

# Notification of Intent to Initiate Closure of the South CCR Surface Impoundment



**MidAmerican Energy Company,  
Walter Scott, Jr. Energy Center**

**Revision 0  
August 30, 2018**

# **Notification of Intent to Initiate Closure of the South CCR Surface Impoundment**

**Prepared for**

**MidAmerican Energy Company,  
Walter Scott, Jr. Energy Center  
Council Bluffs, Iowa**

**Revision 0  
August 30, 2018**

**Prepared by**

**Burns & McDonnell Engineering Company, Inc.  
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**MidAmerican Energy Company,  
Walter Scott, Jr. Energy Center  
Notification of Intent  
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### Certification

I hereby certify, as a Professional Engineer in the State of Iowa, that the information in this document was assembled under my direct personal charge. This report is not intended or represented to be suitable for reuse by the MidAmerican Energy Company, Walter Scott, Jr. Energy Center or others without specific verification or adaptation by the Engineer.



*Kira E. Wylam*

Kira E. Wylam, P.E.

Date: 8/30/2018

Kira E. Wylam  
License Number 23129

My license renewal date is December 31, 2018

Pages or sheets covered by this seal: As noted above.

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**LIST OF ABBREVIATIONS**

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
CCR	Coal Combustion Residual
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
MEC	MidAmerican Energy Company
South Impoundment	South CCR Surface Impoundment
RCRA	Resource Conservation and Recovery Act
U.S.C.	United States Code
WSEC	Walter Scott, Jr. Energy Center

## **1.0 SUMMARY OF OBJECTIVES**

On April 17, 2015, the Environmental Protection Agency (EPA) issued the final version of the Federal Coal Combustion Residual (CCR) Rule to regulate the disposal of coal combustion residual materials generated at coal-fired units. The rule will be administered as part of the Resource Conservation and Recovery Act [RCRA, 42 United States Code (U.S.C.) §6901 et seq.], using the Subtitle D approach.

The purpose of this document is to indicate the intent of MidAmerican Energy (MEC) to initiate closure of the existing South CCR Surface Impoundment (South Impoundment) at Walter Scott, Jr. Energy Center (WSEC). The intent to initiate closure of CCR surface impoundments is required under 40 CFR §257.102(g). The South Impoundment last received CCR and/or non-CCR wastewater on July 31, 2018.

The CCR Rule requires that this notification must include certification by a qualified professional engineer for the design of the final cover system as required by §257.102(d)(3)(iii), if applicable. As it is not yet determined if the South Impoundment will be closed in-place with a cover system, through removal, or a hybrid of the two, the design of a final cover system has not yet been confirmed. Therefore, the seal on this report certifies that the document's intent is for a final cover system to meet the requirements of §257.102(d).

## **2.0 GENERAL CONDITIONS**

The South Impoundment is located at the WSEC site, in Council Bluffs, Iowa. The South Impoundment is bordered by Pony Creek on the north and its respective levee. See Appendix A. Pony Creek runs into Mosquito Creek which feeds into the Missouri River. In the past, the South Impoundment received and stored wet sluiced CCR materials including bottom ash, economizer ash, and boiler slag from Unit 3, as well as Unit 4 cooling tower blowdown.

A railroad line runs through the South Impoundment, north to south, along the western edge. Prior to construction of the railroad, the active portion of the existing South Impoundment was 133 acres. The area that is currently utilized to store CCR materials is east of the railroad embankment and is approximately 120 acres in size.

### **3.0 CLOSURE PLAN**

The closure plan for the South Impoundment is currently in the process of being evaluated by MEC, and the final design has not yet been selected. The closure options include full closure by removal, full closure with material in-place, or a hybrid of the two previous closure options.

If closure by removal is selected for the closure of the South Impoundment, the design shall meet the requirements of 40 CFR §257.102(c). Furthermore, if closure with material in-place is selected for closure of the South Impoundment, the design shall meet the requirements of 40 CFR §257.102(d). If a hybrid option is selected, it shall meet the requirements of both aforementioned regulatory sections.



## **4.0 CLOSURE SCHEDULE**

Per 40 CFR §257.102(f) of the CCR Rule, the deadline to complete closure of a surface impoundment is five years after commencing closure activities. Therefore, Burns & McDonnell has developed a preliminary schedule based on a completion date of no later than July 31, 2023.

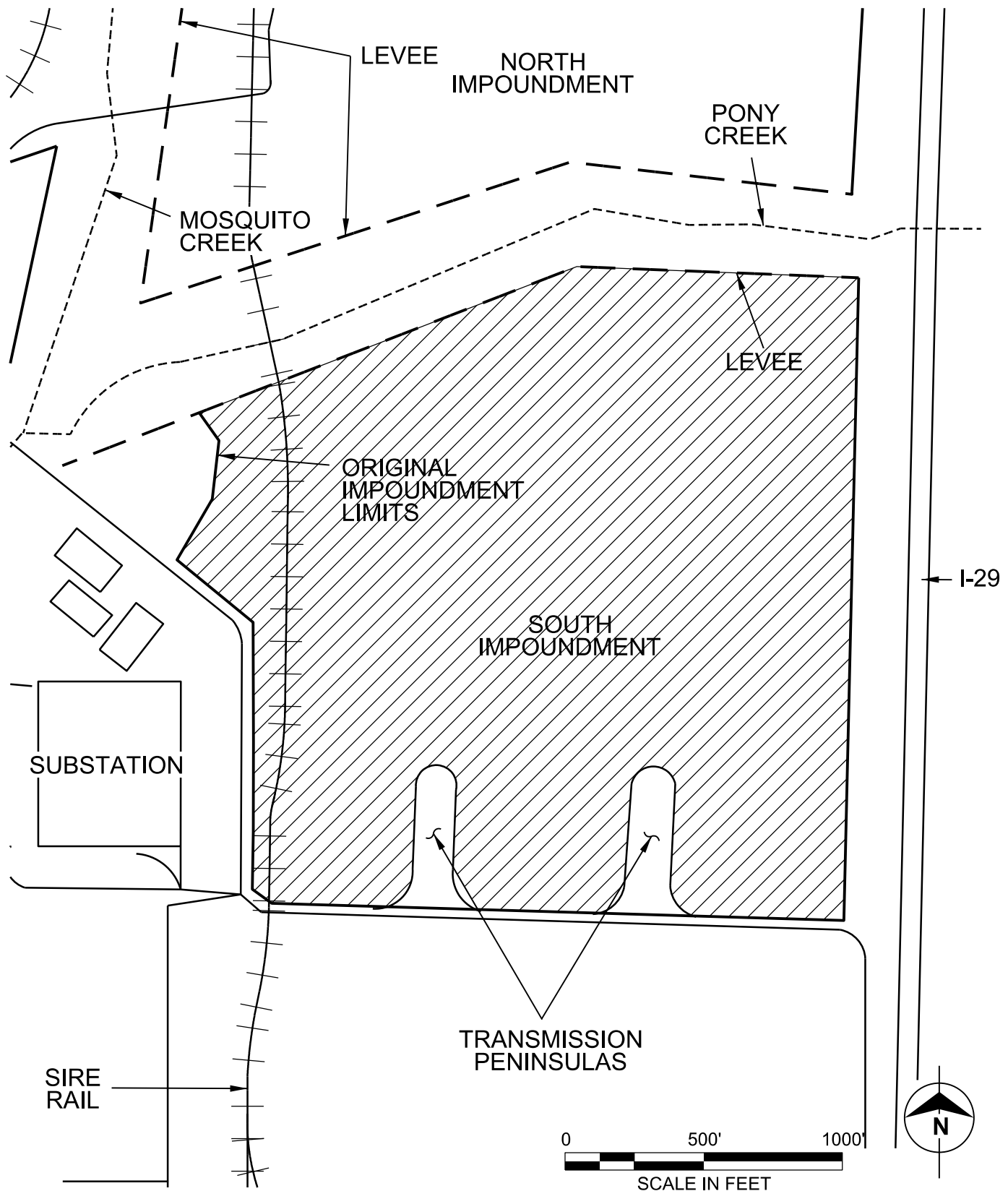
It is anticipated that unwatering and dewatering activities will occur in 2019, with closure construction activities starting in late 2019. Burns & McDonnell currently anticipates it is feasible to complete closure construction prior to 2023.

## **5.0 CLOSURE NOTIFICATION**

Closure documentation will include a notification of completion of closure document. This document should be completed within 30 days of the actual closure completion. Upon MEC's receipt, the closure notice shall be placed in MEC's Operating Record and sent to the Iowa Department of Natural Resources' Director. The closure notice shall be placed on MEC's CCR public website within 30 days of placing the document in the Operating Record.

## **APPENDIX A – SOUTH IMPOUNDMENT SITE PLAN**

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date **AUGUST 21, 2018**  
designed **K. WYLAM**

**MIDAMERICAN ENERGY COMPANY**  
**WALTER SCOTT**  
**SOUTH IMPOUNDMENT**  
**SITE PLAN**

project **85382**  
contract  
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