

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 -Rock River Generating Station

Dear Ms. Wischmeyer,

On June 8, 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 -Rock River 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 -Rock River 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 -Rock River 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 -Rock River 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 -Rock River Generating Station
Recommendations (from the final assessment report)**

CONCLUSIONS

The impoundments were observed to have the following deficiencies:

1. No stability or hydraulic analysis of the impoundments.
2. Overgrown vegetation and trees up to 24-inches in diameter on the crests, downstream and upstream embankments.
3. Potholes along the crests of the embankments.
4. Deterioration of the inlet pipes associated with WPDES Pond 1 and WPDES Pond 2.

RECOMMENDATIONS

Studies and Analyses:

GZA recommends the following studies and analyses:

1. Perform a detailed hydrologic and hydraulic study using current methodology to evaluate each impoundment's ability to safely pass the standard design flood.
2. Develop an emergency action plan.
3. Perform a stability analysis of the impoundment embankments including static, seismic and liquefaction loading.

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.
2. Fill potholes, depressions, and animal burrows and reseed as necessary.
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.
4. Monitor decant outflow structures and clear silt or debris which may block or impede outflow.
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.
6. Exercise water control mechanisms to verify proper operating condition.

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

Remedial Measures:

1. In conjunction with the results of the updated hydrologic and hydraulic analyses, make provisions for an emergency overflow spillway(s) if appropriate.

It is our understanding that permanent closure of the impoundments in accordance with applicable State of Wisconsin Department of Natural Resource regulations is to be completed in 2014 based on conversations with WP&L personnel during the on-site assessment. It is GZA's opinion that the slopes appeared to be stable based on observed conditions at the time of assessment, and no imminent signs of distress were observed. WP&L should maintain and monitor the embankment structures until permanent closure status has been

obtained. In the interim, GZA is of the opinion it would be prudent for WP&L to at least implement the above recommended operations and maintenance and minor repair activities due to the anticipated two- to three-year time frame until permanent closure status is achieved. This includes at a minimum that all water level control mechanisms be arranged so as to limit maximum pool elevation to about elevation 750 feet. However, these recommendations should be evaluated for consistency with the conditions of the current and anticipated steps of the planned closure. If closure of the Site does not occur, it is GZA's opinion that all of the repair, maintenance, and analysis recommended in this report should be performed.