

Post-Closure Care Plan Amendment No. 1

Former M.L. Kapp Generating Station
3301 Highway 67 S
Clinton, Iowa 52732

Prepared for:

Interstate Power and Light Company
4902 N. Biltmore Lane
Madison, Wisconsin 53718

SCS ENGINEERS

25222077.00 | June 30, 2022

2830 Dairy Drive
Madison, WI 53718-6751
608-224-2830

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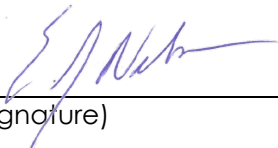
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PE CERTIFICATION

	<p>I, Eric J. Nelson, hereby certify that this amended Post-Closure Care Plan meets the requirements of 40 CFR 257.104(d), was prepared by me or under my direct supervision, and that I am a duly licensed Professional Engineer under the laws of the State of Iowa.</p>
	<div style="display: flex; justify-content: space-between;"> <div style="text-align: center;">  (signature) </div> <div style="text-align: right;"> 6/30/2022 (date) </div> </div>
	<p style="text-align: center;">Eric J. Nelson</p> <p>(printed or typed name)</p>
	<p>License number <u>23136</u></p> <p>My license renewal date is <u>12/31/2022</u>.</p>
	<p>Pages or sheets covered by this seal:</p> <p style="text-align: center;">Post-Closure Care Plan Amendment No. 1</p>

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1.0 INTRODUCTION AND PROJECT SUMMARY

On behalf of Interstate Power and Light Company (IPL), SCS Engineers (SCS) has prepared this amended Post-Closure Care Plan for the closed coal combustion residual (CCR) surface impoundment at the former M.L. Kapp Generating Station (KAP) facility in accordance with 40 CFR 257.104(d) as follows.

40 CFR 257.104(d). *“Written post-closure plan – (1) Content of the plan. The owner or operator of a CCR unit must prepare a written post-closure plan that includes, as a minimum, the information specified in paragraphs (d)(1)(i) through (iii) of this section.”*

According to the January 23, 2018, Post-Closure Plan prepared by Sargent & Lundy, L.L.C. (S&L, 2018), the KAP facility included two small CCR surface impoundments (Primary and Secondary Ponds) operated within the original limits of the Main Ash Pond. The Main Ash Pond area was closed by leaving CCR in place under a final cover system. Therefore, the Main Ash Pond is also subject to the requirements of 40 CFR 257.104.

CCR was consolidated within the Main Ash Pond and the area was closed by covering the CCR with a final cover system as described in the Closure Plan for this CCR unit. IPL is currently conducting post-closure care in accordance with 40 CFR 257.104(b).

The site location is shown on **Figure 1**. **Figure 2** shows the current conditions at the facility and monitoring locations.

2.0 MONITORING AND MAINTENANCE ACTIVITIES

40 CFR 257.104(d)(1)(i). *“A description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed.”*

Monitoring and Maintenance Activities	Frequency
Mowing	Semi-Annually (minimum)
Inspections by Owner/Operator	Quarterly (minimum)
Inspections by Licensed Professional Engineer	As requested by Owner/Operator
Repair to final cover: <ul style="list-style-type: none">• Vegetation• For erosion concerns• For settlement concerns or other events	As needed, determined by inspection
Inspect Groundwater Monitoring System	Quarterly
Repair Groundwater Monitoring System	As needed, determined by inspection
Environmental Monitoring (groundwater)	Semi-Annually

The owner/operator will perform quarterly inspections of the final cover surface and groundwater monitoring systems. If issues are noticed during the inspection, action will be taken to remedy the situation. Eroded areas will be repaired and reseeded. Repairs or replacement will be performed on groundwater monitoring system components as needed.

2.1 FINAL COVER MAINTENANCE

Mowing of the final cover system vegetation will be performed semi-annually during the growing season unless additional mowing is required in response to the vegetation growth rate. If eroded areas are noted during quarterly inspections, IPL will repair and reseed the area.

2.2 GROUNDWATER MONITORING AND SYSTEM MAINTENANCE

Groundwater monitoring wells MW-301, MW 302, MW-303, MW-304, MW-304A, MW-305, MW-306, MW-307, MW-308, MW-309, MW-310, MW-311, and MW-311A have been installed in accordance with 40 CFR 257.90-98. The wells must continue to be maintained and sampled in accordance with 40 CFR 257.90-98.

3.0 POST-CLOSURE PERIOD CONTACTS

40 CFR 257.104(d)(1)(ii). *“The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure period.”*

The contact information for KAP during the post-closure period is as follows:

Alliant Energy
Attn: M.L. Kapp Generating Station Site Manager
4902 N. Biltmore Lane
Madison, WI 53718
(800) 255-4268
CCRProgram@alliantenergy.com

4.0 POST-CLOSURE PERIOD SITE USE

40 CFR 257.104(d)(1)(iii). *“A description of the planned uses of the property during the post-closure period. Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system or the function of the monitoring systems unless necessary to comply with the requirements of the subpart...”*

The final use of the KAP Main Ash Pond is privately owned green space. With this use, there will be no disturbance of the final cover or any other related components.

5.0 CERTIFICATIONS

40 CFR 257.104(d)(4). *“The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the initial and any amendment of the written post-closure plan meets the requirements of this section.”*

Eric J. Nelson, PE, a licensed professional engineer in the State of Iowa, has overseen the preparation of this Post-Closure Care Plan amendment. A certification statement is provided on **page iii** of this plan.

6.0 RECORDKEEPING AND REPORTING

40 CFR 257.104(b)(2)(iii). *“The owner or operator has completed the written post-closure plan when the plan including the certification required by paragraph (d)(4) of this section, has been placed in the facility’s operating record as required by Section 257.105(i)(4).”*

This Post-Closure Care Plan amendment will be placed in the facility’s operating record and on Alliant Energy’s CCR Rule Compliance Data and Information website, as will all future amendments, if any.

IPL will amend the Post-Closure Care Plan if there is a change in operation of the CCR unit that affects the written Post-Closure Care Plan or, if after post-closure activities have started, unexpected events cause a revision of the plan.

IPL will provide notification of completion of the post-closure care no later than 60 days following the completion of the 30-year post-closure care period. The notification will include certification by a qualified professional engineer verifying that post-closure care has been completed in accordance with the plan. The notification will be placed in the facility’s operating record and on the website.

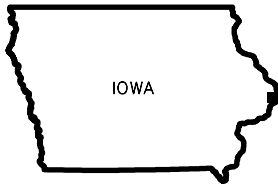
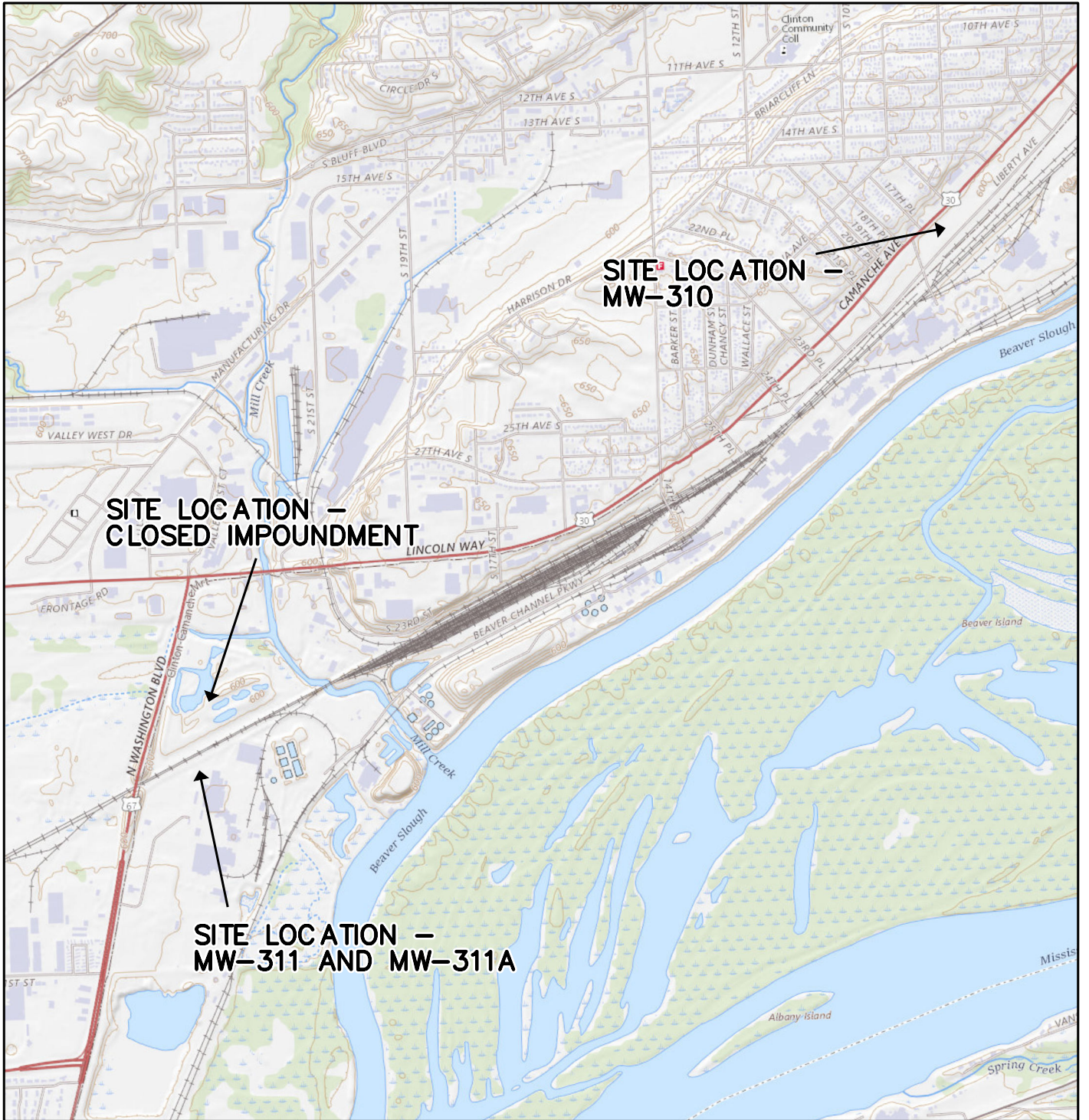
7.0 REFERENCES

Sargent & Lundy, L.L.C., 2018, Post-Closure Plan for Existing CCR Surface Impoundment, Interstate Power and Light Company M.L. Kapp Generating Station: Chicago, IL, January 23, 2018.

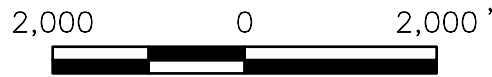
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Figures

- 1 Site Location Map
- 2 Site Plan and Monitoring Well Locations



USGS THE NATIONAL MAP
AUGUST 2021

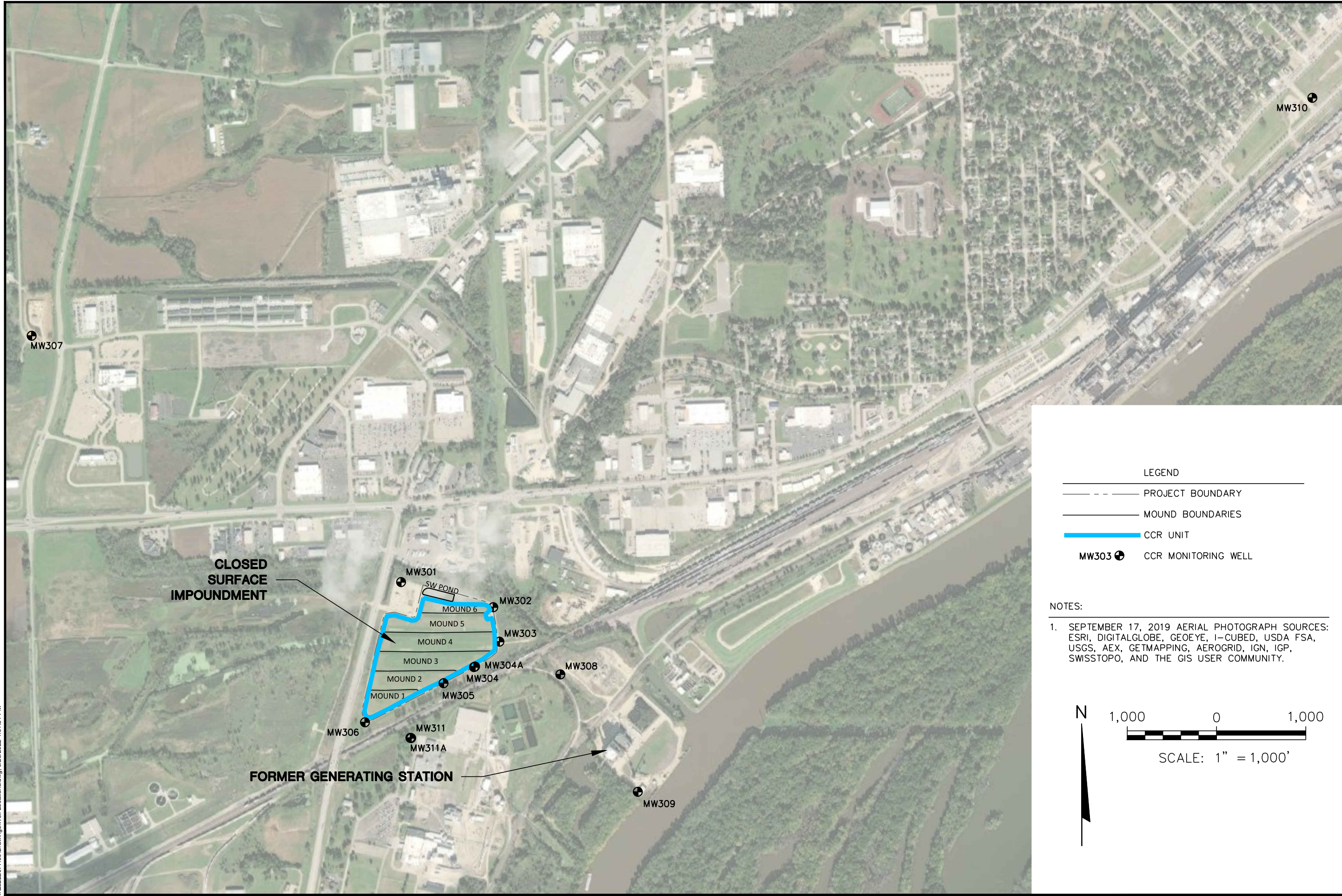


SCALE: 1" = 2,000'



CLIENT	ALLIANT ENERGY ML-KAPP GENERATING STATION 2001 BEAVER CHANNEL PKWY CLINTON, IA 52732	SITE	M.L. KAPP GENERATING STATION 3301 HIGHWAY 67 S CLINTON, IA 52732	SITE LOCATION MAP	
				PROJECT NO.	25220117.00
DRAWN:	02/08/2022	CHECKED BY:	MDB	1	
REVISED:	02/09/2022	APPROVED BY:	EJN 6/30/2022		

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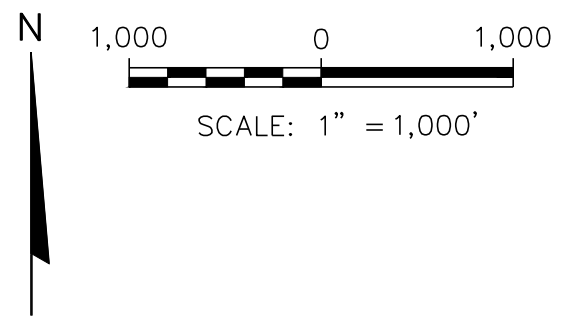


LEGEND

- PROJECT BOUNDARY
- MOUND BOUNDARIES
- █ CCR UNIT
- MW303 CCR MONITORING WELL

NOTES:

1. SEPTEMBER 17, 2019 AERIAL PHOTOGRAPH SOURCES: ESRI, DIGITALGLOBE, GEOEYE, I-CUBED, USDA FSA, USGS, AEX, GETMAPPING, AEROGRIID, IGN, IGP, SWISSTOPO, AND THE GIS USER COMMUNITY.



ALLIANT ENERGY M.L. KAPP GENERATING STATION 2001 BEAVER CHANNEL PKWY CLINTON, IA 52732	PROJECT NO. 25222077.00	DRAWN BY: KP/ZTW	M.L. KAPP GENERATING STATION 3301 HIGHWAY 67 S, CLINTON, IA 52732	SITE ENGINEER	SCS ENGINEERS 2830 DAIRY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830	FIGURE 2
	DRAWN: 09/04/2020	CHECKED BY: NK	3301 HIGHWAY 67 S, CLINTON, IA 52732	ENGINEER	SCS ENGINEERS 2830 DAIRY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830	FIGURE 2
REVISED: 06/29/2022	APPROVED BY:	EIJN 6/30/2022	3301 HIGHWAY 67 S, CLINTON, IA 52732	ENGINEER	SCS ENGINEERS 2830 DAIRY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830	FIGURE 2