

# Semiannual Progress Report Selection of Remedy – M.L. Kapp Generating Station

M.L. Kapp Generating Station  
Clinton, Iowa

Prepared for:

Alliant Energy



**SCS ENGINEERS**

25221050.00 | March 13, 2026

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## 1.0 INTRODUCTION AND PURPOSE

The Semiannual Progress Report for remedy selection at the Interstate Power and Light Company (IPL) former M.L. Kapp Generating Station (KAP) was prepared to comply with U.S. Environmental Protection Agency (U.S. EPA) regulations regarding the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities [40 CFR 257.50-107], or the “CCR Rule” (Rule). Specifically, the selection of remedy process was initiated to fulfill the requirements of 40 CFR 257.97.

### 1.1 BACKGROUND

The KAP Main Ash Pond CCR unit is a closed inactive surface impoundment. The KAP Main Ash Pond was closed and capped in 2017. A Notification of Completion of Closure pursuant to 40 CFR 257.102(d) was issued by Alliant Energy on January 17, 2018. The KAP generating station was decommissioned and then demolished in 2020.

Molybdenum was first identified above the groundwater protection standard (GPS) and as a statistically significant increase (SSI) in well MW-303 during the December 2019 sampling event but was not confirmed as a statistically significant level (SSL) during the following February and April 2020 events. However, molybdenum was confirmed to be an SSL above the GPS in MW-302, MW-304 and MW-305 for the October 2020 event. Molybdenum continues to be an SSL above the GPS in monitoring wells MW-301, MW-302, MW-303, MW-304, and MW-305. Post-closure groundwater monitoring concentrations of molybdenum were found at a statistically significant level (SSL) above the GPS in groundwater samples from downgradient monitoring wells MW-302, MW-304, and MW-305. In response, the Assessment of Corrective Measures (ACM) for the closed and capped Main Ash Pond was completed on March 11, 2021.

Lithium was first identified as an SSL in well MW-306 above the GPS during the April 2021 sampling event. This was the first time that lithium was detected above the GPS. Lithium exceeded the GPS during the April 2021 monitoring event in MW-303 and MW-306. Lithium remains as an SSL above the GPS in MW-306.

Arsenic exceeded the GPS in well MW-304 on the April 2020 event after being detected below the GPS in the December 2019 and February 2020 sampling events. MW-304 was resampled in July 2020 but was not confirmed as GPS exceedance. Arsenic was later confirmed as an SSL above the GPS in MW-303 during the November 2022 event.

This Semiannual Progress Report summarizes data collected and remedy evaluation progress made since the ACM was completed in March 2021, and outlines planned future activities to complete the selection of remedy process. This semiannual progress report covers the 6-month period of September 2025 through February 2026.

### 1.2 SITE INFORMATION AND MAPS

The former KAP Generating Station is located along the west bank of the Mississippi River, in the city of Clinton, in Clinton County, Iowa (**Figure 1**). The KAP Main Ash Pond is located to the northwest of the former generating station at 3301 E. Highway 67 S, Clinton, Iowa.

The groundwater monitoring system for the KAP monitors a single CCR unit:

- Kapp Main Ash Pond (inactive surface impoundment – closed January 2018).

The system is designed to detect monitored constituents at the waste boundary of the KAP CCR unit as required by 40 CFR 257.91(d). As of February 2023, the groundwater monitoring system consists of 1 upgradient background well (MW-307), 6 downgradient compliance wells at the waste boundary (MW-301, MW-302, MW-303, MW-304, MW-305, and MW-306), 8 downgradient delineation wells (MW-304A, MW-308, MW-309, MW-311, MW-311A, MW-313, MW-314, and MW-314A), and 2 sidegradient supplemental background wells (MW-310 and MW-312) (**Figure 2**).

Groundwater flow at the site is variable but generally to the southeast, and water levels fluctuate seasonally due to the proximity to the nearby creek and the Mississippi River. Depth to groundwater, as measured in the site monitoring wells, varies from approximately 3 to 22 feet below ground surface due to topographic variation across the facility and seasonal variations in water levels.

## 2.0 SUMMARY OF WORK COMPLETED

Work completed to support remedy selection for the KAP Main Ash Pond is summarized in **Table 1**. Activities completed within the 6-month period covered by this semiannual report are discussed in more detail below.

### 2.1 MONITORING NETWORK CHANGES

No changes were made to the certified groundwater monitoring system during the reporting period of this semiannual selection of remedy (SOR) update. Monitoring well locations are shown on **Figure 2**.

### 2.2 GROUNDWATER MONITORING

A semiannual groundwater sampling event was conducted on November 10-12, 2025. The November monitoring event was part of the routine semiannual assessment monitoring program. The wells sampled included the wells in the original monitoring program (MW-301 through MW-306); delineation wells MW-304A, MW-308, MW-309, MW-311, MW-311A, MW-313, MW-314, and MW-314A; and background monitoring well MW-307.

A summary of groundwater samples collected since submittal of the ACM is provided in **Table 2**.

### 2.3 STATISTICAL EVALUATION

Statistical evaluation of the November 2025 semiannual sampling results during the period covered by this update will be reported in the Assessment Groundwater Monitoring Results letter (due March 13, 2026). The results will be included in the 2026 Annual Groundwater Monitoring and Corrective Action Report due on August 1, 2026.

The results of the statistical evaluation of the November 2025 sampling event indicate that multiple compliance wells (MW-301, MW-302, MW-303, MW-304, and MW-305) had molybdenum concentrations at SSLs above the GPS, consistent with previous results.

MW-306 had a lithium result at an SSL above the GPS, consistent with previous SSLs at this well.

Arsenic was not identified as having an SSL above the GPS in MW-303 for the November 2025 event. Arsenic at MW-303 was previously identified at an SSL in the May 2023 and November 2022 events but was not identified as at an SSL in October 2023, April 2024, October 2024 or May 2025 events.

A GPS exceedance was observed for total radium in May 2025, but not at an SSL and there have not been subsequent detections above the GPS.

There were no SSLs above the GPS for the delineation wells identified for the November 2025 event.

Delineation wells MW-314 and MW-314A were installed in February 2024 and will be included in the lower confidence limit (LCL) evaluation when the minimum number of sampling events is completed.

## **2.4 EVALUATION OF CORRECTIVE MEASURE ALTERNATIVES**

A qualitative assessment of potential Corrective Measure Alternatives using the selection criteria in 40 CFR 257.97(b) and (c) was provided in the March 2021 ACM.

IPL evaluated groundwater extraction and treatment options for arsenic, molybdenum, and lithium. Aquifer pumping tests data indicate that the aquifer has a low hydraulic conductivity that will limit the capture zones of a vertical extraction well system, so horizontal collection methods were evaluated as an alternative means of groundwater extraction.

During this reporting period, preliminary design work for a horizontal groundwater collection trench and treatment system included: preparation of conceptual design layouts; identification of a horizontal collector model for evaluation of flow and capture zone based on existing hydraulic conductivity information; evaluate the trench layout, horizontal well layout, depth, access and utilities with a subcontractors; finalized geological cross-sections for subcontractor review; and obtain additional utility information related to a natural gas ‘substation’ for horizontal drilling access assessment.

An addendum to the ACM was completed on January 22, 2026, related groundwater extraction and treatment in low hydraulic conductivity conditions. A Selection of Remedy Report will be issued using the selection criteria in 40 CFR 257.97(b) and (c) after updates to the conceptual site model, delineation of the nature and extent of impacts, and collection of additional data relevant to remedy selection are completed.

## **3.0 PLANNED ACTIVITIES**

Planned activities related to the remedy selection process include the following:

- Continue semiannual assessment monitoring.
- Continue to evaluate treatment options for molybdenum, lithium, and arsenic.
- Continue preliminary design of a horizontal groundwater collection trench and treatment system based on a horizontal collector model and evaluate flow and capture to support eventual selection of remedy.
- Collect surface water and sediments sampling in adjacent areas to support delineation of GPS exceedances.
- Update the conceptual site model based on findings of nature and extent of investigation.
- Hold a public meeting in accordance with 40 CFR 257.96(e) prior to issuing a Selection of Remedy.

- Draft a Selection of Remedy Report in accordance with 40 CFR 257.97 based on evaluations and preliminary designs for a groundwater collection trench and treatment system.

## Tables

- 1 Timeline for Completed Work – Selection of Remedy
- 2 CCR Rule Groundwater Sample Summary

**Table 1. Timeline for Completed Work - Selection of Remedy  
M. L. Kapp Generating Station / SCS Engineers Project #25221050.00**

Date	Activity
<b>Activities Completed During Previous Semiannual Reporting Periods</b>	
April 2020	Background monitoring well installed to provide additional information on groundwater flow direction in the site vicinity and to provide natural background groundwater conditions.
April 2020	Conduct Semiannual assessment monitoring event.
July - August 2020	Conducted assessment monitoring event for background monitoring well and resampling event for select parameters.
October 2020	Conduct Semiannual assessment monitoring event.
November 2020 - September 2021	Negotiated access agreement for future off-site, downgradient monitoring well nest on an off-site property.
February 2021	Installed additional piezometer MW-304A to investigate vertical gradient flow and groundwater quality.
February 2021	Conducted a supplemental groundwater sampling event of assessment well MW-304A and new background monitoring well MW-307.
March 2021	Completed Assessment of Corrective Measures (ACM).
April 2021	Installed off-site monitoring wells MW-308 and MW-309 to investigate downgradient groundwater flow and quality.
May 2021	Completed the well documentation report for piezometer MW-304A.
May - August 2021	Evaluated future Alliant Clinton-Perrin Substation property as a location for a future off-site bedrock monitoring well location.
June 2021	Conducted a supplemental groundwater sampling event for the two newly installed monitoring wells (MW-308 and MW-309) and the new background monitoring well (MW-307).
June 2021	Completed statistical evaluation and results letter for February 2021 groundwater monitoring event.
June 2021	Completed the 2020 Annual Groundwater Monitoring and Corrective Action Report.
July 2021	Completed the well documentation report for monitoring wells MW-308 and MW-309.
July 2021	Conducted a supplemental groundwater sampling event for the new background monitoring well MW-307.
August 2021	Completed Statistical Evaluation and result letter for the April 2021 groundwater monitoring event.
August 2021	Completed groundwater monitoring system certification update.
September 2021	Completed Semiannual Progress Report for the Selection of Remedy.
September 2021	Installed off-site monitoring well MW-310 to investigate upgradient groundwater flow and quality.
October 2021	Conducted an initial groundwater sampling event for the new background monitoring well, MW-310. Complete the semiannual groundwater assessment monitoring event for all wells.

**Table 1. Timeline for Completed Work - Selection of Remedy  
M. L. Kapp Generating Station / SCS Engineers Project #25221050.00**

Date	Activity
November 2021	Performed property boundary survey at the American Water off-site property to confirm the proper location of proposed monitoring wells MW-311 and MW-311A.
December 2021	Installed off-site and downgradient monitoring wells MW-311 and MW-311A to investigate downgradient groundwater flow and quality.
December 2021	Conducted an initial groundwater sampling event for the new monitoring wells, MW-311 and MW-311A.
January 2022 - February 2022	Prepared the 2021 Annual Groundwater Monitoring and Corrective Action Report.
January 2022	Performed hydraulic conductivity tests on monitoring wells MW-307, MW-308, MW-311, and MW-311A.
January 2022	Provided additional information to the Iowa Department of Transportation related to the right-of-way permit application for a proposed monitoring well installation to be located southwest of the site and adjacent to Highway 67.
February 2022	Iowa Department of Transportation approved right-of-way permit for proposed monitoring well along Highway 67 to provide additional nature and extent information.
February 2022	Prepared bedrock contour map needed to select location for potential additional background bedrock monitoring well.
February 2022	Measured groundwater elevations at all on-site and off-site monitoring wells for additional groundwater elevation and flow mapping.
February 2022	Conducted additional sampling event at monitoring wells MW-310, MW-311, and MW-311A.
March 2022	Completed Semiannual Progress Report for the Selection of Remedy.
March 2022	Completed the well documentation report for monitoring wells MW-310, MW-311, and MW-311A.
April 2022	Completed the semiannual groundwater assessment monitoring event for all wells.
April 2022	Completed statistical evaluation and result letter for the December 2021 groundwater monitoring event.
May 2022	Contacted two downgradient off-site property owners again requesting access agreements to install delineation monitoring wells on their properties.
June 2022	Completed statistical evaluation and result letter for the February 2022 groundwater monitoring event.
June 2022	Contacted two downgradient off-site property owners again requesting access agreements to install delineation monitoring wells on their properties.
July 2022	Completed the 2021 Annual Groundwater Monitoring and Corrective Action Report.
July 2022	Evaluated treatment alternatives for molybdenum and lithium impacted groundwater.
July 2022	Contacted two downgradient off-site property owners again requesting access agreements to install delineation monitoring wells on their properties.
August 2022	Completed statistical evaluation and result letter for the April 2021 groundwater monitoring event.
August 2022	Contacted downgradient off-site property owners, Clysar and Vertex Chemical again requesting access agreements to install delineation monitoring wells on their properties.

**Table 1. Timeline for Completed Work - Selection of Remedy  
M. L. Kapp Generating Station / SCS Engineers Project #25221050.00**

Date	Activity
August 2022	Conducted additional sampling event at monitoring wells MW-311 and MW-311A along with site-wide water level measurements.
August 2022	Received a signed access agreement from the City of Clinton to install a background monitoring well on the City of Clinton regional wastewater reclamation facility (RWRF) property.
September 2022	Completed Semiannual Progress Report for the Selection of Remedy.
September 2022 - February 2023	Monthly correspondence and negotiations with off-site property owners to obtain an access agreement for the installation of delineation wells on their property.
September 2022 - February 2023	Corresponded with the City of Clinton regional wastewater reclamation facility (RWRF) staff to identify an exact location for the supplemental background bedrock monitoring well and to coordinate utility locate and drilling logistics.
September 2022	Received drilling bid for the installation of a background monitoring well on the City of Clinton regional water reclamation facility (RWRF) property.
November 2022	Completed the semiannual groundwater assessment monitoring event for all wells.
November 2022	Requested and received extension of the Iowa Department of Transportation permit to install a monitoring well within a state right-of-way.
November 2022	Completed screening of planned monitoring well locations at RWRF site and in right-of-way for utility conflicts.
December 2022	Notified by the driller that, due to several drillers with COVID, the December 2022 drilling date needs to be rescheduled to January 2023.
December 2022	Notified by the driller that, due to work delays related to severe winter weather, the January 20th drilling date needs to be rescheduled to February 6th.
December 2022	Completed lower confidence interval evaluation and results letter for the August 2022 groundwater monitoring event.
January 2023	Formal proposal submitted to Hawkins, Inc., owner of Vertex Chemical Corporation adjacent to KAP impoundment for the installation of a delineation monitoring well nest on their property.
January 2023	Notified by driller that the February 6th well installation start date for the WWTP well and Highway 67 ROW well must again be postponed due to bad weather causing schedule backups. Contracted with a new driller to install the supplemental background well and Hwy 67 delineation well during February 2023.
January 2023	Requested and received approval from the Iowa Department of Transportation to relocate the planned Highway 67 right-of-way well to the opposite side a walking path to avoid conflict with an underground gas line.
January 2023 - February 2023	Prepared the draft 2022 Annual Groundwater Monitoring and Corrective Action Report.
January 2023 - February 2023	Evaluated potential locations on the M.L. Kapp closed impoundments property for the installation of additional delineation wells.
February 2023	Installed and developed supplemental background bedrock well MW-312 on the City of Clinton RWRF property.
February 2023	Installed and developed delineation well MW-313 in the Highway 67 ROW.

**Table 1. Timeline for Completed Work - Selection of Remedy  
M. L. Kapp Generating Station / SCS Engineers Project #25221050.00**

Date	Activity
March 2023	Surveyed wells installed in Highway 67 ROW. Soil samples from MW-312 and MW-313 sent to the laboratory for analysis and passed TCLP. Ordered pumps for installation for initial sampling event. Performed reconnaissance of potential well locations on Alliant property north of the railroad line, with intent to survey railroad property line and mark water utilities.
March 2023	Completed lower confidence interval evaluation and results letter for the November 2022 groundwater monitoring event.
March 2023	Completed the Semiannual Progress Report for the Selection of Remedy.
April 2023	Hydraulic conductivity testing, surveying, and initial sample collection completed on newly installed monitoring wells MW-312 and MW-313.
April 2023	Railroad property line south of the closed impoundment surveyed. Localized flooding impeded full evaluation of potential monitoring well installation locations.
May 2023	Completed the semiannual groundwater assessment monitoring event for all wells.
June 2023	Met with Hawkins, Inc. (referred to as Vertex in prior submittals) personnel to negotiate property access for potential well installation.
July 2023	Monitoring Well Construction Report submitted for MW-312 and MW-313.
July 2023	Future well location determined during site visit on Hawkins property.
August 2023	Sent revised Access Agreement to Hawkins reflecting agreed upon well location as identified during site visit.
August 2023	Submitted 2022 Annual Groundwater Monitoring and Corrective Action Report.
September 2023	Submitted the Assessment Groundwater Monitoring Results letter for the May 2023 event.
September 2023	Completed the Semiannual Progress Report for the Selection of Remedy.
October 2023	Conducted a semiannual groundwater sampling event.
October 2023	Access obtained for installation of off-site monitoring well nest on Hawkins, Inc. property (previously referred to as the Vertex Chemical property).
January 2024	Submitted a notification of proposed drilling and cap repair activities to the Iowa Department of Natural Resources.
January - February 2024	Prepared and submitted well permit and floodplain permit applications.
February 2024	Drilled 4 soil borings through CCR material within the closure area. Ash cores were collected from the base of the impoundment.
February 2024	Submitted ash cores to an analytical laboratory (ReSolution Partners) for long term leach testing. Collected groundwater samples for use in laboratory leach testing on ash core samples.
February 2024	Conducted aquifer stepped pumping tests at existing monitoring wells. Began pumping test data analysis.
February 2024	Installed downgradient delineation well nest on off-site property and developed these monitoring wells (MW-314 and MW-314A).
March 2024	Submitted March 2024 Semiannual Corrective Action Report for reporting period September 2023 through February 2024.

**Table 1. Timeline for Completed Work - Selection of Remedy  
M. L. Kapp Generating Station / SCS Engineers Project #25221050.00**

Date	Activity
March 2024	Received analytical results from laboratory (Eurofins) for samples collected during aquifer pumping test.
March 2024	Completed the Semiannual Progress Report for the Selection of Remedy.
March 2024	Submitted the Assessment Groundwater Monitoring letter for the October 2023 sampling event.
March 2024	Conducted hydraulic conductivity testing, pump installation, and survey of newly installed wells MW-314 and MW-314A and CCR borings.
April 2024	Received a pre-trial evaluation summary of CCR sequential leaching test results and next phase sequential extractions from the laboratory (ReSolution Partners). This summary includes the preliminary results for an 8-hour, 24-hour and 48-hour leach extraction using a upgradient groundwater sample on the CCR sample materials. The 48-hour leach extraction timeframe was selected from these preliminary results for further leach extraction testing trials.
April - May 2024	Conducted a semiannual groundwater sampling event.
May 2024	Drafted a Memo of pumping test results for step tests at MW-301, MW-302, MW-303, MW-305, and MW-314A and capture zone analysis.
June 2024	Received draft working copies of preliminary results and final results for the sequential leaching tests completed using the CCR material samples from the laboratory (ReSolution Partners).
June - July 2024	Developed updated cross-sections that include CCR soil boring information.
July 2024	Submitted of Monitoring Well Construction Documentation report for MW-314 and MW-314A.
July 2024	Completed the 2023 Annual CCR Groundwater Report.
July - August 2024	Evaluated results of the sequential leaching testing using a geochemical modeling software (Phreeqc software).
August 2024	Drafted a evaluation and results Memo of the sequential leaching tests with support from geochemical modeling and updated cross-sections for the selection of remedy evaluation.
August 2024	Drafted a revised Memo for the Pumping Test Evaluation and capture zone analysis in support of selection of remedy.
September 2024	Submitted September 2024 Semiannual Corrective Action SOR Report for reporting period March 2024 through August 2024.
September 2024	Submitted a letter of Assessment Groundwater Monitoring Results for the April 2024 sampling event.
September 2024	Finalized the Semiannual Selection of Remedy Progress Report.
October 2024	Conducted a semiannual groundwater sampling event.
November 2024	Submitted a final Cap Disturbance Documentation Report.
February 2025	Revised the aquifer pumping test memo.

**Table 1. Timeline for Completed Work - Selection of Remedy  
M. L. Kapp Generating Station / SCS Engineers Project #25221050.00**

Date	Activity
February 2025	Revised the leach test memo.
April 2025	Finalized the Assessment Groundwater Monitoring Results for October 2024.
March 2025	Submitted a Semi-Annual SOR Progress Report.
May 2025	Conducted the semi-annual groundwater sampling event. New GPS exceedance for total radium at MW-302.
May - August 2025	Evaluated horizontal collection trenching and horizontal extraction wells as an option for removal of groundwater for treatment around the perimeter of the closed impoundments. - Identified a suitable model for assessing horizontal groundwater collection and began model setup. - Developed conceptual layouts for three preliminary groundwater collection systems to support validation conversations with vendors. - Initiated/conducted vendor conversations regarding collection system concepts, constructability, site access, working area requirements, and utility conflicts.
July 2025	Visual survey of points along the potential trench locations for preliminary design work for a potential groundwater collection trench.
August 2025	Submitted the 2024 Annual CCR Groundwater Report.
September 2025	Submitted the May 2025 Assessment Groundwater Monitoring Results Letter.
<b>Activities Completed During Current Semiannual Reporting Period</b>	
September 2025	Submitted a Semi-Annual SOR Progress Report.
September - December 2025	Evaluated onsite/adjacent utilities with respect to potential remedial system layout for groundwater collection.
September - December 2025	Evaluated a groundwater capture zone analysis model for potential remedial configuration.
October 2025	Evaluation of monitored natural attenuation (MNA) analytical data for ACM Addendum No. 1.
September - November 2025	Updated project drawings and geology cross-sections for ACM evaluation of remedial options.
September 2025 - February 2026	Ongoing evaluation and validation of preliminary remedial design work for horizontal groundwater collection and treatment system.
November 2025	Conducted a semiannual groundwater sampling event.
January 2026	Finalized an Addendum No. 1 to the Assessment of Corrective Measures for the Closed Surface Impoundment.
January - February 2026	Modeling evaluation of groundwater capture from horizontal groundwater collection devices.

Last revision by: NLB Date: 2/26/2026  
 Checked by: TK Date: 2/26/2026

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**Table 2. Groundwater Sample Summary**  
**M.L. Kapp Generating Station / SCS Engineers Project #25221050.00**

Sample Dates	Compliance Wells						Delineation Wells									Background Well	Supplemental Background Wells	
	MW-301	MW-302	MW-303	MW-304	MW-305	MW-306	MW-304A	MW-308	MW-309	MW-311	MW-311A	MW-313	MW-314	MW-314A	MW-307		MW-310	MW-312
4/5/2021	A	A	A	A	A	A	A-NE	NI	NI	NI	NI	NI	NI	NI	A	NI	NI	
6/17/2021	--	--	--	--	--	--	--	A-NE	A-NE	NI	NI	NI	NI	NI	A	NI	NI	
7/22/2021	--	--	--	--	--	--	--	--	--	NI	NI	NI	NI	NI	A	NI	NI	
10/5/2021	--	--	--	--	--	--	--	--	--	NI	NI	NI	NI	NI	--	A	NI	
10/18-19/2021	A	A	A	A	A	A	A-NE	A-NE	A-NE	NI	NI	NI	NI	NI	A	A	NI	
12/29/2021	--	--	--	--	--	--	--	--	--	A-NE	A-NE	NI	NI	NI	--	--	NI	
2/21/2022	--	--	--	--	--	--	--	--	--	A-NE	A-NE	NI	NI	NI	--	A	NI	
4/18-19/2022	A	A	A	A	A	A	A-NE	A-NE	A-NE	A-NE	A-NE	NI	NI	NI	A	A	NI	
8/22/2022	--	--	--	--	--	--	--	--	--	Add.	Add.	NI	NI	NI	--	--	NI	
11/1-3/2022	A	A	A	A	A	A	A-NE	A-NE	A-NE	A-NE	A-NE	NI	NI	NI	A	A	NI	
5/1-4/2023	A	A	A	A	A	A	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	NI	NI	A	A	A	
10/24-26/2023	A	A	A	A	A	A	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	NI	NI	A	A	A	
4/30-5/2/2024	A	A	A	A	A	A	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A	A	A	
10/28-31/2024	A	A	A	A	A	A	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A	A	A	
5/5-7/2025	A	A	A	A	A	A	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A	--	--	
11/10-12/2025	A	A	A	A	A	A	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A-NE	A	--	--	
Total Samples	10	10	10	10	10	10	10	10	10	11	11	6	4	4	12	9	4	

Abbreviations:

A = Assessment Monitoring Program      NI = Not Installed      Add. = Additional Sampling Event

-- = Not Applicable

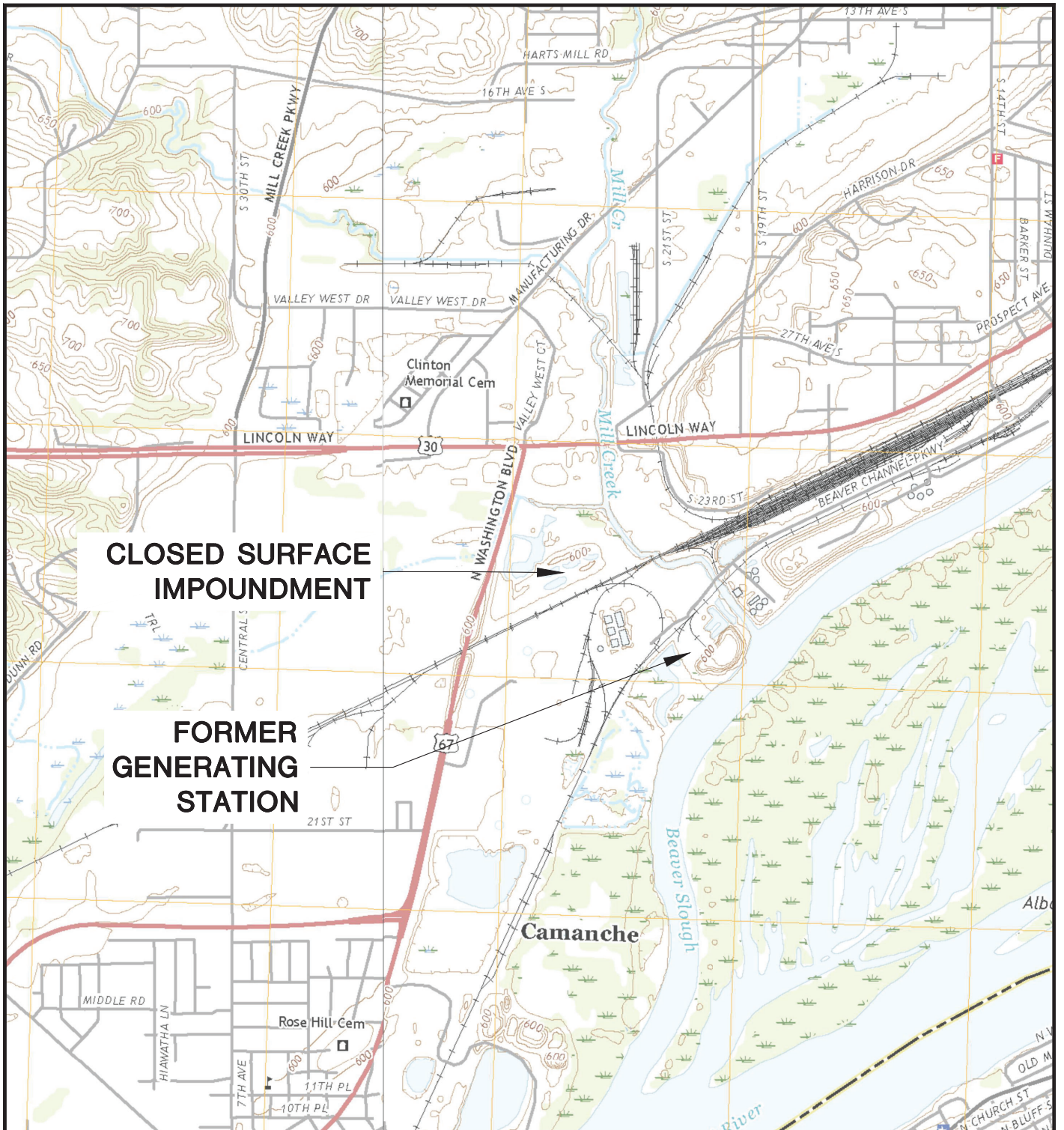
A-NE - Assessment monitoring for nature and extent, well sampled for select Appendix IV and selection-of-remedy parameters

Note - MW-310 and MW-312 are measured for depth to water and total well depth only.

Last revision by: NLB      Date: 2/3/2026  
 Checked by: TK      Date: 2/26/2026

## Figures

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



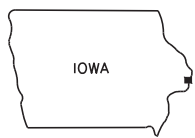
**CLOSED SURFACE  
IMPOUNDMENT**

**FORMER  
GENERATING  
STATION**

**Camanche**



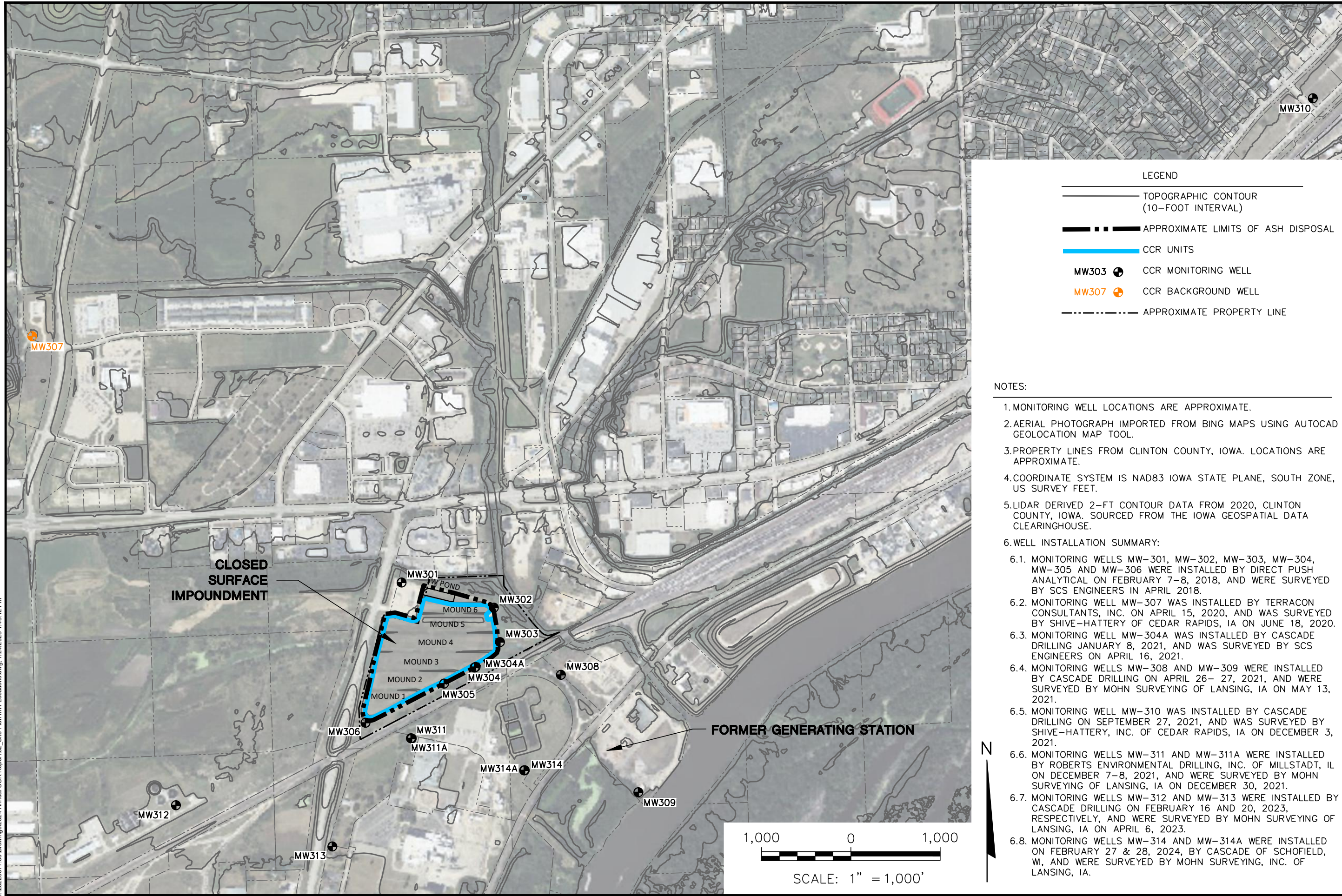
CLINTON QUADRANGLE  
IOWA-ILLINOIS  
7.5 MINUTE SERIES (TOPOGRAPHIC)  
2018  
SCALE: 1" = 2,000'



CLIENT	ALLIANT ENERGY 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.	25220077.00		DRAWN BY:	BSS	
DRAWN:	11/20/2019	CHECKED BY:	NDK	FIGURE		
REVISED:	09/04/2020	APPROVED BY:	TK, 3/10/2023		1	

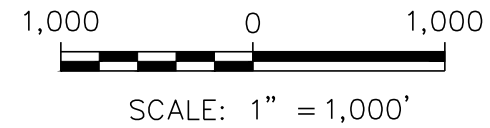
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I:\2525077\00\Drawings\2024 Annual CCR Report\02\_Site Plan MW Locations.dwg, 7/24/2025 1:43:12 PM



- LEGEND**
- TOPOGRAPHIC CONTOUR (10-FOOT INTERVAL)
  - APPROXIMATE LIMITS OF ASH DISPOSAL
  - CCR UNITS
  - MW303 CCR MONITORING WELL
  - MW307 CCR BACKGROUND WELL
  - APPROXIMATE PROPERTY LINE

- NOTES:**
- MONITORING WELL LOCATIONS ARE APPROXIMATE.
  - AERIAL PHOTOGRAPH IMPORTED FROM BING MAPS USING AUTOCAD GEOLOCATION MAP TOOL.
  - PROPERTY LINES FROM CLINTON COUNTY, IOWA. LOCATIONS ARE APPROXIMATE.
  - COORDINATE SYSTEM IS NAD83 IOWA STATE PLANE, SOUTH ZONE, US SURVEY FEET.
  - LIDAR DERIVED 2-FT CONTOUR DATA FROM 2020, CLINTON COUNTY, IOWA. SOURCED FROM THE IOWA GEOSPATIAL DATA CLEARINGHOUSE.
  - WELL INSTALLATION SUMMARY:
    - MONITORING WELLS MW-301, MW-302, MW-303, MW-304, MW-305 AND MW-306 WERE INSTALLED BY DIRECT PUSH ANALYTICAL ON FEBRUARY 7-8, 2018, AND WERE SURVEYED BY SCS ENGINEERS IN APRIL 2018.
    - MONITORING WELL MW-307 WAS INSTALLED BY TERRACON CONSULTANTS, INC. ON APRIL 15, 2020, AND WAS SURVEYED BY SHIVE-HATTERY OF CEDAR RAPIDS, IA ON JUNE 18, 2020.
    - MONITORING WELL MW-304A WAS INSTALLED BY CASCADE DRILLING JANUARY 8, 2021, AND WAS SURVEYED BY SCS ENGINEERS ON APRIL 16, 2021.
    - MONITORING WELLS MW-308 AND MW-309 WERE INSTALLED BY CASCADE DRILLING ON APRIL 26- 27, 2021, AND WERE SURVEYED BY MOHN SURVEYING OF LANSING, IA ON MAY 13, 2021.
    - MONITORING WELL MW-310 WAS INSTALLED BY CASCADE DRILLING ON SEPTEMBER 27, 2021, AND WAS SURVEYED BY SHIVE-HATTERY, INC. OF CEDAR RAPIDS, IA ON DECEMBER 3, 2021.
    - MONITORING WELLS MW-311 AND MW-311A WERE INSTALLED BY ROBERTS ENVIRONMENTAL DRILLING, INC. OF MILLSTADT, IL ON DECEMBER 7-8, 2021, AND WERE SURVEYED BY MOHN SURVEYING OF LANSING, IA ON DECEMBER 30, 2021.
    - MONITORING WELLS MW-312 AND MW-313 WERE INSTALLED BY CASCADE DRILLING ON FEBRUARY 16 AND 20, 2023, RESPECTIVELY, AND WERE SURVEYED BY MOHN SURVEYING OF LANSING, IA ON APRIL 6, 2023.
    - MONITORING WELLS MW-314 AND MW-314A WERE INSTALLED ON FEBRUARY 27 & 28, 2024, BY CASCADE OF SCHOFIELD, WI, AND WERE SURVEYED BY MOHN SURVEYING, INC. OF LANSING, IA.



CLIENT	ALLIANT ENERGY ML-KAPP GENERATING STATION 2001 BEAVER CHANNEL PKWY CLINTON, IA 52732	PROJECT NO. 25225077.00	DRAWN: 06/04/2025	REVISD: 07/24/2025	ENGINEER	FIGURE
						2
M.L. KAPP GENERATING STATION 3301 HIGHWAY 67 S, CLINTON, IA 52732		DRAWN BY: SB		CHECKED BY: TK		SCS ENGINEERS 2830 DAIRY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830
SITE		APPROVED BY: TK		TK 08/01/2025		
M.L. KAPP GENERATING STATION 3301 HIGHWAY 67 S, CLINTON, IA 52732						SITE PLAN AND MONITORING WELL LOCATIONS