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January 31, 2025

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

Subject: Semi-Annual Progress Report  
Lansing Upper Ash Pond Closure Project  
Lansing Generating Station  
Lansing, Iowa  
Permit #03-SDP-13-23C

Mr. Rath:

On behalf of Interstate Power and Light Company (IPL), Alliant Energy is submitting the enclosed semi-annual progress report for the Lansing Generating Station Upper Ash Pond Closure Project. This report is required by Special Condition #4 of Closure Permit #03-SDP-13-23C issued on February 9, 2023.

Please note that in May 2024, the U.S. EPA finalized new closure performance standards for CCR units that close in place. IPL is continuing to evaluate whether the current closure areas meet these updated standards. Amendments to the closure plans for these areas, which would be subject to IDNR review and approval, may be required.

Thank you for your review of this report. If you have any questions or concerns, please contact me via email ([jennycoughlin@alliantenergy.com](mailto:jennycoughlin@alliantenergy.com)) or by phone (515-558-9704).

Sincerely,

A handwritten signature in black ink, appearing to read "Jenny Coughlin".

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

CC: Jenni Hynek, Rob Saunders, Ken Thomas - IPL  
Jeff Maxted, Chad Wall - Alliant Energy  
Eric Nelson - SCS Engineers

**Lansing Generating Station Upper Ash Pond Closure Project**  
**IDNR Permit #03-SDP-13-23C**  
**Semi-Annual Progress Report – July 1, 2024 through December 31, 2024**  
**January 31, 2025**

1. Actions Taken to Date

- Completed design drawings and specifications for Upper Ash Pond closure and cap installation Construction Quality Assurance work at the site
- Awarded contract for closure activities in April 2021
- Completed a wetland delineation, a threatened and endangered species review, and a Phase I-A cultural resources assessment for the project area, May 2021
- Installed bridge lift fill pilot in late 2021. Bridge lift extension was completed to create northernmost berm within the Upper Ash Pond
- Installed geotechnical monitoring instruments at bridge lift location to support monitoring the berm
- Received the construction stormwater discharge permit for the project, April 2022
- Installed erosion and sediment control BMPs, May 2022
- Removed above-ground and below-ground conveyances from the Upper Ash Pond, May 2022 – July 2023
- Installed grout stabilized “wall” through the northern-most berm constructed across the Upper Ash Pond, May – August 2022
- Hydraulically excavated CCR from northern portion of Upper Ash Pond, August – October 2022
- Began consolidating CCR from the northern portion of the Upper Ash Pond, October 2022
- Ceased CCR and non-CCR discharges to the Upper Ash Pond December 2022
- Received Closure Permit (03-SDP-13-23C) from IDNR Solid Waste Section issued on February 9, 2023
- Setup temporary and supplemental wastewater treatment equipment for dewatering, March 2023
- Began dewatering the Upper Ash Pond, March 2023
- Began importing and placing infiltration layer to support final cover system, July 2023
- Completed final cover system installation, including infiltration layer, erosion layer, and seeding, September 15, 2023
- Submitted construction quality assurance report to the Iowa Department of Natural Resources, November 11, 2023
- Repaired erosion on west side of the Upper Ash Pond closure area (above the diversion berm) by adding topsoil, grading with a hand rake, and reseeding. Completed repairs January 31, 2024
- Completed additional repairs to erosion, rutting, sedimentation and washouts observed in the Upper Ash Pond closure area, April – August 2024
- IDNR inspected the site on October 15, 2024. The inspector observed erosion control measures in place and noted that IPL actively manages the site to address

issues as they arise. No significant erosion or other potential issues were observed in the ash pond closure area

- Filled subgrade and added erosion stone and check dams to the swale between the Upper Ash Pond closure area and Ash Disposal Landfill, December 2024
- Weekly inspections of the pond closure area have continued per Federal requirements
- Groundwater monitoring for compliance with State and Federal requirements has continued throughout closure activities

2. Problems Encountered and Actions Taken to Resolve Problems

<b>Problems Encountered</b>	<b>Actions Taken to Resolve Problems</b>	<b>Reporting Period of Problem and Resolution</b>
None		

3. Pending Closure Activities

- Evaluation of groundwater data
- Notification of Closure completion
- Notification of Notation in Property Deed