Post-Closure Care Plan Amendment No. 1

Slag Pond Former Nelson Dewey Generating Station Cassville, Wisconsin

Prepared for:

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

SCS ENGINEERS

25222071.00 | June 30, 2022

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PE CERTIFICATION

ERIC J.	I, Eric J. Nelson, hereby certify that this c Post-Closure Care Plan meets the requirem 257.104(d), was prepared by me or under supervision, and that I am a duly licensed F Engineer under the laws of the State of Wis	nents of 40 CFR my direct Professional
E-37855-006 STITZER, WIS.	(signature) Eric J. Nelson	6/30/2022 (date)
	(printed or typed name)	
	License number <u>E-37855-6</u>	
	My license renewal date is	·
	Pages or sheets covered by this seal: Post-Closure Care Plan Amendment No. 1	

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1.0 INTRODUCTION AND PROJECT SUMMARY

On behalf of Wisconsin Power and Light Company (WPL), SCS Engineers (SCS) has prepared this amended Post-Closure Care Plan for the Slag Pond at the Nelson Dewey Generating Station (NED) facility in accordance with 40 CFR 257.104(d) as follows.

<u>40 CFR 257.104(d)</u>. "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."

The NED facility included three coal combustion residuals (CCR) units:

- Slag Pond The Slag Pond is a closed CCR surface impoundment. The Slag Pond was closed by leaving CCR in place under a final cover system. Therefore, the Slag Pond is also subject to the requirements of 40 CFR 257.104.
- Wisconsin Pollutant Discharge Elimination System (WPDES) Pond The WPDES Pond is a CCR surface impoundment that was closed by removal in accordance with 40 CFR 257.102(c) and is therefore not subject to the post-closure care criteria under section 40 CFR 257.104. The WPDES Pond is not the subject of this plan and is not discussed further herein.
- CCR landfill The CCR landfill was closed prior to October 19, 2015, and is not subject to the rule requirements. The closure was approved by the Wisconsin Department of Natural Resources (WDNR) and the facility is currently complying with WDNR Long-Term care requirements including ongoing groundwater monitoring. The closed CCR landfill is not the subject of this plan and is not discussed further herein.

The site location is shown on **Figure 1**. **Figures 2** and **3** show the current conditions at the facility and monitoring locations.

CCR was consolidated within the Slag 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. WPL is currently conducting post-closure care in accordance with 40 CFR 257.104(b).

2.0 MONITORING AND MAINTENANCE ACTIVITIES

<u>40 CFR 257.104(d)(1)(i).</u> "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
Inspections by Owner/Operator	Quarterly
Inspections by Licensed Professional Engineer	As requested by Owner/Operator
Repair to final cover	As needed, determined by inspection
Inspect Groundwater Monitoring System	Quarterly

Monitoring and Maintenance Activities	Frequency
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 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, WPL will repair and reseed the area.

2.2 GROUNDWATER MONITORING AND SYSTEM MAINTENANCE

Groundwater monitoring wells B7R, B11R/B11A/B11B, B26, B31A, and B31R 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 NED during the post-closure period is as follows:

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

4.0 POST-CLOSURE PERIOD SITE USE

<u>40 CFR 257.104(d)(1)(iii).</u> "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 NED Slag Pond will be privately owned green space. With this use, there will be no disturbance of the final cover or any other related components.

5.0 CERTIFICATIONS

<u>40 CFR 257.104(d)(4).</u> "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 Nelson, PE, a licensed professional engineer in the State of Wisconsin, 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

<u>40 CFR 257.104(b)(2)(iii).</u> "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.

WPL 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.

WPL 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**

• Post-Closure Care Plan – Slag Pond, Wisconsin Power and Light Company Nelson Dewey Generating Station, SCS Engineers, Madison, Wisconsin, October 6, 2016.

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Figures

- 1 Site Location Map
- 2 Aerial View
- 3 Site Plan and Monitoring Well Locations



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