

R. SERIES/Initials CON 10-11 C.A.R.
FACILITY ID 64-01-012
WK ACT/Doc Code CP / GC
Project # / Permit # 07-602 /

02/06/08

Storage of Transmission Line Material

**Pre-Public Comment Correspondence
Regarding the Storage of Transmission
Line Material**



R. SERIES / Initials _____
FACILITY ID _____
WK ACT / Doc Code _____

STATE OF IOWA

CHESTER J. CULVER, GOVERNOR
PATTY JUDGE, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
RICHARD A. LEOPOLD, DIRECTOR

70053110000006005161

February 6, 2008

CERTIFIED MAIL

Alan J. Arnold
Interstate Power and Light Co.
Alliant Tower
200 First Street SE
PO Box 351
Cedar Rapids, IA 52406-0351

Re: Plant Number 64-01-012, Project Number 07-602, Allowance of Temporary Storage of Transmission Line Material.

Dear Mr. Arnold:

The Department has reviewed your letter of February 1, 2008 concerning the storage of materials for rebuilding and relocating a number of high-voltage transmission lines at the Sutherland Generating Station. According to the information supplied the materials will include wood poles, conductor reels, crates of insulators, bundles of anchors, and boxes of miscellaneous hardware. The storage of these materials will be temporary in nature.

The question of what type of construction activities may be conducted prior to the issuance of a Prevention of Significant (PSD) permit has been covered by an EPA policy since 1978. On December 18, 1978 EPA issued a memorandum specifying activities such as planning, ordering of equipment & material, site clearing, grading, and on-site storage of equipment & materials could occur prior to the issuance of a PSD permit. Any activities undertaken prior to issuance of a PSD permit would be solely at the owner's or operator's own risk with no guarantee of a PSD permit being issued. This same memo stated

"All on-site activities of a permanent nature aimed at completing a PSD source for which a permit has yet to be obtained are prohibited under all circumstances. These prohibited activities include installation of building supports and foundation, paving, laying of underground pipe work, construction of permanent storage structures, and activities of a similar nature."

Since the storage of these materials is temporary and the materials will not be used for the construction of the boiler or its ancillary equipment at the facility the Department is allowing Interstate Power and Light to go ahead and store the materials. If you have any questions, feel free to contact me by phone at (515) 242-6002 or by email at chris.roling@dnr.iowa.gov.

Sincerely,

Christopher A. Roling, PE
Environmental Engineer Senior
Air Quality Bureau, IDNR

C: Bob Webber, EPA Region VII
Field Office 5

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

ALAN J ARNOLD
INTERSTATE PWR & LIGHT CO
200 FIRST ST SE
PO BOX 351
CEDAR RAPIDS IA 52406-0351

2. Article Number
(Transfer from service label)

PS Form 3811, February 2004

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 [Signature] Agent
 Addressee

B. Received by (Printed Name) Date of Delivery
FEB 11 2004

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7005 3110 0000 0600 5161

Domestic Return Receipt

Rolling

102595-02-M-1540

Roling, Chris [DNR]

From: Roling, Chris [DNR]
Sent: Friday, February 08, 2008 1:35 PM
To: AlanArnold@alliantenergy.com
Subject: transmission line letter
Contacts: AlanArnold@alliantenergy.com
Attachments: transmission line.doc

Alan,

Here is a copy of the letter.

Chris

Christopher A. Roling, PE
Environmental Engineer Senior
Air Quality Bureau, IDNR
ph: 515-242-6002
fax: 515-242-5094



STATE OF IOWA

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"All on-site activities of a permanent nature aimed at completing a PSD source for which a permit has yet to be obtained are prohibited under all circumstances. These prohibited activities include installation of building supports and foundation, paving, laying of underground pipe work, construction of permanent storage structures, and activities of a similar nature."

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Sincerely,

A handwritten signature in cursive script that reads "Christopher A. Roling".

Christopher A. Roling, PE
Environmental Engineer Senior
Air Quality Bureau, IDNR

C: Bob Webber, EPA Region VII
Field Office 5



Interstate Power and Light Co.
An Alliant Energy Company

200 First Street SE
P.O. Box 351
Cedar Rapids, IA 52406-0351

Office: 1.800.822.4348
www.alliantenergy.com

February 1, 2008

Mr. Dave Phelps
Construction Permitting Supervisor
Air Quality Bureau, Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Subject: Request for Transmission Line Material Storage Prior to Air Permit Issuance

Dear Mr. Phelps:


Interstate Power and Light Company (IPL) desires to temporarily store transmission line material at the site of the proposed Sutherland Generating Station (SGS) Unit 4 in Marshalltown, Iowa. The purpose of the material storage is to facilitate rebuilding and relocating a number of high-voltage transmission lines on the site.

The material to be stored will include wood poles, conductor reels, crates of insulators, bundles of anchors, and boxes of miscellaneous hardware. Some temporary rock drives will be installed to allow reasonable truck access to the material, and the total area of the storage will be slightly less than 1 acre. This site will be very close to the existing Interstate Power and Light Company Training Center buildings, near which a number of spring 2007 ice storm materials have been stored for the past year. Once the transmission lines are complete, the remaining material will return to Alliant warehouses and the rock will be removed.

IPL would like to confirm through written response from the Iowa Department of Natural Resources Air Quality Bureau that temporarily storing this transmission line material is allowable in advance of issuance of the air permit for the SGS4 project. As noted above, the purpose of this material storage is to facilitate rebuilding and relocating a number of transmission lines on the site. As such, this effort is not designed to trigger "initiation of construction" prior to issuance of the air permit for the new unit.

If you need additional information regarding the material storage, please contact me at 319-786-4476 or at alanarnold@alliantenergy.com. We would like to begin storing material at the site in a few weeks, and maintain some storage through approximately December of 2008. A response at your earliest convenience would be greatly appreciated.

Respectfully,


Alan J. Arnold
Senior Environmental Specialist
Interstate Power and Light Company

Cc: Jeff Beer, IPL Project Director
Marlon Vogt, Special Projects Manager
Kevin Fleming, IPL Project Construction Director

RECEIVED

FEB 04 2008

Roling, Chris [DNR]

From: Arnold, Alan [AlanArnold@alliantenergy.com]
Sent: Friday, February 01, 2008 12:47 PM
To: Roling, Chris [DNR]
Cc: Daniel, Chad
Subject: FW: Attached Image from Alliant Energy
Attachments: 3646_001.pdf

Chris- hope things are going well with you. I wanted to provide you an electronic copy of a letter we are sending to Dave's attention today regarding the request for a temporary storage laydown area associated with SGS Unit 4. Please feel free to contact me if you have questions.

Regards- Alan

Alan J. Arnold

Environmental Lead- IPL Baseload Project
Alliant Energy Corporate Services
P.O. Box 351
200 First Street S.E., GO-13th Floor
Cedar Rapids, IA 52406 (52401)
Phone: 319.786.4476
Fax: 319.786.4747



Please consider the environment before printing my e-mail

Please note that the information and attachments in this email are intended for the exclusive use of the addressee and may contain confidential or privileged information. If you are not the intended recipient, please do not forward, copy or print the message or its attachments. Notify me at the above address, and delete this message and any attachments. Thank you.

From: AlliantEnergyScanner@alliantenergy.com [mailto:AlliantEnergyScanner@alliantenergy.com]
Sent: Friday, February 01, 2008 11:23 AM
To: Arnold, Alan
Subject: Attached Image from Alliant Energy



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Respectfully,

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Alan J. Arnold
Senior Environmental Specialist
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Marlon Vogt, Special Projects Manager
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