2015 Annual Landfill Inspection

R.M. Heskett Station Coal Ash Landfill

Prepared for Montana-Dakota Utilities Company

December 2015



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Certifications

I hereby certify that I have examined the facility and, being familiar with the provisions of 40 CFR 257 Subp. D, attest that this Annual Landfill Inspection report has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR §257.84.

OFESS Huler Seth w Hueckma EGIS PE-10057

Seth W. Hueckman Barr Engineering Co. ND Registration Number PE-10057

Dated this 30th day of December, 2015

1.0 Introduction

Montana-Dakota Utilities Co. (MDU) operates the R.M. Heskett Station (Heskett), in Mandan, North Dakota. MDU operates two coal-fired boilers at Heskett, resulting in production of coal combustion residuals (CCR). CCR management is subject to Federal Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments per 40 CFR 257 Subpart D (CCR Rule). MDU currently hauls dry CCR material from the Heskett plant to the on-site landfill. Under 40 CFR §257.84, CCR landfills are subject to annual inspections by a qualified professional engineer (QPE). This report documents the first annual landfill inspection performed by Thomas J. Radue, P.E. and Seth W. Hueckman, P.E. on September 15th, 2015, as required by the CCR Rule. Other annual inspection duties, including a review of the available information regarding the status and condition of the CCR unit and storage capacity evaluations, were performed prior and following the on-site inspection.

2.0 Review of Existing Information

A review of existing information was performed to confirm that the design, construction, operation and maintenance of the landfill is consistent with recognized and generally accepted good engineering standards. No deficiencies were found and the existing information reviewed is described in following subsections.

2.1 Results of Weekly Inspections

MDU commenced weekly landfill inspections by a qualified person on October 16, 2015, prior to the October 19, 2015 effective date of the CCR Rule. Weekly inspection reports from October 16, 2015 through November 28, 2015 were reviewed as part of this annual inspection.

2.2 **Results of Previous Annual Inspections**

This report presents conclusions from the first annual inspection as required by the CCR Rule and therefore, results of previous annual inspections are not available.

3.0 Structural Integrity and Operational Review

An on-site inspection was performed to visually identify signs of distress or malfunction of the landfill. Inspection consisted of on-foot inspection of perimeter embankments, the active landfill face, final covered areas, and the evaporation pond. Visual inspection items and results are summarized in the following table:

		Visibly Observed		
Item	Visual Inspection Description	(Yes/No)	Notes	
1	Proper placement of waste	Yes – Except as Noted	1" dia. (+) agglomerated fluidized bed material visible near exposed geomembrane liner system. Visibly check loads of fluidized bed material for agglomerated particles and when agglomerated particles are present, preferentially place load within landfill to avoid direct placement on geomembrane liner.	
2	Adequate slope stability and erosion control	Yes	No significant erosion identified	
3	Run-on and Run-off controls properly functioning	Yes	Surface water controls appeared adequate	
4	Surface water percolation minimized	Yes	No surface water ponding or excessive leachate generation observed	
5	Liner systems properly operated and maintained	Yes	No liner systems issues	
6	Leachate collection systems properly operated and maintained	Yes – Except as Noted	Leachate collection discharge pipe outlet obstructed and covered with sediment on southwest corner of evaporation pond. Corrected by MDU via removal of sediment from end of pipe.	
7	Water quality monitoring systems maintained and operating	Yes	Existing monitoring wells were accessible and appeared to be in good condition	
8	Dust adequately controlled	Yes	No dust issues present at time of inspection	
9	Landfill geometry consistent with facility plan	Yes	No geometry changes observed	
10	Animal burrows absent or of no significance	Yes	No burrows of significance identified	
11	Adequate vegetation density and vegetation maintenance	Yes	Vegetation appeared well established and well maintained	
12	Debris controlled or absent	Yes	No debris present	

Table 3-1 Summary of Visual Inspection

No changes to the landfill design, maintenance, or operations were observed that could affect the stability or operation of the landfill.

4.0 Volume of CCR Contained

A topographic survey of the landfill was performed in September 2015 to calculate volumes of CCR contained in the CCR unit and capacity remaining. The following table summarizes the volume of CCR contained in the landfill.

Slot/Cell	Approximate Permitted Design CCR Capacity (cy)	Current CCR Capacity Consumed (cy)	Approximate Remaining CCR Capacity (cy)	Status of Slot/Cell
Slots 1-5	700k	700k	0	Closed
Slots 6-10	1,150k	840k	310k	Slots 6 & 7 Closed, Slot 8 Partially Closed, Slots 9 & 10 Active
Cells 1-8	1,420k	0	1,420k	Not Yet Constructed

Table 4-1 Volume of CCR Contained in Landfill