

US EPA ARCHIVE DOCUMENT



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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 – Nelson Dewey 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 Nelson Dewey 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 (608) 725-2249.

Sincerely,

A handwritten signature in blue ink that reads "James Wamsley".

James Wamsley
Plant Manager

Enclosure

Cc: Bill Skalitzky
Jenna Wischmeyer

Attachment 1

Nelson Dewey 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 the third party Engineering Company WPL has contracted with to assist in this effort (Hard Hat Services, formally Aether dbs).

Recurrent Operation & Maintenance Recommendations

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

1. Repair sloughing on the downstream slope of the slag pond.

WPL will continue to follow the O&M plan developed for the site and the annual inspections performed by our third party engineer (Hard Hat Services, formally Aether dbs) on an annual basis. The area was repaired in August 2012 and will continue to be monitored and inspected as part of the site O&M plan.

2. Protect the northwestern embankment of the Slag Pond from wave action erosion.

WPL will continue to follow the O&M plan developed for the site and the annual inspections performed by our third party engineer (Hard Hat Services, formally Aether dbs) on an annual basis. The wave action erosion will be protected with rip/rapping or other suitable means as identified by our contractors. We are working with our contractors and expect this work to be completed by August 31, 2013.

3. Control burrowing animals on and near embankment.

WPL will continue to follow the O&M plan developed for the site. In addition to the site O&M plan; WPL has installed three (3) raptor perches within the slag pond and the closed landfill in an effort to control these burrowing animals. Along with our established peregrine falcon program, we believe these actions will help control the burrowing rodents within the closed landfill and slag pond. As in previous years, WPL will continue to contract with animal control companies to remove animals from the pond system.

4. Fill animal burrows.

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

Inspections performed by WPL employees and our third party engineers will continue to inspect for animal burrows. If burrows are discovered, a work order will be generated and the burrows will be filled in with the materials specified in the O&M plan.