

US EPA ARCHIVE DOCUMENT

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com

September 2, 2010



Mr. Craig Dufficy
U.S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Dufficy:

Subject: Otter Tail Power Company - Coyote Station
Response to EPA CERCLA Section 104(e) Request for Information
Dated August 24, 2010

Accompanying this letter are Otter Tail Power Company's (Otter Tail) Responses to the EPA Comprehensive Environmental Response, Compensation and Liability Act Section 104(e) Request for Information dated August 24, 2010 for Coyote Station. Otter Tail received the Request on August 30, 2010.

Otter Tail does not consider its Responses confidential information or trade secrets. Otter Tail is not aware of any documents that are responsive to this request.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Ward Uggerud", is written over a faint, circular embossed seal.

Ward Uggerud
Senior Vice President

Otter Tail Power Company - Coyote Station
Response to EPA CERCLA Section 104(e) Request for Information
Received August 30, 2010

Otter Tail Power Company provides the following Responses to each corresponding Request concerning the Coyote Station as provided in Enclosure A to the August 24, 2010 EPA Request for Information (Request).

Coyote Station operates three surface impounds that are responsive to this Request. Based on the plant descriptions, they are sluice pond, the ash pond and the Nelson Pond or decant pond. The responses are provided with respect to these three ponds.

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 units(s). If the unit(s) does not have a rating, please note that fact.

Response: None of the management units have been rated relative to the National Inventory of Dams criteria.

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

Response: The following are the management unit commissioning dates:

Sluice Pond:	1981
Ash Pond:	1981
Nelson Pond:	1992

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: All of the pond management units provide only temporary storage for dewatering purposes. The water that is collected is reused for plant process purposes. The material temporarily stored in each pond is identified as follows:

Sluice Pond: boiler slag and other (economizer ash, air heater wash water, boiler fire-side wash water)

Ash Pond: other (water and fine material carry-over from the Sluice Pond and decant water from Nelson Pond, plant site and coal-pile runoff, plant sump drains, water treatment system wastewater, and sewage house effluent)

Nelson Pond: other (material dredged from Ash Pond) The dredged material is decanted in Nelson Pond and the remaining solids are subsequently removed for final disposal at an onsite 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?

Response: All three management units were designed by third-party professional engineers. General visual management unit inspections are performed by the plant engineering staff.

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: The company has not conducted a formal safety (structural integrity) assessment of the management units.

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: The management units have not been inspected or evaluated for safety by a State or Federal official.

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.

Response: As noted in response to Request No. 7 above, the management units have not been inspected or evaluated for safety by a State or Federal official.

8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of material 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: The surface area (acres), total storage capacity, the estimated volume of material currently stored in each management unit, the date the volume measurements were taken, and the maximum height of each management unit are provided in the following table.

Management unit	Surface area (acres)	Total storage capacity (cubic yards)	Estimated volume of material currently stored	Date volume measurements were taken	Maximum height of each management unit
Sluice pond	Approx. 1 acre	Approximately 8150 cubic yards	Pond dredged on on-going basis on Monday through Friday schedule		0 feet – excavated management unit
Ash pond	Approx. 4 acres	Approx. 64,530 cubic yards	Pond dredged in June of 2010 – Estimated current volume of 10,000 to 13,000 cubic yards	September 1, 2010	0 feet – excavated management unit
Nelson pond	Approx. 5 acres	Approx. 148,540 cubic yards	Nelson Pond excavated following dewatering in 2009. Approx. 31,731 cubic yards transferred to Nelson Pond from Ash Pond in 2010	September 1, 2010	12.21 feet

9. Please provide a brief history of known spills or unpermitted released from the unit within the last ten years, whether or not these were reported to State of 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: There are no known spills or unpermitted releases to surface water or to land from any of the three management units within the last ten years.

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

Response: The legal owners and operator of the facility are as follows:

Northern Municipal Power Agency

Montana-Dakota Utilities Co., a Division of MDU Resources Group, Inc,

NorthWestern Corporation d/b/a NorthWestern Energy, and

Otter Tail Power Company, a wholly owned subsidiary of Otter Tail Corporation

Otter Tail Power Company is the designated operator of Coyote Station.