ALLIANT ENERGY Interstate Power and Light Company Lansing Generating Station

CCR SURFACE IMPOUNDMENT

STRUCTURAL STABILITY ASSESSMENT

Report Issued: October 18, 2017

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 and effective October 19, 2015.

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. This Report is 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:

1946

NPDES Permit Number:

IA0300100

<u>Interstate Power and Light Company – Lansing Generating Station</u> Structural Stability Assessment 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 (CMPs) 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. The north end of the LAN Upper Ash Pond has a concrete wet well and overflow weir structure that controls the LAN Upper Ash Ponds water level, and is identified as Weir Box #1. The water in the LAN Upper Ash Pond overflows a stop log weir into Weir Box #1, and then through a 146 foot long 24 inch diameter CMP under Power Plant Drive, and into Weir Box #2. The water leaves Weir box 2 through a 225 foot long 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 77 foot long 24-inch diameter CMP into Unnamed Creek #1. Unnamed Creek #1 flows to the north into Unnamed Creek #2 which then discharges into the Mississippi River. The National Pollutant Discharge Elimination System (NPDES) Outfall 002 monitoring location, which consists of flow monitoring instrumentation, is located at Weir Box #1 and compliance samples are collected from Weir Box #3.

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. The volume of impounded CCR and water within the LAN Upper Ash Pond is approximately 587,000 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 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 initial Annual Inspection in October 2015, the areas upstream and downstream slopes of the west embankment could not be properly inspected due to the presence of dense/tall brush and woody vegetation along the entire slope. Since the Annual Inspection, the facility has removed woody deep rooting vegetation from the embankment and has managed the remaining grassy vegetation to facilitate effective inspections. 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)

The water in the LAN Upper Ash Pond overflows a stop log weir into Weir Box #1, and then through a 146 foot long 24 inch diameter CMP under Power Plant Drive, and into Weir Box #2. The water leaves Weir box 2 through a 225 foot long 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 77 foot long 24-inch diameter CMP into Unnamed Creek #1. Unnamed Creek #1 flows to the north into Unnamed Creek #2 which then



discharges into the Mississippi River. The culverts are constructed of non-erodible material and designed to carry sustained flows.

The Weir Box structures are checked for malfunction (e.g., blockages, deformations) 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, 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 approximately 8 inches.

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

The discharge structure from the LAN Upper Ash Pond is controlled by a four foot wide weir box (Weir Box #1), where the flow discharges through a single 24-inch pipe. Prior to the final discharge there are two intermediate structures, Weir Box #2 and Weir Box #3, which were previously used to convey flow through the now closed lower ash pond. During closure of the lower ash pond, a 24-inch HDPE pipe was installed to connect Weir Box #2 to Weir Box #3. The pipes installed between Weir Box #1 to Weir Box #2 and from Weir Box #3 to the outfall are 24-inch CMPs.

On June 22, 2016 all three sections of pipes were inspected using remote camera video inspection system. The inspection showed that there was minimal deterioration, deformation, distortion, sedimentation, debris, and no bedding deficiencies were observed within the pipe from Weir Box #2 to Weir Box #3 and from Weir Box #3 to the outfall.

The pipe from Weir Box #1 could not be inspected because the pipe is lower in elevation than the subsequent downstream pipes. A pump was used to dewater Weir Box #1 and the video camera system was able to collect visuals on the initial section of pipe. The



camera observed solids buildup of 8-inches to 10-inches thick. The solids appeared to be organic in nature and could be due to biological growth within the pipe. Additionally, the solids were intermixed with a thin hard layers.

In September 2017, LAN successfully removed the solids that had accumulated within the 146 feet of 24-inch CMP between Weir Box #1 and Weir Box #2. The solids were removed by advancing pipe jetting equipment through the entirety of the 24-inch CMP from Weir Box #1 to Weir Box #2. In order to jet the pipe, the water level within the LAN Upper Ash Pond was lowered to reduce flow into Weir Box #1. During the pipe cleaning activities, the accumulated water within both Weir Box #1 and Weir Box #2 was managed by pumping the water out of the weir boxes and conveying it back into the LAN Upper Ash Pond. The solids that were removed from the pipe jetting activities were collected and pumped back into the LAN Upper Ash Pond for settling.

Following the pipe cleaning activities, the 24-inch CMP was inspected using a remote video camera, similar to the inspection completed in June 2016. The video inspection confirmed the successful removal of solids within the 24-inch CMP. The video inspection observed an approximate two-foot sag within the pipe. The sag in the pipe extended for nearly the entire length. Given the composition of the embankment materials and age of the pipe, this sag is believed to be a product of settling.

Although there are no significant signs of deterioration, deformation, distortion, bedding deficiencies, sedimentation, and debris which may negatively affect the operation of the hydraulic structure, HHS recommends that LAN monitors for any differences in the performance of the pipe from Weir Box #1 to Weir Box #2. Any significant changes to flows, increases in suspended solids, or observed sediment buildup discovered during subsequent 7-day or 30-day inspections may indicate a deficiency in the structure and would warrant additional investigation.



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 foot 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).

The initial Structural Stability Assessment, dated September 02, 2016, was prepared and certified by a qualified professional engineer. The next periodic review of this Structural Stability Assessment is required to be complete by September 2021.

This certification is for Revision 1 of the Structural Stability Assessment, which includes the following amendments:

• Revisions to the text in Section 3.1.6 Hydraulic Structures regarding the cleaning and inspection of the 24-inch diameter CMP between Weir Box #1 and Weir Box #2 that occurred in September 2017.



Name: MARK LOFROP

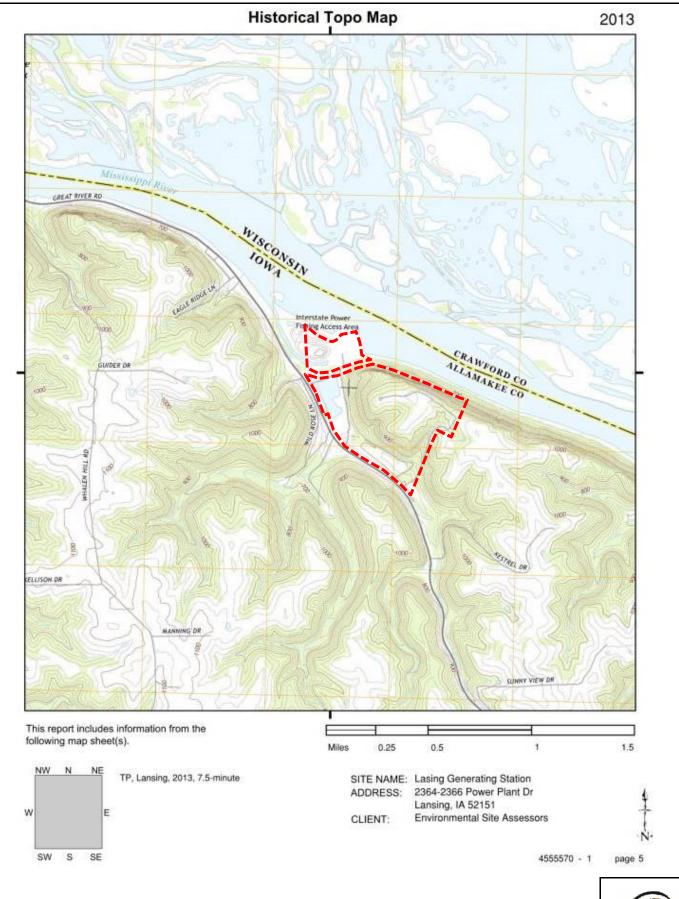
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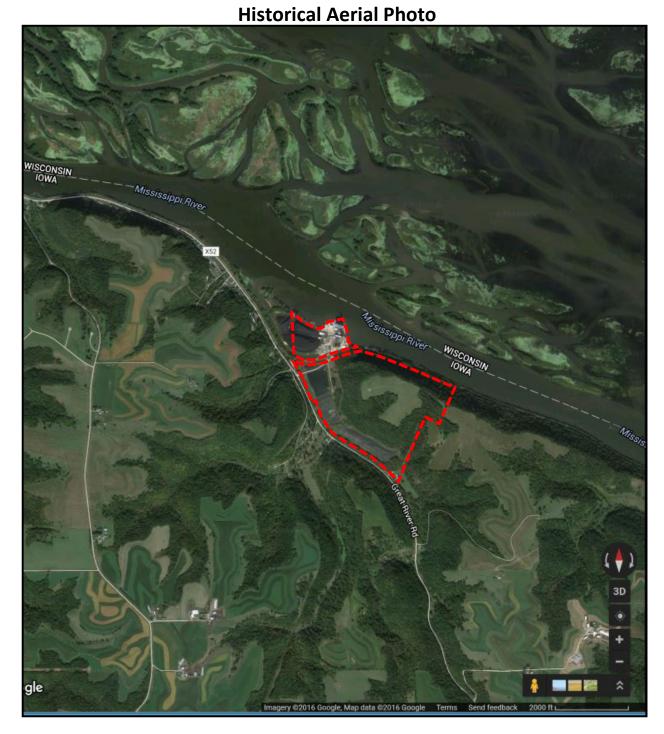
FIGURES

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

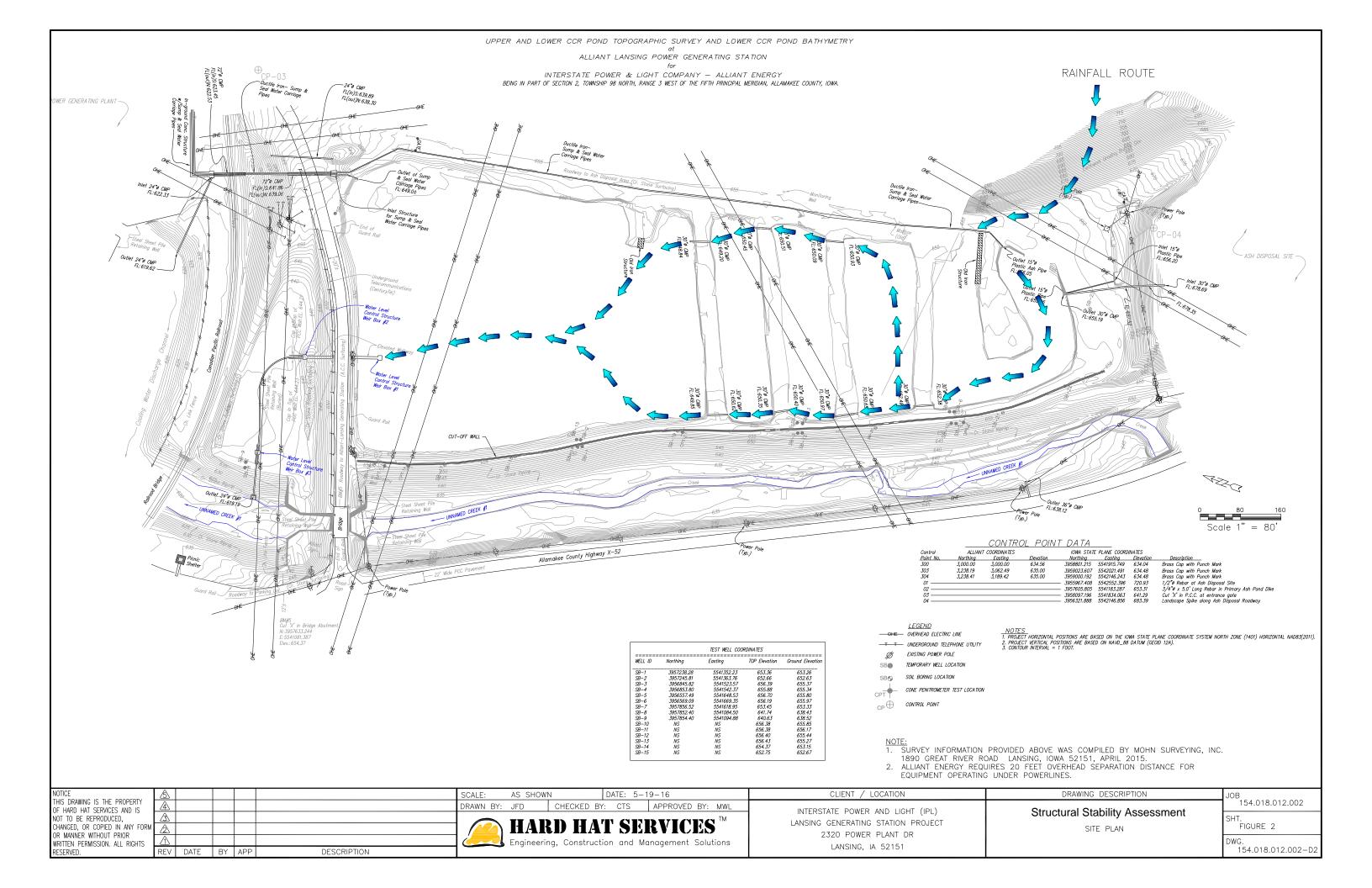
Structural Stability Assessment

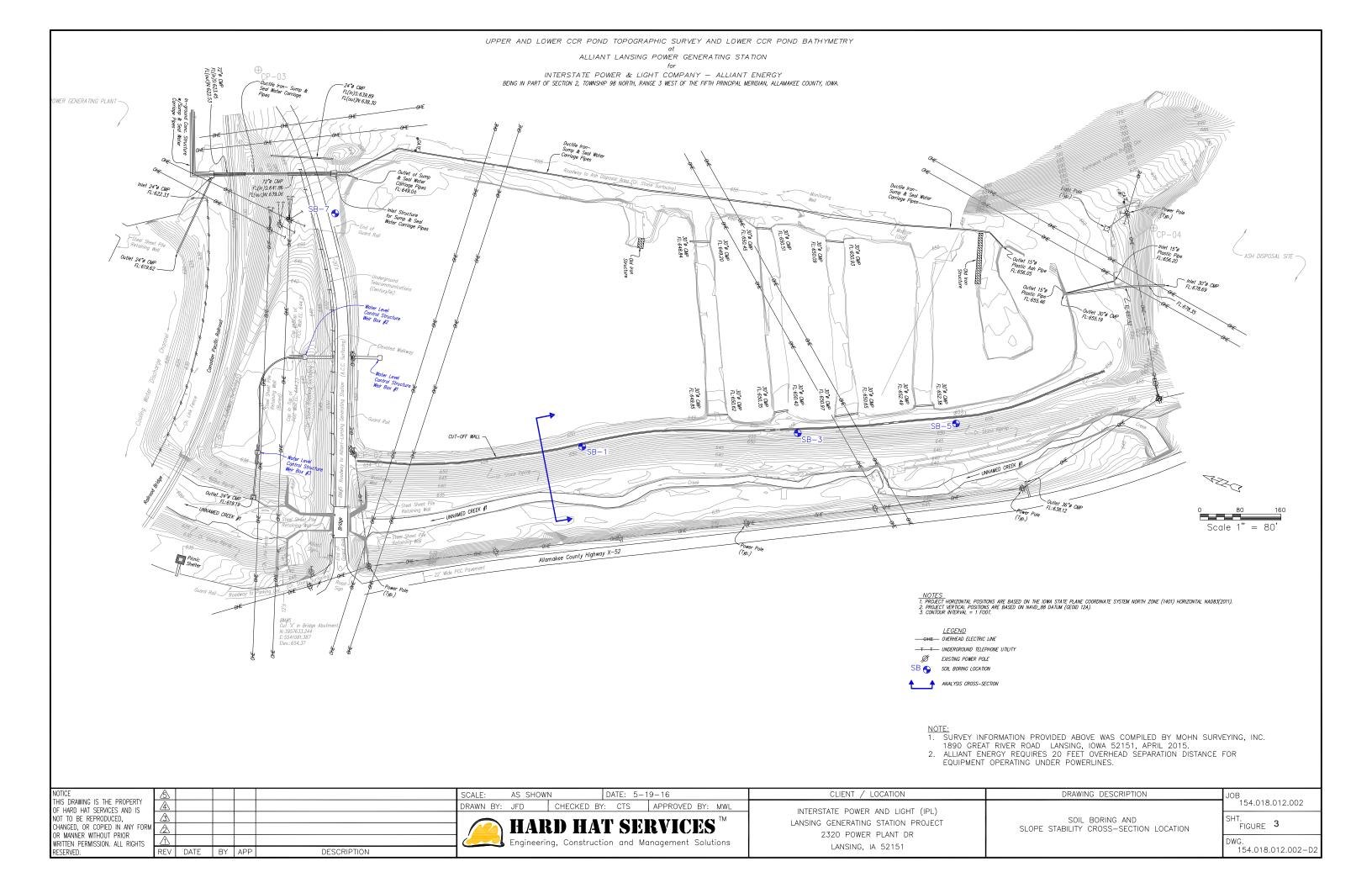






Approximate Property Boundary



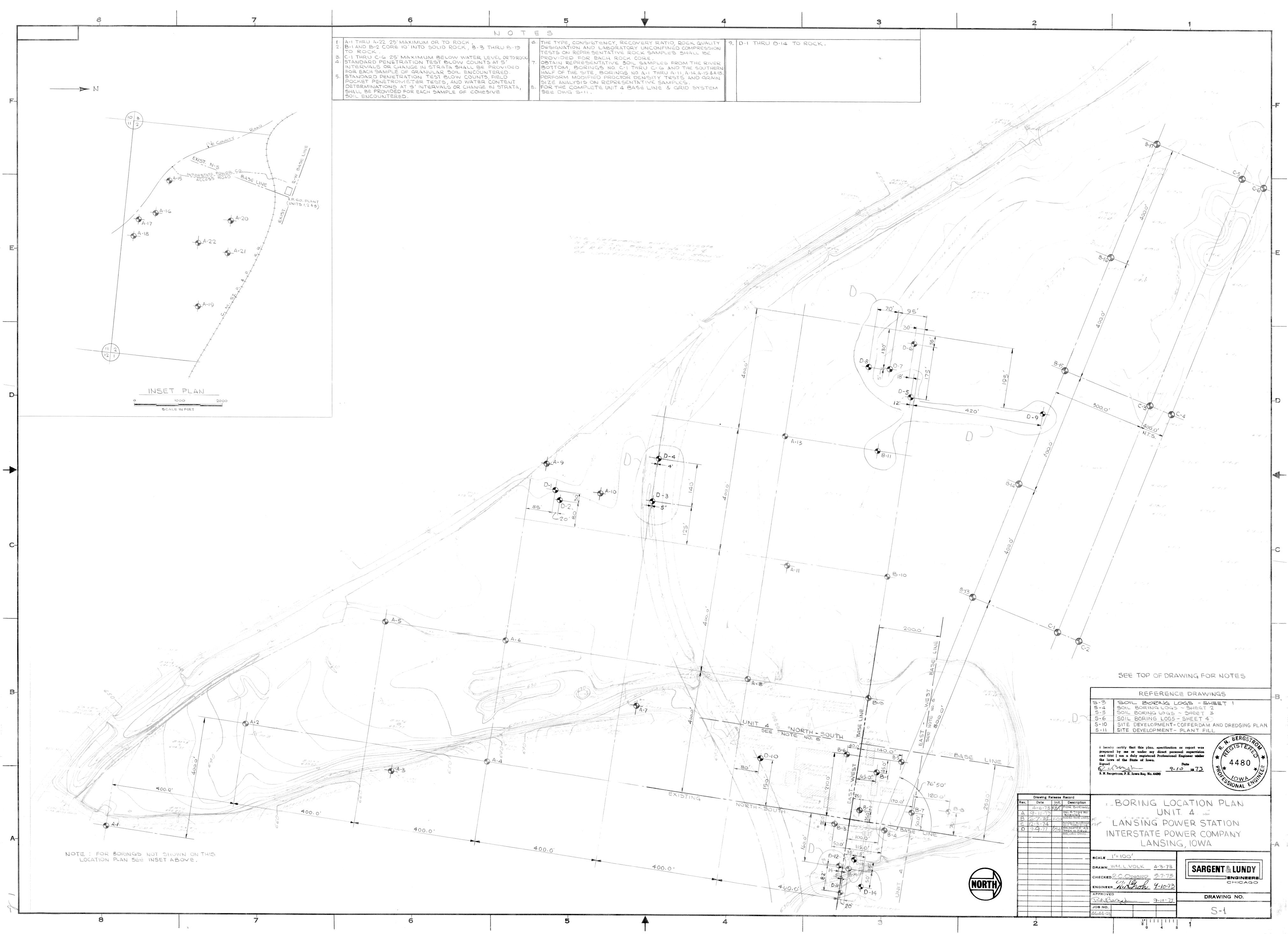


APPENDIX A – 1974 Upper Ash Pond Construction Drawings

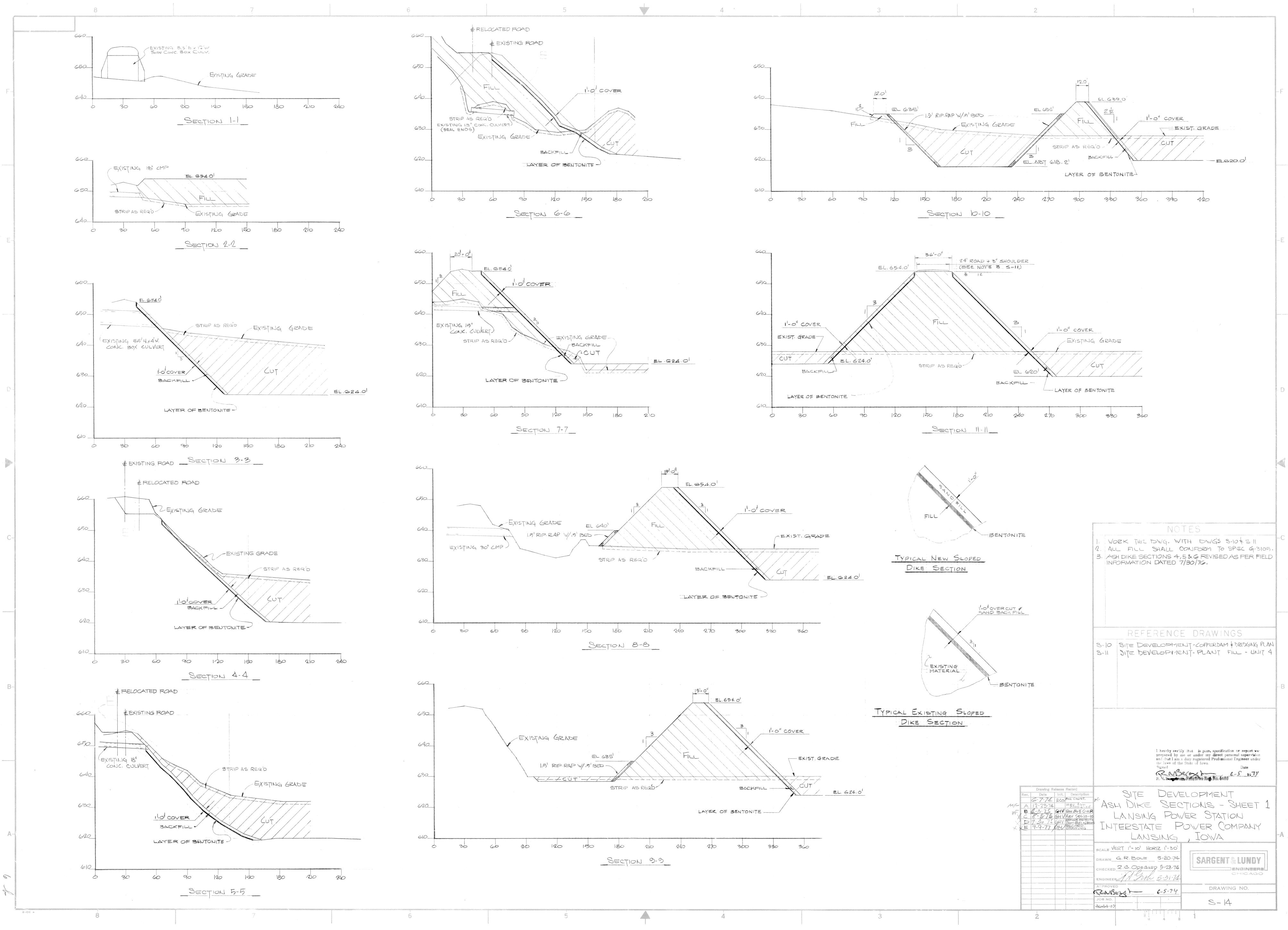
Alliant Energy Interstate Power and Light Company Lansing Generating Station Lansing, Iowa

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

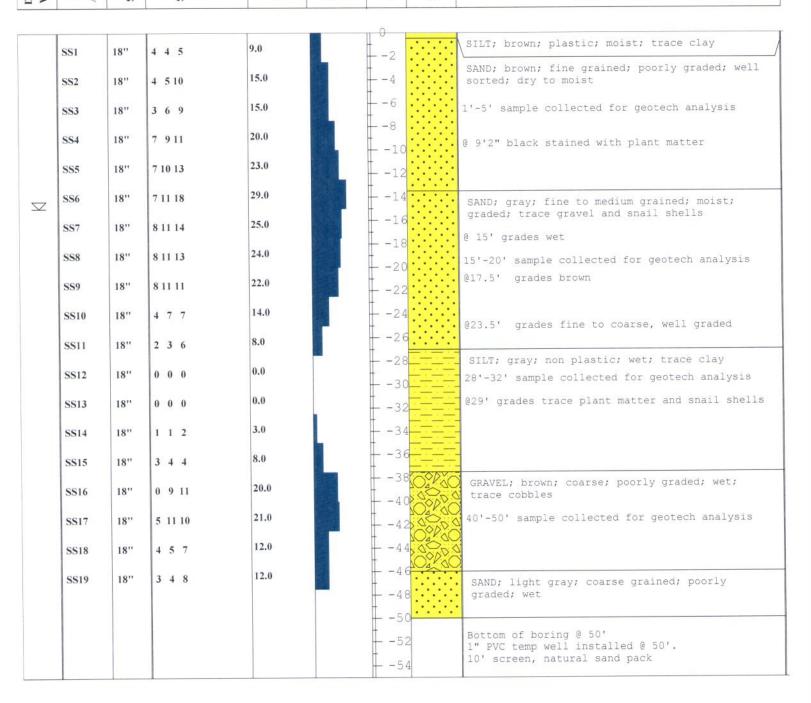
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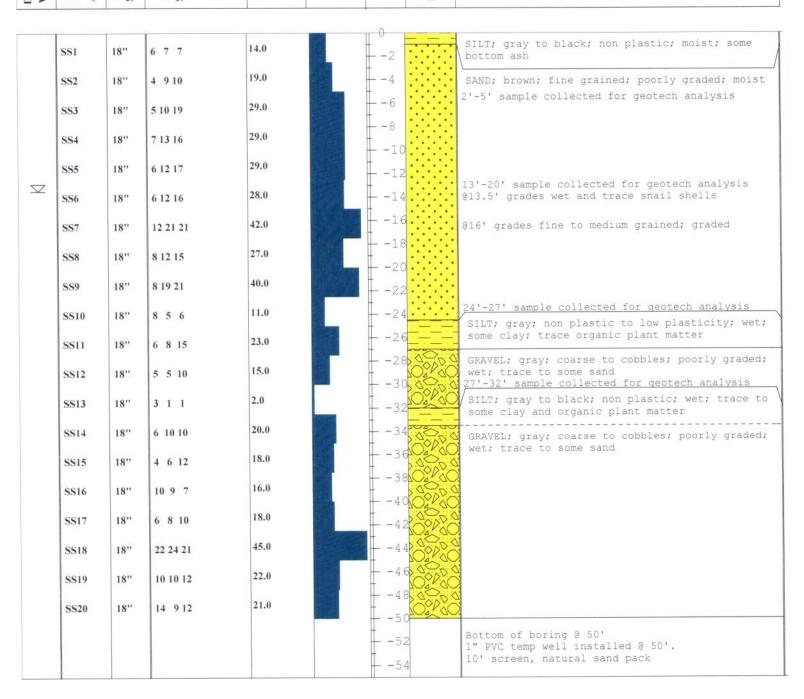
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CLIENT: Hard Hat

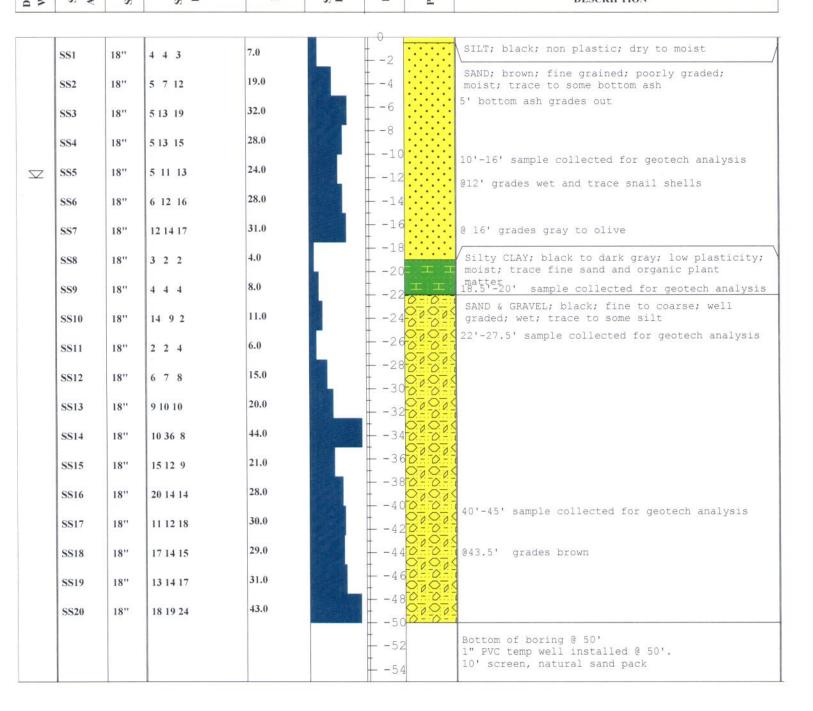
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PROJECT: Lansing, IA

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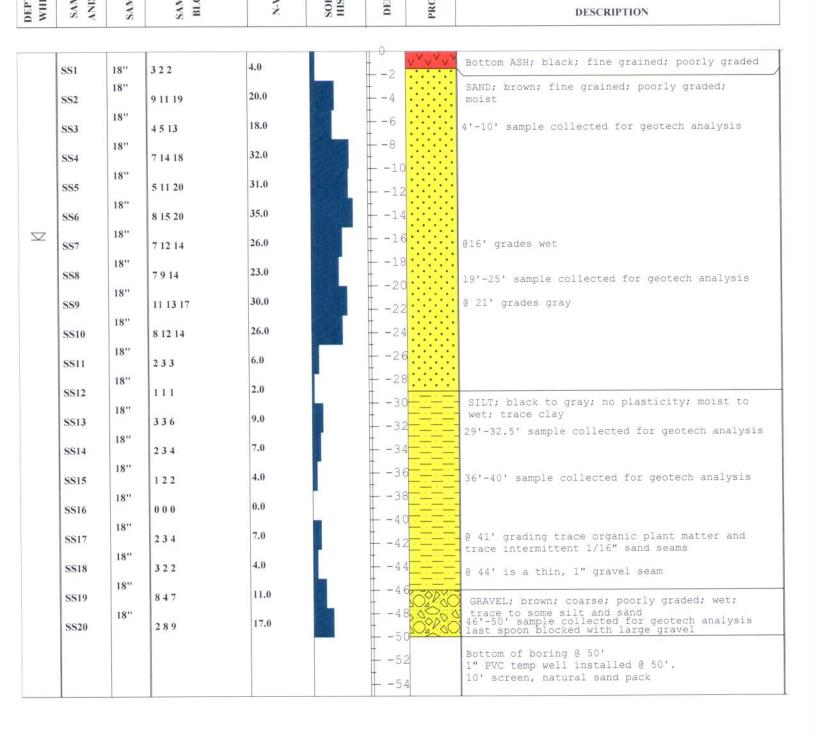
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PROJECT: Lansing, IA

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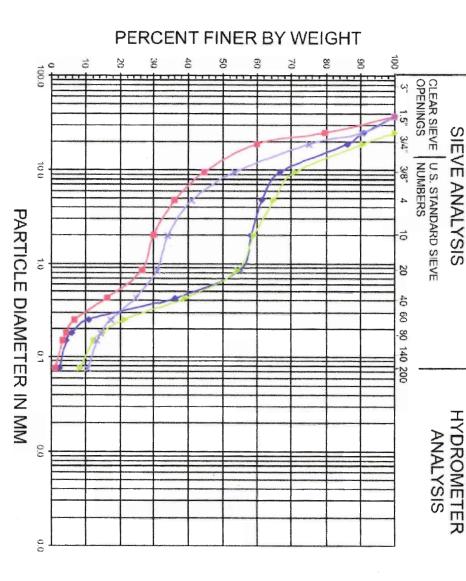
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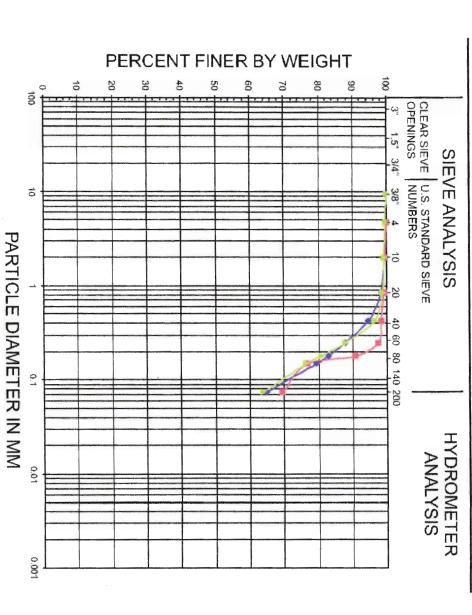
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SB-3

27 - 32 40-50 COBBLES

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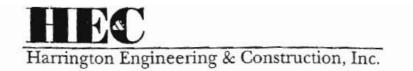
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HARD HAT SERVICES Engineering, Construction and Management Solutions	DRAWN BY: JFD CHECKED BY: TJH APPROVED BY: MWL	SCALE: NONE DATE: 5-14-15
LANSING GENERATING STATION PROJECT 2320 POWER PLANT DR LANSING, IA 52151	INTERSTATE POWER AND LIGHT (IPL)	CLIENT / LOCATION
PARTICLE SIZE DISTRIBUTION SB-5	SECONDE CONTROL CLIT-DEE WALL	DRAWING DESCRIPTION
SHT. 9 DWG. 154021SW-08-12	154.021.003	BOL

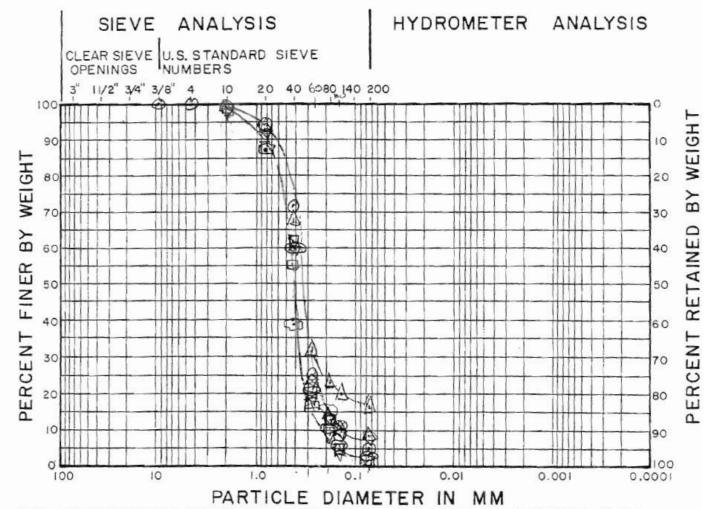
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Particle Size Distribution

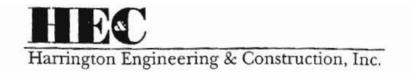
"				
	UPPER	SAN	15	

PROJECT	TESTED BY_	DATE
PROJECT NO	CALC BY	DATE
BORING NO	CHKD BY	DATE



COBBLES	GRAVEL			SAND		CUT AND OLAY FRACTION
CUBBLES	coarse	fine	coarse	medium	fine	SILT AND CLAY FRACTION

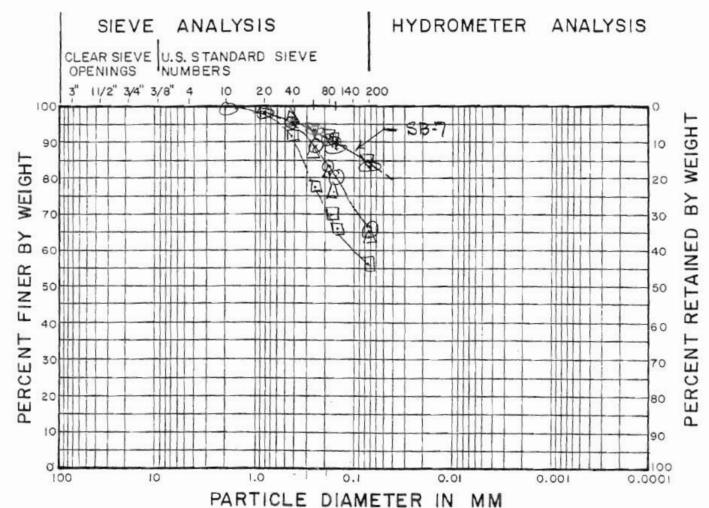
SYMBOL	BORING SAMPLE	DEPTH	SOIL DESCRIPTION	U.S.C.S. L.L.	PL W%
0	58-1	1-5	MED-FINE SULD	SP	14.1
- CI	SB-1	15-20	11	SP	201
\triangle	SE-3	2-5	SILTY MED-FOUE SAUD	SM	3.1
V	38-3	13-20	MEW - FOUE SAULA	48	19.0
0	SB-5	10-16	11	SP	13.3
0	SB-7	4-10	1,	S PSM	3.1
	98-7	R-25	1.	SP	17.1



Particle Size Distribution

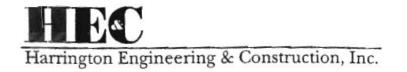
11		11
	YHUAR	STIT

PROJECT	TESTE) BY	DATE
PROJECT NO.	CALC	BY	DATE
BORING NO.	CHKD	BY	DATE



COBBLES GRAVEL SAND SILT AND CLAY FRACTION

		SAMPLE	DEPTH	SOIL DESCRIPTION	U.S.C.S.	L.L.	RL	W %
0	SB-1		28-32	SANDY STLT	ML	28	26	36,1
DIS	SB-3		24.5-27	SANDY STUT	ML	27	23	25.4
1 S	5B-5		18.5-20	SWDY SELF	ML	24	20	21.8
VIS	5B-7		29-32.5	SOULY STUT	ML	29	25	27.0
0 9	3B-7		36-40	SAUDY STIT	ML	31	26	35.7



Particle Size Distribution

11	GC 0 20	1	
	SWOY	GRAVEL	

PROJECT	TESTE	D BY	DATE
PROJECT NO	CALC	BY	DATE
BORING NO	CHKD	BY	DATE

SIEVE ANALYSIS HYDROMETER ANALYSIS CLEAR SIEVE U.S. STANDARD SIEVE OPENINGS NUMBERS 11/2" 3/4" 3/8" 20 40 80 140 200 100 PERCENT RETAINED BY WEIGHT 90 WEIGHT 20 30 PERCENT FINER BY 40 50 50 40 60 20 80 90 100 0.001 0.0001 10 100

PARTICLE DIAMETER IN MM

COBBLES	GRAVEL			SAND		CILT	AND CLAY FRACTION	FRACTION
	coarse	fine	coarse	medium	fine	SILI AND C	AND CLAT	AT FRACTION

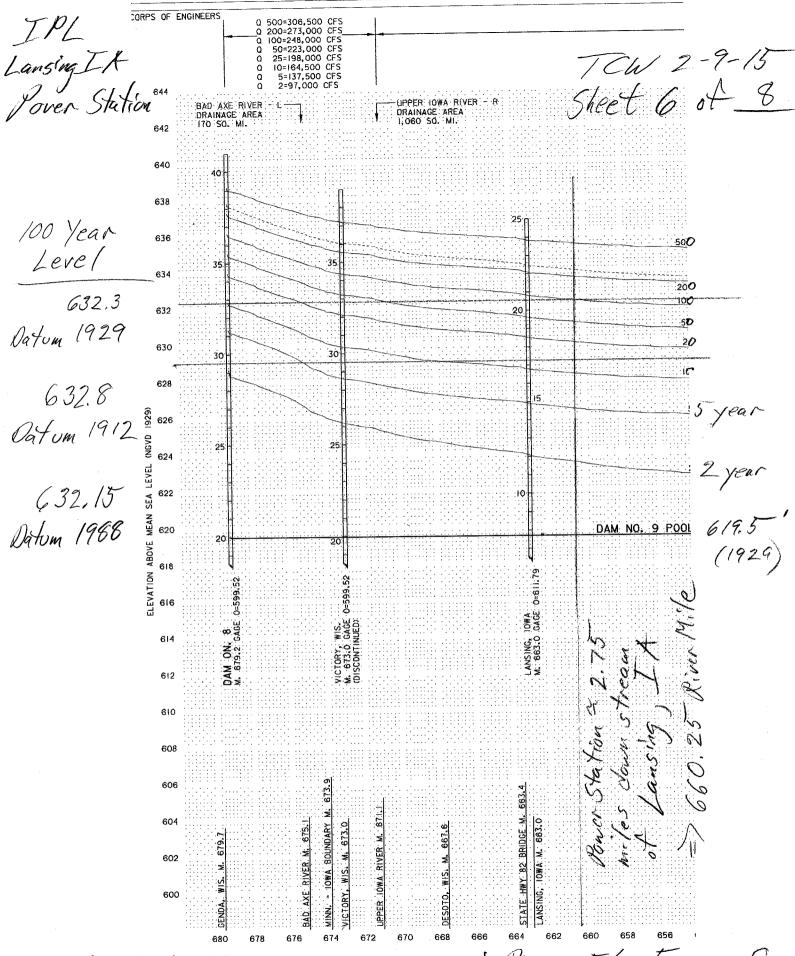
SYMBOL	BORING SAMPLE	DEPTH	SOIL DESCRIPTION	U.S.C.S. L.L.	PL W%
0	58-1	40-50	SAND I GRAVEL	3W/64/	16.5
山	SB-3	27-32		- 11	13.4
1	58-5	22-27,5	(,	(1	32.1
V	SB-5	44-45	1,	1,	9.8
0	SB-7	46-50	- 11	'(35.7

APPENDIX C – Flood Elevations for Mississippi River Pool #9

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

Structural Stability Assessment





Ref: USACE Upper Mississippi River Flow Frequency Quer

APPENDIX D – Construction Details Weir Box #1

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

Structural Stability Assessment



