

Closure Plan

Nelsen Pond

Otter Tail Power Company - Coyote Station

Introduction

This Closure Plan (Plan) has been written for the Coyote Station Nelsen Pond in accordance with 40 CFR 257. This Plan outlines the requirements, procedures and schedule for clean closure of Nelsen Pond.

Nelsen Pond is used to temporarily store and dewater CCR that has been hydraulically dredged from the Slag Pond. Once dewatered, the CCR is hauled to the Blue Pit for disposal.

Nelsen Pond is included in a combined groundwater monitoring network that encompasses the Sluice Outfall and the Slag Pond CCR units. This plan details closure of Nelsen Pond only. Closure of the Slag Pond and Sluice Outfall are addressed in separate plans.

CLOSURE PROCEDURES § 257.102(b)(1)(i)-(ii)

Nelsen Pond will be closed using clean closure techniques in accordance with § 257.102(c). CCR will be removed from Nelsen Pond using common earthmoving equipment and will be beneficially used or disposed of in the Blue Pit.

A qualified third-party will visually inspect Nelsen Pond to ensure all CCR has been removed. Groundwater monitoring will continue until constituent concentrations throughout the CCR unit or any areas affected by releases of CCR are below the groundwater protection standard established by §257.95(h) and constituents listed in appendix IV to Part 257. At that point closure of Nelsen Pond will be deemed complete.

QUANTITY OF ASH § 257.102(b)(1)(iv)-(v)

CCR is temporarily stored in Nelsen Pond for dewatering. Approximately 17,000 cubic yards of CCR is the maximum volume stored at one time in the unit. The Nelsen Pond footprint is approximately 5 acres and the entire area will be subject to closure requirements.

CLOSURE SCHEDULE § 257.102(b)(1)(vi)

Modifications to plant operations in 2019 will create a change of use at Nelsen Pond. Due to the change, CCR will no longer be placed in Nelsen Pond.

The owner or operator of the CCR unit will commence closure activities no later than 30 days after the last known receipt of waste or removing the last amount of CCR from the unit for beneficial use in accordance with §257.102(e)(1)(i). Nelsen Pond will be closed by removal of CCR in accordance with §257.102(c).

NOTIFICATION OF CLOSURE § 257.102(g)

A notification of the intent (NOI) will be placed in the facility's operating record and CCR website as required by § 257.107(i). The estimated timeframe for closure of Nelsen Pond is presented in Figure 1 and is subject to change.

CERTIFICATION OF FINAL CLOSURE § 257.102(h)

Upon completion of closure activities, a documentation report will be prepared that states the unit has been closed in accordance with §257.102(c) and §257.107(i). The report will be signed by an authorized officer of Otter Tail Power Company and a professional engineer licensed in North Dakota, then placed in the facility's operating record and posted to the CCR website within 30 days of completion of closure. The report will contain record drawings, testing data and a description of the construction process with photographs.

DEED NOTATION § 257.102(i)(4)


A deed notation is not required as the unit will be closed by removal.

AMENDMENT OF CLOSURE PLAN § 257.102(b)(3)

If any event or change affects the plan, a modified Closure Plan will be prepared and placed in the facility's operating record and posted on the CCR website. This applies to any change in the Operations and Maintenance Plan, facility design, or estimated year of closure. At a minimum, the Closure Plan will be reviewed and updated, if necessary, every five years beginning with this version of the Closure Plan.

CERTIFICATION § 257.102(b)(4)

I hereby certify under penalty of law that this report was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Daniel J. Riggs, PE
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October 30, 2018
Date

Figure 1 – NELSEN POND CLOSURE SCHEDULE

