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Interstate Power and Light Company
Sixth Street Generating Station
CCR Surface Impoundment Annual Inspection Report
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Executive Summary

This annual inspection report for the legacy Coal Combustion Residual (CCR) surface impoundment Closure Area ("Closed Ash Pond") at the former Sixth Street Generating Station (SSS) has been prepared in accordance with the requirements of the United States Environmental Protection Agency published Final Rule for Hazardous and Solid Waste Management System – Disposal of CCR from Electric Utilities (40 CFR Parts 257 and 261, also known as CCR Rule).

On May 8, 2024, the EPA issued the Final Legacy Coal Combustion Residual (CCR) Surface Impoundment Rule ("Legacy Surface Impoundment Rule") that established regulations for CCR surface impoundments at inactive facilities (40 C.F.R. § 257.100). The Legacy Surface Impoundment Rule requires that legacy surface impoundments that no longer receive CCR but contain both CCR and liquid on or after October 19, 2015 and that are located at an inactive electric utility, generally comply with the EPA requirements for inactive CCR surface impoundments in accordance with Title 40 of the Code of Federal Regulations, Part 257 Subpart D Hazardous and Solid Waste Management System; Disposal of CCR from Electric Utilities.

This annual inspection report assesses the condition of the Legacy CCR surface impoundments. Primarily, the annual inspection report focuses on the structural stability of the CCR surface impoundments and to ensure that the operation and maintenance of the CCR surface impoundments is in accordance with recognized and generally accepted good engineering standards.

After conducting the annual inspection, as well as review of available information pertaining to the status and condition of the legacy CCR surface impoundment, and having discussions with facility personnel who oversee and perform the operation, maintenance, and inspection activities of the Legacy CCR surface impoundment, there are no operating deficiencies and there have

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been no changes that have affected the stability or operations of the Legacy CCR surface impoundment since the previous annual inspection.

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1. INTRODUCTION

This annual inspection report has been prepared in accordance with the requirements of §257.83(b) of the United States Environmental Protection Agency (USEPA) published Final Rule for Hazardous and Solid Waste Management System – Disposal of Coal Combustion Residual (CCR), herein referenced as the CCR Rule, including Extension of Compliance Deadlines for Certain Inactive Surface Impoundments, and Legacy CCR Surface Impoundment Rule.

1.1 CCR Rule Requirements

The CCR Rule requires annual inspections by a qualified professional engineer (PE) for CCR surface impoundments with a height of 5 feet or more and a storage volume of 20 acre-feet or more or for CCR surface impoundments with a height of 20 feet or more (40 CFR §§ 257.73(b), 257.73(d), and 257.83(b)).

1.2 Annual Inspection Applicability

The Interstate Power and Light Company (IPL), former Sixth Street Generating Station (SSS) in Cedar Rapids, Iowa has one legacy CCR surface impoundment that meets the requirements of Section 1.1, identified as the SSS Closed Ash Pond.

The former SSS ended coal combustion and retired in 2008 and was demolished in 2015. Interstate 380 is located directly over the central portion of the SSS Closed Ash Pond, which includes several abutments throughout the impoundment. The Closed Ash Pond was historically referred to as Ash Pond 1, Ash Pond 2, Ash Pond 3, and Ash Pond 4. These ash ponds were operated collectively, contiguous to one another, and were closed in place under one continuous cover system. Because of this, the ash ponds are being considered a single legacy CCR surface impoundment. An engineered soil final cover system was installed in 2017 and 2018 according to the October 2018 Construction Documentation Report for the Settling Pond Closure at the Former SSS.

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The CCR surface impoundment has been assigned a state identification number by the Iowa Department of Natural Resources (IDNR), which is 57-SDP-34-04C.

The annual inspection of the CCR surface impoundment at SSS was completed by a qualified PE on May 22, 2026. The inspection was completed to ensure that the design, construction, operation, and maintenance of the CCR surface impoundment at SSS is consistent with recognized and generally accepted good engineering standards.

The annual inspection of the CCR surface impoundment at SSS included a review of available information regarding the status and condition of the CCR surface impoundment. The information reviewed included all relevant files available in the operating record at the time of the annual inspection, as well as the Alliant Energy CCR Rule Compliance Data and Information website entries for SSS (ccr.alliantenergy.com). These files for the CCR surface impoundments at SSS include, but are not limited to, CCR surface impoundment design and construction information (history of construction), hazard potential classification, structural stability assessment, safety factor assessment, hydrologic and hydraulic capacities (inflow flood control plan), results of 7-day inspections and instrumentation monitoring by a qualified person, and results of the previous annual inspection.

The annual inspection included a visual inspection of the CCR surface impoundment to identify signs of distress or malfunction of the CCR surface impoundments and appurtenant structures. Additionally, the visual inspection included hydraulic structures underlying the base of the CCR surface impoundment or passing through the dikes of the CCR surface impoundment for structural integrity and continued safe and reliable operation.

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2. ANNUAL INSPECTION REPORTING CRITERIA

The following sub-sections address the annual inspection reporting criteria per §257.83(b)(2) of the CCR Rule for the legacy CCR surface impoundment located at SSS.

2.1 SSS Closed Ash Pond

2.1.1 Changes in Geometry (§257.83(b)(2)(i))

After conducting the annual inspection, as well as review of available information provided by SSS pertaining to the status and condition of the legacy CCR surface impoundment, and discussions with SSS facility personnel who oversee and perform the operation, maintenance, and inspection activities of the legacy CCR surface impoundment, there have been no changes in the geometry since the previous annual inspection.

2.1.2 Existing Instrumentation (§257.83(b)(2)(ii))

Historical instrumentation that supported the operation of the SSS Closed Ash Pond included flow monitoring equipment and discharge piping. As part of the closure activities all associated discharge structures were demolished and removed. The impoundment currently includes a small stormwater pond with a geosynthetic clay liner (GCL) atop the engineered soil cap that receives storm water from Interstate 380, which is elevated above the Closure Area. This water largely evaporates, although during significant precipitation events, stormwater can discharge southwest through an overflow pipe. This piping was inspected, and no deficiencies were observed.

2.1.3 Depth and Elevation of Impounded CCR and Water (§257.83(b)(2)(iii))

The approximate minimum, maximum, and present depths, and elevations of the impounded CCR and water in the SSS Closed Ash Pond since the previous annual inspection were determined using information that was collected during the annual inspection, as well as from historical information that was previously provided from IPL.

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- At the time of the annual inspection, stormwater was present within the GCL lined pond atop the engineered soil final cover system. The as-built information may be reviewed in the October 2018 Construction Documentation Report for the Settling Pond Closure at the Former SSS.
- Water levels are no longer recorded because the CCR materials have been covered with an engineered soil cap, the impoundment no longer manages CCR wastewaters, and construction closure activities are complete. As a result, the minimum, maximum, and present depths of water are no longer collected.
- The original base of CCR materials was approximately 720 feet in elevation and after closure the subgrade maximum elevation is 733 giving a maximum thickness of approximately 13 feet.

2.1.4 Storage Capacity of Impounding Structure (§257.83(b)(2)(iv))

The storage capacity (i.e., water volume) of the CCR surface impoundment at the time of the annual inspection was not estimated because the CCR construction closure activities have been completed. SSS no longer manages CCR wastewaters and only stormwater runoff is periodically present within the lined storm water pond over the impoundment.

2.1.5 Volume of Impounded CCR and Water (§257.83(b)(2)(v))

The volume of impounded CCR (i.e., total volume, not including freeboard) within the SSS Closed Ash Pond at the time of the annual inspection was estimated based on the February 28, 2013, Coal Ash Impoundment Site Assessment Final Report. The volume of CCR within the closed impoundment is approximately 40,000 cubic yards.

The volume of water was not measured because the closure activities have been completed, SSS Closed Ash Pond no longer manages CCR wastewaters and only stormwater runoff is contained within a GCL-lined pond within the footprint of the impoundment.

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2.1.6 Structural Weaknesses and Disruptive Conditions (§257.83(b)(2)(vi))

After review of available information provided by SSS pertaining to the status and condition of the legacy CCR surface impoundment, discussions with facility personnel who oversee and maintain the operation, maintenance, and inspection activities of the legacy CCR surface impoundment, as well as conducting the on-site visual inspection of the legacy CCR surface impoundment, there have been no identified structural weaknesses of the legacy CCR surface impoundment. There is potential to lead to structural weakness if the areas of tall vegetation and trees are not properly managed. The areas of tall vegetation and trees are located on the downstream slopes of the embankment in several areas of the impoundment.

There were no disruptive conditions identified along the upstream and downstream slopes of the embankments. Overgrown vegetation that exists in several areas of the downstream slopes has the potential to disrupt the operation and safety of the Legacy CCR surface impoundment if the vegetation is left unmanaged. These areas are not on IPL property.

2.1.7 Other Changes Affecting Stability or Operation of Impounding Structure (§257.83(b)(2)(vii))

After review of available information provided by SSS pertaining to the status and condition of the legacy CCR surface impoundment, as well as discussions with SSS facility personnel who oversee and maintain the operation, maintenance, and inspection activities of the legacy CCR surface impoundment, there have been no identified changes that have affected the stability or operation of the SSS Closed Ash Pond since the previous annual inspection.

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3. CERTIFICATION

To meet the requirements of 40 CFR 257.83(b), I, Mark W. Loerop, hereby certify that I am a licensed professional engineer in the State of Iowa; 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 257.83(b).

By: _____

Name: Mark Loerop

Date: June 5, 2026

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