



Post-Closure Care Plan for Existing CCR Units

East and West Scrubber Ponds

Lewis and Clark Station

Prepared for
Montana-Dakota Utilities Co.

October 2016

A handwritten signature in black ink, appearing to read "Paul G. Swann".

Coal Combustion Residuals Post-Closure Care Plan

October 2016

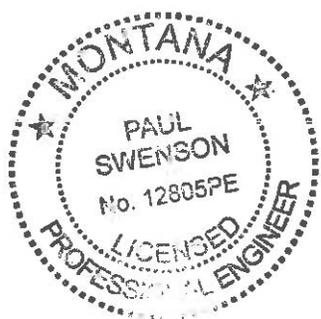
Contents

| | | |
|-----|---|---|
| 1.0 | Introduction | 1 |
| 2.0 | Monitoring and Maintenance Activities | 2 |
| 2.1 | Inspection | 2 |
| 2.2 | Maintenance | 2 |
| 2.3 | Groundwater Monitoring..... | 2 |
| 3.0 | Contact Information | 3 |
| 4.0 | Planned Use of Property | 4 |

Certifications

I hereby certify that this Post Closure Plan for the existing CCR Units, Temporary CCR Storage Pad and the East and West Scrubber Ponds, at the Lewis & Clark Station meets the requirements of the Coal Combustion Residuals Rule 40 CFR 257 Subpart D. and the requirements of 40 CFR §257.104(d).

| Revision | Date | Summary of Revisions |
|----------|------------------|----------------------|
| 0 | October 17, 2016 | Initial Plan |
| | | |



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MT Registration Number 12805PE

Dated this 13th day of October, 2016

1.0 Introduction

Montana-Dakota Utilities Co. (MDU) operates the Lewis & Clark Station (Lewis & Clark), near Sidney, Montana, a coal-fired steam-electric generating plant that produces coal combustion residuals (CCR). CCR management 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).

This CCR surface impoundments post-closure care plan has been developed to satisfy the requirements of 40 CFR §257.104(d), initial written post-closure care plan, as they apply to MDU's existing scrubber ponds.

The East and West Scrubber Ponds (scrubber ponds) at Lewis & Clark are existing surface impoundments that receive sluiced flue-gas desulfurization (FGD) sludge and some fly ash material.

2.0 Monitoring and Maintenance Activities

MDU will be responsible for the post-closure care of the site in accordance with 40 CFR §257.104. The post-closure care period begins on the date of final closure certification and continues for a period of 30 years from the date of final closure of the entire CCR unit. The following subsections describe the monitoring and maintenance activities required during the post-closure care period.

2.1 Inspection

A routine inspection of the site will be performed twice each year following final closure of the CCR units, and will include the following activities:

- Evaluate settlement of final cover;
- Inspect for soil loss due to erosion;
- Inspect the groundwater monitoring system for damage or degradation;
- Inspect the drainage control facilities for evidence of erosion or accumulation of sediment;
- Evaluate the effectiveness of site security; and
- Inspect facility dikes for damage or degradation.

2.2 Maintenance

Corrective measures will be taken if inspection of the site reveals problems with the liner system, monitoring system, security system, final cover system, or dikes. In the event that substantial erosion, settlement or subsidence occurs, additional erosion protection cover will be placed and compacted to ensure proper run-off and measures to prevent further occurrence of the problem will be evaluated.

Routine maintenance and repair, where necessary, will be conducted on equipment crucial to evaluating and maintaining the integrity of the closed CCR unit. This may include, but is not limited to: monitoring wells and stormwater run-off control structures.

2.3 Groundwater Monitoring

Routine groundwater monitoring will be performed during the post-closure care period in accordance with the groundwater monitoring program required in 40 CFR §257.90 through 40 CFR §257.98.

3.0 Contact Information

The current MDU contact information for post-closure care activities communications is:

Montana-Dakota Utilities Co.

Lewis & Clark Station

35023 Hwy 23 South

Sidney MT 59270

Technical Contact:

Cory Zentner 406-433-1614 ext. 306

E-mail Cory.Zentner@mdu.com

Contact information will be updated as necessary prior to and during the post-closure care period.

4.0 Planned Use of Property

MDU reserves the option to determine final use of the CCR Units site (to the extent of limitations imposed by 40 CFR §257.104) so long as they retain ownership. No use of the site by MDU will be considered that would be detrimental to the liner system, maintenance of adequate final cover, erosion protection, surface water drainage system, and groundwater monitoring wells. If necessary, a demonstration for future planned uses will be certified by a qualified professional engineer that *“demonstrates that disturbance of the final cover, liner, or other component of the containment system, including any removal of CCR, will not increase the potential threat to human health or the environment”* as prescribed in 40 CFR §257.104 (d)(iii).