

# Post-Closure Plan for Existing CCR Surface Impoundments

Prepared for Interstate Power and Light Company Prairie Creek Generating Station Cedar Rapids, IA

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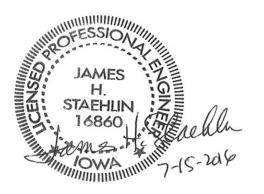
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#### 1. INTRODUCTION & PURPOSE

Interstate Power and Light Company (IPL) – a wholly owned subsidiary of Alliant Energy – operates the four-unit Prairie Creek Generating Station (PCS), located in Cedar Rapids, Iowa. This coal-burning facility operates a system of interconnected ponds that form its Coal Combustion Residual (CCR) treatment facility.

To comply with the requirements of the USEPA Final CCR Rule (40 CFR 257.50 thru 257.107) published on April 17, 2015 and amended on July 2, 2015, Alliant Energy, on behalf of its subsidiary IPL submits the following Post-Closure Plan detailing the steps to be undertaken during the required 30 year post-closure monitoring period in accordance with §257.104 of the Rule.

This document provides the following required information:

- Description of the monitoring and maintenance activities,
- Contact information of responsible entity for closed CCR facility during post-closure care and,
- Description of the planned uses of the property during post-closure period

The Prairie Creek Generating Station currently operates 12 surface impoundments at the site, of which 8 are managed as existing CCR impoundments under the provisions of the CCR Rule. This Post-Closure Plan applies to the following existing CCR surface impoundments:

- PCS Pond 3
- PCS Pond 4
- PCS Pond 5
- PCS Pond 6
- PCS Pond 7
- PCS Discharge Pond (Pond 8)

Per the Closure Plan developed for the CCR surface impoundments at this Station, Ponds #1 and #2 are to be closed through removal of CCR. As such, Ponds #1 and #2 are not subject to post-closure care requirements per §257.104(a)(2) and are not discussed herein. In addition, the two bottom ash piles (CCR Piles) that are regulated as CCR Landfills will also be closed through removal of CCR and are not subject to post-closure care requirements. Ponds #9 thru #11 as well as the coal runoff ponds are also not subject to post-closure care requirements since they are not designed to hold, treat, or dispose of CCR.

The current location of the various impoundments is provided for reference in Figure 1.



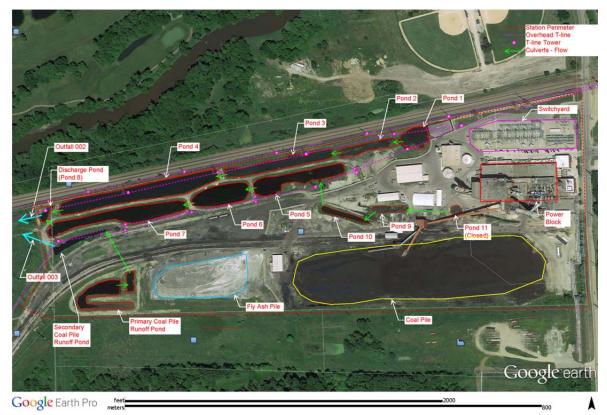


Figure 1: Current Layout of Impoundments at Prairie Creek Generating Station

# 2. DESCRIPTION OF MONITORING / MAINTENANCE ACTIVITIES

The following table outlines the maintenance and monitoring activities to be undertaken during the 30-year post-closure care period, as required by 257.104(d)(1)(i) of the CCR Rule.

| Monitoring and Maintenance Activities                             | Frequency  |
|---|--|
| Mow Vegetation  | Semi-annually (minimum)  |
| Visual Inspection by Plant Personnel                              | Monthly (minimum)  |
| Visual Inspection and Report by Licensed<br>Professional Engineer | As necessary   |
| Repair of Vegetative Cover  | As necessary   |
| Repair of Final Cover System                                      | Following observance of settlement, subsidence, erosion, or other events |
| Inspect Groundwater Monitoring System                             | Monthly  |
| Repair of Groundwater Monitoring System                           | Following observance of an issue   |
| Monitor the Groundwater   | Semi-Annually  |



#### 2.1 Mowing

The Station will perform regular mowing of the final cover system vegetation. Mowing will be performed on a semi-annual basis unless more frequent mowing is required to accommodate higher vegetation growth rates.

#### 2.2 Visual Inspections by Owner / Operator

At a minimum, the Owner/Operator of the closed CCR units shall visually inspect the closure area on a monthly basis to identify any problem areas such as erosion, subsidence, settlement or other events. The monthly visual inspection will also include an inspection of the groundwater monitoring system to visually assess the condition of the protective casing and cover system. If problems are observed with the vegetative cover, actions will be taken to reseed the area and maintain the erosion protection provided by the vegetation. Should the monthly inspection identify issues concerning the final cover system or the groundwater monitoring system, actions will be taken to make repairs in accordance with the original design.

#### 2.3 Visual Inspection and Report by Certified Professional Engineer

Should the visual inspections by plant personnel indicate potential concerns regarding the integrity of the final cover, a detailed inspection of the closed CCR units will be performed by a licensed professional engineer. The professional engineer will visually inspect the surface and side slopes of the closed impoundments to identify any problem areas such as erosion, subsidence, settlement or other events.

### 2.4 Groundwater Monitoring

The Station will maintain the groundwater monitoring system and monitor groundwater quality in accordance with the requirements of 40 CFR 257.90 through 257.98. Groundwater monitoring will be performed on a semi-annual basis in accordance with 40 CFR 257.94(b) and recordkeeping in accordance with the requirements of 40 CFR 257.94(f).

#### 3. CONTACT INFORMATION FOR POST-CLOSURE CARE

As required by 257.104(d)(1)(ii) of the CCR Rule, the following contact information is provided if the need arises to discuss the contents or adequacy of this Post-Closure Plan with Station personnel:

Prairie Creek Generating Station Attn: Plant Manager 3300 C St. SW Cedar Rapids, IA 52404 (319) 786-8440 CCRProgram@alliantenergy.com



#### 4. PROPERTY USE DURING POST-CLOSURE CARE PERIOD

Per the requirements of 257.104(d)(1)(iii) of the CCR Rule, the intended use of the closed CCR units at this facility – as of the issue date of this Plan – is to remain a natural, undisturbed vegetated area.

## 5. CERTIFICATIONS

It is S&L's opinion that this written post-closure plan meets the requirements of 40 CFR 257.104(d).

#### 6. REFERENCES

1. 40 CFR Part 257, Subpart 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, Friday April 17, 2015, as amended by the Technical Amendments published in the Federal Register on July 2, 2015.