



Closure Plan for Existing CCR Units

Scrubber Ponds

Lewis and Clark Station

Prepared for
Montana-Dakota Utilities Co.

Amendment 1, February 2022

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Certification

I hereby certify that this Closure Plan for the Scrubber Ponds at the Lewis & Clark Station owned by Montana-Dakota Utilities Co., and located near Sidney, Montana, meets the requirements of the Coal Combustion Residuals Rule 40 CFR 257 Subpart D and the requirements of 40 CFR §257.102(b).

Amendment	Date	Summary of Changes
0	October 17, 2016	Initial Plan
1	February 2, 2022	Updates to reflect closure by removal of CCR

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Dated this 2nd day of February, 2022

1.0 Introduction

Montana-Dakota Utilities Co. (MDU) operates Lewis & Clark Station (Lewis & Clark), a coal-fired steam-electric generating plant that produces coal combustion residuals (CCR) as a by-product of generation of electricity, near Sidney, Montana. CCR management at Lewis & Clark is subject to the requirements of 40 CFR 257 Subpart D, Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (CCR Rule).

The Scrubber Ponds comprise a multi-unit, single CCR unit under the definition of an existing CCR surface impoundment. It receives sluiced flue-gas desulfurization sludge and some fly ash material and is thus subject to the CCR Rule.

The Closure Plan for Existing CCR Units (Barr, 2016) was prepared in 2016 to describe the planned closure of the Temporary Storage Pad (TSP, a CCR pile) and the East and West Scrubber Ponds, collectively referred to as the Scrubber Ponds, a multi-unit, CCR unit. The plan met the requirements of 40 CFR §257.102(b), written closure plan for CCR landfill and surface impoundments, as they applied to the TSP and the Scrubber Ponds. The TSP was closed in 2020. The 2016 Closure Plan included closure of the Scrubber Ponds with CCR in place. The Scrubber Ponds will now be closed by removal of CCR (40 CFR §257.102(c)). This amended plan documents the revised approach to closure of the Scrubber Ponds and removes provisions for closure of the TSP.

2.0 Closure Plan, 40 CFR §257.102(b)

2.1 Method of Closure, 40 CFR § 257.102(b)(1)(i)-(ii)

Closure of the Scrubber Ponds will be accomplished through removal of CCR and decontamination in accordance with 40 CFR §257.102(c). Freestanding liquids will be removed and disposed of in accordance with all applicable local, state, and federal laws, and the Montana Pollutant Discharge Elimination System Permit for the site. CCR materials will be removed by a qualified earthwork contractor and disposed of in an off-site permanent disposal facility.

Visual inspections will be conducted to verify that CCR and liner materials and have been removed from the site. Groundwater quality monitoring will continue after closure construction activities. Closure of the Scrubber Ponds will be complete when constituent concentrations within the CCR groundwater monitoring system do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in Appendix IV of the CCR Rule.

2.2 CCR Inventory and Area, 40 CFR § 257.102(b)(1)(iv)-(v)

The combined Scrubber Ponds can contain a maximum of approximately 40,000 cubic yards of CCR; however, much of the CCR will be removed prior to commencing closure. The Scrubber Ponds have been drained and CCR removed and placed in an off-site permanent disposal facility on a semi-annual basis during plant operation. The West Scrubber Pond has an area of approximately 2.0 acres, and the East Scrubber Pond has an area of approximately 2.3 acres. The total area of the CCR units to be closed is approximately 4.3 acres.

2.3 Closure Schedule, 40 CFR § 257.102(b)(1)(vi)

The estimated closure date and schedule is summarized in Table 2-1. The milestones and the associated timeframes are initial estimates and may change as closure design and construction bidding is completed.

Table 2-1 Closure Schedule

Closure Milestone	Estimated Year
Final receipt of ash	2021
Prepare notification of intent to close the CCR Units	2021 (prior to initiating closure)
Removal of CCR materials and decontamination	2022
Prepare construction documentation report for CCR Units closure	2022
Prepare notification of closure of the CCR Units	2023 (within 30 days of closure completion as demonstrated by meeting GWPS)