

REPORT

Notification of Closure

Drains Pond System East Cell - Coal Creek Station

Submitted to:

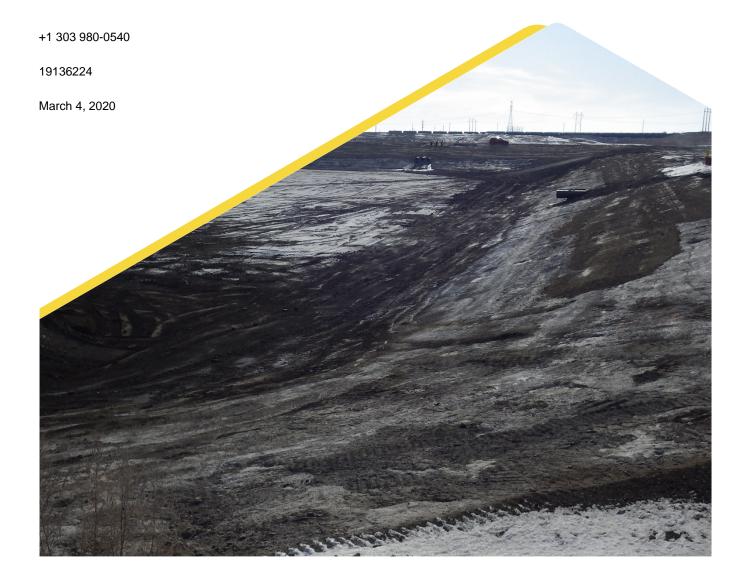
Great River Energy

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Submitted by:

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March 4, 2020 19136224

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1.0 INTRODUCTION

The purpose of this document is to comply with the notification and certification requirements in accordance with the federal EPA Coal Combustion Residual (CCR) rule, 40 CFR Part 257.

Section 257.102(h) of the EPA CCR Rule requires that a notification of closure of a CCR unit be placed in the facility's operating record after completion of closure activities. This document serves as the notice of closure of the east cell of the Drains Pond System CCR Surface Impoundment (Drains Pond System) at Great River Energy's Coal Creek Station located near Underwood, North Dakota.

The Drains Pond System is comprised of three cells: west, center, and east. The east cell of the Drains Pond System was closed by removal of CCR in the winter of 2019/2020 in accordance with Section 257.102(c). The west and center cells are planned to be closed with CCR and other permitted material remaining in place in accordance with §257.102(d). Closure of the west and center cells will occur at a later date and this notification of the completion of closure only pertains to the east cell of the Drains Pond System.

2.0 EAST CELL CLOSURE

40 CFR Section 257.53 defines a CCR surface impoundment as "a natural topographic depression, man-made excavation, or diked area, which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR." Closure of the east cell was performed in accordance with the Drains Pond System Closure and Post-Closure Plan, Revision 1 (dated November 6, 2019) and included removal of sediment containing CCR from within the cell (leaving the protective cover and composite liner system intact). A verification that sediment containing CCR material was removed from the east cell down to the composite liner system protective cover was performed in November of 2019 and a summary of that work will be included in the operating record. Final work associated with closure, including preparations required to put the east cell back into service as a non-CCR surface impoundment, occurred from December 2019 through early 2020. In early 2020, the east cell was returned to operation as a non-CCR surface impoundment for the management of site process water. The east cell will not be used to treat, store, or dispose of CCR.

The east cell of the Drains Pond System will continue to be monitored by the Drains Pond System groundwater monitoring network. As of the Quarter 4 2019 groundwater monitoring sampling event, the Drains Pond System is in detection monitoring and no verified statistically significant increases have been noted in wells downstream of the facility. As the facility is not in assessment monitoring, no groundwater protection standards have been identified to have been exceeded for constituents listed in Appendix IV of the groundwater monitoring program.

As described in the Drains Pond System Closure and Post-Closure Plan, Revision 1 (dated November 6, 2019), at plant closure, the protective cover and underlying composite liner system of the east cell (potentially including embankment materials) are planned to be excavated and disposed of in appropriate permitted and regulated facilities.



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CERTIFICATION 3.0

The undersigned attest to the completeness and accuracy of this notification of completion of closure activities for the east cell of the Drains Pond System at Coal Creek Station in accordance with the Drains Pond System Closure and Post-Closure Plan, Revision 1 (dated November 6, 2019) and the requirements of 40 CFR Section 257.102(c).

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