetation, which is adequate to protect against surface erosion. The west embankment is also 3:1 and is vegetated with shallow rooting grasses, which is adequate to protect against surface erosion. The toe of the downstream west embankment has 10 feet of rip rap material, which protects from erosive forces during flooding of the Unnamed Creek #1. Lastly, backwater elevation from Mississippi River 100 year return elevation is 634, which does not reach toe of the embankment.

Sudden drawdown is addressed in Section 3.1.7.

#### 3.1.3 CCR Embankment Density- §257.73(d)(1)(iii)

The embankments were constructed in 1974 using dredge sand from maintenance dredging of the Mississippi River. The sand is medium to fine grained and very uniform

<u>Interstate Power and Light Company – Lansing Generating Station</u> Structural Stability Assessment

Structural Stability Assessmen Revision 1 - August 10, 2021



throughout the embankments, Appendix B. The density is medium dense to dense indicating adequate compaction at the time of construction. Observation during installation of a cement-bentonite cutoff wall in 2015 in the west embankment, indicates further grain cementation in the formerly saturated areas of the embankment, likely due to calcium hydroxide from pond water.

The information from this assessment indicates the CCR unit has been designed, constructed, operated, and maintained with sufficient embankment density.

#### 3.1.4 **Vegetation Management - §257.73(d)(1)(iv)**

Historically vegetation management has been conducted on a periodic basis. At the time of the 2020 Annual Inspection, the areas upstream and downstream slopes of the west embankment were properly managed grass slopes. The facility plans to continue managing the grassy vegetation on the embankments at a height that facilitates effective inspections.

## 3.1.5 Spillway Management - §257.73(d)(1)(v)

Currently construction is ongoing, and in the Fall of 2021, a new concrete outlet Weir Box structure will be commissioned, while the previous discharge structure (Weir Box #1) will be retrofitted to become and emergency stormwater overflow structure for sizeable precipitation events. The new outfall structure will be in the northeast corner of the impoundment and equipped with fiberglass stoplogs to adjust the operating elevation of the LAN Upper Ash Pond. Discharge will be directed north in a 16-inch HDPE pipe below Power Plant Drive. There it will transition to a 20-inch HDPE pipe and continue below the railroad tracks and then head east where National Pollution Discharge Elimination System (NPDES) Outfall 010 discharges into the Mississippi River. The structures and piping are constructed of non-erodible material and designed to carry sustained flows.

The emergency stormwater overflow structure overflows a concrete weir into Weir Box #1, and then through a 24-inch diameter corrugated metal pipe under Power Plant Drive,



and into Weir Box #2. The water leaves Weir box 2 through a 24-inch diameter high density polyethylene pipe, which connects Weir Box #2 to Weir Box #3 in the backfilled former Lower Ash Pond. The water flows through Weir Box #3 and discharges to the west through a 24-inch diameter corrugated metal pipe into Unnamed Creek #1. Unnamed Creek #1 flows to the north into Unnamed Creek #2 which then discharges into the Mississippi River. The structures and piping are constructed of non-erodible material and designed to carry sustained flows.

All structures associated with the LAN Upper Ash Pond are checked for malfunction (e.g., blockages, deformations, etc.) during the weekly inspections by the facility personnel.

This impoundment currently has a hazard potential classification of "Significant," which in turn requires an evaluation of the impacts of a 1,000-year rainfall event. The Inflow Flood Control Plan – Revision 1, which is a separate document developed to comply with 40 CFR §257.82, shows that the precipitation from this event will drain through the culverts without overtopping the embankments of the impoundment. The freeboard at peak flow will be 2.48 feet.

#### 3.1.6 Hydraulic Structures - §257.73(d)(1)(vi)

The new concrete discharge structure from the LAN Upper Ash Pond is controlled by a four-foot-wide Weir Box, where the flow discharges through a single 16-inch HDPE pipe, which later increases to a 20-inch HDPE pipe. Because this pipe is new construction, it will not be inspected as it was inspected at several points during construction.

The emergency stormwater overflow structure piping was previously inspected with remote video camera. Due to the timing in construction, this inspection will occur when the discharge though the piping is minimized in order to produce the best inspection of the piping. This report will be revised once the video inspection is completed in the Fall of 2021.



#### 3.1.7 Sudden Drawdown - §257.73(d)(1)(vii)

The toe of the north embankment is above the 100-year flood elevation of Mississippi River Pool 9, Appendix C. The toe of the west embankment could be flooded by backwater in the Unnamed Creek #1. However, the creek overflows down a drop riffle structure that loses 15 feet of elevation under the bridge for Power Plant drive and is unlikely to have significant flood elevation profile on the west embankment toe.

Information on the CCR unit design, construction, operation, and maintenance indicate sudden drawdown conditions from an adjacent water body do not occur for the LAN Upper Ash Pond.



## 4 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

To meet the requirements of 40 CFR §257.73(d)(3), I Mark W. Loerop hereby certify that I am a licensed professional engineer in the State of Iowa and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in 40 CFR §257.73(b) and 40 CFR §257.73(d).



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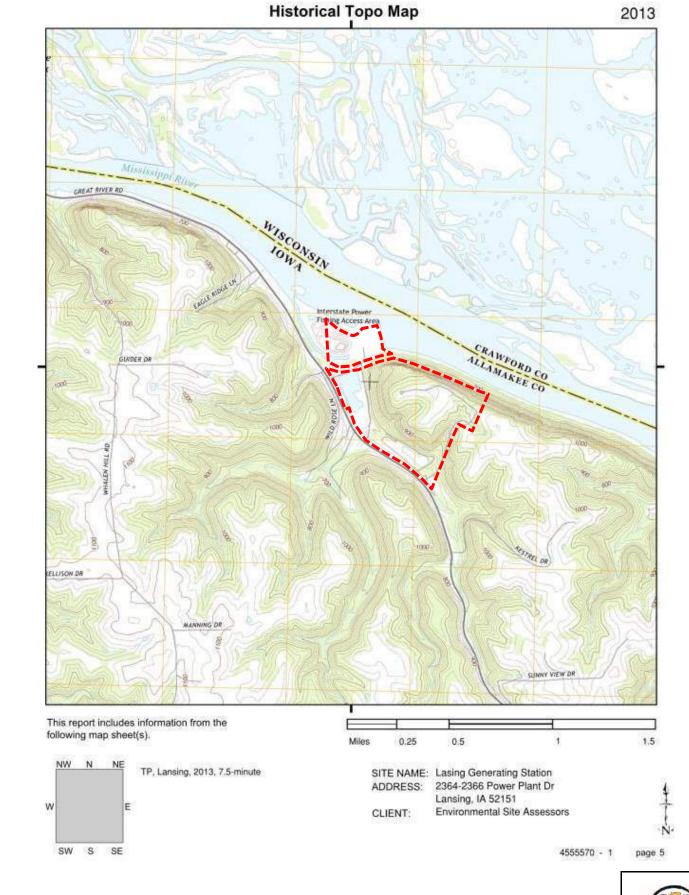
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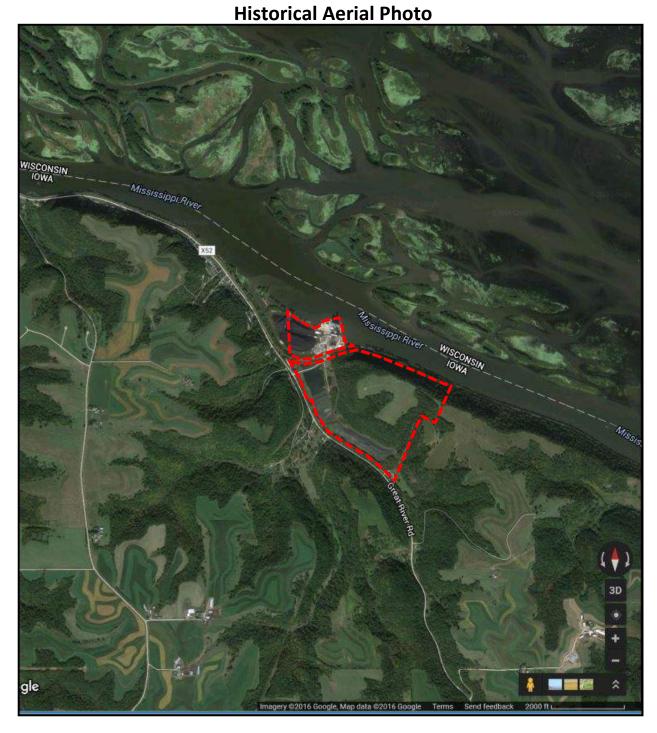
#### **FIGURES**

Alliant Energy Interstate Power and Light Company Lansing Generating Station Lansing, Iowa

Structural Stability Assessment







Approximate Property Boundary



6/7/2016

UPPER AND LOWER CCR POND TOPOGRAPHIC SURVEY AND LOWER CCR POND BATHYMETRY

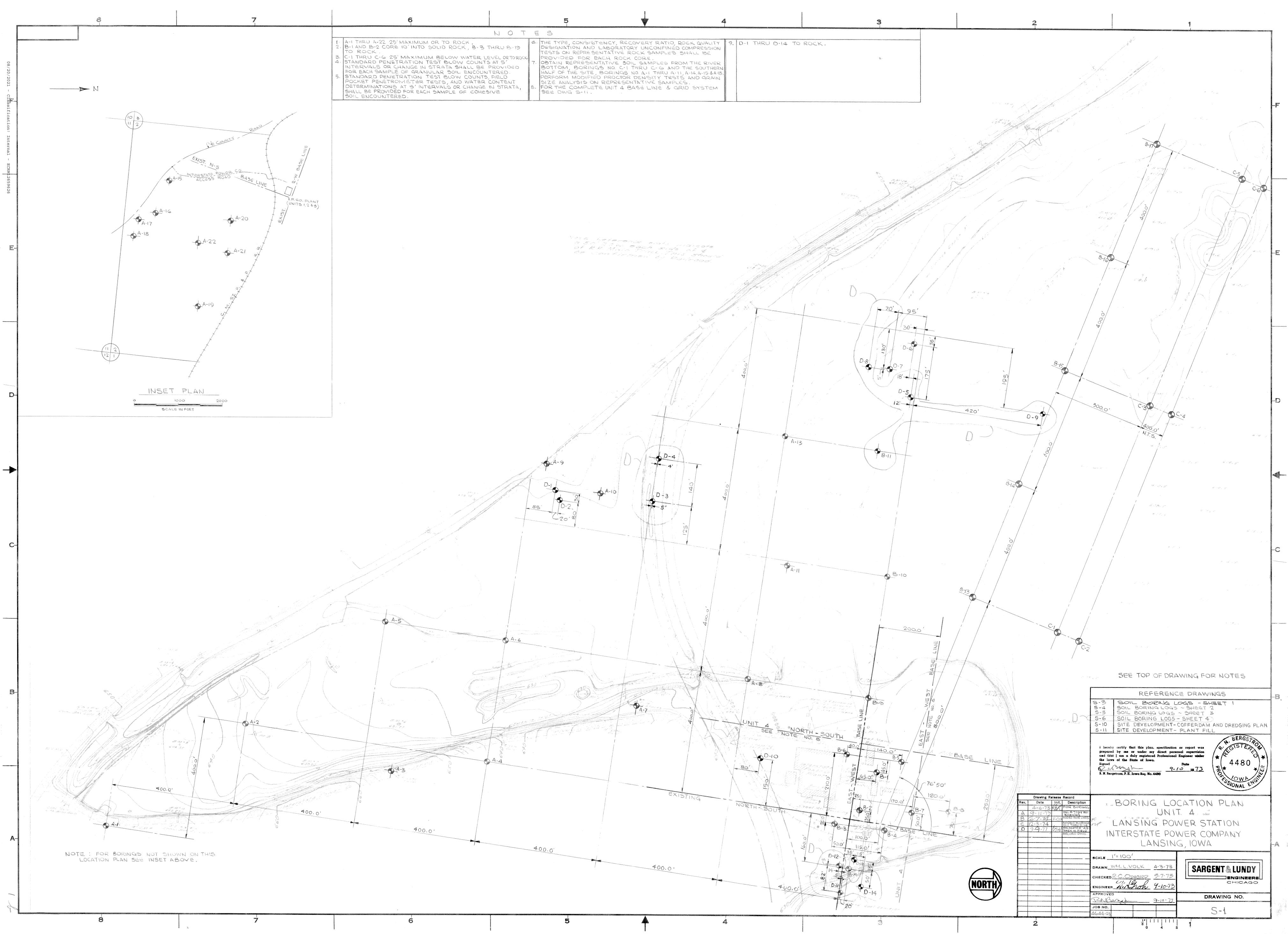
UPPER AND LOWER CCR POND TOPOGRAPHIC SURVEY AND LOWER CCR POND BATHYMETRY

### **APPENDIX A – 1974 Upper Ash Pond Construction Drawings**

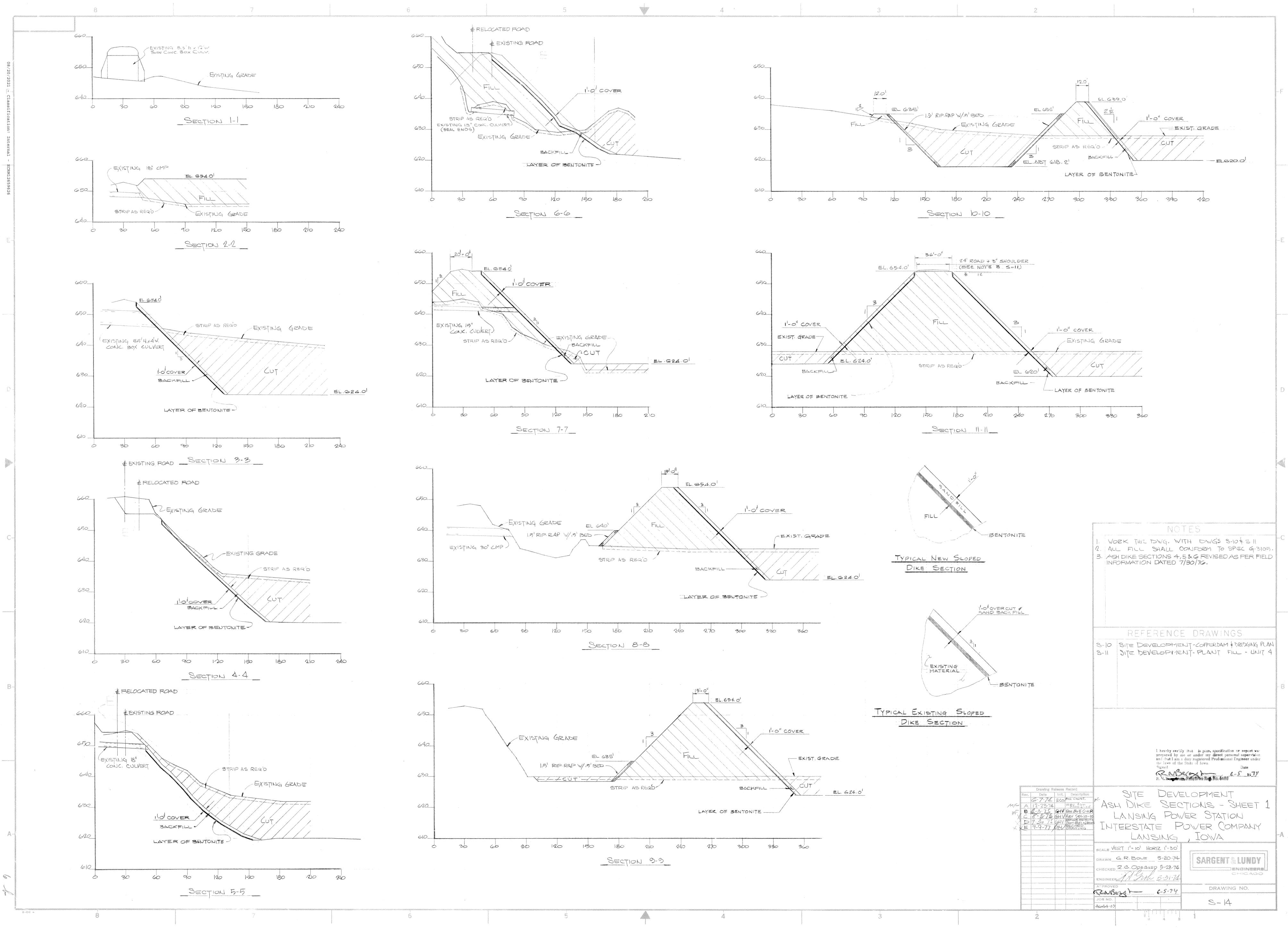
Alliant Energy Interstate Power and Light Company Lansing Generating Station Lansing, Iowa

Structural Stability Assessment









## APPENDIX B – 2015 Embankment and Foundation Soil Investigation

Alliant Energy Interstate Power and Light Company Lansing Generating Station Lansing, Iowa

Structural Stability Assessment





**CLIENT: Hard Hat** 

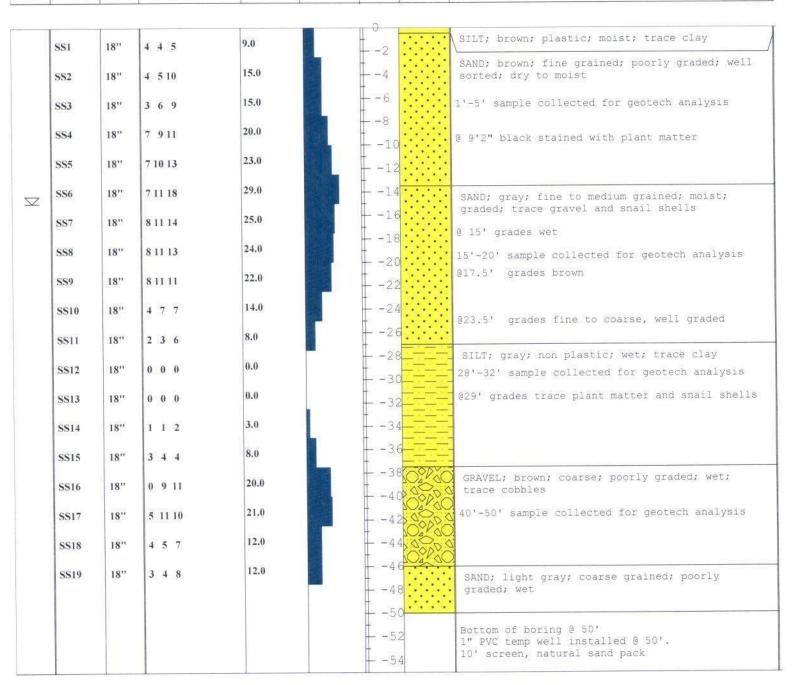
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page 1 of 1

#### PROJECT: Lansing, IA

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**CLIENT: Hard Hat** 

N NOT SURVEYED COORDINATES: E NOT SURVEYED

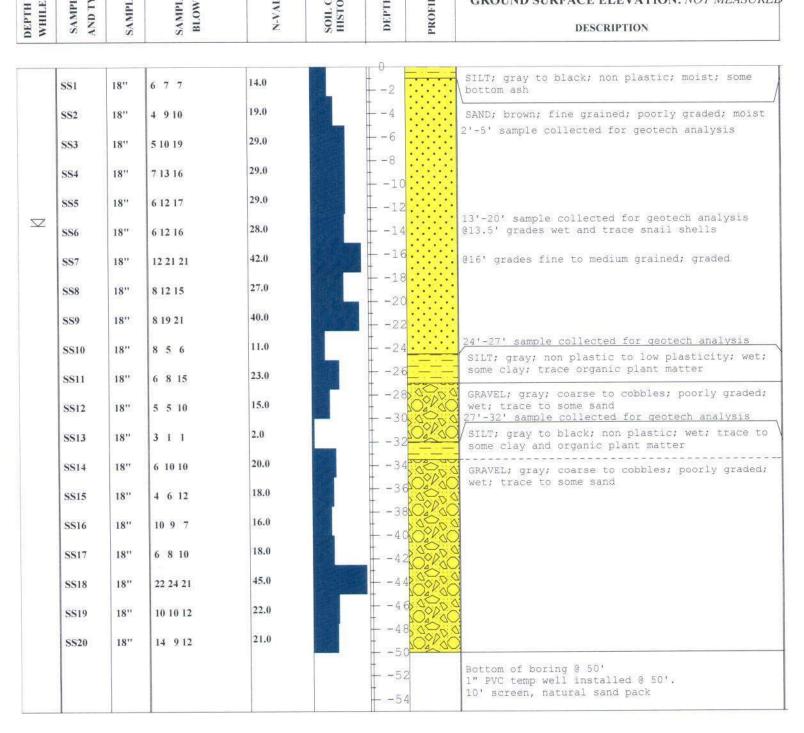
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#### PROJECT: Lansing, IA

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**CLIENT: Hard Hat** 

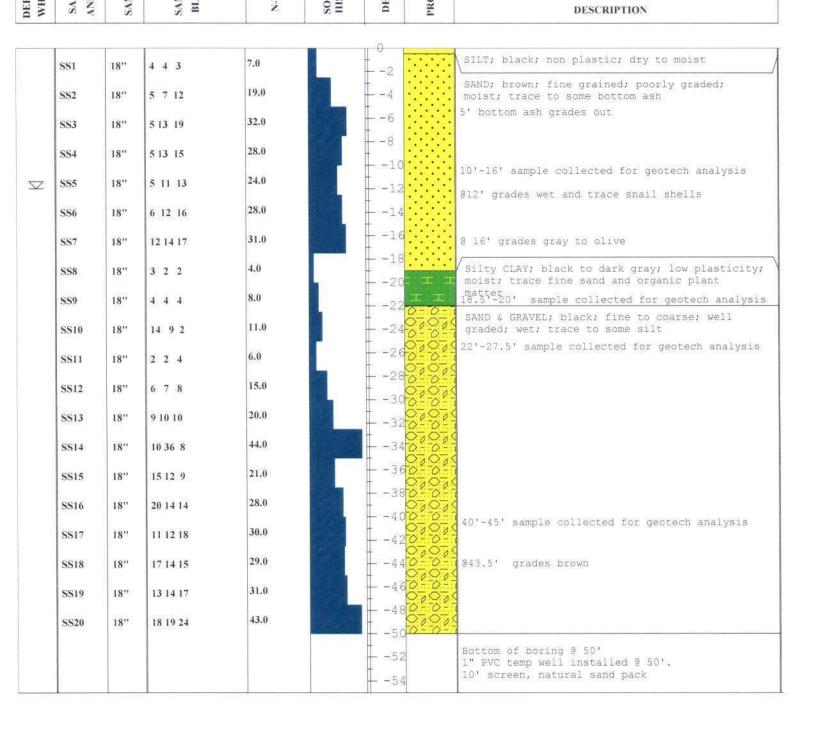
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page 1 of 1

#### PROJECT: Lansing, IA

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**CLIENT: Hard Hat** 

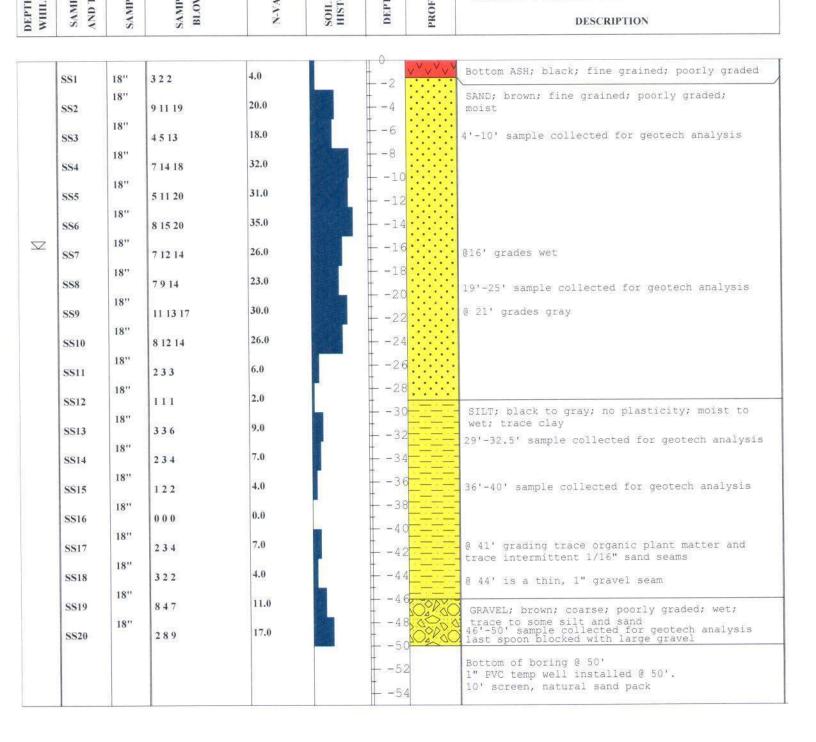
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page 1 of 1

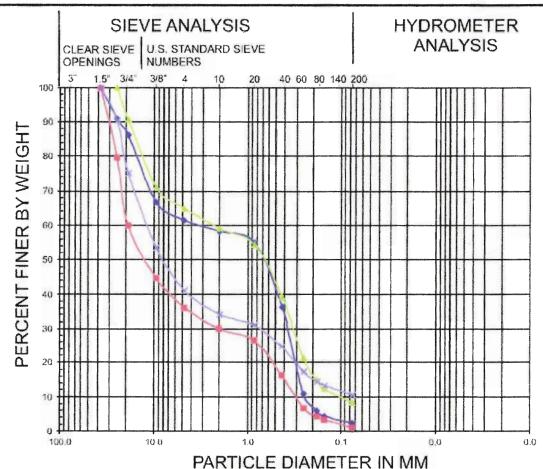
### PROJECT: Lansing, IA

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Distribution

Project IPL - Lansing Generating Station Tested By Test America Date 2/3/2015 SB-1, SB-3 & SB-5 "SAND & GRAVEL" Boring No.



COBBLES	GRA	WEL		SANI	)	CUTAND OLAV EDA OTION
CODDLEG	coarse	fine	coarse	medium	fine	SILT AND CLAY FRACTION

SYMBOL	BORING	DEPTH (FT.)	SOIL DESCRIPTION	U.S.C.S.	W %
×	SB-1	40 - 50	SAND & GRAVEL	SW/GW	16.5
)III.	SB-3	27 - 32	SAND & GRAVEL	SW/GW	13.4
1	SB-5	22 - 27.5	SAND & GRAVEL	SW/GW	32.1
X	SB-5	44 - 45	SAND & GRAVEL	SW/GW	9.8



**Particle Size** Distribution

2/3/2015 Tested By Test America Project IPL - Lansing Generating Station SB-1, SB-3 & SB-5 "SANDY SILT" Boring No. **HYDROMETER** SIEVE ANALYSIS **ANALYSIS** CLEAR SIEVE U.S. STANDARD SIEVE OPENINGS NUMBERS 40 60 80 140 200 100 BY WEIGHT FINER PERCENT

PARTICLE DIAMETER IN MM

COBBLES	GRA	VEL	SAND			CHIT AND CLAVEDACTION	
COBBLES	coarse	fine	coarse	medium	fine	SILT AND CLAY FRACTION	

SYMBOL	BORING	DEPTH (FT.)	SOIL DESCRIPTION	U.S.C.S.	L.L.	P.L.	W %
M	SB-1	28 - 32	Sandy Silt	ML	28	26	36.1
	SB-3	24.5 - 27	Sandy Silt	ML	27	23	25.4
A	SB-5	18.5 - 20	Sandy Silt	ML	24	20	21.8

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⚠ 6-15-15 TJH MWL INCORPORATE IPL COMMENTS REV DATE BY APP DESCRIPTION

SCALE: DRAWN BY: JFD

NONE

Engineering, Construction and Management Solutions

DATE: 5-14-15

INTERSTATE POWER AND LIGHT (IPL) LANSING GENERATING STATION PROJECT 2320 POWER PLANT DR LANSING, IA 52151

CLIENT / LOCATION

SEEPAGE CONTROL CUT-OFF WALL PARTICLE SIZE DISTRIBUTION SB-1 & SB-3

DRAWING DESCRIPTION

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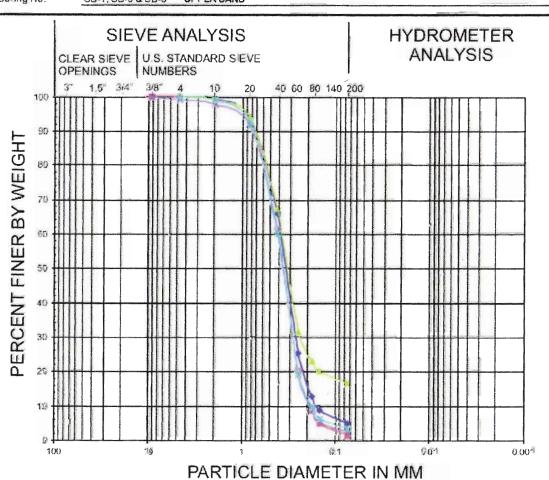
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# Particle Size Distribution

Project IPL Lansing Generating Station Tested By Test America Date 2/3/2015
Boring No. SB-1, SB-3 & SB-5 "UPPER SAND"

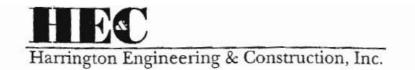


COBBLES	GRAVEL			SAND		OUT AND GUN PERCEION
SOBBLES	coarse	fine	coarse	medium	fine	SILT AND CLAY FRACTION

SYMBOL	BORING	DEPTH (FT.)	SOIL DESCRIPTION	U.s.c.s.	WW %
*	SB-1	1-5	Medium - Fine Sand	SP	4.1
直	SB-1	15 - 20	Medium - Firth Sand	SP	29.1
A	SB-3	2-5	Sitty Wedium - Fine Sand	SAA	3.1
X	SB-3	13 - 20	Medium - Fine Sand	SP	190
*	SB-5	10 - 16	Medium - Fire Sand	SP	13.3

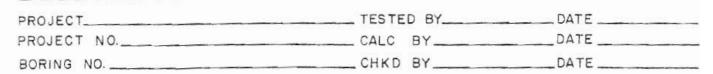
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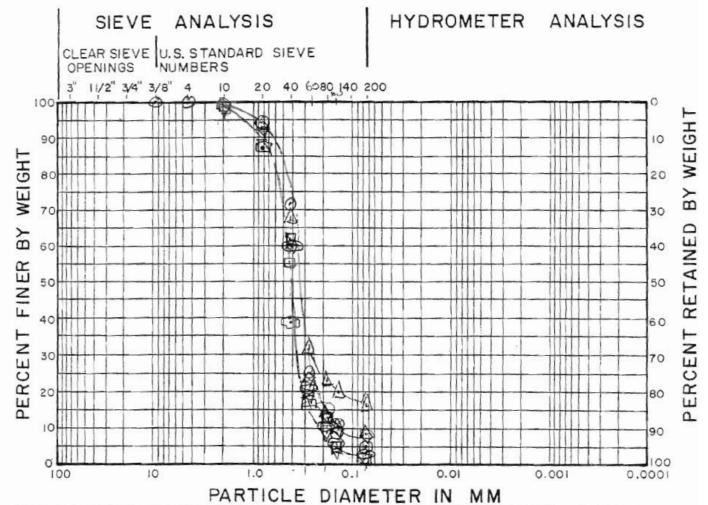
APPENDIX B UPDATE TO ADD SB-T GEPARATE S/2×11



## Particle Size Distribution

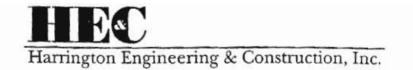
# " UPPER SAND"





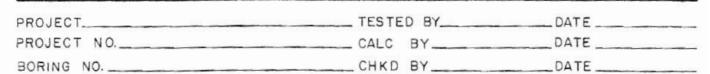
# COBBLES GRAVEL SAND SILT AND CLAY FRACTION

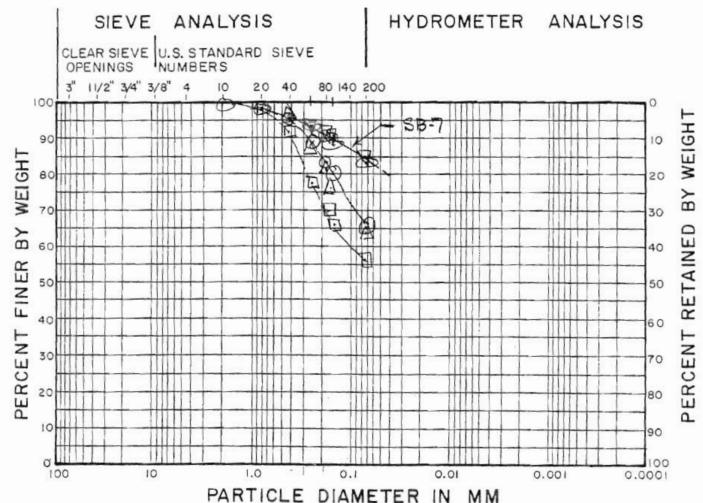
SYMBOL	BORING SAM	PLE DEPTH	SOIL DESCRIPTION	U.S.C.S. L.L	. PL W%
0	58-1	1-5	MEN-FINE SAID	SP	14.1
C)	SB-1	15-20	11	SP	201
A	58-3	2-5	SILTY MED-FIVE SAUD	SM	3.1
V	3B-3	13-20	MEW - FINE SAULA	48	19.0
0	SB-5	10-16	1,	SP	13.3
0	SB-7	4-10	1,	<b>S</b> PSM	3,1
•	98-7	9.25	1.	SP	17.1



## Particle Size Distribution

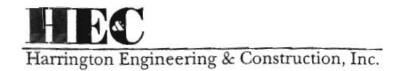
11		1	ŧ
* *	YOUAR	SILT	





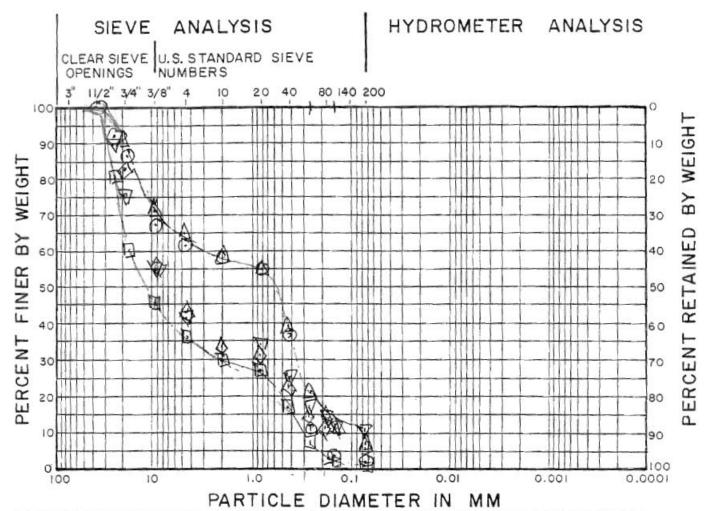
# COBBLES GRAVEL SAND SILT AND CLAY FRACTION

O SE	3-1	28-32	SOIL DESCRIPTION				
	0.000 (0.000)		SMDY STLT	IML	28	26	36,1
D 58	3-3	24.5-27	SANDY STUT	ML	27	23	25.4
△ SB.	-5	18.5-20	SWDY SELF	ML	24	20	21.8
V SB	7	29-32.5	SOULY STUT	ML	29	25	27.0
O 58	37	36-40	SAUDY STIT	ML	31	26	35.7



## Particle Size Distribution

SANDY GRAVEC						
PROJECT	TESTED BY	DATE	_			
PROJECT NO	CALC BY	DATE	_			
BOBING NO	CHKD BY	DATE				



0000150	GRA	VEL		SAND		CUT AND CLAY FOACTION
COBBLES	coarse	fine	coarse	medium	fine	SILT AND CLAY FRACTION

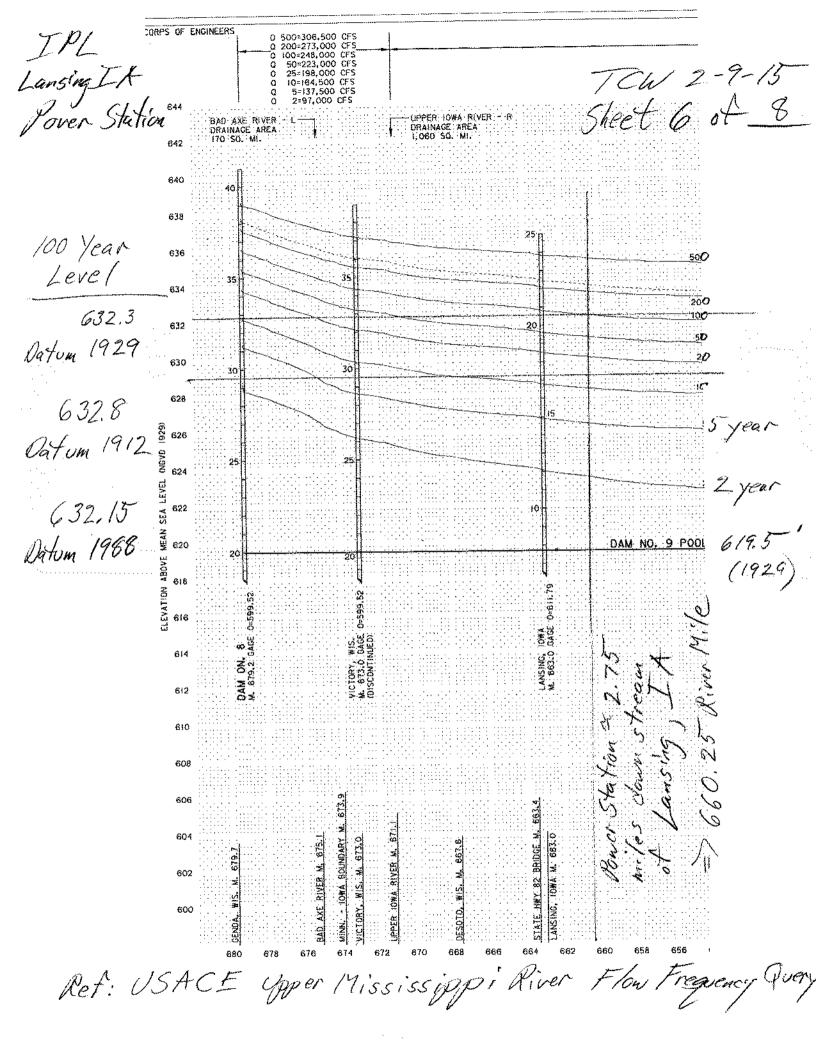
SYMBOL	BORING SAMP	LE DEPTH	SOIL DESCRIPTION	U.S.C.S. L.L.	P.L. W%
0	58-1	40-50	SAND I GRAVEL	3W/64/	16.5
[L]	58-3	27-32	11	- 14	13.4
1	58-5	22-27,5	(,	4	32.1
V	SB-5	44-45	1,	1,	9.8
0	SB-7	46-50	11	"1	35.7

## APPENDIX C - Flood Elevations for Mississippi River Pool #9

Alliant Energy Interstate Power and Light Company Lansing Generating Station Lansing, Iowa

Structural Stability Assessment





### **APPENDIX D – Construction Details Weir Box #1**

Alliant Energy Interstate Power and Light Company Lansing Generating Station Lansing, Iowa

Structural Stability Assessment



