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VIA EMAIL

October 30, 2020

Mr. Jeffrey Maxted Alliant Energy – Environmental Services Manager 4902 North Biltmore Lane Madison, WI 53718-2148

Re: Unstable Areas Determination CCR Surface Impoundments - §257.64 Interstate Power and Light Company (IPL) Lansing Generating Station Lansing, Iowa

Mr. Jeffrey Maxted,

This Unstable Areas Determination has been 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 (CCR) 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 letter assesses the factors of one CCR unit at Interstate Power and Light Company (IPL), Lansing Generating Station (LAN) in Lansing, Iowa in accordance with the CCR Rule §257.64 Unstable Areas. For purposes of this Report, "CCR unit" refers to an existing or inactive CCR surface impoundment.

Background Information

In accordance with the requirements set forth in §257.64 of the CCR Rule a CCR unit must not be located in an unstable area. The owner or operator must consider all the following factors:

- On-site or local soil conditions that may result in significant differential settling,
- On-site or local geologic or geomorphologic features; and,
- On-site or local human-made features or events (both surface and subsurface).

Facility Specific Information

LAN is located at 2320 Power Plant Drive, Lansing, Iowa. Figure 1 provides both a topographic map and an aerial of the LAN facility location, with the approximate property boundary of the facility identified. LAN has one existing CCR surface impoundment (Figure 2), which is the LAN Upper Ash Pond.

Differential Settling

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 topsoil 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, Exhibit A.

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 (Exhibit B) and supported the embankment without substantial settlement after construction.

In 2015, a subsurface soil investigation was undertaken to collect soil samples and determine the insitu 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 (Figure 2). The density information along with soil test results for water content, grain size, and Atterberg limits (Exhibit B) indicate the current conditions of the embankments as they were constructed in 1974.

The test results indicate that the embankment is constructed of uniform, fine to medium sand (SP). The sand was compacted to medium dense to dense consistency as shown by the SPT results. Below the embankment, the two northern borings SB-1 and SB-7 (Figure 2) show that a very loose to loose silt is present under the embankment overlying a medium dense gravel. In borings SB-3 and SB-5 (Figure 2) the silt is thin and overlies the same gravel. The silt deposit in the two northern borings is from backwater deposition by the Mississippi River prior to the installation of the LAN Upper Ash Pond and the thin silt layer to the south is natural deposition from flooding of the Unnamed Stream #1.

The silt layer under the northern embankment of the LAN would have compressed under the load from installing the embankment in 1974. Annual inspections of the embankment and topographic surveys completed in 2015 show the northern embankment was built to its design elevation and has not settled since the embankment was installed. The loose silt is susceptible to liquefaction

settlement from an earthquake. However, the LAN site is not in an area of strong ground motion to induce liquefaction.

The Iowa Bedrock Survey Map (Exhibit C), available from the Iowa Geology and Water Survey, July 2013 indicates that bedrock is at an approximate elevation of 560 feet (depth of 90 feet below top of embankment) in the northern part of the LAN Upper Ash Pond and rises in elevation moving south up the valley of the Unnamed Stream #1.

Based on the known geotechnical information, LAN impoundments are not susceptible to significant differential settlement from liquefaction of the silt layer. Additionally, annual inspections of the embankments for the last 4 years have indicated no observable areas of differential settlement on the embankments.

Geologic and Geomorphologic Features

The Bedrock Geologic Map of Iowa (Exhibit C) shows that the site contains up to five types of bedrock formations: Prairie du Chien Group, St. Peter Sandstone, Jordan Sandstone, St. Lawrence, and Lone Rock Formations. The formations are comprised of dolomite and siltstone. The Iowa Bedrock Survey Map available from the Iowa Geology and Water Survey, July 2013 indicates that bedrock is at an approximate elevation of 560 feet (depth of 90 feet below top of embankment) in the northern part of the LAN Upper Ash Pond and rises in elevation moving south up the valley of the Unnamed Stream #1.

Karst formations in Iowa are predominately in the northeast part of the state, see Exhibit D, which is where LAN is located. An Iowa Department of Natural Resources map of known and potential karst terrain and/or paleosinks (sinkholes) near LAN has also been included in Exhibit D. This map shows that the LAN is located inside an area potentially susceptible to karst formations. A sinkhole has been identified approximately 2,000 feet east of the LAN Upper Ash Pond. The mapped location of the sinkhole is approximately 300 feet higher than the impoundment. As presented within the SCS Engineers Unstable Areas Compliance Demonstration¹ for the onsite landfill, The Galena Group, which consists of limestone and dolostone, has identified paleosinks within Allamakee County and is stratigraphically above the weathered sandstone unit observed in many borings installed throughout the LAN Upper Ash Pond and the landfill site. As a result, it is unlikely that karst conditions are present below the impoundment.

Several figures and tables have been included in Exhibit E which have been provided by SCS Engineers. These figures show that the local shallow groundwater direction descends from the bluffs as well as generally moving northward to the Mississippi River. The measurement of occasional downward gradient in the nested wells likely results from the silt layer discussed above acting as an aquitard separating the upper ground water in the valley from the deeper ground water of the Mississippi River elevation. Additionally, water recharging the valley groundwater from operations at LAN is at or above a pH of 7. As a result, there is no risk for the formation of paleosinks.

¹ Unstable Areas Demonstration Lansing Landfill, SCS Engineers, October 2018

Human-made Features or Events

Generally, man-made risks to the stability of CCR impoundments can include such events as: large dam failure, failure due to improper cut and fill during construction, excessive drawdown of groundwater, extreme fluctuations in flooding from human-made changes, or failure due to underground mining. Based on the information provided herein, the LAN Upper Ash Pond are is not susceptible to anthropogenic activities.

Unstable Areas Determination

After review of the reasonably and readily available documentation, we determine that the LAN Upper Ash Pond is not located in unstable area.

Qualified Professional Engineer Certification

The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer attesting that the documentation as to whether a CCR unit meets the requirements 40 CFR 257.64(b).

To meet the requirements of 40 CFR 257.64(c), 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 257.64.

MARK W. LOEROP ZELEN

By:

Name

LOSERO

Data

cc: Tony Morse, Alliant Energy

Robert Solak, Hard Hat Services

att:

Figure 1 – Site Location

Figure 2 – Soil Boring Locations

Exhibit A – 1974 Drawings

Exhibit B – 2015 Investigation

Exhibit C – Iowa Bedrock Man

Exhibit D – Iowa Karst Maps

Exhibit E – Groundwater Info from SCS Engineers

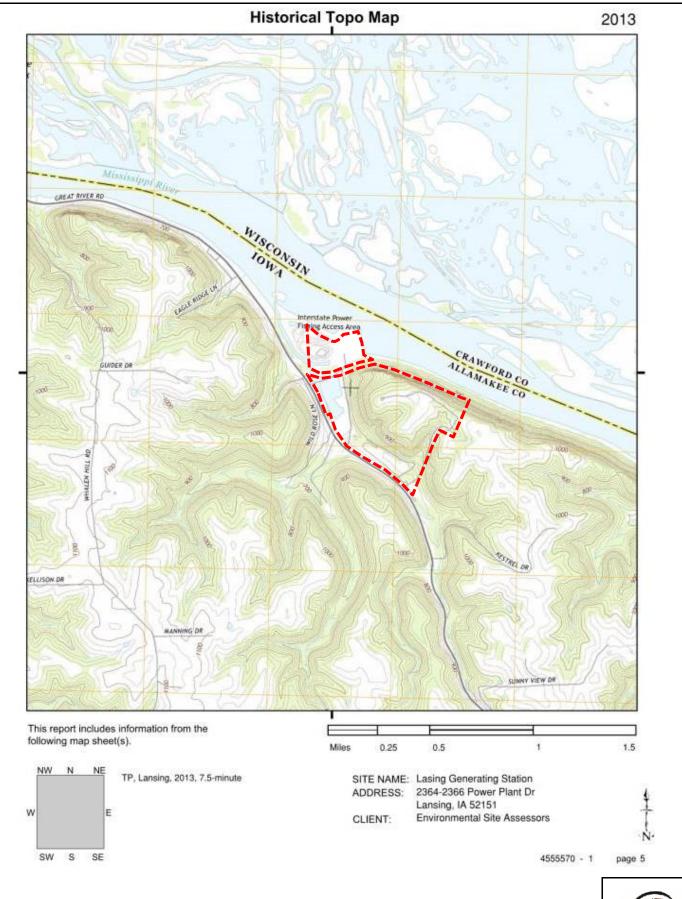
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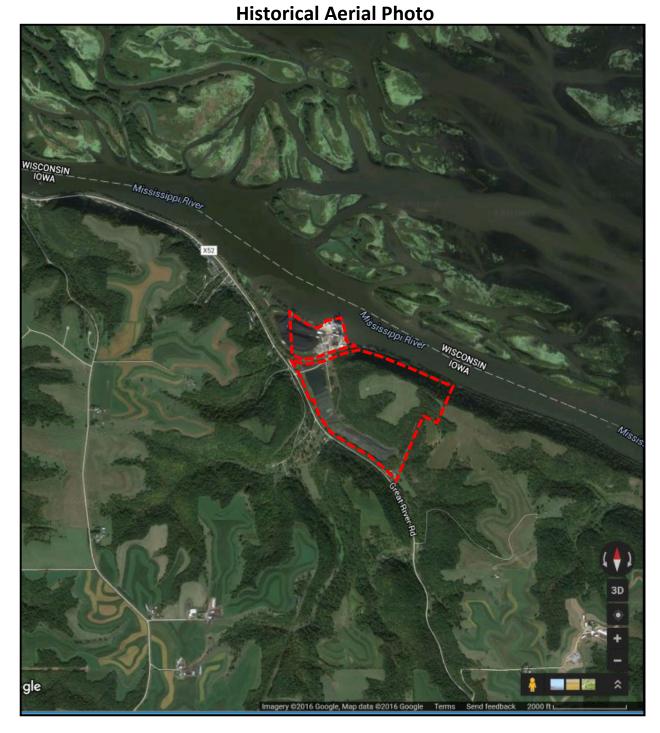
FIGURES

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

Unstable Area Determination
Figure 1 – Site Location
Figure 2 – Sail Baring Location

Figure 2 – Soil Boring Locations





Approximate Property Boundary

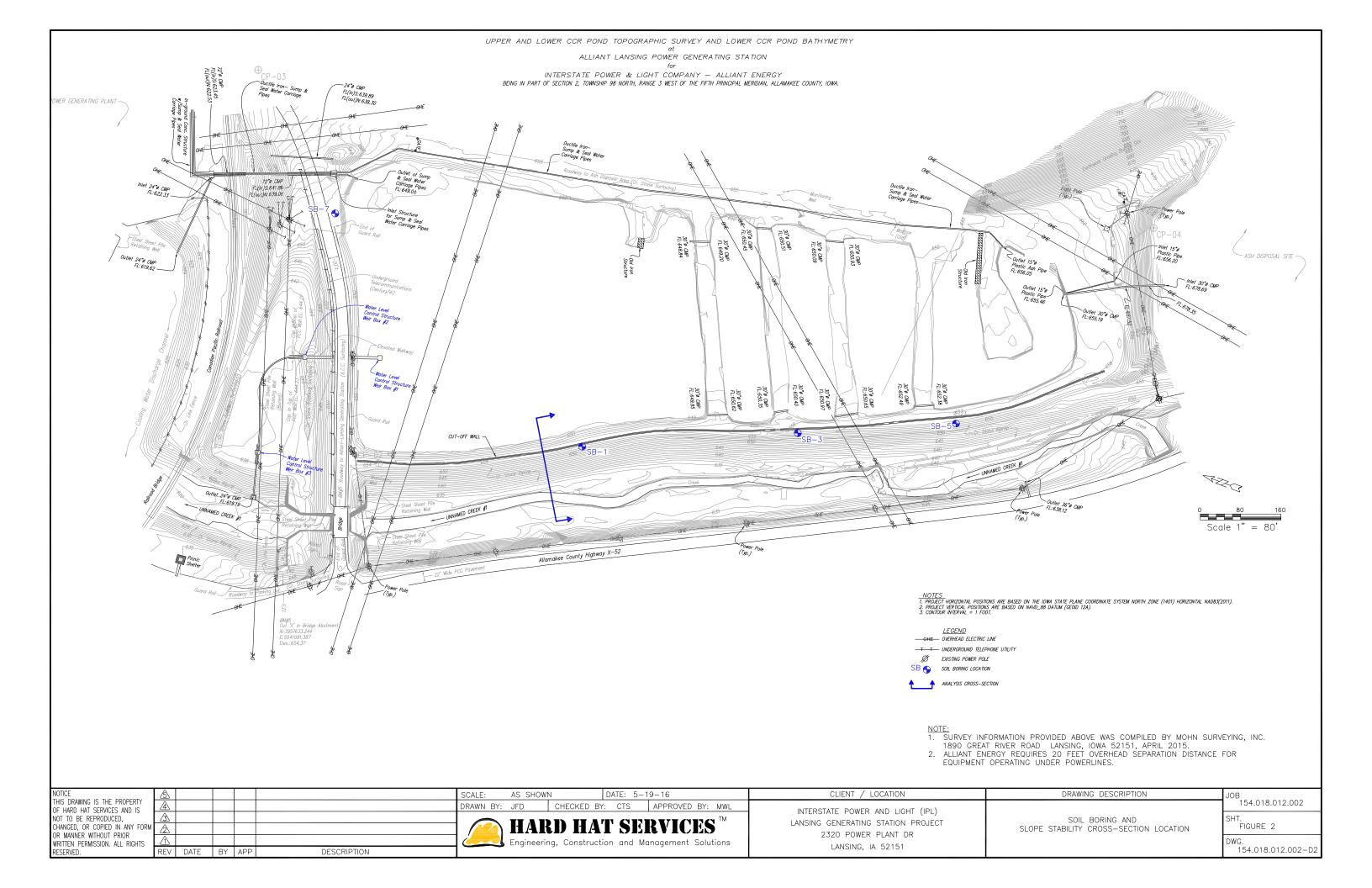
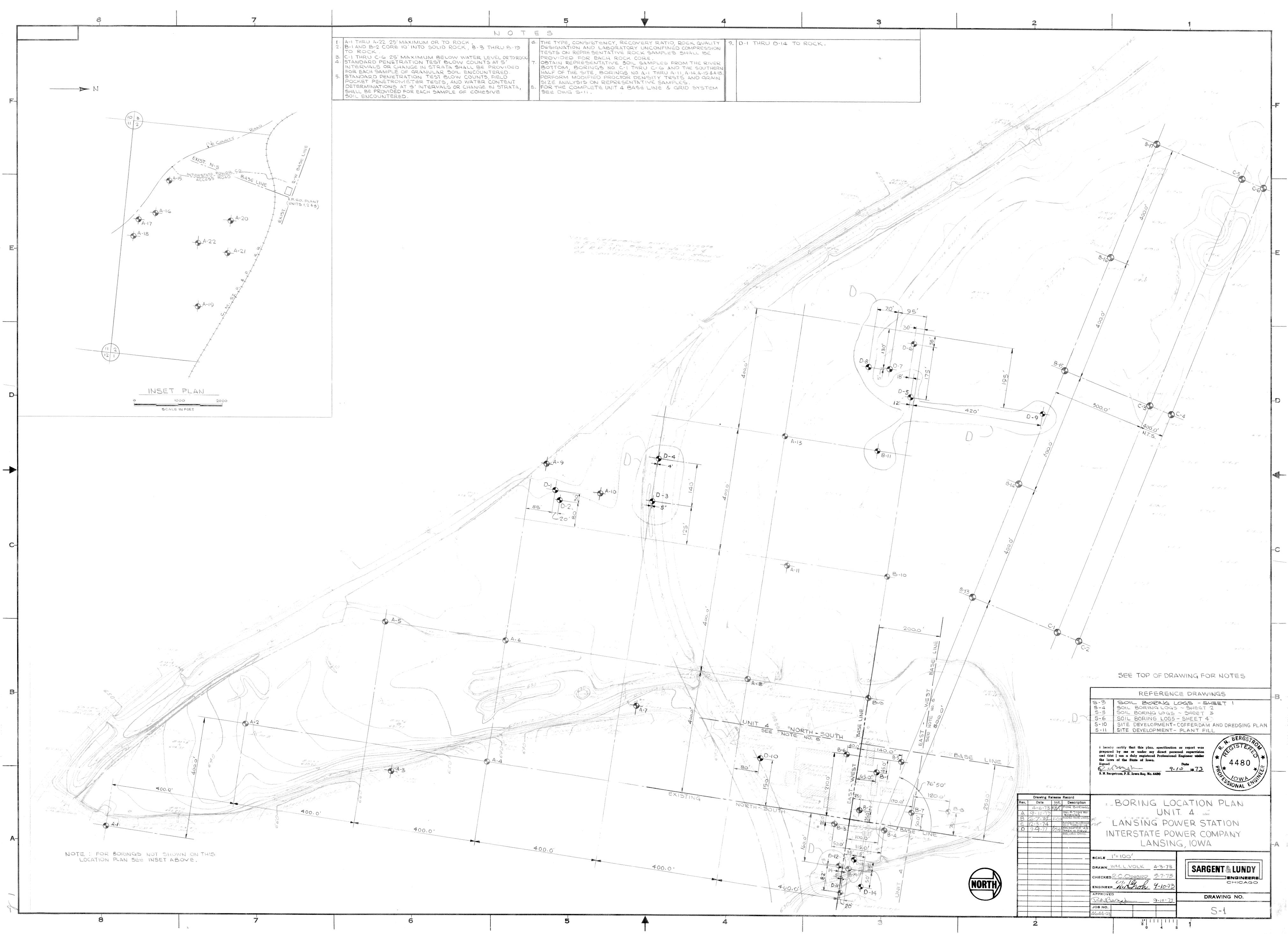


EXHIBIT A – 1974 Drawings

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





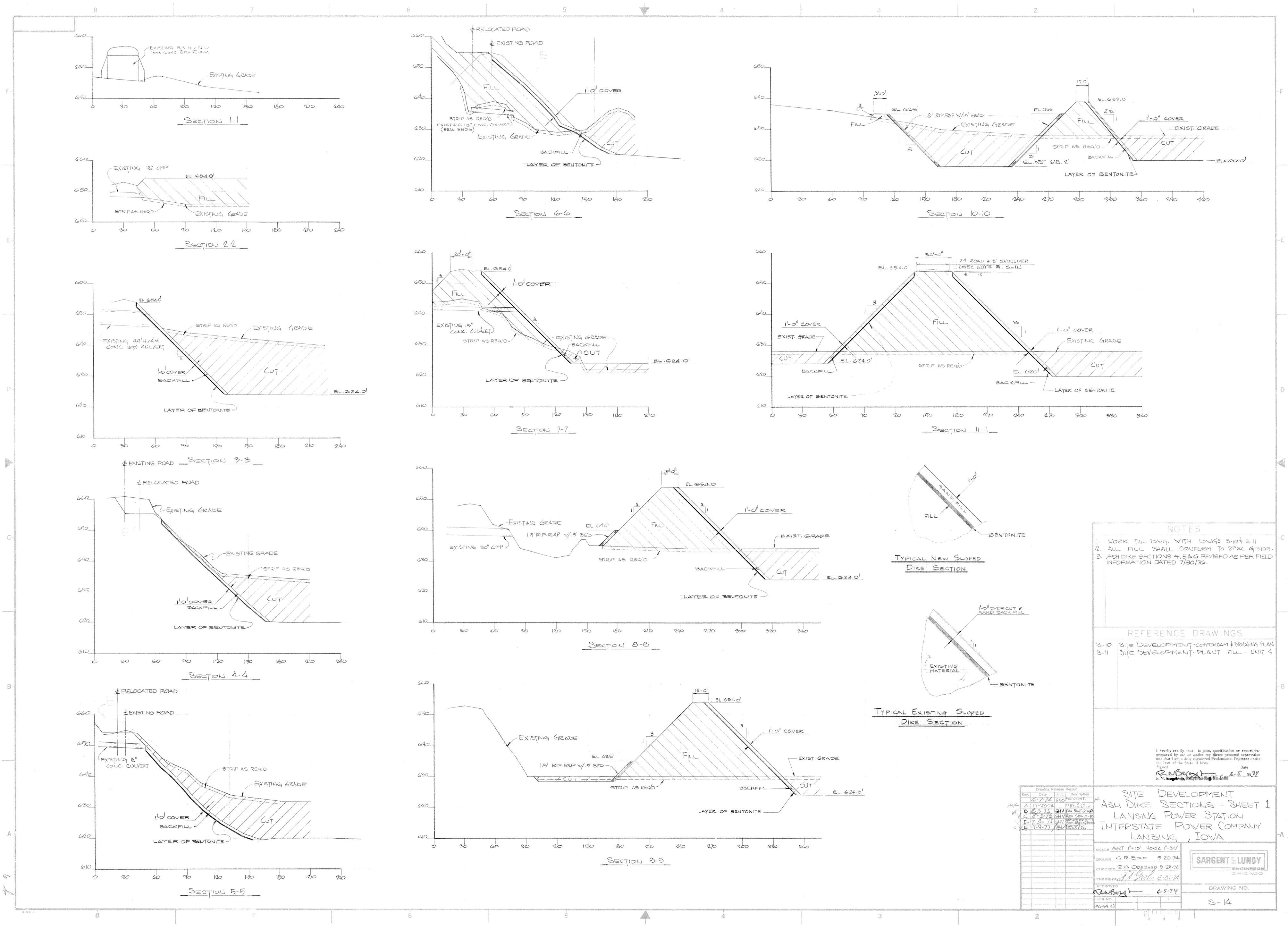


EXHIBIT B – 2015 Investigation

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



CLIENT: Hard Hat

N NOT SURVEYED COORDINATES: E NOT SURVEYED

1" PVC temp well installed @ 50'. 10' screen, natural sand pack

BORING NO.: SB1

page 1 of 1

PROJECT: Lansing, IA

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PROFIL SILT; brown; plastic; moist; trace clay 9.0 18" SS1 4 4 5 SAND; brown; fine grained; poorly graded; well 15.0 -4 sorted; dry to moist SS2 18" 4 5 10 18" 15.0 1'-5' sample collected for geotech analysis 3 6 9 883 -8 20.0 18" 7 9 11 SS4 @ 9'2" black stained with plant matter 23.0 18" 7 10 13 SS5 29.0 18" 7 11 18 -14SAND; gray; fine to medium grained; moist; SS6 ∇ graded; trace gravel and snail shells -16 25.0 SS7 18" 8 11 14 @ 15' grades wet -18 24.0 18" 8 11 13 SS8 15'-20' sample collected for geotech analysis -20 @17.5' grades brown 22.0 18" 8 11 11 889 14.0 -2418" 4 7 7 SS10 @23.5' grades fine to coarse, well graded -26 8.0 SS11 18" 2 3 6 SILT; gray; non plastic; wet; trace clay -28 0.0 18" 0 0 0 28'-32' sample collected for geotech analysis SS12 -30 0.0 @29' grades trace plant matter and snail shells **SS13** 18" 0 0 0 -32 3.0 -34 SS14 18" 1 1 2 -36 8.0 18" 3 4 4 SS15 -38GRAVEL; brown; coarse; poorly graded; wet; 20.0 18" 0 9 11 SS16 trace cobbles -40 40'-50' sample collected for geotech analysis 21.0 18" 5 11 10 SS17 12.0 -44 18" 4 5 7 SS18 -46 12.0 18" 3 4 8 SS19 SAND; light gray; coarse grained; poorly graded; wet -48-50 Bottom of boring @ 50' -52

-54



CLIENT: Hard Hat

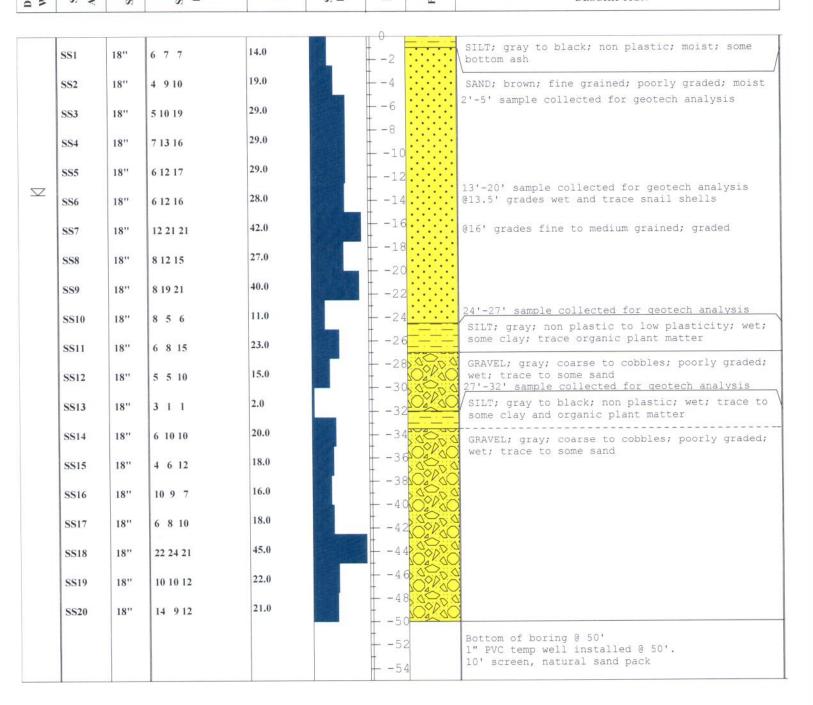
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BORING NO.: SB3

page 1 of 1

PROJECT: Lansing, IA

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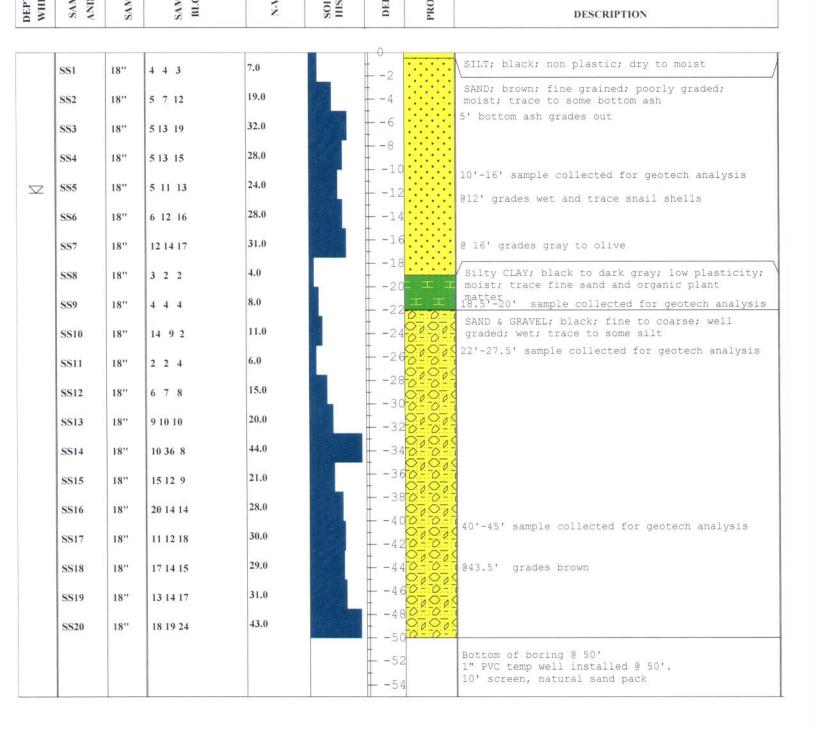
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page 1 of 1

PROJECT: Lansing, IA

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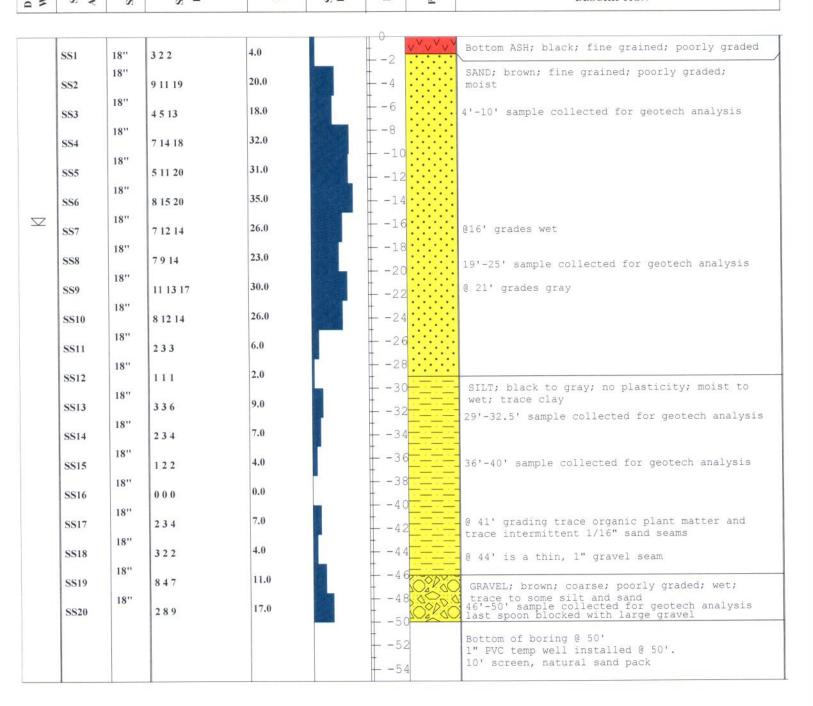
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page 1 of 1

PROJECT: Lansing, IA

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HARD HAT SERVICES

Distribution Particle Size

Project IPL Lansing Generating Station
SB-1, SB-3 & SB-5 "SAND & GRAVEL"

Tested By Test America

Boring No.

Date

2/3/2015

Boring No. Project

PERCENT FINER BY WEIGHT 100 50 60 70 80 90 10 20 30 40 OPENINGS U.S. STANDARD SIEVE 1.5" 3/4" SIEVE ANALYSIS 100 PARTICLE DIAMETER IN MM 20 40 60 80 140 200 HYDROMETER ANALYSIS

HARD HAT SERVICES

PLATE

DEPARATE BIRX

Particle Size

IPL - Lansing Generating Station SB-1, SB-3 & SB-5 "SANDY SILT" Tested By Test America

Distribution Date 2/3/2015

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

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DRAWING DESCRIPTION

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BY APP

INCORPORATE IPL COMMENTS

DESCRIPTION

SYMBOL BORING DEPTH (FT.)

SOIL DESCRIPTION

U.S.C.S. SW/GW

W%

SAND & GRAVEL SAND & GRAVEL

SW/GW SW/GW

32.1 13.4 16.5

SW/GW

8.6

SAND & GRAVEL

SB-5

22-27.5 44-45

SB-3 SB-1

27 - 32 40-50 COBBLES

coarse

fine

coarse medium

fine

SILT AND CLAY FRACTION

SAND

GRAVEL

HARD HAT SERVICES Engineering, Construction and Management Solution

Distribution Particle Size

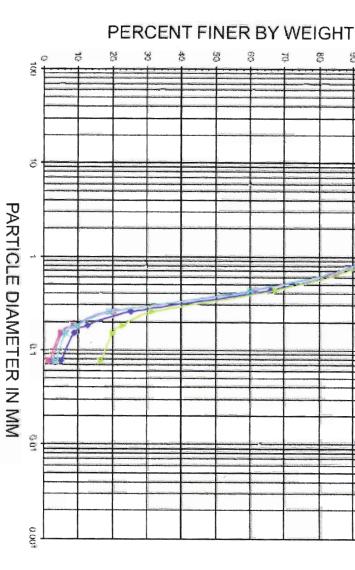
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Project Baring No. IPL Lansing Generating Station SB-1, SB-3 & SB-5 "UPPER SAND" Tested By Test America Date 2/3/2015

OPENINGS U.S. STANDARD SIEVE 1.5 34 SIEVE ANALYSIS 20 40 60 80 140 200 HYDROMETER ANALYSIS

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9



<u>د</u> ب دې	SP	Medium - Fine Sand	10-16	SB-5	×
19.0	SP	Medium - Fine Sand	13-20	SB-3	×
3.1	SM	Sity Medium - Fine Sand	2-5	SB-3	×
20.1	Sp	Medium - Fine Sand	15-20	SB-1	M
4.1	SP	Medium - Fine Sand	1-5	SB-1	N
N. S.	U.S.C.S.	SOIL DESCRIPTION	DEPTH (FT.)	SYMBOL BORING	SYMBOL

COBBLES

coarse

fine

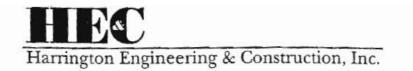
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SILT AND CLAY FRACTION

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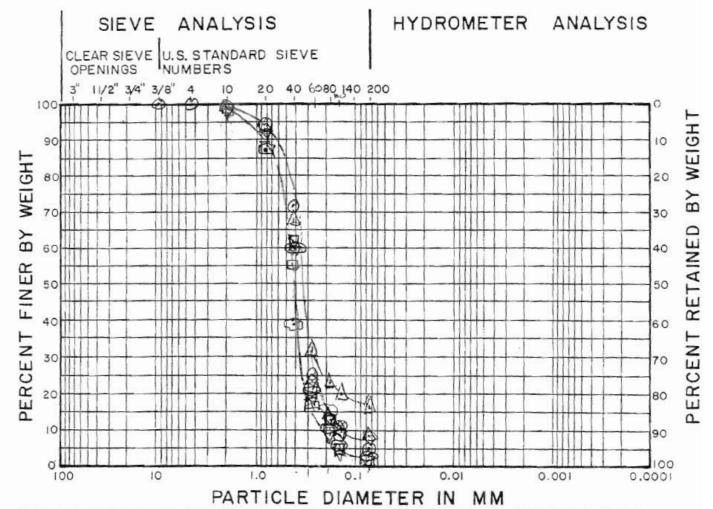
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Particle Size Distribution

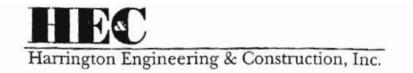
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COBBLES	GRA	VEL	SAND			CUT AND OLAY FRACTION
CUBBLES	coarse	fine	coarse	medium	fine	SILT AND CLAY FRACTION

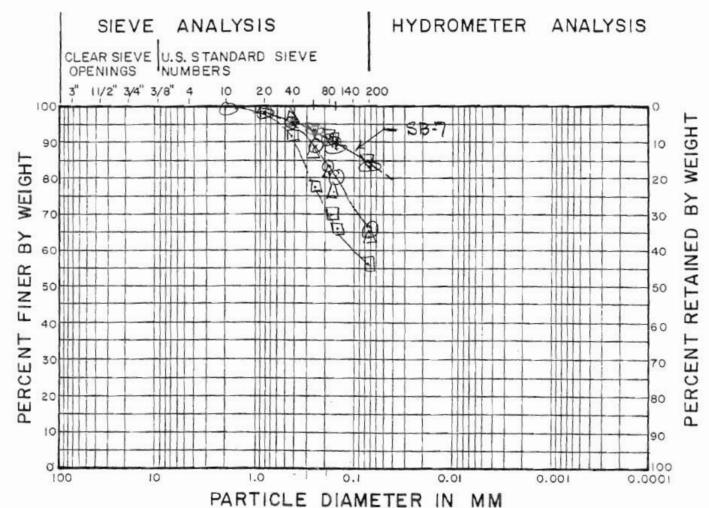
SYMBOL	BORING SAMPLE	DEPTH	SOIL DESCRIPTION	U.S.C.S. L.L.	PL W%
0	58-1	1-5	MED-FINE SULD	SP	14.1
- CI	SB-1	15-20	11	SP	201
	SE-3	2-5	SILTY MED-FOUE SAUD	SM	3.1
V	38-3	13-20	MEW - FOUE SAULA	48	19.0
0	SB-5	10-16	11	SP	13.3
0	SB-7	4-10	1,	S PSM	3.1
1	98-7	R-25	1.	SP	17.1



Particle Size Distribution

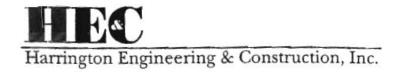
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COBBLES GRAVEL SAND SILT AND CLAY FRACTION

		AMPLE	DEPTH	SOIL DESCRIPTION	U.S.C.S.	L.L.	RL	W %
0	SB-1		28-32	SANDY STUT	ML	28	26	36,1
DIS	SB-3		24.5-27	SLUDY 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

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	SWOY	GRAVEL	

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PARTICLE DIAMETER IN MM

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

EXHIBIT C – Iowa Bedrock Map

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

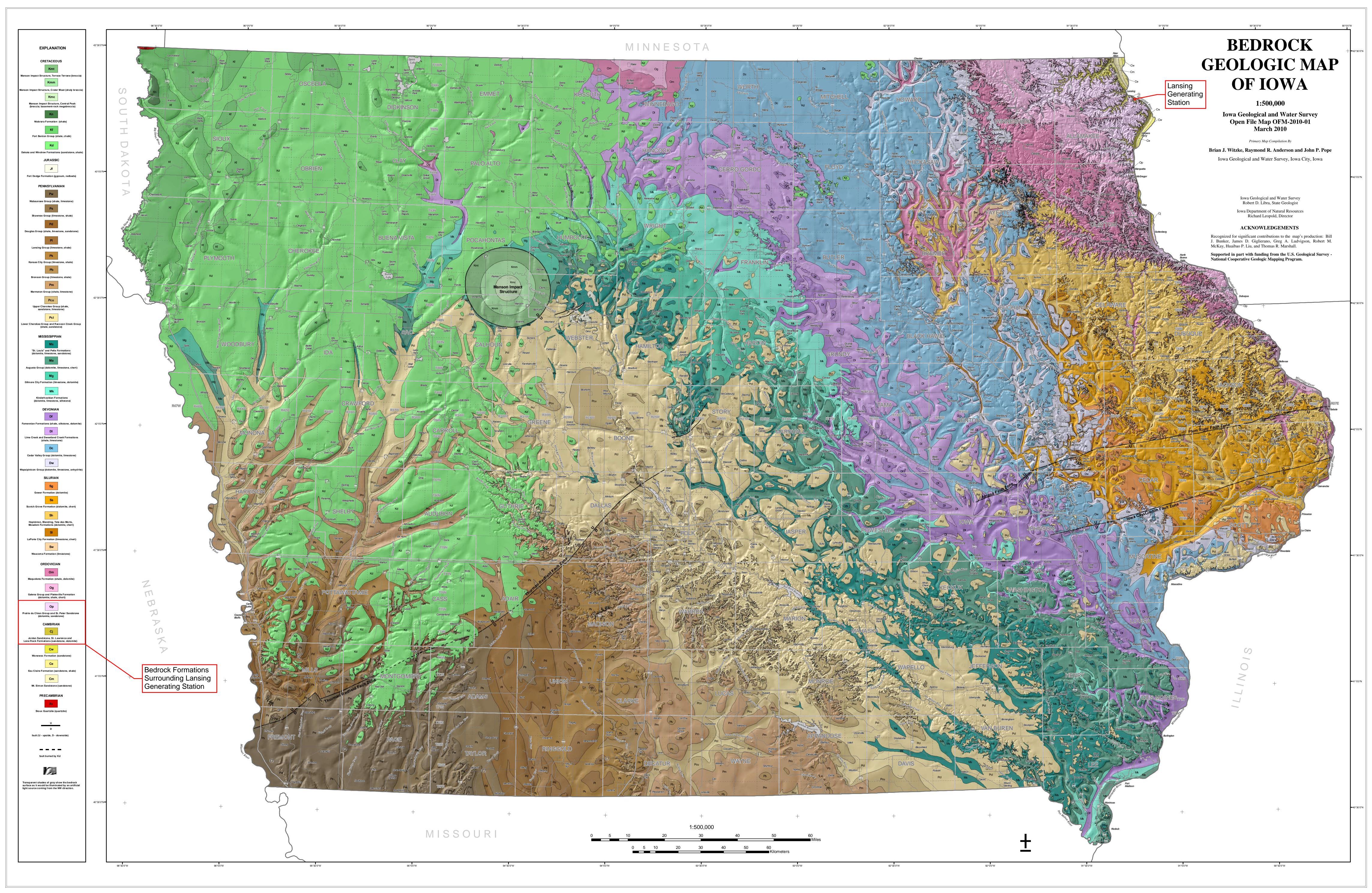
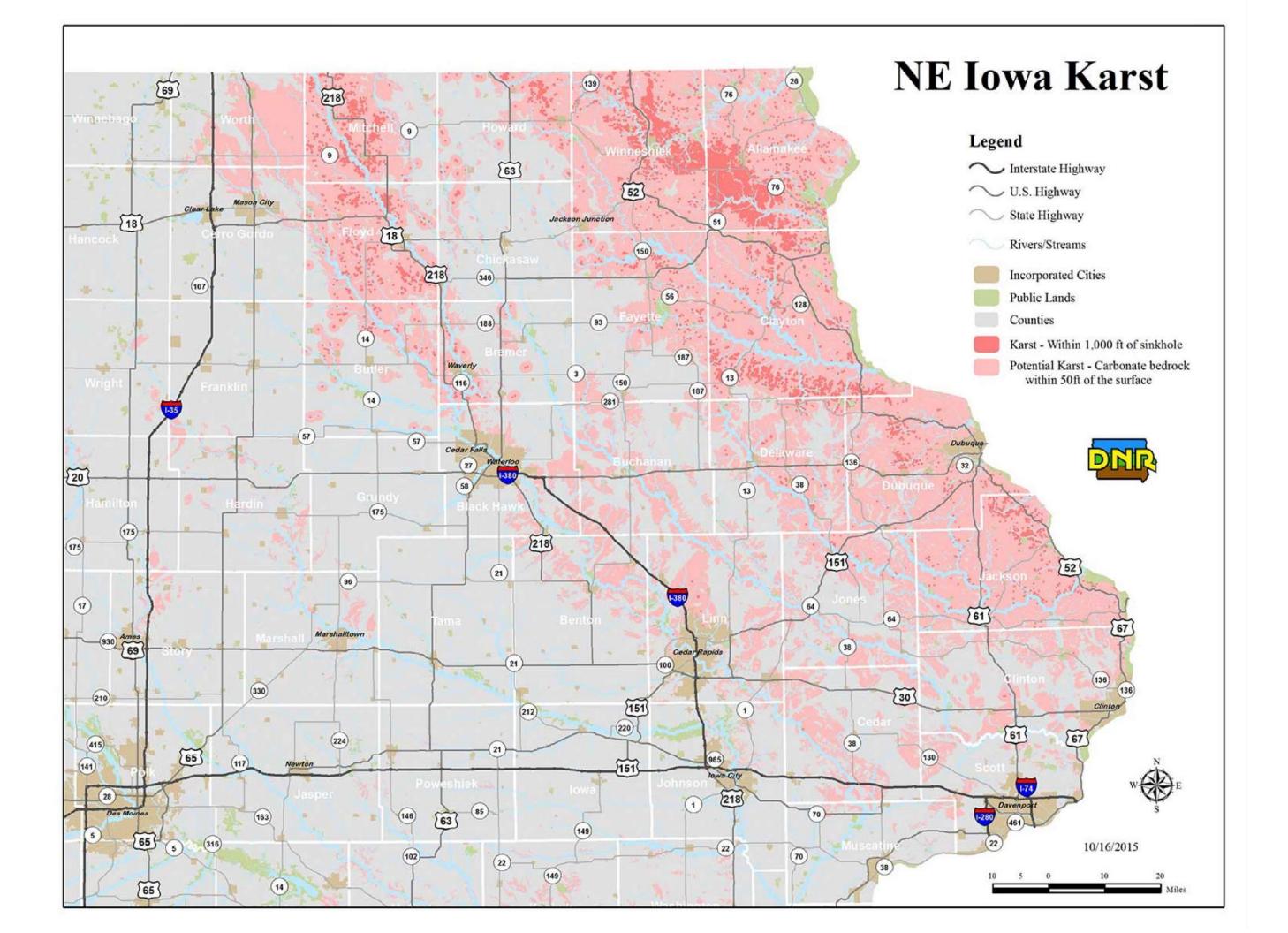


EXHIBIT D – Iowa Karst Maps

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



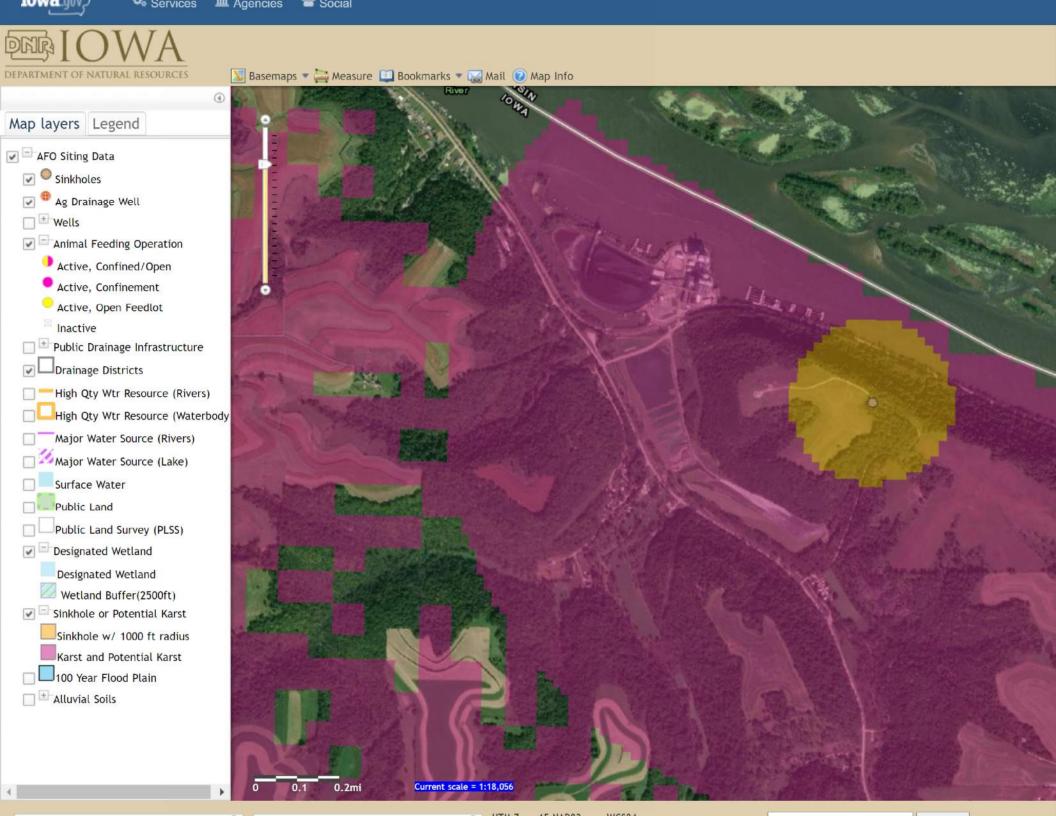
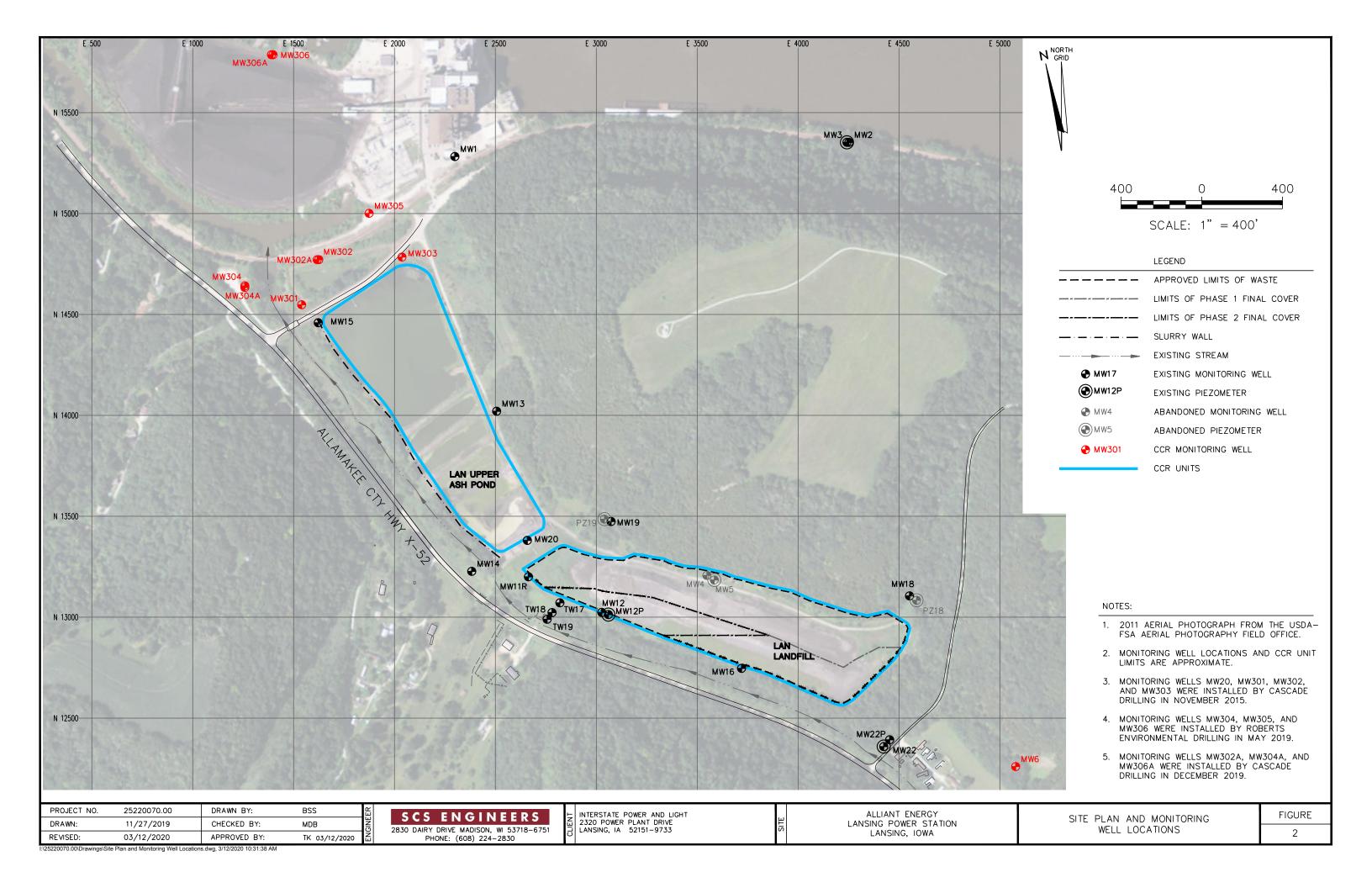


EXHIBIT E – Groundwater Info from SCS Engineers

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



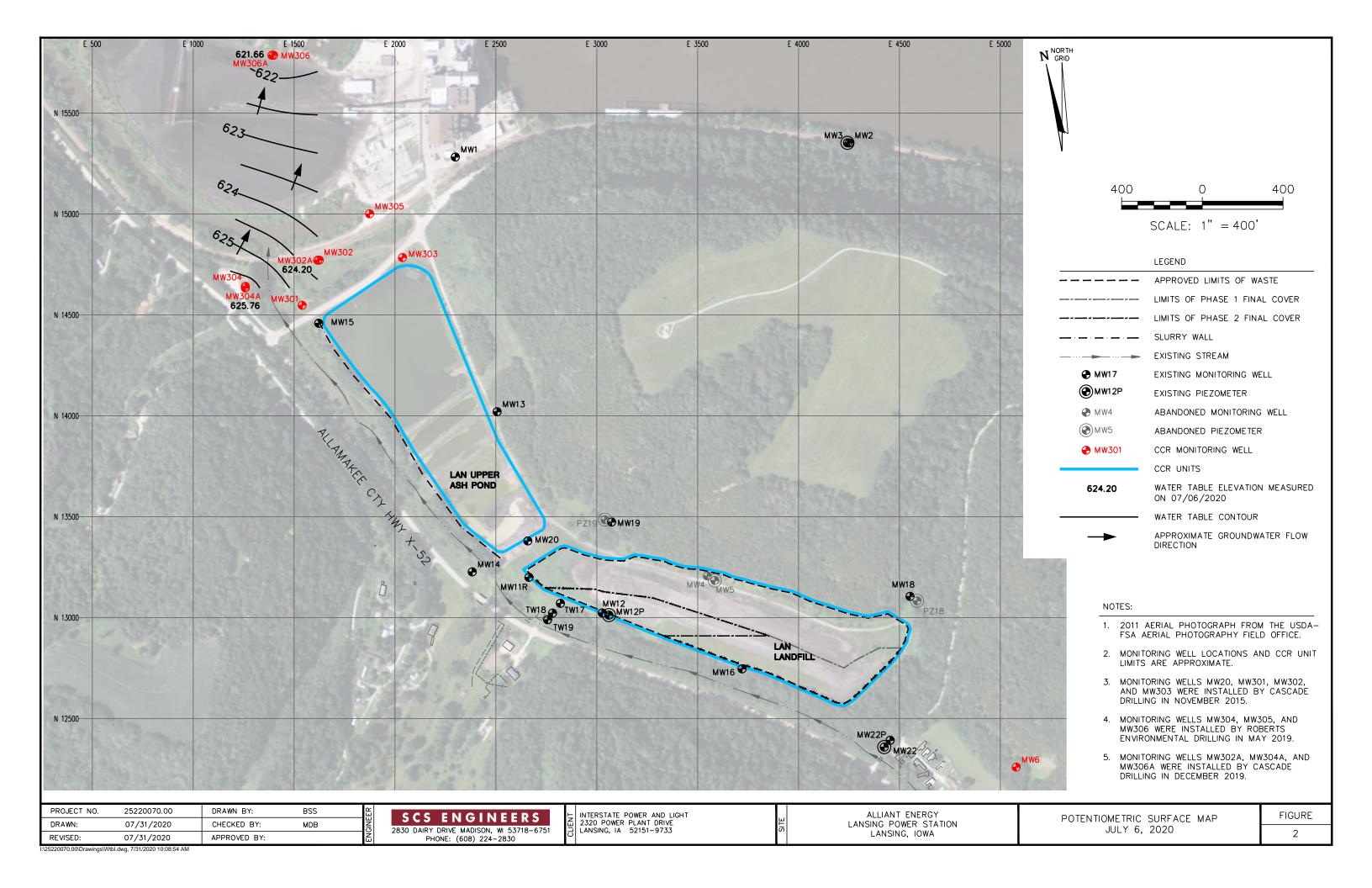


Table 3. Vertical Hydraulic Gradient Summary Interstate Power & Light - Lansing, Iowa / SCS Engineers Project #25220070.00

	MW4/MV	W5	MW2/M	W3	MW12/MV	V12P	MW22/MV	N22P
Vertical Hydraulic Gradients								
Monitoring Well	MW4		MW2		MW12		MW-22	
screen bottom (feet amsl)	640.00		610.50		642.70		650.27	
screen bottom (leet amsi)	040.00		610.30		642.70		650.27	
Piezometer	MW5		MW3		MW12P		MW-22P	
effective screen midpoint (feet amsl)	625.00		595.00		625.48		622.64	
checuve screen mapoint (reet arisi)	023.00		373.00		023.40		022.04	
	Distance between	Vertical						
Measurement Date	screen midpoints (feet)	Gradient (ft/ft) (1)						
May 11, 2001	21.8	0.055	24.5	0.031	NI VI	NI	NI ,	NI
March 8, 2002	20.3	0.061	20.4	0.036	NI	NI	NI	NI
February 19, 2004	19.4	0.064	NM	NM	NI	NI	NI	NI
May 26, 2004	21.4	0.059	NM	NM	NI	NI	NI	NI
August 23, 2004	21.1	0.058	NM	NM	NI	NI	NI	NI
November 18, 2004	20.4	0.060	NM	NM	NI	NI	NI	NI
May 5, 2005	20.2	0.062	NM	NM	NI	NI	NI	NI
May 19, 2006	20.2	0.061	NM	NM	NI	NI	NI	NI
May 30, 2007	20.1	0.061	NM	NM	NI	NI	NI	NI
April 16, 2008	22.0	0.057	NM	NM	NI	NI	NI	NI
April 3, 2009	22.9	0.054	NM	NM	NI	NI	NI	NI
April 21, 2010	21.1	0.059	NM	NM	NI	NI	NI	NI
May 4, 2011	21.8	0.057	NM	NM	NI	NI	NI	NI
April 25, 2012	20.9	0.060	NM	NM	NI	NI	NI	NI
October 17, 2012	20.4	0.061	NM	NM	NI	NI	NI	NI
February 19-20, 2013	20.4	0.061	20.3	0.061	NI	NI	NI	NI
April 1, 2013	21.1	0.058	20.6	0.054	NI	NI	NI	NI
July 1, 2013	25.6	0.046	23.2	0.034	NI	NI	NI	NI
April 29, 2014	22.1	0.057	NM	NM	21.7	-0.013	NI	NI
May 29, 2014	21.8	0.013	22.4	0.006	21.4	-0.015	NI	NI
April 20, 2015	21.0	0.059	20.3	0.034	21.0	-0.013	NI	NI
April 28, 2016	20.8	0.060	20.4	0.028	20.9	-0.002	NI	NI
April 19-21, 2017	24.4	0.048	21.3	-0.001	22.7	-0.012	36.7	-0.025
April 16-17, 2018	ABANDO		20.7	-0.161	22.0	-0.016	NM	NM
April 26, 2018	ABANDO		20.7	-0.156	21.7	0.036	35.6	-0.031
April 15-16, 2019	ABANDO		26.3	-0.143	23.0	-0.016	38.0	-0.048
June 20, 2019	ABANDO		NM	NM	NM	NM	NM	NM
October 2, 2019	ABANDO		NM	NM	NM	NM	NM	NM
December 5, 2019	ABANDON		NM	NM	NM	NM	NM	NM
February 5, 2020	ABANDO		NM	NM	NM 22.4	NM	NM	NM
May 20-21, 2020 July 6, 2020	ABANDO! ABANDO!		20.6 NM	0.037 NM	23.1 NM	-0.018 NM	38.6 NM	-0.044 NM
August 19-21, 2020	ABANDOI		NM	NM	NM	NM	NM	NM
October 19-21, 2020	ABANDO		20.4	0.041	22.8	-0.016	38.1	-0.044
OCIODEI 19-20, 2020	ADAINDUI	NLD	20.4	0.041	22.0	-0.010	30.1	-0.044
			 					
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1: A positive vertical gradient indicates upward groundwater flow. A negative gradient indicates downward flow.

2: The screen midpoint for water table wells is calculated as the midpoint between the water table elevation and screen bottom elevation.

NM: Not Measured

NI: Not Installed

Created by: Date: 10/22/2020 Last revision by: Date: 10/22/2020 Checked by:

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Table 2. Vertical Hydraulic Gradient Summary Interstate Power & Light - Lansing, Iowa / SCS Engineers Project #25220070.00

	MW302/MV	V302A	MW304/MW304A		MW306/MW306A	
Vertical Hydraulic Gradients	ts					
Monitoring Well	MW302		MW304		MW306	
screen bottom (feet amsl)	616.90		620.43		611.48	
Piezometer	er MW302A MW304A		MW306A			
effective screen midpoint (feet amsl)	592.43		591.10		587.06	
	Distance between	Vertical	Distance between	Vertical	Distance between	Vertical
Measurement Date	screen midpoints (feet)	Gradient (ft/ft) (1)	screen midpoints (feet)	Gradient (ft/ft) (1)	screen midpoints (feet)	Gradient (ft/ft) (1)
May 20-21, 2020	29.9	-0.150	29.9	0.111	28.9	-0.001
July 6, 2020	NM	NM	NM	NM	NM	NM
August 19-21, 2020	29.8	-0.135	30.0	NM	28.9	0.009
October 19-20, 2020	29.6	-0.139	29.8	0.101	28.6	0.009

Notes:

- 1: A positive vertical gradient indicates upward groundwater flow. A negative gradient indicates downward flow.
- 2: The screen midpoint for water table wells is calculated as the midpoint between the water table elevation and screen bottom elevation.

NM: Not Measured

NI: Not Installed

Created by:	TK	Date: 10/23/2020
Last revision by:	TK	Date: 10/23/2020
Checked by:	NDK	Date: 10/23/2020

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