

US EPA ARCHIVE DOCUMENT



Interstate Power and Light Co.
An Alliant Energy Company

April 15, 2013

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

**Re: Interstate Power and Light Company – 6th Street Generating Station
Response to March 13, 2013 EPA letter and Final Report Round 10 Dam
Assessment**

Dear Mr. Hoffman:

On March 13, 2013, Interstate Power and Light Company's 6th Street Generating Station ("IPL") 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 IPL respond by April 15, 2013 with specific plans and schedules for implementing the recommendations.

IPL has carefully reviewed the findings and recommendations contained in the Report. Attachment 1 provides IPL's response regarding the applicability and implementation of the recommendations pursuant to your request. If you have any questions, feel free to contact me at (319) 786-4440.

Sincerely,

A handwritten signature in cursive script that reads "D.R. Kopp".

Douglas R. Kopp
Vice President Environmental Affairs

Enclosure

Cc: Bill Skalitzky
Jenna Wischmeyer

Attachment 1

6th Street Generating Station Final Report Round 10 Dam Assessment Recommendations

Interstate Power and Light Company (IPL) is currently studying options for closing out the ash ponds at the former 6th Street Generating Station. Although we do not have an estimated closure date, we will continue communicating with the Iowa Department of Natural Resources (IDNR) as closure plans are developed.

Recommendations Priority 1

1. Prepare an EAP for the facility by August 31, 2013.

IPL will prepare an Emergency Action Plan (EAP) by August 31, 2013.

2. Monitor potential seepage through embankments starting August 31, 2013.

IPL will continue to follow the Operations & Maintenance plan (O&M plan) developed for the site. As monthly; quarterly; and annual inspections by a third party engineer are part of the O&M plan, these seepage inspections are already being performed and will continue until the ponds are properly closed out. Any seepage observed will be addressed consistent with the O&M plan.

3. Monitor potential erosion in drainage ditch and creek starting by August 31, 2013.

IPL will continue to follow the O&M plan developed for the site. As monthly; quarterly; and annual inspections by a third party engineer are part of the O&M plan, embankment integrity inspections are part of the inspection program. If conditions warrant, these areas will be repaired pending approval from the IDNR and adjoining land owners. The water levels in the ponds have decreased since the EPA Contractor assessment thereby reducing the risk of failure. Any seepage observed will be addressed consistent with the O&M plan.

4. Control vegetation on the upstream slopes, crest and downstream slopes and remove trees from the embankments. Follow Interstate IPL Site Specific Operations and Maintenance Plan and review by third party PE for specific guidance regarding which trees to remove and the timing of their removal as well as the timing of vegetation control.

IPL will continue to follow the O&M plan developed for the site. All of the embankment slopes are vegetated with grass and will be controlled consistent with the O&M Plan. If the inspections determine the vegetation requires cutting, a work order will be created to accomplish this work. Since the ponds will be closed in the near future, specific trees may not be removed as they could be part of the closure plan. IPL and/or third party engineer will continue to inspect these areas of trees to determine if an embankment stability concern is present and will remove trees as needed.

Recommendations Priority 2

- 1. Repair erosion of embankments by August 31, 2013 if the repairs are required by the IPL Site Specific Operations and Maintenance Plan and review by the third Party PE.**

As provided in item #3 above, IPL will continue to follow the O&M plan developed for the site. As monthly; quarterly; and annual inspections by a third party engineer are part of the O&M plan, embankment integrity inspections are part of the inspection program. If conditions warrant, these areas will be repaired pending approval from the Iowa Department of Natural Resources and adjoining land owners. The water levels in the ponds have decreased since the EPA Contractor assessment thereby reducing the risk of failure. Any seepage observed will be addressed consistent with the O&M plan.

- 2. Maintain a log of maintenance and other activities at the bottom ash impoundments and supporting facilities as described in the IPL Site Specific Operations and Maintenance Plan starting August 31, 2013.**

As described in the Corporate and Site Specific O&M plan, all inspections, maintenance and repair activities are documented as they are performed. IPL will continue to follow the O&M plan until the ponds are properly closed out.