

US EPA ARCHIVE DOCUMENT



Interstate Power and Light Co.
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August 23, 2011

Via E-mail to: Hoffman.Stephen@epamail.epa.gov

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Mr. Stephen Hoffman
U.S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

**Re: Interstate Power and Light Company – Burlington Generating Station
Response to July 26, 2011 EPA letter and Final Coal Combustion
Waste Impoundment Round 7-Dam Assessment Report**

Dear Mr. Hoffman:

On July 26, 2011, Interstate Power and Light Company's Burlington Generating Station ("IPL") received the United States Environmental Protection Agency's ("EPA") "Final Coal Combustion Waste Impoundment Round 7-Dam Assessment Report" ("Report") and corresponding cover letter. The cover letter provided recommendations that the EPA believes are necessary to ensure the stability of the coal combustion residual impoundments. In addition, the letter requested that IPL respond by August 23, 2011 with specific plans and schedules for implementing the recommendations.

IPL has carefully reviewed the findings and recommendations contained in the Report. Attachment 1 provides IPL's response regarding the applicability and implementation of the recommendations pursuant to your request. If you have any questions, feel free to contact me at (319) 758-5301.

Sincerely,

A handwritten signature in black ink, appearing to read "RHuschak", written over a white background.

Robert Huschak
Plant Manager

Enclosure

Cc: Bill Skalitzky
Jenna Wischmeyer

Attachment 1

Burlington Generating Station Final Coal Combustion Waste Impoundment Round 7-Dam Assessment Report Recommendations

1.2.6. Recommendations Regarding the Maintenance and Methods of Operation

EPA's Observation and Recommendation:

Although the maintenance program appears to be adequate, the following recommendations should improve maintenance and ensure trouble-free operation:

- Develop a written operation and maintenance plan
- Remove trees from the downstream slopes of the Ash Seal Pond and Bottom Ash Pond dikes, pending approval from the Army Corps of Engineers and the Iowa Department of Natural Resources.

IPL's Response:

IPL, along with our independent consulting engineer, Aether DBS, will prepare a site-specific operations and maintenance plan ("O&M Plan") based on the following criteria:

- Corps of Engineers EM 111 0.2.301, *Guidelines for Landscape Planting and Vegetation Management at Floodwalls, Levees, and Embankment Dams*;
- FEMA 534, *Technical Manual for Dam Owners: Impacts of Plants on Earthen Dams*;
- FEMA 473, *Technical Manual for Dam Owners: Impacts of Animals on Earthen Dams*; and
- U.S. Department of Labor, Second Edition, May 2009: *Engineering and Design Manual for Coal Refuse Disposal Facilities, Chapter 12: Monitoring, Inspections, & Facility Maintenance*

The O&M Plan is likely to include semi-annual inspections by plant staff and an annual inspection by a professional engineer from Aether DBS. The Plan will be developed and implemented, including training for selected power plant personnel, no later than May 1, 2012.

As part of the development of the O&M Plan, IPL and Aether DBS will evaluate the necessity to remove the larger trees based on the slope stability reports and the impact the removal may have on the overall integrity of the dikes. This evaluation is expected to be completed by December 31, 2011. All small trees and brush will be maintained in accordance with the O&M Plan. Prior to any tree removal, an endangered species review will need to be conducted. In addition, any necessary approvals or permits will need to be obtained from the Iowa Department of Natural Resources and Army Corp of Engineers. IPL anticipates removing those trees identified in the O&M Plan by June 1, 2012, pending receipt of all required regulatory approvals and after the annual spring floods have subsided.

1.2.7 Recommendations Regarding Continued Safe and Reliable Operation

EPA's Observation and Recommendation:

Continue to minimize stockpiling of ash on the Economizer Ash Pond northern embankment.

IPL's Response:

As noted in IPL's July 20, 2011 letter to Belinda Holmes of the EPA, IPL is moving forward with reconfiguring the economizer ash pond. As part of this work, the active settling portion of the economizer pond will be moved away from the northern embankment. This will eliminate the storage of dredged ash from this embankment.