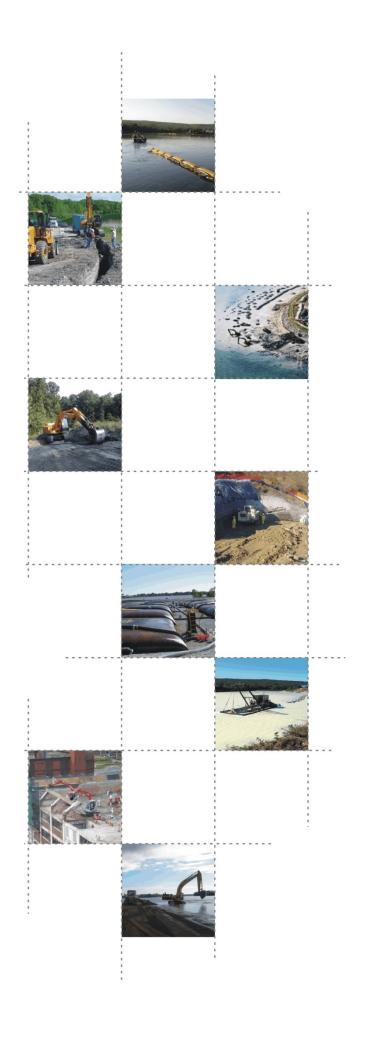
ALLIANT ENERGY Wisconsin Power and Light Company Nelson Dewey Generating Station

CCR SURFACE IMPOUNDMENT

HISTORY OF CONSTRUCTION

Report Issued: September 20, 2016 Revision 0

> **HARD HAT SERVICES**TM Engineering, Construction and Management Solutions



EXECUTIVE SUMMARY

This History of Construction (Report) is prepared in accordance with the requirements of the United States Environmental Protection Agency (USEPA) published Final Rule for Hazardous and Solid Waste Management System - Disposal of Coal Combustion Residual (CCR) from Electric Utilities (40 CFR Parts 257 and 261, also known as the CCR Rule) published on April 17, 2015 and effective October 19, 2015.

This Report documents the construction history of each CCR unit at Nelson Dewey Generating Station in Cassville, Wisconsin in accordance with §257.73(c) of the CCR Rule. For purposes of this Report, the term "CCR unit" only refers to existing CCR surface impoundments.

Primarily, this Report is focused on providing history of construction information for each CCR surface impoundment to the extent feasible, provided that such information is reasonably and readily available.



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1 INTRODUCTION

The owner/operator of the CCR unit must provide a history of construction for the existing CCR surface impoundment at Nelson Dewey Generating Station (NED) in Cassville, Wisconsin in accordance with §257.73(c)(1) of the CCR Rule. Hard Hat Services, on behalf of Wisconsin Power and Light Company, has provided history of construction information for the existing CCR surface impoundment to the extent feasible, provided that such information is reasonably and readily available.

1.1 CCR Rule Applicability

The CCR Rule requires that an owner/operator of the CCR unit must provide a history of construction for existing CCR surface impoundments with a height of 5 feet or more and a storage volume of 20 acre-feet or more (§257.73(b)(1)); or the existing CCR surface impoundment has a height of 20 feet or more (§257.73(b)(2)).

1.2 History of Construction Applicability

NED has one existing CCR surface impoundment, which meets the requirements of §257.73(b)(1) and/or §257.73(b)(2), identified as the NED Slag Pond.

Wisconsin Power and Light Company also has one inactive CCR surface impoundment, the NED WPDES Pond. The NED WPDES Pond will be handled under a separate transmittal in accordance with the CCR Rule, if needed, and is not discussed further herein.



2 FACILITY DESCRIPTION

The following sub-sections provide a general facility description.

2.1 Name and Address - §257.73(c)(1)(i)

Included below is the name and address of the owner/operator of the CCR unit, name of the CCR unit, and state identification number for the CCR Unit (if one has been assigned by the state).

Owner/Operator Name and Address:

Wisconsin Power and Light Company (an Alliant Energy Company) Nelson Dewey Generating Station 11999 County Highway VV Cassville, WI 53806

The name of the CCR Unit located at NED is the NED Slag Pond. No state identification number has been assigned to the CCR unit at NED.

2.2 General Facility History

NED is located north of the City of Cassville, Wisconsin on the Mississippi River in Grant County. Figure 1 provides both a topographic map and an aerial photograph of the NED facility location, with the approximate property boundary of the facility identified.

NED, originally owned/operated by the Wisconsin Power and Light Company, initiated facility operations in 1959. At the time of initial operations NED was a fossil-fueled electric generating station that consisted of one steam electric generating unit (Unit 1) which at the time used bituminous coal as its fuel source. The initial steam electric generating unit at NED had a nameplate rating of 100 Megawatts (MW). The original CCR surface impoundment, identified as an ash disposal area in historical documents, was constructed at the time of initial facility operations and was located northwest of the generating plant. Historical drawings that identify the location of the ash disposal area are provided in Appendix F.



The CCR that was produced from the burning of coal included slag and fly ash. Unit 1 consisted of three cyclone furnaces. The cyclone furnaces would burn the coal and produce molten bottom ash. The molten bottom ash, once removed from the cyclone furnaces, would be quenched in water which produced the slag. The slag would then be sluiced out to the ash disposal area. At the time, the fly ash that was produced was not recovered as it would get carried from the boiler furnace as part of the flue gas.

In 1962, a second steam electric generating unit (Unit 2) was constructed and initiated operations. Unit 2 had a nameplate rating of 100 MW. Similar to Unit 1, Unit 2 consisted of three cyclone furnaces. The slag that was produced from Unit 2 was sluiced to the ash disposal area. The fly ash that was produced was not recovered as it would get carried from the boiler furnace as part of the flue gas. The CCR that was produced at NED was handled in this manner until 1973.

In 1973, the electrostatic precipitators for Unit 1 and Unit 2 were constructed. With the construction of the electrostatic precipitators, fly ash from Unit 1 and Unit 2 was electrostatically precipitated and collected. At this time, the fly ash was sluiced to the ash disposal area. The sluiced fly ash was not intermixed with the sluiced slag. The two forms of CCR were kept separated by an interior berm with slag sluiced to the south of the berm (area presently identified as the NED Slag Pond) and fly ash sluiced north of the berm (area presently identified as the closed ash landfill).

Approximately 8,355,000 tons of coal had been consumed between 1959 and 1976, as reported in an Ash Disposal Feasibility Report¹ dated June 17, 1976. During that time, an average of approximately 135 tons of CCR was produced on a daily basis. The average production of CCR on an annual basis was approximately 49,000 tons. Approximately 80% of the CCR was comprised of slag while the other 20% was comprised of fly ash.



¹ Physical Site Description and Ash Disposal Feasibility Report, Nelson Dewey Generating Station, June 17, 1976, Warzyn Engineering and Service Company, Inc.

As documented in a Department of the Army Public Notice² dated July 23, 1976, the Wisconsin Department of Natural Resources (WDNR) directed NED to remove the slag which had been accumulating since the generating plant went into operation in 1959. At the time, the most feasible method of removing the large quantity of slag was by barge. In order to comply with the WDNR directive, a barge loading slip was constructed south of the ash disposal area along the shore of the Mississippi River. Initially, a screening plant, hopper, and conveyor system was used to load the slag into the barges. The slag was then hauled off-site for beneficial reuse. Figures identifying the proposed design of the barge loading slip are provided in Appendix F. Additional discussions on historical operations and handling of the slag at NED is provided in further detail throughout Section 3.

In 1977, NED was provided authorization to proceed with the construction of an ash disposal facility (formerly identified as the ash disposal area in historical documents), as well as construction of enclosing embankments. As documented in a Department of the Army Permit Notification³ dated October 05, 1977, approximately 1,000 feet of existing embankment, located south of the ash disposal area, was raised approximately three feet to an elevation of 625 (feet above mean sea level). Additionally, approximately 2,600 feet of new enclosing embankments, located west and north of the ash disposal area, were constructed to the same elevation. Figures identifying the proposed embankment construction and improvements are provided in Appendix F. Additional discussions on the embankment modifications is provided in further detail throughout Section 3.

An Ash Disposal Facility Plan of Operation⁴ dated March 29, 1978 was prepared to go along with the newly constructed ash disposal facility which was to consist of a series of infiltration basins. The general plan of operation for the ash disposal facility included

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² Department of the Army Public Notice, Nelson Dewey Generating Station, July 23, 1976, Rock Island District Corps of Engineers

³ Department of the Army Permit Notification, Nelson Dewey Generating Station, October 05, 1977, Rock Island District Corps of Engineers

⁴ Final Design Engineering and Plan of Operation Ash Disposal Facility, Nelson Dewey Generating Station, March 29, 1978, Warzyn Engineering and Service Company, Inc.

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procedures for fly ash and slag disposal and/or storage and removal, wastewater disposal, general operations, and final abandonment. The plan of operation identified the process for sluicing fly ash to the ash disposal facility. Additional discussions on historical operations and handling of the CCR at NED is provided in further detail throughout Section 3.

In 1995, NED modified the Ash Disposal Facility Plan of Operation. As documented in a Plan Modification to the Plan of Operation⁵ dated October 1995, the fly ash handling operations at NED were modified from a sluicing operation to a dry fly ash method of placement. The dry fly ash was transported via over-the-road haul truck and placed in the ash disposal facility. The dry fly ash was covered with a temporary geomembrane cover and eventually with a final cover system upon reaching closure grades. Additional discussions on the modification of fly ash handling operations, as well as discussions on the phased closure of the ash disposal facility, is provided in further detail throughout Section 3.

From 1959 to 1998 the owner/operator of NED was the Wisconsin Power and Light Company. In 1998, a three-way merger was completed between IES Industries, Interstate Power Company, and Wisconsin Power and Light Company forming Interstate Energy Corporation. In 1999, Interstate Energy Corporation changed its name to Alliant Energy Corporation.

As NED exists today, the generating plant consists of two steam electric generating units. Both units were retired in 2015 as NED ceased facility operations. Prior to the facility ceasing operations, sub-bituminous coal was the primary fuel for producing steam. The burning of coal at NED produced two types of CCR, which included slag and fly ash. CCR operations at NED included slag being sluiced to what is now identified as the NED Slag Pond, which is the only existing CCR surface impoundment present at NED. The slag was dredged from the NED Slag Pond on a regular basis and temporarily stockpiled



⁵ Plan Modification To The Plan of Operation, Nelson Dewey Generating Station, October 1995, RMT, Inc. <u>Wisconsin Power and Light Company – Nelson Dewey Generating Station</u>

adjacent to the existing CCR surface impoundment for dewatering prior to transporting off-site via over-the-road haul truck for beneficial reuse. Prior to October 19, 2015, dredging and dewatering activities were relocated to an area within the NED Slag Pond and remained there until the retirement of the generating units. No stockpiling outside of the NED Slag Pond has occurred on or after October 19, 2015. The fly ash produced at NED was collected by the electrostatic precipitators and conveyed to the on-site fly ash storage silo. The fly ash produced at NED was transported off-site via over-the-road haul truck for beneficial reuse.



HISTORY OF CONSTRUCTION - §257.73(c)(1) 3

This Report documents the history of construction information for each existing CCR surface impoundment to the extent feasible, provided that such information is reasonably and readily available. The following activities were completed in order to reasonably collect and assemble the readily available history of construction information:

- File review at the local regulatory agency;
- Historical aerial photography review;
- Historical topography review;
- Onsite design drawing, specification, and report review;
- Electronic design drawing, specification, and report review; and
- Interview(s) with onsite personnel with historical knowledge of the existing CCR surface impoundment.

3.1 NED Slag Pond

The following subsections are intended to meet the requirements of the CCR Rule §257.73(c)(1) for the NED Slag Pond.

3.1.1 CCR Unit Location - §257.73(c)(1)(ii)

The NED Slag Pond is located northwest of the generating plant and south of the on-site closed ash landfill. The location of the NED Slag Pond, in reference to the surrounding topography, is identified on both a USGS 7 ¹/₂ minute topographic quadrangle map and aerial photograph on Figure 1. The location of the NED Slag Pond, in reference to the immediate surroundings within the NED property, is identified on Figure 2.

3.1.2 Statement of Purpose - §257.73(c)(1)(iii)

As of December 31, 2015 NED ceased generation operations and thus the NED Slag Pond ceased being a primary receiver of sluiced CCR and process flows from the generating plant. Presently, the NED Slag Pond is a primary receiver of storm water runoff from the on-site closed ash landfill located north of the CCR unit, as well as storm water runoff from the former slag handling areas located south and east of the CCR unit. The storm water that accumulates in the NED Slag Pond no longer discharges through the existing



hydraulic structure located in the southwest corner of the CCR unit, as it either exfiltrates into the ground or evaporates.

Prior to the facility ceasing generation operations, the NED Slag Pond was a primary receiver of sluiced CCR (slag). The slag was sluiced from the generating plant to the east end of the NED Slag Pond where the majority of the CCR was recovered. A dozer was utilized to push the CCR to the south towards an excavator for dredging. The dredged CCR was stockpiled adjacent to the NED Slag Pond for dewatering. Prior to October 19, 2015, dredging and dewatering activities were relocated to an area within the NED Slag Pond and remained there until the retirement of the generating units. No stockpiling outside of the NED Slag Pond has occurred on or after October 19, 2015. Once dewatered, the CCR was then transported off-site for beneficial reuse.

In addition to sluiced CCR, the NED Slag Pond was also a primary receiver of process flows from the generating plant. The process flows included wastewater periodically pumped from the Wisconsin Pollution Discharge Elimination System (WPDES) Pond and flows associated with the seal well sump pumps. Flows from the seal well sump pumps included soot blowers, air compressors, boiler blowdown, Unit 1 and Unit 2 floor sumps, oil and hydrogen coolers and demineralization/reverse osmosis multi-media units.

The water used to sluice CCR to the NED Slag Pond, as well as water from process flows, discharged into the east end of the NED Slag Pond. The water flowed from the east end to the west end of the CCR unit. The southwest corner of the NED Slag Pond consists of the facility's WPDES Outfall 002. The outfall structure consists of a notched weir that discharges into a thirty inch diameter reinforced concrete pipe (RCP). The water flowed through the WPDES Outfall 002, under the adjacent access road along the west side of the NED Slag Pond, and discharged into a riprap lined swale that flowed to the southwest into the Mississippi River.



3.1.3 Physical Layout Information - §257.73(c)(1)(iv)

As identified in an Inflow Flood Control Plan⁶ prepared for NED in accordance with §257.82 of the CCR Rule, the NED Slag Pond has a watershed of approximately 20 acres. The drainage area includes the on-site closed ash landfill located to the north of the NED Slag Pond, as well as the former slag handling areas located to the south and east of the NED Slag Pond.

As discussed in an Annual Inspection Report⁷ prepared for NED in accordance with §257.83 of the CCR Rule, the NED Slag Pond is incised except for along the west embankment and southeast corner of the CCR unit. The west embankment of the NED Slag Pond has a height of approximately 18 feet from the crest to the toe of the downstream slope of the embankment at its greatest height. The interior storage depth of the NED Slag Pond is approximately 10 feet. The total volume of impounded CCR and water within the NED Slag Pond is approximately 75,000 cubic yards.

3.1.4 Foundation and Abutment Properties - §257.73(c)(1)(v)

As identified in an Ash Disposal Feasibility Report⁸ dated June 1976, the NED Slag Pond (formerly identified as the ash disposal area) is confined within the bottomlands adjacent to the Mississippi River on the west, and the cliff-forming Platteville dolomite to the east. Deep steep-sided valleys (usually flat-bottomed) separated by narrow rolling ridges are typical of this area. Deep bedrock valleys often are present below the flat bottomed streams of southwest Wisconsin, a result of lower water levels during periods of glaciation. The subsoils generally consist of CCR, glacio-fluvial deposits (outwash sand and gravel), and alluvial deposits (sands and silts). The alluvial deposits form a relatively thin veneer over the thicker underlying outwash deposits. The total thickness of the sand and gravel deposits is about 150 feet. The Prairie du Chien dolomite is the underlying bedrock at NED. The dolomite rock, encountered by a Village of Cassville well, was

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⁶ Inflow Flood Control Plan, Nelson Dewey Generating Station, 2016, Hard Hat Environmental Services

⁷ Annual Inspection Report, Nelson Dewey Generating Station, 2016, Hard Hat Environmental Services

⁸ Physical Site Description and Ash Disposal Feasibility Report, Nelson Dewey Generating Station, June 17, 1976, Warzyn Engineering and Service Company, Inc.

identified after penetrating 160 feet of unconsolidated sand and gravel. The thickness of the bedrock at the well location was approximately 240 feet.

In 1957, deep soil borings were installed at NED prior to construction of the generating plant. The locations of the installed soil borings, as well as the soil boring logs, are enclosed in Appendix D. In 2011, soil borings were installed in the area of the NED Slag Pond along the west and south embankments (Appendix E) in order to determine the types of soil present in the embankments and foundation. The soil boring logs are enclosed in Appendix E.

As identified in an Ash Pond Slope Stability and Hydraulic Analysis⁹ dated June 2011, the soil borings indicate that below the embankments consists of native sand (poorly and well-graded) below surface fill at a depth of eleven to eighteen feet. This is consistent with the United States Geological Survey (USGS) Grant County Wisconsin Soil Survey that describes Sparta loamy fine sand and Arenzville silt loam surface soils in the area of NED.

3.1.5 Historical Construction and Use - §257.73(c)(1)(vi)

The NED Slag Pond (formerly identified as part of the ash disposal area in historical documents) was constructed at the time of initial facility operations in 1959 in an area located northwest of the generating plant. There are no known historical drawings that identify the initial layout of the ash disposal area, however, drawings obtained from a Secretary of the Army authorization letter¹⁰ dated March 20, 1957 identifies the proposed construction of the power station and dock facilities. The drawings of the proposed construction are included in Appendix A.

There are no known reasonably and readily available documents that detail the method of site preparation and construction of each zone of the NED Slag Pond (formerly



⁹ Ash Pond Slope Stability and Hydraulic Analysis, Nelson Dewey Generating Station, June 27, 2011, Aether DBS ¹⁰ Secretary of the Army Authorization Letter, Nelson Dewey Generating Station, March 20, 1957, Rock Island **District Corps of Engineers**

identified as part of the ash disposal area) at the time of initial facility operations. The first known readily available drawings that identify the ash disposal area at NED was identified in an Ash Disposal Feasibility Report¹¹ dated June 1976 (Appendix F). In addition to the drawings, the Ash Disposal Feasibility Report provides a summary of the historical operations and handling of CCR at NED from initial facility operations in 1959 to 1976.

The CCR that was produced from the burning of coal included slag and fly ash. The slag that was produced was sluiced out to the ash disposal area. The fly ash that was produced was not recovered as it would get carried from the boiler furnace as part of the flue gas. The CCR that was produced from Unit 1 and Unit 2 was handled in this manner until 1973. In 1973, the electrostatic precipitators for Unit 1 and Unit 2 were constructed. With the construction of the electrostatic precipitators, fly ash from Unit 1 and Unit 2 was electrostatically precipitated and collected. At this time, the fly ash was sluiced to the ash disposal area. The sluiced fly ash was not intermixed with the sluiced slag. The two CCR products were kept separated by an interior berm with slag sluiced to the south side of the berm (presently identified as the NED Slag Pond) and fly ash sluiced north of the berm (presently identified as the closed ash landfill).

As documented in a Department of the Army Public Notice¹² dated July 23, 1976, the WDNR directed NED to remove the slag which had been accumulating since the generating plant went into operation in 1959. At the time, the most feasible method of removing the large quantity of slag was by barge. In order to comply with the WDNR directive, a barge loading slip was constructed south of the ash disposal area along the shore of the Mississippi River. Initially, a screening plant, hopper, and conveyor system was used to load the slag into the barges. The slag was then hauled off-site for beneficial

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¹¹ Physical Site Description and Ash Disposal Feasibility Report, Nelson Dewey Generating Station, June 17, 1976, Warzyn Engineering and Service Company, Inc.

¹² Department of the Army Public Notice, Nelson Dewey Generating Station, July 23, 1976, Rock Island District Corps of Engineers

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reuse. Figures identifying the proposed design of the barge loading slip are provided in Appendix F.

In 1977, NED was provided authorization to proceed with the construction of an ash disposal facility (formerly identified as the ash disposal area in historical documents), as well as construction of enclosing embankments. As documented in a Department of the Army Permit Notification¹³ dated October 05, 1977, approximately 1,000 feet of existing embankment, located south of the ash disposal area, was raised approximately three feet to an elevation of 625. Additionally, approximately 2,600 feet of new enclosing embankments, located west and north of the ash disposal area, were constructed to the same elevation. The embankments were constructed of a compacted soil-slag mixture. A part of the perimeter embankment, located south of the ash disposal facility, received riprap placement to protect the embankment from river erosion during high water. Approximately 52,000 cubic yards of material was needed for the construction of the exterior embankments. The interior embankments that were constructed consisted of a soil-slag mixture as well. Figures identifying the proposed embankment construction and improvements are provided in Appendix F.

An Ash Disposal Facility Plan of Operation¹⁴ dated March 29, 1978 was prepared to go along with the newly constructed ash disposal facility which was to consist of a series of infiltration basins. The general plan of operation for the ash disposal facility included procedures for fly ash and slag disposal and/or storage and removal, wastewater disposal, general operations, and final abandonment. The plan of operation identified the process for sluicing fly ash to the ash disposal facility. The fly ash was to be sluiced three times per day to an existing primary settling basin via one ten-inch diameter sluice pipe. The three discharge periods were to be approximately three hours in duration each. The discharge rate was to be approximately 2,000 gallons per minute. The effluent from



¹³ Department of the Army Permit Notification, Nelson Dewey Generating Station, October 05, 1977, Rock Island District Corps of Engineers

¹⁴ Final Design Engineering and Plan of Operation Ash Disposal Facility, Nelson Dewey Generating Station, March 29, 1978, Warzyn Engineering and Service Company, Inc.

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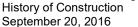
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the primary settling basin was to be discharged to a slag settling/infiltration basin (presently identified as the NED Slag Pond). The plan of operation also identified the handling of slag at NED. The slag was to be sluiced three times per day to the slag settling/infiltration basin. Slag removed from the slag settling/infiltration basin was to be conveyed directly to transport vehicles or stockpiled on-site. Final disposal of slag onsite was to take place only during berm construction, fly ash covering, and during phase abandonment and final abandonment operations. At the time, water used to sluice the slag to the slag settling/infiltration basin was to be assimilated by the basin by means of infiltration through the basin floor. In the event that the inflow exceeded the infiltration, the water in the slag settling/infiltration basin would discharge to the river via an overflow weir. The initial hydraulic structure associated with the slag settling/infiltration basin consisted of a thirty inch diameter RCP. The hydraulic structure discharged to the southwest of the slag settling/infiltration basin into a swale that flowed to the southwest into the Mississippi River. From 1978 to 1995 CCR at NED was generally handled in this manner. Drawings of the initial configurations of the slag settling/infiltration basin and hydraulic structure are provided in Appendix F.

In 1995, NED modified the Ash Disposal Facility Plan of Operation. As documented in a Plan Modification to the Plan of Operation¹⁵ dated October 1995, the fly ash handling operations at NED were modified from a sluicing operation to a dry fly ash method of placement. The dry fly ash was transported via over-the-road haul truck and placed in the ash disposal facility. The dry fly ash was covered with a temporary geomembrane cover and eventually with a final cover system upon reaching closure grades.

In 1996, NED completed the first phase of the closed ash landfill final cover system. The northern portion of the ash disposal facility received placement of a final cover system, which included a 6-inch sand grading layer, a geo-composite clay liner (GCL), 24 inches of silty-sand loam, and 6 inches of topsoil. In 1997, NED completed the second phase of

¹⁵ Plan Modification to the Plan of Operation, Nelson Dewey Generating Station, October 1995, RMT, Inc. Wisconsin Power and Light Company – Nelson Dewey Generating Station



the closed ash landfill final cover system, which included the area in the southeastern portion of the ash disposal facility located north of the slag settling/infiltration basin. In 1999, NED completed the third phase of the closed ash landfill final cover system, which included the central western portion of the ash disposal facility. In 2001, NED completed the fourth and final phase of the closed ash landfill final cover system, which included the southwest portion of the ash disposal facility located north of the slag settling/infiltration basin.

The closed ash landfill effectively reduced the size of the CCR Unit to the current layout of the NED Slag Pond, as shown on Figure 2.

The following list provides a general overview of known modifications associated with the NED Slag Pond since construction of the existing CCR surface impoundment.

- The slag settling/infiltration basin was re-identified as the NED Slag Pond. The timeframe of this modification has not been documented, but is likely when NED changed to a dry fly ash handling system.
- The hydraulic structure associated with the NED Slag Pond was listed with the • State of Wisconsin in the facilities Wisconsin Pollutant Discharge Elimination System (WPDES) Permit as WPDES Outfall 002. The timeframe of this modification has not been documented.
- A flow meter was installed at the location of the hydraulic structure that is associated with WPDES Outfall 002. The timeframe of this modification has not been documented.
- In 2001, NED constructed an ash storage pad located along the crest of the south • embankment of the NED Slag Pond. The ash storage pad, constructed of asphalt, was utilized to allow the slag stockpile to dewater and drain back into the NED Slag Pond via two 12-inch ductile iron pipes. The slag, once dewatered, would



then be loaded into over-the-road haul trucks and hauled off-site for beneficial reuse. Drawings of the proposed ash storage pad are provided in Appendix F.

- In 2011, NED completed an Ash Pond Slope Stability and Hydraulic Analysis¹⁶ in order to evaluate the NED Slag Pond under a 100-year storm flow, as well as for static, and seismic, induced slope stability. The analysis determined the west embankment of the NED Slag Pond had factors of safety greater than the standard acceptable factors of safety for rapid drawdown, static induced slope stability, and seismic induced slope stability.
- In 2012, a Final Assessment of Dam Safety of Coal Combustion Surface Impoundments¹⁷ report was prepared for the United States Environmental Protection Agency (USEPA), which summarized a dam assessment that was completed in 2011. The recommendations from the report included protecting the embankments of the NED Slag Pond from wave action erosion. In 2013, NED installed erosion protection along the upstream slope of the west embankment, as well as along the western portion of the upstream slope of the south embankment of the NED Slag Pond. Drawings identifying the areas where slope protection was installed are provided in Appendix F.

Historical aerial photographs (Appendix B) and historical topographic maps (Appendix C) identify the topographic changes to the NED Slag Pond that have occurred since the time of initial facility operations.

3.1.6 Structures, Appurtenances, and Operations- §257.73(c)(1)(vii)

Detailed dimensional drawings of the NED Slag Pond that were reasonably and readily available are identified below. The detailed dimensional drawings were obtained from

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¹⁶ Slope Stability & Hydraulic Analysis Report, Nelson Dewey Generating Station, May 29, 2015, Revision 1.1, Hard Hat Environmental Services

¹⁷ Final Assessment of Dam Safety of Coal Combustion Surface Impoundments, Nelson Dewey Generating Station, December 27, 2012, GZA GeoEnvironmental Inc.

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various designs, plans, and reports that were assembled during the historical information review.

- Proposed Power Station and Dock Facilities (1955) Drawings prepared by Sargent & Lundy provide proposed layout of NED generating plant and dock facilities as part of an application for permit from the United States Army Corps of Engineers (Appendix A).
- Soil Borings Location Plan & Sections (1957) Drawing prepared by Sargent & Lundy provides historical soil boring locations and soil boring logs that were completed at NED prior to construction of the generating plant and ash disposal area (Appendix D).
- Feasibility Study Ash Disposal Facility (1976) Drawings prepared by Warzyn Engineering provide first known layout of ash disposal area, as well as location of additional soil borings completed in 1976 (Appendix F).
- Proposed Barge Loading Slip (1976) Drawings provide details of the proposed construction of the barge loading slip located south of the NED Slag Pond (Appendix F).
- Proposed Ash Disposal Facility Berm Construction (1977) Drawings prepared by Warzyn Engineering provide details of the proposed berm perimeter berm construction, modifications, and enhancements for the ash disposal facility (Appendix F).
- Ash Disposal Facility Plan of Operation (1978) Drawings prepared by Warzyn Engineering provide details of the active and proposed ash disposal facility, as well as details of the initial hydraulic structure associated with the NED Slag Pond. Note, drawings identifying proposed final topography of ash disposal facility were later revised in 1995 (Appendix F).



- Ash Disposal Facility (1987) Drawing prepared by Warzyn Engineering provides details of the ash disposal facility layout in 1987 (Appendix F).
- Ash Disposal Facility (1994) Drawings prepared by RMT provide details of the existing conditions of the ash disposal facility in 1994 (Appendix F).
- Ash Disposal Facility Modified Plan of Operations (1995) Drawings prepared by RMT provide details of the proposed plan of modified operations for the ash disposal facility in 1995 (Appendix F.
- Ash Storage Pad (2001) Drawings prepared by BT² provide details of the proposed ash storage pad to be constructed south of the NED Slag Pond (Appendix F).
- NED Slag Pond Bathymetric Survey (2006) Drawing prepared by BT² provide details of the NED Slag Pond bathymetry (Appendix F).
- NED Slag Pond Soil Boring Map (2011) Drawing prepared by Hard Hat Services provides locations of the soil borings that were installed along the west and south embankment of the NED Slag Pond (Appendix E).
- NED Slag Pond Erosion Protection (2013) Drawings prepared by SCS Engineers provide details of the installation of erosion protection along the upstream slope of the west embankment and upstream slope of the western portion of the south embankment (Appendix F).

3.1.7 Instrumentation - §257.73(c)(1)(viii)

Instrumentation used to support the operation of the NED Slag Pond consists of a flow meter that monitors the discharge through WPDES Outfall 002. The instrumentation is located in the southwest corner of the NED Slag Pond.



3.1.8 Area-Capacity Curve - §257.73(c)(1)(ix)

An area-capacity curve identifies the relationship between the surface area of the existing CCR surface impoundment and an elevation, which corresponds to an available storage capacity. After review of readily available historical documents there is no readily available information regarding area-capacity curves for the NED Slag Pond.

3.1.9 Spillway and Diversion Features - §257.73(c)(1)(x)

The NED Slag Pond is equipped with one 30-inch diameter RCP located in the southwest corner of the CCR unit. The hydraulic structure is constructed of non-erodible material and designed to carry sustained flows. Additional information regarding the hydraulic capacity of the hydraulic structure associated with the NED Slag Pond is provided in the Inflow Flood Control Plan¹⁸.

3.1.10 Construction Specifications, Surveillance, Maintenance, and Repair -§257.73(c)(1)(xi)

NED implements a Site-Specific Inspection and Maintenance (I&M) Plan¹⁹, in accordance with an Alliant Energy I&M Plan²⁰. The Site-Specific I&M Plan has been implemented at NED in order to identify the factors which may affect the long-term stability of the existing CCR surface impoundment. The Site-Specific I&M Plan identifies existing operation and maintenance activities, and identifies the inspection, monitoring, maintenance, and recordkeeping requirements as outlined in the Alliant Energy I&M Plan in order to maintain the integrity of the existing CCR surface impoundment.

Visual inspections of the NED Slag Pond are completed in accordance with §257.83 of the CCR Rule. At intervals not exceeding seven days, the NED Slag Pond is visually inspected for any appearances of structural weakness or other conditions which are disrupting or have the potential to disrupt the operation or safety of the existing CCR surface impoundment. In addition to seven-day inspections, NED conducts event-related inspections which may include inspections following storm events, seismic

²⁰ Inspection and Maintenance (I&M) Plan, Alliant Energy, September 2015, Version 2.0-Revision 0.0 <u>Wisconsin Power and Light Company – Nelson Dewey Generating Station</u>



¹⁸ Inflow Flood Control Plan, Nelson Dewey Generating Station, 2016, Hard Hat Environmental Services

¹⁹ Inspection and Maintenance (I&M) Plan, Nelson Dewey Generating Station, October 2015, Version 2.0-Revision 0.0

events, major maintenance activities, as well as other unusual events. Annual inspections are conducted by a qualified Professional Engineer (P.E.) who is familiar with the requirements of the CCR Rule, the Alliant Energy I&M Plan, the NED Site-Specific I&M Plan, and other facility specific information pertaining to the existing CCR surface impoundment.

Maintenance activities that are completed at NED may include routine maintenance, event-related maintenance, and long-term maintenance. Routine maintenance activities may include management of vegetation (or other forms of slope protection), tree and sapling removal, reseeding of disturbed vegetated areas, removal of debris from collection and diversion channels, and repair of eroded areas. Event-related maintenance activities may include maintenance after unusual events such as heavy rainfall, periods of very high winds, or seismic activity. Maintenance may include repair of eroded areas or removal of damaged vegetation. Long-term maintenance activities are identified as part of the ongoing inspection program, through the annual inspections, or through other engineering evaluations and may include larger remediation activities.

3.1.11 Structural Instability Records - §257.73(c)(1)(xii)

After review of readily available historical documents there are no known records of structural instability associated with the NED Slag Pond that were identified.



4 CHANGES TO THE HISTORY OF CONSTRUCTION

If there is a significant change to any information compiled within the Report, the owner or operator of the CCR unit must update the relevant information and place into the facility's operating record as required by §257.105(f)(g).

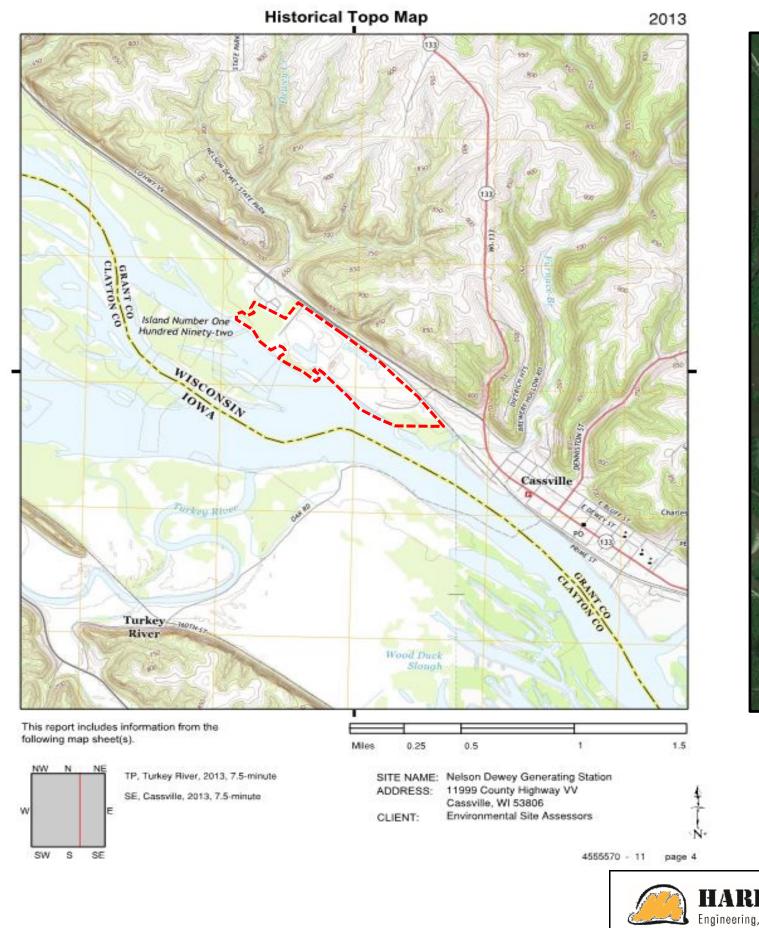


FIGURES

Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

History of Construction







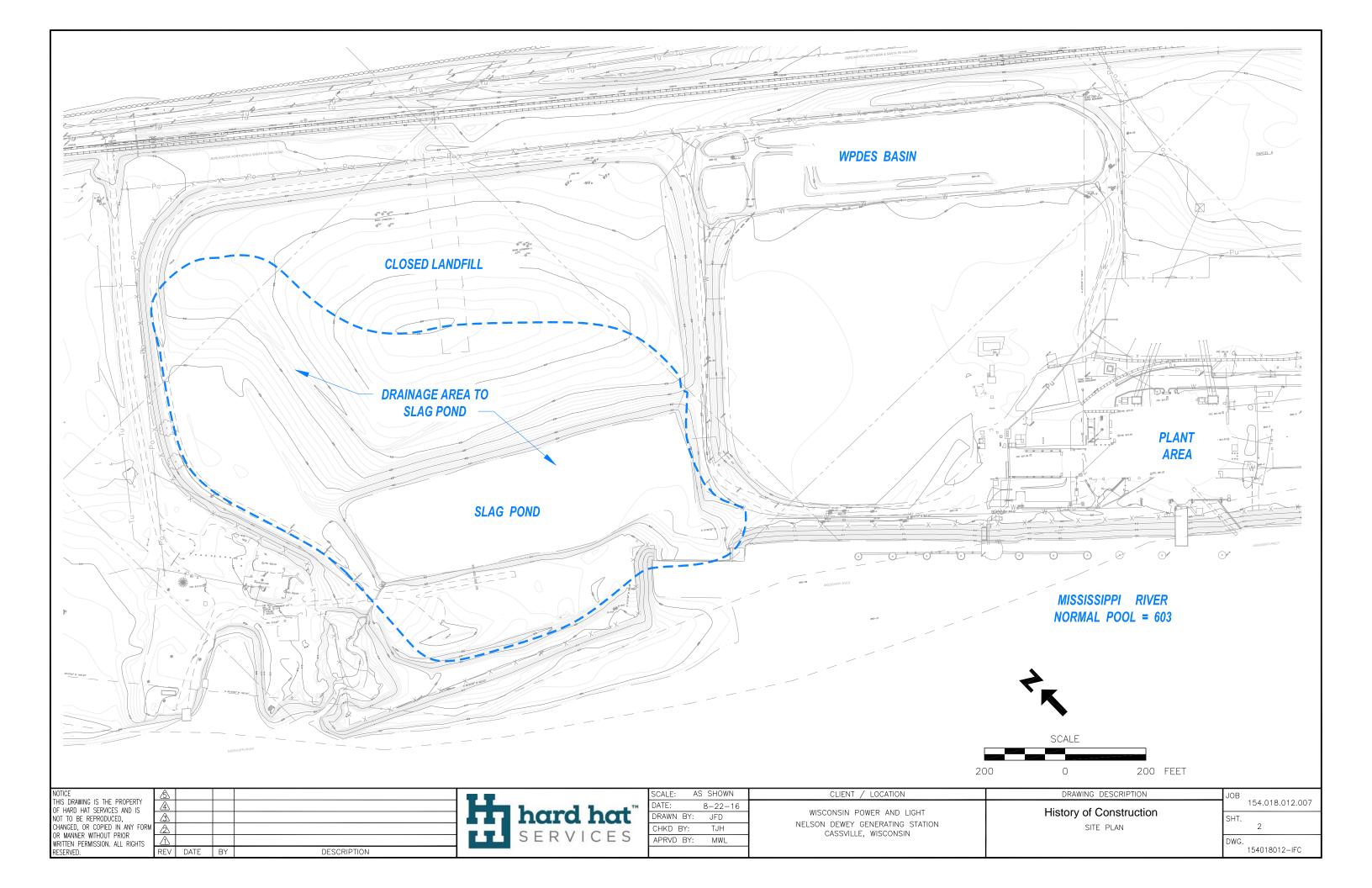


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7/13/2016

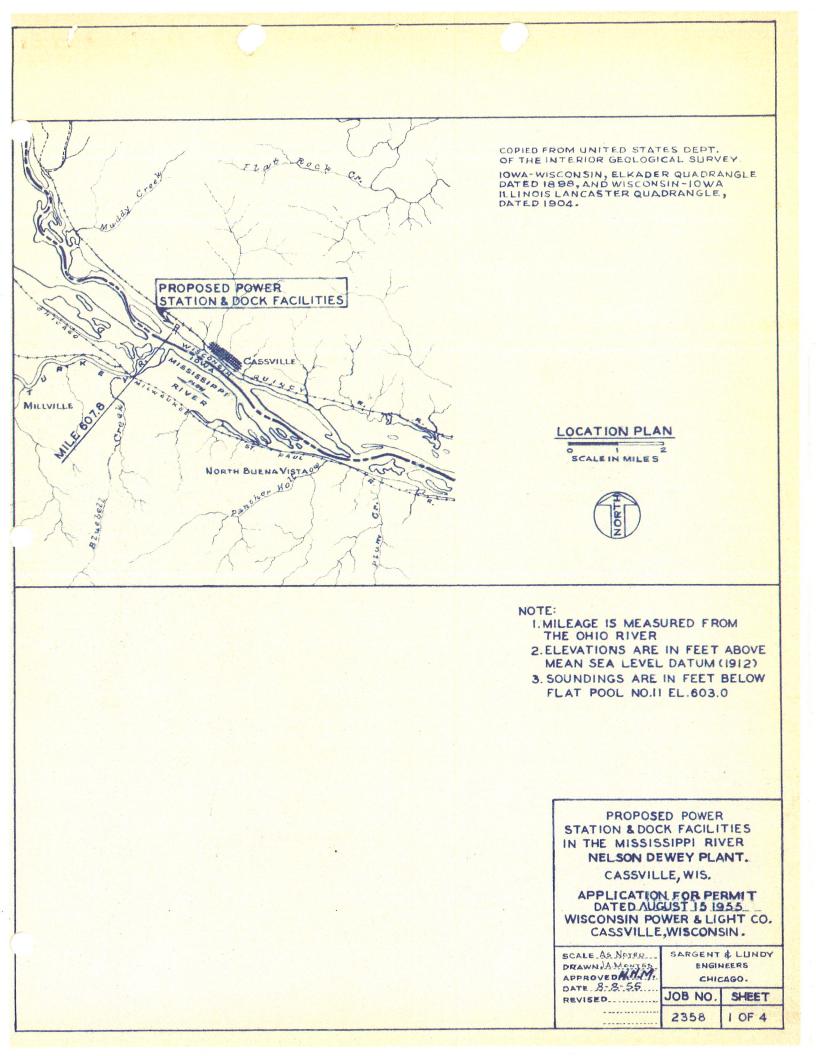


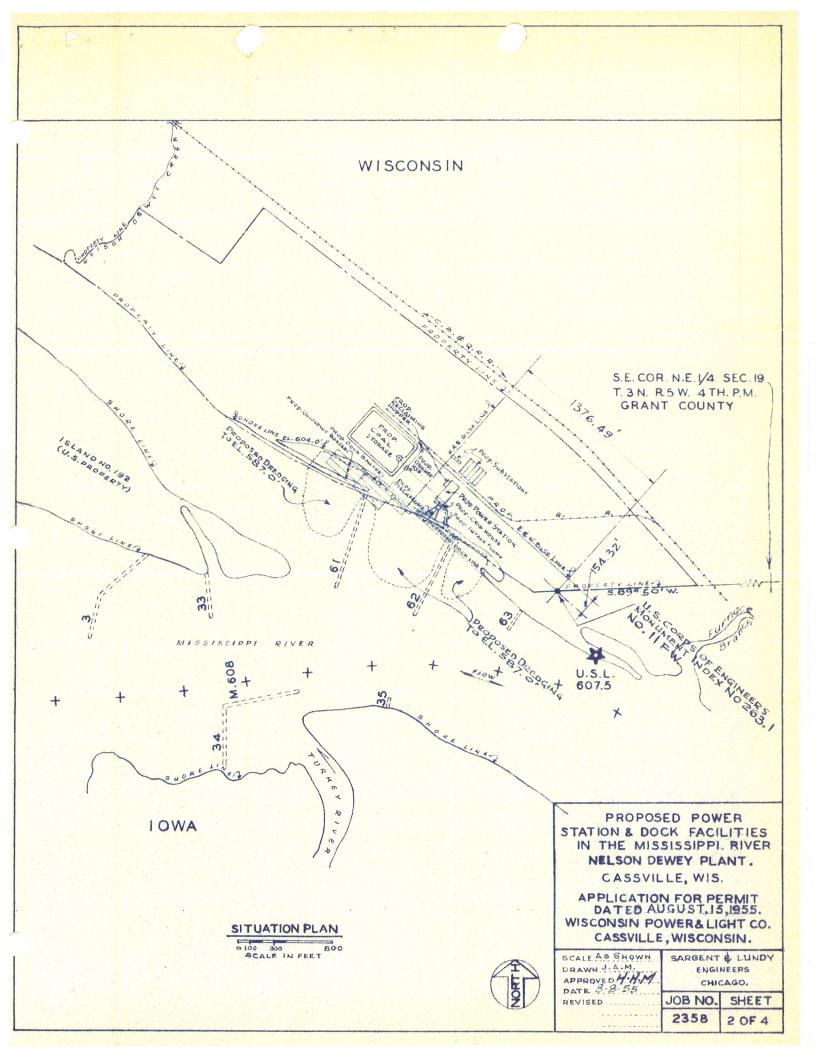
APPENDIX A – Proposed Power Station and Dock Facilities Drawings - 1955

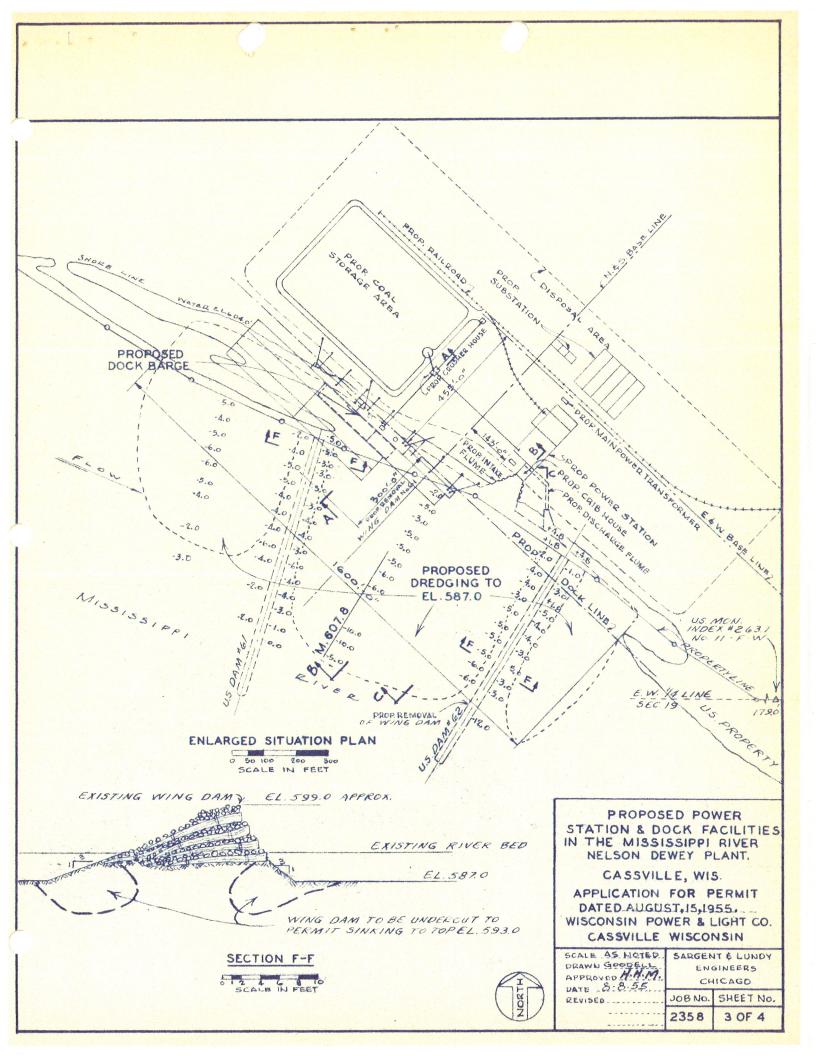
Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

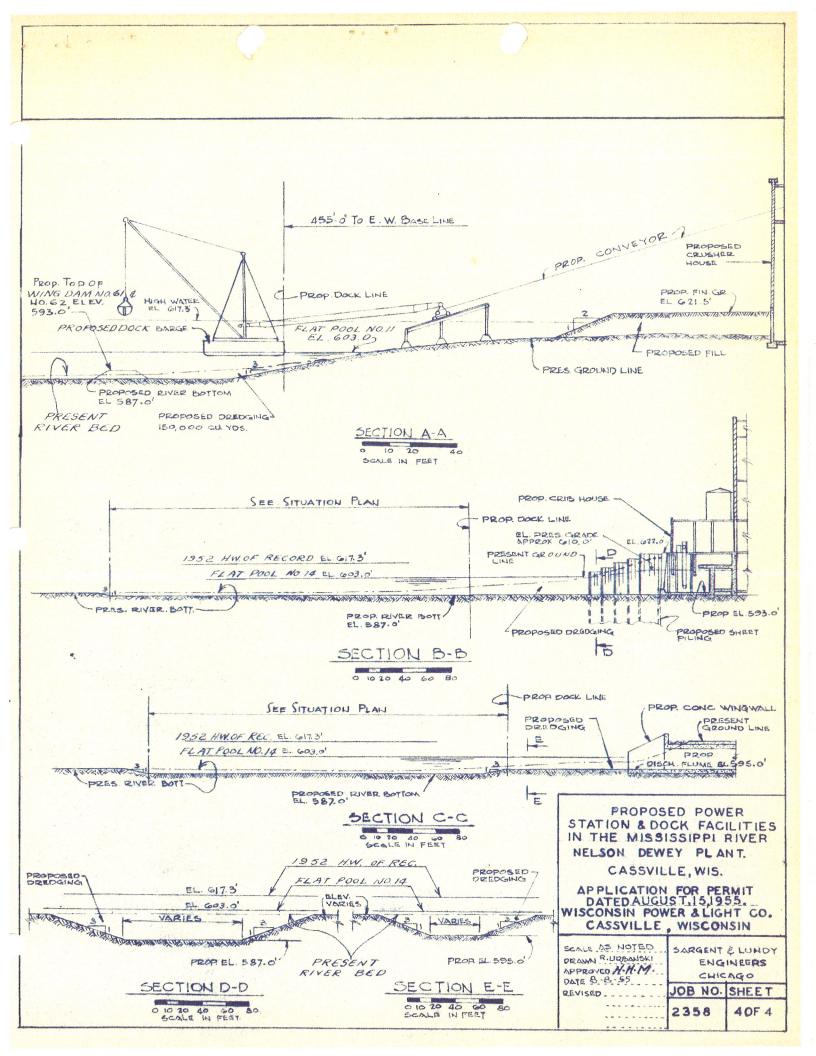
History of Construction











APPENDIX B – EDR Historical Aerial Photograph Package

Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

History of Construction



Nelson Dewey Generating Station

11999 County Highway VV Cassville, WI 53806

Inquiry Number: 4555570.12 March 08, 2016

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th Floor Shelton, Connecticut 06484 Toll Free: 800.352.0050 www.edrnet.com

EDR Aerial Photo Decade Package

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

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Thank you for your business. Please contact EDR at 1-800-352-0050 with any questions or comments.

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Date EDR Searched Historical Sources:

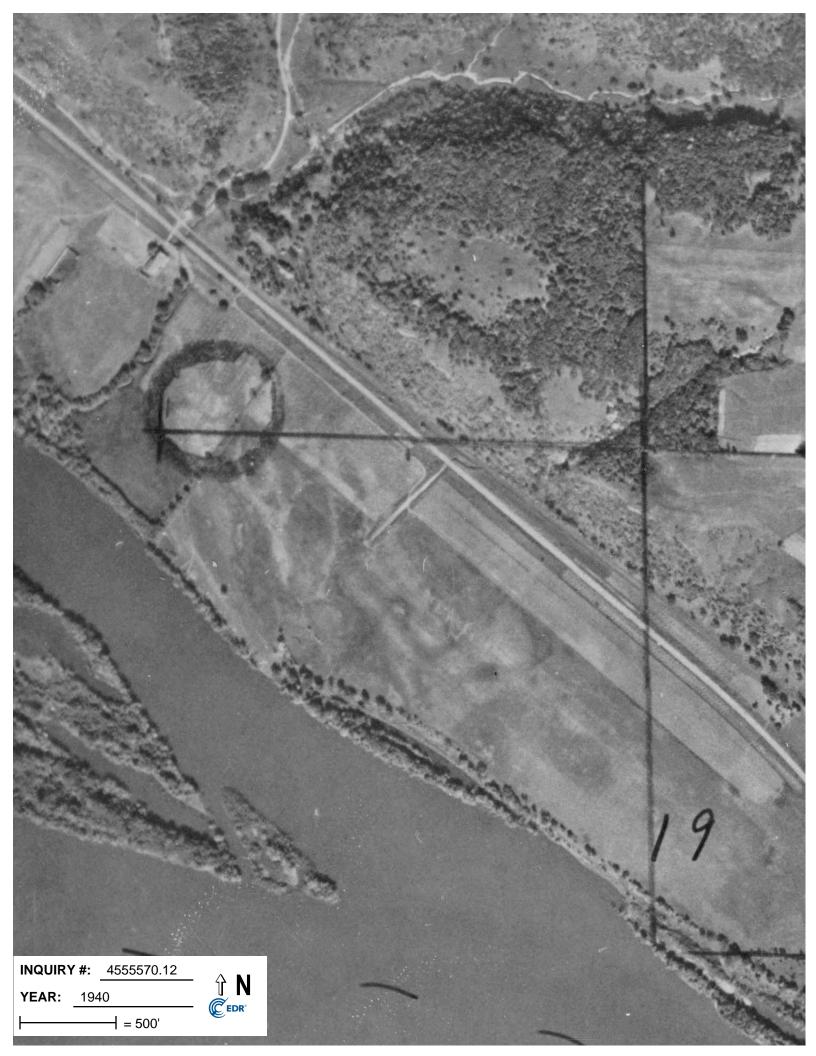
Aerial Photography March 08, 2016

Target Property:

11999 County Highway VV Cassville, WI 53806

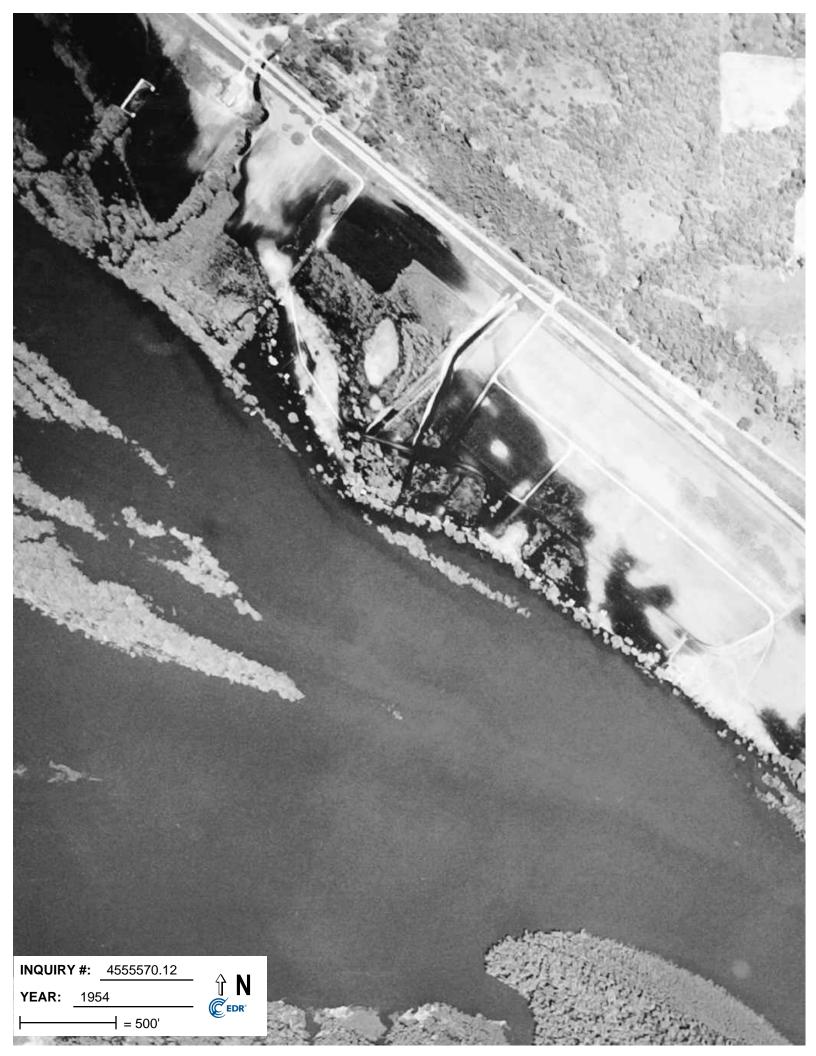
<u>Year</u>	Scale	<u>Details</u>	<u>Source</u>
1940	Aerial Photograph. Scale: 1"=500'	Flight Date: October 09, 1940	EDR
1940	Aerial Photograph. Scale: 1"=500'	Flight Date: October 09, 1940	EDR
1954	Aerial Photograph. Scale: 1"=500'	Flight Date: May 14, 1954	EDR
1954	Aerial Photograph. Scale: 1"=500'	Flight Date: May 14, 1954	EDR
1990	Aerial Photograph. Scale: 1"=750'	Flight Date: March 27, 1990	EDR
1994	Aerial Photograph. Scale: 1"=500'	DOQQ - acquisition dates: April 17, 1994	USGS/DOQQ
1994	Aerial Photograph. Scale: 1"=500'	DOQQ - acquisition dates: April 17, 1994	USGS/DOQQ
1999	Aerial Photograph. Scale: 1"=750'	Flight Date: April 25, 1999	EDR
2005	Aerial Photograph. Scale: 1"=500'	Flight Year: 2005	USDA/NAIP
2005	Aerial Photograph. Scale: 1"=500'	Flight Year: 2005	USDA/NAIP
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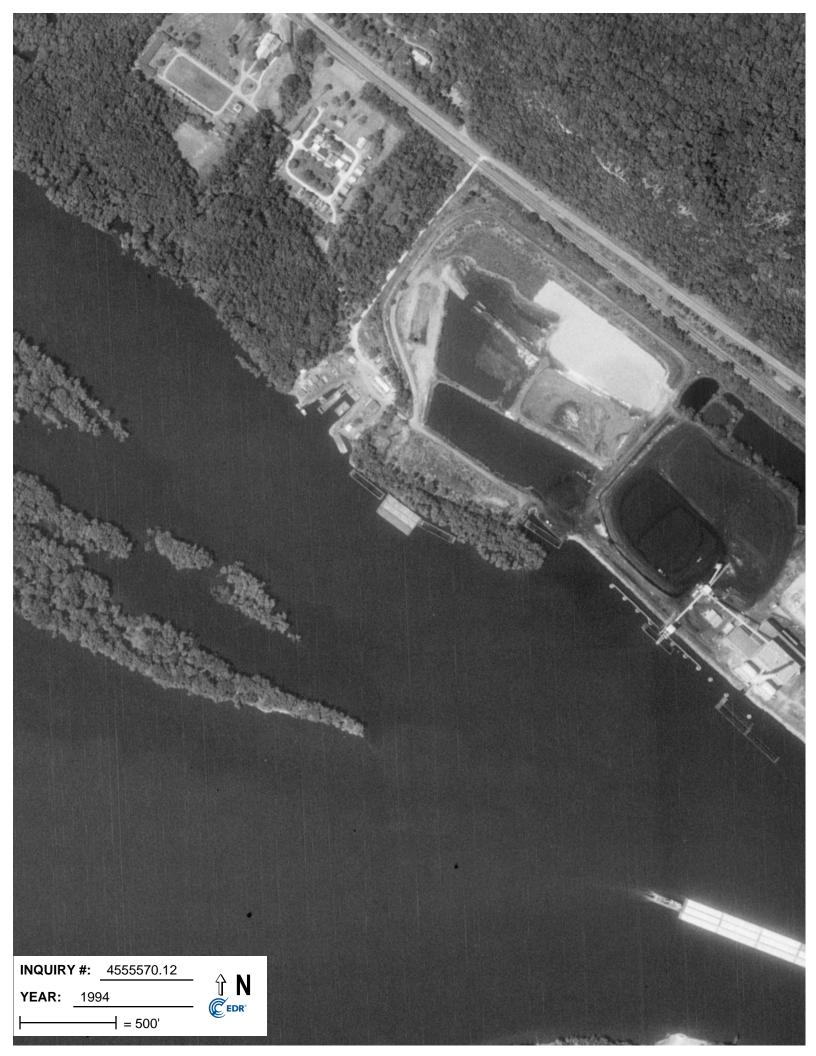






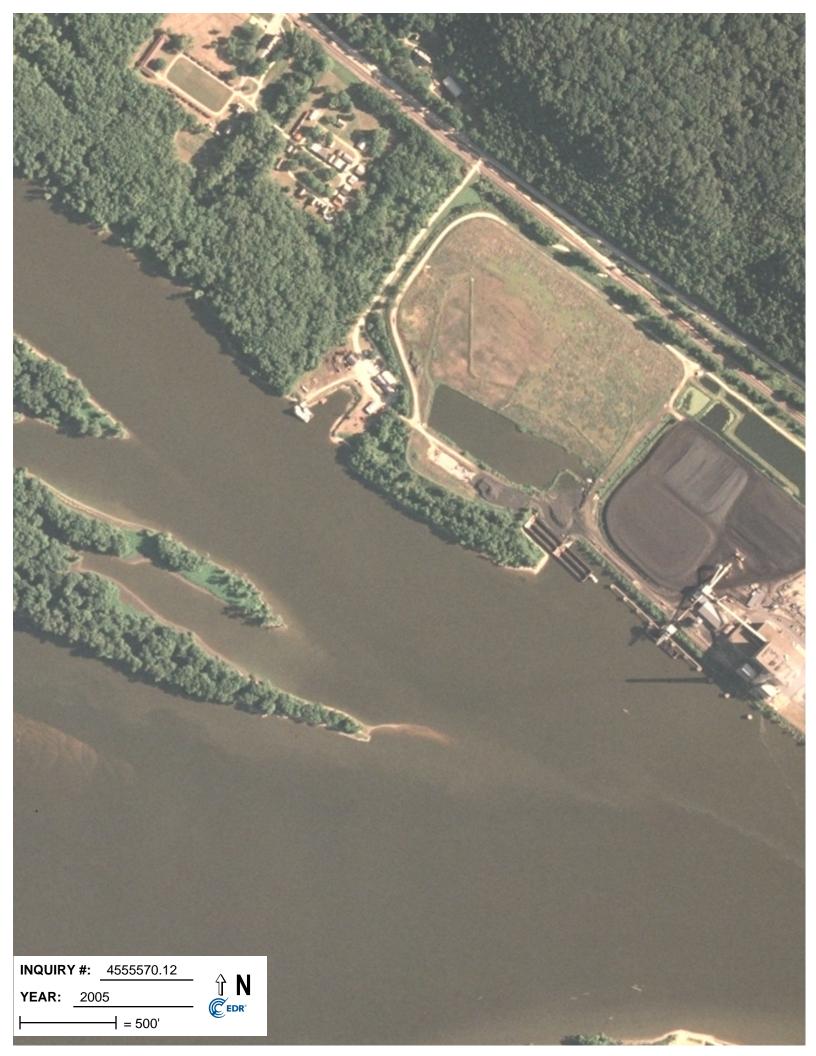






































APPENDIX C – EDR Historical Topographic Map Report

Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

History of Construction



Nelson Dewey Generating Station 11999 County Highway VV Cassville, WI 53806

Inquiry Number: 4555570.11 March 04, 2016

EDR Historical Topo Map Report with QuadMatch™



6 Armstrong Road, 4th floor Shelton, CT 06484 Toll Free: 800.352.0050 www.edrnet.com

EDR Historical Topo Map Report

Site Name:

Nelson Dewey Generating Stat 11999 County Highway VV Cassville, WI 53806 EDR Inquiry # 4555570.11

Client Name:

Environmental Site Assessors 932 North Wright Street, Suite 10 Naperville, IL 60563 Contact: Mark W Loerop



EDR Topographic Map Library has been searched by EDR and maps covering the target property location as provided by Environmental Site Assessors were identified for the years listed below. EDR's Historical Topo Map Report is designed to assist professionals in evaluating potential liability on a target property resulting from past activities. EDRs Historical Topo Map Report includes a search of a collection of public and private color historical topographic maps, dating back to the late 1800s.

Search Results: Coordinates:			
Site Name:	Nelson Dewey Generating Stat	Latitude:	42.723024 42° 43' 23" North
Address:	11999 County Highway VV	Longitude:	-91.008559 -91° 0' 31" West
City,State,Zip:	Cassville, WI 53806	UTM Zone:	Zone 15 North
P.O.#	154.018.012.007	UTM X Meters:	663048.92
Project:	NED Historical Docs	UTM Y Meters:	4731980.68
		Elevation:	620.00' above sea level

Maps Provided:

2013 1978, 1980 1955, 1957 1900, 1902

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Topo Sheet Thumbnails

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

2013 Source Sheets





Cassville 2013 7.5-minute, 24000

2013 7.5-minute, 24000

1978, 1980 Source Sheets





Cassville 1978 7.5-minute, 24000 Photo Inspected 1978 Aerial Photo Revised 1954

1980 7.5-minute, 24000 Photo Revised 1980 Aerial Photo Revised 1978

1955, 1957 Source Sheets





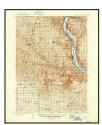
Cassville 1955 7.5-minute, 24000 Aerial Photo Revised 1954

1900, 1902 Source Sheets

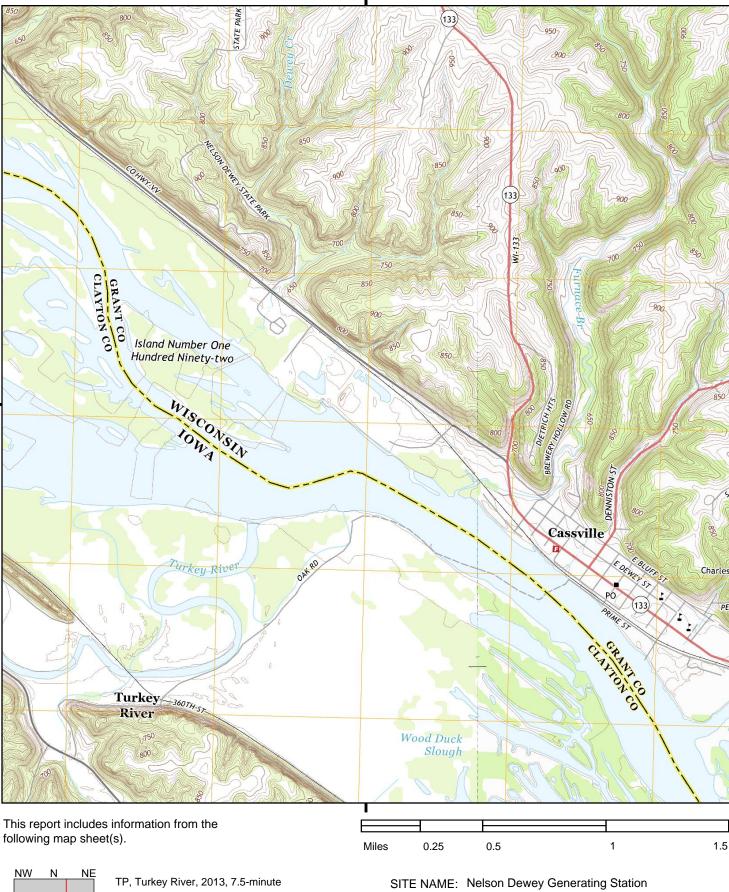
1957 7.5-minute, 24000 Aerial Photo Revised 1954



Lancaster 1900 30-minute, 125000



Elkader 1902 30-minute, 125000



SE, Cassville, 2013, 7.5-minute

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SW

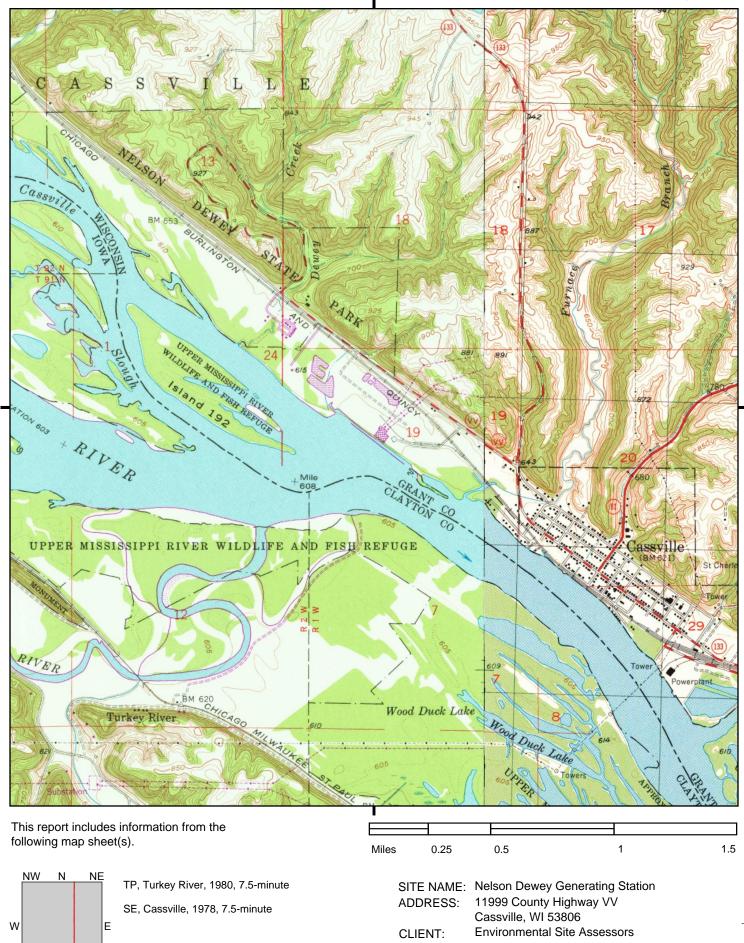
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OTE NAME.	Noison Dowey Contraining Station
ADDRESS:	11999 County Highway VV
	Cassville, WI 53806
CLIENT:	Environmental Site Assessors

2013

1978, 1980

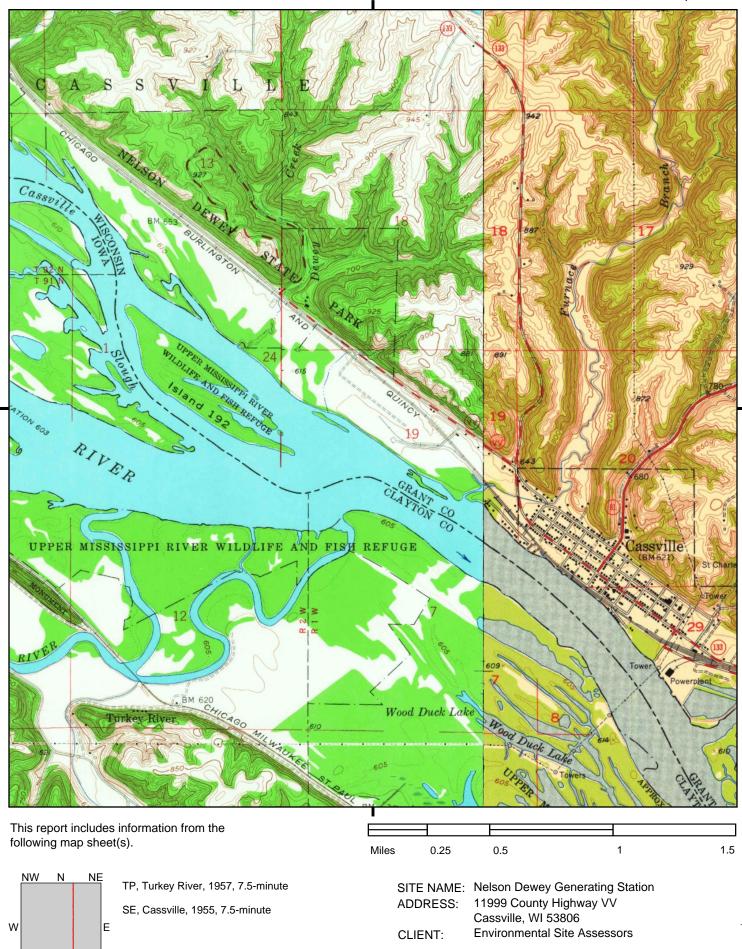


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1955, 1957

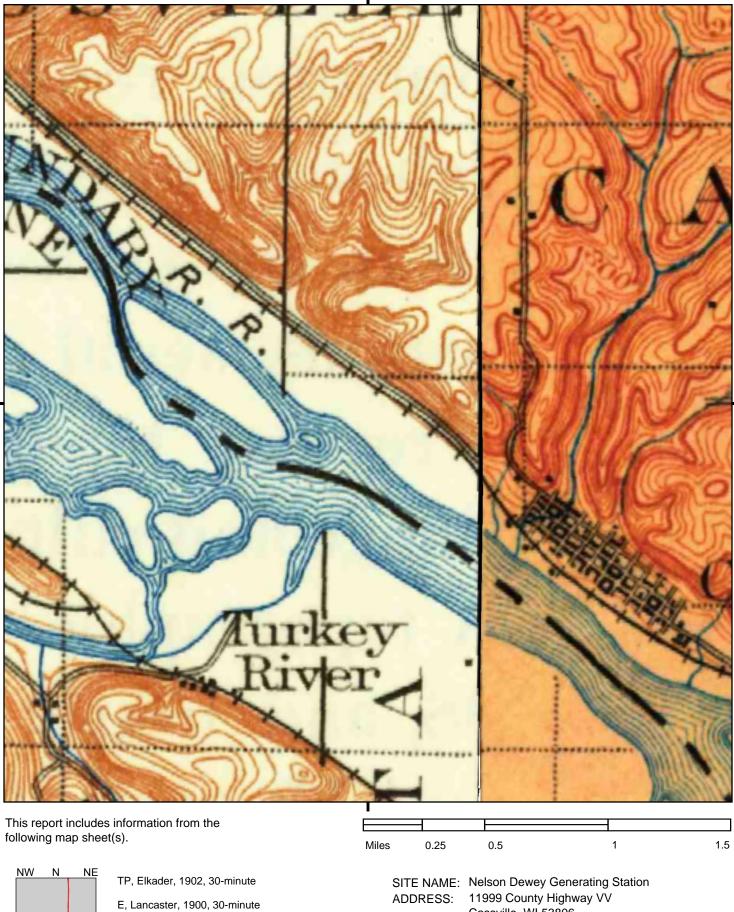


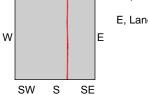
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1900, 1902





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Cassville, WI 53806

CLIENT:

Environmental Site Assessors

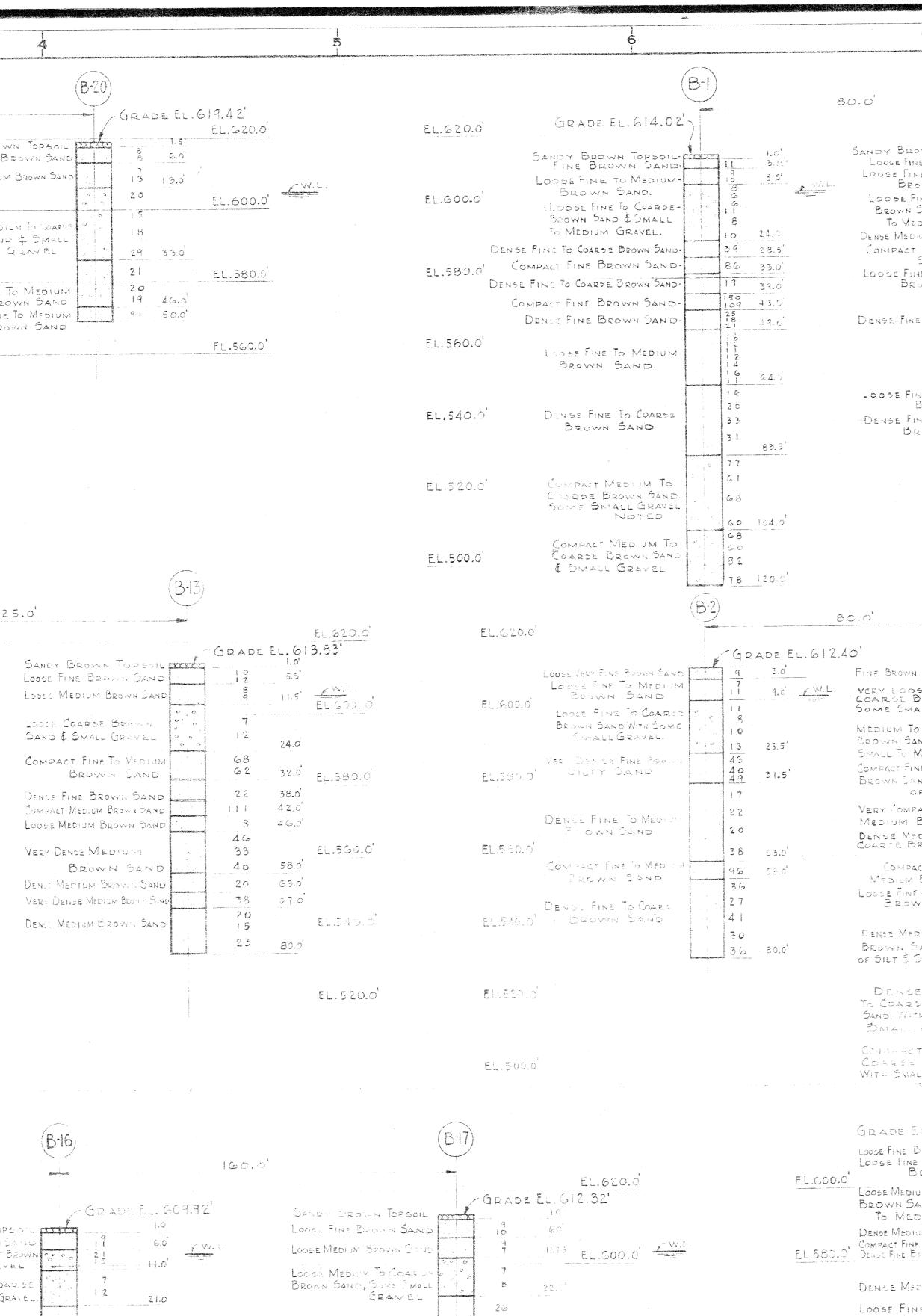
APPENDIX D – Soil Borings - 1957

Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

History of Construction

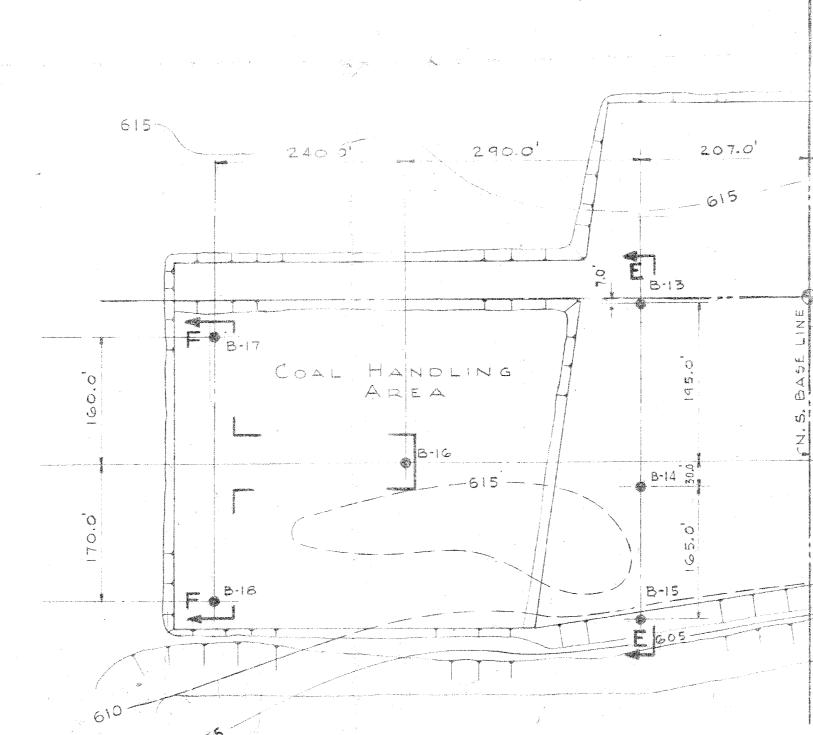


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a second to be

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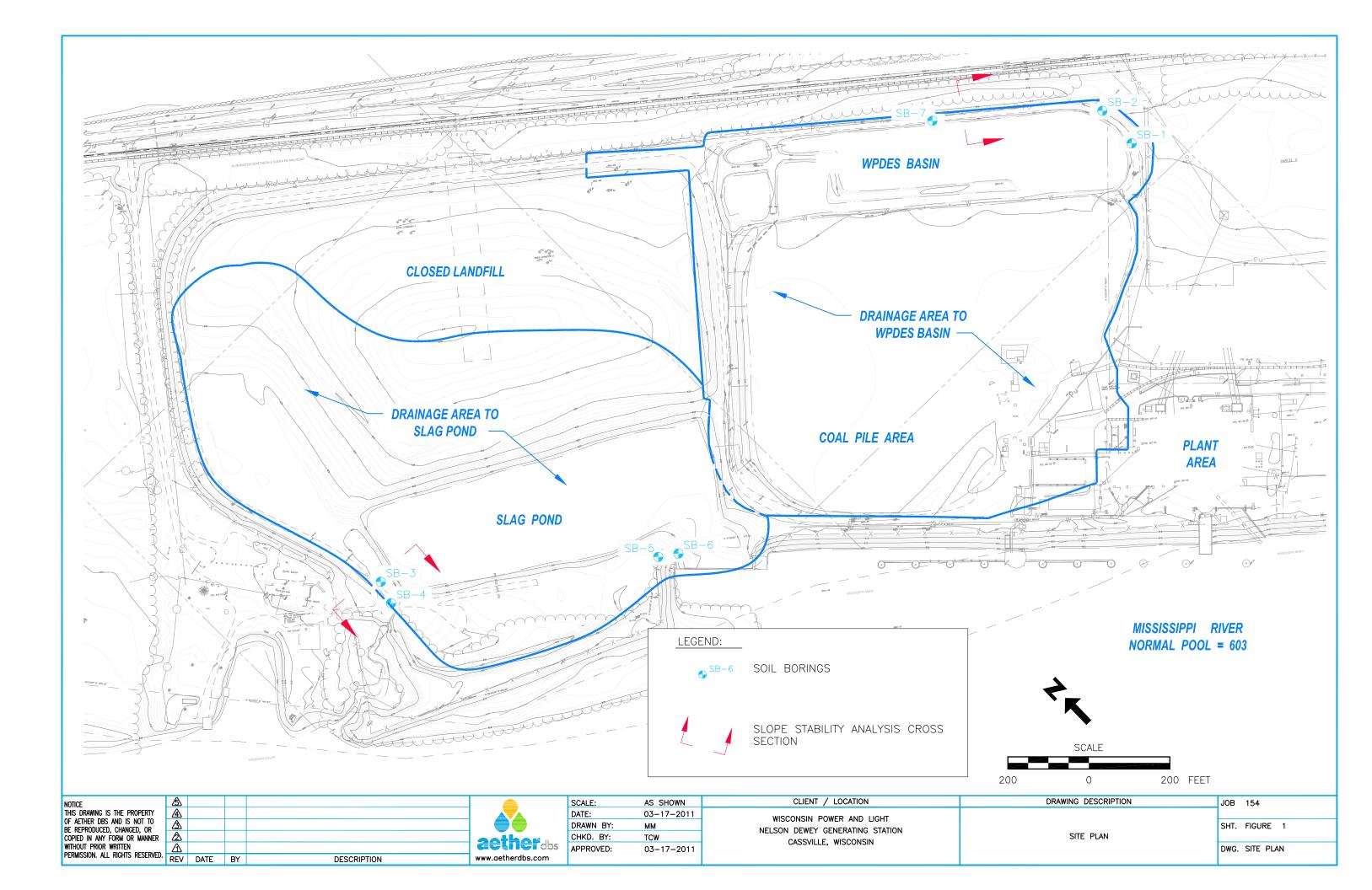
	8				
B-3	395.0		B-9	130.0	(B-12) EL.620.0
BROWN TOPSOL	L. 614.83'	SANDY BR	OWN 109 301 GETAN	GRADE EL. 620.80- 075' LOOSE FINE BROWN SAN 6.0'	10 11 9 8.5
FINE BROWN SAND FINE TO MEDIUM BROWN SAND E FINE TO MEDIUM 214 6		Loose Medi	for an and a start of the start	LOOSE MEDIUM BROWN DA	IN
NN SAND & SMALL 1. 13 MEDIUM GRAVEL 1. 10 23.0 IEDIUM BROWN SAND 23 23.1		SMALL C Loose Fin	IE TO MEDIUM	23.0' SAND & SMALL GRAVE DENSE FINE TO MEDIUN	<u> </u>
SILTY SAND 62 32.5 FURE TO MEDIUM 11 34.0 BROWN SAND 18		COMPACT FI BROW	NE O MEDIOM. 73	38.0' BROWN SAND 42.0' COMPACT FINE TO MEDI BROWN SAND	15 43.75
FINE BROWN Scorp 17		BROW Dense Fil	NE TO MEDIUM-	53.0 DENSE FINE TO MEDIUS BROWN SAND LOSSE FINE TO MEDIU BROWN SAND	B EL.560.0 -/
FINE TO MEDIUM		LOOSE FINE BROW	To MEDIUM - 12 IN DAND - 31	62.5' DROWN JAND GRO' DENSE FINE TO COARS BROWN BAND	26 17 EL.540.0
BROWN SAND 11 -2. FINE TO COARSE 17 BROWN SAND 33 80.		MEDIUM	BROWN SAND	e o.c'	28 28 28 93.0
				COMPACT FINE TO COAR BROWN SAND DENSE MEDIUM T COARSE BROWN SA	0
				COMPACT MEDIUM TO COARSE BROWN SAND V SOME SMALL GRAVEL	р – <u>1</u> 70 Улян – 74
(B-4)	SECTIO	N A-A	B-10		
	(TURBINE, 395.0 E EL. 613.60	· · · · · ·	NE BROWN SAND	EL. 620.63 EL. 620.0	
OWN SILTY SAND - 8			DIUM BROWN SAND	17.0' <u>X.1.</u> El.600.0'	
TO COARGE		BROWN S	BAND & SMALL & C 10 IRAVEL 14	2 1 33.0	
TO MEDIUM GRAVEL- 13 26.7 FINE TO MEDIUM 26 SAND, TRACE 22 35.5 OF SI-T- 35.5		Very Den Medium	BILTY SAND 30 BEFINE TO BROWN SAND 81	EL.580.0 43.0' 1 47.0'	
MPACT FINE TO 91 42.7 M BEOWN SAND 21 MEDIUM TO 12 BROWN SAND 12			NE BROWN BROWN	2 6 EL.560.0	
MPACT FINE TO 86 ET. MBEDWN SAND 8 CI.	0	DENSE	SANO	5	
MEDIUM TO COARSE 20			3	7	
SE MEDIUM 21	- 1	CHAPCE WITH S	MALL GRAVEL 4	6 3 102.0 EL.520.0	
хабе Варин 41 Мин Соме 22 103. - Салал 75	5	Brown SA Compact	W C C- Providence	6	
ACT MEDIUM TO 19 63 BE BEDUVN DAND 93 115. MALL TO MELIUMA 115. TORIANZEL REFUSA		DN B-B	SMALL GRAVEL Lamond	120.0' EL.500.0	·
E EL 612.53 (B-5)	332	ROOM)	D11) 13.0	GRADE EL. 610.08	
EDIUM TO COARSE . 9		LOOSE FINE TO N BROWN LONSE MELIUM TO	COARSE - 4	EL. 600.0	
ALDIUM GRAVELT 10 23. BOILM BROWN SAND 20 25. FINE BROWN SILTY SAND 85 28.	5	BROWN SAND WITH	4 SOME 10 21.0 GRAVEL 10 110 19	5 EL. 580.0	2007 1997 1997
и Валан Silty Sand 17 31. Иброим Враин Сано 46 34 41.	5'	DENSE FINE TO M	SAND .		
FINE TO MEDIUM 10 BROWN SAND- 8 ST FINE TO MEDIUM 90	5	COMPACT MEDIUM BR	OWN SAND 73 52.0	<u>c</u> t. 360.0	
BROWN SAND 10 57. FINE TO COARSE 18 BROWN SAND 33		DENSE MEDIUM BE Compact Medium B	20WN 5440 27 63	5	
28 80.		DENSE MELIUM I BROWN SAND SO GRAVE			************************************
	SECT	ON C-C		1. BORINGO B-G, B-7, #	TES B-8 (INDICATED THUS +) LLED FOR, BUT NOT MADE
		HOUSE).		IN THE FIELD AT THE DIA 2. FIGURES IMMEDIATE	TO THE RIGHT OF THE TO THE RIGHT OF THE THE OF BLOWS REQUIRED SAMPLING SPOON 12 INCHES
		· ·			
143.0' 220.0'_			~		
B. 19	D1 B-20			REFERENCE M-2-DEVELOPMENT PI	
	95.0' BASE LINE				
	46°-35'W	BIZA			
B-1 B-3	C-13		REVISIONS 1-25-57 NLR DOCKGELL 3-15-57 PILING 5-29-57 NLR PILING 6	LOCATION PL	BORINGS
- В в·2 В·4	B-7 B-10 B		7-1-57 BUILDING 8-26-57 BLOG, CONT 6-1-60 BUILDING B A CONTRACT BIL A CONT	WISCONSIN PO	WER & LIGHT CO.
C B 5	B-8B II	605	Carter Carter	CASSVILLE	SARGENT & LUNDY
610-	RIVER	(Parting		DRAWN W. EHRENWERTH DATE JANUARY 25, 1957 CHECKED NIL RABBERS	ENGINEERS
M1351351	PPI	DIAN		JOB NO. JOB NO. JOB NO. JOB NO.	DRAWING NO.
	LOGA TION SCALE: 1"=1	20 ¹		2916	<u> </u>
1					

APPENDIX E – Geoprobe Soil Borings -2011

Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

History of Construction







BORING LOG

CLIENT: Aether dbs

N NOT SURVEYED COORDINATES: E NOT SURVEYED

BORING NO.: SB1

PROJECT:Cassville, WI

Envi	ronm	nento	al Field Serv	vices, LLC	PROJECT	Г:Cassvi	lle, WI	BORING NO.: 2 page	SB1 e l of l
DEPTH TO WATER WHILE DRILLING	SAMPLE NO. AND TYPE	SAMPLE RECOVERY	SAMPLE INFROMATION	POCKET PENETROMETER (TSF)	CONSISTENCY vs. DEPTH	DEPTH IN FEET	PROFILE	LOGGED BY: John Noyes EDITED BY: John Noyes CHECKED BY: Mark Loerop DATE BEGAN: 02-24-11 DATE FINISHED: 02-24-11 GROUND SURFACE ELEVATION: DESCRIPTION	

	· · · · · · · · · · · · · · · · · · ·		1 1 1 - 1	
				GRAVEL; yellowish-brown; well graded; fine to coarse grained; wet/frozen. (Fill)
	SP1	4.5'/5'		SAND; yellowish brown to orange; poorly graded; fine grained; moist; some silt & clay. (SP)
	SP2	4'/5'		
∇			1.5	CLAY; black; low to high plasticity; moist; 10
~	SP3	3.8'/5'	2.0	SAND; brown; poorly graded; fine grained; wet; trace to some silt. (SP)
		2.5'/2.5'		 -15 @ 15.5' grades well graded; fine to coarse grained. (SW) @ 16' grades very loose, flowing sand like consistency.
	SP4			Bottom of boring @ 17.5'.
				Boring advanced W/ Geoprobe Model 6610DT using 60-inch Macrocore sampling system. Boring backfilled to groundsurface w/ bentonite chips of 2-24-11.



Environmental Field Services, LLC

BORING LOG

CLIENT: Aether dbs

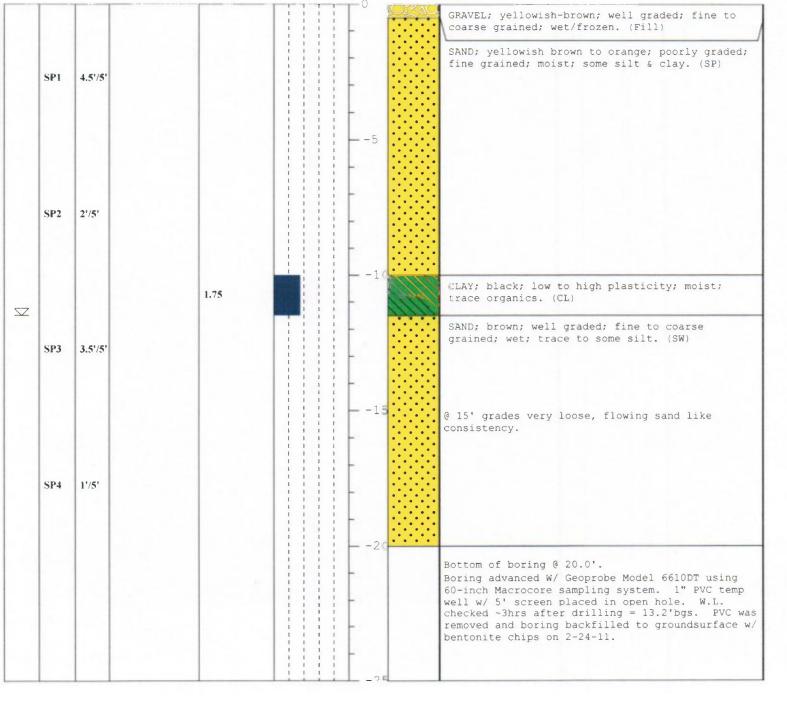
PROJECT:Cassville, WI

COORDINATES: *N NOT SURVEYED*

BORING NO.: SB2

page 1 of 1

WHILE DRILLING SAMPLE NO. ND TYPE	SAMPLE RECOVERY	SAMPLE INFROMATION	POCKET PENETROMETER (TSF)	CONSISTENCY vs. DEPTH	DEPTH IN FEET	PROFILE	LOGGED BY: John Noyes EDITED BY: John Noyes CHECKED BY: Mark Loerop DATE BEGAN: 02-24-11 DATE FINISHED: 02-24-11 GROUND SURFACE ELEVATION: DESCRIPTION	
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CLIENT: Aether dbs

COORDINATES: *N NOT SURVEYED*

BORING NO.: SB3

Environmental Field Services, LLC PROJECT: Cassville, WI

		r						
DEPTH TO WATER WHILE DRILLING	SAMPLE NO. AND TYPE	SAMPLE RECOVERY	SAMPLE INFROMATION	POCKET PENETROMETER (TSF)	CONSISTENCY vs. DEPTH	DEPTH IN FEET	PROFILE	LOGGED BY: John Noyes EDITED BY: John Noyes CHECKED BY: Mark Loerop DATE BEGAN: 02-24-11 DATE FINISHED: 02-24-11 GROUND SURFACE ELEVATION: DESCRIPTION
	SP1	2.5'/5'				- - -		<pre>GRAVEL; yellowish-brown; well graded; fine to coarse grained; wet/frozen. (Fill) ASH (slag-); black; well graded; fine to coarse grained; angulat to sub-angular; dry to moist. (Fill)</pre>
	SP2	4'/5'				5		
	SP3	5'/5'				10 - - - -		
	SP4	5'/5'				20		SAND; gray; poorly graded; fine grained; wet; trace silt. (SP)
						-		Bottom of boring @ 20.0'. Boring advanced W/ Geoprobe Model 6610DT using 60-inch Macrocore sampling system. Backfilled to groundsurface w/ bentonite chips on 2-24-11.



CLIENT: Aether dbs

PROJECT:Cassville, WI

COORDINATES: *N NOT SURVEYED*

Environmental Field Services, LLC

BORING NO.: SB4

DEPTH TO WATER WHILE DRILLING	SAMPLE NO. AND TYPE	SAMPLE RECOVERY	SAMPLE INFROMATION	POCKET PENETROMETER (TSF)	CONSISTENCY vs. DEPTH	DEPTH IN FEET	PROFILE	LOGGED BY: John Noyes EDITED BY: John Noyes CHECKED BY: Mark Loerop DATE BEGAN: 02-24-11 DATE FINISHED: 02-24-11 GROUND SURFACE ELEVATION: DESCRIPTION
						-0		GRAVEL; yellowish-brown; well graded; fine to coarse grained; wet/frozen. (Fill)
	SP1 SP2	2.5'/5' 4'/5' 5'/5'				- - - - - - - - - - - - -		ASH (slag-); black; well graded; fine to coarse grained; angulat to sub-angular; dry to moist. (Fill)
SZ						15		
	SP4	5'/5'				20		SAND; gray; poorly graded; fine grained; wet; trace silt and organic matter. (SP)
								Bottom of boring @ 20.0'. Boring advanced W/ Geoprobe Model 6610DT using 60-inch Macrocore sampling system. 1" PVC temp well w/ 5' screen placed in open hole. W.L. checked ~1hr after drilling = dry. PVC was removed and boring backfilled to groundsurface w/ bentonite chips on 2-24-11.



CLIENT: Aether dbs

PROJECT:Cassville, WI

COORDINATES: *N NOT SURVEYED*

Environmental Field Services, LLC

BORING NO.: SB5

DEPTH TO WATER WHILE DRILLING	SAMPLE NO. AND TYPE	SAMPLE RECOVERY	SAMPLE INFROMATION	POCKET PENETROMETER (TSF)	CONSISTENCY vs. DEPTH	DEPTH IN FEET	PROFILE	LOGGED BY: John Noyes EDITED BY: John Noyes CHECKED BY: Mark Loerop DATE BEGAN: 02-24-11 DATE FINISHED: 02-24-11 GROUND SURFACE ELEVATION: DESCRIPTION
	SP1	3'/5'						ASH (slag-); black; well graded; fine to coarse grained; angulat to sub-angular; dry to moist. (Fill)
	SP2	3'/5'				- - 10		
∇	SP3	4'/5'				- - 15		
	SP4	5'/5'				- 		<pre>SAND; brown; poorly graded; fine grained; wet; trace silt and organic matter. (SP) Bottom of boring @ 20.0'. Boring advanced W/ Geoprobe Model 6610DT using 60-inch Macrocore sampling system. Boring backfilled to groundsurface w/ bentonite chips on 2-24-11.</pre>



CLIENT: Aether dbs

COORDINATES: *N NOT SURVEYED*

Environmental Field Services, LLC PROJECT: Cassville, WI

BORING NO.: SB6

DEPTH TO WATER WHILE DRILLING	SAMPLE NO. AND TYPE	SAMPLE RECOVERY	SAMPLE INFROMATION	POCKET PENETROMETER (TSF)	CONSISTENCY vs. DEPTH	DEPTH IN FEET	PROFILE	LOGGED BY: John Noyes EDITED BY: John Noyes CHECKED BY: Mark Loerop DATE BEGAN: 02-24-11 DATE FINISHED: 02-24-11 GROUND SURFACE ELEVATION: DESCRIPTION
	SP1	3'/5'				5		ASH (slag-); black; well graded; fine to coarse grained; angulat to sub-angular; dry to moist. (Fill)
	SP2	3'/5'				10		
	SP3	3'/5'				15		
	SP4	5'/5'				2 0-		<pre>SAND; brown; poorly graded; fine grained; wet; trace silt and organic matter. (SP) Bottom of boring @ 20.0'. Boring advanced W/ Geoprobe Model 6610DT using 60-inch Macrocore sampling system. Boring backfilled to groundsurface w/ bentonite chips on 2-24-11.</pre>
								2-24-11.



CLIENT: Aether dbs

PROJECT:Cassville, WI

N NOT SURVEYED COORDINATES: E NOT SURVEYED

BORING NO.: SB7

Environmental Field Services, LLC

DEPTH TO WATER WHILE DRILLING	SAMPLE NO. AND TYPE	SAMPLE RECOVERY	SAMPLE INFROMATION	POCKET PENETROMETER (TSF)	CONSISTENCY VS. DEPTH	DEPTH IN FEET	PROFILE	LOGGED BY: John Noyes EDITED BY: John Noyes CHECKED BY: Mark Loerop DATE BEGAN: 02-24-11 DATE FINISHED: 02-24-11 GROUND SURFACE ELEVATION: DESCRIPTION
	SPI	2'/5'				5		GRAVEL; yellowish-brown; well graded; fine to coarse grained; wet/frozen. (Fill) ' SILT; black to dark gray; non-plastic; trace to some sand, gravel & slag. (Fill)
	SP2	5'/5'				1 C		
	SP3	4'/5'		2.25 2.25 2.0		- - - 15		CLAY; brown; low to high plasticity; stiff; moist. (CL) SAND; reddish orange; well graded; fine to coarse grained; wet; some gravels. (SW)
	SP4	1'/5'				- - - - - -		Bottom of boring @ 20.0'. Boring advanced W/ Geoprobe Model 6610DT using 60-inch Macrocore sampling system. Boring backfilled to groundsurface w/ bentonite chips on 2-24-11.

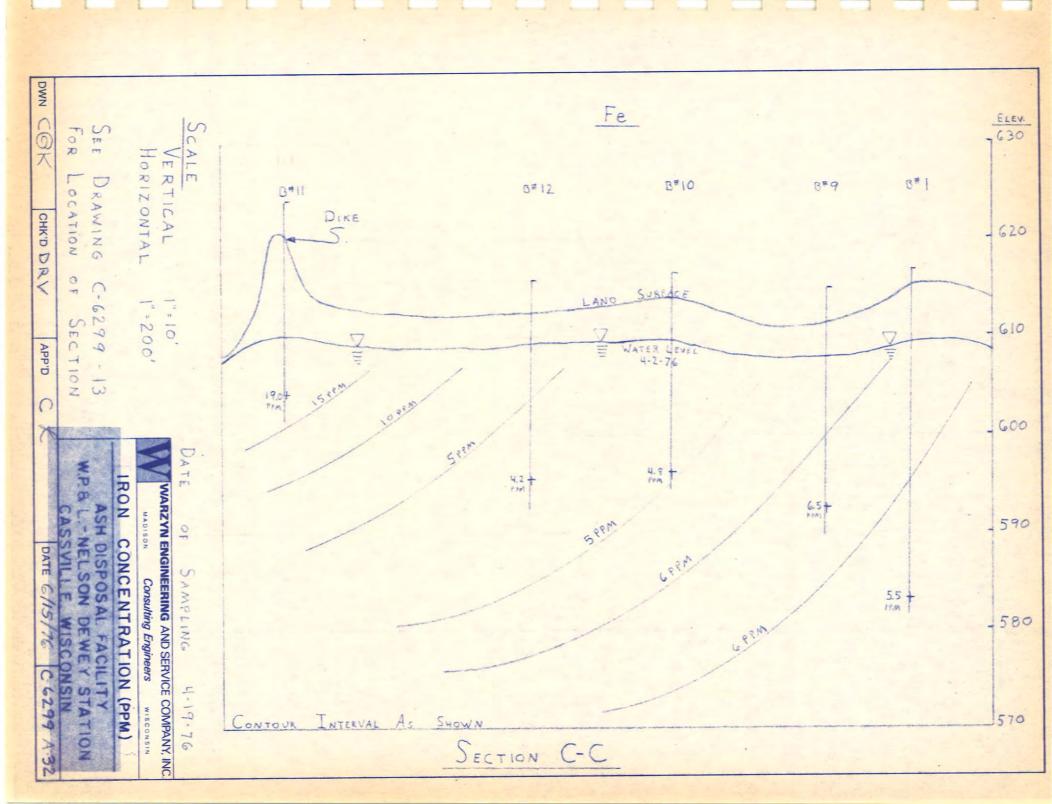
APPENDIX F – NED Slag Pond Drawings

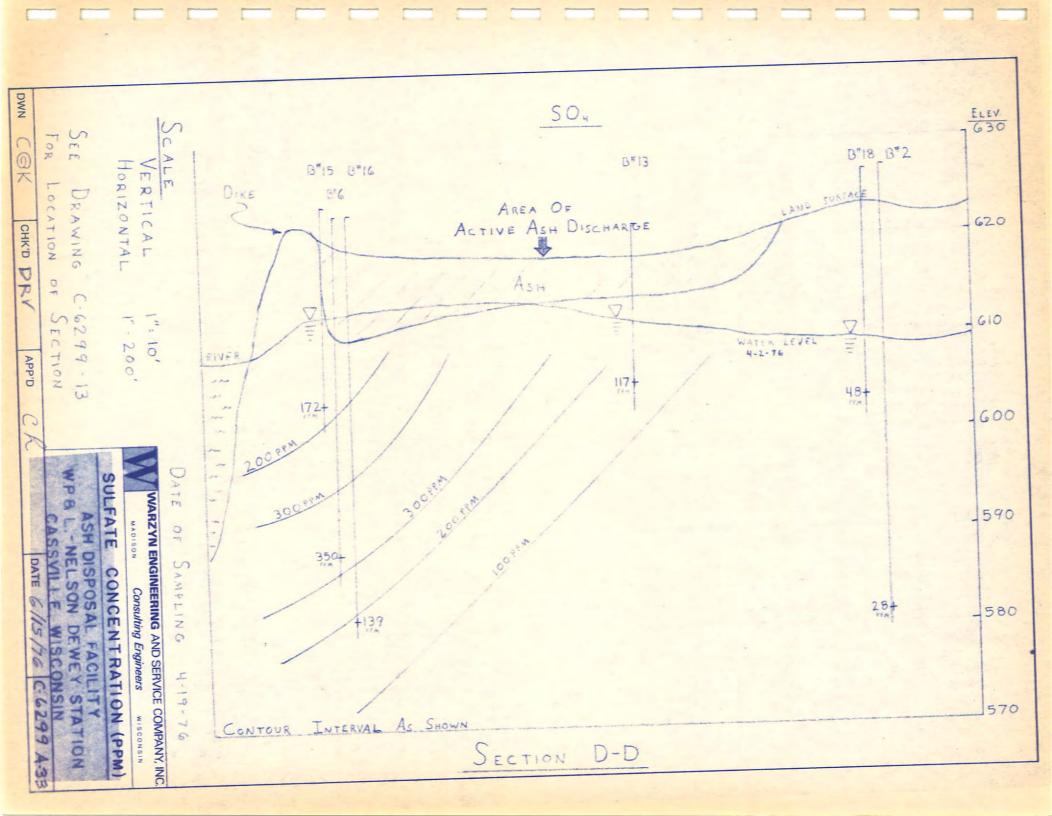
Alliant Energy Wisconsin Power and Light Company Nelson Dewey Generating Station Cassville, Wisconsin

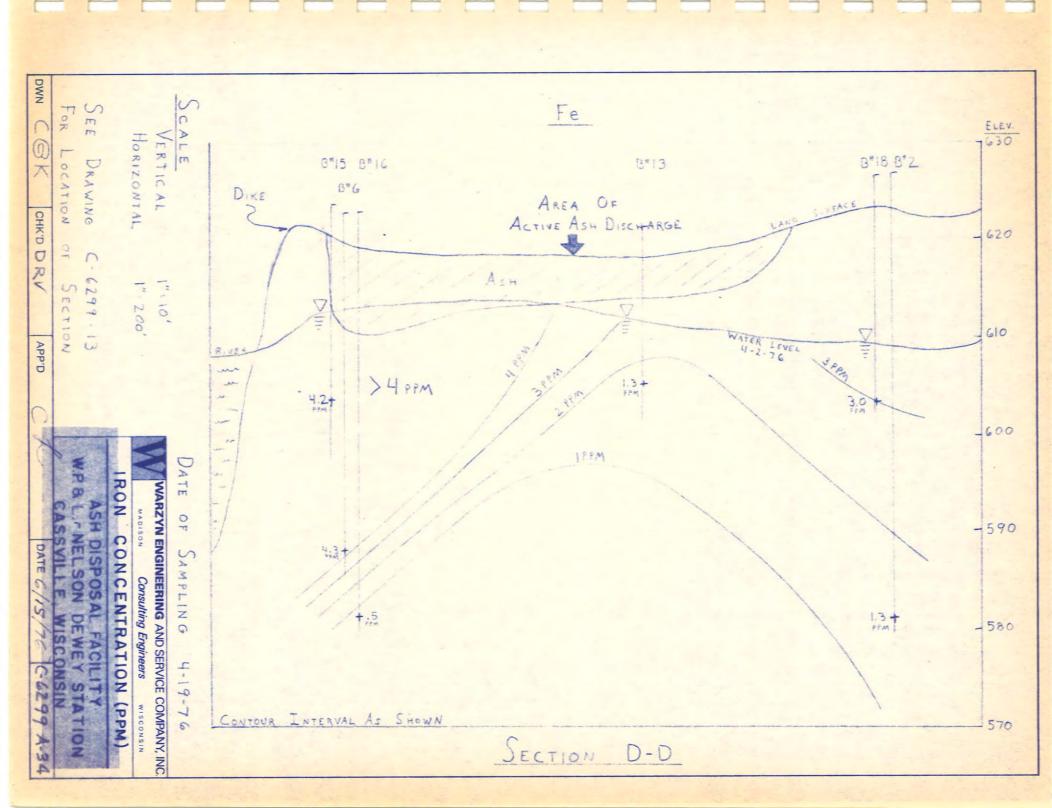
History of Construction

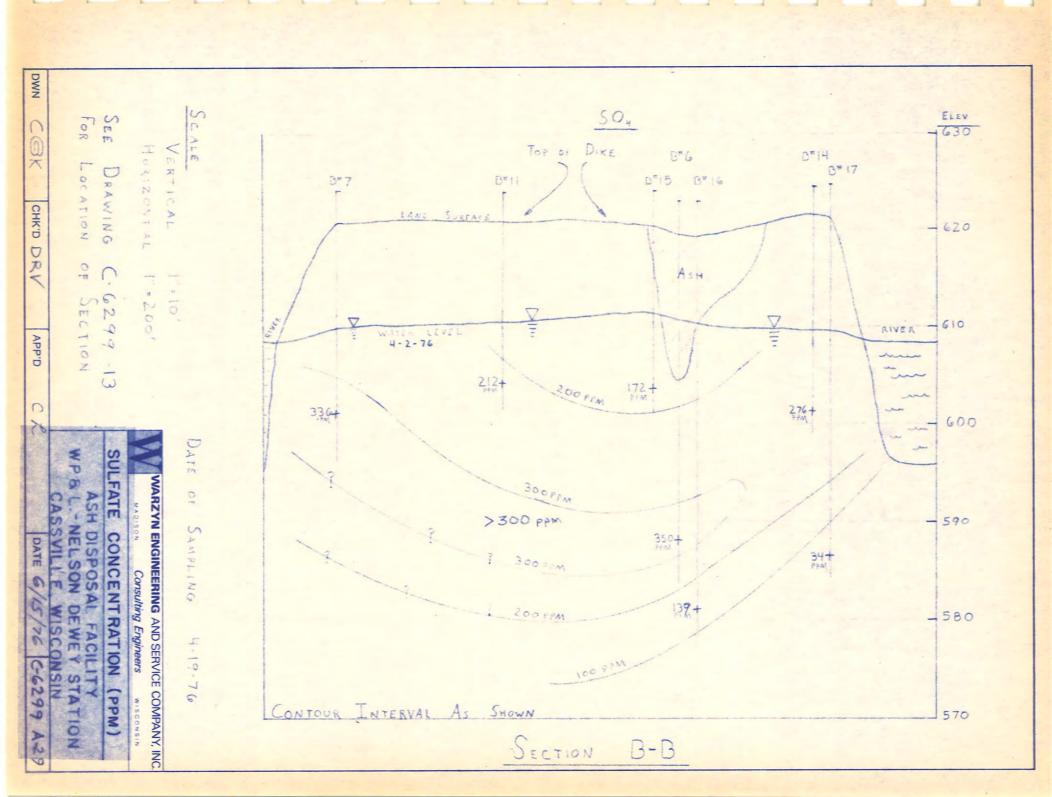


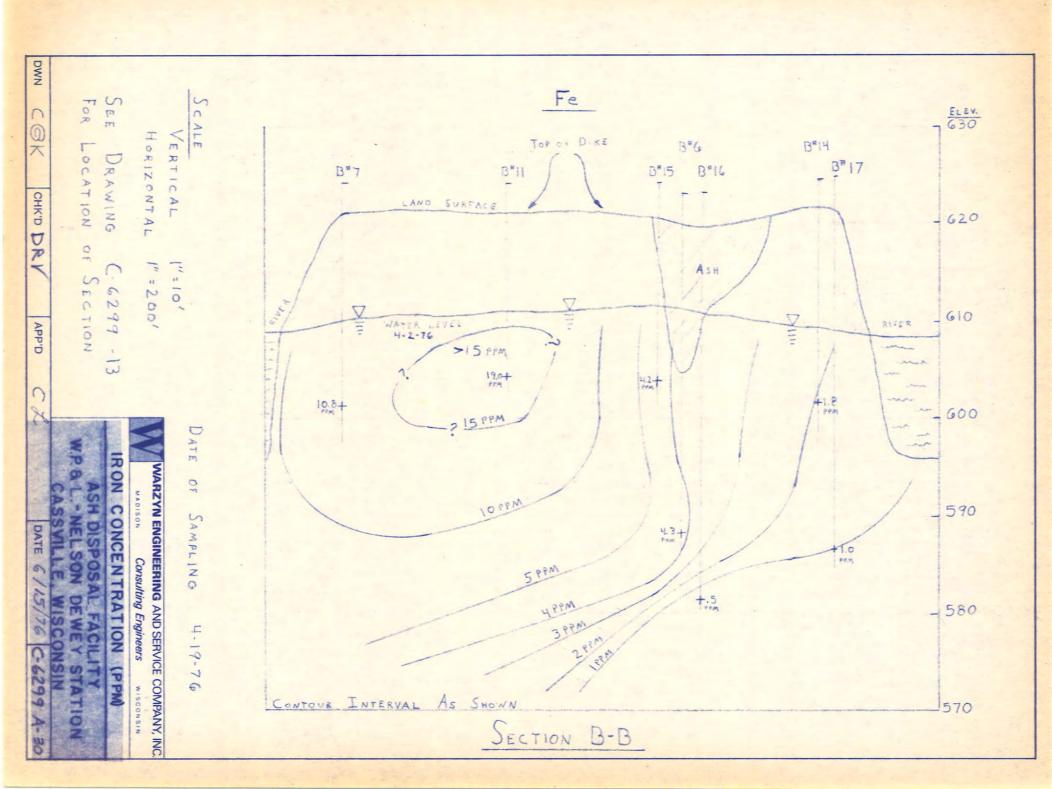


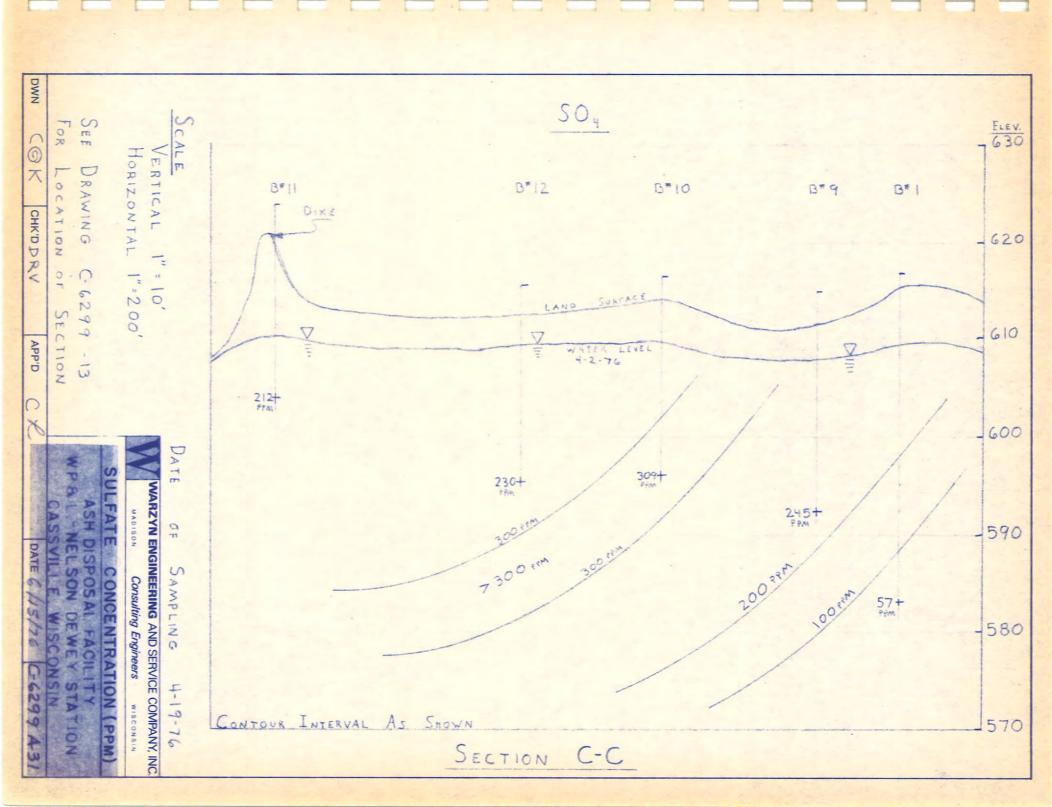


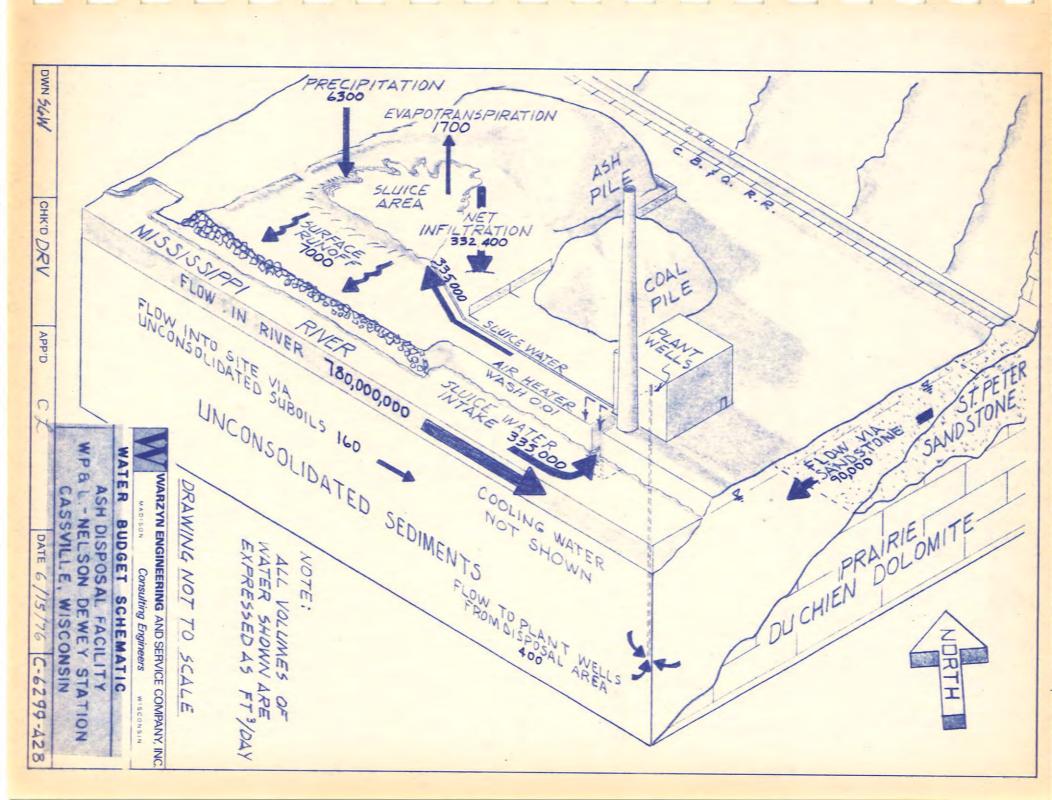


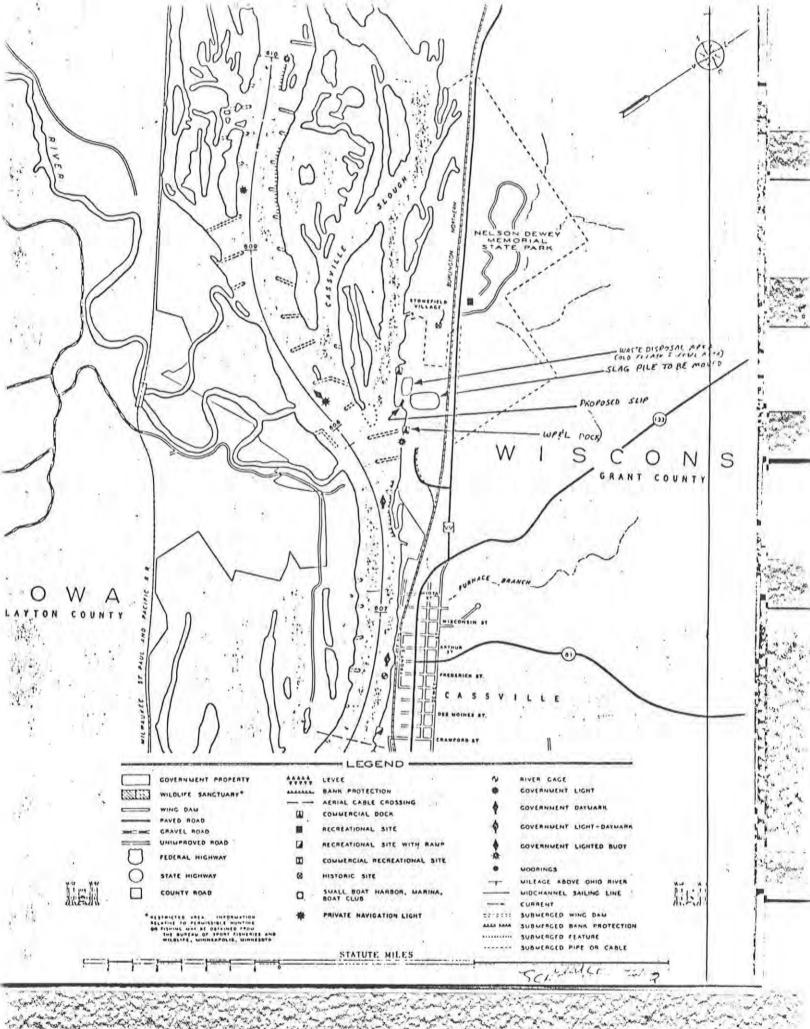






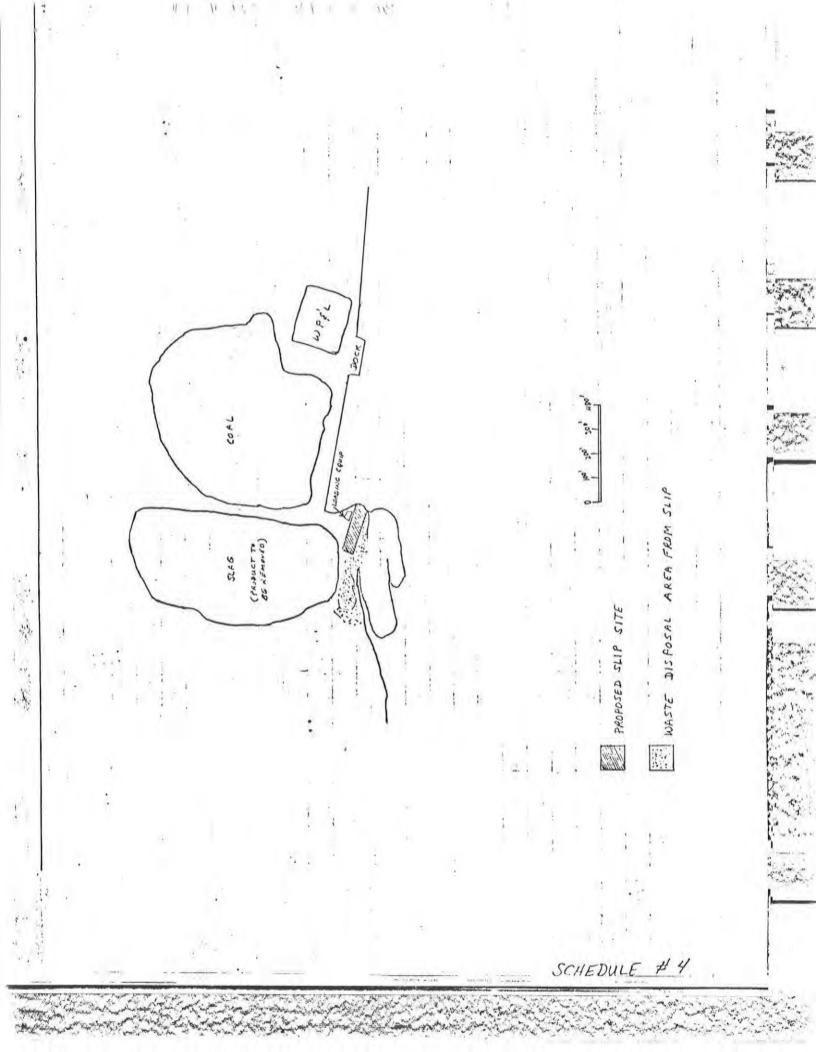


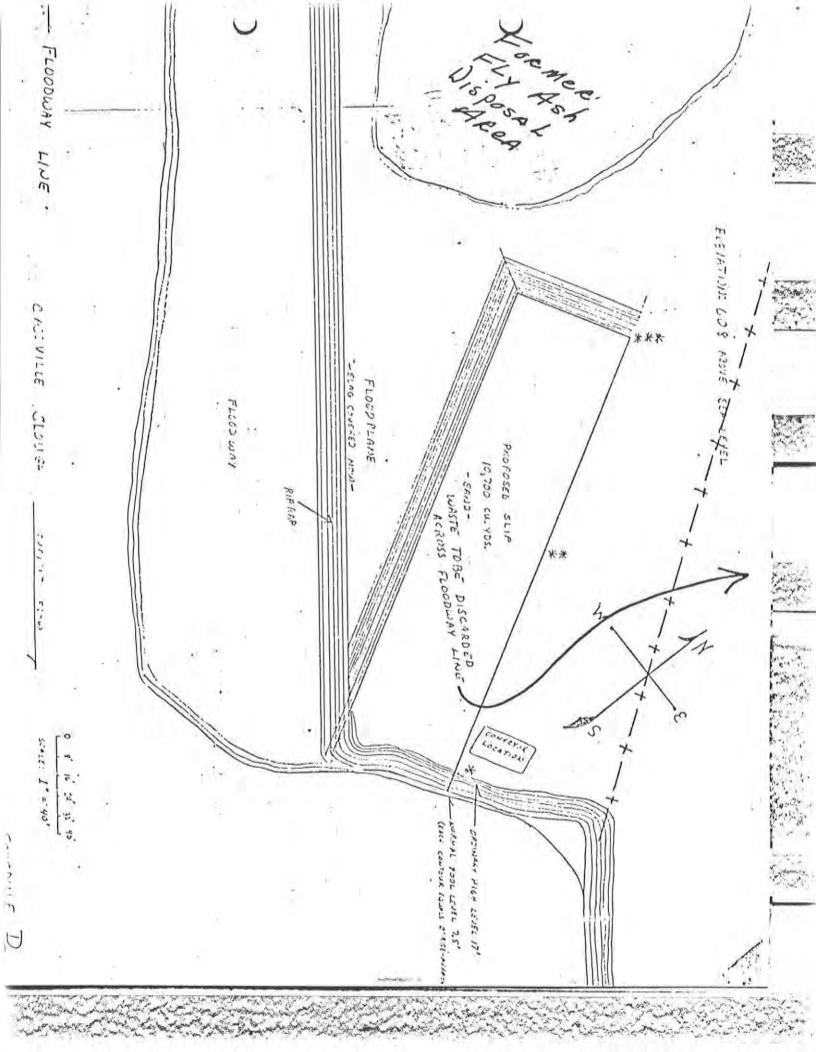


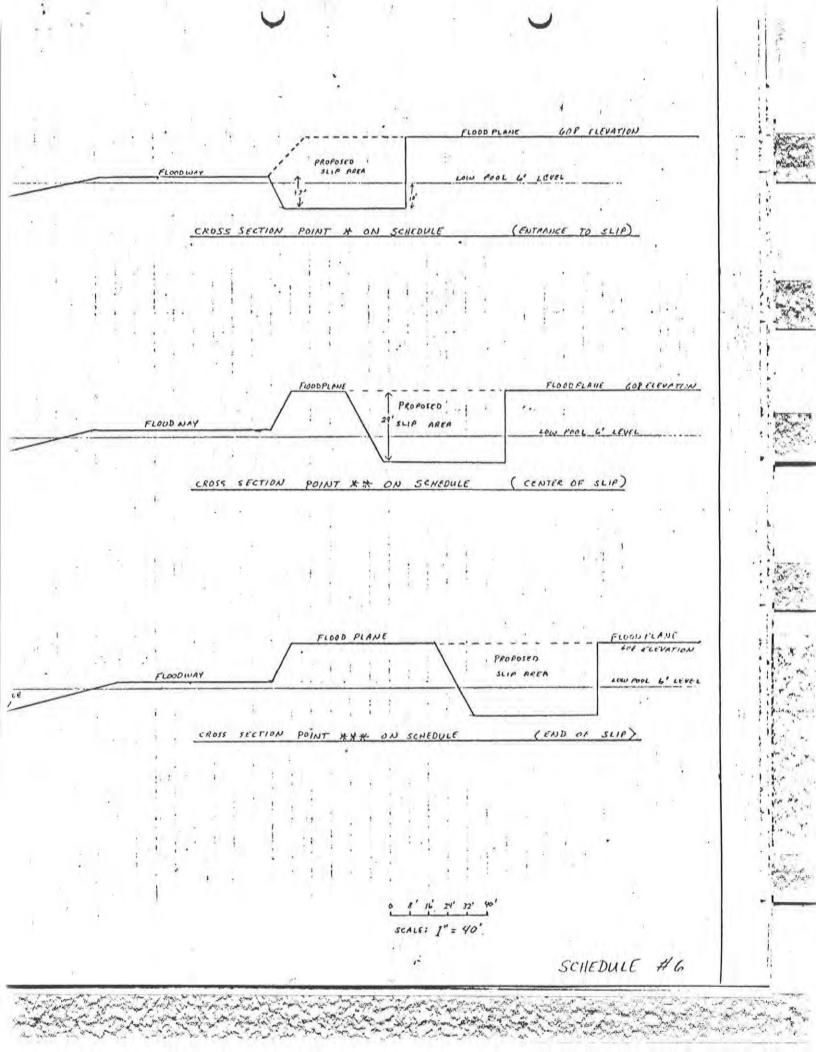


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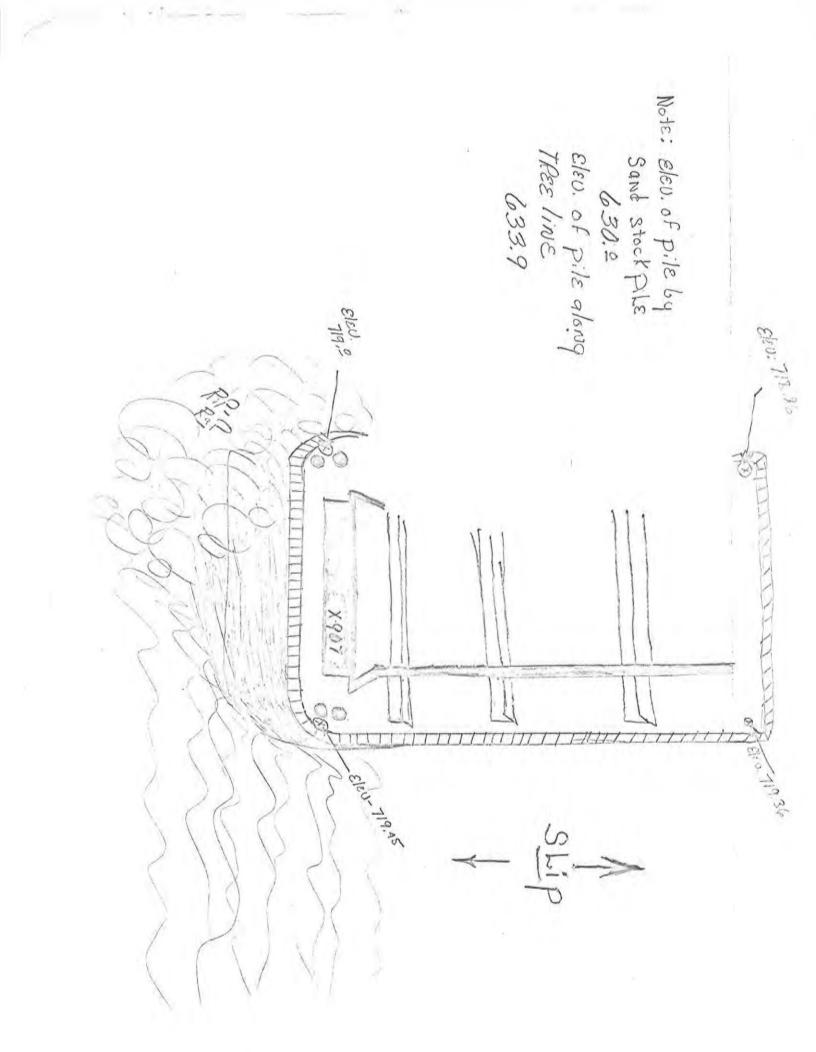
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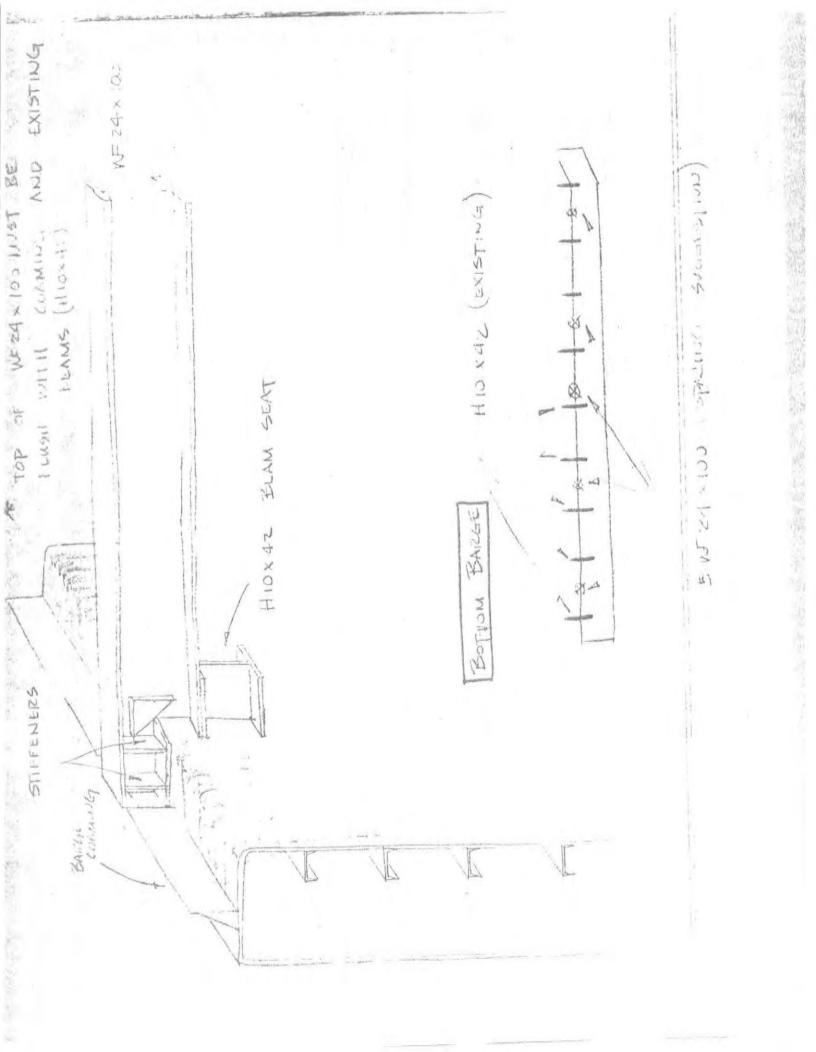


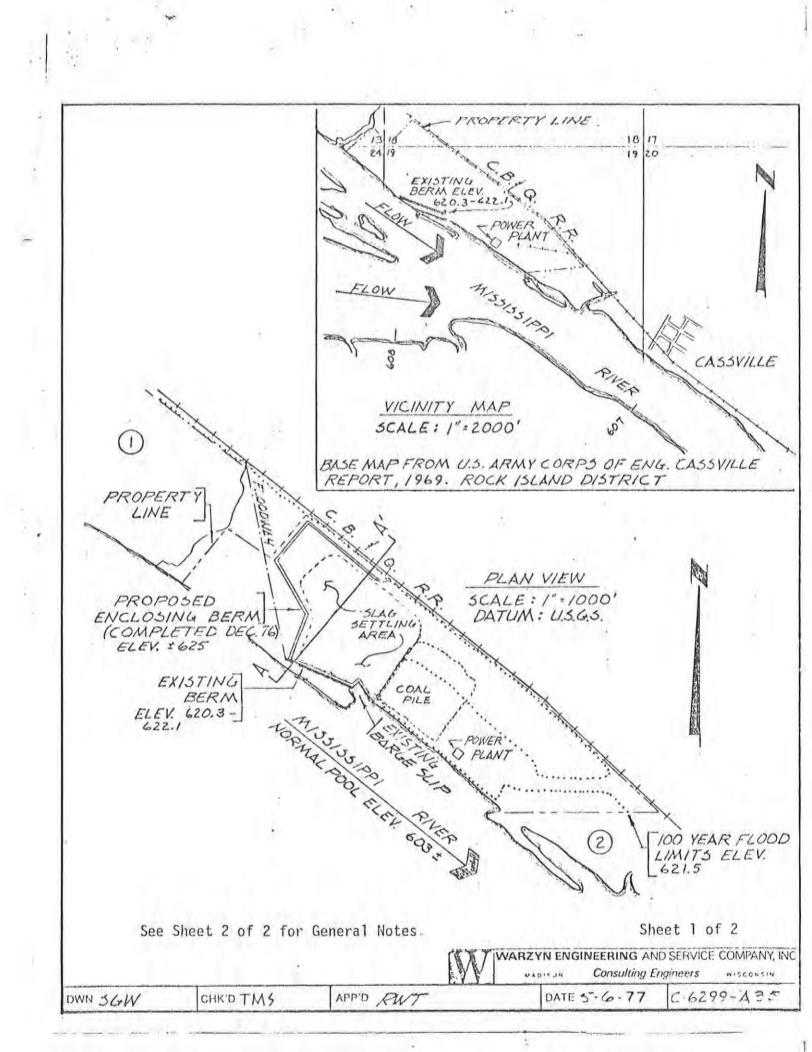


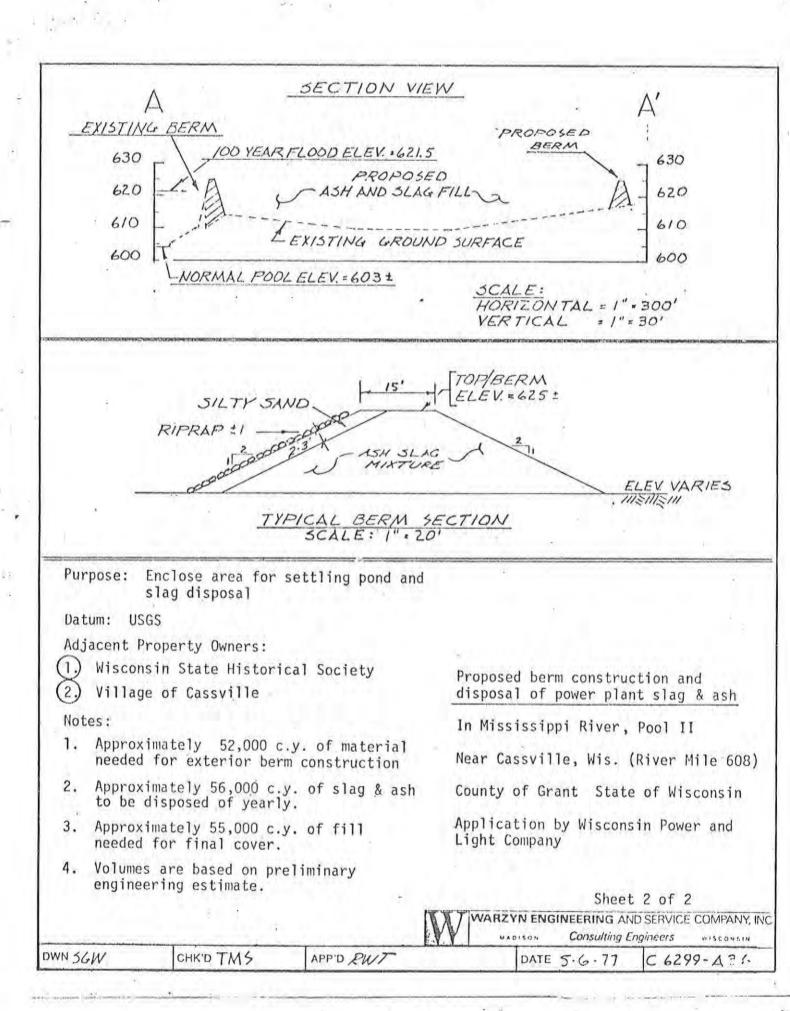


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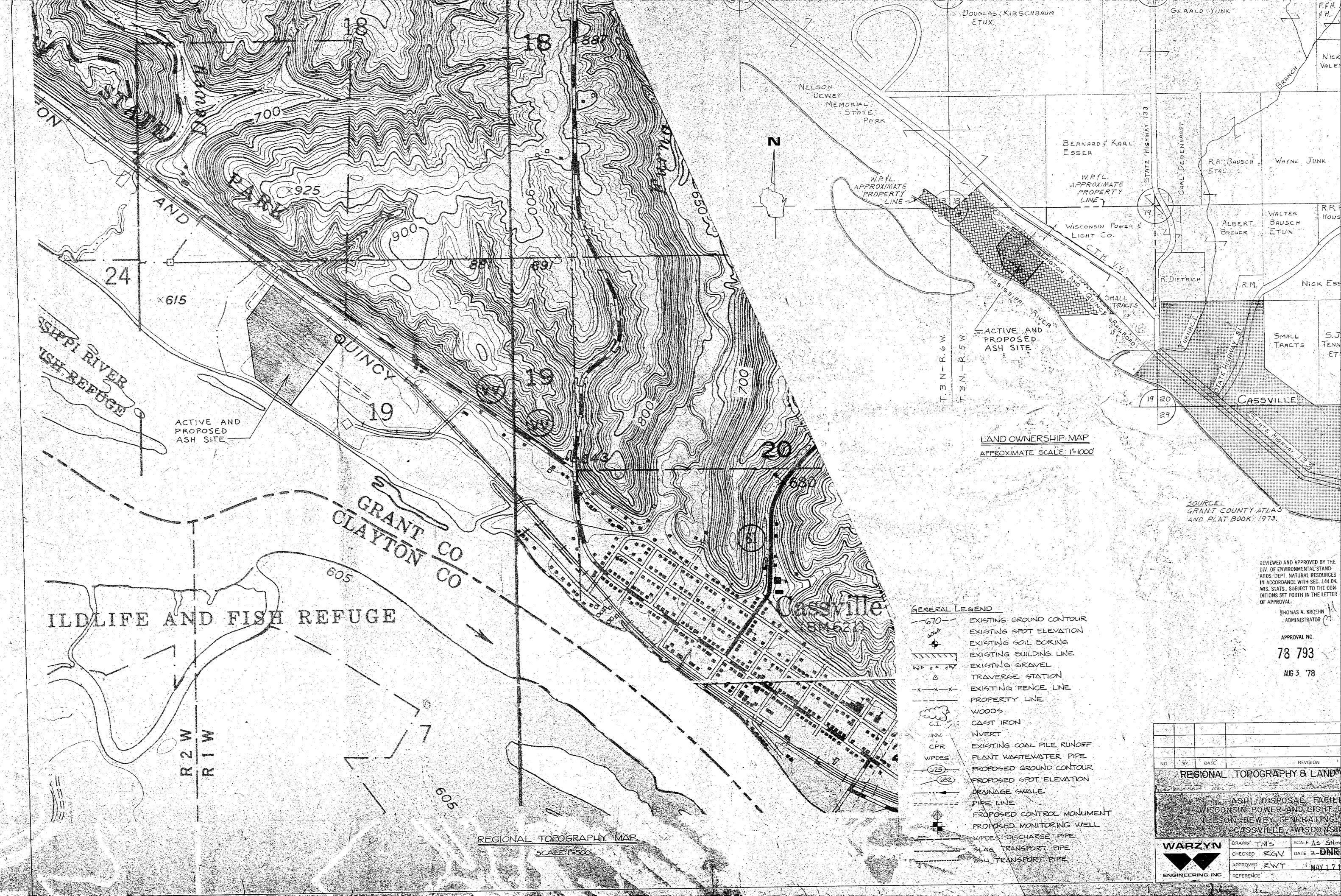


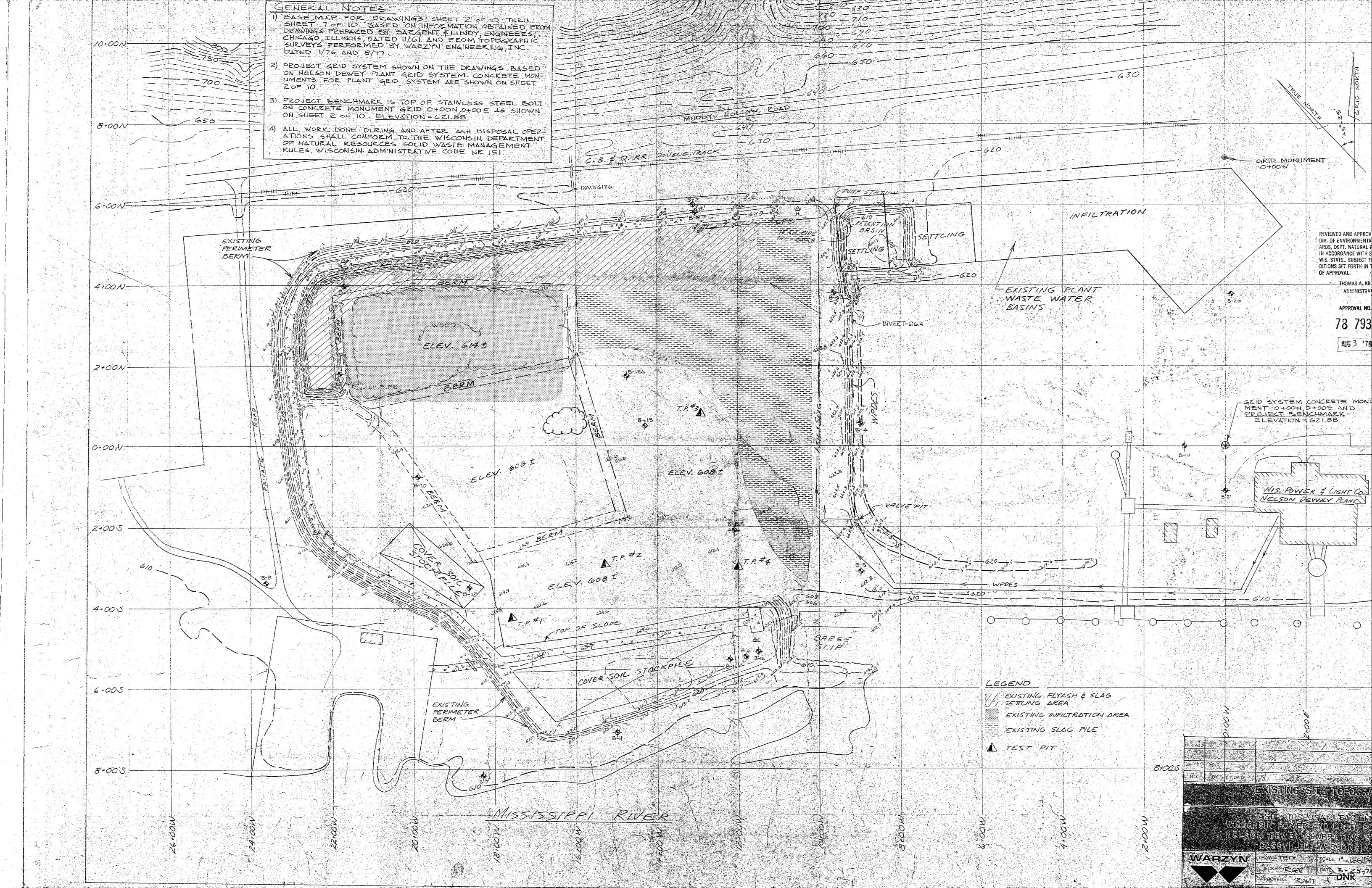
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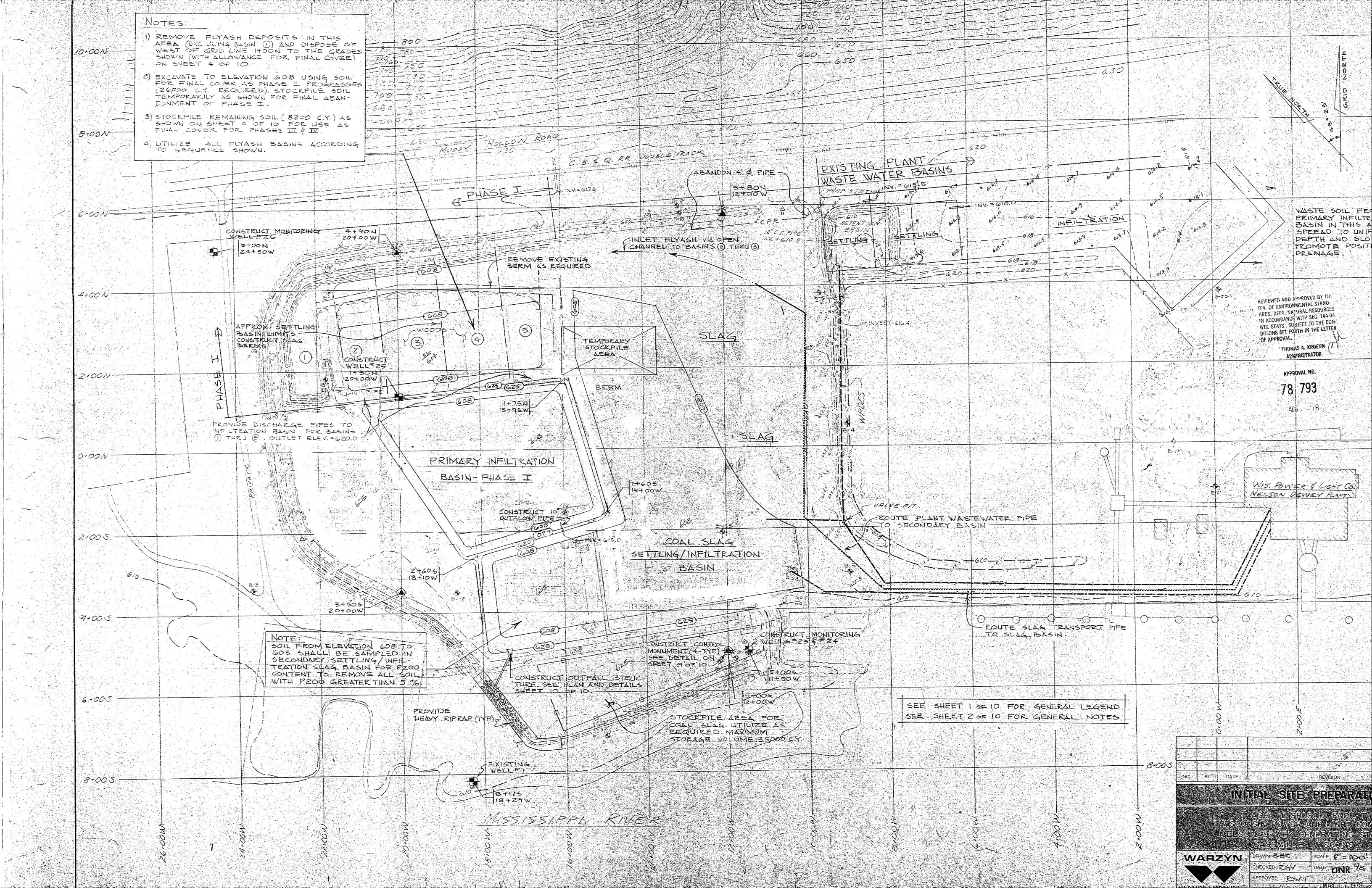
7-28-7 BC . . SLAG asta Brig trower Dich Vorpahl. 3LAG AND, MIXTURE SETTLING BASIN GRUBBING WP . 5. 4. 2. top . . 1415 SLAG ÷ .4. FULASH SUTTUNG BASIN . . 5 FLYASH FLYASH SLAG STORAGE SETTLING 0.j... SLAG BASIN Sti time Table No 3 FLYASH 12.1 STORAGE

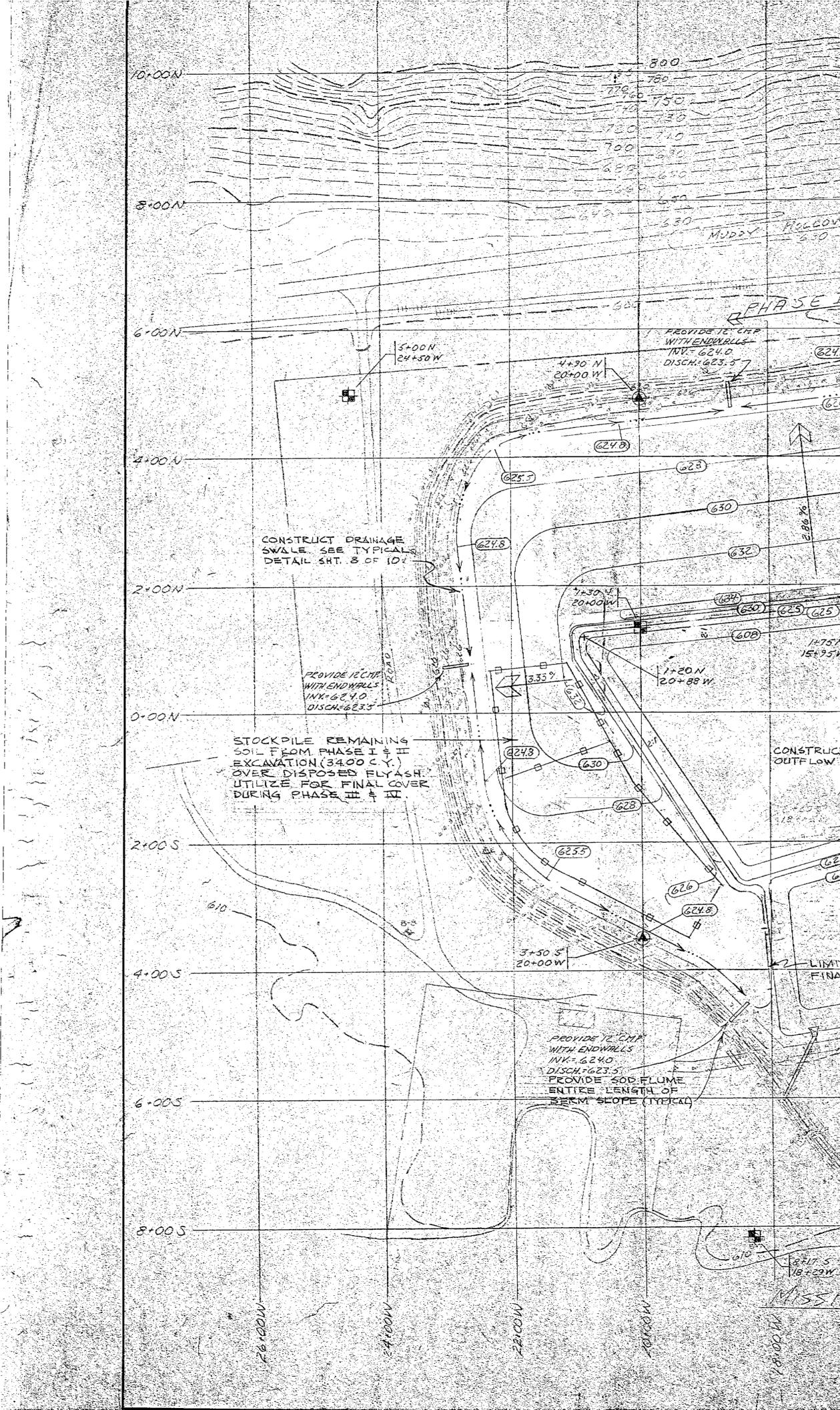
7-28-77 BL-SLAG Brian Joren Brig trower Step Dick Vospahl. SLAG GRUBBING WIXTURE SETTLING BASIN WP Hep the search and the se SLAG 2 FULASH SETTLING SLAG BASIN FLYASH FLYASH STORAGE . . SLAG SETTLING SLAG BASIN ho time table. Sti 3 FLYASH STORAGE

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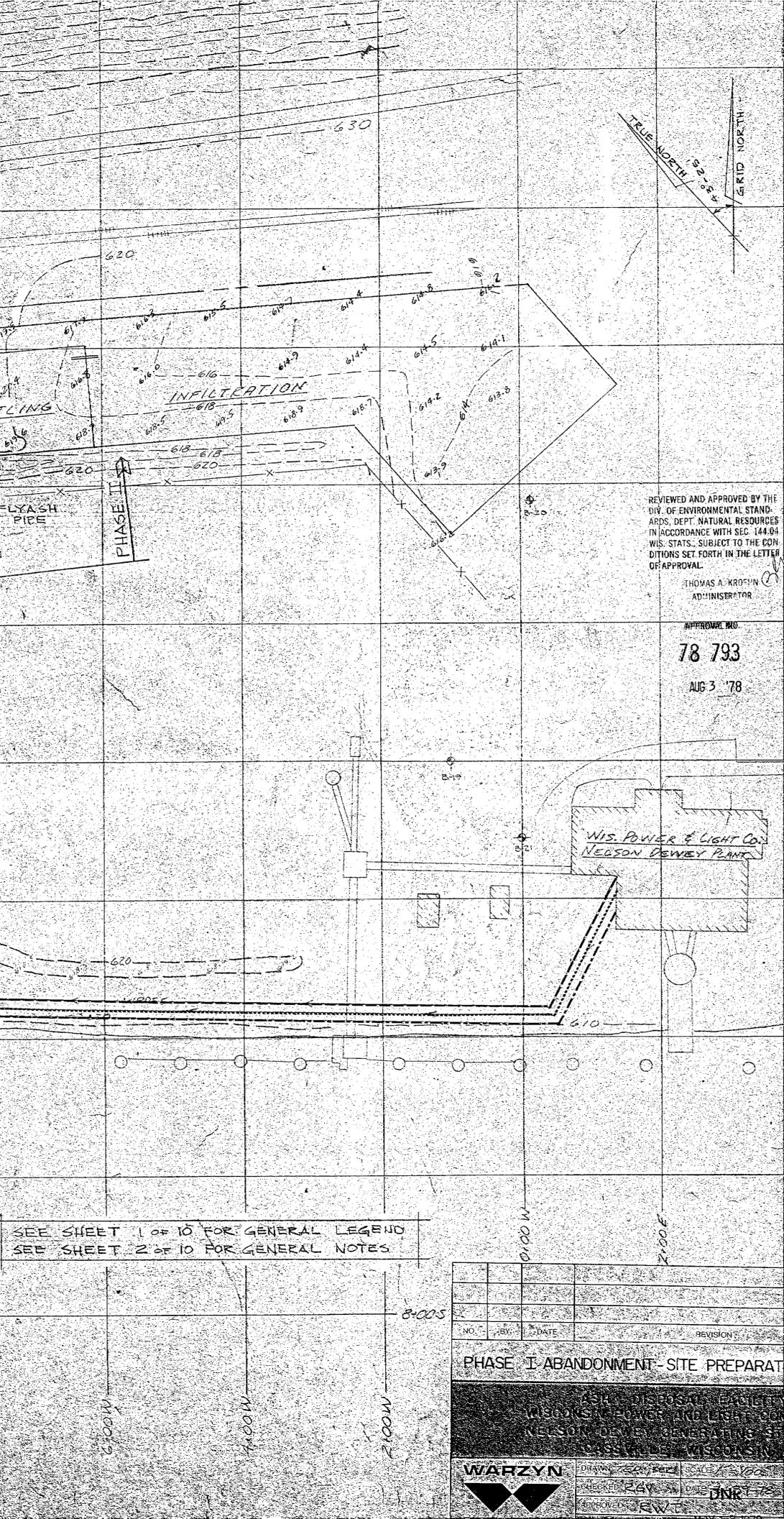


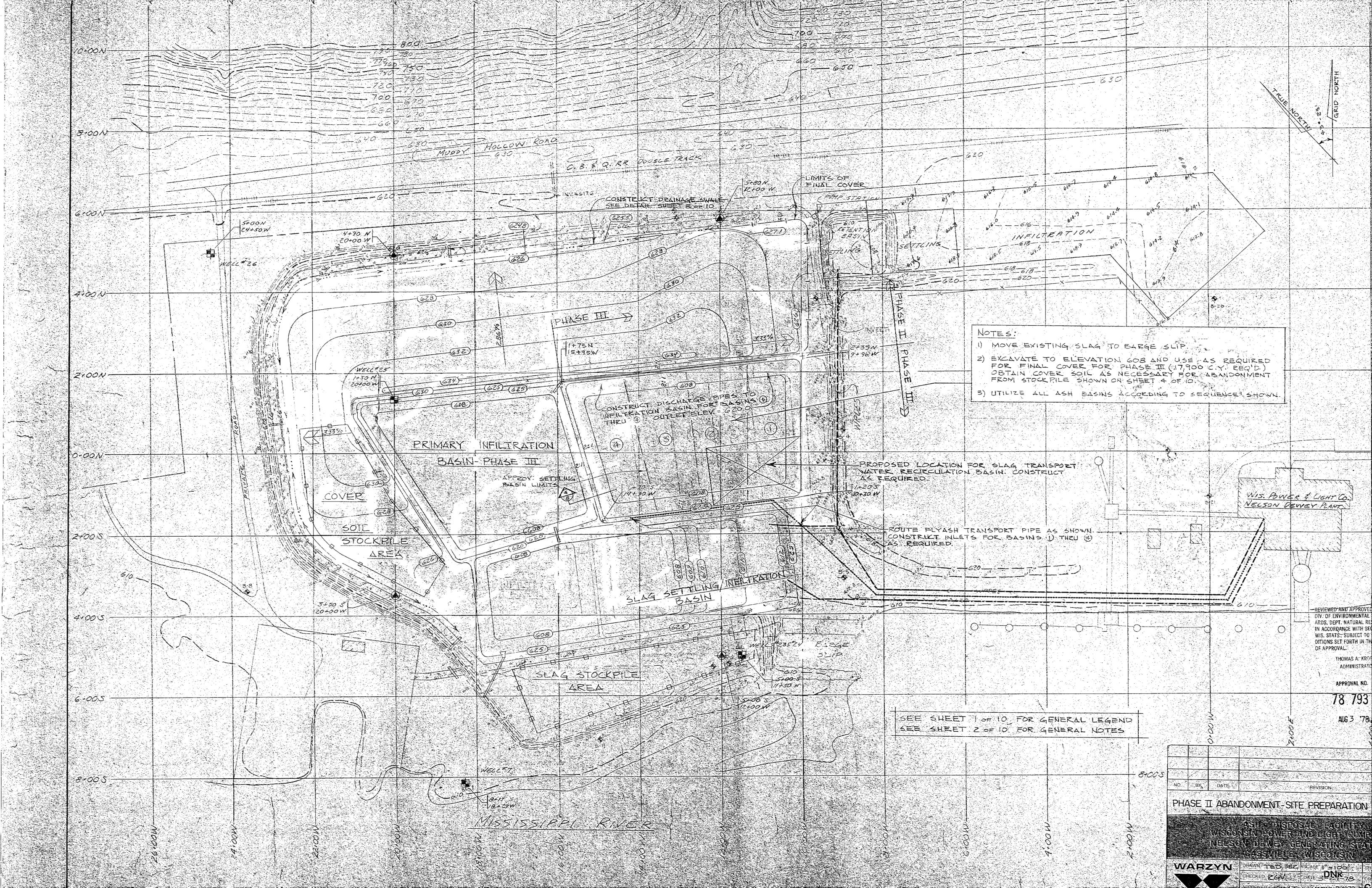


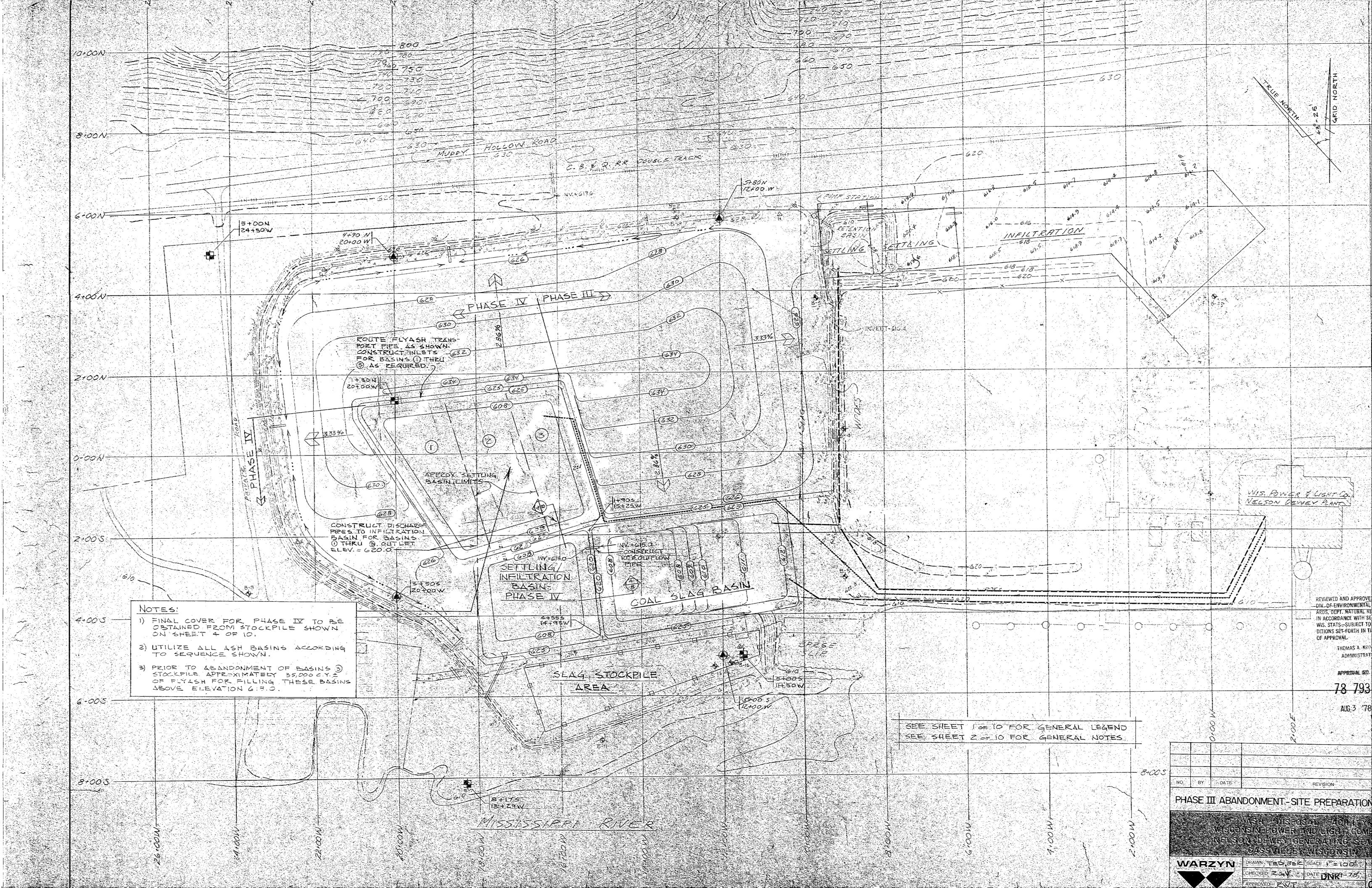


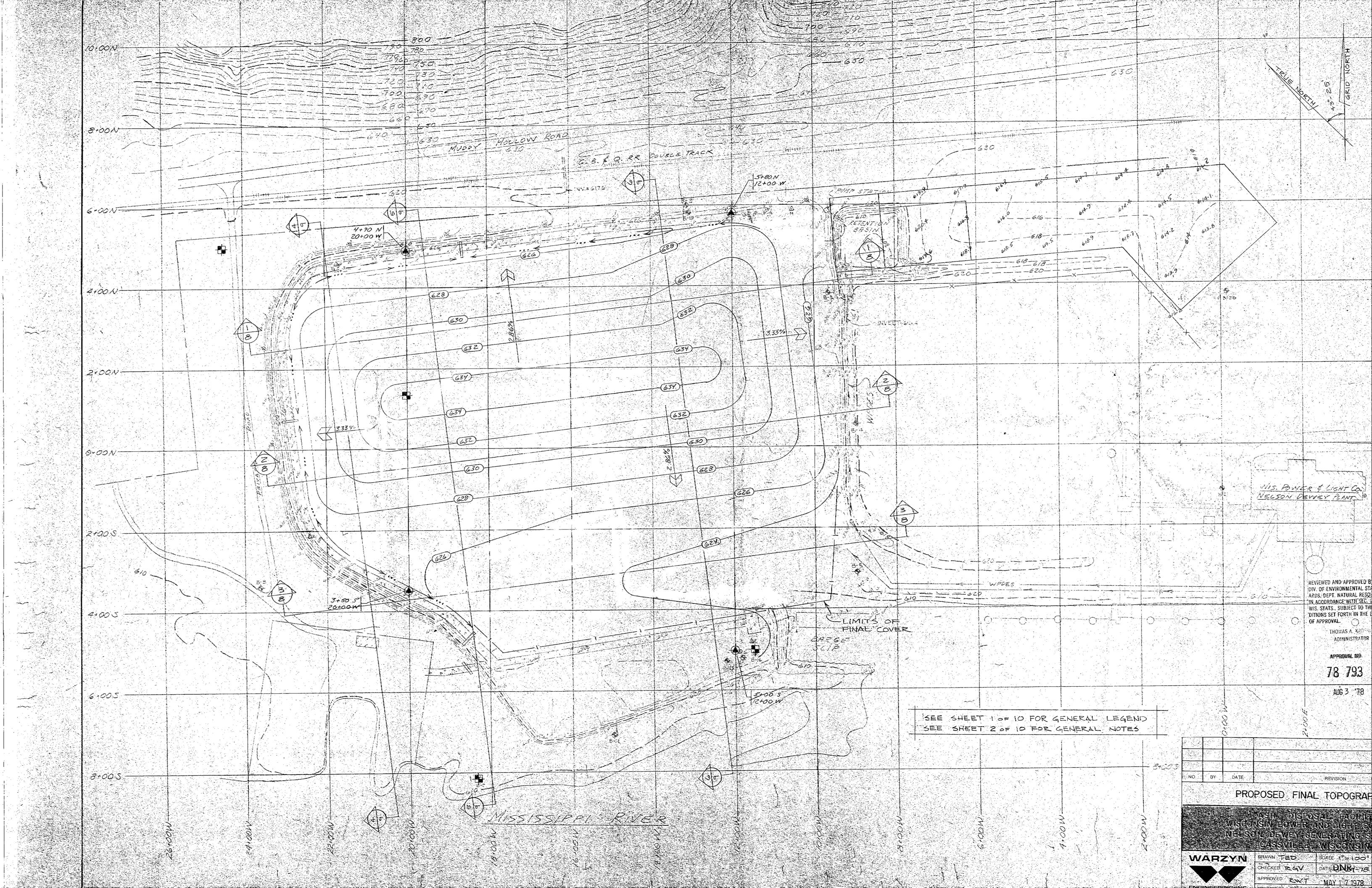


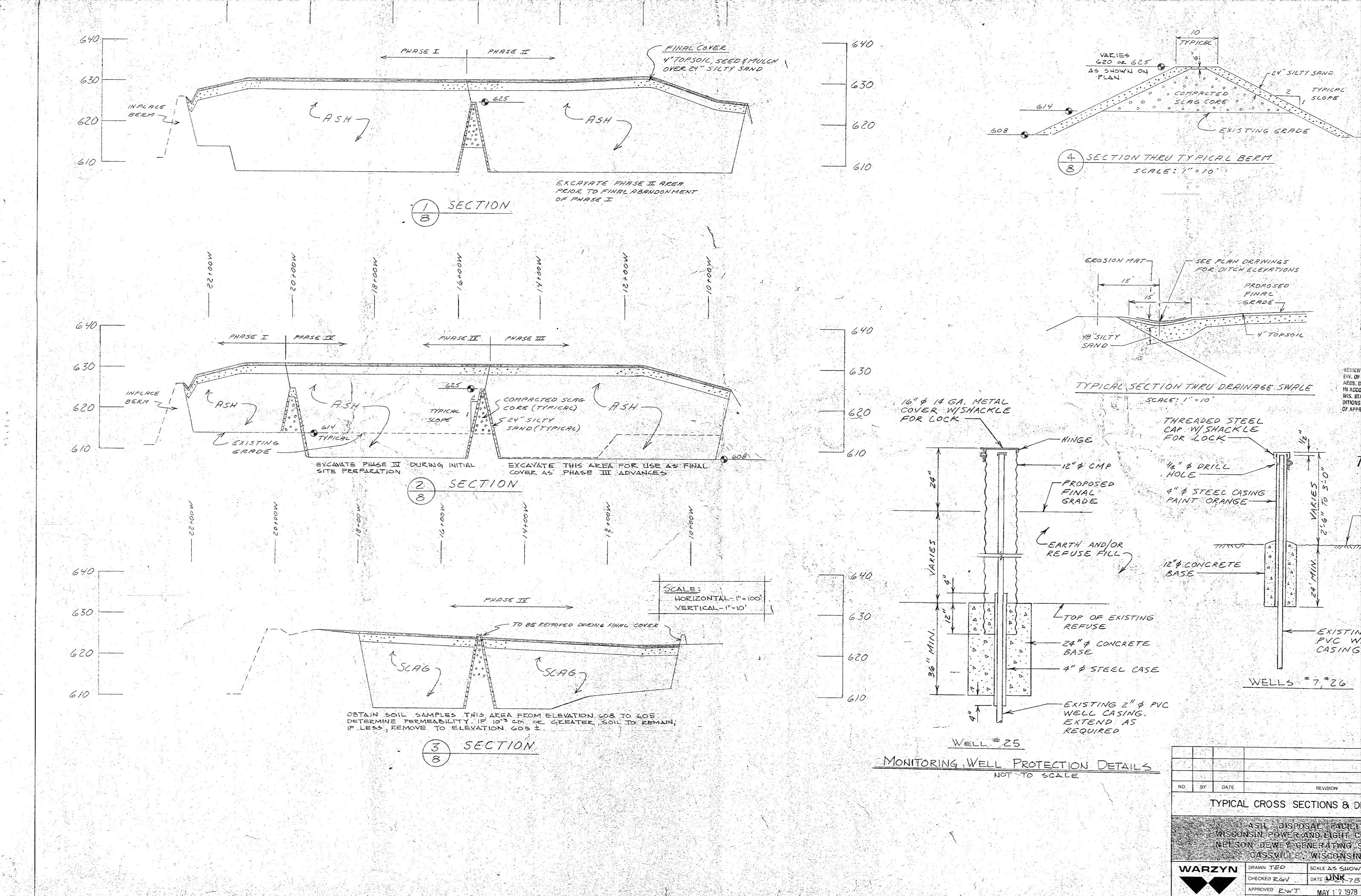


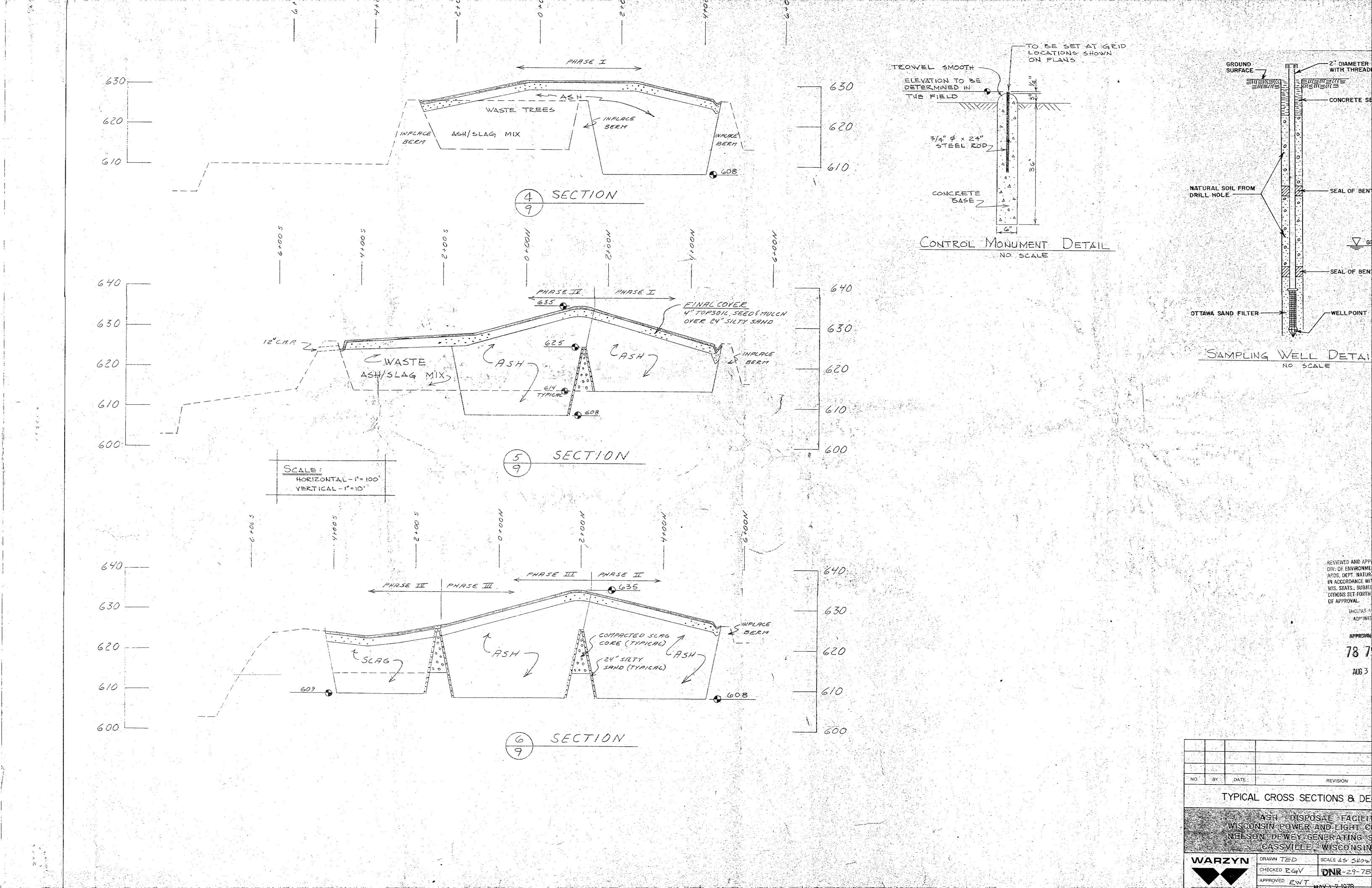


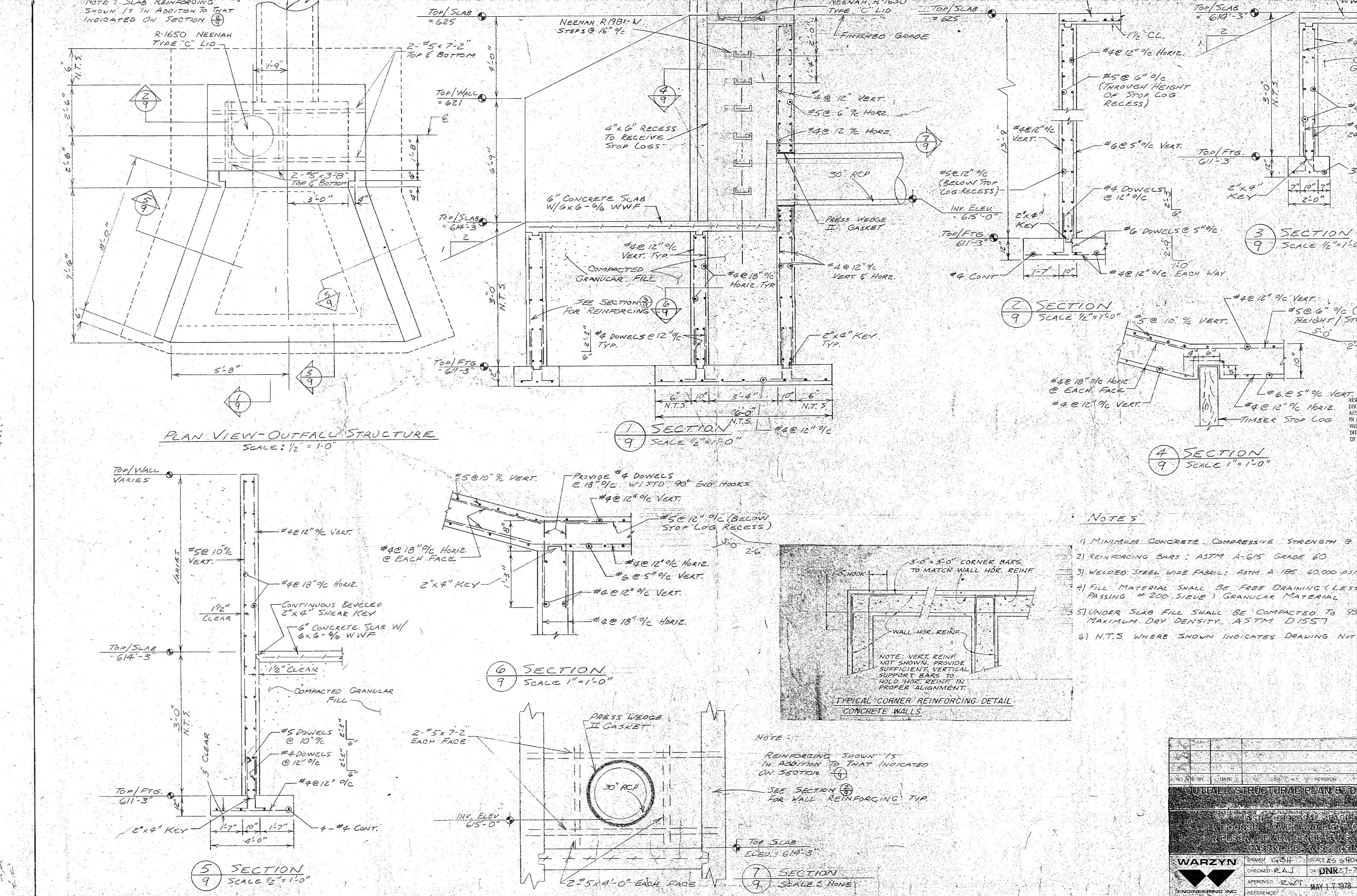


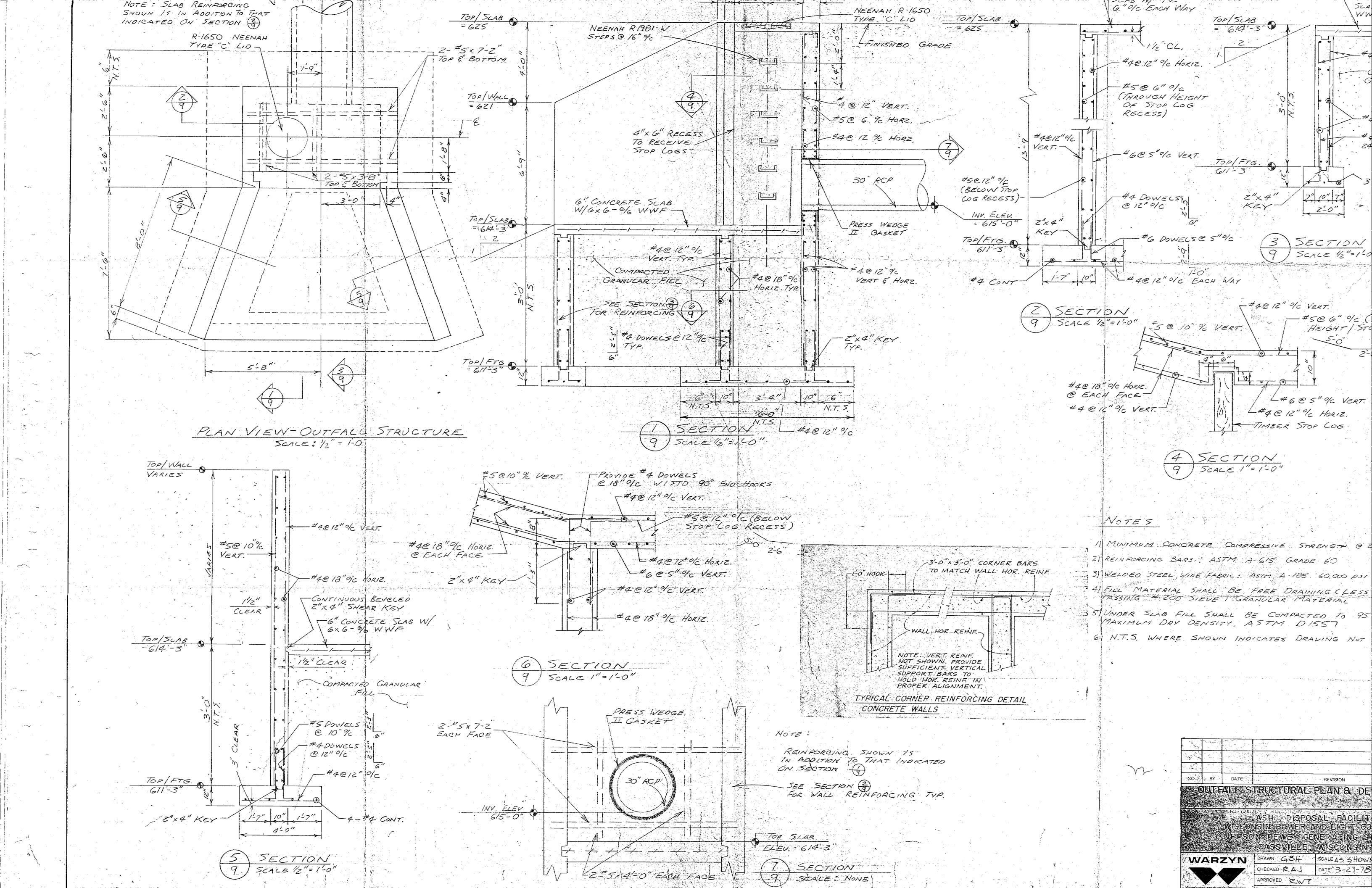


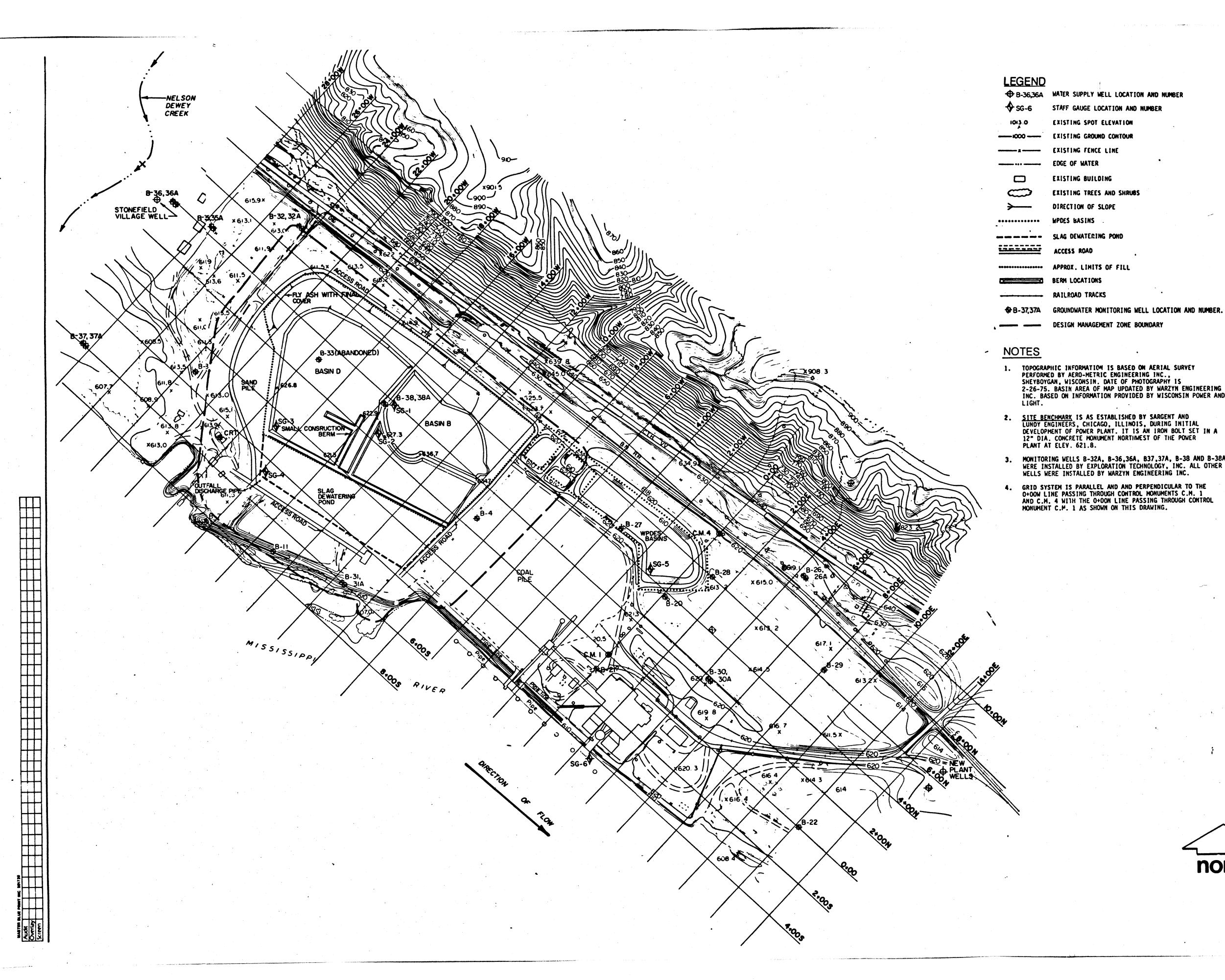






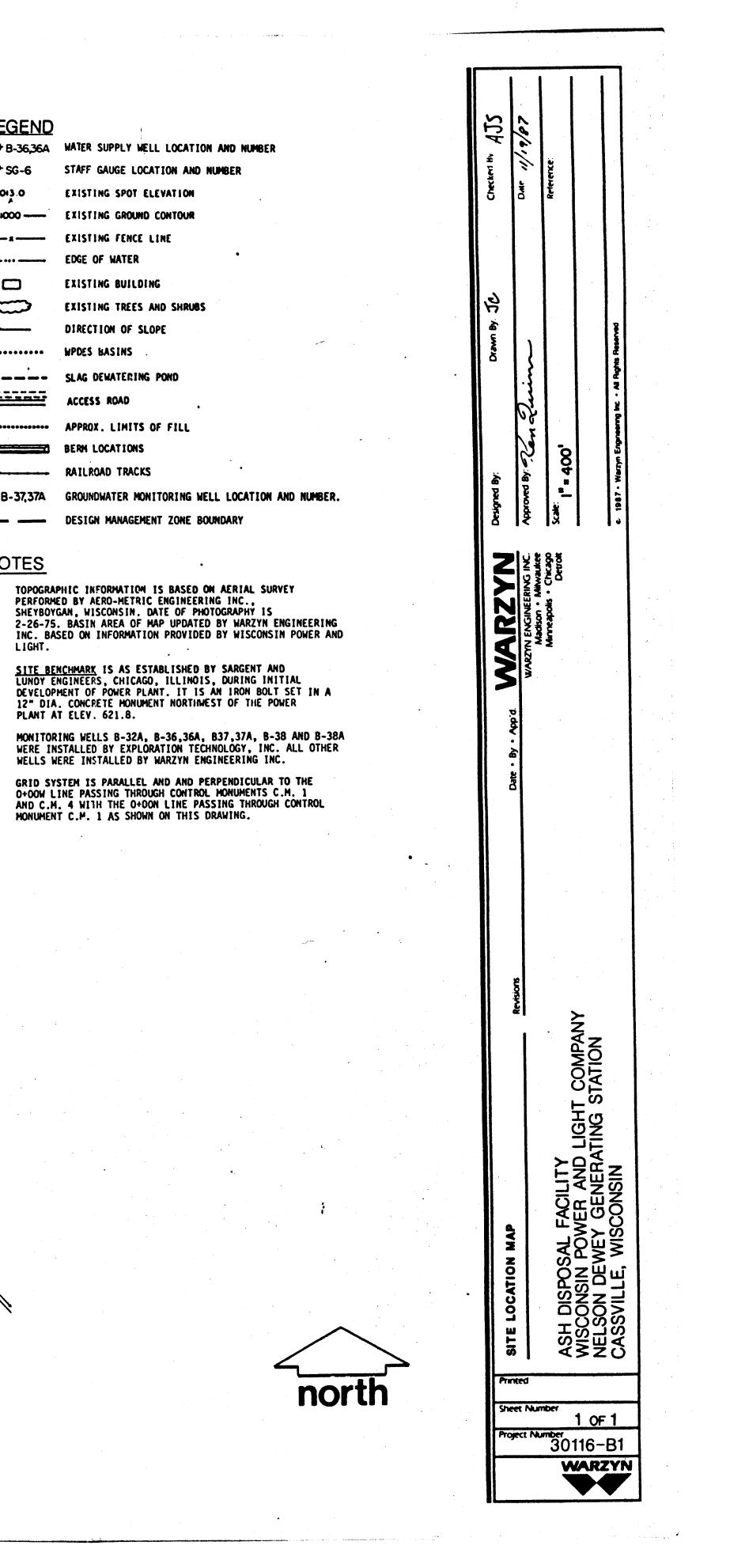


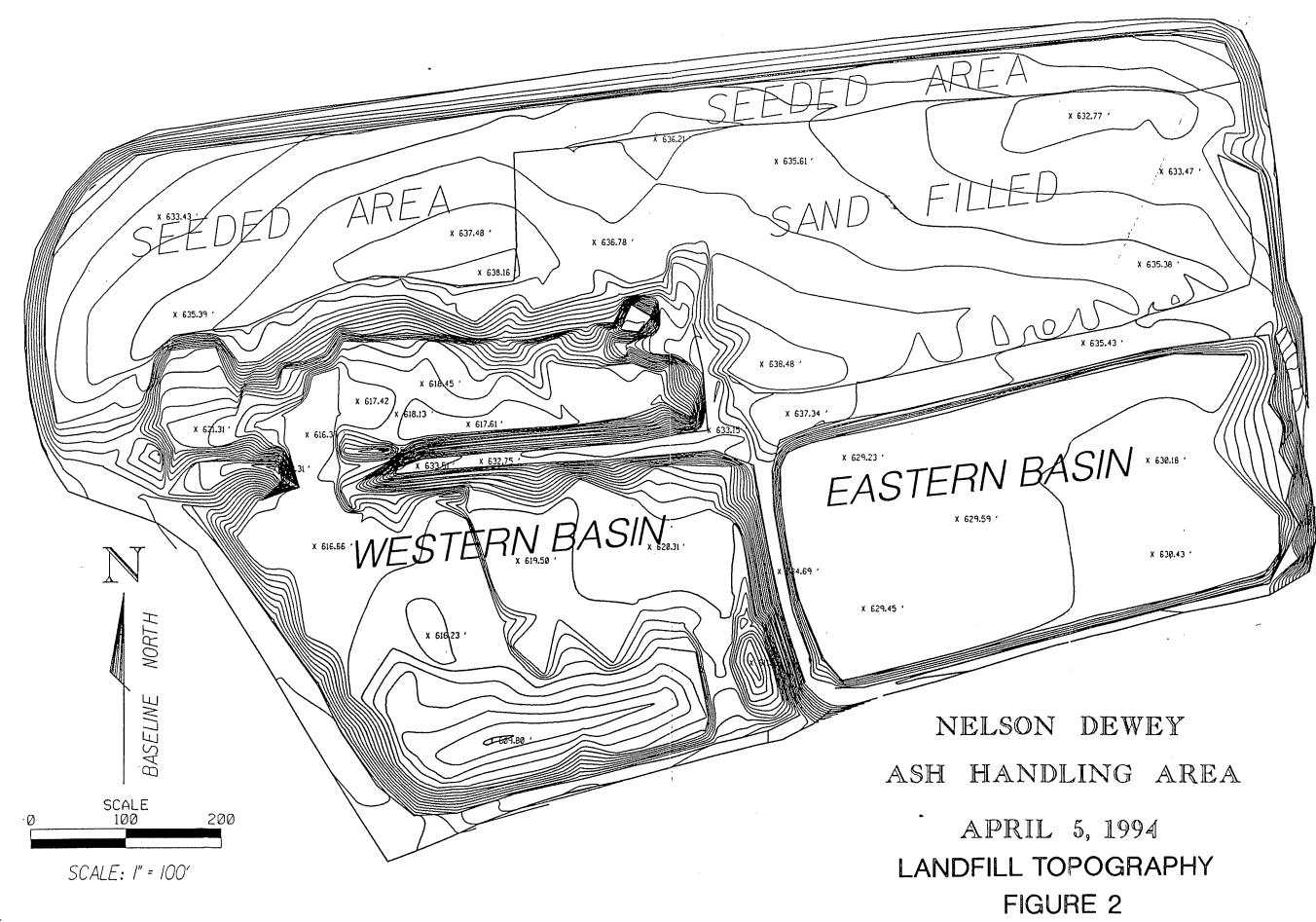




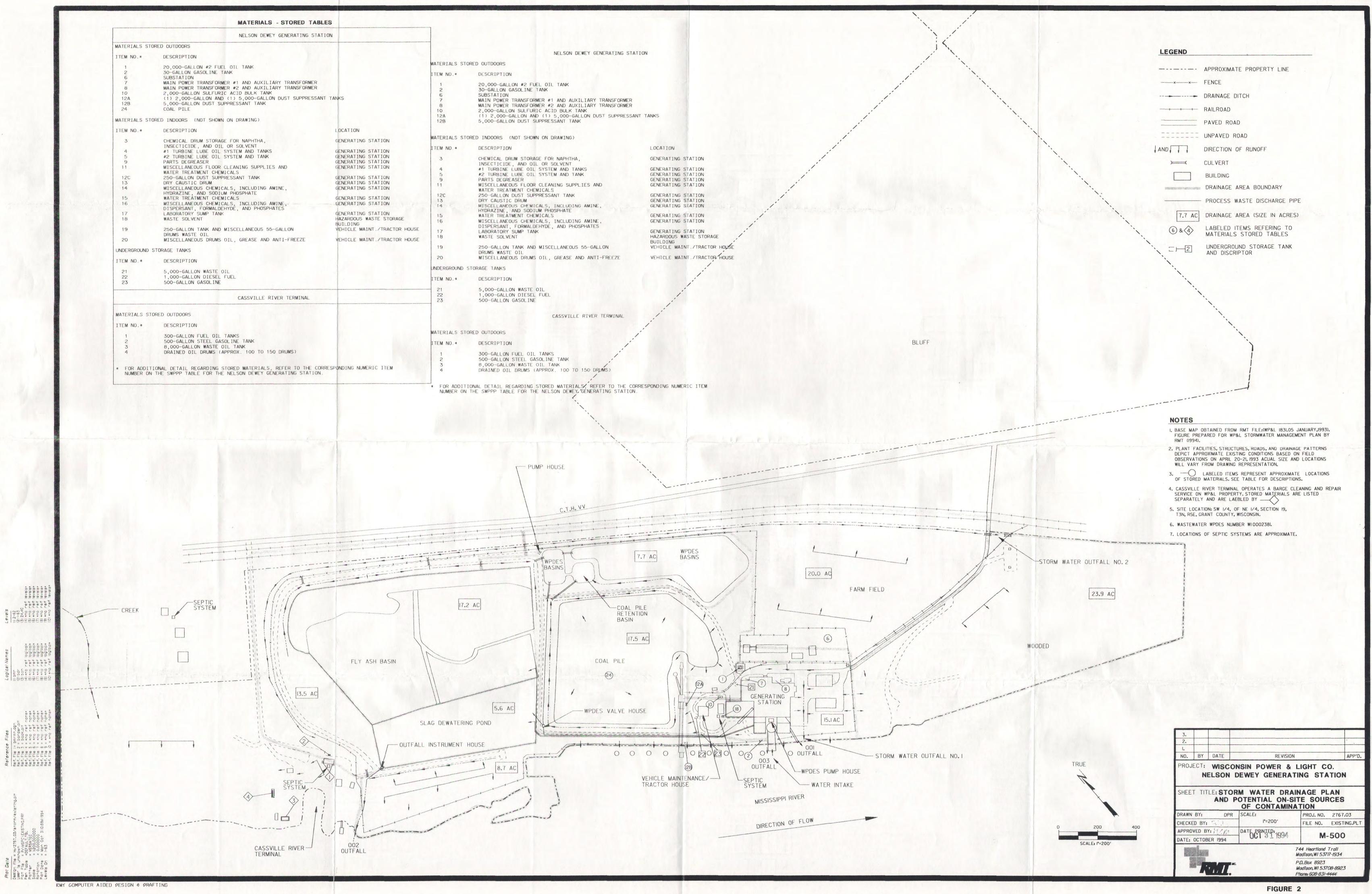
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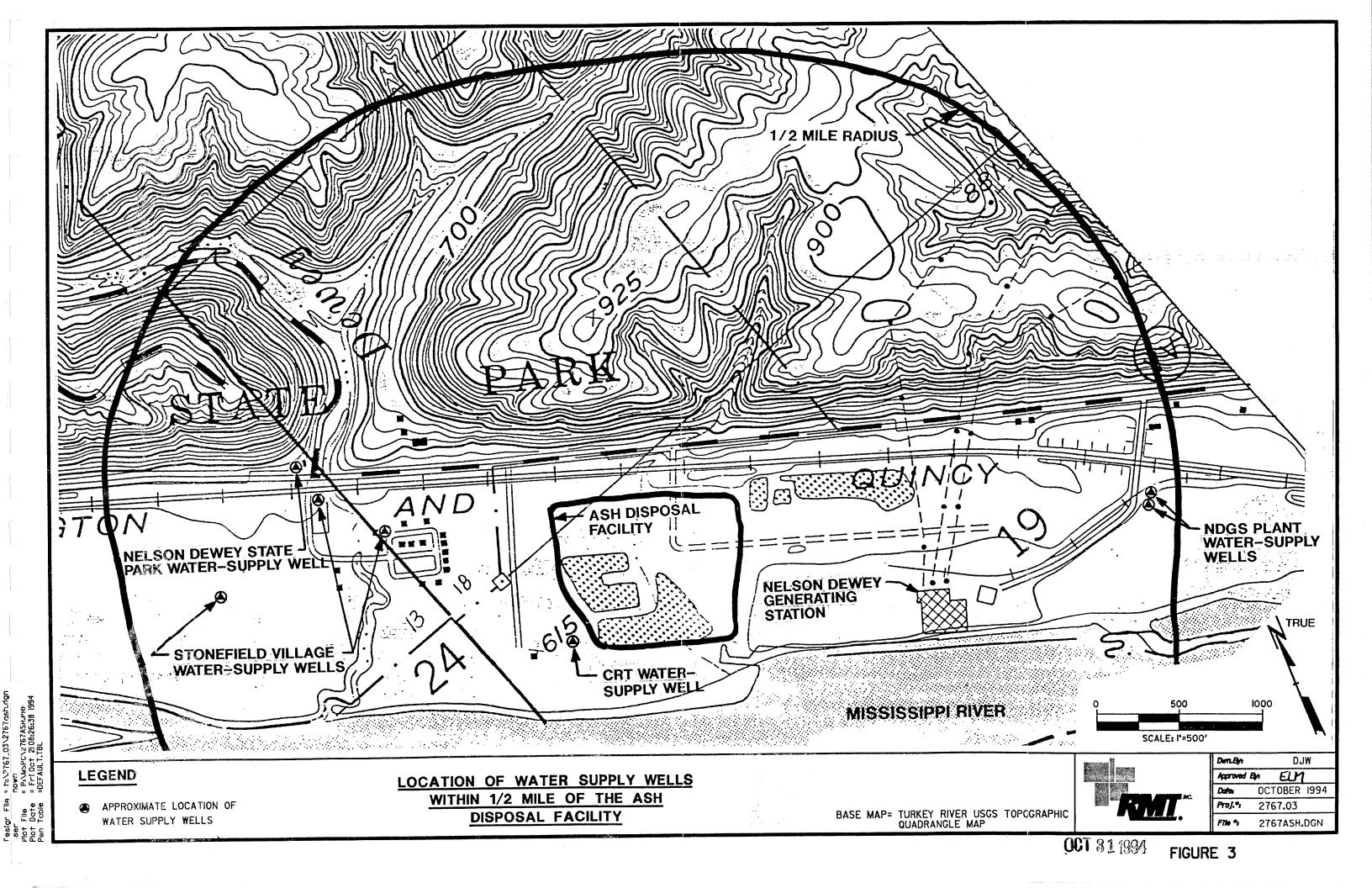
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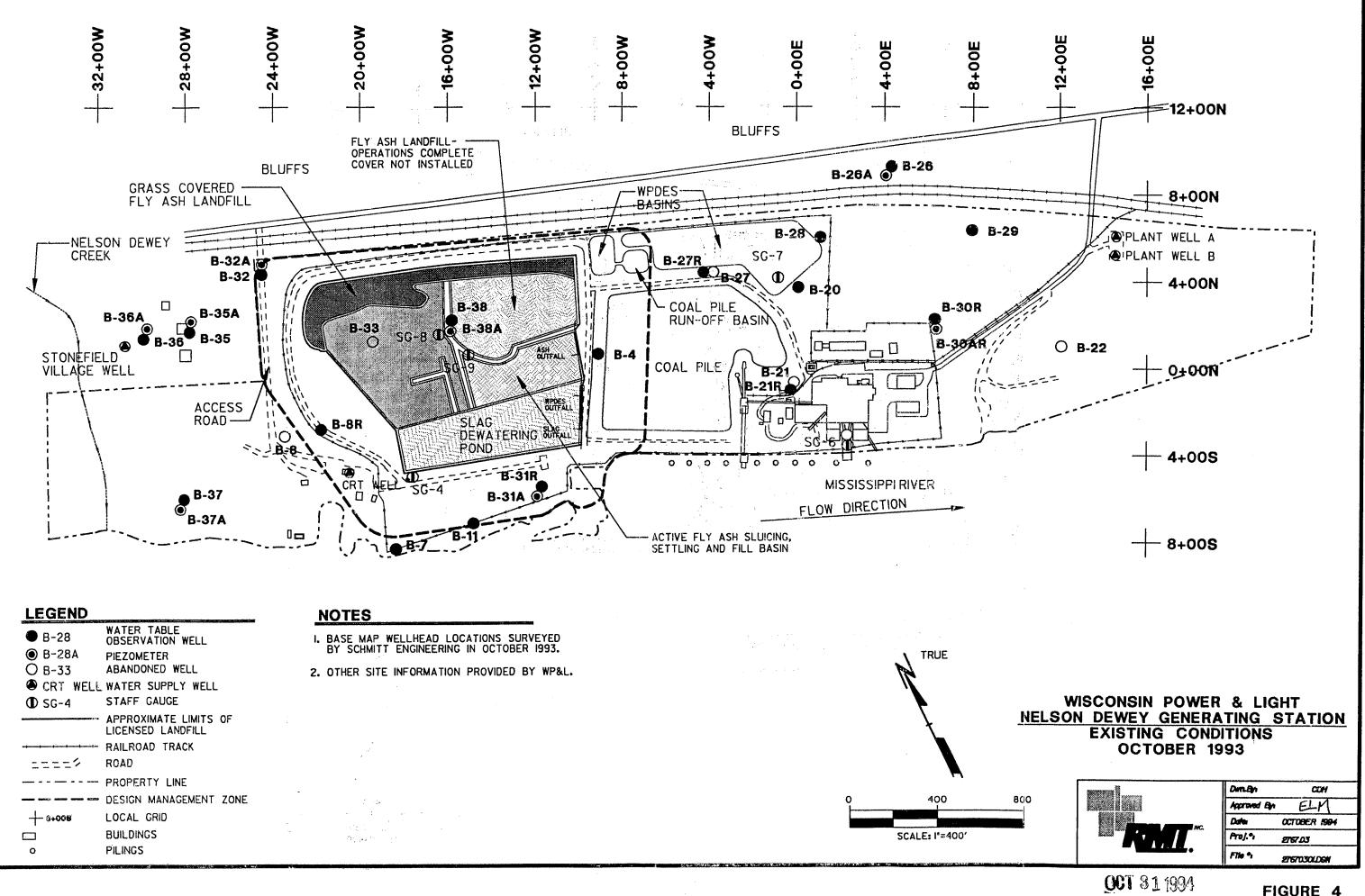




	NELSON DEWEY GENERATING STA	TION	
MATERIALS ST	DRED OUTDOORS		
ITEM NO.*	DESCRIPTION		
1	20,000-GALLON #2 FUEL OIL TANK		MATERIA
2	30-GALLON GASOLINE TANK		ITEM NO
6	SUBSTATION MAIN POWER TRANSFORMER #1 AND AUXILIARY TRANSFORMER		
8	MAIN POWER TRANSFORMER #2 AND AUXILIARY TRANSFORMER		2
10	2,000-GALLON SULFURIC ACID BULK TANK	Seale I	6
12A 12B	(1) 2,000-GALLON AND (1) 5,000-GALLON DUST SUPPRESSA 5,000-GALLON DUST SUPPRESSANT TANK	INT TANKS	7
24	COAL PILE		8
			124
MATERIALS ST	ORED INDOORS (NOT SHOWN ON DRAWING)		12B
ITEM NO.*	DESCRIPTION	LOCATION	
3	CHEMICAL DRUM STORAGE FOR NAPHTHA,	GENERATING STATION	MATERIA
~	INSECTICIDE, AND OIL OR SOLVENT		ITEM NO
4	#1 TURBINE LUBE OIL SYSTEM AND TANKS	GENERATING STATION	I I LINI INC
5 9	#2 TURBINE LUBE OIL SYSTEM AND TANK PARTS DEGREASER	GENERATING STATION GENERATING STATION	3
11_	MISCELLANEOUS FLOOR CLEANING SUPPLIES AND	GENERATING STATION	4
3.0	WATER TREATMENT CHEMICALS		5
12C 13	250-GALLON DUST SUPPRESSANT TANK DRY CAUSTIC DRUM	GENERATING STATION GENERATING STATION	9
14	MISCELLANEOUS CHEMICALS, INCLUDING AMINE,	GENERATING STATION	11
	HYDRAZINE, AND SODIUM PHOSPHATE		120
15	WATER TREATMENT CHEMICALS MISCELLANEOUS CHEMICALS, INCLUDING AMINE,	GENERATING STATION GENERATING STATION	13
10	DISPERSANT, FORMALDEHYDE, AND PHOSPHATES	VENERATING STATION	14
17	LABORATORY SUMP TANK	GENERATING STATION	15
18	WASTE SOLVENT	HAZARDOUS WASTE STORAGE BUILDING	16
19	250-GALLON TANK AND MISCELLANEOUS 55-GALLON	VEHICLE MAINT. / TRACTOR HOUSE	17
	DRUMS WASTE OIL	VELLE MATHE (TRACTOR LOUSE	18
20	MISCELLANEOUS DRUMS OIL, GREASE AND ANTI-FREEZE	VEHICLE MAINT./TRACTOR HOUSE	1. 10
UNDERGROUND	STORAGE TANKS		19
ITEM NO.*	DESCRIPTION		20
			UNDERGR
21 22	5,000-GALLON WASTE OIL 1,000-GALLON DIESEL FUEL		
23	500-GALLON GASOLINE		ITEM NO
			- 21
	CASSVILLE RIVER TERMINAL		22 23
MATERIALS ST	ORED OUTDOORS		
ITEM NO.*	DESCRIPTION		
1	300-GALLON FUEL OIL TANKS		MATERIA
2	500-GALLON STEEL GASOLINE TANK		ITEM NO
3	8,000-GALLON WASTE OIL TANK DRAINED OIL DRUMS (APPROX. 100 TO 150 DRUMS)	a distance in the second	
			2
	IONAL DETAIL REGARDING STORED MATERIALS, REFER TO THE CO	DRRESPONDING NUMERIC ITEM	3
NUMBER ON	THE SWPPP TABLE FOR THE NELSON DEWEY GENERATING STATION	I I I I I I I I I I I I I I I I I I I	4



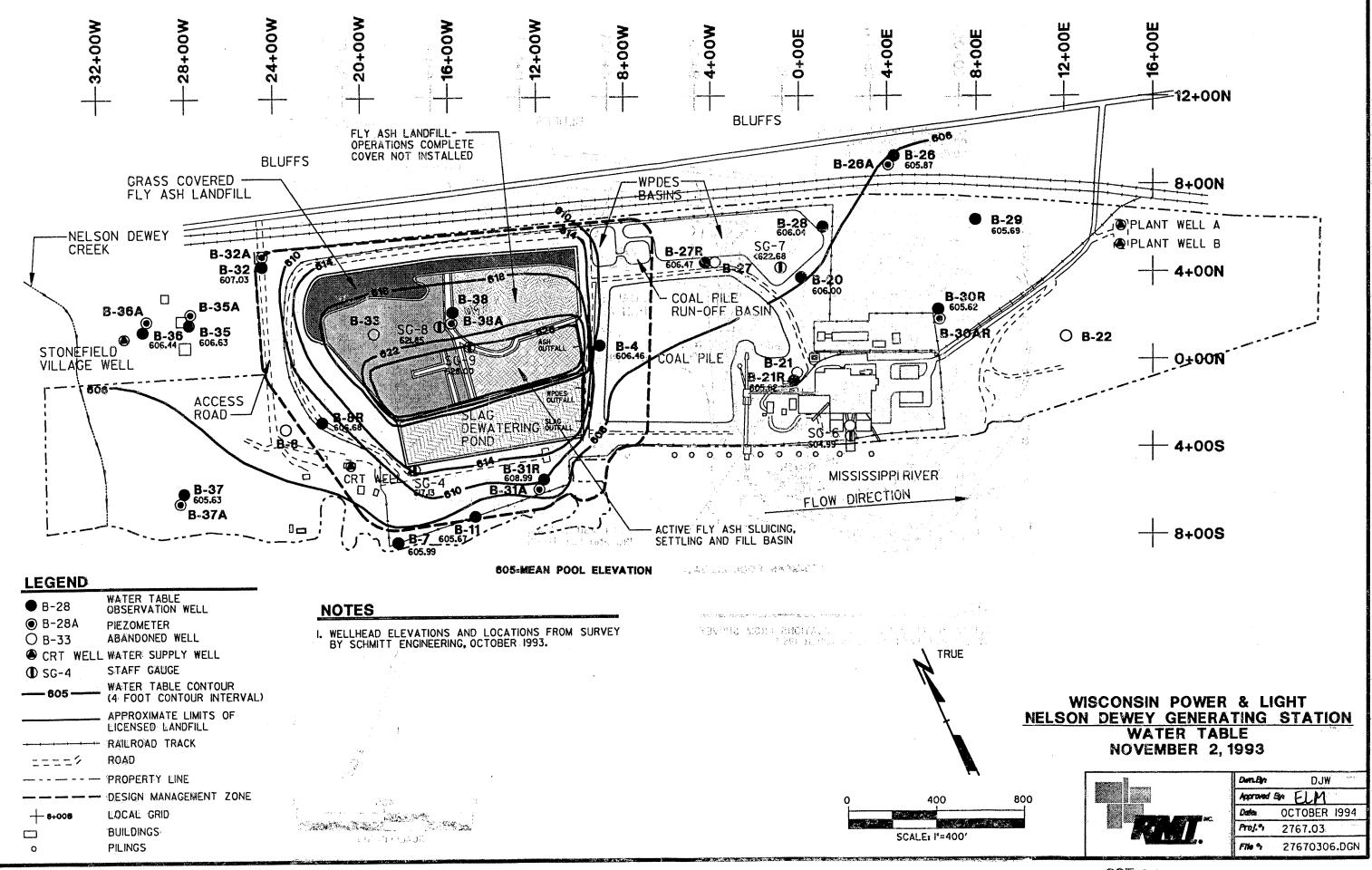




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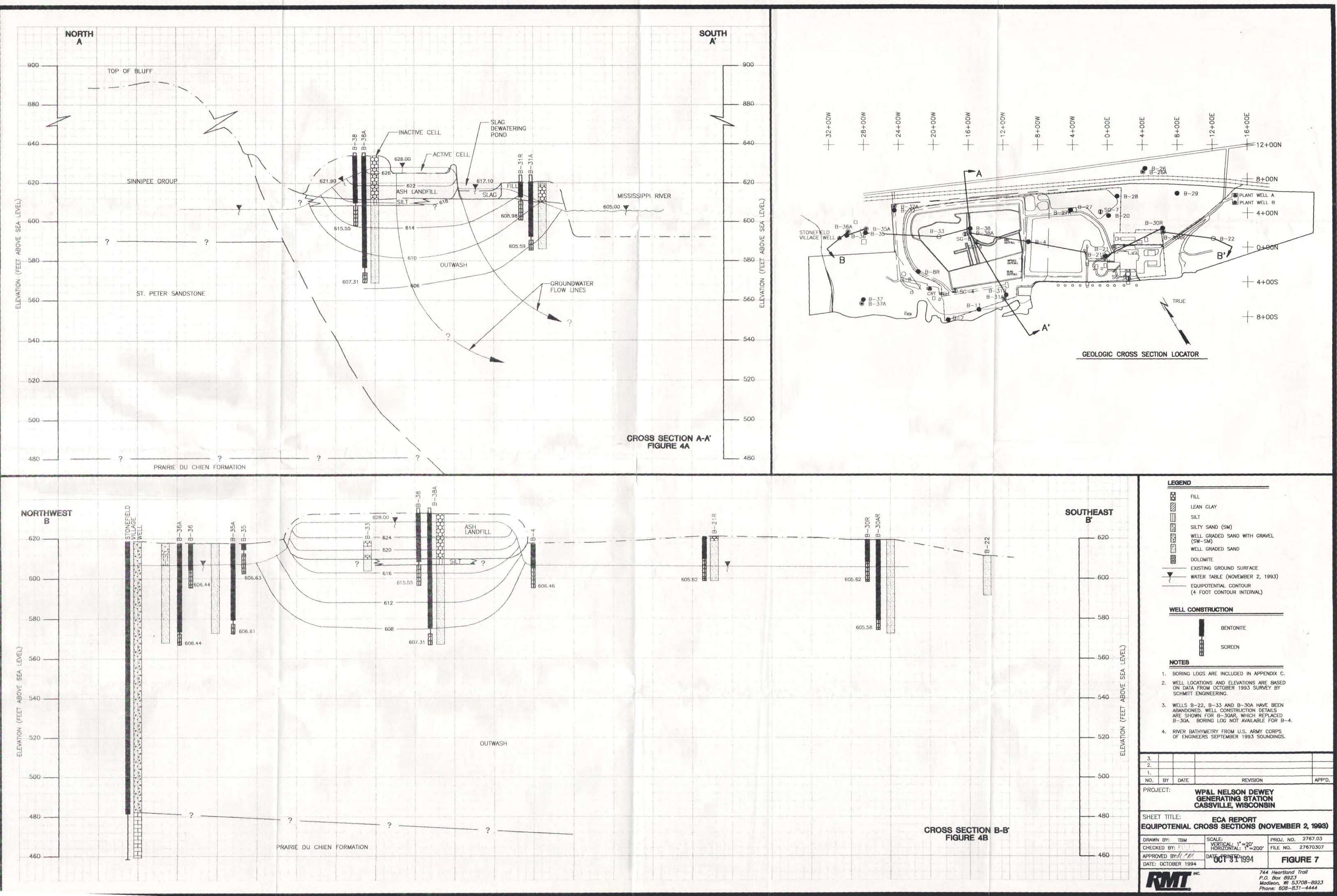


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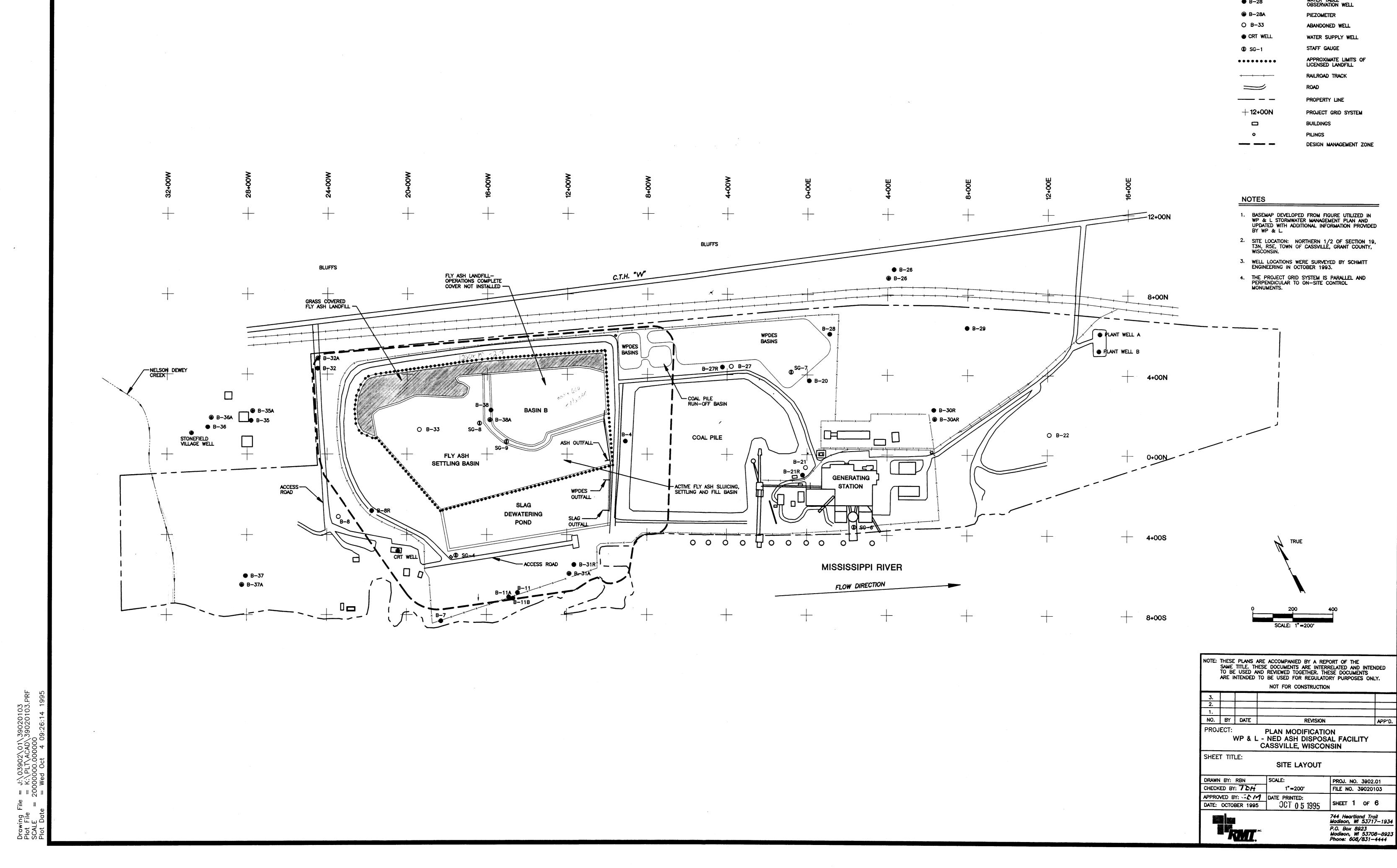
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FIGURE 6



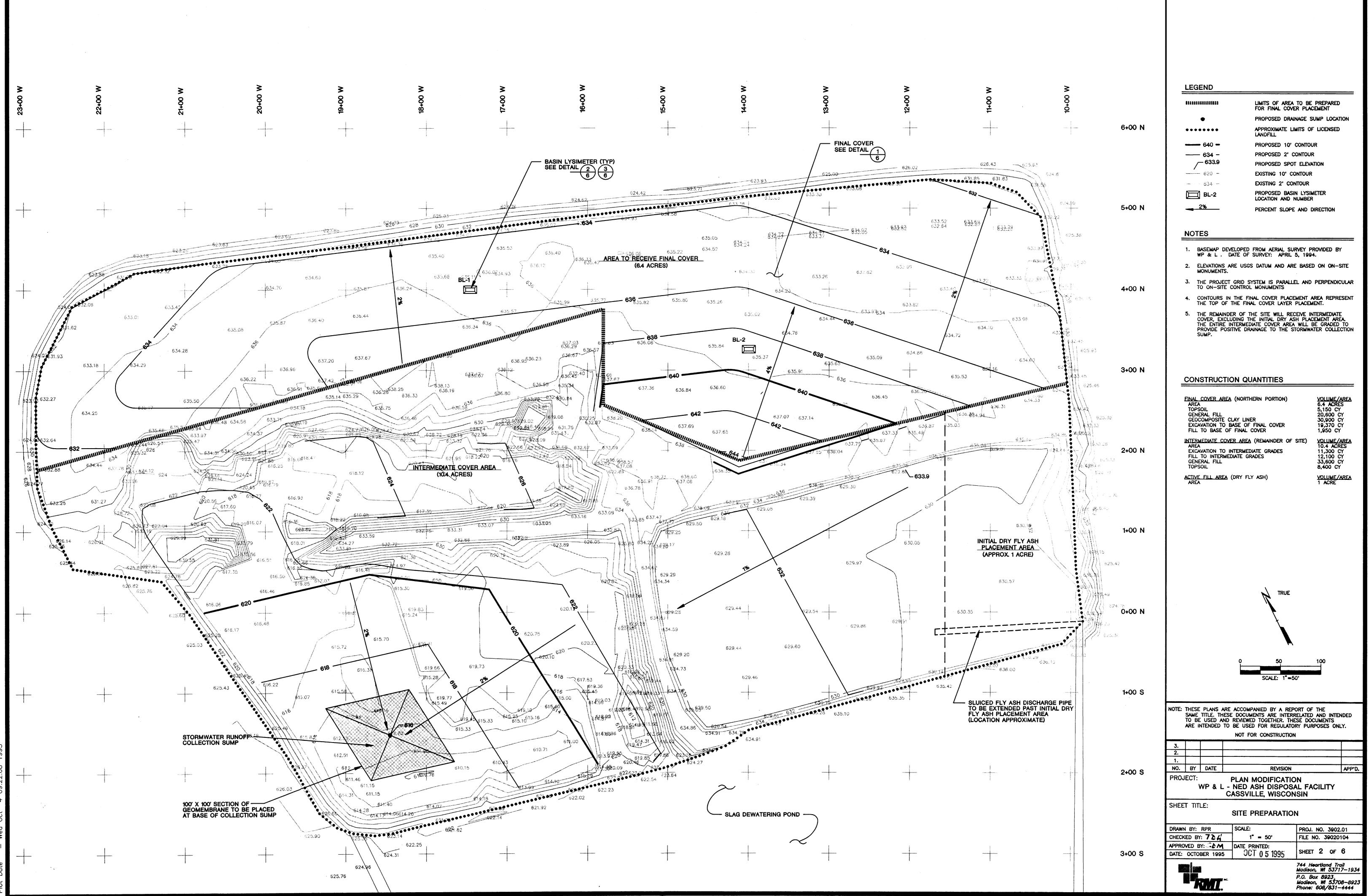
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LEGEND		
● B-28	WATER TABLE OBSERVATION WELL	
B-28A	PIEZOMETER	
O B-33	ABANDONED WELL	
CRT WELL	WATER SUPPLY WELL	
① SG−1	STAFF GAUGE	
••••	APPROXIMATE LIMITS OF LICENSED LANDFILL	
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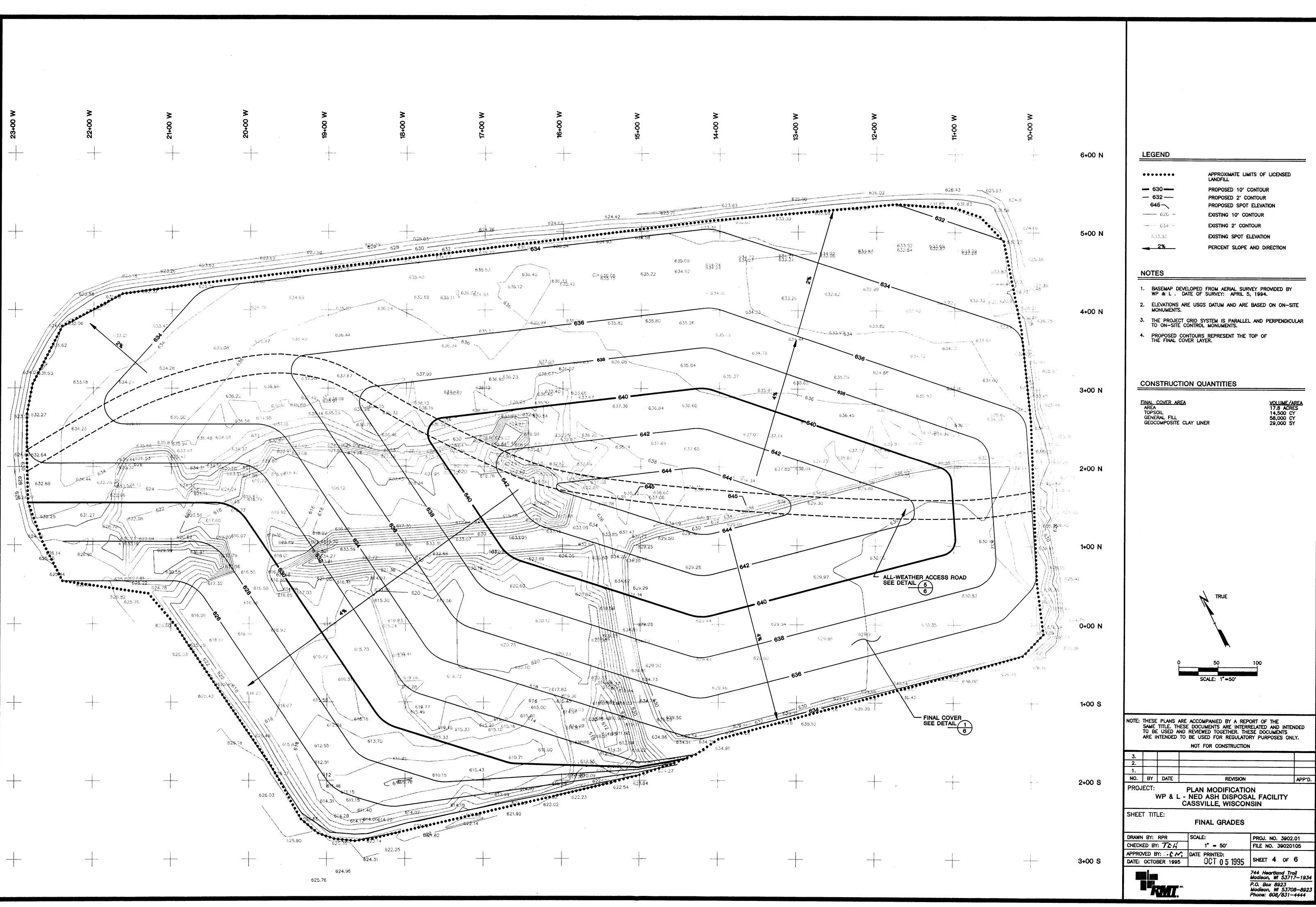
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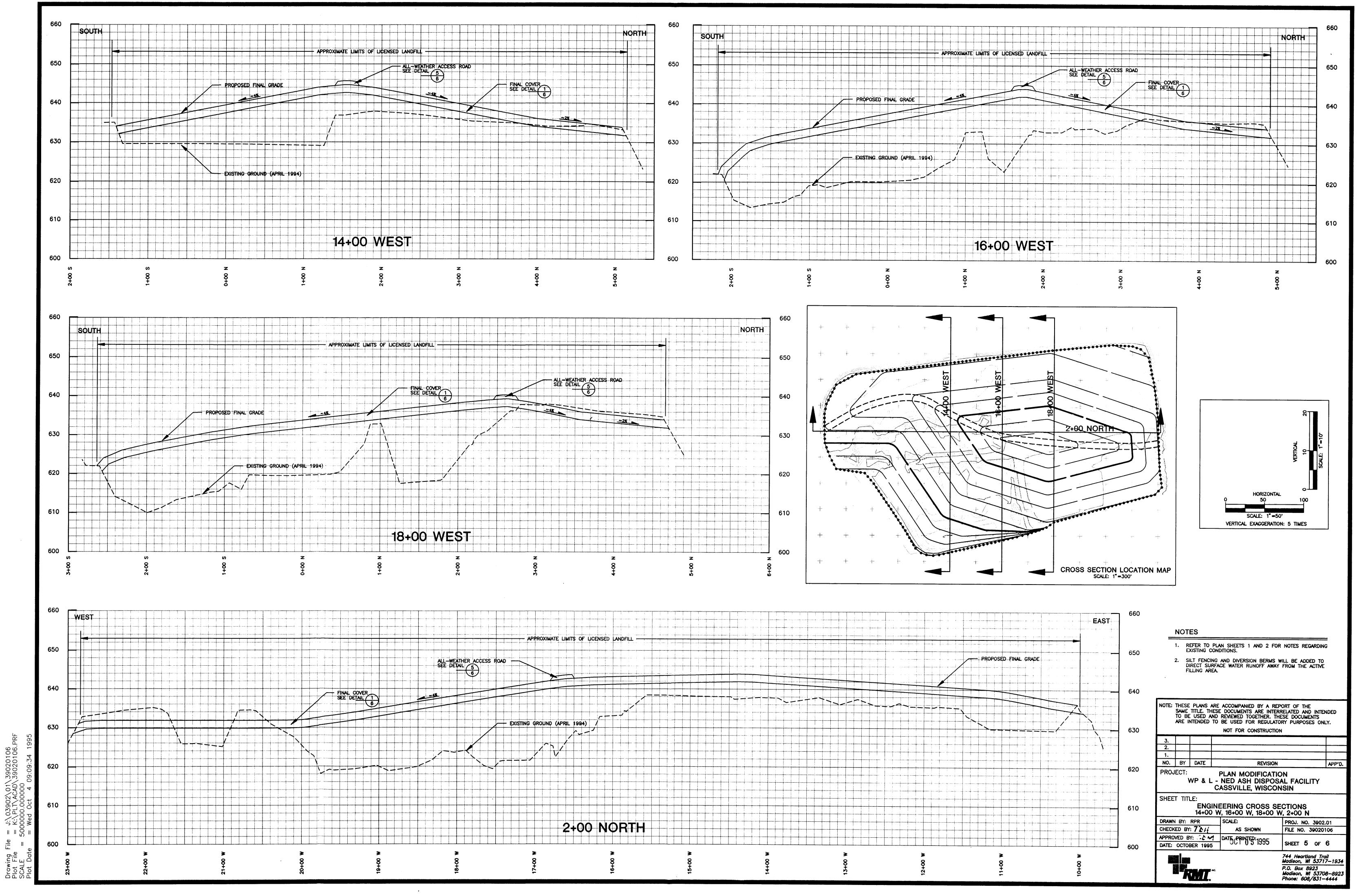
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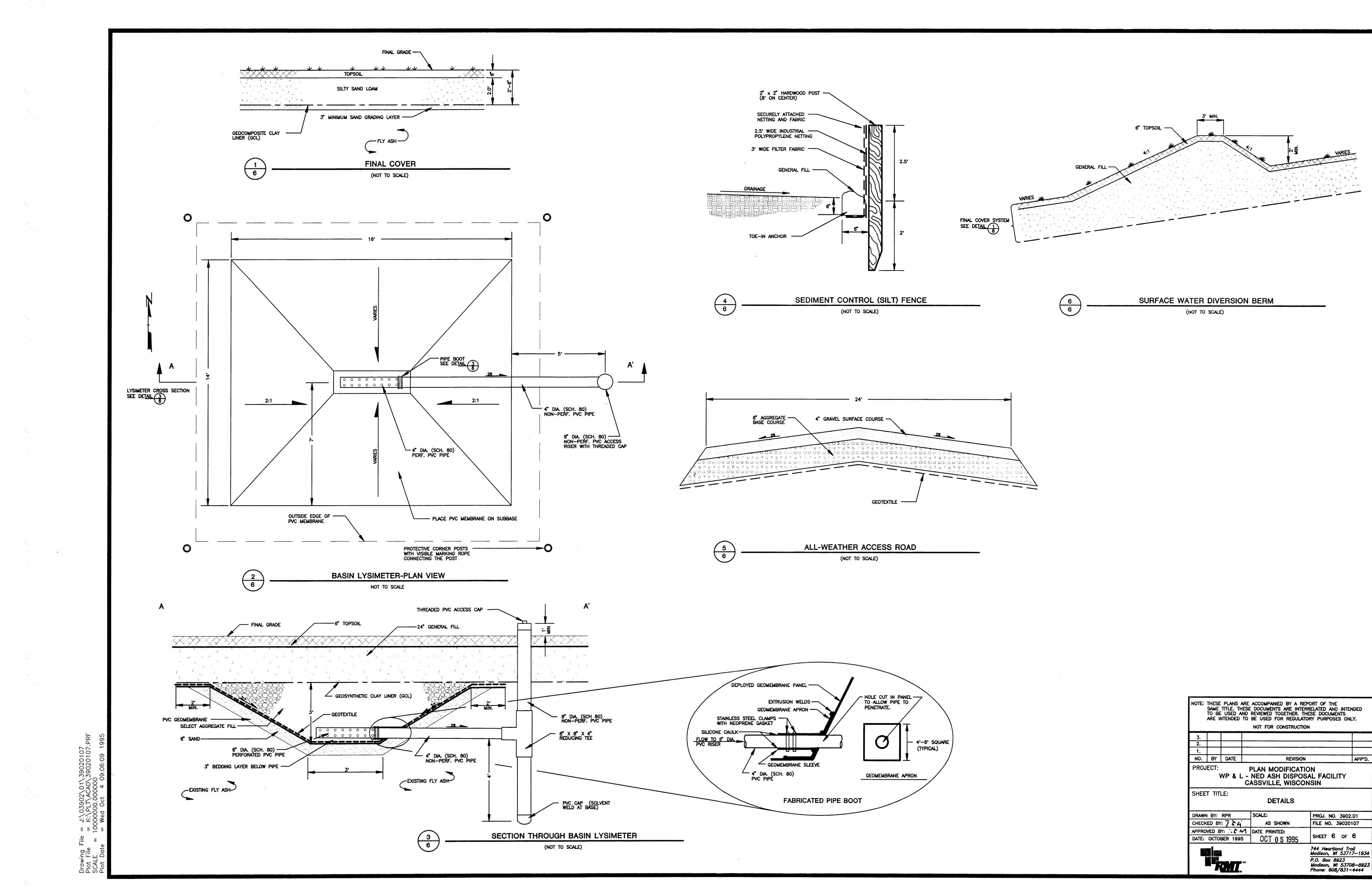
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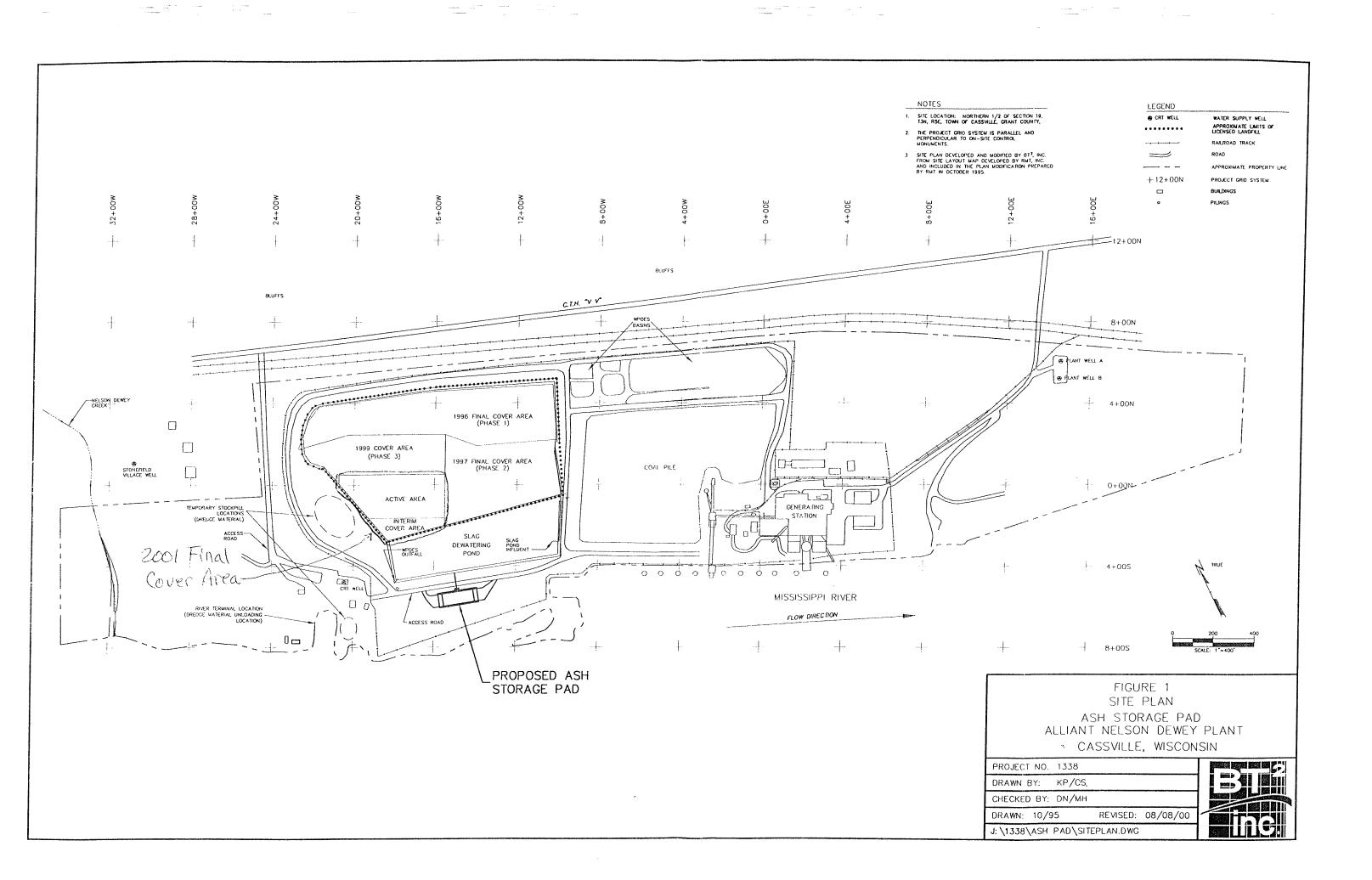
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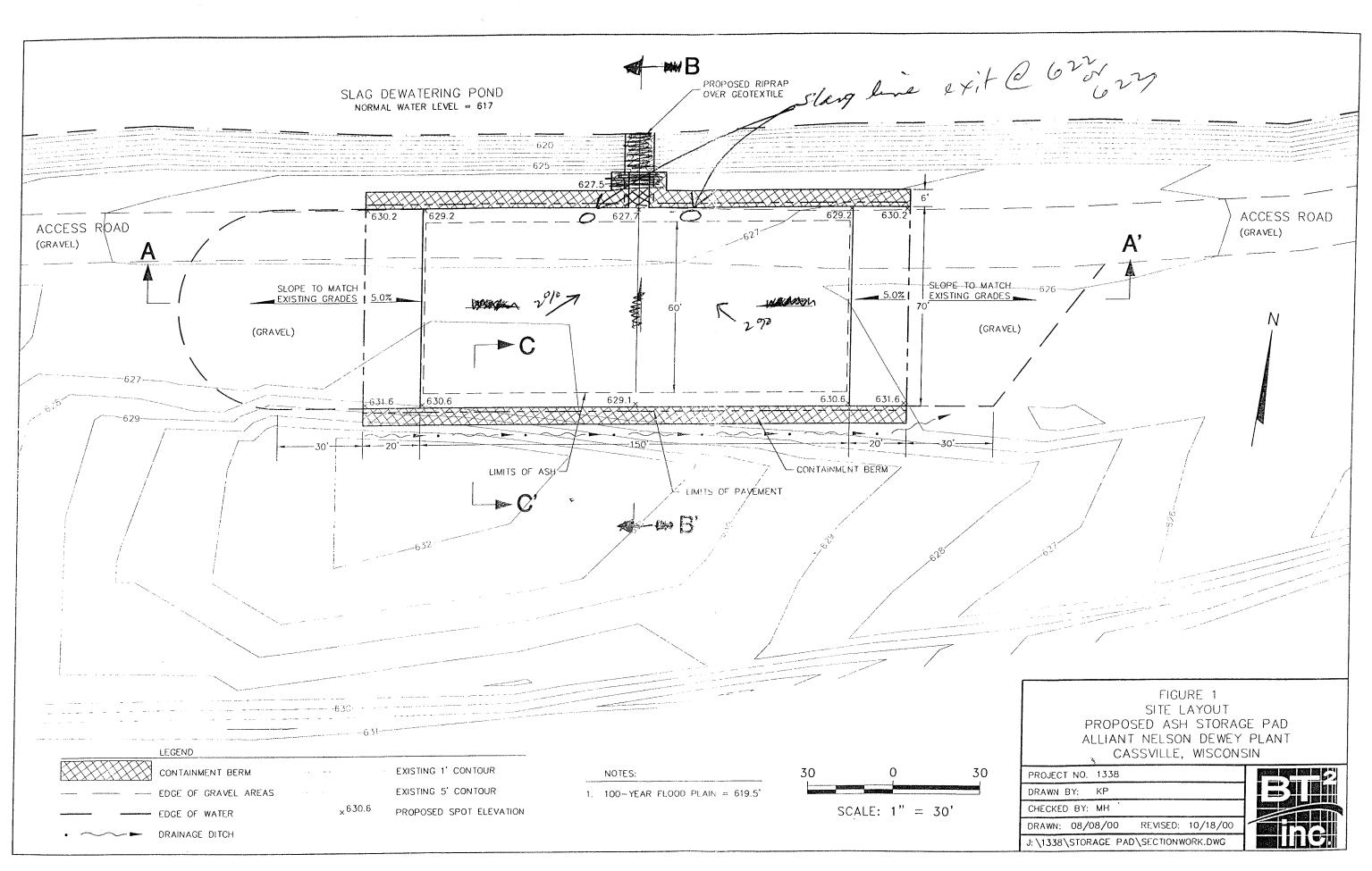


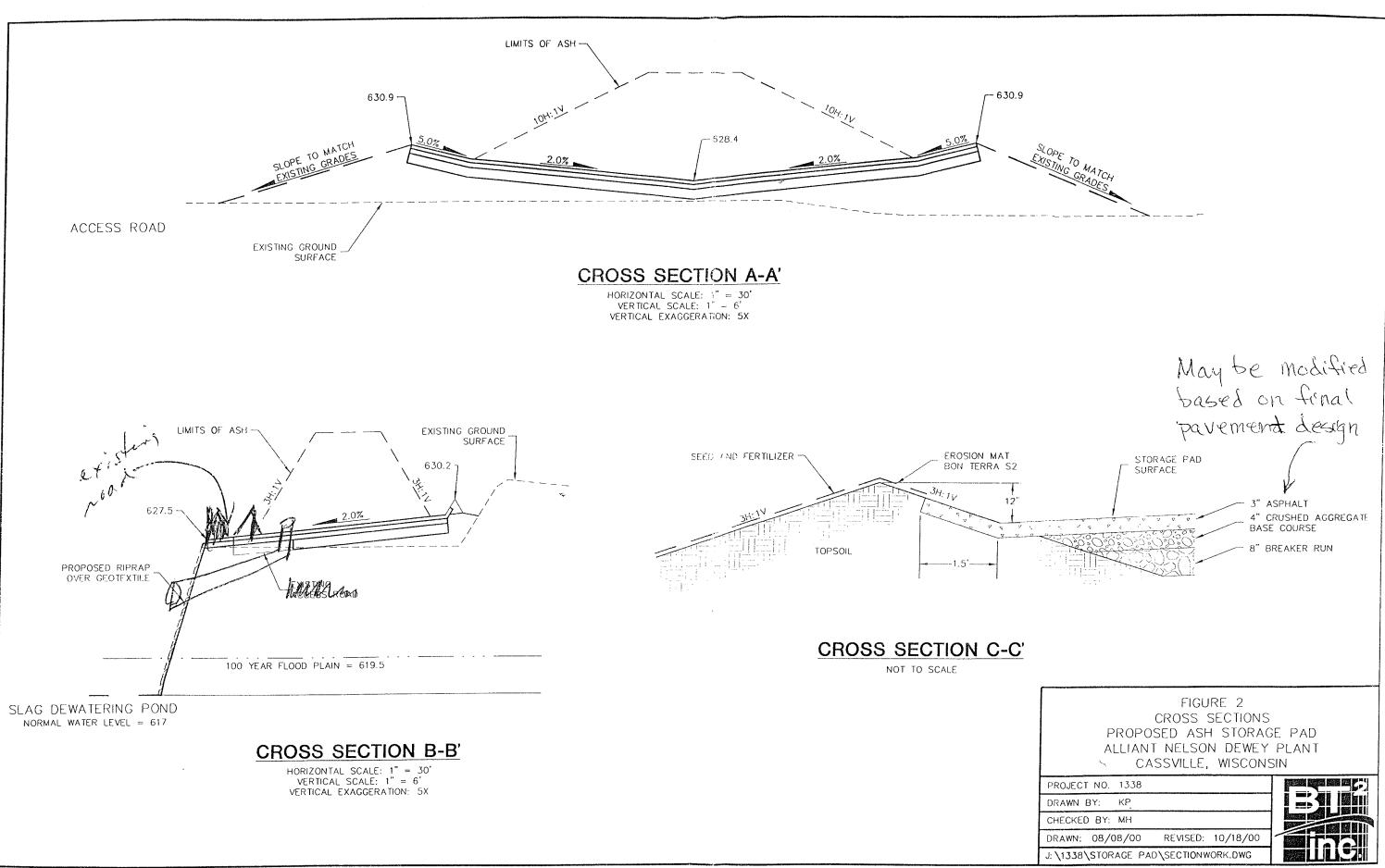
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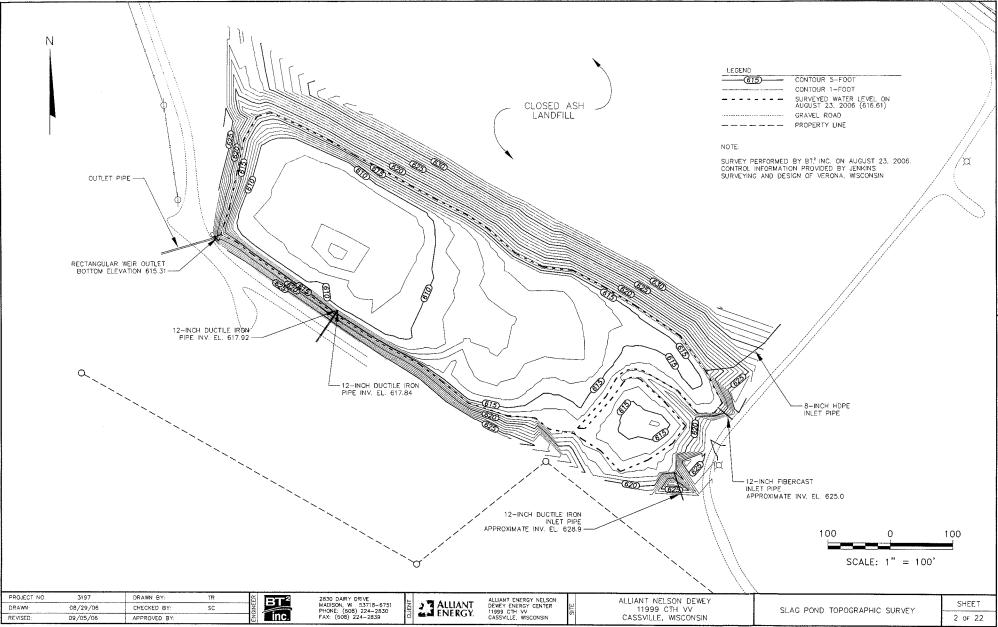




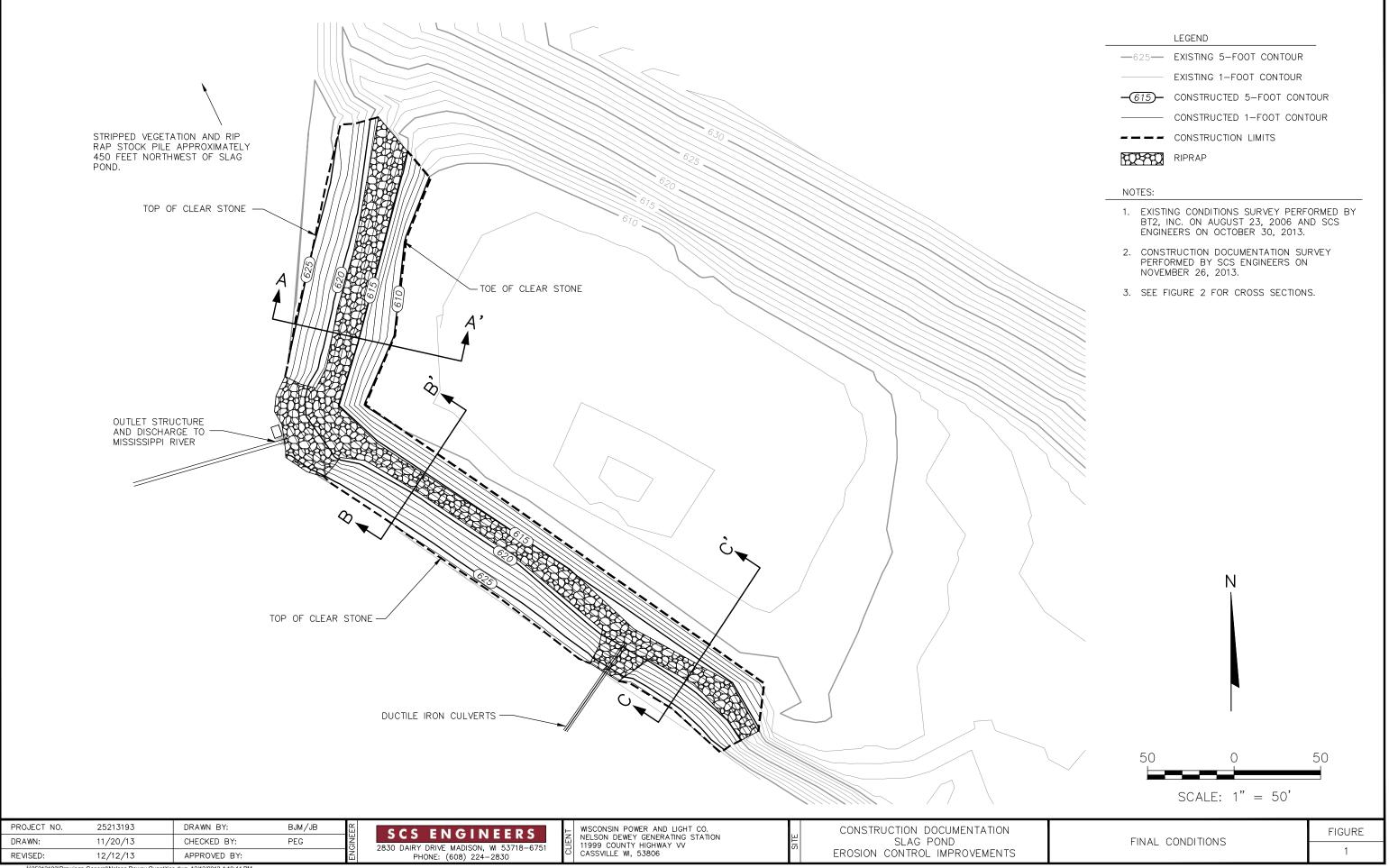






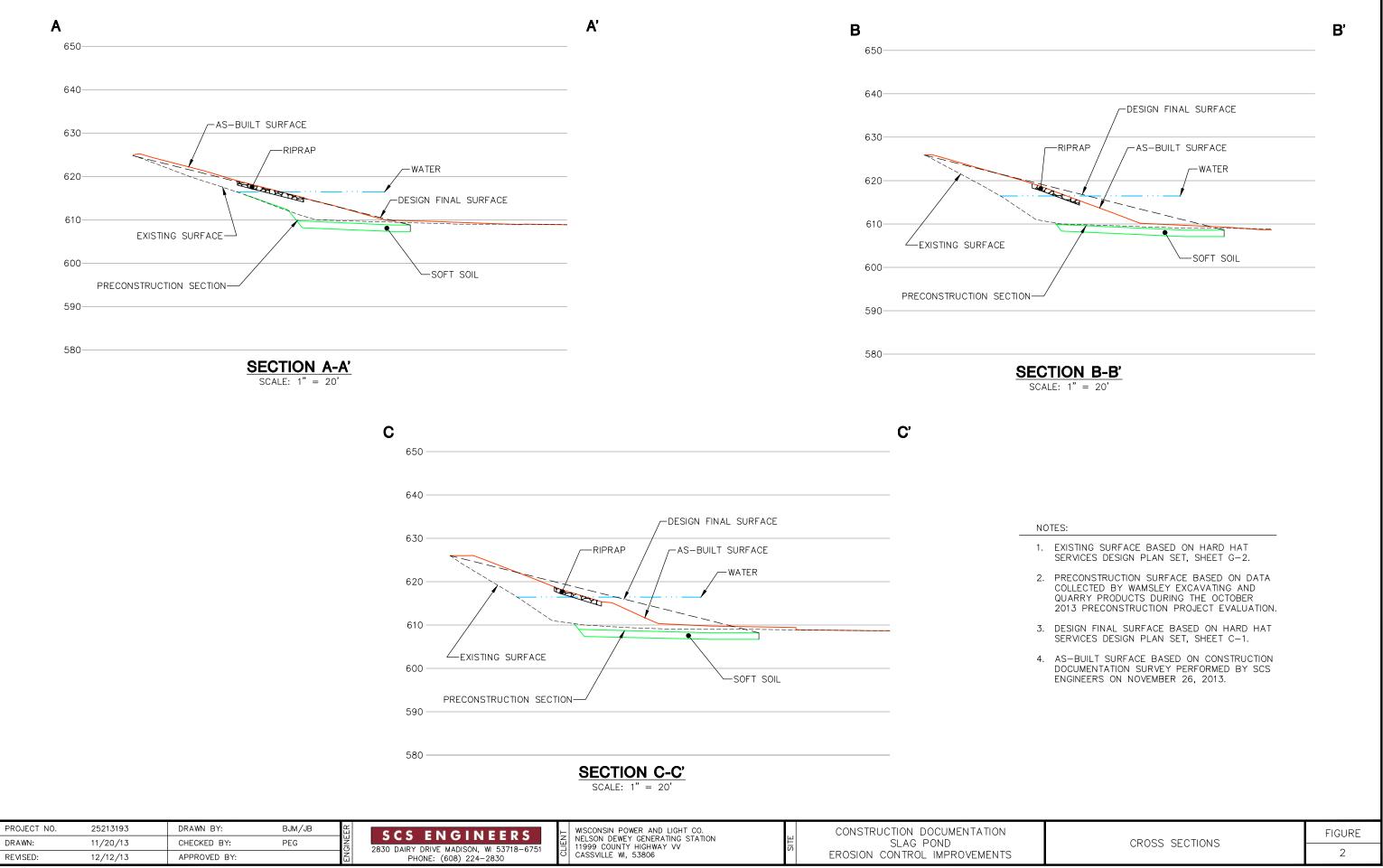


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