

**From:** [Maxted, Jeffrey](#)  
**To:** [Huggins, Richard](#)  
**Cc:** [Anderson, Lydia](#); [Celeste, Laurel](#); [Behan, Frank](#); [Catlin, Kelley](#); [Sans, Cynthia](#); [Aston, Robert](#); [Hayworth, Brad](#); [Hanson, Jeffrey \(JeffreyHanson@alliantenergy.com\)](#); [Hoefler, Margaret \(MargaretHoefler@alliantenergy.com\)](#); [Watts, John](#)  
**Subject:** Request to Withdraw Ottumwa Part A Demonstration  
**Date:** Friday, May 20, 2022 8:59:00 AM

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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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