

May 28, 2026  
File No. 25225228.00

Ms. Amanda Blank  
Lansing Generating Station  
2320 Power Plant Drive  
Lansing, IA 52515

Subject: Groundwater Monitoring System Update - Certification  
Former Lansing Generating Station  
2320 Power Plant Drive, Lansing, Allamakee County, Iowa

Dear Ms. Blank:

The groundwater monitoring system at the former Lansing Generating Station (LAN) was updated in 2025. Monitoring well MW-303R has replaced MW-303 as a downgradient compliance monitoring well. MW-303 has been removed from the groundwater monitoring system.

This letter certifies, pursuant to 40 CFR 257.91(f), that the monitoring system is designed and constructed to meet the requirements of 40 CFR 257.91. The monitoring network is sufficient to reasonably and accurately represent the quality of background groundwater that has not been affected by leakage from the coal combustion residuals (CCR) unit, and the quality of groundwater passing the waste boundary of the CCR unit.

MW-303R is replacing MW-303 in the monitoring network for the following reasons:

- Persistently lower groundwater elevations at MW-303 resulted in insufficient water for semiannual monitoring sample collection during and following closure activities at the former Upper Ash Pond.
- Evaluation of groundwater elevations following closure activities at the former Upper Ash Pond indicated that groundwater elevations at MW-303 were not expected to return to levels that would allow for effective sampling of MW-303.
- MW-303R was installed adjacent to the abandoned MW-303 location.
  - MW-303R was installed in the same uppermost aquifer unit as MW-303.
  - The screened interval at MW-303R overlaps the screened interval at MW-303 and extends approximately 8 feet below it.

Based on the design information provided for our review, the number, spacing, and depths of the monitoring system, components were determined using site-specific information in accordance with 40 CFR 257.91(b).



The groundwater monitoring system consists of one upgradient and three downgradient monitoring wells, which meets the minimum requirements of 40 CFR 257.91(c)(1). The minimum number of monitoring wells is appropriate at the Lansing Generating Station for the following reasons:

- Groundwater flow in the uppermost aquifer at the site is to the northwest, parallel to the axis of the valley in which the landfill and pond are located.
- The monitored CCR units are aligned with the direction of groundwater flow.
- The width of the downgradient zone perpendicular to groundwater flow is less than 700 feet. The maximum spacing between downgradient wells MW-301, MW-307, and MW-303R is approximately 350 feet.



The groundwater monitoring system at the Lansing Generating Station is a multiunit system. The Lansing Generating Station includes two existing CCR units:

- LAN Landfill (closed 2023)
- LAN Upper Ash Pond

The multiunit system is designed to detect monitored constituents at the waste boundary of the facility as required by 40 CFR 257.91(d), which is appropriate based on the arrangement of the CCR units and their orientation with respect to groundwater flow in the uppermost aquifer.

Based on the installation documentation for placement in the site operating record to meet the requirements of 40 CFR 257.105(h)(2) and provided for our review, the monitoring wells have been cased in a manner that will maintain the integrity of the monitoring well borehole and were constructed in accordance with the requirements of 40 CFR 257.91(e). Installation documentation provided includes regional hydrological information, boring logs, groundwater flow maps from October 2024 through October 2025, hydraulic conductivity test results for monitoring system wells, and well construction information.

**PE Certification**

	<p>I, Eric J. Nelson, hereby certify that the groundwater monitoring system at the Lansing Generating Station has been designed and constructed to meet the requirements of 40 CFR 257.91. This certification is based on my review of documentation in the operating record regarding the design, installation, and development of the groundwater monitoring system components. I am a duly licensed Professional Engineer under the laws of the State of Iowa.</p>
	<p></p>
	<p>05/28/2026</p>
	<p>(signature) (date)</p>
	<p>Eric J. Nelson</p>
<p>(printed or typed name)</p>	
<p>License number <u>23136</u></p>	
<p>My license renewal date is December 31, 2026.</p>	
<p>Pages or sheets covered by this seal:</p>	
<p>Groundwater Monitoring System Update – Certification, all pages.</p>	

Sincerely,



Eric J. Nelson, PE  
Project Director  
SCS Engineers



Thomas J. Karwoski  
Senior Project Manager  
SCS Engineers

MDB/TR\_lmh/BRK/EJN

cc: Jeff Maxted, Alliant Energy  
Matt Bizjack, Alliant Energy

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