Interstate Power and Light Co.
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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 – Ottumwa 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 Ottumwa 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 (319) 786-2905.

Sincerely,

Jim Allen
Plant Manager

Enclosure

Cc: Bill Skalitzky
Jenna Wischmeyer

Attachment 1

Ottumwa 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:
Although the maintenance program appears adequate, the following recommendations could improve maintenance and operation:

- Develop a written operations and maintenance plan
- Repair erosion rills on the down-gradient slopes, particularly the Ash Settling Pond south dike along the east end
- Clear vegetation at the Ash Settling Pond primary spillway pipes down-gradient discharge location
- Remove trees from dike embankments
- Monitor surface drainage at the toe of the Zero Liquid Discharge Pond to evaluate impacts of Des Moines River flood water.

IPL's Response:
Develop a written operations and maintenance plan
IPL, along with our independent consulting engineer, Aether DBS, will prepare a site-specific operations and maintenance plan ("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.

Repair erosion rills on the down-gradient slopes, particularly the Ash Settling Pond south dike along the east end
IPL will repair the erosion rills by October 30, 2011 and will incorporate inspection of the rill repairs in the O&M Plan being developed by IPL and Aether DBS.

Clear vegetation at the Ash Settling Pond primary spillway pipes down-gradient discharge location

IPL will remove the vegetation by October 30, 2011 and will incorporate an inspection program in the O&M Plan being developed by IPL and Aether DBS.

Remove trees from dike embankments

IPL has removed all interior dike trees from the Ash Pond and Zero Liquid Discharge Ponds. 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.

Monitor surface drainage at the toe of the Zero Liquid Discharge Pond to evaluate impacts of Des Moines River flood water.

As part of the development of the O&M Plan, IPL and Aether DBS will monitor the area indicated and appropriately minimize surface drainage, if warranted. The O&M plan will include this area as part of the inspection program. IPL will complete this task by May 1, 2012