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January 31, 2018

To: CCR Operating Record

Re: Notification of Completion of Closure pursuant to 40 CFR 257.102(d)

Closure of the existing Coal Combustion Residuals (CCR) Surface Impoundment at the Nelson Dewey Generating Station was completed on January 31, 2018. Closure was completed by leaving the CCR in place and installing a final cover system, in accordance with 40 CFR 257.102(d). This notification and the attached written certification from a qualified professional engineer have been prepared in accordance with 40 CFR 257.102(h) and 257.105(i)(8).

This notification applies to the following CCR unit at this facility:

CCR Surface Impoundment  
NED Slag Pond

Signed,

A handwritten signature in blue ink, appearing to read "Jeff Maxted", written over the word "Signed,".

Print Name Jeff Maxted	Title Lead Environmental Specialist
Phone No. or Email Address (608) 458-3853; jeffreymaxted@alliantenergy.com	

## SCS ENGINEERS

January 31, 2018  
File No. 25216054.00

Ms. Jenna Wischmeyer  
Alliant Energy  
200 1st Street SE  
Cedar Rapids, IA 52401

Subject: Certification of Closure – Slag Pond  
Nelson Dewey Generating Station, Cassville, Wisconsin

Dear Ms. Wischmeyer:

The closure of the Slag Pond has been conducted as part of the decommissioning of the Nelson Dewey Generating Station. As of the date of this letter, decommissioning activities at the facility are ongoing, but the Slag Pond closure construction has been completed to the extent necessary to satisfy the requirements for closure in 40 CFR 257.102. The Slag Pond has been closed by leaving coal combustion residue (CCR) in place, and the closure has been completed in accordance with the performance standards in 40 CFR 257.102(d). A final cover system that meets the requirements of 40 CFR 257.102(d)(3)(i) and (ii) has been installed over the CCR that remains in the Slag Pond.

The final cover system that was approved by the Wisconsin Department of Natural Resources (WDNR) and installed over the majority of the Slag Pond consists of the following components from the bottom up:

- A reinforced geosynthetic clay liner (GCL) laminated to a textured polyethylene geomembrane
- Geocomposite drainage layer
- 24-inch thick soil rooting zone layer
- 6-inch thick topsoil layer

In accordance with 40 CFR 257.102(d)(3)(ii)(A), the laminated GCL performs as an equivalent to the infiltration layer described in 40 CFR 257.102(d)(3)(i)(A) and (B). The 6-inch thick topsoil layer performs as the erosion layer described in 40 CFR 257.102(d)(3)(i)(C). The geocomposite drainage layer and 24-inch thick rooting zone layer enhance the function of both the laminated GCL (equivalent infiltration layer) and the topsoil layer (erosion layer).



The laminated GCL and geocomposite drainage layer were installed throughout the Slag Pond final cover area. However, WDNR-approved variations in the soil components of the final cover system were installed in select areas as described below:




- Final cover access road areas – the 24-inch rooting zone and 6-inch topsoil components were replaced with the following from the bottom up:
  - 18-inch thick sandy general fill layer
  - 18-inch thick breaker run layer
  - 6-inch thick aggregate surface course layer (equivalent erosion layer)
  
- Barge slip and perimeter road areas – the 24-inch rooting zone and 6-inch topsoil components were replaced with the following from the bottom up:
  - Non-woven geotextile separator layer
  - 24-inch thick open graded base aggregate layer
  - 6-inch thick aggregate surface course layer (equivalent erosion layer)
  
- Select perimeter drainage areas – the 24-inch rooting zone and 6-inch topsoil components were replaced with the following from the bottom up:
  - Non-woven geotextile separator layer
  - 20-inch thick light riprap layer (equivalent erosion layer)


In each variation of the final cover system, the laminated GCL (equivalent infiltration layer) is present as required by 40 CFR 257.102(d)(3)(ii)(A). In each variation of the final cover system an equivalent erosion layer is provided per 40 CFR 257.102(d)(3)(ii)(B). Each equivalent erosion layer was selected to provide erosion protection considering the potential for traffic or concentrated surface water flow over the final cover in these areas.

**P.E. Certification**

	<p>I, Eric J. Nelson, hereby certify that the closure of the Slag Pond at the Nelson Dewey Generating Station has been completed in accordance with the written closure plan, the final cover system described in this correspondence, and the requirements of 40 CFR 257.102. This certification is based on my review of the written closure plan posted to Alliant Energy's CCR Rule Compliance Data and Information website and my oversight of the design and construction of the Slag Pond final cover system. I am a duly licensed Professional Engineer under the laws of the State of Wisconsin.</p>
	<p style="text-align: right;">  <span style="float: right;">1/31/2018</span> </p>
	<p>(signature) <span style="float: right;">(date)</span></p>
	<p>Eric J. Nelson        (printed or typed name)</p>
	<p>License number <u>E-37855-6</u></p> <p>My license renewal date is July 31, 2018.</p> <p>Pages or sheets covered by this seal:        Certification of Closure - Slag Pond (all pages)</p>

Sincerely,

  
 Eric J. Nelson  
 Senior Project Manager  
**SCS ENGINEERS**

  
 Mark R. Huber  
 Project Director  
**SCS ENGINEERS**

EJN/AJR/MRH

cc: Jeff Maxted, Alliant Energy  
 Jill Stevens, Alliant Energy  
 Jon Jackson, Nelson Dewey Generating Station  
 Duane Fritz, Nelson Dewey Generating Station