August 10, 2021
File No. 25221077.00

Mr. Brad Weber
Alliant Energy
201 N. 2nd Street
Clinton, IA 52732

Subject: Groundwater Monitoring System Certification Update
M.L. Kapp Generating Station, Clinton, Iowa

Dear Mr. Weber:

This groundwater monitoring system certification update was prepared to document and certify a change in the groundwater monitoring system at the former M.L. Kapp Generating Station (KAP). The KAP groundwater monitoring system was originally certified to be designed and constructed to meet the requirements of 40 CFR 257.91 on April 17, 2019. This update to the certification reflects the addition of new upgradient background monitoring well MW-307 and the designation of well MW-306 as a compliance well rather than a background well.

The KAP groundwater monitoring system is designed and constructed to meet the requirements of 40 CFR 257.91. The groundwater monitoring network at the former M.L. Kapp Generating Station is monitoring the Main Ash Pond, a coal combustion residual (CCR) surface impoundment closed in January 2018.

The monitoring network was designed and constructed to represent the quality of background groundwater that has not been affected by leakage from the coal combustion residual (CCR) unit and the quality of groundwater passing the waste boundary of the CCR unit.

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 original groundwater monitoring system consisted of one upgradient (MW-306) and five downgradient (MW-301 through MW-305) monitoring wells, which exceeds the minimum requirements of 40 CFR 257.91(c)(1).

Following certification of the original monitoring system, the following wells were added to the monitoring system:

- One upgradient well (MW-307)

The additional upgradient monitoring well (MW-307) was installed because the analytical results to date for the on-site upgradient well (MW-306) suggested that this well may not represent natural background groundwater conditions at the site. Well MW-307 also provides additional information on groundwater flow direction in the site vicinity. The new upgradient monitoring well replaces

monitoring well MW-306 as the background monitoring well for the site. Monitoring well MW-306 will be evaluated as a compliance well going forward.

Based on the installation documentation 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).

PE Certification

I, Eric J. Nelson, hereby certify that that the groundwater monitoring system at the former M.L. Kapp 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 hereby certify that this engineering document was prepared by me or under my direct personal supervision and that I am a duly licensed Professional Engineer under the laws of the State of Iowa.

8/10/2021

(signature) (date)

Eric J. Nelson

(printed or typed name)

License number 23136

My license renewal date is December 31, 2022.

Pages or sheets covered by this seal:
All pages

Groundwater Monitoring System Certification Update

Sincerely,

Eric J. Nelson, PE
Project Director
SCS Engineers

Thomas J. Karwoski
Senior Project Manager
SCS Engineers

MDB/lmh_jsn/TK/SCC/EJN

cc: Jessica Wilkening, Alliant Energy

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