

US EPA ARCHIVE DOCUMENT



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

**JUL 05 2011**

### VIA ELECTRONIC MAIL AND REGULAR MAIL

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

RE: Burlington Generating Station  
Burlington, Iowa

Dear Mr. Siegfried:

Over the last few months, Alliant and the Environmental Protection Agency Region 7 have been discussing concerns about the stability of some of the coal ash ponds at your Burlington Generating Station in Burlington, Iowa. These discussions were prompted by investigations being performed nationwide by EPA staff in the Office of Solid Waste and Emergency Response at EPA Headquarters (OSWER). These investigations have been undertaken to determine whether the facilities with ponds similar to the ones at the Burlington Generating Station met acceptable factor of safety ratings based on the Corps of Engineers rating system for dams. As part of that ongoing investigation, OSWER staff and managers reviewed the preliminary findings contained in a February 3, 2011 report prepared by Alliant's contractor, Aether DBS (Aether), which raised some questions regarding whether some of the ponds at your facility met these safety factors. While our discussions were ongoing, Alliant hired Aether to perform a more in-depth study of all of the coal ash ponds at that facility. The report containing the results of that study was provided to the EPA on June 1, 2011. This more in-depth study concluded that all of the ponds at the Burlington Generating Station meet acceptable factors of safety for dams.

The EPA and its contractor, Dewberry & Davis, LLC (Dewberry), have reviewed Aether's June 1 report and agree with the findings. The EPA believes that the investigation was performed in accordance with all applicable engineering standards and best practices, and agrees with Aether's findings that, based on the data collected for the June 1 report, all of Alliant's coal ash ponds at the Burlington Generating Station meet acceptable factors of safety.



In some of our previous correspondence, Alliant had committed to undertaking some other measures which would improve the stability of some of the ponds even more. The EPA is asking that Alliant proceed with this commitment and undertake those measures as outlined in the EPA's letter of March 29, 2011 and Alliant's response of April 5, 2011, and to consider going ahead with a slope improvement project for the Economizer Pond as was informally discussed in your e-mail of June 3, 2011

The EPA very much appreciates Alliant's cooperation and prompt attention to this matter, as well as the quality of the work performed. Alliant's and Aether's openness, attention to collecting reliable data and presenting it in a professional, well-organized manner made these discussions go very smoothly.

If you have any further questions, please contact Belinda Holmes of the Office of Regional Counsel or Nicole Moran of my staff. Again, thank you for your cooperation in this matter.

Sincerely,



Becky Weber, Director  
Air and Waste Management Division  
U.S. EPA Region 7

cc: Stephen Hoffman, OSWER  
Pete Raack, OECA  
Jared Hautamaki, ORSE  
Wayne Gieselman, IDNR