NOTE

Subject: EPA Comments on Alliant Energy Columbia Power Station, Pardeeville, WI Round 7 Draft Assessment Report

To: File
From: Jana Englander, OSWER, US EPA

Date: January 20, 2011

1. On p. 16, the draft report provides two different ratings for the PP unit - Less than Low, and Low (Second paragraph: Low; and Third paragraph: Less than Low). On p. 57, PP unit is rated Less than Low. Please correct.

State:

From: "Fauble, Philip N - DNR" <Philip.Fauble@Wisconsin.gov>
To: James Kohler/DC/USEPA/US@EPA
Cc: "Lynch, Edward K - DNR" <Edward.Lynch@Wisconsin.gov>, "Kralick, James A - DNR" <James.Kralick@Wisconsin.gov>
Date: 02/11/2011 04:54 PM
Subject: RE: Comment Request on Alliant's Columbia Power Station Draft Report

Jim,

Thank you for the opportunity to comment on the Draft Assessment Report. However, we have reviewed the report and have no substantive comments to offer. Based on our knowledge of the site, the information presented is accurate.

P Philip Fauble, P.G.
Mining & Beneficial Reuse Program Coordinator
Bureau of Waste & Materials Management
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Company: See attached letter dated March 3, 2011

Wisconsin Power and Light Co.
An Alliant Energy Company

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March 3, 2011

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

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

Re: Response to Draft Assessment Reports
Columbia Generating Station

Dear Mr. Hoffman:

This letter is sent on behalf of Wisconsin Power and Light Company's ("WPL") Columbia Generating Station. WPL received the Draft Report, Round 7 – Dam Assessment – Wisconsin Power & Light, Columbia Generating Station, dated January 17, 2011 ("Draft Report"). The site assessment was conducted by the United States Environmental Protection Agency's ("EPA") contractor GZA GeoEnvironmental, Inc. on September 28, 2010. EPA's cover email accompanying the Draft Report requests that comments be submitted to USEPA by March 7, 2011, and provides for a business confidentiality claim covering all or part of the information.

CONFIDENTIAL BUSINESS INFORMATION CLAIM

WPL is claiming business confidentiality for both the Draft and Final Reports associated with the site assessment of the coal combustion material management units at the Columbia Generating Station and for the comments submitted in this letter in their entirety, a claim which is being made in accordance with 40 C.F.R. Part 2, Subpart B.

Per the criteria established by 40 CFR. Part 2, Subpart B, §2.208, the documents for which confidential treatment is requested are entitled to confidential treatment because: (1) this claim is timely and has not been waived, (2) WPL has taken reasonable measures to protect the confidentiality of the information and intends to continue to take such measures, (3) the information is not reasonably obtainable without WPL's consent by other persons by use of legitimate means, (4) no statute

specifically requires disclosure of this information, and (5) the disclosure of the information is likely to cause substantial harm to WPL's competitive position.

All of the documents for which confidential treatment is requested help WPL maintain its competitive position. WPL protects the confidentiality of this information by making it available only to those within the company with a legitimate need to know the information for purposes of performing their jobs.

COMMENTS ON THE DRAFT ASSESSMENT

Listed below are the comments associated with the Draft Report for the WPL – Columbia Generating Station.

Italics indicate language in Draft Report. **Bold** indicates suggested language.

Landfill Storm Water Pond (LSP) Rating:

1. The Landfill Storm Water Pond was rated as *"Fair"* by the assessment team. We agree that certain items require attention, but the pond should be rated as **"Satisfactory"** for the following reasons:
   - Storm Water Pond Levels – Maintaining the level in the pond at 794.85 feet was just incorporated into the new Landfill Plan of Operations that was submitted to the Wisconsin Department of Natural Resources (WDNR). During the time of the assessment, the storm water pond was being managed based on the old Landfill Plan of Operations for ash contact water in Module 1.
   - Storm Water Pond Embankments – We agree that there are a number of trees in the upper portion of the embankments that need to be removed. However, the widths of the embankments are approximately 75 feet with the top crest elevation of 825 feet around the entire pond except near the active portion of the landfill.
   - Satisfactory Rating – Appendix C, Page 2 of the Inspection Summary for the Landfill Storm Pond states "*Satisfactory*"

   References regarding the rating of the landfill storm water pond can be found on the following pages: Cover Letter (second paragraph); Page i Executive Summary (fifth paragraph); Page 14, Section 2.1.15 (first paragraph); Page 17, Section 3.1 (first paragraph); Page 18, Section 4.0.

Executive Summary:

1. Page i, Second Paragraph, third sentence – The purpose of the Primary and Secondary Ash Ponds is not for the *"purpose of storing CCW waste"*. The purpose of the ponds is (1) to provide treatment of the process wastewater to ensure compliance with the site WPDES permit, (2) to efficiently remove settled ash for beneficial reuse or landfilling, and (3) to reuse the ash pond water in our various processes to reduce

impacts on our source water and receiving stream. Please reword this sentence to reflect our operations.

2. Page ii, Studies and Analyses, second and third recommendation - Please find the attached Columbia Ash Pond Analysis report prepared by Aether dbs on behalf of the Columbia Energy Center. Both of these recommendations should be removed.

Primary and Secondary Ash Ponds:

1. Significant Hazard Ratings for the Primary and Secondary Ash Ponds – Both ash ponds were rated as *"Significant Hazard Structures"* based on the assessors' opinion and guidance from EPA. We believe both of the ponds should be rated as **"Low Hazard Potential"**, based on EPA guidance, for the following reasons:
    - Misoperations – The ash ponds were designed to remove accumulated ash on an as needed basis. The influent channel of the Primary Pond is where most of the ash is allowed to settle out. This settled ash is removed two times per week throughout the year, except during the winter months in which the ash is removed monthly (or on an as-needed basis). Our operations and maintenance of the ponds and equipment does not meet the intent of misoperations. In addition, the plants ability to reuse ash pond water in other plant operations ensures the pond system is operating in an effective manner.
    - Economic Loss – A failure of these ponds would not cause economic loss since there is very little ash in the pond and there are no other businesses in the immediate area that cause a concern.
    - Environmental Damage – What little ash is in the pond would stay within the confines of the pond or be captured in the lowlands of Duck Creek. A release of ash from this pond would not be in the same level as the TVA Kingston release.
    - Disruption of Lifelines – There are no bridges or other lifelines downstream from the ash pond that would prevent or alter emergency vehicles or services as a result of a failure with the secondary emergency ash pond.

References regarding the rating of the primary and secondary ash ponds can be found on the following pages: Page i, Executive Summary (last paragraph); Section 1.2.10 (two references, first and last paragraph); Appendix C, Primary and Secondary Ash Pond Inspection Forms.

Section 1.2.3:

1. Page 2, Purpose of the Impoundments – As mentioned in our comment above for the Executive Summary, the paragraph describing the purpose of the primary and secondary ash pond needs to changed. The purpose of the ponds is (1) to provide treatment of the process wastewater to ensure compliance with the site WPDES permit, (2) to efficiently remove settled ash for beneficial reuse or landfilling, and (3) to reuse the ash pond water in our various processes to reduce impacts on our source water and receiving stream.

2. Page 3, Second and Third Paragraph, Secondary and Polishing Pond Ash Ponds – The statements used to describe the operational conditions of Secondary and Primary Ash Ponds are not accurate. This pond can receive water from the primary ash pond through the pumphouse located on the primary pond. In accordance with the site WPDES permit (WI0002780), the site can pump water from the secondary pond to the polishing pond and through Outfall 002 if certain conditions regarding Whole Effluent Toxicity (WET) testing are met. Water levels in the primary ash pond dictate when and if the site pumps water into the secondary ash pond. Due to past positive results with WET testing of the discharge (2004), a decision was made to discontinue the use of the pumphouse on the secondary ash pond and reuse or recycle the water in the primary ash pond.

Section 1.2.5:

1. Page 4, first paragraph, Primary Ash Pond Wastestreams – Please insert **"non-chemical boiler/turbine/precipitator wash or rinsate water"** to describe the type of wash waters from these cleaning operations. Boiler/turbine/precipitator washes can be chemical and non-chemical in nature. If a chemical is used, the chemical clean material and the first two rinses are captured and stored in tanks pending analysis. This material is processed in the boilers per the sites Title V Operating permit.

Section 1.2.5:

1. Page 5, first paragraph – Please remove *"Prior to being deactivated in 2004"* and start the sentence with *"The SAP…."*. Remove the sentence *"Since 2004"* and consider the following: **"Waters transferred from the PAP and precipitation that collects in the SAP either infiltrates into the ground or evaporates"**.

Section 1.2.6:

1. Page 5, second paragraph – Please remove *"The PP is currently inactive and is not currently permitted to receive CCW waste materials"*. The PP can receive treated effluent from the Secondary Ash Pond and discharge through Outfall 002 if certain conditions of the WPDES permit are met. Please insert the following: **"The PP can receive effluent from the SAP and discharge through Outfall 002 if certain conditions are met as listed in the WPDES Permit. However, since 2004, the PP has not received any effluent from the SAP"**.

Section 1.2.8:

1. Page 7, first paragraph, WPDES Permit – Please remove *"EPA"* and insert **"WDNR"** since the department is an authorized State to issue and enforce permits. Also, remove *"NPDES"* and insert **"WPDES"** since the permit was issued by the WDNR.

Section 2.1.4:

1. Page 12, first paragraph, third and fourth sentence – In the sentence *"The backwaters of the Wisconsin River are generally near the downstream slope of the SAP"*. The nearest body of water to these ponds is Duck Creek and not the Wisconsin River.

During the assessment, the flood waters from the Wisconsin River backed up into Duck Creek. During non-flooding events, there is a minimum of 200 feet from the toe of the pond to Duck Creek. Please see Figure #2 of the report as a reference. Please note that on Figure #2, Duck Creek backwaters are labeled as the Wisconsin River.

Section 2.1.9:

1. Page 13, first paragraph, third and fourth sentence – Same comment as Section 2.1.4 above. In the sentence *"The backwaters of the Wisconsin River are generally near the downstream slope of the PAP"*. The nearest body of water to these ponds is Duck Creek and not the Wisconsin River. During the assessment, the flood waters from the Wisconsin River backed up into Duck Creek. During non-flooding events, there is a minimum of 200 feet from the toe of the pond to Duck Creek. Please see Figure #2 of the report as a reference. Please note that on Figure #2 and #3, Duck Creek backwaters are labeled as the Wisconsin River.

Section 2.5 and Section 2.6:

1. Page 16, Hydrologic/Hydraulic Data and Structural Stability Information – Please find the attached Columbia Ash Pond Analysis report prepared by Aether dbs on behalf of the Columbia Energy Center. Please revise these sections to reflect the information in the Aether dbs report.

Section 3.2:

1. Page 17, List number 2 and 3, Hydrologic/Hydraulic Data and Structural Stability – – Please find the attached Columbia Ash Pond Analysis report prepared by Aether dbs on behalf of the Columbia Energy Center. Please revise this section to reflect that the studies have been completed.

Section 3.3:

1. Page 17, Recommendation #6, Hydrologic/Hydraulic Data and Structural Stability – Maintaining the level in the pond at 794.85 feet was just incorporated into the new Landfill Plan of Operations that was submitted to the Wisconsin Department of Natural Resources (WDNR). During the time of the assessment, the storm water pond was being managed based on the old Landfill Plan of Operations for ash contact water in Module 1.

REQUEST FOR CONFERENCE CALL WITH GZA TO REVIEW COMMENTS

Finally, because of the technical complexity and factual detail contained in the Draft Report, WPL believes it would be efficient and helpful to conduct a conference call between WPL and GZA GeoEnvironmental to review the details of these comments prior to its preparation of a Final Report. WPL would be happy to coordinate the time and set up a call-in number. WPL specifically requests such a discussion.

WPL appreciates this opportunity to provide comments on the Draft Report for the Columbia Generating Station. If you have any technical questions, please contact William Skalitzky at (608) 458-3108. If you have any legal questions, please contact Dan Siegfried at (319) 786-4686.

Very truly yours,

Terry L. Kouba
Director, Generation Operations

cc: James Kohler - EPA
William Skalitzky - AECS
Dan Siegfried - AECS
Jerald Lokenvitz - WPL