

Memorandum

To: Paul Vukonich, Principal, Environmental Services
From: Paul Swenson
Subject: Otter Tail Power Company, Coyote Station, Nelsen Pond, Sluice Outfall, and Slag Pond, Notification of Closure
Date: November 22, 2019
Project: 34291075

Otter Tail Power Company (OTP) undertook closure by removal activities in 2019 to close Nelsen Pond, Sluice Outfall, and the Slag Pond (collectively referred to as the Slag Pond Area) at Coyote Station near Beulah, North Dakota, in accordance with 40 CFR Part 257, Disposal of Coal Combustion Residuals from Electric Utilities, § 257.102 (c). These facilities are defined as coal combustion residual (CCR) surface impoundments under 40 CFR Part 257. Closure by removal construction activities were documented in:

- Closure Construction Documentation Report, Nelsen Pond, prepared by Barr Engineering Co. (Barr) in November 2019
- Closure Construction Documentation Report, Sluice Outfall, prepared by Barr in November 2019
- Closure Construction Documentation Report, Slag Pond, prepared by Barr in November 2019

Closure construction for the three CCR surface impoundments was conducted in accordance with:

- Closure Plan, Nelsen Pond, prepared by Carlson McCain in October 2018
- Closure Plan, Sluice Outfall, prepared by Carlson McCain in October 2018
- Closure Plan, Slag Pond, prepared by Carlson McCain in October 2018

The three CCR surface impoundments are monitored by a single multi-unit groundwater monitoring system. Groundwater samples were collected from the groundwater monitoring system and analyzed after completion of closure construction activities. Assessment of groundwater sampling results completed on November 18, 2019, demonstrates that groundwater concentrations do not exceed the groundwater protection standard established pursuant to § 257.95(h) for constituents listed in Appendix IV to 40 FCR Part 257. Therefore, it is determined that Nelsen Pond, Sluice Outfall, and the Slag Pond have been closed in accordance with the requirements of 40 CFR § 257.102, closure by removal of CCR procedures established in paragraph (c).

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I hereby certify that closure of Nelsen Pond, Sluice Outfall, and the Slag Pond at Otter Tail Power Company's Coyote Station has been completed in accordance with the closure plan specified in paragraph 40 CFR § 257.102 (b) and the requirements of 40 CFR § 257.102 (c), and that I am a duly licensed professional engineer under the laws of the State of North Dakota.

Paul T. Swenson, P.E.
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