

**BASIN ELECTRIC  
POWER COOPERATIVE**

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March 25, 2009

**OVERNIGHT MAIL**

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:

This letter is in response to the letter dated March 9, 2009 from Barry N. Breen, Acting Assistant Administrator of the U.S. Environmental Protection Agency (EPA) to the Plant Manager of the Laramie River Station (LRS), Wheatland, Wyoming. The March 9, 2009 EPA letter was received by LRS on March 13, 2009.


The LRS located in Wheatland, WY, is owned by the Missouri Basin Power Project (MBPP) and operated by Basin Electric Power Cooperative (Basin Electric). LRS consists of three coal-based electrical generation units, which began commercial operation in the early 1980s.

LRS uses sub-bituminous coal from the Powder River Basin to fuel its three generation units. Coal combustion produces three types of byproducts; bottom ash, fly ash and FGD product. FGD refers to flue gas desulfurization, which is the result of the scrubber operation using lime or limestone to remove sulfur-dioxide emissions.

The LRS management units consist of a bottom ash pond with three cells and an emergency holding pond of two cells.

The Plant Manager of the LRS is Mr. Mike Fluharty who reports to me as the Vice President of Operations for Basin Electric. Enclosed are the specific responses to the Enclosure of the March 9, 2009 EPA letter to the LRS Plant Manager. If you have any further questions, please advise.

Sincerely,

  
Robert W. Holzwarth  
V.P. Plant Operations

/gmj

Enclosures

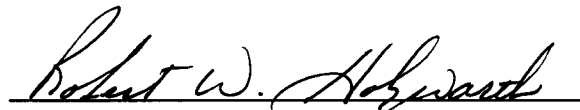
cc: John Corra (w/enc.)  
Ron Harper (w/enc.)

**CERTIFICATION**

**By**

**Authorized Representative**

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.



Name: ROBERT W. HOLZWARTH  
Title: V.P. PLANT OPERATIONS

Laramie River Station (LRS) responses to the Enclosure of the March 9, 2009 EPA letter.

**Question 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 does not have a rating, please note that fact.**

Response 1 The bottom ash pond and the emergency holding pond both have a rating of Low relative to the National Inventory of Dams criteria. The rating for both ponds was established by the Wyoming State Engineer's Office. Both ponds are regulated by the Wyoming State Engineer's Office.

**Question 2** **What year was each management unit commissioned and expanded?**

Response 2 Both the bottom ash pond and the emergency holding pond were commissioned in 1980. Neither pond has been expanded.

**Question 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).**

Response 3 The bottom ash pond contains bottom ash and boiler slag. The emergency holding pond contains flue gas emission control residuals as well as other materials. The other materials consist of water treatment plant spent lime slurry.

**Question 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 unit(s) under the supervision of a Professional Engineer?**

Response 4 Both management units were designed by a Professional Engineer. Both management units were also constructed under the supervision of a Professional Engineer. Inspections that are done by the Wyoming State Engineer's Office are done under the supervision of a Professional Engineer. Please see "Response 4 Attachment 1".

**Question 5** **When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(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?**

Response 5 In June of 2008 an inspection was performed by the LRS Engineering Department in conjunction with the Wyoming State Engineer's Office, Dam Safety Inspector. These inspections take place every five years. This inspection is to determine deficiencies and assess structural integrity of the units. Representing LRS on inspections is the LRS Plant Engineer, Mr. John Ciz. Mr. Ciz has 20+ years experience as Plant Engineer which has included supervision of Engineers (Civil and Mechanical). Experience includes all aspects of LRS Engineering in all areas of the plant. A registered P.E. (Civil) is part of Mr. Ciz's professional staff who accompanies inspections and consults on questions that may arise. Assessments are planned to continue on a minimum five year cycle. Non-formal assessments are conducted on an ongoing basis by LRS Operations personnel during the course of normal duties.

**Question 6 When did a State or a Federal regulatory official last inspect or evaluate the safety (structural integrity) of the management unit(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.**

Response 6 In June of 2008 an inspection was performed by the LRS Engineering Department in conjunction with the Wyoming State Engineer's Office Dam Safety Inspector. These inspections take place every five years. Please see "Response 6 Attachment 1" and "Response 6 Attachment 2".

**Question 7 Have assessments or evaluations, or inspections conducted by State or Federal regulatory officials conducted within the past year uncovered a safety issues(s) with the management unit(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.**

Response 7 No safety issues have been identified with either of the management units at LRS.

**Question 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.**

Response 8 The combined total surface area of all three cells in the bottom ash pond is 104.6 acres and the total storage capacity is 2111.1 acre-feet. The combined total surface area of the emergency holding pond is 54.1 acres and the total storage capacity is 915.7 acre-feet. The current volume of materials in both ponds is unknown. The maximum height of the ash disposal pond is 25 feet. The maximum height of the emergency holding pond is 20 feet.

**Question 9** Please provide a brief history of known spills or unpermitted releases from the unit within the last 10 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).

Response 9 There have been no known spills or unpermitted releases from either of the management units within the last 10 years.

**Question 10** Please identify all current legal owner(s) and operator(s) of the facility.

Response 10 LRS is owned by the Missouri Basin Power Project (MBPP). The MBPP consists of Basin Electric Power Cooperative, Heartland Consumers Power District, Lincoln Electric System, Tri-State Generation and Transmission Association, Western Minnesota Municipal Power Agency and Wyoming Municipal Power Agency.

LRS is operated by Basin Electric Power Cooperative.