

# Post-Closure Plan for Existing CCR Surface Impoundment

Prepared for Interstate Power and Light Company M.L. Kapp Generating Station Clinton, IA

Issue Date: January 23, 2018
Issue Purpose: For Use

Prepared by:

J. Fifarek

01/23/2018

Date

Reviewed by:

Packard

01/23/2018

Date

Approved by:

K. Mixer

01/23/2018

Date

Sargent & Lundy \*\*\*

Certification and Seal:



55 East Monroe Street Chicago, IL 60603-5780 USA

Project No. 13391-036

Report No. SL-014267 Revision: 0

**FINAL** 

Report No. SL-014267 Project No. 13391-009 Revision: 0 Page No. i

# **TABLE OF CONTENTS**

1.	INT	FRODUCTION & PURPOSE	1
2.	DES	SCRIPTION OF MONITORING / MAINTENANCE ACTIVITIES	2
	2.1	Mowing	2
	2.2	Visual Inspections by the Owner / Operator	
		Visual Inspection and Report by Certified Professional Engineer	
	2.4	Groundwater Monitoring	3
		NTACT INFORMATION FOR POST-CLOSURE CARE	
4.	PRO	OPERTY USE DURING POST-CLOSURE CARE PERIOD	3
		RTIFICATIONS	
		FERENCES	

# **LEGAL NOTICE**

This report ("Deliverable") was prepared by Sargent & Lundy, L.L.C. ("S&L"), expressly for the sole use of Alliant Energy ("Client") in accordance with the agreement between S&L and Client. This Deliverable was prepared using the degree of skill and care ordinarily exercised by engineers practicing under similar circumstances. Client acknowledges: (1) S&L prepared this Deliverable subject to the particular scope limitations, budgetary and time constraints, and business objectives of the Client; (2) information and data provided by others may not have been independently verified by S&L; and (3) the information and data contained in this Deliverable are time sensitive and changes in the data, applicable codes, standards, and acceptable engineering practices may invalidate the findings of this Deliverable. Any use or reliance upon this Deliverable by third parties shall be at their sole risk.

Report No. SL-014267 Project No. 13391-009 Revision: 0 Page No. 1

## 1. INTRODUCTION & PURPOSE

Interstate Power and Light Company (IPL) – a wholly owned subsidiary of Alliant Energy – operates the single 218 MW natural gas generating unit at M.L. Kapp Generating Station, located approximately 3 miles southwest of Clinton, Iowa. The Station's fuel source was converted from coal to natural gas in 2015, and closure of the facility's single coal combustion residual impoundment, the Main Ash Pond, is complete. To comply with the requirements of the US EPA Final CCR Rule (40 CFR 257.50 thru 257.107), Alliant Energy, on behalf of its subsidiary IPL, submits the following Post-Closure Plan detailing the steps to be undertaken during the required 30 year post-closure monitoring period in accordance with §257.104 of the CCR Rule.

This document provides the following required information:

- Description of the monitoring and maintenance activities,
- Contact information for inquiries about the closed CCR facility during the post-closure care period, and
- Description of the planned uses of the property during post-closure period.

Prior to the conversion to natural gas, the Station operated two small surface impoundments within the original footprint of the Main Ash Pond. The two ponds were identified as the Station's Primary Pond, and Secondary Pond. This Post-Closure Plan applies to the closure of the entire original footprint of the Main Ash Pond area. An annotated aerial photograph of the Station and Main Ash Pond area is shown in Figure 1.

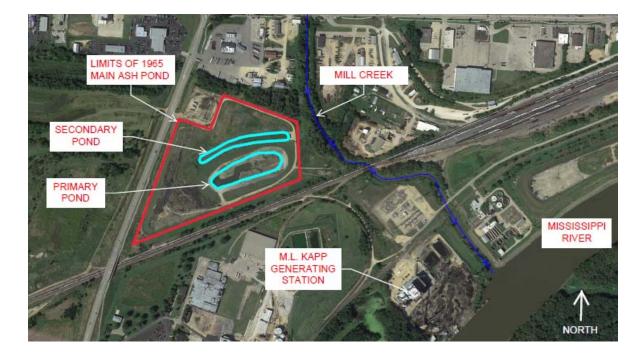


Figure 1: Main Ash Pond Area at the M.L. Kapp Generating Station Prior to Closure

Report No. SL-014267 Project No. 13391-009 Revision: 0 Page No. 2

# 2. DESCRIPTION OF MONITORING / MAINTENANCE ACTIVITIES

The following table outlines the maintenance and monitoring activities to be undertaken during the 30-year post-closure care period. The frequency of these activities is as mandated by the CCR Rule unless noted otherwise.

Monitoring and Maintenance Activities	Frequency
Mow Vegetation	Semi-annually (minimum)
Visual Inspection by Owner / Operator	Monthly (minimum)
Visual Inspection and Report by Licensed Professional Engineer	As necessary
Repair of Vegetative Cover	As necessary
Repair of Final Cover System	Following observance of settlement, subsidence, erosion, or other events
Inspect Groundwater Monitoring System	Monthly
Repair of Groundwater Monitoring System	Following observance of an issue
Monitor the Groundwater	Semi-Annually

# 2.1 Mowing

The Station will perform regular mowing of the final cover system vegetation during the growing season. Mowing will be performed on a semi-annual basis unless more frequent mowing is required to facilitate inspections during periods of higher vegetation growth.

# 2.2 Visual Inspections by the Owner / Operator

At a minimum, the Owner/Operator of the closed CCR unit shall visually inspect the closed impoundment on a monthly basis to identify any problem areas such as erosion, subsidence, settlement or other events. The monthly visual inspection will also include an inspection of the groundwater monitoring system to visually assess the condition of the protective casing and cover system. If problems are observed with the vegetative cover, actions will be taken to reseed the area and maintain the erosion protection provided by the vegetation. Furthermore, should the monthly inspection identify issues concerning the final cover system or the groundwater monitoring system, actions will be taken to make repairs in accordance with the original design.

# 2.3 Visual Inspection and Report by Certified Professional Engineer

Should the visual inspections by the Owner/Operator indicate potential concerns, a detailed inspection of the closed CCR surface impoundment will be performed by a licensed professional engineer. The professional engineer will visually inspect the surface and side slopes of the closed impoundment to identify any problem areas such as erosion, subsidence, settlement or other events.



Report No. SL-014267 Project No. 13391-009 Revision: 0 Page No. 3

# 2.4 Groundwater Monitoring

The Owner/Operator will maintain the groundwater monitoring system and monitor groundwater quality in accordance with the requirements of §257.90 through §257.98 of the CCR Rule. Groundwater monitoring will be performed on a semi-annual basis in accordance with §257.94(b) of the CCR Rule.

## 3. CONTACT INFORMATION FOR POST-CLOSURE CARE

As required by §257.104(d)(1)(ii) of the CCR Rule, the following contact information is provided if the need arises to discuss the contents or adequacy of this Post-Closure Plan with Station personnel:

M.L. Kapp Generating Station

Attn: Plant Manager

2001 Beaver Channel Parkway

Clinton, IA 52732

(563) 241-1502 Starting July 1, 2018, please contact (563) 241-1548.

CCRProgram@alliantenergy.com

## 4. PROPERTY USE DURING POST-CLOSURE CARE PERIOD

Per the requirements of §257.104(d)(1)(iii) of the CCR Rule, the intended use of the closed CCR facility at M. L. Kapp – as of the issue date of this Plan – is to remain a natural, undisturbed vegetated area.

#### 5. CERTIFICATIONS

It is S&L's opinion that this written Post-Closure Plan meets the requirements of §257.104(d)(4).

#### 6. REFERENCES

1. 40 CFR Part 257, Subpart D – Environmental Protection Agency Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, Federal Register, Vol. 80, No. 74, Aug. 5, 2016.

Note: The M.L. Kapp Generating Station is retired as of June 1, 2018. The contact information has been updated accordingly. This administrative change does not substantially affect the written post-closure plan that was certified by a Professional Engineer on January 23, 2018.