



# Closure Plan for CCR Surface Impoundments – Amendment No. 1



Interstate Power and Light Company

Issue for Use  
Revision 0  
November 16, 2020



# Closure Plan for CCR Surface Impoundments - Amendment No. 1

Prepared for

**Interstate Power and Light Company**

Ottumwa, Iowa

Revision 0  
November 16, 2020

Prepared by

**Burns & McDonnell Engineering Company, Inc.**  
**Kansas City, Missouri**

## INDEX AND CERTIFICATION

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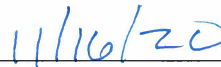
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#### CERTIFICATION

I hereby certify that this engineering document was prepared by me or under my direct personal supervision and that I am a duly licensed Professional Engineer under the laws of the State of Iowa.



(signature)

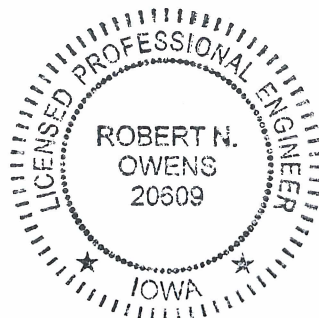


(date)

Typed or Printed Name: Robert N. Owens, P.E.

License number P20609

My License renewal date is December 31, 2020



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## LIST OF ABBREVIATIONS

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
BA	Bottom Ash
BMcD	Burns & McDonnell (IPL's Owner's Engineer)
CCR	Coal Combustion Residual(s)
CCR Rule	Coal Combustion Residuals Rule
CFR	Code of Federal Regulations
IPL	Interstate Power and Light Company (Co-owner and Operator)
EPA	Environmental Protection Agency
GCL	Geosynthetic Clay Liner
IDNR	Iowa Department of Natural Resources
LVWTP	Low Volume Wastewater Treatment Pond
RCRA	Resource Conservation and Recovery Act
S&L	Sargent & Lundy
OGS	Ottumwa Generating Station
ZLD	Zero Liquid Discharge

## **1.0 INTRODUCTION**

Interstate Power and Light Company (IPL) is submitting this Addendum Number 1 (No. 1) to the Closure Plan for the Surface Impoundments at the Ottumwa Generating Station (OGS).

The Initial closure plan was submitted in September of 2016 by Sargent & Lundy in accordance with 40 CFR 257.100(e)(6) and 257.102(b). The Addendum has been prepared by Burns and McDonnell at the request of IPL to revise updates from the original closure plan.

## 2.0 PROPOSED CCR IMPOUNDMENT CLOSURE PROCEDURE

The proposed CCR impoundment closure plan was described in Section 2 of the September 8, 2016 plan developed by Sargent & Lundy. Burns & McDonnell has amended plan as described below.

IPL intends to close the Bottom Ash (BA) Pond in place and close the ZLD Pond by removal and consolidating into the BA Pond. Closure is will occur in the following steps:

### *Zero Liquid Discharge Pond:*

- Dewatering of ZLD Pond by transfer of water to BA Pond,
- Construction of earthen isolation berm around the eastern slope of the fly ash stockpile,
- Closure by removal of residual CCR in ZLD Pond bottom,
- Stripping of in-situ soil in impoundment bottom that may be intermixed with CCR,
- Transfer of CCR and intermixed soil from ZLD Pond to west half of BA Pond,
- Visual examination of area formerly occupied by the surface impoundment to confirm CCR removal,
- Conversion of cleaned out surface impoundment to a storm water and Low Volume Wastewater Treatment Pond (LVWTP) detention pond, and
- Implementing required post-closure groundwater monitoring program.

### *Bottom Ash Pond:*

- Dewatering of BA Pond (following completion of bottom ash handling system and diversion of low volume wastewater flows to LVWTP),
- Fly ash stockpile is to be used as beneficial use and CCR removed from ZLD Pond as fill in BA Pond,
- CCR material will be spread throughout the footprint of the BA Pond,
- Grading of CCR material to final slopes for drainage,
- Installation of cover system materials,
- Installation of drainage control features and,
- Implementing required groundwater monitoring program.

Proposed grades for the capped areas for the BA Pond will range from 2% over the top of the pond to 3H:1V on side slopes of the perimeter drainage ditches. The perimeter drainage ditches will be comprised of Hydroturf which is a material with a geomembrane with an infill of sand and artificial grass.

### 3.0 PROPOSED COVER SYSTEM

The proposed cover system is described in Section 3 of the September 8, 2016 closure plan developed by Sargent & Lundy (Appendix A). The hydraulic conductivity of the compacted 18" thick "infiltration layer" has been modified to be  $1 \times 10^{-7}$  cm/s versus  $1 \times 10^{-5}$  cm/s in Sargent and Lundy's original plan by this Addendum.



#### 4.0 ESTIMATED MAXIMUM INVENTORY OF CCR

The estimated maximum inventory of the CCR in described in Section 4 of the closure plan developed by Sargent & Lundy September 8, 2016 (Appendix A). BMcD has completed a topographical and bathymetric survey in 2019 and amend Table 1 to the following quantities:

<b>Impoundment / Area</b>	<b>Estimated CCR Quantity</b>
ZLD Pond (impounded area)	97,300 cy
Bottom Ash Pond	322,000 cy
Hydrated fly ash stockpile (as of Dec. 2015)	0 cy <sup>1</sup>
<b>TOTAL</b>	<b>419,300 cy</b>

Please note the Hydrated fly ash stockpile has been removed from the quantity as it will be used for beneficial use and not part of the closure plan.

## **5.0 ESTIMATED CLOSURE AREA**

The estimated closure is in Section 5.0 of the Sargent & Lundy initial closure plan dated September 8, 2016 is amended to be approximately 39 acres.

## **6.0 SCHEDULE**

The estimated schedule in Section 6.0 of the Sargent & Lundy initial closure plan dated September 8, 2016 is amended to the schedule provided in Appendix B.

## **7.0 COMPLETION OF CLOSURE ACTIVITIES**

To confirm completion of the surface impoundment closures, IPL will retain a qualified professional engineer licensed in the State of Iowa to verify that the existing CCR surface impoundments have been closed in accordance with this Closure Plan and the requirements of 40 CFR §257.102. The qualified engineer will provide IPL with written certifications stating compliance as required in 40 CFR §257.102(f)(3). A Post-Closure Plan is presented in a separate document.

## **8.0 CERTIFICATIONS**

Robert N. Owens, PE, a licensed professional engineer in the State of Iowa, has overseen the preparation of this Closure Plan Amendment. A certification is provided at the beginning of this document.

## **9.0 RECORDKEEPING AND REPORTING**

The closure plan amendment will be placed in the facility's operating record and on Alliant Energy's CCR Rule Compliance Data and Information website.

Additional amendments to the written closure plan will be done when there is a change in the operation of the CCR unit that affects the plan or when unanticipated events warrant revision to the written closure plan, as required by 40 CFR 102(b)(3)(ii).

IPL will provide notification as follows:

- Intent to initiate closure
- Closure completion
- Availability of the written Closure Plan and any amendments

All notifications will be placed in the facility's operating record and on the website (40 CFR 257.105(i), 257.106(i), 257.107 (i)).

## 10.0 REFERENCES

40 CFR Part 257, Subtitle D – Environmental Protection Agency Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities.

Sargent & Lundy, 2016, Closure Plan for CCR Surface Impoundments, Ottumwa Generating Station, Interstate Power and Light, September 8, 2016.

**APPENDIX A – SARGENT & LUNDY, 2016, CLOSURE PLAN FOR INACTIVE  
CCR SURFACE IMPOUNDMENTS, OTTUMWA GENERATING  
STATION, INTERSTATE POWER AND LIGHT, SEPTEMBER 8,  
2016**

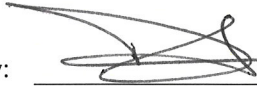
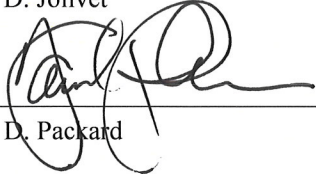
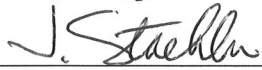




# Closure Plan for CCR Surface Impoundments

Prepared for Interstate Power and Light Company  
Ottumwa Generating Station  
Ottumwa, IA

Issue Date: September 8, 2016  
Issue Purpose: For Use

Prepared by:		09/07/2016
	D. Jolivet	Date
Reviewed by:		09/07/2016
	D. Packard	Date
Approved by:		09/08/2016
	J. Staehlin	Date



### Certification and Seal:

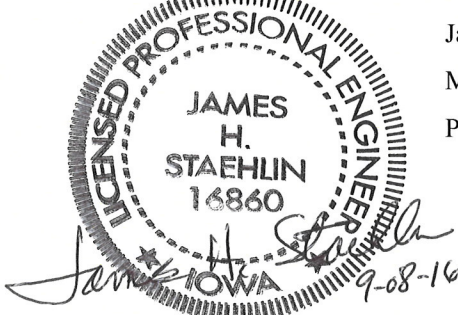
I hereby certify that this engineering document was prepared by me or under my direct personal supervision and that I am a duly licensed Professional Engineer under the laws of the State of Iowa:

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Chicago, IL 60603-5780 USA

Project No. 13391-034

Report No. SL-013390  
Revision: 0

James H. Staehlin  
My license renewal date is December 31, 2016  
Pages covered by this seal: All



9/8/2016  
Sargent & Lundy, L.L.C.



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## **LEGAL NOTICE**

*This report ("Deliverable") was prepared by Sargent & Lundy, L.L.C. ("S&L"), expressly for the sole use of Alliant Energy ("Client") in accordance with the agreement between S&L and Client. This Deliverable was prepared using the degree of skill and care ordinarily exercised by engineers practicing under similar circumstances. Client acknowledges: (1) S&L prepared this Deliverable subject to the particular scope limitations, budgetary and time constraints, and business objectives of the Client; (2) information and data provided by others may not have been independently verified by S&L; and (3) the information and data contained in this Deliverable are time sensitive and changes in the data, applicable codes, standards, and acceptable engineering practices may invalidate the findings of this Deliverable. Any use or reliance upon this Deliverable by third parties shall be at their sole risk.*

## 1. INTRODUCTION

Interstate Power and Light Company (IPL) – a wholly owned subsidiary of Alliant Energy – operates the single 726-MW unit Ottumwa Generating Station (OGS), approximately 9 miles northwest of Ottumwa, Iowa. This facility operates two CCR surface impoundments: the Zero Liquid Discharge (ZLD) Pond and the Bottom Ash (BA) Pond. Additional details on each of these impoundments are given below. The overall layout of the facility is shown in Figure 1.

To comply with the requirements of the USEPA Final CCR Rule (40 CFR §257.50 thru §257.107), Alliant Energy, on behalf of its subsidiary IPL, submits the following Closure Plan detailing the steps to be undertaken to close the existing Bottom Ash Pond by leaving the CCR in place and the ZLD Pond by removal of CCR, in accordance with §257.102(b) of the CCR Rule.

This document provides the following required information:

- Facility information
- Estimate of the maximum inventory of CCR on-site
- Proposed CCR surface impoundment closure procedure
- Description of the proposed final cover system over the CCR material
- Schedule for completing all closure activities

The Bottom Ash Pond, still in use, is managed as an *existing* CCR impoundment under the provisions of the CCR Rule. Additionally, a temporary bottom ash storage pile is located within the confines of the Bottom Ash Pond. The ZLD Pond is currently managed as an *inactive* CCR impoundment since it has not received CCR on or after October 19, 2015. The Station maintains a stockpile of hydrated fly ash, adjacent to the ZLD Pond, which has not received CCR on or after October 19, 2015, and it is beneficially used. The Coal Runoff Pond does not meet the definition of a CCR surface impoundment per the CCR Rule, and as such is not further discussed in this Plan.

### **BOTTOM ASH POND**

The Bottom Ash Pond is located about 800 feet east of the generating unit, and receives sluiced bottom ash and economizer ash, in addition to SCU blowdown flows, oil/water separator discharge, boiler seal water, air heater wash water, sanitary plant effluent, cooling tower blowdown, CCR leachate from the off-site Ottumwa Midland Landfill (OML) and other low volume wastewater (LVWW) streams in addition to collected storm water runoff. The pond also recycles part of its water to feed ash water storage tanks, used in several plant processes. Water from the pond eventually discharges through NPDES Outfall 001 into a tributary to the Des Moines River. The overall impounded pond area occupies approximately 39 acres, however the surface area of the impounded water is only approximately 15 acres with the balance being CCR – OGS stores bottom ash within the overall confines of the Bottom Ash Pond. Station personnel estimate that approximately 50,000 tons of bottom ash are currently stored therein.

It is expected that this surface impoundment will cease receiving CCR flows once the bottom ash conversion is completed on the generating unit by December 2020.

### **ZERO LIQUID DISCHARGE (ZLD) POND**

The ZLD Pond is located northeast of the power block and has been historically used to store sluiced fly ash, stormwater runoff, boiler and air heater wash water, and turbine cleaning wastewater. The surface impoundment does not discharge any of the water it contains, but may contain CCR from historical activities. The area of impounded water is approximately 19 acres.

### **HYDRATED FLY ASH STOCKPILE**

The hydrated fly ash stockpile is situated north of the power block and this stockpile occupies an area of approximately 8 acres.



**Figure 1: Overall Layout at Ottumwa Generating Station**

## 2. PROPOSED CCR IMPOUNDMENTS CLOSURE PROCEDURE

IPL has chosen closure-in-place for the Bottom Ash (BA) Pond and closure through removal of CCR for the Zero Liquid Discharge (ZLD) Pond. The proposed closure of the CCR impoundments at Ottumwa will be done according to the following steps:

### *Zero Liquid Discharge Pond:*

- Installation of groundwater monitoring well network and collection of background samples,
- Dewatering of ZLD Pond by transfer of water to BA Pond,
- Construction of earthen isolation berm around the eastern slope of the fly ash stockpile,
- Closure by removal of residual CCR in ZLD Pond bottom <sup>1</sup>,
- Stripping of in-situ soil in impoundment bottom that may be intermixed with CCR,
- Transfer of CCR and intermixed soil from ZLD Pond to west half of BA Pond,
- Visual examination of area formerly occupied by the surface impoundment to confirm CCR removal,
- Conversion of cleaned out surface impoundment to a storm water and LVWW detention pond, and
- Implementing required post-closure groundwater monitoring program.

### *Bottom Ash Pond:*

- Installation of groundwater monitoring well network and collection of background samples,
- Dewatering of BA Pond (following completion of bottom ash handling system and diversion of low volume wastewater flows),
- Consolidation of fly ash stockpile and CCR removed from ZLD Pond as fill in BA Pond,
- Consolidation of CCR material from east half of BA Pond into west half,
- Maintain cleaned-out east half of BA Pond for storm water runoff and LVWW detention,
- Grading of CCR material to final slopes for drainage,
- Installation of cover system materials,
- Installation of drainage control features and,
- Implementing required groundwater monitoring program.

Proposed final grades for the capped area over the former Bottom Ash Pond will range from a minimum 3% over the upper portion of the cap to a maximum of 4H:1V near the outer edges of the cover, to allow adequate material storage volume. These slopes will allow for adequate drainage of rainwater off the cover system described in Section 3.

The final objective of the closure procedure in the Bottom Ash Pond is to create a consolidated mound of CCR capped by a cover system west of the existing overhead power lines.

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<sup>1</sup> §257.102(c) of the Rule considers closure by removal of CCR to be complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standards established pursuant to §257.95(h) for constituents listed in Appendix IV to the CCR Rule.

The basin to the east will serve as storm water runoff and LVWW detention. These two distinct areas will be separated by a new earthen isolation berm with a gravel access road along its crest.

Storm runoff from the cover system will be directed via ditches and culverts, as required, toward the detention basin. These ditches and outlets will be designed per the requirements of the Iowa Erosion Control Manual published by the Iowa Department of Natural Resources, latest edition.

### 3. PROPOSED COVER SYSTEM

The final cover will meet the minimum requirements of 40 CFR §257.102(b)(3)(i)(A) thru (D). It will consist, from bottom to top, of a compacted 18" thick "infiltration layer" of appropriate low-permeability material having a hydraulic conductivity of no more than  $1 \times 10^{-5}$  cm/s, followed by a 6" thick "erosion layer" of uncompacted soil capable of sustaining a vegetative cover, with a suitable seed mixture.

The underlying CCR material will be graded, stabilized and compacted as required to be able to support the cover system. The overlying final cover materials will be placed and compacted as required to minimize infiltration, limit erosion and future maintenance, and maintain positive drainage. Soil properties, compaction, permeability, and thickness testing will be performed to confirm compliance with the CCR Rule. Regular maintenance of the seeding will take place until the vegetative cover is established and self-sustaining, in order to limit erosion of the topmost layer. All other areas that are disturbed during the pond closure activities will be restored, either by providing a vegetative cover or an aggregate surface.

### 4. ESTIMATED MAXIMUM INVENTORY OF CCR

Based on existing information provided to S&L in the preparation of this Plan, including original plant construction drawings and recent survey data, it is estimated that approximately 1,068,000 cubic yards of CCR are present onsite. This quantity includes the amount of CCR in the hydrated fly ash stockpile. Some variability in the total amount may exist due to fluctuations in the amount of bottom ash stored in the impoundment, and CCR removed for beneficial re-use. A breakdown of this total quantity is given in Table 1.

**TABLE 1: ESTIMATED QUANTITIES OF CCR**

Impoundment / Area	Estimated CCR Quantity
ZLD Pond (impounded area)	165,000 cy
Bottom Ash Pond (excl. temporary bottom ash stockpile)	417,000 cy
Hydrated fly ash stockpile (as of Dec. 2015)	440,000 cy <sup>2</sup>
Temporary bottom ash stockpile	46,000 cy <sup>3</sup>
<b>TOTAL</b>	<b>1,068,000 cy</b>

<sup>2</sup> Based on 475,000 tons with a unit weight of 1.08T/cy or 80lbs/ft<sup>3</sup>

<sup>3</sup> Based on 50,000 tons with same unit weight as Note 1

In the above table, the total amount of estimated CCR was determined by comparing the original contours of the ash disposal area to contours from more recent surveys. Changes in the amount of CCR since these surveys is unknown however bathymetric and topographic surveys are being planned at this time. Results of the new survey will be incorporated into the next revision of this document.

## 5. ESTIMATED MAXIMUM AREA OF COVER

Per the above proposed closure sequence, it is estimated that approximately 20 acres of the western half of the Bottom Ash Pond will require a cover system over the CCR material.

## 6. SCHEDULE

Closure of the existing Zero Liquid Discharge Pond and the Bottom Ash Pond is anticipated to require approximately 2 years. The schedule provided in Table 2 estimates a closure initiation date of March 1, 2021, following bottom ash handling conversion that is anticipated by the end of 2020, with a completion of closure by the end of 2022. Alliant Energy will obtain certification from an Iowa licensed professional engineer that each impoundment was closed in compliance with the approved Closure Plan. These certifications will be placed in the Station's operating record within 30 days of completing closure.

**TABLE 2: PLANNING LEVEL SCHEDULE FOR CLOSURE OF ZLD AND BA PONDS**

Task Description	Anticipated Start Date	Anticipated Completion Date
<b>Pre-Design Activities</b>		
Preparation of <i>Closure Plan</i> for compliance with Federal CCR Rule	04/16/2016	10/16/2016
Post <i>Closure Plan</i> in the Station's Operating Record	10/16/2016	10/16/2016
Send a Notification of the availability of the Closure Plan to the Relevant State Director and post <i>Closure Plan</i> to the Station's Internet Website	10/16/2016	11/15/2016
Place <i>Post-Closure Plan</i> in the Station's Operating Record	10/16/2016	10/16/2016
Send Notification of availability of <i>Post-Closure Plan</i> to the State Director and post <i>Post-Closure Plan</i> to the Station's Internet Website	10/16/2016	11/15/2016
<b>Design / Bidding / Permitting</b>		
Site Survey & Bathymetric Survey	08/01/2016	09/30/2016
Engineering / Preparation of Bid docs / Closure Permit Application	04/01/2020	07/31/2020
Issue Request for Bids	08/01/2020	08/01/2020
Bids due	08/31/2020	08/31/2020
Bid Evaluation Period	09/01/2020	09/31/2020
Issue Award and Notice to Proceed	11/01/2020	12/31/2020



Task Description	Anticipated Start Date	Anticipated Completion Date
<b>Construction</b>		
Place a <i>Notification of Intent to Close</i> the Surface Impoundments in the Station's Operating Record	01/2021	01/2021
Send <i>Notification of Intent to Close</i> to State Director and post Notification to the Station's Internet Website	02/2021	02/2021
<b><i>Initiation of ZLD Pond Closure</i></b>	03/2021	03/2021
Contractor Mobilization	03/2021	03/2021
Dewatering of CCR Impoundment	03/2021	07/2021
(Optional) Transfer of Fly Ash Pile to BA Pond	04/2021	09/2021
Removal of CCR from ZLD impoundment – transfer to BA Pond	07/2021	10/2021
Restoration of Fly Ash Pile Area (final vegetated cover)	09/2021	11/2021
Groundwater monitoring to complete closure	11/2021	03/2022
<b><i>Initiation of BA Pond Closure</i></b>	03/2022	03/2022
Dewatering of CCR impoundment	03/2022	07/2022
Consolidation of CCR in west half of impoundment - grading	04/2022	09/2022
Installation of final vegetated cover system	06/2022	10/2022
Post-closure groundwater monitoring	11/2022	11/2052
<b>Post-Construction Administration – ZLD Pond</b>		
Certification verifying the completion of closure in accordance with the Closure Plan	03/2022	03/2022
Place a Notification of Pond Closure Completion in the Station's Operating Record and post Closure Completion to the Station's Internet Website	03/2022	03/2022
Send Notification of availability of Closure Completion to Relevant State Director	03/2022	03/2022
<b>Post-Construction Administration – BA Pond</b>		
Certification verifying the completion of closure in accordance with the Closure Plan	12/2022	12/2022
Place a Notification of Pond Closure Completion in the Station's Operating Record and post Closure Completion to the Station's Internet Website	12/2022	12/2022
Send Notification of availability of Closure Completion to Relevant State Director	12/2022	12/2022
Record a Notation of the CCR Impoundment Closure on the Deed of the Property	12/2022	12/2022
Place a Notification of the Deed Notation in the Station's Operating Record	12/2022	12/2022





<b>Task Description</b>	<b>Anticipated Start Date</b>	<b>Anticipated Completion Date</b>
Send Notification of availability of Deed Notation to Relevant State Director / place Deed Notation to the Station's Internet Website	12/2022	12/2022
Place a Notification of Completion of the Post-Closure Care in the Station's Operating Record	12/2052	12/2052
Send a Notification of the availability of the Post-Closure Care to the Relevant State Director and place Post-Closure Care to the Station's Internet Website	12/2052	12/2052

## 7. COMPLETION OF CLOSURE ACTIVITIES

To confirm completion of the surface impoundment closures, IPL will retain a qualified professional engineer licensed in the State of Iowa to verify that the existing CCR surface impoundments have been closed in accordance with this Closure Plan and the requirements of 40 CFR §257.102. The qualified engineer will provide IPL with written certifications stating compliance as required in 40 CFR §257.102(f)(3). A Post-Closure Plan is presented in a separate document.

## 8. CERTIFICATIONS

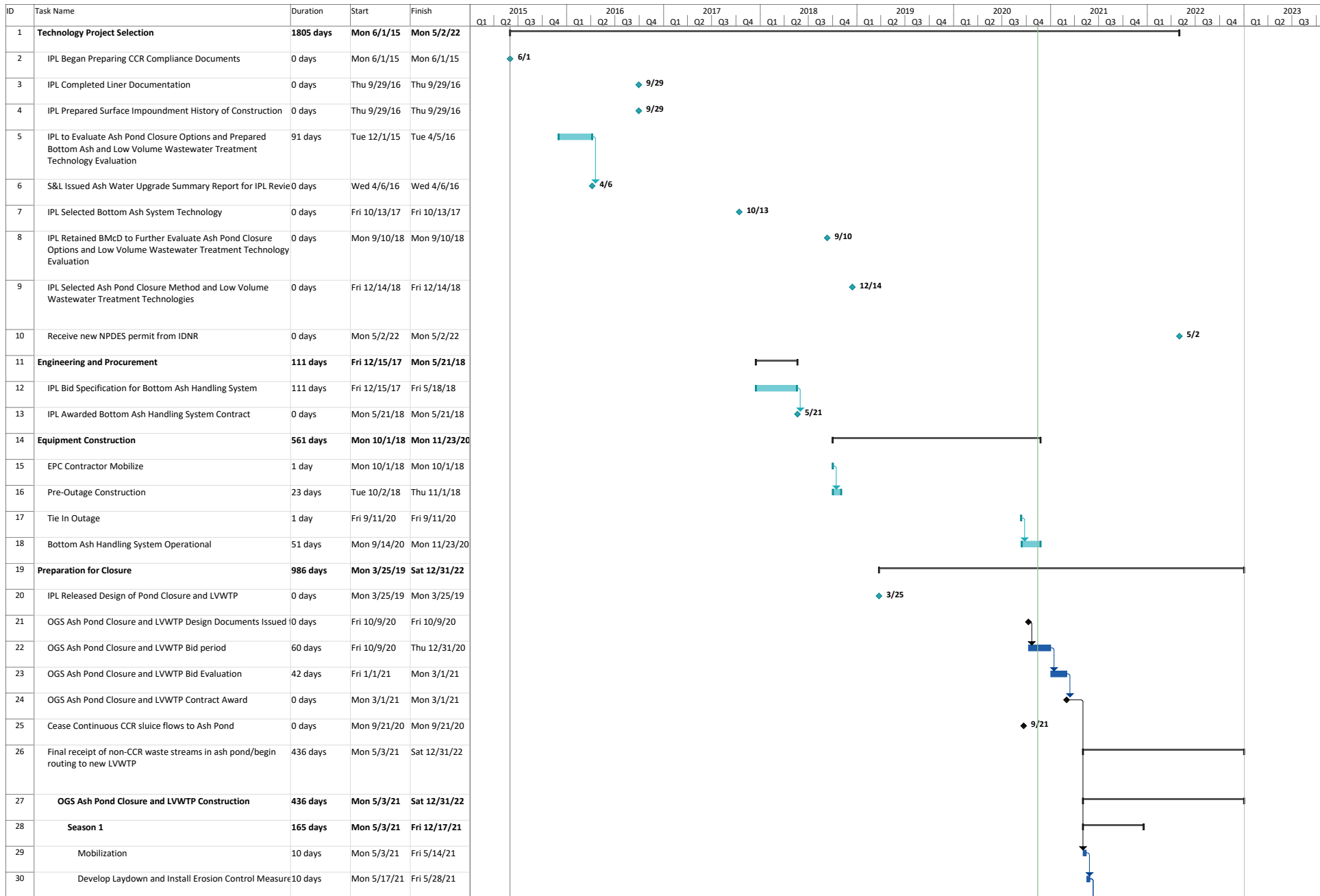
It is S&L's opinion that this written closure plan meets the requirements of 40 CFR §257.102(b).

It is also S&L's opinion that the proposed final cover system as described herein meets the design requirements of 40 CFR §257.102(d)(3)(i).

## 9. REFERENCES

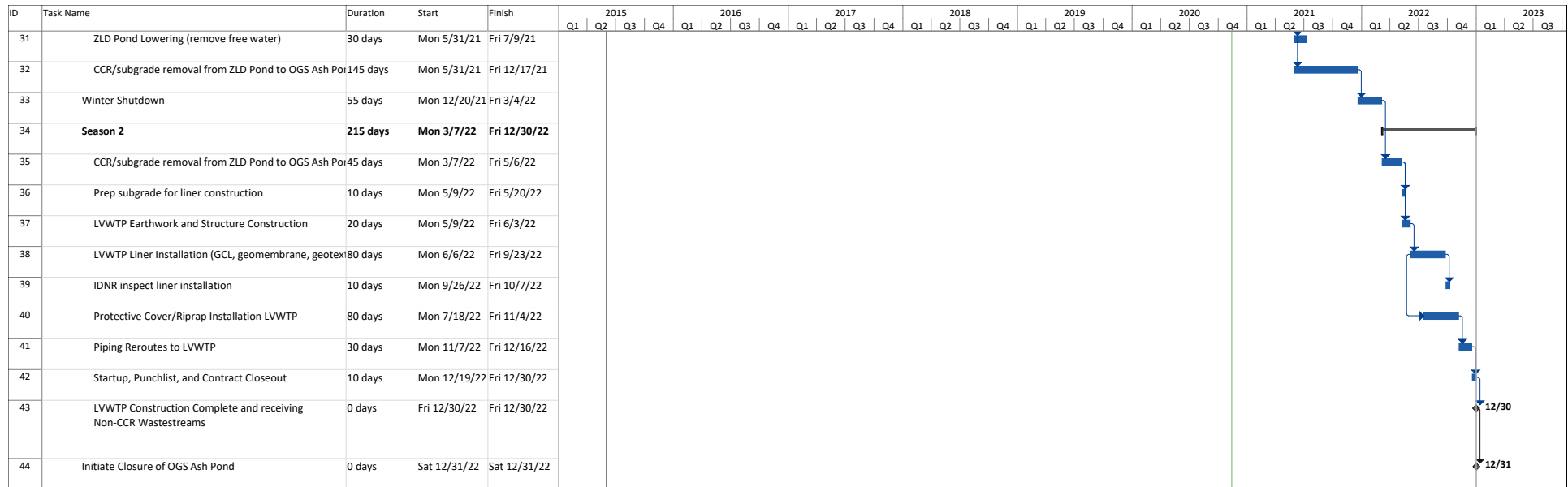
1. 40 CFR Part 257, Subtitle D – Environmental Protection Agency Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, Federal Register, Vol. 80, No. 74.

**APPENDIX B – SCHEDULE**



Project: Surface Impoundment Extension Demonstration Date: Fri 11/13/20	Task	Project Summary	Inactive Milestone	Manual Summary Rollup	Deadline	Manual Summary
	Split	External Tasks	Inactive Summary	Manual Summary	Progress	Manual Progress
	Milestone	External Milestone	Manual Task	Start-only	Manual Progress	Manual Progress
	Summary	Inactive Task	Duration-only	Finish-only	Manual Progress	Manual Progress

\*\*Gaps between seasons indicate winter months.



Project: Surface Impoundment Extension Demonstration  
Date: Fri 11/13/20

Task		Project Summary		Inactive Milestone		Manual Summary Rollup		Deadline
Split		External Tasks		Inactive Summary		Manual Summary		Progress
Milestone		External Milestone		Manual Task		Start-only		Manual Progress
Summary		Inactive Task		Duration-only		Finish-only		

\*\*Gaps between seasons indicate winter months.



CREATE AMAZING.

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