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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
Burlington Ash Pond Closure Project
Burlington Generating Station
Burlington, Iowa
Permit #29-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 Burlington Generating Station Ash Pond Closure Project. This report is required by Special Condition #4 of Closure Permit #29-SDP-13-23C issued on February 9, 2023, and addresses closure of the following onsite CCR units:

- Ash Seal Pond
- Main Ash Pond
- Economizer Ash Pond
- Upper Ash Pond

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) or by phone (515-558-9704).

Sincerely,

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

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

Burlington Generating Station Ash Pond Closure Project
IDNR Permit #29-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 Ash Pond closure and cap installation Construction Quality Assurance work at the site
- Awarded contract for closure activities in April 2021
- Received the construction stormwater discharge permit for the project in May 2021
- Ceased coal-fired operations and discharge of new CCR waste to the CCR units, December 31, 2021
- Installed erosion and sediment control BMPs, May 2022
- Setup temporary and supplemental wastewater treatment equipment for dewatering, June 2022
- Began dewatering, June 2022
- Began consolidating material from Ash Seal Pond and Upper Ash Pond into closure area, August 2022 and March 2023, respectively
- Removed above-ground and below-ground conveyances from Ash Seal Pond and Main Ash Pond, July – September 2022, and from Economizer Ash Pond and Upper Ash Pond, June – December 2022
- Constructed berm buttress in Upper Ash Pond, September – November 2022
- Began backfilling Ash Seal Pond, November 2022
- Ceased non-CCR wastewater discharge to CCR units, December 5, 2022
- Received Closure Permit (03-SDP-13-23C) from IDNR Solid Waste Section issued on February 9, 2023
- Began importing and placing infiltration layer to support final cover system, May 2023
- Completed installation of final cover system, including infiltration layer, erosion layer, and seeding, October 3, 2023
- Prepared construction documentation report for IDNR (yet to be submitted)
- Cap areas on both the Economizer Ash Pond and the Main Ash Pond were disturbed to facilitate subsurface evaluations and restored to meet federal CCR rule requirements. IDNR was notified January 25 and again April 10, 2024, regarding planned cap disturbances. Documentation of cap restoration is ongoing
- Communicated change in design of ramp on Economizer Ash Pond closure area from grass to gravel cover material to IDNR on June 1, 2024. IDNR approved the change on June 3, 2024
- Renewed industrial stormwater discharge permit for an additional year of coverage (payment submitted July 2024, coverage expires October 2025)
- Repaired ruts and damage to the cap from drilling rig following subsurface evaluation activities in the Economizer Ash Pond and Main Ash Pond, June 2024
- Submitted documentation of repairs cap repairs and ramp construction to IDNR, September 17, 2024
- Weekly inspections of the pond closure area have continued per Federal requirements

- Groundwater monitoring for compliance with Federal requirements has continued throughout closure activities

2. Problems Encountered and Actions Taken to Resolve Problems

Problems Encountered	Actions Taken to Resolve Problems	Reporting Period of Problem and Resolution
The Main Ash Pond final cover system was disturbed during replacement of transmission line support structures located within the surface impoundment closure area.	IPL verbally notified IDNR of the disturbance. Written notification to the department followed on December 4, 2024, and IPL engaged SCS Engineers to develop a plan to repair the disturbance in spring 2025.	The disturbance was identified November 21, 2024, and IPL notified the department in writing of the incident on December 4, 2024. In a letter dated December 16, 2024, IDNR requested an operations plan detailing the necessary repairs, to be submitted by January 16, 2025. Repairs will be addressed in the next reporting period.

3. Pending Closure Activities

- Repairs to disturbed areas of the final cover system
- Evaluation of groundwater data
- Post-construction administrative work, including project closeout and construction documentation
- Notification of Closure completion
- Notification of Notation in Property Deed