



Post-Closure Plan

**Alma Offsite Disposal Facility,
Phase IV Landfill
Alma, Wisconsin**

January 2024

Prepared For:

Dairyland Power Cooperative
3200 East Avenue South
La Crosse, Wisconsin 54601

Prepared By:

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A handwritten signature in blue ink that reads "BreAnne Kahnk".

BreAnne Kahnk, P.E.
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REVISION HISTORY

Revision Number	Revision Date	Section Revised	Summary of Revisions
01	01/12/2023	1-3	Updated text per WDNR regulations.
02	10/11/2023	2	Revised 2.3.5 to reference ch. NR 507



1.0 Introduction

This Post-Closure Care Plan (Plan) was prepared by TRC Environmental Corporation (TRC) on behalf of Dairyland Power Cooperative (DPC) for the Alma Offsite Disposal Facility, Phase IV Landfill (Landfill) where coal combustion residuals (CCR) are disposed. The approximately 32.1 acre Landfill is located in Sections 18 and 19, T21N, R12W, Town of Belvidere, Buffalo County, Wisconsin. DPC owns and operates the landfill in compliance with the Plan of Operation as permitted by the Wisconsin Department of Natural Resources (WDNR).

This Plan meets the post-closure (long-term) care requirements of the United States Environmental Protection Agency's (USEPA) CCR Rule, Title 40 Code of Federal Regulations (40 CFR) Parts 257 and 261 Subpart D - "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" and s. NR 506.084. Post-closure care requirements apply to the owners or operators of CCR landfills subject to closure criteria under 40 CFR 257.102. Because DPC plans to conduct closure of the Landfill through leaving the CCR material in-place, post-closure/long-term care requirements are necessary. Following closure of the CCR landfill (placement of final cover), the owner or operator shall begin to conduct long-term care for the Landfill in accordance with this Plan.

2.0 Post-Closure Care

2.1 Post-Closure Period

Following closure of the CCR landfill, the site owner is required to maintain and monitor the closed site for a minimum of 40 years. The post-closure period begins on the date identified in the notification of closure of the CCR unit as required by 40 CFR 257.102(h) and s. NR 506.084(1). Post-closure care will be provided to maintain integrity and effectiveness of the final cover system, the leachate collection system in accordance with 40 CFR 257.70(d), and groundwater monitoring system in accordance with 40 CFR 257.90 through 40 CFR 257.98. These goals are consistent with those detailed in s. NR 514.07(10)(d)(1)(b),(c), and (d).

2.2 Post-Closure Contact

The post-closure contact for this facility will be:

Manager, Water and Waste Programs
Dairyland Power Cooperative
3200 East Avenue South
La Crosse, WI 54601
Phone: 608-787-1311
ccrinfodesk@dairylandpower.com

2.3 Inspection, Monitoring and Maintenance

The site will be inspected annually during the post-closure care period. The Landfill post-closure/long-term monitoring program was initially outlined in the 2000 Plan of Operation. A written record of the inspection(s) will be made and retained in the operating record. The inspector will assess the condition and need for repair of the final cover, vegetation, monitoring points, and storm water control features.

Minor repairs may be required to maintain the integrity and functionality of the drainage structures, roads, monitoring points, etc. Repairs will be made as warranted.

2.3.1 Final Cover Maintenance

Because the CCR is handled dry, moisture conditioned, and compacted in the Landfill, settlement of the final cover system is not anticipated. However, erosion may require minor final cover repairs. Areas of the final cover where ponding or erosion are observed will be repaired to maintain the integrity of the final cover system. Minor repairs may be required to maintain the integrity and functionality of the drainage structures, storm water controls, roads, monitoring points, etc.

2.3.2 Vegetation Maintenance

During inspections, areas lacking vegetation where it is required will be noted. Reworked surfaces, areas of failed or eroded vegetation, and repaired surfaces will be revegetated appropriately. Vegetation maintenance includes mowing. Mowing will be conducted as needed or on a semi-annual basis, whichever is more frequent. Mowing is not required where native prairie grass vegetative cover has been installed as previously approved by the WDNR.

2.3.3 Storm Water Runoff Management System Maintenance

Erosion controls and avoiding ponding of water are addressed by the design, grading, construction, and establishing vegetation on the landfill final cover to ensure proper run-on and run-off of storm water. During site inspections, diversion berms, perimeter dikes, roads, slopes, and storm water sedimentation basins will be inspected for erosion, seeps, depressions, obstructions to flow, vegetation cover, and other maintenance concerns. Maintenance associated with sediment accumulations and erosion will be performed as needed.

2.3.4 Leachate Collection System Maintenance and Monitoring

The leachate collection system will be maintained as needed during the post-closure care period. Features of the system that will be inspected annually include manholes, surface features, transfer piping, controls, the storage tank, and leachate collection volumes. Leachate lines will be cleaned and televised on an annual basis at a minimum. Miscellaneous repairs will be performed on an as-needed basis. The leachate storage tank will be replaced as necessary.

The leachate monitoring program will continue to be conducted during the post-closure period. At a minimum, leachate sampling from the storage tank will occur on a bi-annual basis and leachate head wells will be recorded annually, as presented in the 2000 Plan of Operation and the Environmental Sampling Plan.

Leachate collected in the leachate collection tanks will be utilized on-site for approved activities or hauled to the DPC wastewater treatment plant (WWTP), located in Alma, Wisconsin or the La Crosse Waste Water Utility WWTP location in La Crosse, Wisconsin for treatment and disposal. Miscellaneous repairs will be performed on an as-needed basis to maintain the integrity and effectiveness of the system.

2.3.5 Groundwater Monitoring Well Maintenance and Monitoring

The groundwater monitoring system will be maintained and monitored per ch. NR 507 throughout the post-closure care period. Groundwater monitoring wells will be sampled as outlined in the Environmental Sampling Plan during the post-closure care period. Results associated with CCR wells will be presented in the annual Groundwater Monitoring and Corrective Action Report submitted to the WDNR and posted to the publicly accessible website. The remainder of the results will be submitted to the WDNR as required. Groundwater monitoring records will be maintained in the operating record.

Sampling procedures and the groundwater monitoring program, as described in the Environmental Sampling Plan, will be followed throughout the post-closure care period. The parameters, frequency, and monitoring locations are summarized within the Environmental Sampling Plan.

If adverse trends develop, then the WDNR will be notified and further evaluation will be performed. If corrective action becomes necessary, then a plan will be developed and submitted to the WDNR for approval.

2.4 Post-Closure Uses

After the Landfill is closed, the site will be secured and maintained by the owner as open green space and recreation. These uses do not conflict with long-term care plans for the area. The final use is intended to prohibit agricultural uses, building construction, and excavation of the final cover or CCR. These uses are protective of the final cover system and do not increase the potential threat to human health or the environment.

2.5 Post-Closure Care Termination

Post-closure care termination may be considered after a period of 40 years from the notification of closure. In the event that the Landfill is operating under assessment groundwater monitoring in accordance with 40 CFR 257.95, the Owner will continue to perform post-closure care and groundwater monitoring in accordance with 40 CFR 257.95 until the Landfill returns to detection monitoring.

No later than 60 days following completion of the post-closure care period, the owner or operator of the CCR landfill shall post the notification of completion of post-closure care period to the operating record in accordance with 40 CFR 257.104(e) and s. NR 506.084(2)(b). Section 3 provides details on notification requirements.

2.6 Revision of the Post-Closure Plan

This Post-Closure Plan should be amended and submitted to the WDNR at least 60 days prior to a planned change that will substantially affect this plan or within 60 days of an unanticipated event after post-closure activities have commenced. If the Post-Closure Care Plan is revised after long-term care activities have commenced, the owner or operator shall submit the modification request to the WDNR no later than 30 days following the triggering event. Modifications to the Post-Closure Care Plan shall be completed in accordance with s. NR 514.04(6).

3.0 Notifications

3.1 Operating Record

The following items will be maintained in the operating record for a minimum of five years:

- 40 CFR 257.105(h): applicable requirements for groundwater monitoring
- 40 CFR 257.105(i)(12): the current post-closure plan and any amendment of the plan; the current version of the post-closure plan will be maintained in the facility's operating record irrespective of time,
- 40 CFR 257.105(i)(13): the notification of completing post-closure care
- Inspection reports

3.2 Notification Requirements

The following required notifications will be provided before the close of business on the day the notification is required to be completed:

- 40 CFR 257.106(h): *applicable* requirements for groundwater monitoring
- 40 CFR 257.106(i)(12): the availability of the written post-closure plan and any amendment of the plan
- 40 CFR 257.106(i)(13): the availability of completion of post-closure care

3.3 Publicly Accessible Internet Site

The following required items will be posted on the publicly accessible internet site:

- 40 CFR 257.107(h): *applicable* requirements for groundwater monitoring
- 40 CFR 257.107(i)(12): the written post-closure plan and any amendment of the plan
- 40 CFR 257.107(i)(13): the notification of completion of post-closure care

Information should be posted within 30 days of placing the pertinent information in the operating record. Records will be made available to the public for at least five years following the date on which the information was posted on the internet site.

4.0 Engineer's Certification

Pursuant to 40 CFR 257.104 and by means of this certification I attest that:

- (i) I am familiar with the requirements of the federal CCR rule (40 CFR 257);
- (ii) this Post-Closure Plan has been prepared in accordance with good engineering practice; and
- (iii) this Post-Closure Plan meets the requirements of 40 CFR 257.104(d).

For the purpose of this document, "certify" and "certification" shall be interpreted and construed to be a "statement of professional opinion." The certification is understood and intended to be an expression of my professional opinion as a Wisconsin licensed professional engineer, based upon knowledge, information, and belief. The statement(s) of professional opinion are not and shall not be interpreted or construed to be a guarantee or a warranty of the analysis herein.



Signature of Registered Professional Engineer

Registration No. E-46825 State: Wisconsin

