

US EPA ARCHIVE DOCUMENT

Memorandum

To: Dan Siegfried (Alliant Energy Managing Attorney)
CC: Terry Kouba (Director Generation Operations)
William Skalitzky (Senior Environmental Specialist)

From: Plant Manager (Buddy Hasten)

Re: BGS Response to EPA Letter dated 3-29-2011 (Re: Response to Alliant Energy March 23, 2001 Letter: Significant Structural Stability Concerns at the Burlington Generating Station)

The memo provides a response to EPA's letter dated March 29, 2011 that was in answer to our letter addressing significant structural stability concerns at the Burlington Generating Station. EPA concurred with the actions that BGS proposed to address concerns with structural stability of the ash ponds on site; however, they included an additional seven action items in their response. This memo specifically addresses additional requested activities C, D, and E in the letter.

Item C: "Avoid stockpiling reclaimed Economizer Ash on the north side of the pond." The BGS Economizer Ash pond has changed since the Dewberry site visit. During the Dewberry visit, ash deposits were observed on top of the Economizer Ash pond as a result of a major rearrangement of the pond's settling basin and discharge path. The excavated ash was dewatered and taken to a landfill. BGS does not stock pile ash on top of the pond for long time storage. The attached picture shows the current configuration of the pond and clearly shows that no ash is stockpiled on either the north or south sides of the pond. The only ash that will be placed on top of the pond will be as a result of our periodic dredging, dewatering and hauling process. BGS will not perform dredging operations until late summer, by which time the results of additional soil borings and formal dam break analysis will be known.

Item D: "Relocate handling and loading operations for the reclaimed Economizer Ash to the south side of the pond." Our process for maintaining the Economizer Ash pond settling basin requires us to periodically dredge ash from the basin. Based on the physical arrangement of the ash pond, most of the dredging operations can be performed on the south and east sides of the pond but there will still be some need to dredge and place material on the north side of the pond to dewater prior to hauling away. The section of the pond on the north side that would be used is approximately 120' wide and the handling and loading operations are nearly 100' from the north edge of the levee. As stated above, BGS will not perform dredging operations until late summer by which time the results of additional soil borings and formal dam break analysis will be known.


Item E: Establish an equipment-free perimeter (minimum 10 feet) along the entire water's edge of the Economizer pond." BGS assumes that EPA is referring to the exterior water's edge. If EPA is referring to the exterior North side of the Economizer Ash pond only, then this request should be feasible once the discharge path is rerouted to the center of the pond. BGS will agree to not use heavy equipment (e.g. dozers, dump trucks, etc.) along the water's edge on the North side of the levee until the additional soil borings and analysis have been completed and the results communicated to EPA. However, equipment access inside a 10 foot zone along the water's edge is required for routine maintenance (e.g. grass cutting, minor landscaping, etc.).

The actions above are being taken at this time based on inconclusive soil boring data in which ash and not clay was reported as the subsurface foundation material for the north east corner of the levee.

CONFIDENTIAL BUSINESS INFORMATION

April 5, 2011

BGS will reevaluate the need for the cautionary actions of items C, D, and E above following a follow-up set of soil borings that are scheduled to be taken on the Economizer Ash pond levee.

A handwritten signature in black ink, appearing to read "V. M. H.", with a stylized flourish at the end.

Buddy Hasten
Plant Manager