



Alliant Energy
4902 North Biltmore Lane
P.O. Box 77007
Madison, WI 53707-1007

1-800-ALLIANT (800-255-4268)
alliantenergy.com

May 19, 2020

To: CCR Operating Record

Re: Annual Progress Report pursuant to 40 CFR 257.103

The existing Coal Combustion Residuals (CCR) surface impoundment at the Ottumwa Generating Station (OGS) will close in accordance with the CCR Closure Plan to meet the requirements of 40 CFR 257.101(b)(1). There is currently an absence of available alternative disposal capacity and CCR will continue to be managed in the CCR Unit until alternative capacity is developed, as allowed under 40 CFR 101(b)(4) and 103(a).

This annual progress report describes the continued lack of alternative capacity and the progress towards the development of alternative CCR disposal capacity. This report has been developed in accordance with 40 CFR 257.103(a) and applies to the following CCR unit at this facility:

CCR Surface Impoundment

OGS Ash Pond

Current Management

The OGS Ash Pond is the primary receiver of sluiced bottom ash and economizer ash. The CCR is sluiced from the generating plant and discharges into the west side of the OGS Ash Pond. The sluiced CCR is discharged into a collection pad area where a dozer pushes the CCR into a stockpile for dewatering. The stockpile is located within the CCR surface impoundment. The water used to sluice the CCR drains into a narrow treatment channel that flows into the southwest portion of the OGS Ash Pond.

On-site Capacity

The OGS Ash Pond is the only existing CCR unit located at this facility capable of receiving wet-generated CCR, and is required to close pursuant to 257.101(b)(1). An inactive CCR unit is also located on site, but it cannot receive CCR after October 19, 2015. In addition, the inactive CCR unit will be closed through removal of CCR in 2020 and re-purposed to manage low volume waste water. There is no other on-site capacity for the management of wet-generated CCR.

Off-site Capacity

Bottom ash and economizer ash are wet-generated at OGS. It is not feasible to transport wet-generated CCR to an off-site facility. (See Federal Register at 80 FR 21423 for discussion on feasibility of transporting wet-generated CCR and applicability of alternative closure requirements.)

Progress Toward Development of Alternative Disposal Capacity

The owner or operator has made, and continues to make, efforts to obtain additional capacity. The facility is currently planning changes to CCR management that will end placement of CCR in the affected unit. Specifically, the facility's National Pollutant Discharge Elimination System (NPDES) wastewater discharge permit requires the installation of a dry bottom ash handling system by June 2022. The

installation of this system will end the placement of wet-generated CCR in the OGS Ash Pond and enable closure of the CCR unit in 2022.

Specific actions taken during this reporting period include:

- Development of detailed pond closure designs and bid specifications.
- Procurement, delivery, and partial construction of dry bottom ash handling system.
- Development of low volume waste water management system.
- Continued environmental permitting related to waste water management and construction activities (NPDES permitting, NPDES progress reports, wetland delineation, evaluations of cultural resources and endangered species).
- Continued compliance with inspection, reporting, recordkeeping, and groundwater monitoring requirements of the CCR Rule.

For more information, please contact the Alliant Energy CCR Rule Compliance Program at CCRprogram@alliantenergy.com.

Signed,



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