Interstate Power and Light Co.
An Alliant Energy Company

200 First Street SE
P.O. Box 351
Cedar Rapids, IA 52406-0351

Office: 1.800.822.4348
www.alliantenergy.com

August 23, 2011

Via E-mail to: Hoffman.Stephen@epamail.epa.gov

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

Re: Interstate Power and Light Company – Lansing Generating Station Response to July 26, 2011 EPA letter and Final Coal Combustion Waste Impoundment Round 7-Dam Assessment Report

Dear Mr. Hoffman:

On July 26, 2011, Interstate Power and Light Company's Lansing Generating Station ("IPL") received the United States Environmental Protection Agency's ("EPA") "Final Coal Combustion Waste Impoundment Round 7-Dam Assessment Report" ("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 August 23, 2011 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 (563) 538-3118.

Sincerely,

William H. Sangster / Alan L. Stieber

William H. Sangster
Plant Manager

Enclosure

Cc: Bill Skalitzky
Jenna Wischmeyer

Attachment 1

Lansing Generating Station
Final Coal Combustion Waste Impoundment Round 7-Dam Assessment Report Recommendations

1.2.1. Recommendations Regarding the Maintenance and Methods of Operation

EPA's Observation and Recommendation:
Removal of tree vegetation and brush vegetation is recommended along all the dike slopes. Removal of the trees and brush vegetation along the Ash Pond 1 west outside dike should be completed once all regulatory approvals are received from the Army Corps of Engineers and Iowa Department of Natural Resources (IDNR).

IPL's Response:
Brush vegetation will be mowed in accordance with the Operations and Maintenance Plan (O&M Plan) discussed in item 8.3.2 below. Removal of trees will also be performed in accordance with the O&M Plan.

1.2.2 Recommendations Regarding the Surveillance and Monitoring Program

EPA's Observation and Recommendation:
It is further recommended that internal inspection of the outlet structures be performed at a frequency of at least once every 6 months and be documented with a written report.

IPL's Response:
Inspections of the outlet structures of the Lansing ash ponds will be conducted twice annually by the Lansing Environmental and Safety specialist and a Professional Engineer with Aether DBS, who will document the inspection and maintain a file of inspection reports. This will be incorporated into the O&M Plan being developed by Aether DBS and discussed in more detail below.

8.3.2 Adequacy of Maintenance

EPA's Observations and Recommendations:
Although the current maintenance program appears to be adequate for the site, several recommendations are provided to improve maintenance and ensure a trouble free operation:

- Develop a written operations and maintenance plan
- Remove trees from dike embankments for both Ash Ponds

IPL's Response:
IPL, along with our independent consulting engineer, Aether DBS, will prepare a site-specific O&M Plan based on the following criteria:

- Corps of Engineers EM 111 0.2.301, *Guidelines for Landscape Planting and Vegetation Management at Floodwalls, Levees, and Embankment Dams;*

- FEMA 534, *Technical Manual for Dam Owners: Impacts of Plants on Earthen Dams;*
- FEMA 473, *Technical Manual for Dam Owners: Impacts of Animals on Earthen Dams;* and
- U.S. Department of Labor, Second Edition, May 2009: *Engineering and Design Manual for Coal Refuse Disposal Facilities, Chapter 12: Monitoring, Inspections, & Facility Maintenance*

The O&M Plan is likely to include semi-annual inspections by plant staff and an annual inspection by a professional engineer from Aether DBS. The Plan will be developed and implemented, including training for selected power plant personnel, no later than May 1, 2012.

As part of the development of the O&M Plan, IPL and Aether DBS will evaluate the necessity to remove the larger trees based on the slope stability reports and the impact the removal may have on the overall integrity of the dikes. This evaluation is expected to be completed by December 31, 2011. All small trees and brush will be maintained in accordance with the O&M Plan. Prior to any tree removal, an endangered species review will need to be conducted. In addition, any necessary approvals or permits will need to be obtained from the Iowa Department of Natural Resources and Army Corp of Engineers. IPL anticipates removing those trees identified in the O&M Plan by June 1 2012, pending receipt of all required regulatory approvals.