Notification of Intent to Initiate Closure of Inactive Coal Combustion Residuals Surface Impoundment WPDES Pond Nelson Dewey Generating Station, Cassville, Wisconsin Wisconsin Power and Light Company

In compliance with 40 CFR 257.100, Wisconsin Power and Light Company (WPL) intends to initiate closure of the Wisconsin Pollutant Discharge Elimination System (WPDES) Pond, which is an inactive Coal Combustion Residual (CCR) impoundment at the Nelson Dewey Generating Station in Cassville, Wisconsin.

Impoundment Status under CCR Rule (40 CFR 257)

The WPDES Pond is inactive as defined in 40 CFR 257.53. According to WPL, the WPDES Pond stopped receiving CCR prior to October 19, 2015. The WPDES Pond still contains CCR that was received by the impoundment prior to October 19, 2015, and not subsequently removed. The WPDES Pond also currently contains liquids.

Closure Narrative

WPL intends to close the WPDES Pond by removing the CCR to meet the requirements in 40 CFR 257.100(b)(5). Based on information available as of the date of this notification, which includes a preliminary estimate of the volume of accumulated CCR in the WPDES Pond provided to us by WPL. Accumulated sediment and CCR will be removed from the impoundment and disposed appropriately. There is no liner in the WPDES Pond to be removed to close the pond.

Schedule of Closure Activities

The schedule for closure activities is based in part on the estimated volume of CCR in the WPDES Pond described above. Scheduled actions to complete the closure activities include the following:

TASK	CLOSURE ACTIVITIES	START DATE OR MONTH	END DATE OR MONTH
1	Notification of Intent to Close		December 17, 2015
2	Project Development	December 2015	July 2016
3	Engineering	July 2016	January 2017
4	Permitting	November 2016	March 201 <i>7</i>
5	Procurement	January 2017	May 2017
6	Construction	May 2017	October 2017
7	Complete Closure Documentation and Notification of Completion	October 2017	December 2017

STATEMENT OF CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

40 CFR 257.100(b)(4) - Design of Final Cover System Meets 257.100(b)(3)

Not Applicable. Impoundment to be closed through removal of CCR per 257.100(b)(5).

40 CFR 257.100(b)(6) — Technical Feasibility of Completion Before April 17, 2018.

I, <u>Eric J. Nelson</u>, being an engineer licensed by the State of Wisconsin with Professional Registration No. 37855-6, certify that the approach and schedule described in this Notification of Intent to Initiate Closure is technically feasible to complete by April 17, 2018, based on the information available to me at this time.

Signature

12-14-20/5 Date