

NOTE

Subject: EPA Comments on Alliant Energy, Lansing Power Station, Lansing, IA
Round 7 Draft Assessment Report

To: File

From: Jana Englander, OSWER, US EPA

Date: January 6, 2011

1. On p. 18, the report states that the NPDES Permit No. 0300100 was issued on October 2, 1998 and expired on October 1, 2003. Has there been activity to renew the NPDES Permit, please clarify status.

State Comments: None

Company Comments: See attached letter dated March 4, 2011



March 4, 2011

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

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

**Re: Response to Draft Assessment Reports
Lansing Generating Station**

Dear Mr. Hoffman:

This letter is sent on behalf of Interstate Power and Light Company's ("IPL") Lansing Generating Station. IPL received the Draft Coal Combustion Waste Impoundment, Round 7 – Dam Assessment Report for Lansing Energy (Site #11) dated November, 2010 ("Draft Report"). The site assessment was conducted by the United States Environmental Protection Agency's ("EPA") contractor Dewberry & Davis, LLC on October 5, 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

IPL 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 Lansing 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) IPL 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 IPL'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 IPL's competitive position.

All of the documents for which confidential treatment is requested help IPL maintain its competitive position. IPL 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 IPL – Lansing Generating Station.

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

General Comment:

1. Remove "*Alliant Energy*" and insert "**Interstate Power and Light Company**" "IPL". This should include "*Alliant Energy*" references in the footer of each page. References for "*Alliant*" can be found on Page ii (1 reference in second paragraph and fourth paragraph); Page 1-1 (1 reference in first paragraph of Section 1.1 and first paragraph of Section 1.1.3); Page 1-2 (1 reference in first paragraph of Section 1.1.6; first paragraph of Section 1.1.7; first paragraph of Section 1.2.1); Page 2-1 (1 reference in first paragraph of Section 2.1); Page 2-4 (1 reference in third paragraph); Page 3-1 (first paragraph of Section 3.1); Page 3-1 (first paragraph of Section 6.1.2); Page 6-2 (third paragraph of Section 6.1.4); Page 6-3 (first paragraph on page)reference and Page 2-3 (2 references in third paragraph).
2. Remove "*Fly Ash*" from the description of our ash ponds and describe them as "**Ash Ponds**" or "**Bottom and Fly Ash Ponds**". References for "*fly ash*" can be found on Page ii (3 references in second paragraph); Page ii (1 reference in third paragraph); Page 2-1 (1 reference in first paragraph); Page 2-2 and Page 2-3 (2 references in third paragraph); Page 2-4 (1 reference in second paragraph. Insert "**bottom**" or **rename "ash"** in the sentence "*The intent is to have no net increase of FLY ash in the pond*"; Page 2-4 1 reference in Ash Pond 2 Surface Impoundment. Insert "**bottom**" or **rename "ash"** in the sentence "*this pond does not contain significant amount of FLY ash deposits...*";

Cover Page:

1. Cover Page – Remove "*Alliant Energy*" and insert "**Interstate Power and Light Company**" or "IPL".
2. Cover Page - Remove "*Lansing Energy*" and insert "**Lansing Generating Station**".

Introduction:

1. Page ii, Fourth Paragraph – Remove “*completed within a year*” and insert “**should be completed once all regulatory approvals from the Army Corp of Engineers and Iowa Department of Natural Resources (IDNR) because of possible floodplain and endangered species concerns**”.

Section 1.2.1:

1. Page 1-2, first paragraph – The recommendation is to perform a structural stability analysis on Ash Pond 1 west dike since this dike is the “*the highest of the Lansing Stations dikes*”. This is incorrect. Sargent and Lundy (S&L) Calculation No. LANS-SS-001, Slope Stability Analyses - Ash Settling Pond Dikes evaluates the section of dike between the Upper Ash Pond and the Lower Ash Pond (the northern dike of Ash Pond I). The dike that separates the Upper and Lower Ash Ponds; Section 11-11 on Lansing Power Station design drawing S-14 (Site Development, Ash Pond Dikes, Sheet 1, Rev. E) shows the top of dike elevation as 654.0', Upper Ash Pond bottom elevation of 624.0' and the Lower Ash Pond bottom elevation as 620.0'. As listed in the Section 2.0 Design Inputs of the S&L calculation, this section of dike was used since it's maximum height of 34' represents the tallest portion of the dike. Furthermore, as shown on Figure 2 of the S&L calculation, the phreatic surface modeled considers a zero water depth in the Lower Ash Pond, thereby evaluating the most critical of downstream dike conditions. According to Section 9-9 on Lansing Power Station design drawing S-14, the top of the Ash Pond I dike is elevation 654.0', the bottom of the pond is elevation 624.0' and the outside toe of the dike is approximately at elevation 630.0'. Thus having an inner dike height of 30' and an outer dike height of 24'. Based on this information, this recommendation should be removed, except for the removal of the trees and vegetation pending regulatory approval.

Section 1.2.6:

1. Page 1-3, first paragraph – Please insert the following language: “**pending approval from the Army Corp of Engineers and Iowa Department of Natural Resources**”.

Section 1.3.1:

1. Page 1-5, List of Participants – Remove “*Alliant Energy*” and insert “**Interstate Power and Light Company**” for William Sangster. The correct Company/organization for William Skalitzky and Jenna Wischmeyer is “**Alliant Energy Corporate Services, Inc.**”

Section 2.1:

1. Page 2-1, second paragraph – Remove “*The Lansing Station has two impoundments designated for DISPOSAL of coal combustion wastes*” and replace with “**The Lansing GENERATING STATION has two impoundments that RECEIVE WASTEWATERS CONTAINING coal combustion wastes...**”. The facility dredges

coal combustion products for beneficial reuse or disposal in the approved onsite landfill or other approved landfills.

2. Page 2-1, third and fourth paragraph – As mentioned in Comment 1 of Section 1.2.1, the maximum dike height of Ash Pond 1 is 34 feet.
3. Page 2-1, fourth paragraph, second sentence – Remove “*retail*” and insert “**Beneficially Reused**” since the IDNR governs the potential uses of our coal combustion products.

Section 2.3:

1. Page 2-4, first paragraph – Remove “*fly ash*” in the sentence “*Ash Pond 2 receives effluent water after it has passed through the chambered southerly portion of Ash Pond 1*”.
2. Page 2-4, second paragraph – This paragraph needs revision to accurately account for the activities associated with these ponds. The first two sentences contain the correct information. Starting with the third sentence, insert the following: “**Materials stored in the Ash Pond 1 MAY include fly ash; bottom ash; and economizer ash from past sluicing activities. Wastewaters sent to the pond for further treatment include bottom and fly ash sluice waters; non-chemical air heater and boiler wash waters; ash seal water; and storm water contributions from the on-site landfill. Ash is removed from the southern portion of Ash Pond 1 on a regular basis to ensure compliance with the site NPDES permit. Dredged ash is either beneficially reused or landfilled. The intent is to have no net increase of ash in the pond. Most ash settles within the channelized portion of the pond. Normal pool elevation at the time of the inspection was at 650.0 feet. At the time of our visit, Boiler Unit #4 was sluicing bottom ash into the pond**”.
3. Page 2-4, third paragraph – Please reword the third paragraph to the following: “**Based on information from IPL, this pond does not contain a significant amount of ash deposits since most of the ash settles out in Ash Pond 1 and this pond was excavated in 2002. Normal pool elevation at the time of the inspection was about 631 feet**”.

Section 3.2:

1. Page 3-1, first paragraph, NPDES Permit – Please insert the following language at the end of the last sentence: “**IPL is authorized to continue discharging under the existing NPDES Permit since the NPDES Permit Renewal Application was submitted at least 180 days prior to the expiration of the permit. The reason for the delay in issuance of the permit is a backlog of NPDES permit renewal applications at the State of Iowa**”.

Section 4.1:

1. Page 3-1, second paragraph, Plant Construction History – Remove the sentence as it appears additional generation has been installed since 1977, which was when Unit #4 was constructed. In the third sentence, remove “275 MW” and insert “**339 MW**”.

Section 4.2.1:

1. Page 4-2, first paragraph, second sentence – Remove “disposal” and insert “**for the treatment of boiler slag and ash sluicing wastewaters**”.

Section 4.2.2:

1. Page 4-2, first paragraph, second sentence – Remove “Mining of the C-Stone, or fly ash from the Ash Pond 1 for beneficial reuse was started about 5 years ago” and insert the following: “**Dredging of the bottom and fly ash from Ash Pond 1 for beneficial reuse began when these rules were implemented by the IDNR. Ash not used in the beneficial reuse program is landfilled**”.

Section 5.2.2:

1. Page 5-4, first paragraph, second sentence – After “square weir inlet box” insert “**(adjustable with stop-logs)**”.
2. Page 5-4, Photograph 3.1 – Remove “intake” in front of structure since this an outfall structure not a water intake structure.

Section 5.3.2:

1. Page 5-6, first paragraph, Outlet Structures – In the last sentence of this page, remove “Outfall 1” and insert “**Outfall 002**”. Outfall 001 is the condenser discharge for Boilers 1,2,3, and 4.
2. Page 5-7, First Paragraph, Outlet Structures – Remove “Outfall 002 is a combination of the NPDES permit Outfalls 001 and 002”. Outfall 001 is the condenser discharge and Outfall 002 is the ash pond discharge.

Section 6.1.4:

1. Page 6-2, first paragraph, first sentence – We disagree that a failure of the west side dike “could release a significant volume of ash” into the roadside ditch. Since the majority of the settled ash is contained in the upper portion of Ash Pond 1 and is actively removed, the potential volume of ash is not “significant”. If a failure were to take place on the west side dike, the most likely location of said failure would be near Power Plant Drive. In addition, according to Section 9-9 on Lansing Power Station design drawing S-14, the top of the Ash Pond 1 dike is elevation 654.0', the bottom of the pond is elevation 624.0' and the outside toe of the dike is approximately at elevation 630.0', thus having an inner dike height of 30' and an outer dike height of 24'. This means the bottom of Ash Pond 1 is six feet below the toe of the dike, so if the dike failed any settled ash would be below the toe of the dike and would be contained within the Ash Pond. This area of Pond 1 contains very little ash and wastewater that is already treated to meet effluent limits of Outfall 002.

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Section 8.1:

1. Page 8-1, first paragraph, first sentence – Insert “**bottom and fly ash**” that describes the type of ash the pond receives.
2. Page 8-1, first paragraph, last sentence – Remove this entire last sentence and insert the following: “**Other plant WASTEWATERS discharged into Ash Pond 1 for treatment include the following: NON-Chemical boiler and turbine wash and rinsate waters, boiler blowdown, steam grade water production wastewaters, plant floor drains, and storm water runoff from the landfill**”.
3. Page 8-1, Figure 8.1 – Remove “*Fly*” in the caption describing where sluiced ash enters Pond 1.

REQUEST FOR CONFERENCE CALL WITH DEWBERRY TO REVIEW COMMENTS

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

IPL appreciates this opportunity to provide comments on the Draft Report for the Lansing 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
Vernon Hasten - IPL
William Sangster - IPL