

US EPA ARCHIVE DOCUMENT

Comments:

EPA:

Page ii: Should say: "*Beginning* in February 2009..." "*These letters were issued...*"

State: None

Company: See attached letter dated March 1, 2011



March 1, 2011

**Via E-mail to: [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov)  
and [kohler.james@epa.gov](mailto:kohler.james@epa.gov)**

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

**Re: Response to Draft Assessment Reports  
Burlington Generating Station**

Dear Mr. Hoffman:

This letter is sent on behalf of Interstate Power and Light Company's ("IPL") Burlington Generating Station. IPL received the Draft Coal Combustion Waste Impoundment, Round 7 – Dam Assessment Report for Burlington Generating Station (Site 017) dated November, 2010 ("Draft Report"). The site assessment was conducted by the United States Environmental Protection Agency's ("EPA") contractor Dewberry & Davis, LLC on October 7, 2010. EPA's cover email accompanying the Draft Report requests that comments be submitted to USEPA by March 7, 2011, and provides for a business confidentiality claim covering all or part of the information.

**CONFIDENTIAL BUSINESS INFORMATION CLAIM**

IPL is claiming business confidentiality for both the Draft and Final Reports associated with the site assessment of the coal combustion material management units at the Burlington Generating Station and for the comments submitted in this letter in their entirety, a claim which is being made in accordance with 40 C.F.R. Part 2, Subpart B.

Per the criteria established by 40 CFR. Part 2, Subpart B, §2.208, the documents for which confidential treatment is requested are entitled to confidential treatment because: (1) this claim is timely and has not been waived, (2) IPL has taken reasonable measures to protect the confidentiality of the information and intends to continue to take such measures, (3) the information is not reasonably obtainable without IPL's consent by other persons by use of legitimate means, (4) no statute

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An Alliant Energy Company

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specifically requires disclosure of this information, and (5) the disclosure of the information is likely to cause substantial harm to IPL's competitive position.

All of the documents for which confidential treatment is requested help IPL maintain its competitive position. IPL protects the confidentiality of this information by making it available only to those within the company with a legitimate need to know the information for purposes of performing their jobs.

## COMMENTS ON THE DRAFT ASSESSMENT

Listed below are the comments associated with the Draft Report for the IPL – Burlington Generating Station.

*Italics*' indicate language in Draft Report. **Bold** indicates suggested language.

### General Comment:

1. Remove "*Alliant Energy*" and insert "**Interstate Power and Light Company**" IPL". This should "*Alliant Energy*" references in the footer of each page.
2. Remove "*Fly Ash*" for the description of our ash ponds and describe them as "**Ash Ponds**". The only pond that actively receives a fly ash type of Coal Combustion Residue is the Economizer Ash Pond. All other ponds; Ash Seal Pond, Main Ash Pond, Upper and Lower Ash Pond; mainly receive bottom ash. References for "*fly ash*" can be found on Page ii (3 references in second paragraph); Page ii (1 reference in third paragraph); Page 2-1 (1 reference in first paragraph); and Page 2-3 (2 references in third paragraph)

### Cover Page:

1. Cover Page – Remove "*Alliant Energy*" and insert "**Interstate Power and Light Company**" or "**IPL**".
2. Cover Page - Remove "*Fly Ash*" and insert "**Ash**" in front of the Impoundment Dikes.

### Section 1.1.1; 1.1.2; 1.1.3; 1.1.4; and 1.1.8:

1. Page 1-1 and 1-3, Pond Ratings – All four ash ponds were rated as "*Poor*" due to lack of documentation. Please change these ratings to "**Satisfactory**" based on our comments and the attached Ash Pond Slope Stability and Hydraulic Analysis prepared by Aether dbs on behalf of the Burlington Generating Station.

### Section 1.2.1; 1.2.2; and 1.2.3:

1. Page 1-3 and 1-4, Pond Ratings – Please find the attached Ash Pond Slope Stability and Hydraulic Analysis prepared by Aether dbs on behalf of the Burlington Generating Station. The information contained in the report should satisfy these recommendations listed in the above referenced sections.

Section 1.2.6:

1. Page 1-4, second bullet – Please remove the following sentence: “*Clear tall vegetation from the Crest of the Bottom Ash Dikes*”. The crests of the impoundments were mowed shortly after the on-site assessment visit and will be addressed in the site Operations and Maintenance Plan, as recommended in the first bullet of this section.
2. Page 1-4, third bullet – Please insert the following language: “*Remove trees from downstream slopes of the Ash Seal Pond and Bottom Ash Pond Dikes*” “**pending approval from the Army Corp of Engineers and Iowa Department of Natural Resources**”. Since the Burlington Generating Station is located in the Critical Habitat Area for the Endangered Indiana Bat, no trees are allowed to be removed pending completion of a Habitat Survey and approval from Iowa DNR. In addition, approval maybe required to remove trees located in the floodplain or areas that may impede navigation.

Section 1.3.1:

1. Page 1-5, List of Participants – Remove “*Alliant Energy*” and insert “**Interstate Power and Light Company**” for Buddy Hasten and Robin Nelson. Remove “*Hansen*” and insert “**Hasten**” for the correct spelling of Buddy’s last name.

Section 2.1:

1. Page 2-1, Figure 2.1-1 Site Plan – Remove “*proposed location of coal pile runoff pond*” and insert “**Coal Pile Runoff Pond**” since the pond was installed; is operational; and is NPDES Outfall 007.
2. Page 2-2, third paragraph – The ash seal pond no longer discharges through Outfall 006 and into the condenser discharge canal prior to reaching the Mississippi River. This discharge structure is permanently sealed and the ash seal water is pumped to the Main Ash Pond. Construction of this activity took place in 2009, after receiving approval from the Iowa DNR. Subsequently, the Iowa DNR amended the existing NPDES Permit on January 20, 2010. Any storm water in the pond will be pumped to the Main Ash Pond as well. The calculations used in the Ash Pond Slope Stability and Hydraulic Analysis Report prepared by Aether dbs on behalf of the Burlington Generating Station contain this information. In addition, please find the following attachments: NPDES Permit dated January 20, 2010 and the BGS Ash Seal Pond Reroute drawings. Please accept our apologies if this information was not provided during your site visit.

Section 2.3:

1. Page 2-4, first paragraph – Please reword the first paragraph to the following: “**Materials stored in the Ash Seal Pond MAY include fly ash; bottom ash, and economizer ash from past sluicing activities. Due to the 2009 rerouting of the ash seal water, the ash seal pond only receives storm water runoff from the**

**plant site and the hydrated fly ash storage pile (Product Name C-Stone)".** Boiler wash waters or other process waters are not sent to the Ash Seal Pond.

2. Page 2-4, second paragraph – Please reword the second paragraph to the following:  
**"Materials stored in the Bottom Ash Pond MAY include fly ash; bottom ash; and economizer ash from past sluicing activities. Wastewaters sent to the pond for further treatment include bottom ash sluice waters; non-chemical boiler wash waters; ash seal water; floor drains from the plant ONLY during an emergency; and storm water contributions from plant site runoff and the storage pile associated with the hydrated fly ash (Product Name C-Stone). Due to the 2009 rerouting of the ash seal water, ash seal waters are processed through this pond".**
3. Page 2-4, third paragraph – Please reword the third paragraph to the following:  
**"Materials stored in the Economizer Ash Pond MAY include fly ash; bottom ash, and economizer ash from past sluicing activities. Wastewaters sent to the pond for further treatment include economizer ash sluice waters; boiler blowdown; non-chemical air heater washes; oil water separator discharge resulting in the treatment of plant floor drains; plant storm water runoff; and wastewaters associated with the treatment of Mississippi River water for steam grade waters. In addition, this pond receives coal pile runoff and Solids Contact Unit sludge created during the first phase of treatment of the Mississippi River water in the steam grade water production.**
4. Page 2-4, fourth paragraph – Please reword the fourth paragraph to the following:  
**"Materials stored in the Ash Ponds 1 and 2 MAY include fly ash; bottom ash, and economizer ash from past sluicing activities. Wastewaters sent to the pond for further treatment include effluent from the Main Ash Pond; Economizer Ash Pond; and coal pile runoff pond.**

Section 2.4.2:

1. Page 2-6, first paragraph, Ash Seal Pond – Please see comment in Section 2.1 above. This pond no longer discharges into the Condenser Discharge Channel but was rerouted in 2009 to the bottom ash pond. The outlet structure is still present, but is sealed and is no longer incorporated into the site NPDES permit. Either rephrase this paragraph to account that the structure is still but present and permanently sealed or remove this paragraph

Section 2.5:

1. Page 2-7, first paragraph, Western Railroad – Please remove "*the main ash pond*" as a pond that could affect the railroad tracks. In our opinion, only Ash Pond #1 and Ash Pond #2 are the only ponds that could/may have an impact on the railroad tracks based on the proximity of the ponds to the railroad track. The Main Ash pond does not

share a border with the railroad or railroad ditch and any failure of the Main Ash Pond western berm would be captured in Ash Pond #1.

Section 3.0:

1. Page 3-1, first paragraph, Summary of Reports – Please note that all items identified in the March 4, 2009 Inspection Report have been completed. After each one of the bullet items, please insert the following:
  - *“Build up of settled ash near dike walls or discharge structure in the Economizer Ash Pond”* **“RESOLVED: The site has removed the ash in front of the discharge structure (See Figure 5.4.4-2) and along the western berm of the pond,”**
  - *“Visual seeps through the dike wall, erosion of dike on outside slope, and ponding of water outside the dike wall of Ash Pond 1”* – **“RESOLVED: As provided in the Attached Documents section of the report, a letter dated January 4, 2010 from Klinger and Associates documents the work completed on the Ash Pond #1 berm”.**
  - *“Repair damage to Ash Pond 3 caused by animal activity”* – **“RESOLVED: As noted in the January 10, 2010 letter from Klinger and Associates, the entire Ash Pond 1 berm was completed”.** Also, during this assessment and during our internal 2010 assessment, no animal activity was noted in the report or inspection sheets.
  - *“Dredge the Economizer Pond to restore capacity”* – **“RESOLVED: During the assessment, dredged economizer ash was being loaded into trucks for disposal into a landfill”.**
  - *“Remove trees from dikes”* – **“RESOLVED: All trees were removed from the dike walls that were deemed to be a problem, especially on the Ash Pond 1 dike”.**

Section 3.1:

1. Page 3-1, first paragraph, NPDES Permit – Please insert the following language **“The permit was issued on September 5, 2006; was amended number one was issued on April 10, 2009; amendment number two was issued on January 8, 2010; and the permit expires on September 4, 2011. The facility submitted a NPDES Permit Renewal application on February 18, 2011, which is greater than the 180 days from permit expiration”.** Please remove the following *“The permit was issued on September 5, 2006 and expires on September 4, 2011”.*
2. Page 3-1 and 3-2, NPDES Permit Outfalls - see comment in Section 2.1 and Section 2.4.2 above. Please remove the fourth bullet *“006 – Ash Seal Pond”.* This outfall is no longer in the existing NPDES permit.
3. Page 3-2, last paragraph – Please remove the following sentence *“The Ash Seal Pond discharges to a drainage canal along the south dike. The canal flows directly into the Mississippi River”* and insert **“The Ash Seal Pond no longer discharges to**

**the condenser discharge canal that is located on the south dike. The condenser discharge canal discharges directly into the Mississippi River”.**

4. Page 3-2, last paragraph – Add an “r” at the end of “*economize*”. The correct name of the pond is the economizer ash pond.

Section 4.1.2 and 4.1.3:

1. Page 4-1, second paragraph – The ash seal pond has been changed since the original design. This pond no longer discharges through Outfall 006. The ash seal water is collected in a pump seal well and is discharged into the Main Ash Pond. Storm water collected in the ash seal pond can be pumped to the Main Ash Pond using a portable pump. Information in these two sections regarding the ash seal pond must be included. Please see the attached BGS Ash Seal Pond Reroute drawings. Also, in 2010 the facility dredged a large amount of economizer ash from the economizer ash pond. The dredging changed the flow pattern within the pond to allow for more retention time and increased the size of the equipment area to properly dredge; dewater; and haul the ash offsite.
2. Page 4-2, last paragraph – Please remove this entire paragraph since we are not planning any work on the Ash Pond 2 impoundment berm.

Section 4.2.1:

1. Page 4-2, first paragraph, Ash Seal Pond – Remove “*Decant water from the Ash Seal Pond discharges to a drainage canal abutting the south dike. The drainage canal discharges directly into the Mississippi River*” to “**Prior to the 2009 operational change, decant water from the ash seal discharged into the condenser discharge canal that is next to the south dike of the ash seal pond. This condenser discharge canal discharges into the Mississippi River**”.

Section 4.2.2 and 4.2.3:

1. Page 4-3, first paragraph of both sections, Significant Changes and Current Operational Changes – Language must be inserted regarding the change in status of the ash seal pond. The ash seal pond has been changed since the original design. This pond no longer discharges through Outfall 006. The ash seal water is collected in a pump seal well and is discharged into the Main Ash Pond. Storm water collected in the ash seal pond can be pumped to the Main Ash Pond using a portable pump. Information in these two sections regarding the ash seal pond must be included. Please see the attached BGS Ash Seal Pond Reroute drawings.

Section 5.2.3:

1. Page 5-5, first paragraph, Downstream Slope of Ash Seal Pond – In the first sentence of this paragraph, remove “*discharge canal*” and insert “**condenser discharge canal**”.
2. Page 5-6, First Paragraph – Remove references to “*Eco-Stone*” and insert “**C-Stone**”.



3. Page 5-6, Figure 5.2.3-3 – Remove reference to “Eco-Stone” and insert “**C-Stone**”.
4. Page 5-8, second paragraph – After the Dewberry visit, the crest of the bottom ash pond was mowed. No issues were observed in the dike after the mowing.

Section 5.3.2:

1. Page 5-10, second paragraph, second sentence – Remove “dry” and insert “**hydrated**”. Remove reference to “Eco-Stone” and insert “**C-Stone**”.
2. Page 5-10, Figure 5.3.2-2 – Remove reference to “Eco-Stone” and insert “**C-Stone**”.

Section 5.3.3:

1. Page 5-13, first paragraph – Remove “*Flooding of the Ash Seal Pond discharge canal*” to “**Flooding of the Mississippi River into the condenser discharge canal...**”.

Section 5.4.1:

2. Page 5-15, Figure 5.4.4-1 – The caption for this picture states “*Economizer Ash Pond Crest and Upstream Slope*”. The crest (gravel roadway) is actually part of the coal pile runoff pond. The pond in the foreground is Ash Pond 1.

Section 5.7.1:

1. Page 5-22, first paragraph – The ash seal pond no longer overflows into the condenser discharge canal. The overflow structure is still present, but is permanently closed. Since this outfall is removed from the amended NPDES permit, a discharge from this overflow structure cannot take place.

Section 5.7.2:

1. Page 5-25, first paragraph – The ash seal pond no longer overflows into the condenser discharge canal. The overflow structure is still present, but is permanently closed. Since this outfall is removed from the amended NPDES permit, a discharge from this overflow structure cannot take place. Please delete this entire paragraph and insert the following: “**The original outlet structure of the ash seal pond discharged into the condenser discharge canal. The ash seal pond outlet is permanently sealed and the outfall has been removed from the sites NPDES permit. At the time of Dewberry’s site visit, the Mississippi River was flooding into the condenser discharge canal. As a result Dewberry was unable to observe the Ash Seal Pond outlet**”.

Section 6.1:

1. Page 6-1, Hydrologic/Hydraulic Safety, Supporting Technical Documents - Please review the attached Slope Stability/Hydraulic Analysis dated February 11, 2011 that was prepared by Aether dbs on behalf of the Burlington Generating Station. This report will address the information found in Sections 6.1.1; 6.1.2; 6.1.3; and 6.1.4.

Section 6.2:

1. Page 6-1, Hydrologic/Hydraulic Safety, Supporting Technical Documents - Please review the attached Slope Stability/Hydraulic Analysis dated February 11, 2011 that was prepared by Aether dbs on behalf of the Burlington Generating Station. This report will provide the necessary information for Dewberry to properly assess the hydrologic/hydraulic safety of our ash ponds.

Section 6.3:

1. Page 6-1, Assessment of Hydrologic/Hydraulic Safety - Please review the attached Slope Stability/Hydraulic Analysis dated February 11, 2011 that was prepared by Aether dbs on behalf of the Burlington Generating Station. Based on the information contained in the report, the current rating of *POOR* should be changed to **"Satisfactory"**.

Section 7.1:

1. Pages 7-1, 7-2, and 7-3, Structural Stability, Supporting Technical Documents - Please review the attached Slope Stability/Hydraulic Analysis dated February 11, 2011 that was prepared by Aether dbs on behalf of the Burlington Generating Station. This report will address the information found in Sections 7.1.1; 7.1.2; 7.1.3; 7.1.4.; 7.1.5; and 7.1.6..

Section 7.2:

1. Page 7-3, Hydrologic/Hydraulic Safety, Supporting Technical Documents - Please review the attached Slope Stability/Hydraulic Analysis dated February 11, 2011 that was prepared by Aether dbs on behalf of the Burlington Generating Station. This report will provide the necessary information for Dewberry to properly assess the hydrologic/hydraulic safety of our ash ponds.

Section 7.3:

1. Page 7-3, Assessment of Structural Stability - Please review the attached Slope Stability/Hydraulic Analysis dated February 11, 2011 that was prepared by Aether dbs on behalf of the Burlington Generating Station. Based on the information contained in the report, the current rating of *POOR* should be changed to **"Satisfactory"**.

Section 8.1:

1. Page 8-1, Operating Procedure of Ash Seal Pond - Please remove this entire paragraph and insert the following: **"Materials stored in the Ash Seal Pond MAY include fly ash; bottom ash, and economizer ash from past sluicing activities. Due to the 2009 rerouting of the ash seal water, the ash seal pond only receives storm water runoff from the plant site and the hydrated fly ash storage pile (Product Name C-Stone). No new coal combustion wastes are added to this pond. A low dike around the spillway riser ensures no water is discharged**

**through this outfall. Figure 8.1-1 shows the location of the low interior dike and the sealed spill way”.**

2. Page 8-1, Operating Procedure of Bottom Ash Pond - Please remove the first section of the paragraph and insert the following: **“Materials stored in the Bottom Ash Pond MAY include fly ash; bottom ash; and economizer ash from past sluicing activities. Wastewaters sent to the pond for further treatment include bottom ash sluice waters; non-chemical air heater and boiler wash waters; ash seal water; and storm water contributions from plant site runoff and the storage pile associated with the hydrated fly ash (Product Name C-Stone). Due to the 2009 rerouting of the ash seal water, ash seal waters are processed through this pond”.** The second section of this paragraph starting with *“Water collected ...”* is still valid and applicable to the Bottom Ash Pond.
3. Page 8-2, Operating Procedure of Economizer Ash Pond - Please remove the first section of the paragraph and insert the following: **“Materials stored in the Economizer Ash Pond MAY include fly ash; bottom ash, and economizer ash from past sluicing activities. Wastewaters sent to the pond for further treatment include economizer ash sluice waters; boiler blowdown; non-chemical air heater basket wash water; oil water separator discharge resulting in the treatment of plant floor drains; plant storm water runoff; and wastewaters associated with the treatment of Mississippi River water for steam grade waters. In addition, this pond receives coal pile runoff and Solids Contact Unit sludge created during the first phase of treatment of the Mississippi River water in the steam grade water production”.** The second section of this paragraph starting with *“Water collected ...”* is still valid and applicable to the Economizer Ash Pond.
4. Page 8-3, Operating Procedure of Ash Pond 1 - Please remove the first section of the paragraph and insert the following: **“Materials stored in the Ash Pond 1 MAY include fly ash; bottom ash, and economizer ash from past sluicing activities. Wastewaters sent to the pond for further treatment include effluent from the Main Ash Pond; Economizer Ash Pond; and coal pile runoff pond”.** The second section of this paragraph starting with *“Ash Pond 1 decant water ...”* is still valid and applicable to Ash Pond 1.
5. Page 8-4, Operating Procedure of Ash Pond 2 - Please remove the first section of the paragraph and insert the following: **“Materials stored in the Ash Pond 2 MAY include fly ash; bottom ash, and economizer ash from past sluicing activities. Wastewaters sent to the pond for further treatment include effluent from the Main Ash Pond; Economizer Ash Pond; and coal pile runoff pond”.** The second section of this paragraph starting with *“Ash Pond 2 decant water ...”* is still valid and applicable to Ash Pond 2.

Mr. Stephen Hoffman  
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Section 8.3.2:

1. Page 8-5, Second Bullet – As noted in our comments in Section 3.0, the tall vegetation on the crest of the Bottom Ash dike was cut shortly after the assessment and will be incorporated into the written operations and maintenance plan.
2. Page 8-5, Third Bullet – Please insert the following language in the third bullet **“pending proper regulatory from the Army Corp of Engineers and the Iowa Department of Natural Resources”**.

Section 9.1:

1. Page 9.1, Second Bullet – Revise this paragraph to include the July 2010 Ash Pond Inspection, which is included in the attachments

Appendix A:

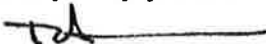
1. Site Location Map – Remove “*Alliant Energy*” and insert “**Interstate Power and Light Company”IPL”**”.

**REQUEST FOR CONFERENCE CALL WITH AMEC TO REVIEW COMMENTS**

Finally, because of the technical complexity and factual detail contained in the Draft Report, IPL believes it would be efficient and helpful to conduct a conference call between IPL and Dewberry & Davis, LLC to review the details of these comments prior to its preparation of a Final Report. IPL would be happy to coordinate the time and set up a call-in number. IPL specifically requests such a discussion.

IPL appreciates this opportunity to provide comments on the Draft Report for the Burlington Generating Station. If you have any technical questions, please contact William Skalitzky at (608) 458-3108. If you have any legal questions, please contact Dan Siegfried at (319) 786-4686.

Very truly yours,



Terry L. Kouba  
Director, Generation Operations

cc: James Kohler - EPA  
William Skalitzky - AECS  
Dan Siegfried - AECS  
Vernon Hasten - AECS