



400 North Fourth Street
Bismarck, ND 58501
(701) 222-7900

December 11, 2018

Montana-Dakota Utilities Co.'s Publicly Accessible CCR Website

RE: Montana-Dakota Utilities Co.' Lewis & Clark Station – Notification of Completion of Retrofit Activities

To Whom It May Concern:

Montana-Dakota Utilities Co. ("Montana-Dakota") has prepared this notification of completion of retrofit activities. Attached is the certification by a qualified professional engineer as required by paragraph (k)(4) of section 257.102.

Technical Memorandum

To: Sam Marshall
From: Paul Swenson
Subject: Lewis & Clark Station, Scrubber Ponds Retrofit
Date: November 29, 2018
Project: 26411015

Montana-Dakota Utilities Co. (MDU) operates the Lewis & Clark Station (Lewis & Clark), a coal-fired steam-electric generating plant, near Sidney, Montana. Operation of the plant results in production of coal combustion residuals (CCR) that must be managed in accordance with the requirements of 40 CFR 257 Subpart D, Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (CCR Rule).

The East Scrubber Pond and the West Scrubber Pond comprise an existing single, multi-unit surface impoundment CCR unit, as defined by the CCR rule, referred to as the Scrubber Ponds. The Scrubber Ponds receive flue-gas desulfurization (FGD) sludge and some fly ash material.

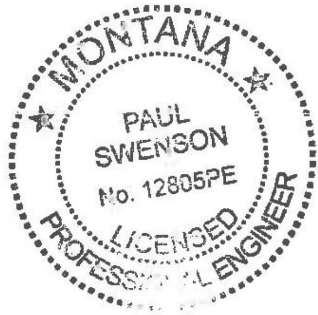
This technical memorandum has been prepared to provide verification that retrofit activities at the Scrubber Ponds were constructed in accordance with the procedures and activities described in the Retrofit Plan for Scrubber Ponds (Barr, April 2018). Information gathered during construction has been reviewed and compared to the retrofit plan to evaluate whether construction was performed in accordance with the plan. The Scrubber Ponds were retrofit with new liners as described in the retrofit plan, and construction procedures and activities generally were conducted in accordance with the plan.

The West Scrubber Pond went into service on September 10, 2018, after retrofit construction activities were completed and construction documentation had been reviewed for conformance to the plans and specifications, and that it was constructed in accordance with the retrofit plan. The East Scrubber Pond went into service on October 15, 2018, after retrofit construction activities were completed and construction documentation had been reviewed for conformance to the plans and specifications, and that it was constructed in accordance with the retrofit plan.

Construction of the retrofit was completed November 12, 2018, with installation of pumps and electrical power controls in the pump house.

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I hereby certify that the retrofit activities for the existing Scrubber Ponds CCR unit at the Lewis & Clark Station were completed in accordance with the retrofit plan and other requirements of the Coal Combustion Residuals Rule 40 CFR §257.102(k) for retrofit activities.



A handwritten signature in cursive script that reads "Paul T. Swenson".

Paul T. Swenson
Barr Engineering Co.
MT Registration Number 12805PE

Dated this 29th day of November,
2018