

US EPA ARCHIVE DOCUMENT



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 - Nelson  
Dewey Generating Station

Dear Ms. Wischmeyer,

On June 7, 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 - Nelson Dewey 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 - Nelson Dewey 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 - Nelson Dewey 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 - Nelson Dewey 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  
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), [dufficy.craig@epa.gov](mailto:dufficy.craig@epa.gov), [kelly.patrickm@epa.gov](mailto:kelly.patrickm@epa.gov) and [englander.jana@epa.gov](mailto: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 - Nelson Dewey Generating Station  
Recommendations (from the final assessment report)**

**CONCLUSIONS**

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

1. Animal burrows along the crest;
2. Shrubs growing on the upstream slope;
3. Incomplete stability analysis;
4. Minor erosion on the downstream slope; and,
5. Wave action erosion of the upstream slope.

*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 WPDES Pond was found to have the following deficiencies:**

1. Infrequent mowing of the embankments allowing shrub growth; and,
2. Incomplete stability analysis.

*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, the applicability of permits needs to be determined for activities that may occur within the jurisdiction of the appropriate regulatory agencies.

**GZA recommends the following studies and analyses:**

1. Expand the stability analysis of the impoundment embankments to include water surface and seepage conditions that represent the 100 year, 24-hour storm event. The analysis should include justification of the soil parameters used through in-situ or laboratory testing and also account for the presence of the clay at the base of the embankment.

*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.*

**Recurrent Operation & Maintenance Recommendations**

**GZA recommends the following operation and maintenance level activities:**

1. Repair sloughing on the downstream slope of the Slag Pond;
2. Protect the northwestern embankment of the Slag Pond from wave action erosion;
3. Control burrowing animals on and near embankment; and,
4. Fill animal burrows.