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September 20, 2024

Mr. Brian Rath
Land Quality Bureau
Iowa Department of Natural Resources
6200 Park Ave., Suite 200
Des Moines, IA 50321

**Subject: Stoney Point Closed Landfill
Permit No. 57-SDP-11-90C
Response to IDNR Comments on 2023 Annual Water Quality Report**

Dear Mr. Rath:

On behalf of Interstate Power and Light Company (IPL), Alliant Energy is respectfully providing attached responses to comments provided by the Iowa Department of Natural Resources on the 2023 Annual Water Quality Report, including a schedule for a Groundwater Quality Assessment Plan, for the closed Stoney Point located in Cedar Rapids, Iowa.

Please call me at (515) 558-9704 or email me at jennycoughlin@alliantenergy.com with any questions regarding the enclosed responses.

Sincerely,

A handwritten signature in black ink, appearing to read "Jenny Coughlin", written over a light gray rectangular background.

Jenny Coughlin
Sr. Environmental Specialist
Alliant Energy Corporate Services, Inc.

Enclosure

Cc: SCS Engineers

September 20, 2024
File No. 25224065.00

Mr. Brian Rath, PE
IDNR Land Quality Bureau
6200 Park Avenue
Suite 200
Des Moines, IA 50321

Subject: Stoney Point Fly Ash Disposal Site (Closed)
Permit #57-SDP-11-90C
2023 Annual Water Quality Report Comment Response

Dear Mr. Rath:

On behalf of Interstate Power and Light Company (IPL), SCS Engineers (SCS) has prepared this letter in response to the comments provided by the Iowa Department of Natural Resources (IDNR) on the 2023 Annual Water Quality Report (AWQR) for the above-referenced site. IDNR's comments were received by IPL in a letter dated August 8, 2024.

IDNR's comments are listed below in italic text, with IPL's response below each comment:

1. *Report Priority Items*

- a. *No priority items were requested in the report.*

No response required.

2. *Groundwater Monitoring*

- a. *The DNR agrees with the recommendations in Section 8.0 including that testing for fluoride be halted and scheduled for testing in calendar year 2028.*

No response required.

- b. *Boron levels measured at monitoring well MW-16 appear to be increasing with the latest level at 81,000 µg/l. The statewide standard for boron is 6,000 µg/l. In addition, levels of specific conductance, magnesium, and sulfate are the highest at MW-16 when compared to other monitoring wells in the shallow well grouping.*

See response to item 2.c. below.

- c. *Due to the above-noted exceedance of a statewide standard, the DNR requests that a site assessment be performed, which shall include delineation (vertically and horizontally) of boron, magnesium, and sulfate downgradient of MW-16.*



IPL has initiated an assessment as requested. As stated in Section IX. General Provisions of the November 30, 1993 Closure Permit (IDNR Doc #29590), the applicable rules are those existing at the time of permit issuance. Therefore, IPL believes that the appropriate version of Iowa Code to follow in planning the assessment is the 1989 version of Iowa Administrative Code (IAC) chapter 567-103.

In accordance with the Closure Permit and the applicable code, IPL will submit a Groundwater Quality Assessment Plan and assessment schedule by January 1, 2025. This submittal date will allow IPL to evaluate data from the most recent annual sampling event, which was conducted in early September 2024, and consider the findings of the statistical evaluations performed as part of the Annual Water Quality Report. The following items will be included in the Groundwater Quality Assessment Plan:


- Discussion of the hydrogeologic conditions at the site with an identification of potential contaminant pathways.
- Description of the present detection monitoring system.
- Description of the approach the owner or operator will take to substantiate any contention that the contamination may be falsely identified.
- Description of the investigatory approach used to characterize the rate and extent of leachate migration.
- Discussion of the number, location, and depth of wells that will be initially installed, as well as a strategy for installing more wells in subsequent investigatory phases.
- Information on well design and construction.
- Description of the sampling and analytical program used to obtain and analyze groundwater monitoring data.
- Description of data collection and analysis procedures.
- Schedule for the implementation of each phase of the assessment study.

In addition to the items above, completion of an updated receptor survey will be included in the Groundwater Quality Assessment Plan.

Sincerely,



Meghan Blodgett
Senior Hydrogeologist
SCS Engineers



Thomas J. Karwoski
Project Director
SCS Engineers

MDB/REO_jsn/TCB/TK

cc: Jenny Coughlin, Alliant Energy