

February 6, 2024
File No. 25221243.00

Mr. George Kueny
Interstate Power and Light Company
2115 E. Nevada St.
Marshalltown, IA 50158

Subject: Groundwater Monitoring System Update - Certification
Former Sutherland Generating Station, Marshalltown, Iowa

Dear Mr. Kueny:

The groundwater monitoring system at the former Sutherland Generating Station (SGS) has been updated in 2023 with one additional downgradient monitoring well (MW-312). This letter certifies, pursuant to 40 CFR 257.91(f), that the monitoring system is designed and constructed to meet the requirements of 40 CFR 257.91. The monitoring network is sufficient to accurately represent the quality of background groundwater that has not been affected by leakage from the coal combustion residuals (CCR) unit, and the quality of groundwater passing the waste boundary of the CCR unit.

Based on the design information provided for our review, the number, spacing, and depths of the monitoring system, components were determined using site-specific information in accordance with 40 CFR 257.91(b).

The groundwater monitoring system now consists of two upgradient and five downgradient monitoring wells, which exceeds the minimum requirements of 40 CFR 257.91(c)(1).

All of the CCR units at SGS were closed in June 2020. The groundwater monitoring network at SGS is a multi-unit system that monitors the closure area, which includes the following closed CCR surface impoundments:

- SGS North Primary Pond
- SGS South Primary Pond
- SGS Main Pond
- SGS Polishing Pond

The multi-unit system is designed to detect monitored constituents at the waste boundary of the closed CCR surface impoundments as required by 40 CFR 257.91(d).

An Assessment of Corrective Measures was initiated on January 23, 2022, and was completed on June 22, 2022. The process of selecting a remedy for the groundwater impacts identified at SGS per 40 CFR 257.97 is in progress.

Based on the installation documentation for placement in the site operating record to meet the requirements of 40 CFR 257.105(h)(2) and provided for our review, the monitoring wells have been cased in a manner that will maintain the integrity of the monitoring well borehole and were constructed in accordance with the requirements of 40 CFR 257.91(e).

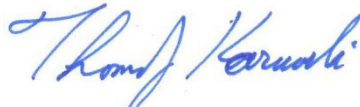


PE Certification

	<p>I, Eric J. Nelson, hereby certify that the groundwater monitoring system at the Sutherland Generating Station has been designed and constructed to meet the requirements of 40 CFR 257.91. This certification is based on my review of documentation in the operating record regarding the design, installation, and development of the groundwater monitoring system components. I am a duly licensed Professional Engineer under the laws of the State of Iowa.</p>
	<p> 02/06/2024</p>
	<p>(signature) (date)</p>
	<p>Eric J. Nelson (printed or typed name)</p>
	<p>License number <u>23136</u></p> <p>My license renewal date is December 31, 2024.</p> <p>Pages or sheets covered by this seal: Groundwater Monitoring System Update – Certification, all pages.</p>

Sincerely,


 Eric J. Nelson, PE
 Project Director
 SCS Engineers


 Thomas J. Karwoski
 Senior Project Manager
 SCS Engineers

MDB/AJR_lmh/EJN

cc: Chris Braye, Interstate Power and Light Company
 Jeff Maxted, Alliant Energy

I:\25221243.00\Deliverables\Network Update MW-312\PE Certification Letter\240206_Kueny_SGS_PE_Certification_Letter.docx