



## Initial Hazard Potential Classification Assessment

### Nelsen Pond

Otter Tail Power Company – Coyote Station

### Introduction

This report presents documentation and certification for hazard potential classification assessment for the Nelsen Pond at Coyote Station in Beulah, North Dakota. The Nelsen Pond is an “existing” coal combustion residual (CCR) surface impoundment. This document addresses the requirements of 40 CFR §257.73(a)(2).

Nelsen Pond is used to 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. The Nelsen Pond contains CCR or slurry for a period of 2 or 3 months every 3 years.

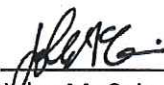
### Assessment

CCR dredged in to the Nelsen Pond is generally coarse in nature and settles out quickly, reducing the amount of solids capable of flowing during the loss of containment. In addition, the Nelsen Pond features a bottom drain system that continuously drains free water reducing the spill volume present at any given time.

Based on the Federal Guidelines for Dam Safety, Hazard Potential Classification System for Dams, the Nelsen Pond is determined to be a low hazard surface impoundment. If the Nelsen Pond were to fail it would result in no probable loss of human life and would result in minor environmental damage, principally limited to the owner’s property.

### Certification

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.

  
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John McCain, PE  
License No. PE-4345

October 17, 2016  
Date