



Post-Closure Plan for Inactive CCR Surface Impoundments

Prepared for Interstate Power and Light Company
Sutherland Generating Station
Marshalltown, IA

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Certification and Seal:

I hereby certify that this engineering document was prepared by me or under my direct personal supervision and that I am a duly licensed Professional Engineer under the laws of the State of Iowa:



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My license renewal date is December 31, 2018

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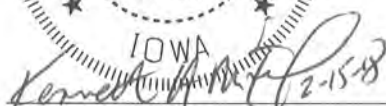

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TABLE OF CONTENTS

1. INTRODUCTION & PURPOSE	1
2. DESCRIPTION OF MONITORING / MAINTENANCE ACTIVITIES	2
2.1 Mowing.....	3
2.2 Visual Inspections by the Owner / Operator	3
2.3 Visual Inspection and Report by Certified Professional Engineer	3
2.4 Groundwater Monitoring.....	3
3. CONTACT INFORMATION FOR POST-CLOSURE CARE	3
4. PROPERTY USE DURING POST-CLOSURE CARE PERIOD.....	4
5. CERTIFICATIONS	4
6. REFERENCES	4

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1. INTRODUCTION & PURPOSE

Interstate Light and Power Company (IPL) – a wholly owned subsidiary of Alliant Energy – operates the Sutherland Generating Station (SGS), located east of Marshalltown, IA, in Marshall County. SGS has four inactive coal combustion residual (CCR) surface impoundments, collectively known as the Main Ash Settling Area.

To comply with the requirements of the USEPA Final CCR Rule (40 CFR 257.50 thru 257.107), 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 for inquiries about the closed CCR facility during the post-closure care period, and
- Description of the planned uses of the property during post-closure period.

SGS currently operates four inactive CCR surface impoundments, under the provisions of the CCR Rule. This Post-Closure Plan applies to the following inactive CCR surface impoundments:

- Primary (North) Pond
- Primary (South) Pond
- Secondary (Main) Pond
- Polishing Pond

Adjacent to these CCR ponds, there is also the Discharge Pond. This pond was not designed to hold, treat, or dispose of CCR and therefore is not subject to the CCR Rule. Additionally, a hydrated fly ash pile is located on site that has not received CCR on or after October 19, 2015 and is not subject to the post-closure requirements of the CCR Rule.

Figure 1 provides an annotated aerial photograph of the SGS which identifies the Main Ash Settling Area and other significant site facilities.



Figure 1 – Current Layout of Sutherland Generating Station (Prior to Closure)

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. The frequency of these activities is as mandated by the CCR Rule unless noted otherwise.

Monitoring and Maintenance Activities	Frequency
Mow Vegetation	Semi-annually (minimum)
Visual Inspection by Owner / Operator	Monthly (minimum)
Visual Inspection and Report by Licensed 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 during the growing season. Mowing will be performed on a semi-annual basis unless more frequent mowing is required to facilitate inspections during periods of higher vegetation growth.

2.2 Visual Inspections by the Owner / Operator

At a minimum, the Owner/Operator of the closed CCR unit shall visually inspect the closed impoundment 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. Furthermore, 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 the Owner/Operator indicate potential concerns, a detailed inspection of the closed CCR surface impoundment will be performed by a licensed professional engineer. The professional engineer will visually inspect the surface and side slopes of the closed impoundment to identify any problem areas such as erosion, subsidence, settlement or other events.

2.4 Groundwater Monitoring

The Owner/Operator will maintain the groundwater monitoring system and monitor groundwater quality in accordance with the requirements of §257.90 through §257.98 of the CCR Rule. Groundwater monitoring will be performed on a semi-annual basis in accordance with §257.94(b) of the CCR Rule.

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.

Alliant Energy
Attn: Sutherland Generating Station Site Manager
4902 N. Biltmore Lane
Madison, WI 53718
(800) 255-4268
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 facility at Sutherland, as of the issue date of this Plan, is to remain a natural, undisturbed vegetated area. There is also a potential for solar photovoltaic development on the site.

5. CERTIFICATIONS

It is S&L's opinion that this written Post-Closure Plan meets the requirements of §257.104(d)(4).

6. REFERENCES

- 40 CFR Part 257, Subpart D – Environmental Protection Agency Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities