

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

July 26, 2011

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL

Mr. Daniel Siegfried, Managing Attorney  
Alliant Energy Corporate Services  
Legal Department  
200 First Street SE  
PO Box 351  
Cedar Rapids, IA 52406-0351

Dear Mr. Siegfried,

On October 7, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Burlington Generating Station facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the Burlington Generating Station facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the Burlington Generating Station facility is enclosed. This report includes a specific condition rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the Burlington Generating Station facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please provide a rationale. Please provide a response to this request by August 23, 2011. Please send your response to:

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

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If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman  
U.S. Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Drive  
5<sup>th</sup> Floor, N-5838  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov)

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as “confidential” you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

Please be advised that providing false, fictitious, or fraudulent statements of representation may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued efforts to ensure protection of human health and the environment.

Sincerely,  
/Suzanne Rudzinski/, Director  
Office of Resource Conservation and Recovery

Enclosures

**Burlington Generating Station Recommendations (from the final assessment report)**

**1.2.1 Recommendations Regarding the Structural Stability**

Observations made during the site visit do not indicate signs of overstress, significant settlement, shear failure, or other signs of instability. Technical documentation provided after submittal of the initial Draft report (See Section 10.0 and Appendix D of the final report) initially indicated slope stability issues, but subsequent soils analyses and engineering calculations concerning dike stability showed adequate structural stability exists for all dikes onsite.

**1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety**

Observations made during the site visits and discussions with the participants indicated that impoundment dikes, except for the Lower Ash Pond, have not been overtopped in previous storms that produced flooding in the Mississippi River. Hydrologic/hydraulic analyses provided after issuing the Draft report indicate that the Main Ash Pond and Upper Ash Pond can retain the 100-year, 24-hour storm events without overtopping. Therefore there are no recommendations concerning hydrologic/hydraulic safety.

**1.2.3 Recommendations Regarding the Supporting Technical Documentation**

The supporting technical documentation provided in response to recommendations in the initial draft report was sufficient.

**1.2.4 Recommendations Regarding the Description of the Management Unit(s)**

No recommendations appear warranted at this time.

**1.2.5 Recommendations Regarding the Field Observations**

No recommendations appear warranted at this time.

**1.2.6 Recommendations Regarding the Maintenance and Methods of Operation**

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.

**1.2.6 Recommendations Regarding the Surveillance and Monitoring Program**

No recommendations appear warranted at this time.

**1.2.7 Recommendations Regarding Continued Safe and Reliable Operation**

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