

From: [Huggins, Richard](#)
To: [Maxted, Jeffrey](#)
Cc: [Anderson, Lydia](#); [Celeste, Laurel](#); [Behan, Frank](#); [Catlin, Kelley](#); [Sans, Cynthia](#); [Aston, Robert](#); [Hayworth, Brad](#); [Hanson, Jeffrey](#); [Hoefer, Margaret](#); [Watts, John](#); [Huston, Liz](#)
Subject: [EXTERNAL] RE: Request to Withdraw Ottumwa Part A Demonstration
Date: Tuesday, June 7, 2022 12:19:29 PM

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Good afternoon Jeff,

Thank you for your email that notified EPA that the Main Ash Pond, the unit covered by the CCR Part A demonstration submitted under 40 C.F.R. § 257.103(f)(1) for the Ottumwa Generating Station, ceased receipt of waste on May, 2 2022. As a consequence, Interstate Power and Light Company requested to withdraw the submitted demonstration from EPA review.

EPA reviewed the demonstration and determined that it included the required information, analyses and documentation specified under 40 C.F.R. § 257.103(f)(1), and consequently determined on January 11, 2022 that the demonstration was complete. As a consequence, the deadline for the Main Ash Pond, the CCR unit covered by the demonstration, to cease receipt of waste was tolled throughout the entire period between April 11, 2021 and May 2, 2022, when the unit ceased receipt of waste. See, 40 C.F.R. § 257.103(f)(3)(ii).

Accordingly, EPA has updated the PART A webpage ([linked here](#)) to show that you have ceased receipt of waste, and that EPA will conduct no further review of the demonstration.

Finally, either myself or a representative of EPA Region 7 will contact you to schedule a meeting to discuss groundwater monitoring, corrective action and closure.

Sincerely,

Richard

Richard Huggins Jr., Chief
Energy Recovery and Waste Disposal Branch
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
Desk: 202-566-0543 iPhone: 571-345-6855

From: Maxted, Jeffrey <JeffreyMaxted@alliantenergy.com>

Sent: Friday, May 20, 2022 10:00 AM

To: Huggins, Richard <Huggins.Richard@epa.gov>

Cc: Anderson, Lydia <Anderson.Lydia@epa.gov>; Celeste, Laurel <celeste.laurel@epa.gov>; Behan, Frank <Behan.Frank@epa.gov>; Catlin, Kelley <Catlin.Kelley@epa.gov>; Sans, Cynthia <Sans.Cynthia@epa.gov>; Aston, Robert <Aston.Robert@epa.gov>; Hayworth, Brad <Hayworth.Brad@epa.gov>; Hanson, Jeffrey <JeffreyHanson@alliantenergy.com>; Hoefer, Margaret <MargaretHoefer@alliantenergy.com>; Watts, John <JohnWatts@alliantenergy.com>

Subject: Request to Withdraw Ottumwa Part A Demonstration

Dear Mr. Huggins,

On November 30, 2020, Interstate Power and Light Company (IPL) submitted a complete demonstration to the U.S. Environmental Protection Agency (EPA) that requested approval of a site-specific alternative deadline to initiate closure pursuant to 40 C.F.R. § 257.103(f)(1) for the existing CCR surface impoundment (Main Ash Pond) located at the Ottumwa Generating Station near Ottumwa, Iowa. In that submittal, IPL requested an alternative deadline of December 31, 2022 to continue to receive CCR and non-CCR wastestreams at the Main Ash Pond after April 11, 2021 in order to install new capacity for managing non-CCR wastewaters, including a new low-volume wastewater treatment pond (LVWTP). On January 11, 2022, EPA informed IPL that the demonstration was complete and that the April 11, 2021 deadline to cease receipt of waste was tolled pending a final decision on the application.

Final tie-ins to the LVWTP were completed April 29, 2022 and a new NPDES permit allowing discharges from the pond became effective on May 1, 2022. In addition, CCR leachate from the nearby Ottumwa-Midland Landfill was permitted for disposal at the City of Ottumwa Treatment Works beginning May 2, 2022 and is no longer discharged to the Main Ash Pond. Thus, the Main Ash Pond has permanently ceased receipt of CCR and non-CCR wastewaters as of May 2, 2022. Accordingly, it is no longer necessary for EPA to issue a further extension of the April 11, 2021 deadline to cease receipt of waste at the Main Ash Pond. Therefore, IPL is officially requesting to withdraw the demonstration request that was submitted on November 30, 2020.

Note that IPL has been engaged in conversations with EPA regarding the proposed decision document issued on January 11, 2022 (See docket EPA-HQ-OLEM-2021-0593) and has been working in good faith to answer EPA's questions. For example, IPL has updated the 2017-2019 groundwater monitoring reports in response to EPA comments and remains open to discussing other adjustments. IPL is also actively evaluating an update to the Closure Plan to address EPA comments and operational needs at the facility. We look forward to continued conversations on these topics.

Thank you for your review of this request. Please let me know if you have any questions or concerns.

Sincerely,
Jeff Maxted

Jeff Maxted | Manager – Environmental Services, Generation Operations Support

Pronouns: He/him/his

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