



Milton R. Young Station • P.O. Box 127 • Center, ND 58530-0127 • Phone (701) 794-8711

March 17, 2009

**Mr. Richard Kinch**  
**U.S. Environmental Protection Agency**  
**Two Potomac Yard**  
**2733 S. Crystal Dr.**  
**5<sup>th</sup> Floor N-5783**  
**Arlington, VA 22202-2733**

RE: Request for Information Under Section 104 (e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9604(e).

Dear Mr. Kinch:

In response to the U.S. Environmental Protection Agency's request for information, the Milton R. Young Station of Minnkota Power Cooperative, Inc. submits three completed questionnaires, with supporting information, for management units associated with the plant.

Please contact me at (701) 794-8711, if you have any questions regarding this information.

Sincerely,

**MINNKOTA POWER COOPERATIVE, INC.**

A handwritten signature in cursive script that reads "Stuart Libby".

Stuart Libby  
Plant Manager - Operations

Enclosures

cc: Craig Bleth/File 160.001  
John Graves  
Scott Hopfauf

## Certification

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature Stuart Libby

Name: Stuart Libby

Title: Plant Manager - Operations

**Minnkota Power Cooperative, Inc.**  
**Milton R. Young Station**  
**March 17, 2009**

**Management Unit: 30- Year Ponds (Cell 2)**

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

**MPC response: This management unit is permitted by two state agencies; the North Dakota State Water Commission (Construction Permit # 901) and the North Dakota Department of Health - Division of Waste Management (Permit SP-159). No regulatory agency has established a National Inventory of Dams potential hazard rating for this management unit.**

2. What year was each management unit commissioned and expanded?

**MPC response: This management unit was commissioned in 2005 (Phase I) and, by design, was expanded in 2007 (Phase II) and 2008 (Phase III).**

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify the other types of materials that are temporarily or permanently contained in the unit (s).

**MPC response: This management unit permanently contains for disposal; (1) fly ash, (3) boiler slag, (4) flue gas emission control residuals.**

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management units(s) under the supervision of a Professional Engineer?

**MPC response: This management unit was designed and constructed under the supervision of a Professional Engineer. The inspection and monitoring of the safety of the management unit is under the supervision of a Professional Engineer.**

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management units(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

**MPC response: By design, this management unit was expanded in 2007 (Phase II) and 2008**

**(Phase III). All designs, and construction, were certified by a Professional Engineer employed by Barr Engineering Company, Minneapolis, MN. Barr Engineering employs over 400 engineers, scientists, and technical support staff providing consultant services in the engineering, environmental, and information technologies disciplines. Barr Engineering has been involved with this project since its inception. Construction Documentation Reports are submitted to the North Dakota Department of Health for approval at the conclusion of each phase of construction.**

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management units(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

**MPC response: This management unit was last inspected by a ND Department of Health Division of Waste Management (NDDH-DWM) official in February 2008. Inspections have typically been made by NDDH-DWM officials at least once per year. The most recent inspection report is attached.**

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management units(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

**MPC response: No safety related issues regarding this management unit have been observed during past evaluations or inspections by State regulatory officials.**

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s)? Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

**MPC response: This management unit is approximately 27 acres in size, with a storage capacity of 2.02 million cubic yards. Current waste volume as of January, 2009 is 1.08 million cubic yards. The maximum height of the management unit is approximately sixty feet.**

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

**MPC response: No spills or unpermitted releases have occurred from this management unit within the last ten years.**

10. Please identify all current legal owner(s) and operator(s) at the facility.

**MPC response: Minnkota Power Cooperative, Inc., is the owner and operator of this facility.**

**Minnkota Power Cooperative, Inc.  
Milton R. Young Station  
March 17, 2009**

**Management Unit: Unit 1 Alternate Bottom Ash Pond**

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

**MPC response: This management unit is permitted by the North Dakota Department of Health, Division of Water Quality, under ND Pollutant Discharge Elimination System ND-0000370. No regulatory agency has established a National Inventory of Dams potential hazard rating for this management unit.**

2. What year was each management unit commissioned and expanded?

**MPC response: This management unit was commissioned in 1986. No expansions have taken place.**

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify the other types of materials that are temporarily or permanently contained in the unit (s).

**MPC response: This management unit temporarily stores bottom ash (2) for dewatering purposes. The pond contains water for approximately 2-3 months every three years.**

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management units(s) under the supervision of a Professional Engineer?

**MPC response: This management unit was designed and constructed under the supervision of a professional engineer. The inspection and monitoring of the safety of the management unit is under the supervision of a Professional Engineer.**

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management units(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

**MPC response: When in service, this management unit is monitored daily by plant operations personnel. Discharge quantity, quality, and pond structural integrity are monitored. If any concerns are apparent the Plant Environmental Department is notified immediately. The Plant Environmental Department is comprised of three engineers (one registered, two non-registered), supervised by a Registered Professional Engineer.**

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management units(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

**MPC response: This management unit was last inspected by a ND Department of Health Division -of Water Quality (NDDH-WQ) official on July 11, 2008. Inspections have typically been made by NDDH-WQ officials at least once per year. A copy of the most recent inspection report is attached.**

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management units(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

**MPC response: No safety related issues regarding this management unit have been observed during past evaluations or inspections by State regulatory officials.**

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s)? Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

**MPC response: This management unit is approximately 2.4 acres in size, with a storage capacity of approximately 40,000 cubic yards. Current waste volume as of March, 2009 is 3,000 dry cubic yards of bottom ash. The pond does not contain free water at this time. The maximum height of the management unit is approximately ten feet.**

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

**MPC response: No spills or unpermitted releases have occurred from this management unit within the last ten years.**

10. Please identify all current legal owner(s) and operator(s) at the facility.

**MPC response: Minnkota Power Cooperative, Inc., is the owner and operator of this facility.**

**Minnkota Power Cooperative, Inc.**  
**Milton R. Young Station**  
**March 17, 2009**

**Management Unit: Horseshoe Pit Evaporation Pond**

1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If the unit(s) does not have a rating, please note that fact.

**MPC response: This management unit is permitted by two state agencies; the North Dakota State Water Commission (Construction Permit # 363) and the North Dakota Department of Health - Division of Waste Management (Permit SP-040). No regulatory agency has established a National Inventory of Dams potential hazard rating for this management unit.**

2. What year was each management unit commissioned and expanded?

**MPC response: This management unit was commissioned in 1990. No expansions of the facility have taken place.**

3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to this question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify the other types of materials that are temporarily or permanently contained in the unit (s).

**MPC response: This management unit contains liquids only (leachate), a category (5) material. This leachate is collected from a closed landfill and placed into the surface impoundment to allow evaporation.**

4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management units(s) under the supervision of a Professional Engineer?

**MPC response: This management unit was designed and constructed under the supervision of a Professional Engineer. The inspection and monitoring of the safety of the management unit is under the supervision of a Professional Engineer.**

5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management units(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?

**MPC response: This management unit is monitored for structural integrity during the monthly inspection conducted under the supervision of a Professional Engineer.**

6. When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management units(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.

**MPC response: This management unit was last inspected by a ND Department of Health Division of Waste Management (NDDH-DWM) official in February 2008. Inspections have typically been made by NDDH-DWM officials at least once per year. The most recent inspection report is attached.**

7. Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management units(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.

**MPC response: No safety related issues regarding this management unit have been observed during past evaluations or inspections by State regulatory officials.**

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s)? Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.

**MPC response: This management unit is approximately four acres in size, with a storage capacity of 34 acre-feet. Current leachate volume contained in the management unit, as of March, 2009, is 11.2 acre-feet. The maximum height of the management unit is approximately six feet.**

9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).

**MPC response: No spills or unpermitted releases have occurred from this management unit within the last ten years.**

10. Please identify all current legal owner(s) and operator(s) at the facility.

**MPC response: Minnkota Power Cooperative, Inc., is the owner and operator of this facility.**

March 18, 2009

Mr. Richard Kinch  
US Environmental Protection Agency  
Two Potomac Yard  
2733 S Crystal Dr.  
5<sup>th</sup> Floor; N-5783  
Arlington, VA 22202-2733

Subject: Request for Information Under Section 104(e) of CERCLA, 42 U.S. C. 9604(e)

Dear Mr. Kinch:

Minnkota has no other facilities to whom you have not sent an information request and which have surface impoundments or similar diked or bermed management units designated as landfills which receive liquid-borne material from a surface impoundment used for the storage or disposal of residuals or by-products from the combustion of coal, including, but not limited to, fly ash, bottom ash, boiler slag, or flue gas emission control residuals.

The responses from those facilities you have sent information requests to will be responded to by those facilities separately.

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of the response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware of significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

MINNKOTA POWER COOPERATIVE, INC.

  
David Loer  
President & CEO