solutions and action

Wisconsin Power and Light Company
Rock River Generating Station
CCR Surface Impoundment - Emergency Action Plan
154.018.028.006.003
Plan issued: May 6, 2026

Hard Hat Services
ph: 877-630-7428
hardhatinc.com
245 Kenilworth Ave
Glen Ellyn, IL 60137

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WISCONSIN POWER AND LIGHT COMPANY

FORMER ROCK RIVER GENERATING STATION

827 W. B. R. Townline Road in Beloit, Wisconsin

This Emergency Action Plan has been prepared to identify potential emergency conditions and specify preplanned actions to be followed to minimize loss of life, environmental damage, and property damage. To the best of my knowledge, all information contained in this document is correct, and I am authorized to implement and approve this Emergency Action Plan.

SIGNATURE: Abdul Abdi

NAME: Abdul Abdi

TITLE: Senior Operations Manager

DATE: 05/08/2026

1. EMERGENCY RESPONSE

1.1 EAP Personnel and Responsibilities (§257.73(a)(3)(i)(B))

The roles and responsibilities of the personnel who discover a safety emergency event and who implement this Emergency Action Plan (EAP) are defined in Table 1-1 at the end of this section.

Contact information of EAP personnel is provided in the facility's Emergency Notification Chart (Appendix D).

1.2 EAP Activation (§257.73(a)(3)(v))

This EAP must be implemented once events or circumstances involving the Coal Combustion Residual (CCR) surface impoundment that represent a safety emergency event are detected, which may include conditions identified during inspections by a qualified person, during an annual inspection by a qualified Professional Engineer (PE), and during periodic technical assessments (e.g., structural stability assessment) of the CCR surface impoundment.

1.3 Safety Emergency Events (§257.73(a)(3)(i)(A))

Safety emergency events are unique to each CCR surface impoundment and, to the extent possible, are identified within this EAP. Events or circumstances that represent a safety emergency event are categorized into three levels, which are identified as follows:

- Non-failure: A non-failure safety emergency event level is appropriate for a safety emergency event that will not, by itself, lead to a failure, but requires investigation and notification of internal and/or external personnel. Generally, non-failure safety emergency events shall be identified and resolved in accordance with the Alliant Energy (AE) Inspection and Maintenance (I&M) Plan.
- Potential failure: A potential failure safety emergency event level indicates conditions are developing at the CCR surface impoundment that could lead to a failure.

- Imminent failure: An imminent failure safety emergency event level indicates a CCR surface impoundment has failed, is failing, or is about to fail. Imminent failures likely involve a continuing and progressive loss of embankment material from the CCR surface impoundment.

Examples of non-failure, potential failure, and imminent failure safety emergency events are identified in Table 1-2 at the end of this section.

1.4 Response Action and Notification Process (§257.73(a)(3)(i)(B) and §257.73(a)(3)(i)(C))

If a potential or imminent failure safety emergency event is detected, the following steps shall be taken:

- Discoverer of the safety emergency event shall assess the area to ensure no other on-site personnel are in danger. If so, the area should be cleared IMMEDIATELY.
- Discoverer shall IMMEDIATELY notify the facility manager, or designee.
- The facility manager, or designee, shall utilize the response action and notification checklist, provided in Table 1-3 at the end of this section, to confirm all necessary response actions and notifications are conducted.
- The facility manager, or designee, shall document the identification, notification, and response actions of the safety emergency event per Corporate Procedure ENV-107 “Environmental Incident Reporting and Tracking”.

Contact information for local emergency responders, as well as local/state/federal regulators, is identified on the facility’s Emergency Notification Chart.

A list of example response actions that may be taken to address a potential failure safety emergency event is provided in Table 1-4 at the end of this section.

1.5 Evacuation and Assembly Procedures

In the event of imminent failure, evacuation procedures may be implemented by the facility manager, or designee. Evacuation may include both on-site personnel and public that may be affected by the safety emergency event. The following steps should be taken if evacuation is necessary:

- Notify emergency responders of the imminent failure and potential impacts.
- Use on-site communication systems to instruct on-site personnel, contractors, and visitors to evacuate and assemble in the nearest designated assembly location, as identified in Figure 3.
- Conduct roll call at the assembly locations.

1.6 Safety Emergency Event Termination and Post-Response Action Assessment

A safety emergency event may only be terminated if a potential failure or imminent failure safety emergency event no longer poses a threat to public or on-site personnel.

Termination of a safety emergency event, for on-site personnel, shall be the responsibility of the facility manager, or designee. Termination shall only be determined once the facility manager, or designee, has consulted with the local emergency responders, AE Environmental Services, and other involved emergency response entities such as engineers, emergency response contractors, and local/state/federal regulators.

The local emergency responders shall be responsible for terminating the emergency response and any public evacuation.

Following the termination of a safety emergency event the facility manager, or designee, in coordination with local emergency responders (if applicable), shall conduct an evaluation of the

safety emergency event including all emergency response participants. At a minimum, the following should be discussed and evaluated in a post-emergency response action assessment:

- Events or conditions leading up to, during, and following the safety emergency event;
- Significant actions taken by each participant and improvements for future safety emergency events;
- All strengths and deficiencies observed in the safety emergency event management process, materials, equipment, staffing levels, and leadership; and
- Corrective actions identified and a timeline to implement assigned recommendations.

The results of the post-emergency response action assessment shall be documented per Corporate Procedure ENV-107 “Environmental Incident Reporting and Tracking,” and shall be used as a basis for any necessary revisions to this EAP.

Table 1-1. EAP Personnel and Responsibilities

Personnel	Responsibilities
Discoverer	• Assess the area to ensure no on-site personnel are within the vicinity of the identified safety emergency event • IMMEDIATELY notify the facility manager, or designee
Facility Manager or Designee	• Implement the EAP once a safety emergency event is detected • Determine the level of the safety emergency event • Notify AE Environmental Services and provide regular status report updates • Notify local emergency responders based on the safety emergency event level and provide regular status report updates • Implement response actions • Document the detection, notification, and response actions per Corporate Procedure ENV-107 “Environmental Incident Reporting and Tracking” • Implement evacuation procedures as necessary • Terminate a safety emergency event once resolved • Complete a post-emergency response action assessment and document per Corporate Procedure ENV-107 “Environmental Incident Reporting and Tracking” • Coordinate annual meetings with local emergency responders • Coordinate EAP training and exercises • Review and update the EAP on an annual basis • Signatory authority of the EAP and any amendments
AE Environmental Services	• Assist in EAP training and exercises • Assist with determining the safety emergency event level • Notify local, state, and federal regulators, as needed • Assist with post-emergency response action assessments

Table 1-2. Example Safety Emergency Events

Event	Situation	Level
Embankment Overtopping	Elevated water level higher than the normal operating level and has the potential to overtop an embankment	Potential
	Uncontrolled release of CCR and/or CCR wastewater over the crest of an embankment	Potential
	Sudden or rapid loss of embankment material during an uncontrolled release of CCR and/or CCR wastewater from embankment overtopping or erosion	Imminent
Seepage	New seepage or leakage on the downstream slope of an embankment	Non-failure
	Localized seepage or boil(s) along the downstream slope of an embankment with a muddy/cloudy discharge and increasing but controllable discharge of water	Potential
	Seepage along the downstream slope of an embankment with a muddy/cloudy discharge and uncontrollable discharge of water	Imminent
Embankment Cracking, Movement, or Deformation	New cracks in an embankment with no seepage	Non-failure
	Visual movement/slippage of an embankment slope	Non-failure
	New longitudinal or transverse cracking along an embankment that increase with time and produces observable seepage	Potential
	Concave cracks on or near an embankment crest associated with slope movement	Potential
	Deep slides/erosion on an embankment that may extend beyond an embankment toe	Potential
	Sudden or rapid slide of an embankment slope	Imminent
Sinkholes	Sinkholes, or small depressions, observed on an embankment or near the toe of an embankment	Potential
	Rapidly enlarging sinkhole	Imminent
Instruments	Discernible or significant changes detected in instrumentation readings	Non-failure
Seismic Activity	Measurable seismic activity felt/reported within the surrounding community of the topographic region and resulted in no visible embankment damage	Non-failure
	Measurable seismic activity felt/reported within the surrounding community of the topographic region and resulted in visible embankment damage	Potential
	Measurable seismic activity felt/reported within the surrounding community of the topographic region and resulted in uncontrolled release of CCR and/or CCR wastewater	Imminent
Security Threat	Presence of unauthorized personnel that have caused damage that could adversely impact impoundment operations	Non-failure
	Sabotage or other criminal action with significant damage to an embankment or structures where the integrity is compromised, and repairs are required	Potential
	Sabotage or other criminal action with significant damage to an embankment or structures where damage has resulted in uncontrolled release of CCR and/or CCR wastewater	Imminent
Hydraulic Structure	Debris within a hydraulic structure (i.e., pipe, manhole, channel, spillway, etc.) that may adversely affect impoundment operations	Non-failure
	Hydraulic structure which has significant deterioration, deformation, distortion, bedding deficiencies, sedimentation, or blockage that have adversely affected impoundment operations	Potential

Table 1-3. Response Action and Notification Checklist

STEP 1. Detection and Evaluation	Yes	No
Did the discoverer clear the area of all on-site personnel?	☐	☐
Did the discoverer notify the facility manager?	☐	☐
Has the facility manager or designee confirmed the area was clear of all on-site personnel?	☐	☐
Has the facility manager or designee assessed the area and identified the cause?	☐	☐
Has the facility manager or designee notified AE Environmental Services?	☐	☐
Has the facility manager or designee determined the level of the safety emergency event? If Yes, circle the determined level: Non-Failure / Potential Failure / Imminent Failure *[If determined to be potential or imminent failure, utilize checklists below. A non-failure shall be resolved in accordance with the I&M PLANs]*	☐	☐
STEP 2. Potential Failure – Response Action and Notification	**Yes**	**No**
Can on-site equipment/materials/supplies be utilized safely to address the safety emergency event?	☐	☐
Should local emergency responders be notified? *[If yes, determine which local emergency responders. See Emergency Notification Chart for contact information]*	☐	☐
Should local/state/federal regulators be notified? *[If yes, determine which regulators. See Emergency Notification Chart for contact information]*	☐	☐
Should emergency response contractors be contacted to assist with response actions? *[If yes, determine which emergency response contractor based on the required response actions]*	☐	☐
Should an engineering assessment be completed? *[If yes, determine the appropriate engineer based on the safety emergency event]*	☐	☐
Does the safety emergency event level require modification from potential failure to imminent failure? *[If yes, utilize the imminent failure response action and notification checklist identified below]*	☐	☐

Table 1-3. Response Action and Notification Checklist (Cont.)

STEP 3. Imminent Failure – Response Action and Notification	Yes	No
Have on-site personnel, contractors, and visitors been notified to evacuate the affected areas and assemble in the designated assembly locations?	☐	☐
Have local emergency responders been notified of the imminent failure? *[See the facility Emergency Notification Chart for contact information]*	☐	☐
Have local/state/federal regulators been notified of the imminent failure? *[See the facility Emergency Notification Chart for contact information]*	☐	☐
STEP 4. Documentation and Termination	**Yes**	**No**
Has the safety emergency event been addressed so that there is no longer a potential or imminent failure? *[If yes, terminate the safety emergency event]*	☐	☐
Has a post-response action assessment of the safety emergency event been completed? *[See Corporate Procedure ENV-107 "Environmental Incident Reporting and Tracking" for documenting the post-response action assessment]*	☐	☐

Table 1-4. Example Response Action Options – Potential Failure

Event	Description	Example Response Action Options
High Water Level	Water level is higher than normal operating level and has potential to overtop an embankment	• Inspect for signs of embankment overtopping, as well as erosion of embankment material along the crest and downstream slope. • Utilize on-site equipment/materials/supplies to respond to the safety emergency event. o If operations allow, reduce or reroute storm water and/or process wastewater flows from discharging into the impoundment. o If available, utilize portable water pump(s) for lowering the surface water elevation. • Contact emergency response contractor(s) to assist with emergency response actions. • Contact engineer to conduct assessment. Following the assessment, implement a response plan.
Embankment Overtopping	Uncontrolled release of CCR and/or CCR wastewater over an embankment crest	• Inspect for signs of embankment erosion and for sudden or rapid loss of embankment material. • Utilize on-site equipment/materials/supplies to respond to the safety emergency event. o If operations allow, reduce or reroute storm water and/or process wastewater flows from discharging into the impoundment. o If available, utilize portable water pump(s) for lowering the surface water elevation. • Contact engineer to conduct assessment. Following the assessment, implement a response plan. • Contact emergency response contractor(s) to assist with emergency response actions. • Contact engineer to conduct assessment. Following the assessment, implement a response plan.
Seepage	Localized seepage or boil(s) along the downstream slope of an embankment with a muddy/cloudy discharge and increasing but controllable discharge of water	• Inspect for signs of depressions, seepage, sinkholes, cracking, movement, and presence/absence of muddy discharge. • Demarcate the area, document the location, and take photographs. Record dimensions and relative location to existing surface features. • Utilize on-site equipment/materials/supplies to respond to the safety emergency event. o Place ring of sandbags, with weir at the top, towards the natural drainage path. Contain flow in such a manner that flow rates can be measured. o If necessary, stockpile fill material for later use. • Collect piezometer data, surface water level elevations, and seepage flow rate data. Monitor the embankment and record any change in conditions. • Contact emergency response contractor(s) to assist with emergency response actions. • Contact engineer to conduct assessment, which may include a geotechnical investigation. Following the assessment, implement a response plan.
Hydraulic Structure Operational Issues	Hydraulic structure with significant deterioration, deformation, distortion, bedding deficiencies, sedimentation, or blockage that have adversely affected operations	• Inspect the hydraulic structure for signs of deterioration, deformation, distortion, bedding deficiencies, sedimentation, or blockage • Utilize on-site equipment/materials/supplies to respond to the safety emergency event. o If surface water elevation increasing within the impoundment, and if facility operations allow, reduce or reroute storm water and/or process wastewater flows from discharging into the impoundment. o If surface water elevation increasing within the impoundment, utilize portable water pump(s) for managing surface water elevation. • Contact emergency response contractor(s) to assist with emergency response actions. • Contact engineer to conduct assessment. Following the assessment, implement a response plan.
Seismic Activity	Measurable seismic activity felt or reported within the surrounding community of the topographic region and resulted in visible damage	• Inspect for signs of embankment stability. • Utilize on-site equipment/materials/supplies to respond to the safety emergency event. • Contact emergency response contractor(s) to assist with emergency response actions. • Contact engineer to conduct assessment. Following the assessment, implement a response plan.
Sabotage	Sabotage or other criminal action with significant damage to an embankment or structures and the integrity is compromised	• Contact law enforcement authorities and restrict access in area to essential emergency response personnel only. • Inspect for signs of embankment stability. • Demarcate the area, document the location, and take photographs. • Utilize on-site equipment/materials/supplies to respond to the safety emergency event. o If necessary, lower water elevation within the impoundment. • Contact emergency response contractor(s) to assist with emergency response actions. • Contact engineer to conduct assessment. Following the assessment, implement a response plan.

Table 1-4. Example Response Action Options – Potential Failure (Cont.)

Event	Description	Example Response Action Options
Embankment Deformation	**Cracks:** Longitudinal or transverse cracking along embankment that increase with time and produces observable seepage Concave cracks on or near an embankment crest associated with slope movement	• Inspect for signs of depressions, seepage, sinkholes, cracking, or movement. • Demarcate the area, document the location, and take photographs. Record dimensions and relative location to existing surface features. • Utilize on-site equipment/materials/supplies to respond to the safety emergency event. o Place buttress fill against base of downstream slope below surface feature and extending beyond visible feature limits (parallel to embankment). o If necessary, place sandbags around crack area to divert storm water runoff from flowing into crack(s). o If necessary, stockpile fill material for later use. • Collect piezometer data, surface water level elevations, and seepage flow rate data. Monitor the embankment and record any change in conditions. • Contact emergency response contractor(s) to assist with emergency response actions. • Contact engineer to conduct assessment, which may include a geotechnical investigation. Following the assessment, implement a response plan.
	Slides/Erosion: Deep slides/erosion on an embankment that may extend beyond an embankment toe	• Inspect for signs of depressions, seepage, sinkholes, cracking, or movement. • Demarcate the area, document the location, and take photographs. Record dimensions and relative location to existing surface features. • Utilize on-site equipment/materials/supplies to respond to the safety emergency event. o Re-establish the embankment slope with fill material. Place buttress fill against base of downstream slope at the slide location that extends beyond the downstream limits (perpendicular to embankment) and extending beyond visible feature limits at either end (parallel to embankment). o If necessary, place sandbags around slide area to divert any storm water runoff from flowing into slide(s). o If necessary, stockpile additional fill for later use. • Collect piezometer data and surface water level elevations. Monitor the embankment and record any change in conditions. Consider survey monitoring. • Contact emergency response contractor(s) to assist with emergency response actions. • Contact engineer to conduct assessment, which may include a geotechnical investigation. Following the assessment, implement a response plan.
	Sinkholes: Sinkholes, or small depressions, observed on an embankment or near the toe of an embankment	• Inspect for signs of depressions, seepage, sinkholes, cracking, or movement. • Demarcate the area, document the location, and take photographs. Record dimensions and relative location to existing surface features. • Utilize on-site equipment/materials/supplies to respond to the safety emergency event. o Slowly lower water elevation within the impoundment. o Backfill the depression with relatively clean earth fill (free of organic materials) generally even with surrounding grade and slightly mounded in the center to shed storm water away from the depression. o If necessary, stockpile additional fill for later use. • Collect piezometer data and surface water level elevations. Monitor the embankment and record any change in conditions. • Contact emergency response contractor(s) to assist with emergency response actions. • Contact engineer to conduct assessment, which may include a geotechnical investigation. Following the assessment, implement a response plan.

2. SUPPLEMENTAL INFORMATION

This EAP has been prepared in accordance with the requirements of §257.73(a)(3) of the United States Environmental Protection Agency (USEPA) published Final Rule for Hazardous and Solid Waste Management System – Disposal of Coal Combustion Residual from Electric Utilities (40 CFR Parts 257 and 261, also known as the CCR Rule) published on April 17, 2015 (effective October 19, 2015) and subsequent amendments.

Additionally, this EAP generally follows the Federal Emergency Management Agency (FEMA) Federal Guidelines for Dam Safety, Emergency Action Planning for Dams[1] guidance document referenced within the Preamble of the CCR Rule (80 FR 21378).

2.1 Applicability

2.1.1 CCR Rule Applicability

The CCR Rule requires an owner or operator of a CCR surface impoundment that is assigned a significant or high hazard potential, per the periodic hazard potential classification assessment (§257.73(a)(2)), to prepare and maintain a written EAP (§257.73(a)(3)). Additionally, the EAP must be certified by a qualified PE.

[1] FEMA 64, Federal Guidelines for Dam Safety, Emergency Action Planning for Dams, July 2013

2.1.2 EAP Applicability

The Wisconsin Power and Light Company (WPL) Rock River Generating Station (ROR) in Beloit, Wisconsin has one legacy CCR surface impoundment. In accordance with the Hazard Potential Classification Assessment - (§257.73(a)(2)), the CCR surface impoundment has been classified as follows:

- ROR Final WPDES Settling Pond – Significant Hazard Potential

This EAP has been prepared for the CCR surface impoundment at ROR that is classified as having a significant hazard potential, as identified above.

2.2 Facility Information

ROR was located north of town on the western shore of the Rock River in Rock County at 827 W. B. R. Townline Road in Beloit, Wisconsin (Figure 1). ROR was bounded on the north by Townline Road, on the west by property owned by WPL known as Riverside Energy Center (REC), and on the south and east by the Rock River, which is a navigable body of water.

ROR was commissioned in 1954 as a coal-fired power plant. The facility consisted of two units. ROR ended coal combustion when the coal-fired boilers were converted to natural gas in 2000. The facility terminated generation of all electricity in 2012 and was demolished in 2017.

General Facility Information:

Date of Initial Facility Operations:		1954
Historical WPDES Wastewater Permit Number:		WI-0002402-05-0
Historical WPDES General Storm water Permit Number:		WI-S067857-3
Latitude / Longitude:	42°34’54.66”N	89°1’38.80”W
Unit Nameplate Ratings:	Unit 1 (1954) 75 MW - Coal	
	Unit 2 (1955) 75 MW - Coal	

Impoundment WDNR State ID None

2.2.1 ROR Final WPDES Settling Pond Location (§257.73(a)(3)(i)(D))

The Final WPDES Settling Pond is located south of the Closed Ash Landfill and storm water retention pond. The eastern and southern embankemnts of the Final WPDES Settling Pond are bordered by the Rock River, while the western boundary is bordered by a set of railroad tracks. Figure 1 shows the location of the Final WPDES Settling Pond. As of 2012, the estimated volume of CCR in the surface impoundment was 2,000 cubic yards as identified within the December 2012 Settling Basin Abandonment Plan and Landfill Closure Plan Modification. Closure construction has been initiated. The CCR has been removed from the Final WPDES Settling Pond as of October 2025.

The adjacent areas of the site comprise several components, including an Ash Disposal Facility (Landfill) Area, a former coal yard, a Storm Water Management Pond, an area surrounding the Final WPDES Settling Pond, and the ROR Final WPDES Settling Pond. Storm water from the former coal yard is conveyed through a 36-inch concrete pipe into the Storm Water Management Pond. Similarly, runoff from the Landfill Area is directed into the Storm Water Management Pond through open channel swales. The Storm Water Management Pond is constructed with an embankment height of 8 feet and serves as the primary collection point for site runoff. From there, storm water is discharged via a 24-inch concrete pipe located at elevation 745.8 feet into the Final WPDES Settling Pond. Additionally, surface runoff from the area surrounding the Final WPDES Settling Pond is also directed into the pond.

The Final WPDES Settling Pond is approximately 5.0 acres with embankments approximately 9 feet high relative to pond side and estimated at 20 feet high on the Rock River side based on

stream bed information from available Federal Emergency Management Agency (FEMA) Flood Zone Profiles for Rock County, Wisconsin. Storm water exfiltrates into underlying and adjacent soils under normal conditions. However, during high-intensity storm events, excess water could be discharged through an approximate 10-foot wide, 1-foot deep emergency spillway installed on top of the southern embankment during closure construction set at elevation 753 feet.

2.3 Response Action Preparedness

Preparedness for responding to a safety emergency event consists of activities and actions taken before the development of a safety emergency event. The following sub-sections summarize the various preparedness efforts conducted at the facility.

2.3.1 Surveillance and Monitoring (§257.73(a)(3)(i)(A))

Prompt detection and evaluation of a safety emergency event is critical to the effectiveness of this EAP, as well as to the timely emergency response. To detect a safety emergency event, the facility has developed and implemented an Alliant Energy I&M Plan which summarizes the applicable guidance for inspection, monitoring, and maintenance of each CCR surface impoundment. The Alliant Energy I&M Plan follows the CCR Rule, as well as the guidance documents that the USEPA references within the Preamble of the CCR Rule.

The Alliant Energy I&M Plan is a tool utilized by the facility to prevent uncontrolled release of CCR and/or CCR wastewater into the surrounding environment. The Alliant Energy I&M Plan identifies the factors which may affect the long-term stability of each CCR surface impoundment and recommends activities to maintain the integrity of each CCR surface impoundment. The Alliant Energy I&M Plan addresses the key roles of I&M personnel, identifies operation and maintenance activities currently implemented at the facility, describes the conditions of each CCR surface

impoundment, and provides guidance on the implementation of inspection, monitoring, maintenance, recordkeeping, and training requirements in accordance with the CCR Rule.

The following sub-sections identify the various detection methods implemented at the facility to assist with the identification of a safety emergency event.

- 7-Day Inspections: Each CCR surface impoundment at the facility must be examined by a qualified person in accordance with §257.83(a) of the CCR Rule. At intervals not exceeding seven days, each CCR surface impoundment is required to be visually inspected for any appearance of structural weakness or other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR surface impoundment. Additionally, discharge of all outlets of hydraulic structures which pass underneath the base of the CCR surface impoundment or through the embankment of the CCR surface impoundment are required to be visually inspected for abnormal discoloration, flow, or discharge of debris or sediment.
- Instrumentation Monitoring: Instrumentation supporting the operation of each CCR surface impoundment must be monitored by a qualified person in accordance with §257.83(a) of the CCR Rule. At intervals not exceeding thirty days, the instrumentation for the CCR surface impoundment is required to be monitored for proper functionality and detecting discernible or significant changes in the operation of the CCR surface impoundment.
- Event-Related Inspections: Event-related inspections shall be implemented and performed by a qualified person when significant events occur that could potentially affect the structural stability of each CCR surface impoundment. Examples of these events are as follows:
    - Following a storm event whose twenty-four-hour rainfall event meets or exceeds the 25-year storm event frequency in the surrounding area of the facility;
    - Following a strong wind-related event that may result in the overtopping of trees in the surrounding area of the facility;
    - Following a seismic event that warrants concern within the surrounding community of the topographic region;
    - When the water level within the CCR surface impoundment is higher than its normal operating levels and there is the possibility of embankment overtopping; and

- Following major maintenance activities that involve removal of tree stumps and roots from an embankment or the repair of animal burrows where embankment soils (not the vegetative layer) were disturbed.

- Annual Inspections: A qualified PE must conduct Annual inspections if the CCR surface impoundment has a height of five feet or more and a storage volume of twenty acre-feet or more; or the CCR surface impoundment has a height of twenty feet or more (§257.73(b), §257.73(d), and §257.83(b)).
  The purpose of the annual inspection is to ensure that the design, construction, operation, and maintenance of the CCR surface impoundment is consistent with recognized and generally accepted good engineering standards. The annual inspection of the CCR surface impoundment includes a review of available information regarding the status and condition of the CCR surface impoundment. The information reviewed includes all relevant files available in the operating record at the time of the annual inspection, as well as all relevant publicly accessible internet site entries.
  The annual inspection also includes a visual inspection of each CCR surface impoundment to identify signs of distress or malfunction of the CCR surface impoundment and appurtenant structures. Additionally, the visual inspection includes hydraulic structures underlying the base of the CCR surface impoundment or passing through the dikes of each CCR surface impoundment for structural integrity and continued safe and reliable operation.

2.3.2 Inundation Map (§257.73(a)(3)(i)(D))

This EAP identifies areas potentially impacted as a result of a failure of a CCR surface impoundment that has been classified as having a significant or high hazard potential. These areas are delineated in an inundation map (Figure 2), which identifies the probable maximum downstream limits that are likely to be impacted by the failure of the CCR surface impoundment. The inundation map shall be used to assist the facility and local emergency responders in the event of a safety emergency event with a potential or imminent failure.

2.3.3 Facility Access and Response Timing

Timely implementation of this EAP, as well as coordination and communication with local emergency responders, are crucial elements in the effectiveness of the emergency response actions.

In the event of a safety emergency event, the primary method of access to the facility is by automobile (e.g., car, truck, etc.). The primary route of travel by automobile is taking W.B.R. Townline Road and entering the Riverside Energy Center facility and following an access road on the east side of the facility south along the Rock River to the location of the ROR Final WPDES Settling Pond.

The expected response time for local emergency responders to mobilize to the facility once notified of a safety emergency event, using the primary method of access to the facility, is as follows:

- Beloit Fire Department (1111 Church St, Beloit, WI 53511) – Travel time to facility approximately 10 minutes
- Beloit Police Department (100 State St, Beloit, WI 53511) – Travel time to facility approximately 13 minutes
- Rock County Sheriff's Office (200 US-14, Janesville, WI 53545) – Travel time to facility approximately 18 minutes

In the event the primary method of access is not available, access is available through marine vessel along the Rock River a quarter mile south of the Riverside Energy Center.

The response time for emergency response contractors to mobilize to the facility, once notified of a safety emergency event, will vary based on the type of safety emergency event as that determines the necessary equipment and materials required to be mobilized to the facility.

2.3.4 Response during Periods of Darkness

In the event of a safety emergency event during periods of darkness, the facility manager, or designee, shall utilize available equipment (e.g., portable light towers) to properly illuminate the area where the safety emergency event is detected, as well as other crucial areas located at the facility used for assisting with emergency response actions. Additional assistance shall be provided by either the local emergency responders or emergency response contractors, as necessary, to effectively illuminate the various areas of the facility.

2.3.5 Response during Weekends and Holidays

Personnel are typically not present at the ROR Final WPDES Settling Pond and the former ROR facility has been demolished, although there is personnel available 24-hours at the Riverside Energy Center. The notification chart in Attachment D shall be used during all times, including weekends and holidays. Additional assistance may be provided by either the local emergency responders or emergency response contractors, as necessary.

2.3.6 Response during Adverse Weather

In the event of a safety emergency event during adverse weather conditions, the facility manager, or designee, shall utilize on-site equipment, materials, and supplies (e.g., snowplow, salt, sandbags, etc.) to provide clear and safe access for implementing the emergency response actions. Additional assistance shall be provided by either the local emergency responders or emergency response contractors, as necessary.

2.3.7 Emergency Equipment, Materials, and Supplies

ROR has no on-site equipment, materials, or supplies that are available to initiate response actions during a safety emergency event although the Riverside Energy Center has spill control

and heavy equipment available. Other equipment, materials, and supplies needed for response may be provided by either the local emergency responders or emergency response contractors, as necessary.

2.3.8 Security

There are no personnel staffed on site, although the Riverside Energy Center has personnel available 24-hours.

2.4 Reviews and Amendments

The following sub-sections summarize the reviews and amendments that are required per the CCR Rule.

2.4.1 Reviews

The EAP shall be reviewed at a minimum of every five years for appropriateness, accuracy, and adequacy to remain current. The EAP shall be promptly updated to address changes in personnel, contact information and/or significant changes to the facility or emergency response actions. A review and revision log is provided in Appendix A for documenting all revisions to the EAP. Even if no revisions are necessary, the annual review of the EAP shall be documented in Appendix A.

2.4.2 Amendments (§257.73(a)(3)(ii))

At a minimum, the EAP must be evaluated every five years as required per §257.73(a)(3)(ii) of the CCR Rule to ensure the information required per §257.73(a)(3)(i) of the CCR Rule is accurate.

Additional amendments to the EAP must occur as necessary whenever there is a change in conditions which substantially affect the EAP. These changes in conditions include, but are not limited to, changes in personnel, changes in emergency responder contact information, changes

in a CCR surface impoundment hazard potential classification designation, or the vertical expansion of a CCR surface impoundment.

Amendments to the EAP must be certified by a qualified PE per §257.73(a)(3)(iv). Once amended, the EAP must be placed in the facility's operating record as required by §257.105(f)(6) of the CCR Rule. Amendments to the EAP shall be documented in the review and revision log in Appendix A.

2.5 EAP Training and Exercise

EAP training and exercises are critical components in evaluating the effectiveness of an EAP. The following sub-sections summaries the training and exercise programs implemented at the facility.

2.5.1 Training

Facility personnel shall receive training to ensure they are thoroughly familiar with all elements of this EAP, which will allow for the effective implementation of this EAP to minimize loss of life, environmental damage, and property damage in the event of a safety emergency event of a CCR surface impoundment. Training may be held in conjunction with other emergency response training at the facility.

On an annual basis, facility personnel shall be trained in their roles and responsibilities under this EAP, which include, but is not limited to, the following:

- Facility manager roles and responsibilities;
- Detection and evaluation of a safety emergency event;
- Response action preparedness;
- Implementation of notification procedures;
- Implementation of emergency response actions based on the safety emergency event level;
- Evacuation and assembly procedures; and

- Post-emergency response action assessments.

In addition to annual training, an annual meeting between the facility manager and the local emergency responders shall be conducted (257.73(a)(3)(i)(E)).

A meeting and training log is provided in Appendix B to document the occurrence of the annual training and annual meetings.

2.5.2 Exercises

At the discretion of the facility manager, training exercises may be implemented at the facility to enhance prevention, preparedness, and response actions. Training exercises demonstrate the EAP's effectiveness in an actual situation and demonstrates the readiness levels of key personnel. Periodic exercises result in an improved EAP as lessons learned are incorporated into EAP review and amendments. If deemed necessary, local emergency responders may also be included in training exercise activities.

Types of exercises may include discussion-based exercises, as well as operations-based exercises. Discussion-based exercises familiarize participants with current plans, policies, agreements, and procedures, or may be used to develop new plans, policies, agreements, and procedures. Operations-based exercises validate plans, policies, agreements and procedures; clarify roles and responsibilities; and identify resource gaps in an operational environment.

Appendix C provides additional information on the types of discussion-based exercises and operations-based exercises, as well as provides recommended frequencies for each type of exercise.

2.6 Changes In Hazard Potential Classification (§257.73(a)(3)(iii))

2.6.1 Declassification

If the owner or operator of a CCR surface impoundment determines during a periodic hazard potential assessment that the CCR surface impoundment is no longer classified as either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment, then the owner or operator of the CCR surface impoundment is no longer subject to the requirement to prepare and maintain a written EAP beginning on the date the periodic hazard potential assessment documentation is placed in the facility's operating record as required by §257.105(f)(5) of the CCR Rule.

2.6.2 Reclassification

If a CCR surface impoundment is classified as a low hazard potential CCR surface impoundment, and the owner or operator subsequently determines that the CCR surface impoundment is properly reclassified as either a high hazard potential CCR surface impoundment or a significant hazard potential CCR surface impoundment, then the owner or operator of the CCR surface impoundment must prepare a written EAP for the CCR surface impoundment as required by §257.73(a)(3) of the CCR Rule within six months of completing such periodic hazard potential assessment.

3. CERTIFICATION (§257.73(a)(3)(iv))

To meet the requirements of 40 CFR 257.73(a)(3), I Mark W. Loerop hereby certify that I am a licensed professional engineer in the State of Wisconsin; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in 40 CFR 257.73(a)(3).

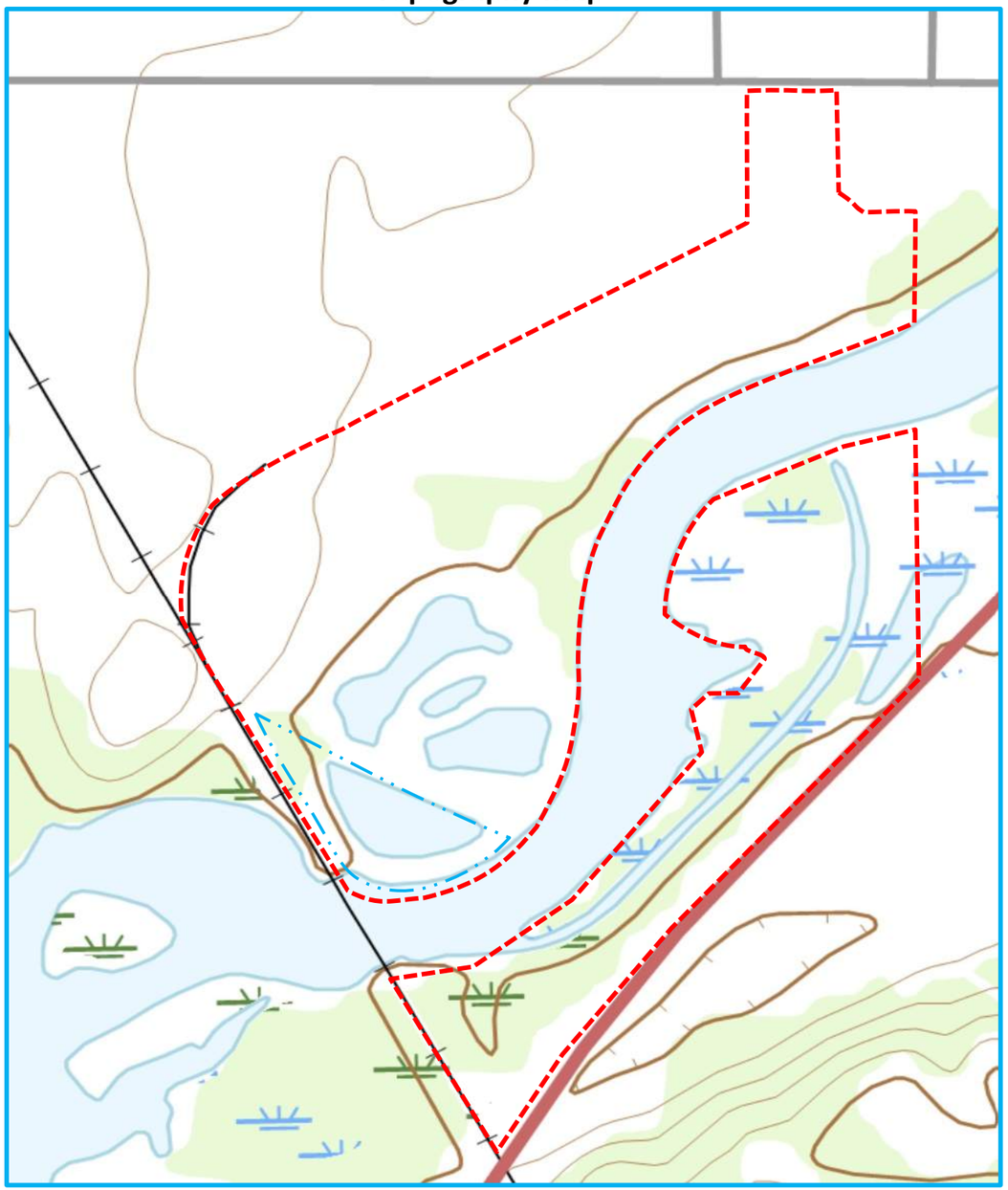
By: _____

Name: MARK LOEROP

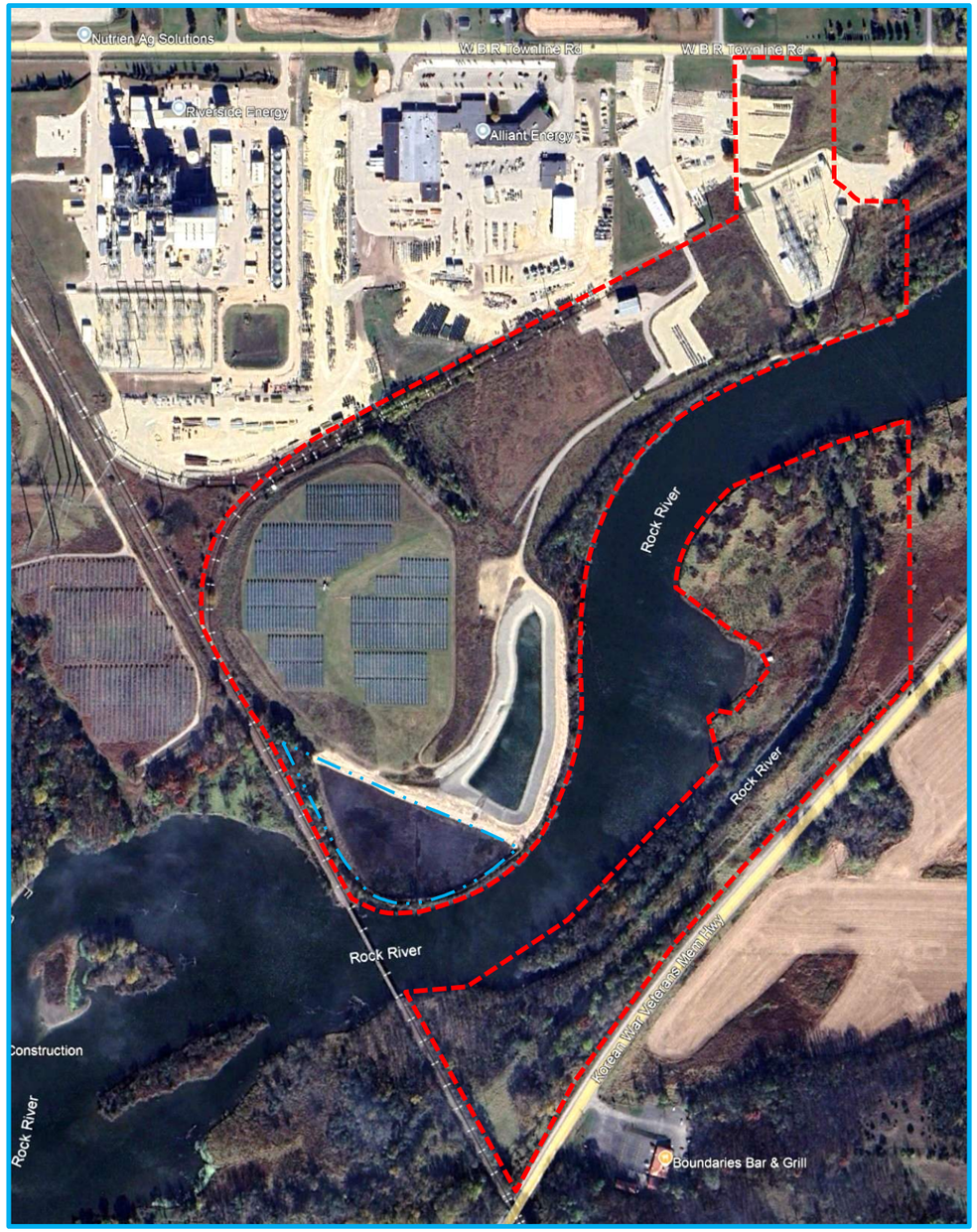
Date: MAY 6, 2026

Figures

Topography Map



Aerial Photo



Approximate Property Boundary

Final WPDES Settling Pond

hard hat SERVICES

Site Location
Rock River Generating Station
Wisconsin Power and Light Company

Drawing
Figure 1

Date
4/28/2026

ROR WPDES Final Settling Pond

Notes:

1. Per requirements of the CCR Rule (257.73(A)(3)) an inundation map delineates the downstream areas which would be affected in the even of a failure of a CCR surface impoundment. The inundation map identifies critical infrastructure and population-at-risk sites that may required protective measures, warning, and evacuation planning.

2. This inundation map does not delineate nor identify downstream areas which would have potential environmental impacts in the event of a failure of a CCR surface impoundment.

3. A failure of the ROR WPDES Final Settling Pond embankments is identified by the inundation area. The inundation area does not indicate a failure of all CCR surface impoundment embankments simultaneously.

4. As of October 2025, CCR has been removed from the ROR WPDES Final Settling Pond. There are no critical infrastructures identified within the inundation area. There are no population-at-risk sites located within the inundation area at ROR.

Inundation Area

hard hat™ SERVICES

Inundation Map
Rock River Generating Station
Wisconsin Power and Light Company

Drawing
Figure 2

Date
4/28/2026

ROR WPDES Final Settling Pond

Evacuation Route

hard hat SERVICES	Evacuation Map Rock River Generating Station Wisconsin Power and Light Company	Drawing Figure 3 Date 4/28/2026

solutions and action

Appendix A

Review and Amendment Log

APPENDIX A

Review and Amendment Log

Date of Review/Amendment	Completed By	Comments

This log sheet documents all reviews and amendments made to the EAP.

Note: Amendments must be certified by a qualified PE in accordance with 40 CFR 257.73(a)(3)(iv)

Appendix B

Meeting and Training Log

APPENDIX B

Meeting and Training Log

Date:_____ **Meeting Location:**_____

ATTENDEES		
NAME	TITLE	COMPANY/ORGANIZATION

Appendix C

EAP Training Exercises

APPENDIX C

Training Exercises

The following information provides the various types of training exercises that may be implemented at the facility, as identified in the Federal Guidelines for Emergency Action Planning for Dams[1].

Discussion-Based Exercises:

Discussion-based exercises familiarize participants with current plans, policies, agreements, and procedures, or may be used to develop new plans, policies, agreements, and procedures. The following are types of discussion-based exercises:

- Seminar: A seminar is an informal discussion designed to orient participants to new or updated plans, policies, or procedures (e.g., a seminar to review a new evacuation procedure). Seminars should include internal discussions with facility emergency management personnel as well as coordination with local emergency responders and other parties with a role in the Emergency Action Plan (EAP) implementation.
- Workshop: A workshop resembles a seminar but is used to build specific products such as a draft plan or policy. For example, a training and exercise plan workshop is used to develop a multi-year training and exercise plan.
- Tabletop Exercise: A tabletop exercise involves facility emergency management personnel discussing simulated scenarios in an informal setting. Tabletop exercises can be used to assess plans, policies, and procedures.
- Games: A game is a simulation of operations that often involves two or more teams, usually in a competitive environment, using rules, data, and procedures designed to depict an actual or assumed real-life situation.

[1] FEMA 64, Federal Guidelines for Dam Safety, Emergency Action Planning for Dams, July 2013

Operations-Based Exercises:

Operations-based exercises validate plans, policies, agreements and procedures; clarify roles and responsibilities; and identify resource gaps in an operational environment. The following are types of operational-based exercises:

- Drill: A drill is a coordinated, supervised activity usually employed to test a single operation or function, such as testing sirens and warning systems, checking available emergency resources (i.e. equipment, materials, and supplies), and conducting a call-down drill of those listed on the Emergency Notification Procedure Flowchart.
- Functional Exercise: A functional exercise examines and/or validates the coordination, command, and control between the various parties responsible for responding to a safety emergency event, such as facility emergency management personnel, AE Corporate Environmental, and local emergency responders. A functional exercise does not involve any "boots on the ground" such as first responders or emergency officials responding to an incident in real time.
- Full-Scale Exercises: A full-scale exercise involves the various parties responsible for responding to a safety emergency event, such as facility emergency management personnel, AE Corporate Environmental, and local emergency responders. The exercise involves functional response (i.e. boots on the ground) to a simulated event, such as activation of the EAP and role-playing to simulate an actual safety emergency event.

Functional and full-scale exercises are considered comprehensive exercises that provide the necessary verification, training, and practice to improve the EAP and the operational readiness and coordination efforts of all parties responsible for responding to safety emergency events at the facility. The basic difference between these two exercise types is that a full-scale exercise involves actual field movement and mobilization; in a functional exercise, field activity is simulated. The primary objectives of a comprehensive exercise (functional and full-scale) are listed below:

- Reveal the strengths and weaknesses of the EAP, including specified internal actions, external notification procedures, and adequacy of other information, such as inundation maps.
- Reveal deficiencies in resources and information available to the facility emergency management personnel and other parties responsible for responding to a safety emergency event.
- Improve coordination efforts between the facility emergency management personnel and other parties responsible for responding to a safety emergency event. Close coordination and cooperation among all responsible parties is vital for a successful response to an actual emergency.
- Clarify the roles and responsibilities of the facility emergency management personnel, local emergency responders, and all other parties involved in responding to a safety emergency event.
- Improve individual performance of the personnel who respond to the safety emergency event.
- Gain public recognition of the EAP.

Frequency of Exercises

The seminar, drill, tabletop exercise, and functional exercise should receive the most emphasis in an EAP exercise program. The following are recommended frequencies for these exercise types. The facility manager, in consultation with AE Corporate Environmental and local emergency responders, should determine actual frequencies appropriate for their facility.

- Seminars with local emergency responders – annually
- Drills to test the emergency notification procedures, emergency response actions, and emergency equipment / supplies / materials – annually
- Tabletop exercise – every 3 to 4 years or before functional exercises
- Functional exercise – every 5 years

A full-scale exercise should be considered when there is a need to evaluate actual field movement and deployment. When a full-scale exercise is conducted, safety is a major concern because of the extensive field activity. If the facility has the capability to conduct a full-scale exercise, a commitment should be made to schedule and conduct the entire series of exercises listed above before conducting the full-scale exercise. At least one functional exercise should be conducted before conducting a full-scale exercise. Functional and full-scale exercises also should be coordinated with other scheduled exercises, whenever possible, to share emergency management resources and reduce costs.

Appendix D

Emergency Notification Chart

EAP Personnel Contact Information

WPL – Rock River Generating Station
Beloit, Wisconsin

I&M Title	Name	Phone Numbers		Email
		Primary	Mobile	
Alliant Energy Environmental Specialist	Jeff Maxted	(608) 458-3853	(608) 213-8711	JeffreyMaxted@alliantenergy.com
	Matt Bizjack	(608) 458-3197	(847) 481-9127	MatthewBizjack@alliantenergy.com
Facility Environmental Specialist (ES)	James Zumstein	(608) 361-5116	(608) 436-6127	JamesZumstein@alliantenergy.com
Facility I&M Inspector(s)	James Zumstein	(608) 361-5116	(608) 436-6127	JamesZumstein@alliantenergy.com
Facility Management Team	Abdul Abdi	(608) 458-7345	(608) 239-1627	AbdulrahimAbdi@alliantenergy.com
	John Adams	(608) 361-5260	(608) 322-5273	JohnAdams@alliantenergy.com
	James Zumstein	(608) 361-5116	(608) 436-6127	JamesZumstein@alliantenergy.com

Updated: March 2026