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

March 13, 2013

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

VIA E-MAIL

Ms. Jenna Wischmeyer, Attorney
Alliant Energy Corporate Services Legal Department
200 First Street SE
PO Box 351
Cedar Rapids, IA 52406-0351

Re: Request for Action Plan regarding Alliant Energy - WI Power & Light Co - Edgewater Generating Station

Dear Ms. Wischmeyer,

On May 31, 2011 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the Alliant Energy - WI Power & Light Co - Edgewater 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 Alliant Energy - WI Power & Light Co - Edgewater 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 Alliant Energy - WI Power & Light Co - Edgewater Generating Station facility can be accessed at the secured link below. The secured link will expire in 60 days.

Here is the link: http://www.yousendit.com/download/UVJqV280QTZPSHlybHNUQw

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 Alliant Energy - WI Power & Light Co - Edgewater Generating Station facility. These recommendations are listed in Enclosure 1.

Since these recommendations relate to actions which could affect the structural stability of the CCR management unit(s) 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 **April 15, 2013**. Please send your response to:

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

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
5th Floor, N-5838
Arlington, VA 22202-2733

You may also provide a response by e-mail to hoffman.stephen@epa.gov, dufficy.craig@epa.gov, kelly.patrickm@epa.gov and englander.jana@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

Enclosure

Enclosure 1

Alliant Energy - WI Power & Light Co - Edgewater Generating Station

Recommendations (from the final assessment report)

CONCLUSIONS

In general, the Slag Pond was found to have the following deficiencies:

1. Trees and shrubs were present on the upstream and downstream slopes;
2. Potholes were present along the crest of the embankments;
3. Vertical cracking of one section of the cast-in-place concrete retaining wall; Small branches partially blocking inlet structure; and,
4. The stability of the embankments was not evaluated under seismic loading.

Additional analysis was completed and provided to GZA after issuance of the DRAFT report that satisfies our recommendation. No further analysis is recommended at this time.

In general, the North Pond A and South Pond A were found to have the following deficiencies:

1. Trees and shrubs were present on the upstream and downstream slopes;
2. Potholes were present along the crest of the embankments;
3. An erosion feature on the downstream slope of the eastern portion of the southern embankment of South Pond A; and,
4. The stability of the embankments was not evaluated under seismic loading.

Additional analysis was completed and provided to GZA after issuance of the DRAFT report that satisfies our recommendation. No further analysis is recommended at this time.

In general, the Pond B was found to have the following deficiencies:

1. Trees and shrubs were present on the upstream and downstream slopes;
2. Potholes were present along the crest of the embankments;
3. Wave action erosion was present along the upstream slope; and,
4. The stability of the embankments was not evaluated under seismic loading.

Additional analysis was completed and provided to GZA after issuance of the DRAFT report that satisfies our recommendation. No further analysis is recommended at this time.

In general, the Pond F was found to have the following deficiencies:

1. Trees and shrubs were present on the upstream and downstream slopes;
2. Potholes were present along the crest of the embankments;
3. The locations of the discharge pipes from Pond C to Pond F were not visible at the time of our assessment; and,
4. The stability of the embankments was not evaluated under seismic loading.

Additional analysis was completed and provided to GZA after issuance of the DRAFT report that satisfies our recommendation. No further analysis is recommended at this time.

RECOMMENDATIONS

The following sections describe the recommended approach to address current deficiencies.
Prior to undertaking recommended maintenance, repairs, or remedial measures, WP&L should secure applicable permits as necessary.

Studies and Analyses

GZA recommends the following studies and analyses:

1. Perform a stability analysis of the downstream slope of the Slag Pond to account for the section of the embankment being retained by the cast-in-place retaining wall.
2. Evaluate the stability of the impoundment embankments under seismic loading.

Additional analysis was completed and provided to GZA after issuance of the DRAFT report that satisfies our recommendations. No further analysis is recommended at this time.

Recurrent Operation & Maintenance Recommendations

GZA recommends the following operation and maintenance level activities:

1. Maintain grass cover on the upstream and downstream slope and approximately 15 feet beyond the toe area. USACE recommends vegetation be kept less than 12 inches in height on embankments;
2. Remove trees from the upstream and downstream slopes;
3. Fill potholes, depressions, and animal burrows and reseed as necessary; and,
4. Exercise stoplogs and slide gates.

Minor Repair Recommendations

GZA recommends the following minor repairs which may improve the overall condition of the impoundments, but do not alter their current design. The recommendations may require design by a professional engineer and construction contractor experienced in dam construction.

1. Repair the wave-action erosion along the upstream slope of the western embankment of Pond B.

Remedial Measures Recommendations

1. Determine location of pipes that discharge into Pond F. Generate plan for maintaining access for repair and evaluation.