

US EPA ARCHIVE DOCUMENT



Wisconsin Power and Light Co.  
An Alliant Energy Company

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April 15, 2013

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**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

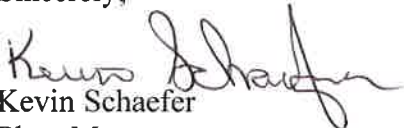
**Re: Interstate Power and Light Company – Sutherland Generating Station  
Response to March 13, 2013 EPA letter and Final Report Round 10 Dam  
Assessment**

Dear Mr. Hoffman:

On March 13, 2013, Interstate Power and Light Company's Sutherland 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 (641) 754-4901.

Sincerely,

  
Kevin Schaefer  
Plant Manager

Enclosure

Cc: Bill Skalitzky  
Jenna Wischmeyer

## Attachment 1

### Sutherland Generating Station Final Report Round 10 Dam Assessment Recommendations

#### 4.2.1 Hydrologic and Hydraulic Recommendations

*“AMEC recommends an evaluation of the ponds to determine if the freeboard can be increased if the plant returns to burning coal:”*

Since the facility ceased burning coal, the levels in the ponds have dropped to the point where the facility has not had a discharge from the ponds in over a year. If the facility burns coal in the future, IPL will conduct any necessary study; evaluation; and possibly redesign of the pond to ensure adequate freeboard to handle a 100 year, 24 hour rain event.

#### 4.2.2 Geotechnical and Stability Recommendations

*“AMEC recommends a seismic analysis using effective stress parameters be performed to meet the stability analysis requirements for the Main Pond.”*

IPL will contact our geotechnical consultant to discuss the recommended stability analysis given the current operational status of the facility. If the geotechnical consultant agrees with the recommendation, IPL will perform this analysis by July 31<sup>st</sup>, 2013.

*“AMEC recommends IPL periodically mow the area to allow inspections of the embankments”.*

IPL will continue to follow the Operations and Maintenance Plan (O&M Plan) developed for the site. All of the embankment slopes are vegetated with grass and all areas are mowed twice per year. If the inspections determine the vegetation requires cutting, a work order will be created to accomplish this work. Any areas of concern (such as animal burrows, steep and exposed slopes) will be addressed per the site O&M Plan.

#### 4.2.3 Inspection Recommendations

*“AMEC commends Alliant Energy’s Corporate and Site Plan initiatives. Provided the maintenance issues described herein are addressed, the proposed inspections and subsequent maintenance will provide a means to monitor and maintain the overall condition of the ponds”.*

Since the AMEC inspection and prior to issuance of the Draft Report, IPL developed an O&M Plan for the site that incorporates guidance documents from four Federal Agencies and our Engineering Company (Hard Hat Services, formally Aether db). Training has also been provided. IPL appreciates AMEC and EPA’s positive feedback and is committed to the safe operation of our ash pond system through the implementation of our Corporate and Site Specific O&M Plans.