# Coal Combustion Residual Surface Impoundment History of Construction Documentation

Basin Electric Power Cooperative Leland Olds Station

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#### Purpose

The purpose of this document is to demonstrate compliance with 40 CFR § 257.73(c) for Ash Pond 2 and Pond 3 at Leland Olds Station (LOS). LOS is a lignite coal-fired power plant consisting of two units that generate about 669 megawatts (MW) combined. The power plant, owned and operated by Basin Electric Power Cooperative (Basin Electric), is located approximately four miles southeast of Stanton in Mercer County, North Dakota.

The owner or operator is required to compile a history of construction for existing Coal Combustion Residual (CCR) surface impoundments. The history of construction shall contain, to the extent feasible, the information specified in paragraphs (c)(1)(i) through (xi) of 40 CFR § 257.73. The history of construction presented herein was compiled based on existing documentation, to the extent that it is reasonably and readily available and Basin Electric's site experience.

#### **Inactive Status**

A temporary bottom ash handling system consisting of above-ground concrete weirs and bottom ash collection and dewatering areas was placed into operation ending the transport of CCRs to the surface impoundments prior to effective date of the CCR Rule (October 19, 2015).

Accordingly, the LOS surface impoundments are considered "inactive" under the federal regulations. A "Notification of Intent to Initiate Closure of CCR Surface Impoundment" for Ash Pond 2 and Pond 3 was completed on December 15, 2015, in accordance with § 257.100. On April 18, 2016 the U.S. Environment Protection Agency (EPA) filed a motion to remand and vacate the provisions of the CCR Rule exempting inactive surface impoundments from the CCR Rule requirements. The DC Circuit Court of Appeals issued an order approving the motion on June 14, 2016. Since the exemption for inactive surface impoundments was no longer effective, EPA issued the "Extension Rule" on August 5, 2016. The Extension Rule became effective on October 4, 2016 providing a timeline for inactive units to comply with CCR Rule requirements.

Ash Pond 2 was partially closed in 2017. Approximately 23 acres in the south and southwest areas of the pond were closed in accordance with the design standards specified in 40 CFR § 257.102 and North Dakota Department of Health (NDDoH) permit requirements. The remainder of the pond complex is scheduled to be closed in 2019.

#### **Previous Studies**

Previous studies for Ash Pond 2 and Pond 3 at LOS include an EPA-sponsored site specific assessment of dam safety for CCR impoundments by GEI Consultants (GEI) dated June 2011. Based on the recommendations in the GEI Report, a follow-up study was conducted by AECOM Technical Services (AECOM) in 2012. The AECOM work included Hydrologic and Hydraulic (H&H) studies as well as a geotechnical investigation and structural stability analysis of the Ash Pond 2 and Pond 3 dikes. AECOM recommended flattening the slopes of some of the Pond dikes in order to improve structural stability. Basin Electric implemented these recommendations in 2012 and 2013.

Information regarding the engineering properties of foundation and embankment materials presented in this document is largely derived from the aforementioned GEI and AECOM reports.

#### Operator Contact Information and State Identification Number

LOS CCR surface impoundments are owned and operated by Basin Electric Power Cooperative, located at 1717 East Interstate Avenue, Bismarck, ND 58503. LOS CCR units were first regulated under the North Dakota Department of Health's solid waste management rules in 1982 as Permit SU-038 (later designated as SP-038 and more recently as 0038).

#### Location of CCR Unit(s) on USGS map

The locations of the LOS surface impoundments are identified on the map presented in Appendix I.

#### Purpose and Use of CCR units

Ash Pond 2 contains CCRs (bottom ash) placed in the unit prior to October 19, 2015. Ash Pond 2 currently receives water from the temporary bottom ash handling system and other wastewater flows from the plant. Ash Pond 2 discharges into Pond 3 to allow for the additional removal of suspended solids. Effluent from Pond 3 is conveyed to North Dakota Pollution Discharge Elimination System (NDPDES) Outfall 003 for eventual discharge.

#### **CCR Unit Watershed**

Ash Pond 2 and Pond 3 are located on a terrace deposit of the Missouri River. Accordingly, the CCR surface impoundments are located within the Missouri River watershed, which has an area of approximately 529,000 square miles.

#### Foundation and Abutment Materials

The ash pond complex is situated on a terrace of the Missouri River alluvial plain. Near-surface deposits consist of Quaternary alluvial silts and clays, observed to depths to approximately 18 feet in site geotechnical borings. The alluvial silts and clays are underlain by more than 100 feet of sand and gravel, interpreted to be of glaciofluvial origin. Local bedrock, the Paleocene Sentinel Butte Formation, is present at or near the surface just south of the site. Bedrock was not encountered at a depth of 120 feet in the vicinity of the ash ponds, likely due to a period of erosion that occurred prior to the deposition of the sand and gravel.

The stability of the foundations was evaluated by AECOM using soil data from field investigations and reviewing design drawings, operational and maintenance procedures, and conditions observed in the field. Additionally, slope stability analyses were performed to evaluate slip surfaces passing through the foundations. AECOM determined slope stability exceeds the criteria listed in §257.73(e)(1) for slip surfaces passing through the foundation.

Ash Pond 2 is effectively incised on three sides and has an earthen internal divider dike on its fourth. Therefore, Ash Pond 2 does not have abutments. Pond 3 is a ring dike structure and does not have abutments.

#### **Engineering Properties of Construction Materials**

LOS CCR facilities were constructed in the 1960s and 1970s and are permitted by the North Dakota Department of Health (NDDoH) under Dakota Administrative Code (NDAC) 33-20. The impoundment dikes have been constructed by excavating locally derived materials from the impoundment basins and placing the excavated materials (silts and clays) along the perimeter of the basins to form the impoundment dikes.

The CCR impoundments have not been expanded since being constructed. Based on AECOM's recommendations, however, both the divider dike between Ash Pond 2 and Pond 3 and the

north dike of Pond 3 were reconstructed in 2012-2013. The top 6 to 8 feet of the dikes were excavated, replaced, and recompacted. The dikes were widened to 20 feet and regraded to approximately 3H:1V slopes. Cabled concrete erosion protection was added to the interior slopes between the low and high water operating elevations of the pond.

The CCR unit dikes are generally comprised of granular fill materials that are underlain by native granular or cohesive soil deposits. The granular fill consists of varying materials, including silty clay (CL, CH) and silty sand (SM, SP-fly/bottom ash). The fill material is underlain by layers of silty clay (CL, CH), silty sand (SM), clayey-silt (CL-ML), and silt (ML). The impoundment dike fill soils were similar in texture to the underlying native geologic deposits (described above), supporting the notion that the impoundment dikes were constructed using locally derived material. The relative density of the granular fill soils was typically in the medium dense to very dense range with some intermittent deposits of loose material, based on Standard Penetration Test (SPT) results.

#### **Detailed Dimensional Drawings**

No original design drawings are available for Ash Pond 2 and Pond 3, given the dates of construction (mid-1960s and -1970s). Based on a supplementary geotechnical evaluation completed after the initial GEI assessment, AECOM recommended several measures to improve the structural stability of the surface impoundments. Basin Electric implemented the recommendations in 2012-2013. Drawings 0CY-0019, 0CY-0020, OCY-0021, 0CY-0022, 0CY-23, and 0CY-0026 show details associated with the recent construction and generally reflect current conditions at the site. These drawings are included in Appendix II. Based on the review of the drawings listed above, no natural or manmade features that could adversely affect operation of these CCR units due to malfunction or mis-operation were identified.

#### **Existing Instrumentation**

Instrumentation at the LOS surface impoundments includes staff gauges to measure pool elevation in each of the ponds and a water level indicator at the Pond 3 pump house. No other instrumentation is present.

#### **Area-capacity Tables**

The area-capacity table for the surface impoundment complex was prepared by AECOM in 2018 and reflects current conditions at the site.

**Cumulative Storage** Elevation Surface Area Storage NGVD29 (feet) (acres) (acre-feet) (acre-feet) 1,670.0 30.6 0.0 0 1,672.0 31.5 62 62 1,674.0 32.4 64 126 1,676.0 33.4 66 192 1,678.0 34.4 68 260 1,680.0 35.3 70 329 1,682.0 36.2 71 401 1,684.0 37.2 73 474 1,686.0 38.1 75 549 38.9 77 626 1,688.0 1,690.0 39.5 78 705 1,692.0 39.8 784 79

Table 1. Stage-Storage Relationship

#### Spillways and Diversion Features

Spillways and diversion structures are not present since the surface impoundments have adequate capacity to contain expected flows. In 2018, the storage capacity of the impoundments was evaluated by AECOM for a 24-hour duration design storm for the 1,000-year Inflow Design Flood (IDF) using an AutoCAD Civil3D computer model. The computer model evaluated the ability of the ponds to collect and control the 1,000-yr IDF under existing operational and maintenance procedures. The Civil3D model results for the impoundments indicate that the all CCR units have sufficient storage capacity to adequately manage inflows during peak discharge conditions created by the 1,000-yr IDF. Therefore, the spillway requirements in § 257.73(d)(1)(v)(A) and (B) are not applicable to the impoundments at LOS.

#### Construction Specifications for Maintenance and Repair

Construction specifications for any maintenance or repair of the CCR units would be developed if and when necessary. If necessary, construction specifications would be prepared to meet current design, engineering, and industry standards in accordance with applicable rules and

regulatory guidance. At a minimum, the CCR surface impoundments are visually inspected on a weekly basis in accordance with 40 CFR § 257.83.

#### Structural Stability Information

No indications of structural instability have been observed to date for any of the CCR units at LOS. AECOM conducted initial structural stability and Hydrologic and Hydraulic (H&H) analyses in 2012. The AECOM work included a geotechnical investigation and structural stability analysis of the Ash Pond 2 and Pond 3 dikes. AECOM recommended flattening the slopes of some of the Pond dikes in order to improve structural stability. Basin Electric implemented these recommendations in 2012-2013. The results from structural stability and factors of safety assessments for each of the CCR surface impoundments at LOS are presented in documents prepared by AECOM to meet the requirements of 40 CFR § 257.73(d).

#### Recordkeeping and Reporting

A copy of this document will be placed into the facility's operating record in accordance with 40 CFR § 257.105 (Recordkeeping Requirements) and will be posted to Basin Electric Power Cooperative's CCR Web site in accordance with 40 CFR § 257.107 (Publicly accessible internet site requirements). Notification will be sent to the relevant State Director in accordance with 40 CFR § 257.106 (Notification Requirements).

#### Certification Statement

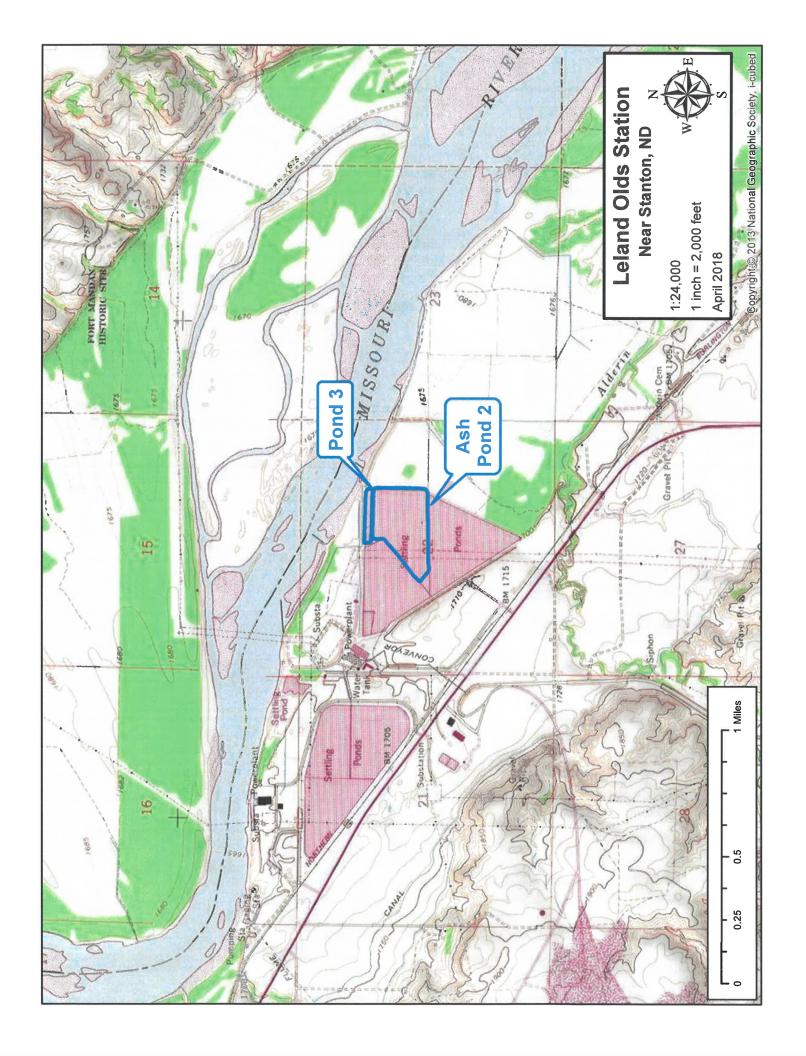
In accordance with the requirements of 40 CFR § 257.73 as specified in the *Standards for the Disposal of Coal Combustion Residuals in Landfills and Impoundments*, I certify the documentation regarding LRS CCR surface impoundment History of Construction is accurate.

PROFESSION

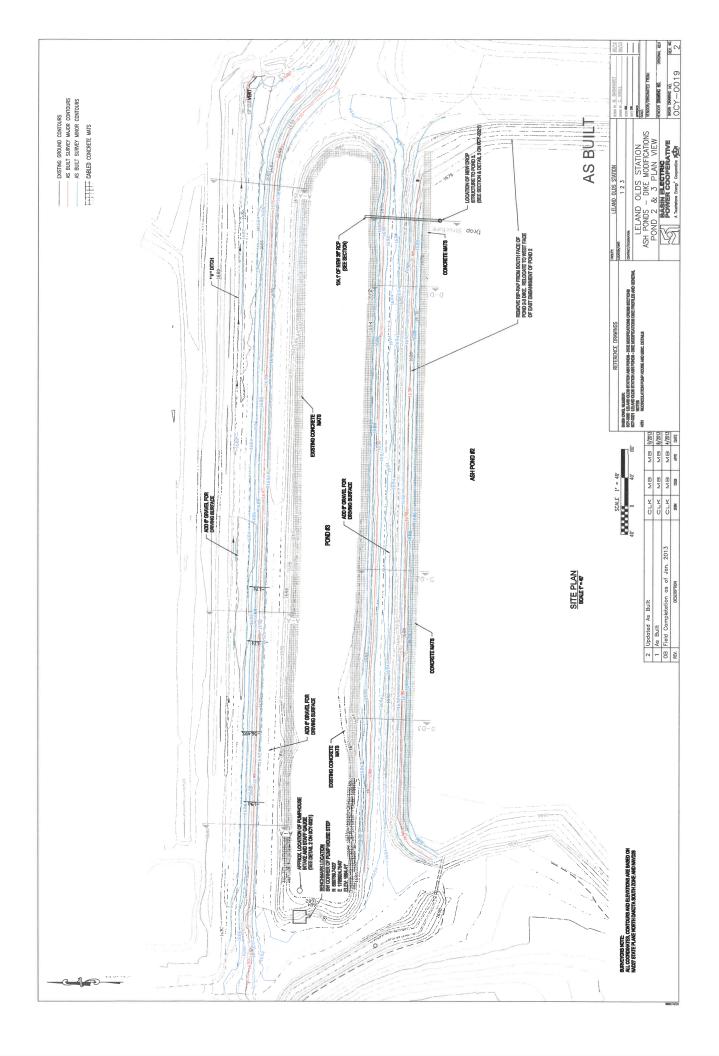
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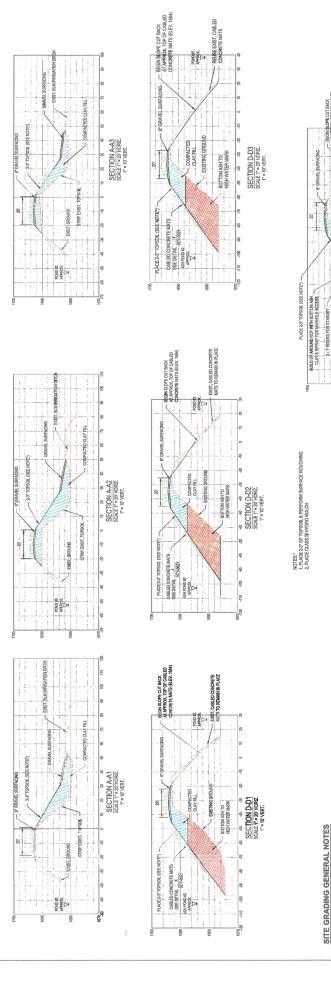
April 17, 2018

Appendix I



Appendix II





LOCATIONS OF THESE POINTS CONTACT THE OWNER. SURVEY COATROL THE OWNER WILL PROVIDE CONTROL PORTS FOR THIS SITE. FOR A THE CANDUSS AND FINSHED CROUND CONTROL POINTS

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POND 63

CLAY FILL

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SECTION AT DROP STRUCTURE SCALE 1"= 20 HORIZ 1"= 10" VERT.

SET BASE ON CRUSHED AGGREGATE.
PLACED ON CLAY BOTTOM.
60 -50 -40 -30 -20

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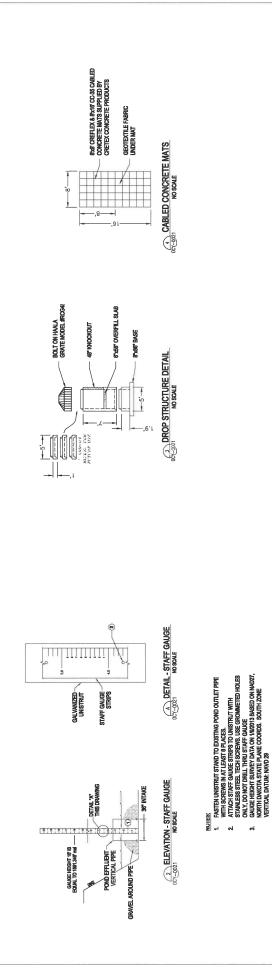
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