

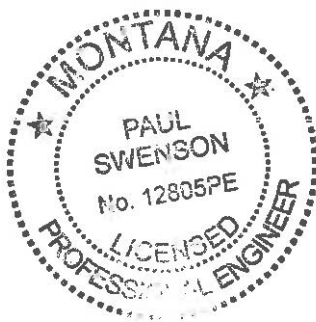
Memorandum

To: Todd Peterson, Montana-Dakota Utilities Co.
From: Paul Swenson
Subject: Lewis & Clark Station, Temporary Storage Pad Closure Certification
Date: November 13, 2020
Project: 26411007

Montana-Dakota Utilities Co. (MDU) undertook construction activities in 2018 to remove coal combustion residuals (CCR) from the Temporary Storage Pad (TSP) at its Lewis & Clark Station near Sidney, Montana. Closure by removal construction activities were documented in the Construction Documentation Report, CCR Temporary Storage Pad Closure, prepared by Barr Engineering Co. (Barr) in November 2018.

Groundwater samples were collected and analyzed after completion of closure construction activities. A statistically significant increase (SSI) over background levels was determined for one or more of the constituents listed in appendix III to the CCR Rule (§257.95(a)) in 2018, which resulted in initiation of an assessment monitoring program on April 15, 2018, that continued through 2020.

An Alternative Source Demonstration (ASD) was prepared in 2020 that showed a source other than the CCR unit caused the SSI, consistent with requirements of §257.95(g)(3)(ii) of the CCR Rule. Therefore, it is determined that the TSP has been closed in accordance with the requirements of 40 CFR § 257.102 (c), Closure by removal of CCR.

A handwritten signature in blue ink, appearing to read "Paul Swenson", written in a cursive style.

I hereby certify that closure of the Temporary Storage Pad at Montana-Dakota Utilities Co.'s Lewis & Clark Station has been completed in accordance with the closure plan prepared in accordance with 40 CFR § 257.102 (b) and the closure requirements of 40 CFR § 257.102 (c).