

US EPA ARCHIVE DOCUMENT



Wisconsin Power and Light Co.
An Alliant Energy Company

Corporate Headquarters
4902 North Biltmore Lane
Suite 1000
Madison, WI 53718-2148

1-800-ALLIANT (255-4268)
www.alliantenergy.com

April 15, 2013

Via E-mail to: hoffman.stephen@epa.gov

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

**Re: Wisconsin Power and Light Company – Edgewater Generating Station
Response to March 13, 2013 EPA letter and Final Report Round 10 Dam
Assessment**

Dear Mr. Hoffman:

On March 13, 2013, Wisconsin Power and Light Company's Edgewater Generating Station ("WPL") received the United States Environmental Protection Agency's ("EPA") "Final Report Round 10 Dam Assessment" ("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 WPL respond by April 15, 2013 with specific plans and schedules for implementing the recommendations.

WPL has carefully reviewed the findings and recommendations contained in the Report. Attachment 1 provides WPL'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 (920) 459-6190.

Sincerely,

A handwritten signature in blue ink that reads "Eric Sandvig".

Eric Sandvig
Plant Manager

Enclosure

Cc: Bill Skalitzky
Jenna Wischmeyer

Attachment 1

Edgewater Generating Station Final Report Round 10 Dam Assessment Recommendations

Conclusions Section of Enclosure 1

Although the GZA Report listed a number of deficiencies to improve overall safety of the impoundments, the authors followed up by stating *“additional analysis was completed and provided to GZA after issuance of the DRAFT report that satisfies our recommendation. No further analysis is recommended at this time”*. Since the GZA inspection and prior to issuance of the Draft Report, WPL developed an Operations and Maintenance program (O&M Plan) for the site that incorporates guidance documents from four Federal Agencies and our Engineering Company (Hard Hat Services, formally Aether db). Contractors were brought on-site to perform the tree cutting and brush work to satisfy these deficiencies before the actual EPA Report was written.

Recurrent Operation & Maintenance Recommendations

“GZA recommends the following operation and maintenance level activities:”

- 1. Maintain grass cover on the upstream and downstream slope and approximately 15 feet beyond the toe area. USACE recommends vegetation be kept less than 12 inches in height on embankments.**

WPL will continue to follow the O&M plan developed for the site. All of the embankment slopes are vegetated with grass and all areas are mowed twice per year. If the inspections determine the vegetation requires cutting, a work order will be created to accomplish this work.

- 2. Remove trees from the upstream and downstream slopes.**

WPL will continue to follow the O&M plan developed for the site. All of the trees and brush have been removed from the embankments and downstream slope except for the toe area of C-Pond. This will be addressed by July 1, 2013.

- 3. Fill potholes, depressions, and animal burrows and reseed as necessary.**

WPL will continue to follow the O&M plan developed for the site. All potholes and depressions have been filled in with materials specified in the O&M Plan. All animal burrows have been filled in with concrete, as specified in the O&M Plan.

- 4. Exercise stoplogs/gates on an annual basis.**

Stop logs in the B-Pond are maintained to manage the water levels in the pond. This structure is part of the inspections specified in our O&M Plan.

Minor Repair Recommendations

“GZA recommends the following minor repairs which may improve the overall condition of the impoundments, but do not alter their current design:”

5. Repair the wave-action erosion along the upstream slope of the western embankment of Pond B

This erosional feature was repaired in 2012. Following our O&M Plan, a recent inspection revealed additional wave-action erosion features in the B and C Ponds. Although the C Pond was determined to be “out of scope” of the EPA CCR Assessment since it was classified as a “incised” pond, it is governed by our O&M Plan. The wave-action erosional features in these ponds will be repaired, per our O&M Plan, by July 1, 2013.

WPL will continue to follow the O&M plan developed for the site. All potholes and depressions have been filled in with materials specified in the O&M Plan. All animal burrows have been filled in with concrete, as specified in the O&M Plan.

Remedial Measures Recommendations

6. Determine location of pipes that discharge into Pond F. Generate plan for maintaining access for repair and evaluation

As per our O&M Plan, the vegetation along the F Pond was removed. This allowed the facility to determine where the underground pipe from the C Pond enters the pond. This area has been staked out to allow the facility to perform inspections outlined in the site O&M plan. Since F Pond is also WPDES Permit Outfall 004, the facility is required to operate and maintain a flow meter and a composite sampler on the discharge. In addition, the site WPDES permit requires weekly sampling, so plant personnel are at the discharge structure frequently. Past flows are compared and based on plant operations, it can easily be determined if there was some type of mechanical failure with the underground pipe. Since this site also maintains a Great Lakes Compact Agreement, daily water intake flows are maintained to verify intake and discharge values from our various outfalls.