

US EPA ARCHIVE DOCUMENT



Wisconsin Power and Light Co.
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April 15, 2013

Via E-mail to: hoffman.stephen@epa.gov

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

**Re: Wisconsin Power and Light Company – Rock River Generating Station
Response to March 13, 2013 EPA letter and Final Report Round 10 Dam
Assessment**

Dear Mr. Hoffman:

On March 13, 2013, Wisconsin Power and Light Company's Rock River Generating Station ("WPL") received the United States Environmental Protection Agency's ("EPA") "Final Report Round 10 Dam Assessment" ("Report") and corresponding cover letter. The cover letter provided recommendations that the EPA believes are necessary to ensure the stability of the coal combustion residual impoundments. In addition, the letter requested that WPL respond by April 15, 2013 with specific plans and schedules for implementing the recommendations.

WPL has carefully reviewed the findings and recommendations contained in the Report. WPL will implement the operations and maintenance and minor repair activities per your recommendations as included in Attachment 1. WPL will continue to perform inspections of the impoundments and water levels throughout the pond system. If conditions warrant, WPL will perform any remedial activities to ensure safe operations of the ash ponds at the site. Since the WPDES permit requires closure by October 31, 2014, WPL will initiate closure of the ponds during late 2013 and finalize the closure by October 31, 2014.

If you have any questions, feel free to contact me at (608) 458-3661.

Sincerely,

A handwritten signature in black ink, reading "James P. Brummond".

J. P. Brummond
Regional Director Generation

Enclosure

Attachment 1

Rock River Generating Station Final Report Round 10 Dam Assessment Recommendations

Recurrent Operations and Maintenance Activities:

GZA recommends the following operation and maintenance level activities:

1. *Clear inappropriate woody vegetation, including trees and brush and maintain grass cover on the crest, 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.*

As part of the pond closure activities, trees and brush will be removed as deemed necessary. Remaining coal combustion residue (CCR) in the WPDES ponds (closest to the Rock River) will be removed and placed in the onsite landfill. Most of the trees located on this embankment will remain to provide a natural wildlife habitat. WPL intends to start on the closure activities in late summer/early fall with a closure date of October 31, 2014.

2. *Fill potholes, depressions, and animal burrows and reseed as necessary.*

WPL will develop a procedure by May 1, 2013 to address potholes, depressions, and animal burrows by June 1, 2013. The procedure will follow the Alliant Energy Corporate Operations and Maintenance Plans that were developed for our other locations.

3. *Record and maintain monthly measurements of the pond water surface elevation and observation wells and establish response action protocols for various elevation levels for each impoundment as appropriate. It is recommended that the water elevation within any impoundment not be allowed to rise beyond the level that which was observed during our site evaluation (about elevation 750 feet). The frequency of monitoring should be adjusted based on results of the hydrologic and hydraulic analysis.*

WPL will hire a survey company to determine the 750 foot elevation for each pond by June 1, 2013. Water levels will be recorded on the monthly inspection sheet by June 1, 2013. A response action plan may be develop, based on concurrence with our geotechnical consultant, and implemented by July 1, 2013. This action plan and inspections will cease once the pond closure activities take place and the CCR has been removed from the ponds.

4. *Monitor decant outflow structures and clear silt or debris which may block or impede outflow.*

As part of the monthly inspections, WPL will remove any debris in the overflow structures by June 1, 2013 and will continue until these structures are removed as part of the pond closure.

5. *Take measures as necessary so as to maintain operability and function of the various impoundment water level control mechanisms. Set said control mechanisms so as to minimize the build-up of water within the impoundments.*

As discussed in numbers 3 and 4 above, WPL will monitor the pond levels and inspect the various decant structure by June 1, 2013. WPL will monitor the ponds levels and operate the control structures to reduce the levels in the ponds as much as practical.

6. *Exercise water control mechanisms to verify proper operating condition.*

As part of the monthly inspection, WPL will ensure all water control mechanisms are operating correctly by June 1, 2013.

Minor Repairs:

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. *Remove trees, stumps, and their associated root systems from the embankments*

As part of the pond closure activities, trees and brush will be removed as deemed necessary. Remaining coal combustion residue (CCR) in the WPDES ponds (closest to the Rock River) will be removed and placed in the onsite landfill. Most of the trees located on this embankment will remain to provide a natural wildlife habitat. WPL intends to start on the closure activities in late summer/early fall with a closure date of October 31, 2014.

2. *Repair deteriorated decant structures and other water level control mechanisms as appropriate.*

WPL will repair the structures and water level control mechanisms if our geotechnical consultant determines it is necessary since these structures will be removed as part of the closure.