

## Memorandum

**Subject:** Disposal of Coal Combustion Residuals from Electric Utilities  
Revised Closure Feasibility Certification  
**Date:** October 26, 2016  
**Project:** Xcel Energy Black Dog Generating Station

The Environmental Protection Agency (EPA) published a final rule to regulate the disposal of coal combustion residuals (CCR) as solid waste under subtitle D of the Resource Conservation and Recovery Act (RCRA), 40 CFR Parts 257 and 261 (Rule). Three CCR surface impoundments, Ash Ponds 1 through 3, are located at the Black Dog Generating Station in Burnsville, MN. Xcel Energy proposes to close the CCR surface impoundments through removal of CCR, per Rule section 257.100.

The surface impoundments will be dredged in series starting with Ash Pond 3, followed by Ash Pond 2, then Ash Pond 1. The impoundments will be dewatered prior to dredging beginning on that impoundment. Once dewatered, dredging will commence mechanically and the removed material stockpiled on an adjacent impervious pad. Approximately 30,000 cubic yards of CCR material (operational ash) will be removed from the ponds placed under the authority of NPDES Permit MN0000876 to the defined impoundment bottom elevation of 695-ft. The dewatered ash will be hauled off-site to an approved facility permitted to accept the waste. The anticipated closure schedule is summarized below:

Impoundment	Dewatering	CCR Removal
Ash Pond 3	October, 2016	November, 2016
Ash Pond 2	November, 2016	November, 2016
Ash Pond 1	November, 2016	December, 2016

Closure of the inactive CCR surface impoundments located at the Xcel Energy Black Dog Generating Station is technically feasible as specified in the Rule.

### **Professional Engineer Certification:**

I hereby certify that this plan, specification, or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer under the laws of the state of Minnesota.



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