

Closure Plan Slag Pond Otter Tail Power Company - Coyote Station

Introduction

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

The Slag Pond is an unlined, incised, CCR surface impoundment and is included in a combined groundwater monitoring network that encompasses the Nelsen Pond and Sluice Outfall CCR units. This plan details closure of the Slag Pond only. Closure of the Nelsen Pond and the Sluice Outfall units are presented in separate plans.

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

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

A qualified third party will visually inspect the Slag Pond to ensure all CCR has been removed. Groundwater monitoring will continue until constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit are below the groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV to Part 257. At that point closure of the Slag Pond will be deemed complete. Following closure, the Slag Pond will be used for non-CCR activities such as stormwater runoff control.

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

The Slag Pond is periodically excavated to restore capacity. Approximately 15,000 cubic yards of CCR is the maximum volume stored at one time in the unit. The Slag Pond is approximately 6.5 acres and the entire area will be subject to closure requirements.

CLOSURE SCHEDULE § 257.102(b)(1)(vi)

Modifications to plant operations in 2019 create a change of use at the Slag Pond. Due to the change, CCR sluicing to the Slag Pond will cease after the modifications are complete.

The owner or operator 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). The Slag Pond will be closed by removal of CCR in accordance with §257.102(c) Closure

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by removal of CCR. Completion of closure activities will occur as specified in §257.102(f)(i). See Figure 1 for more details of closure.

NOTIFICATION OF CLOSURE § 257.102(g)

A notification of 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 the Slag 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 stated 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 facilities operating record and posted on 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, an amended 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.

October 30, 2018

Daniel J. Riggs, PE

License No. PE-10912

Date

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FIGURE 1 – SLAG POND CLOSURE SCHEDULE

