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April 17, 2019

To: CCR Operating Record

Re: Notification of Intent to Comply with Alternative Closure Requirements, 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 documentation 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

The following conditions have been met:

- (i) No alternative disposal capacity is available on-site or off-site.

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.)

- (ii) 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 2021. 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.

- (iii) The owner or operator must remain in compliance with all other requirements of this subpart, including the requirement to conduct any necessary corrective action.

The facility remains in compliance with all other requirements of 40 CFR 257 Subpart D. The additional requirements in this subpart include:

- Design Criteria [40 CFR 257.70-74]
- Operating Criteria [40 CFR 257.80-84]
- Groundwater Monitoring and Corrective Action Requirements [40 CFR 257.90-98]
- Closure and Post-Closure Care Requirements [40 CFR 257.100-104]
- Recordkeeping, Notification, and Posting of Information to the Internet [40 CFR 257.105-107]

Documents demonstrating compliance with the requirements of 40 CFR 257 Subpart D are kept in the facility Operating Record and are posted on the Alliant Energy CCR Rule Compliance Data and Information web site: <https://ccr.alliantenergy.com/>

- (iv) The owner or operator must prepare an annual progress report documenting the continued lack of alternative capacity and the progress towards the development of alternative CCR disposal capacity.

No annual progress reports are currently required. IPL will prepare annual progress reports as required by 40 CFR 257.103(c)(2). The first annual progress report will be prepared no later than 13 months after placing this notification in the facility operating record, in accordance with 40 CFR 257.103(c)(2)(i), and subsequent progress reports will be prepared within 12 months of the completing the previous report.

The Notice of Intent to Close has been placed into the facility Operating Record, as required by 40 CFR 257.102(g).

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

Signed,



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