

US EPA ARCHIVE DOCUMENT

March 26, 2009

Mr. Richard Kinch
US Environmental Protection Agency (5306P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Northern States Power (NSP) Company Response
Request for Information relating to Surface Impoundments Under 104 (e)
of the Comprehensive Environmental Response, Compensation, and
Liability Act, 42 U.S.C. 9604(e).

Dear Mr. Kinch:

Please find enclosed the response from Northern States Power Company, a Minnesota corporation, d/b/a Xcel Energy (hereafter "NSPM") related to the US Environmental Protection Agency's (EPA) "Request for Information" dated March 9, 2009 for surface impoundments that are used to manage coal combustion residuals or byproducts at our coal fired generation plants.

On March 13, 2009, NSPM, a wholly owned subsidiary of Xcel Energy Inc., received four plant-specific letters from EPA. The plants receiving letters were:

- NSPM Black Dog Power Station in Burnsville, MN
- NSPM Riverside Power Station in Minneapolis, MN
- NSPM Sherburne County Power Station in Becker, MN
- NSPM High Bridge Power Station in St. Paul, MN

Oversight of ash utilization and management at the four plants above is the responsibility of Xcel Energy Inc.'s corporate Environmental Department, so we are consolidating and submitting the requested information for the four facilities as attachments to this letter. The responses are organized to specifically respond to the questions posed in the US EPA letter.

Please note that the former High Bridge coal generation plant in St. Paul was recently replaced by a new gas-combined cycle generating plant of the same name, and which began commercial operation in 2008. The former coal plant is undergoing complete demolition and the associated ash management units have all been permanently removed and/or remediated under a State approved closure plan. As such, EPA's information request is no longer relevant to this plant site.

In an effort to assist the agency in its collection of information, we are also providing copies of those documents where available, which EPA has identified in its requests for information.

We have made every effort to fully respond to EPA's request for information in the very limited amount of time that was provided to us and despite the ambiguous nature of several of the requests. To the best of my knowledge, the information contained in this response is true, accurate, and complete, as of this date. Please direct any questions concerning this submittal to my attention at the address listed below.

Sincerely,



Terry E. Coss, PE
Environmental Director
Xcel Energy

414 Nicollet Mall, Minneapolis, MN 55401

3-26-2009
Date

- Attachment 1: Black Dog Generating Plant
- Attachment 2: Riverside Generating Plant
- Attachment 3: Sherburne County (Sherco) Generating Plant
- Attachment 4: High Bridge Generating Plant

Attachment 1: Black Dog Generation Plant

Background:

The Black Dog generating station collects all coal combustion residues for off-site utilization or disposal. Fly ash is collected dry and sold for concrete production. Bottom ash is mechanically dewatered in bins and trucked off-site for permanent disposal.

The facility has four process water settling ponds connected in series that are designed to remove suspended solids and control water chemistry prior to discharge under the facility NPDES permit. The ponds are not intended for ash disposal but may temporarily receive small amounts of ash incidental to solids removal during process water treatment. Excess solids that settle out in the first pond in the series, which may include ash particles, are periodically dredged, dewatered, and then transported by truck off-site for disposal.

Response to the US EPA Questions

- 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.*

None of the four ponds noted above have been rated by any agency under the National Inventory of Dams. Based on the NID criteria, the four ponds would be classified as low hazard.

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

The original pond was developed at the time when the Black Dog Generating Plant was put into service in the mid – 1950's. The interior dikes installed to split the original pond into four smaller ponds were constructed in 1975.

- 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 type of materials that are temporarily or permanently contained in the unit(s).*

Attachment 1: Black Dog Generation Plant

Small amounts of fly ash and bottom ash are temporarily deposited in the first pond in the series. As noted above, this first pond is periodically dredged and any material removed is dewatered and sent off-site for disposal.

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?*

The original pond, located on the footprint of the four current ponds, was designed as part of the original plant design. We were unable to locate any documentation that the plans were prepared and signed by a Professional Engineer. There is also no record that the interior dikes were designed by a Professional Engineer. A subsequent seepage analysis was completed by a professional engineer as part of a hydrologic analysis of the ponds in 1982.

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 assessment/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?*

The four ponds are essentially "incised" or below grade on three sides. The fourth side consists of the embankment adjacent to the plant cooling lake. Due to the low elevation of the ponds relative to the cooling lake and an adjacent river, the ponds were subject to significant flooding from the Minnesota River in 1997. A professional engineer was retained to inspect the ponds for damage and assess what modifications or repairs were warranted. As a result of that assessment, a flood berm was engineered and constructed with a crest elevation of 715' around the three most operationally significant ponds to provide protection against a 250-year flood. The flood berm is not designed to contain water in the ponds and is not part of the storage capacity calculation

No record of any other structural integrity assessment of the ponds has been found. Given the low risk of a structural failure and the

Attachment 1: Black Dog Generation Plant

absence of potential for significant damage or harm should one occur, the company has no plans to complete a structural assessment in the future unless extraordinary conditions warrant it, such as a flood event of the type noted above.

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.*

The Minnesota Department of Natural Resources, Dam Safety Unit, does not recognize any of the ponds as dams and there has been no state or federal inspections recorded related to the structural integrity of these management units. To our knowledge, there are no inspections planned for these management units.

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 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.*

Not Applicable – Refer to item 6.

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.*

Three of the four ponds each have a design maximum surface area under 2.5 acres and 32 acre-ft (52,000 cubic yards) of storage (both solids and water). The fourth pond has a maximum surface area of 9.33 acres and a maximum design storage volume of 122 acre-ft (195,000 cubic yards). As noted above, the crest of the ponds are at grade except for the side formed by the embankment of the cooling lake. The embankment is approximately 13 ft. high from toe to crest.

We do not have current information on the volume of ash or other

Attachment 1: Black Dog Generation Plant

solids in the four ponds, since the ponds are intended for process water treatment and do not receive significant volumes of solids.

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).*

We have found no record of spills or unpermitted releases from any of the ponds to surface waters or land during the past 10 years.

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

The Black Dog Generating Facility is wholly owned by NSPM, which is a subsidiary of Xcel Energy Inc.

Attachment 2: Riverside Generation Plant

Background: The Riverside Generation Plant is in the process of being converted to a gas fired facility. A single generating unit, Unit #8, remains available to be fired by coal through 2009 if needed, after which time the unit will be converted to 100% gas-fired operation. Unit #8 is currently idle, is not producing ash, and is not expected to operate on coal again before it is converted to gas.

There is one pond, referred to as the Triangle Pond, on the plant property that was used as a process water treatment pond. The pond also collected storm water runoff from the ash load-out area. The pond was recently dredged and currently does not contain any significant quantity of ash. It is anticipated the pond will be removed in 2009 or 2010 as part of the site repowering project.

Response to the US EPA Questions

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.*

The Triangle Pond has not been rated by any agency under the National Inventory of Dams criteria. Based on the NID criteria, the pond would not meet the minimum size for a classification rating.

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

The Triangle Pond was constructed in 1978 and has not been expanded.

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 type of materials that are temporarily or permanently contained in the unit(s).*

The pond previously stored fly ash and bottom ash as well as other process water sediments. Now that the plant is idle, the pond operates as a storm water pond and collects small amounts of sediment from surface runoff.

Attachment 2: Riverside Generation Plant

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?*

The Triangle Pond was designed and certified by a Professional Engineer in 1978. In the limited time available to respond, we were unable to locate any documentation demonstrating that the construction was 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 unit(s)? Briefly describe the credentials of those conducting the structural integrity assessment/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?*

In the limited time available to respond we could not locate records documenting that the pond has been evaluated for structural integrity.

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.*

The Minnesota DNR does not recognize the Triangle Pond as dam and there has been no state or federal inspections recorded related to the structural integrity of these management units. To our knowledge there are no State or Federal inspections planned.

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 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.*

Attachment 2: Riverside Generation Plant

Not Applicable – Refer to item 6.

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.*

The Triangle pond was constructed so that two of the sides are at grade with the surrounding land. The third side is an embankment. The height of the embankment is 20 ft. measured from the downstream toe to the embankment crest.

The surface area and maximum volume of the Triangle Pond are determined to be 0.26 acres (11, 274 sf) and 2,654 cubic yards, respectively. The pond was dredged in 2008 and does not contain any significant volume of solids.

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).*

We have found no record of spills or unpermitted releases from the pond to surface waters or land during the past 10 years.

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

The Riverside Generating Facility is wholly owned by NSPM, which is a subsidiary of Xcel Energy Inc.

Attachment 2: Riverside Generation Plant

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Attachment 3: Sherburne County (Sherco) Generation Plant

Background: Ponds are actively used at Sherco to manage ash solids and scrubber solids generated at the plant. All of the ponds are lined with clay and/or geosynthetic liners and are operated under NPDES permits issued by the state of Minnesota.

Bottom ash generated at each of the three generating units is hydraulically transported to a pond (Bottom Ash Pond) that temporarily stores the ash until it can be removed from the pond.

Fly ash and scrubber solids from Generating Units 1 and 2 is hydraulically transported to a pond that allows for settling of the solids and provides for permanent disposal after dewatering and capping. The end result of this process is to provide for permanent disposal in the equivalent of a dry disposal facility. Currently, three ponds exist for disposal of fly ash and scrubber solids.

Pond No. 1 is closed and a geomembrane cover is in place. The residual water retained in the pond is actively being removed using pumps and the pond is approximately 67% dewatered.

Pond No. 2 is in the final stages of filling and approximately 40% of the pond is closed with a geomembrane cover. Once the final cover is completely in place, the pond will be actively dewatered using pumps.

Pond No. 3 is active and being constructed in stages as needed. The pond is lined with a composite liner (60 mil HDPE geomembrane and a geosynthetic clay liner) and has features to allow for active dewatering once the pond is filled, capped and closed.

The ash and scrubber solids from Generating Unit 3 are managed dry and disposed in a landfill located on the plant property. The landfill is lined with leachate collection, and is capped in stages with a geo-membrane as portions are filled to capacity.

There are also two incised basins at the plant that receive ash contact water. The Recycle Basin is a combined process water and storm water pond that is clay and HDPE composite lined, with roller compacted concrete placed over the liner so that the pond can be dredged as needed. This basin receives the discharge from the bottom ash pond and there can be a small amount of ash particle carryover from the pond to the basin. The other incised basin is associated with the Unit No. 3 dry ash landfill. The landfill has been designed to gravity drain leachate collected from the landfill to a geo-membrane-lined basin. Water collected in the basin is

Attachment 3: Sherburne County (Sherco) Generation Plant

recycled back to plant process water system. Leachate is filtered through a granular drain located on the base of the landfill prior to entering the basin, thus very few ash particles end up in this basin.

Response to the US EPA Questions

- 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.*

The Bottom Ash pond and Pond Nos. 2 and 3, used for fly ash and scrubber solids, are regulated by the Minnesota Department of Natural Resources, Dam Safety Division. These impoundments are classified by the state as a Class II structure (Significant Hazard). As a result of Pond 1 being permanently closed and substantially dewatered, the structure is not regulated by the State DNR and is estimated by the site engineer to have a rating of "Low Hazard".

Since the Recycle Basin and the Unit No. 3 Dry Ash Landfill Basin are incised, the NID rating does not apply to these two facilities.

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

The Bottom Ash Pond was put into service in 1975 with the embankment crest elevation at 1000 ft MSL, except for a portion at the NE corner of the pond set at elevation 975 ft MSL to accommodate the bottom ash slurry piping. In 1982, the NE corner of the pond was raised to match the crest elevation of 1000 ft MSL.

Pond No. 1 was put into service in 1975 with a crest elevation of 1000 ft MSL. The pond remained in service until final closure was completed in 1995. Active dewatering of the pond commenced in 1995 and continues through the present.

Pond No. 2 was put into service in 1984 with a crest elevation of 992.5 ft MSL and was expanded three times to a final crest elevation of 1012 ft MSL. At present, the pond is substantially filled and is in the process of being closed.

Attachment 3: Sherburne County (Sherco) Generation Plant

Pond No. 3 is divided into two sections, Pond No. 3S (South) and Pond No. 3N (North). Pond No. 3N was put into service in 2004 with a crest elevation of 976 ft. MSL. Pond No. 3N was expanded in 2008 to a crest elevation of 997 ft. MSL. The first phase of Pond No. 3S is planned for construction during the summer of 2010.

The Recycle Basin was constructed in 1975 and the Unit No. 3 Dry Ash Landfill Basin was constructed in 1986 as part of Unit No. 3 construction.

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 type of materials that are temporarily or permanently contained in the unit(s).*

The Bottom Ash Pond temporarily stores the bottom ash generated at all three generating units. No other coal combustion residuals are discharged into this pond.

Pond Nos. 1, 2 and 3 receive coal combustion residuals in the forms of fly ash, bottom ash, boiler slag and flue gas emission controls residuals. Other materials that may be disposed of in the ponds include coal and materials allowed under the facility NPDES permit.

The Recycle Basin collects residuals from the Bottom Ash Pond as well as small amounts of fly ash and flue gas emission controls residuals that may be carried in the process water. The Unit No. 3 Dry Ash Landfill Basin contains the contact water and small amounts of solids from placement of fly ash and flue gas emission controls residuals. The Dry Ash Landfill Basin also contains bottom ash contact water associated with the use of bottom ash as the drainage layer in the landfill.

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?*

The original construction and all of the expansion for the ponds

Attachment 3: Sherburne County (Sherco) Generation Plant

located on the plant property were designed by a Professional Engineer. Construction of all phases of the pond construction was completed under the direct supervision of a Professional Engineer to ensure that the plans and specifications were executed in the field. The plant retains an engineer on staff whose primary responsibility is operation and construction oversight of all on-site coal combustion residuals management units.

The Recycle Basin and the Unit No. 3 Dry Ash Landfill Basin were both designed and constructed by a Professional Engineer. Due to the incised nature of the two basins, there is no formal inspection program for structural integrity.

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 assessment/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?*

The structural integrity of each of the ponds was evaluated by a Professional Engineer as part of a complete geotechnical evaluation done for the original construction and subsequently updated for each of the expansions. The ponds are regularly observed by the site engineer, a consulting Professional Engineer responsible for the pond design, and the on-site construction manager, as part on ongoing management and construction activities. When erosion damage or other issues observed by any of the personnel is noted, the site engineer retains a consulting Professional Engineer to evaluate the damage and design a repair to re-establish the structural integrity. There is no "special" assessment planned outside of the current on-going observation and response program already in place.

Since the Recycle Basin and the Unit No. 3 Dry Ash Landfill Basin are incised basins, there has not been a need to evaluate the structural integrity of the basins. There is no plan to evaluate the structural integrity of these basins in the future.

Attachment 3: Sherburne County (Sherco) Generation Plant

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.*

The Minnesota DNR completed an inspection of the Bottom Ash Pond in June, 2008 (attached). Documentation of a Minnesota DNR inspection of the Ponds was last noted in 1996 by a NSPM employee (attached). There was no record of a Minnesota DNR report for the 1996 inspection. The Minnesota DNR has signaled their intention to inspect the ponds in 2009.

Since the Recycle Basin and the Unit No. 3 Dry Ash Landfill Basin are incised basins, the state does not recognize these basins as needing oversight related to structural integrity. Consequently, no inspection for structural integrity by either state or federal agencies has been performed.

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 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.*

No

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.*

The Bottom Ash Pond has a surface area of 18 acres and a combined volume (solids and water) of approximately 1 million cubic yards. The pond currently contains approximately 700,000 cy of bottom ash. The minimum height of the embankment above surrounding grade elevation of 959 ft. MSL is 41 ft.

Pond No. 1, now closed, has a surface area of 62 acres. The volume

Attachment 3: Sherburne County (Sherco) Generation Plant

of scrubber solids deposited in the pond is 4 million cubic yards. There is another 1 million cubic yards of ash placed above the impoundment crest to shape the final cover grade and allow the cap to shed runoff. The minimum height of the embankment above the surrounding grade minimum elevation of 959 ft MSL is 41 ft. The pond has actively been dewatered since 1995 and the current average water level in the pond is located at an elevation of 962 ft.

Pond No. 2 has a surface area of 100 acres and a combined volume (solids and water) of approximately 10 million cubic yards. There is approximately 9 million cubic yards of scrubber solids, ash and water in the pond. To date, approximately 40% of the pond has been permanently closed and capped with a geo-membrane liner. Approximately 1.2 million cubic yards of ash has been placed above the impoundment crest to shape the final cover grade and allow the cap to shed runoff. The minimum height of the embankment above the surrounding grade minimum elevation of 955 ft MSL is 57 ft.

Pond No. 3N has a surface area of 50 acres and a combined volume (solids and water) of 3 million cubic yards. At present, there is approximately 1.5 million cubic yards of ash, scrubber solids and water in the pond. The minimum height of the embankment above surrounding grade elevation of 940 ft MSL is currently 57 ft. At completion of the Pond No. 3 development, the maximum height of the embankment will be 72 ft.

The Recycle Basin has a surface area of 7.0 acres and, due to the incised nature of the pond has zero capacity based on the EPA definition for volume. The Unit No. 3 Dry Ash Landfill Basin has a surface area of 3.4 acres and, due to the incised nature of the pond has zero capacity based on the EPA definition for volume.

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).*

We have found no record of spills or unpermitted releases from the ponds or basins to surface waters during the past 10 years. We have records of two minor releases from ponds to land during that period.

In the Spring of 2008, the piping used to transmit the fine fraction of

Attachment 3: Sherburne County (Sherco) Generation Plant

the bottom ash from hydraulic dredging of the bottom ash pond broke and approximately 8000 gallons of water and ash was discharged over the Bottom Ash Pond embankment to the ground. The integrity of the pond was not jeopardized by this event.

In May of 2007, during closure of Pond No. 2, storm water collected during a heavy rain event overtopped a temporary construction berm, resulting in 600 gallons of rainwater ash and soil flowing down the side of the Pond No. 2 embankment to the ground. The integrity of the pond was not jeopardized by this event.

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

Generating Unit Nos. 1 and 2 of the Sherburne County Generating Facility are wholly owned by NSPM, which is a subsidiary of Xcel Energy Inc. Generating Unit No. 3 is jointly owned by NSPM and Southern Minnesota Municipal Power Agency.

Attachment 3: Sherburne County (Sherco) Generation Plant

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Attachment 4: High Bridge Generation Plant

Background: The High Bridge Generation Plant in St. Paul that was the intended recipient of the March 13, 2009 EPA letter is no longer in operation. The old High Bridge coal plant was replaced by a new gas-combined cycle generating plant of the same name that began commercial operation in 2008. The old coal plant is undergoing complete demolition and the associated ash management units have been permanently removed and/or remediated under a State approved closure plan. All of the ponds associated with the High Bridge coal fired power plant have been removed and no longer exist. All of the ash contained in the ponds was removed and taken off-site for disposal. No coal combustion residuals are left on the High Bridge plant site.

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.*

N/A

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

N/A

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 type of materials that are temporarily or permanently contained in the unit(s).*

N/A

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?*

N/A

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 assessment/evaluations. Identify*

Attachment 4: High Bridge Generation Plant

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?

N/A

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.*

N/A

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 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.*

N/A

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.*

N/A

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).*

N/A

Attachment 4: High Bridge Generation Plant

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

N/A