Combined Application for Certificate of Corridor Compatibility and Route Permit

Appendix G

Agency Correspondence

NORTH Dakota | Environmental Quality
Be Legendary.

September 18, 2023

Pierina Fayish
NEPA Compliance Officer
Dept. of Energy, National Technology Laboratory
626 Cochran Mill Rd.
Pittsburgh, PA 15236

Re: Project Code: DOE/EA-D2197, Project Tundra Draft Environmental Assessment in Oliver County

Dear Ms. Fayish:

The North Dakota Department of Environmental Quality has reviewed the information concerning the above-referenced project received at the department on August 21, 2023, with respect to possible environmental impacts.

9-1 1. Care is to be taken during construction activity near any water of the state to minimize adverse effects on a water body. This includes minimal disturbance of stream beds and banks to prevent excess siltation, and the replacement and revegetation of any disturbed area as soon as possible after work has been completed. Caution must also be taken to prevent spills of oil and grease that may reach the receiving water from equipment maintenance and/or the handling of fuels on the site. Guidelines for minimizing degradation to waterways during construction are attached.

9-2 2. Projects disturbing one or more acres are required to have a permit to discharge stormwater runoff until the site is stabilized by the re-establishment of vegetation or other permanent cover. Further information on the stormwater permit may be obtained from the department's website or by calling the Division of Water Quality at 701-328-5210. Also, cities may impose additional requirements and/or specific best management practices for construction affecting their storm drainage system. Check with the local officials to be sure any local stormwater management considerations are addressed.

9-3 Minnkota Power Cooperative, Inc. (Minnkota) must notify the North Dakota Pollutant Discharge Elimination System (NDPDES) Program in advance of any planned changes at Milton R. Young Station due to Project Tundra which may affect current and future NDPDES permits for the facility (ND-000370 and NDR05-0012). This includes facility expansions, production increases, and process modifications which result in new, different, or increased discharges of pollutants. In particular, Minnkota must work with the NDPDES Program to determine what effects the amine-based post-combustion carbon capture, ultra-filtration, and nano-filtration technologies will have on Nelson Lake, Square Butte Creek, and/or other receiving streams, and how changes to the Missouri River intake structure

918 East Divide Avenue | Bismarck ND 58501-1947 | Fax 701-328-5200 | deq.nd.gov

Director's Office 701-328-5150
Division of Air Quality 701-328-5188
Division of Municipal Facilities 701-328-5211
Division of Waste Management 701-328-5166
Division of Water Quality 701-328-5210
Division of Chemistry 701-328-6140 2635 East Main Ave Bismarck ND 58501

9-3 (cont'd.) could affect impingement and entrainment requirements. Changes which may result in a facility being designated as a "new source" as determined by 40 CFR 122.29(b) must also be reported to the NDPDES Program.

9-4 3. The construction project does not overlie a defined surficial aquifer; however, it does overlie a non-community well protection area. Care should be taken to avoid spills of any materials that may have an adverse effect on groundwater quality. All spills must be immediately reported to this Department and appropriate remedial actions performed.

9-5 4. The proposed project appears to have the potential to be a source of emissions to the air capable of causing or contributing to air pollution and may be required to have an Air Pollution Control Permit to Construct/Operate as required by Chapter 33.1-15-14 of the North Dakota Air Pollution Control Rules. The applicant should contact the department's Air Pollution Control Program at 701-328-5188 prior to commencing construction.

9-6 5. All solid waste materials must be managed and transported in accordance with the state's solid and hazardous waste rules. Appropriate efforts to reduce, reuse and/or recycle waste materials are strongly encouraged. As appropriate, segregation of inert waste from non-inert waste can generally reduce the cost of waste management. Further information on waste management and recycling is available from the department's Division of Waste Management at 701-328-5166.

9-7 6. Projects that involve construction of pipelines should select locations that minimize the potential for impacts to human health and the environment during and after construction by avoiding, when possible, source water protection areas and sensitive surface and groundwater environments. Additionally, when possible, pipeline routes should select areas with natural barriers to both surface and ground waters. Human health and the environment
9-8 should be further protected by developing a spill response plan that emphasizes rapid deployment of prepositioned assets necessary to contain spills and subsequent cleanup. Proper surveillance and monitoring for early detection of leaks should be required.

Division of Waste Management – UST Program

9-9 The department's UST Program does have historical underground storage tanks within the Tundra (Milton R. Young Station/Minnkota Power Coop) facility in Center, ND. (See attachment.)

If the construction or demolition will require the removal, installation or replacement of any UST system (tanks, piping or associated components) or the reporting of any release, it will need to follow the TECHNICAL STANDARDS AND CORRECTIVE ACTION REQUIREMENTS FOR OWNERS AND OPERATORS OF UNDERGROUND STORAGE TANKS, CHAPTER 33.1-24-08 regarding notification, installation, closure and compliance. The regulations can be found at https://www.legis.nd.gov/information/acdata/pdf/33.1-24-08.pdf

9-10 These comments are based on the information provided about the project in the above-referenced submittal. The U.S. Army Corps of Engineers may require a water quality certification from this department for the project if the project is subject to their Section 404 permitting process. Any additional information which may be required by the U.S. Army Corps of Engineers under the process will be considered by this department in our determination regarding the issuance of such a certification.

The department owns no land in or adjacent to the proposed improvements, nor does it have any projects scheduled in the area. In addition, we believe the proposed activities are consistent with the State Implementation Plan for the Control of Air Pollution for the State of North Dakota.

If you have any questions regarding our comments, please feel free to contact this office.

Sincerely,

L. David Glatt, P.E., Director
North Dakota Department of Environmental Quality

LDG:ll
Attach.

Construction and Environmental Disturbance Requirements

The following are the minimum requirements of the North Dakota Department of Environmental Quality for projects that involve construction and environmental disturbance in or near waters of the State of North Dakota. They ensure that minimal environmental degradation occurs as a result of construction or related work which has the potential to affect waters of the state. All projects must be constructed to minimize the loss of soil, vegetative cover, and pollutants (chemical or biological) from a site.

9-11 **Soils**

Prevent the erosion and sediment loss using erosion and sediment controls. Fragile and sensitive areas such as wetlands, riparian zones, delicate flora, and land resources must be prohibited against compaction, vegetation loss and unnecessary damage.

9-12 **Surface Waters**

All construction must be managed to minimize impacts to aquatic systems. Follow safe storage and handling procedures to prevent the contamination of water from fuel spills, lubricants, and chemicals. Stream bank and stream bed disturbances must be contained to minimize silt movement, nutrient upsurges, plant dislocations, and any physical chemicals, or biological disruption. The use of pesticides or herbicides in or near surface waters is allowed under the department's pesticide application permit with notification to the department.

9-13 **Fill Material**

Any fill material placed below the ordinary high-water mark must be free of topsoil, decomposable materials, and persistent synthetic organic compounds, including, but not limited to, asphalt, tires, treated lumber, and construction debris. The department may require testing of fill material. All temporary fills must be removed. Debris and solid waste must be properly disposed or recycled. Impacted areas must be restored to near original condition.

Facility Form Report

Tuesday, September 5, 2023

Facility Information

Name	Minnkota Power Cooperative Inc	**ID**	46
Sub Name	Milton R Young Station	**EPA ID**	
Address	3401 24th St SW	**PTRCF ID**	447
Address 2	Box 127	**Latitude**	47.068796
City State Zip	Center ND 58530 -	**Longitude**	-101.218347
County	Oliver	**Collection Method**	Address Matching
Phone	(701) 794-8711	**Reference Point**	Entrance Point
Region	4	**Facility Directory**	46
UST Status	Inactive	**Facility Profiler ID**	3384
LUST Standing	Inactive	**Mail Delivered To**	Facility
Archived	☐	**Notification Rec**	02/26/1990
		DSR Hard Copy	☐

Type of Owner

Type	Commercial	**ID**	1276
Owner	Minnkota Power Cooperative Inc		
Address	5301 32nd Avenue South		
City State Zip	Grand Forks ND 58201-		

Indian Lands

Indian Lands ☐
Tribe Owned ☐
Tribe

Type of Facility

Describe the kind of facility Utilities
SIC Codes 4939
NAICS Codes 221

Dispenser Information:
☐ Single Hose Dispenser
☐ Credit Card/Cardtrol Only
☐ No Retail Sale
☐ Blender Pump

Comments

Financial Responsibility

Financial responsibility requirements met for less than 100 tanks / $1 million ☑

Self-Insured	☑	**State Fund**	☑
Insurance	☐	**Letter of Credit**	☐
Risk Retention Group	☐	**Trust Fund**	☐
Guarantee	☐	**Other**	☐
Surety Bond	☐	**Not Listed**	☐
Federal Governement	☐	**Railroad**	☐

Comments #447

Financial responsibility requirements met for more than 100 tanks / $2 million ☐

Self-Insured	☐		
Insurance	☐	**Letter of Credit**	☐
Risk Retention Group	☐	**Trust Fund**	☐
Guarantee	☐	**Other**	☐
Surety Bond	☐	**Not Listed**	☐
Federal Government	☐	**Railroad**	☐

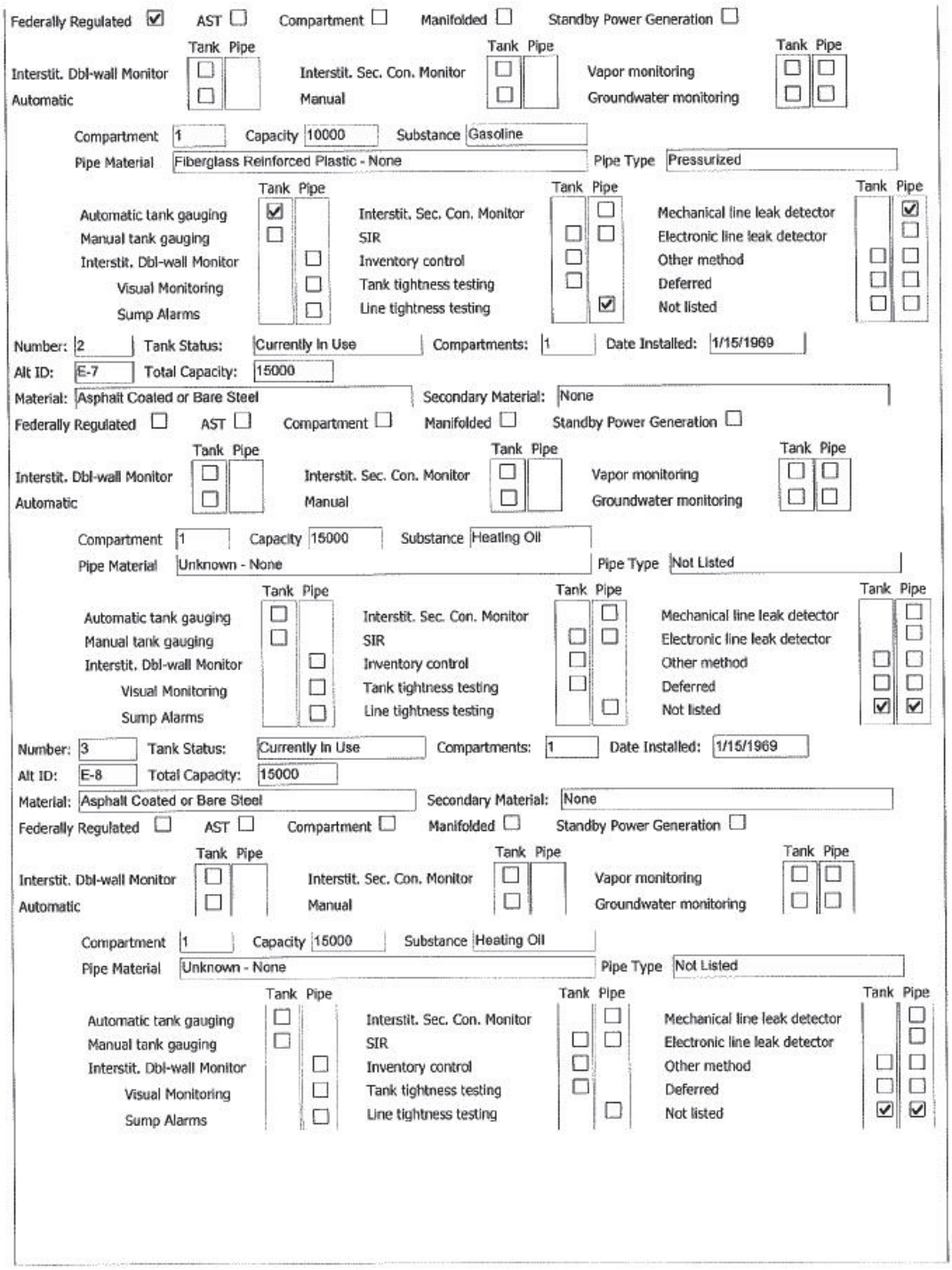
FR Agency
FR Policy No
FR Exp Date
Comments

Certification

Name John T Graves **Title** Environmental Supervisor **Date** 12/17/1991

Tank

Number:	1	Tank Status:	Permanently Out of Use	Compartments:	1	Date Installed:	10/5/1984
Alt ID:	1	Total Capacity:	10000				
Material:	Fiberglass Reinforced Plastic			Secondary Material:	None		



Federally Regulated ☑ AST ☐ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 10000 Substance Gasoline
Pipe Material Fiberglass Reinforced Plastic - None Pipe Type Pressurized

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☑		Interstit. Sec. Con. Monitor		☐	Mechanical line leak detector		☑
Manual tank gauging	☐		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☑	Not listed	☐	☐

Number: 2 Tank Status: Currently In Use Compartments: 1 Date Installed: 1/15/1969
Alt ID: E-7 Total Capacity: 15000
Material: Asphalt Coated or Bare Steel Secondary Material: None
Federally Regulated ☐ AST ☐ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 15000 Substance Heating Oil
Pipe Material Unknown - None Pipe Type Not Listed

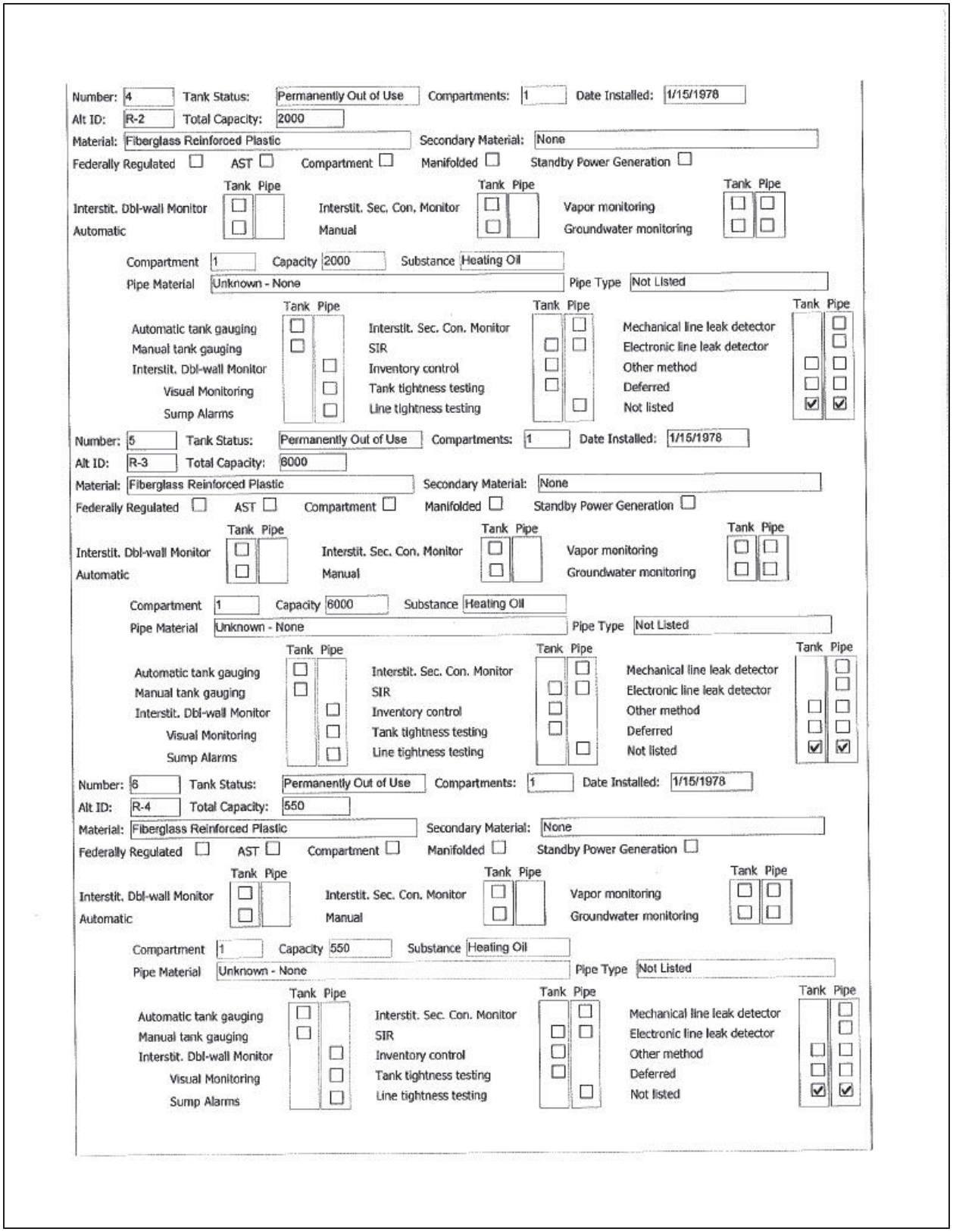
	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor		☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 3 Tank Status: Currently In Use Compartments: 1 Date Installed: 1/15/1969
Alt ID: E-8 Total Capacity: 15000
Material: Asphalt Coated or Bare Steel Secondary Material: None
Federally Regulated ☐ AST ☐ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 15000 Substance Heating Oil
Pipe Material Unknown - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor		☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑



Number: 4 Tank Status: Permanently Out of Use Compartments: 1 Date Installed: 1/15/1978
Alt ID: R-2 Total Capacity: 2000
Material: Fiberglass Reinforced Plastic Secondary Material: None
Federally Regulated ☐ AST ☐ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 2000 Substance Heating Oil
Pipe Material Unknown - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor		☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 5 Tank Status: Permanently Out of Use Compartments: 1 Date Installed: 1/15/1978
Alt ID: R-3 Total Capacity: 6000
Material: Fiberglass Reinforced Plastic Secondary Material: None
Federally Regulated ☐ AST ☐ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 6000 Substance Heating Oil
Pipe Material Unknown - None Pipe Type Not Listed

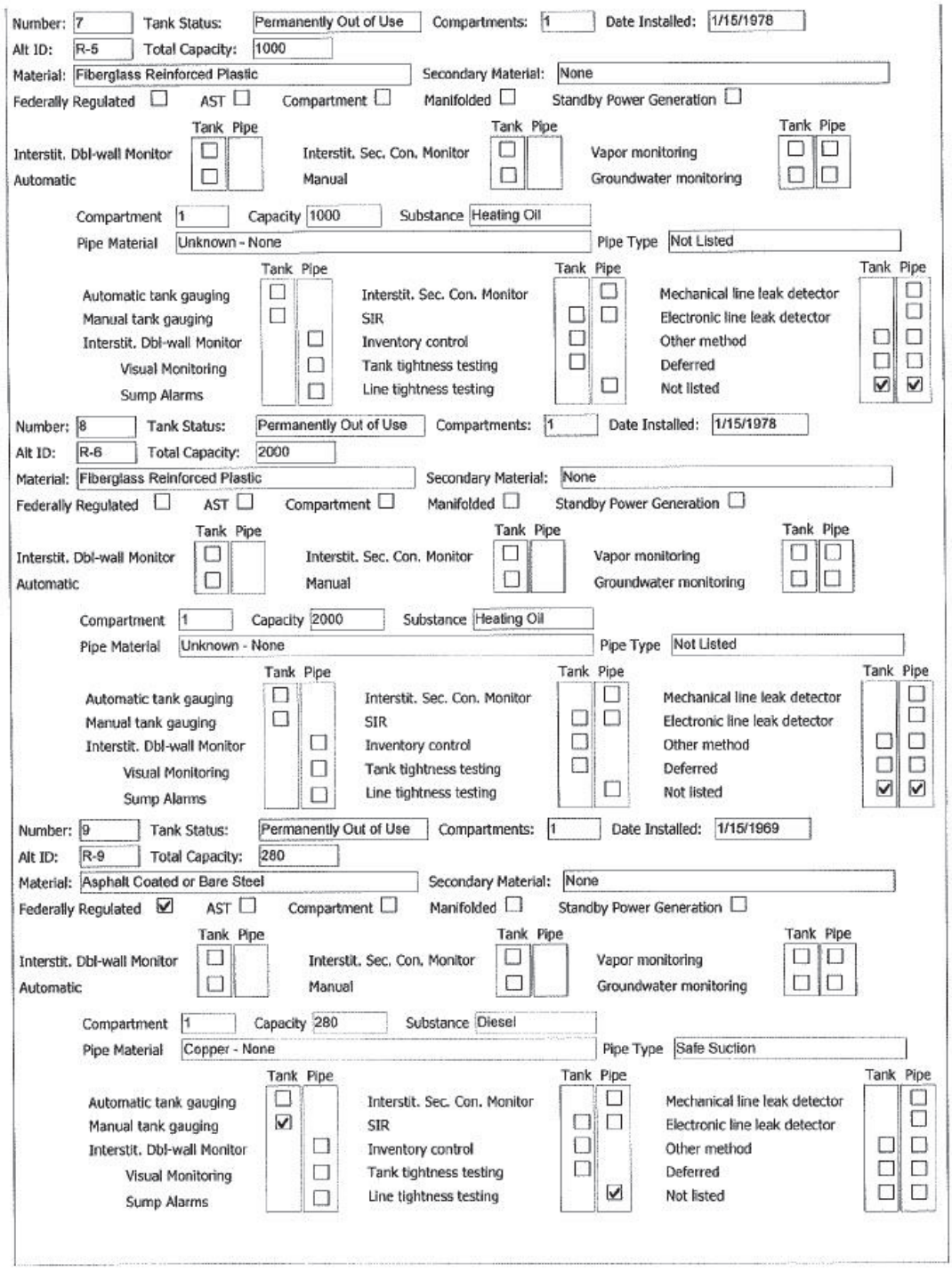
	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor		☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 6 Tank Status: Permanently Out of Use Compartments: 1 Date Installed: 1/15/1978
Alt ID: R-4 Total Capacity: 550
Material: Fiberglass Reinforced Plastic Secondary Material: None
Federally Regulated ☐ AST ☐ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 550 Substance Heating Oil
Pipe Material Unknown - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor		☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑



Number: 7 Tank Status: Permanently Out of Use Compartments: 1 Date Installed: 1/15/1978
Alt ID: R-5 Total Capacity: 1000
Material: Fiberglass Reinforced Plastic Secondary Material: None
Federally Regulated ☐ AST ☐ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 1000 Substance Heating Oil
Pipe Material Unknown - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor	☐	☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 8 Tank Status: Permanently Out of Use Compartments: 1 Date Installed: 1/15/1978
Alt ID: R-6 Total Capacity: 2000
Material: Fiberglass Reinforced Plastic Secondary Material: None
Federally Regulated ☐ AST ☐ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 2000 Substance Heating Oil
Pipe Material Unknown - None Pipe Type Not Listed

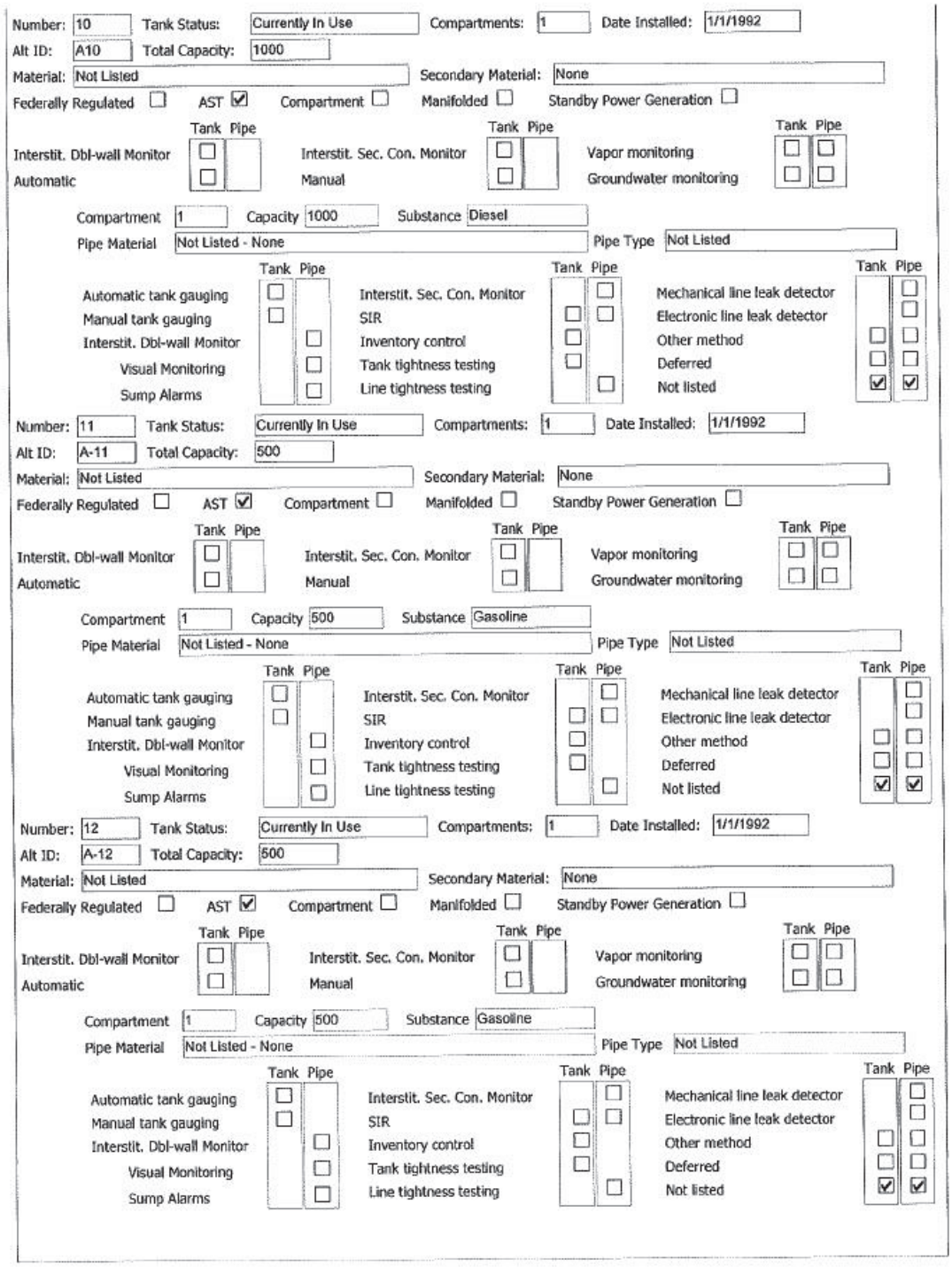
	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor	☐	☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 9 Tank Status: Permanently Out of Use Compartments: 1 Date Installed: 1/15/1969
Alt ID: R-9 Total Capacity: 280
Material: Asphalt Coated or Bare Steel Secondary Material: None
Federally Regulated ☑ AST ☐ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 280 Substance Diesel
Pipe Material Copper - None Pipe Type Safe Suction

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor	☐	☐	Mechanical line leak detector		☐
Manual tank gauging	☑		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☑	Not listed	☐	☐



Number: 10 Tank Status: Currently In Use Compartments: 1 Date Installed: 1/1/1992
Alt ID: A10 Total Capacity: 1000
Material: Not Listed Secondary Material: None
Federally Regulated ☐ AST ☑ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 1000 Substance Diesel
Pipe Material Not Listed - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐	☐	Interstit. Sec. Con. Monitor	☐	☐	Mechanical line leak detector	☐	☐
Manual tank gauging	☐	☐	SIR	☐	☐	Electronic line leak detector	☐	☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 11 Tank Status: Currently In Use Compartments: 1 Date Installed: 1/1/1992
Alt ID: A-11 Total Capacity: 500
Material: Not Listed Secondary Material: None
Federally Regulated ☐ AST ☑ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 500 Substance Gasoline
Pipe Material Not Listed - None Pipe Type Not Listed

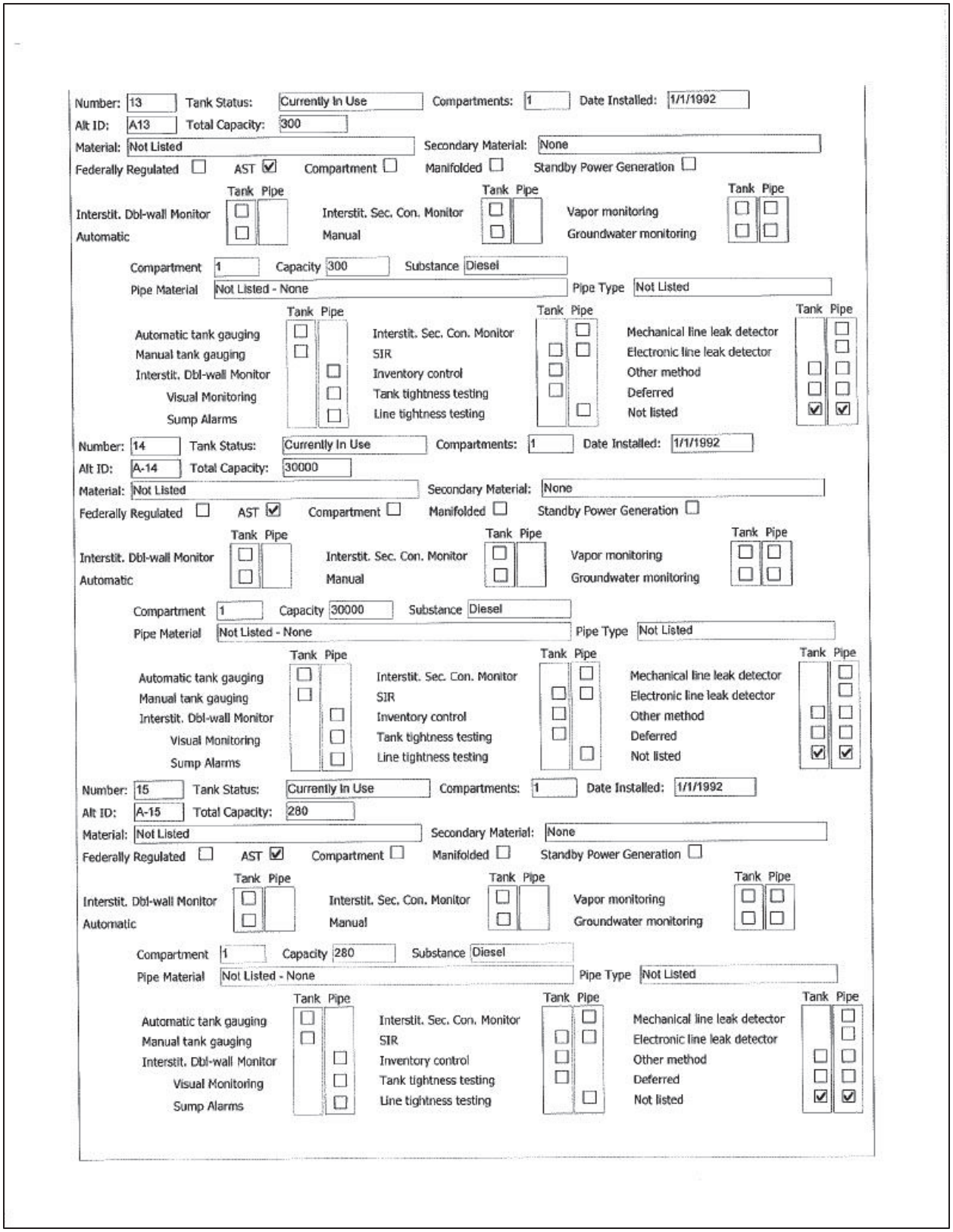
	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐	☐	Interstit. Sec. Con. Monitor	☐	☐	Mechanical line leak detector	☐	☐
Manual tank gauging	☐	☐	SIR	☐	☐	Electronic line leak detector	☐	☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 12 Tank Status: Currently In Use Compartments: 1 Date Installed: 1/1/1992
Alt ID: A-12 Total Capacity: 500
Material: Not Listed Secondary Material: None
Federally Regulated ☐ AST ☑ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 500 Substance Gasoline
Pipe Material Not Listed - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐	☐	Interstit. Sec. Con. Monitor	☐	☐	Mechanical line leak detector	☐	☐
Manual tank gauging	☐	☐	SIR	☐	☐	Electronic line leak detector	☐	☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑



Number: 13 Tank Status: Currently In Use Compartments: 1 Date Installed: 1/1/1992
Alt ID: A13 Total Capacity: 300
Material: Not Listed Secondary Material: None
Federally Regulated ☐ AST ☑ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 300 Substance Diesel
Pipe Material Not Listed - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor		☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR		☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 14 Tank Status: Currently In Use Compartments: 1 Date Installed: 1/1/1992
Alt ID: A-14 Total Capacity: 30000
Material: Not Listed Secondary Material: None
Federally Regulated ☐ AST ☑ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 30000 Substance Diesel
Pipe Material Not Listed - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor		☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR		☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 15 Tank Status: Currently In Use Compartments: 1 Date Installed: 1/1/1992
Alt ID: A-15 Total Capacity: 280
Material: Not Listed Secondary Material: None
Federally Regulated ☐ AST ☑ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 280 Substance Diesel
Pipe Material Not Listed - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor		☐	Mechanical line leak detector		☐
Manual tank gauging	☐		SIR		☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Number: 16 Tank Status: Currently In Use Compartments: 1 Date Installed: 1/1/1992
Alt ID: A-16 Total Capacity: 280
Material: Not Listed Secondary Material: None
Federally Regulated ☐ AST ☑ Compartment ☐ Manifolded ☐ Standby Power Generation ☐

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Interstit. Dbl-wall Monitor	☐		Interstit. Sec. Con. Monitor	☐		Vapor monitoring	☐	☐
Automatic	☐		Manual	☐		Groundwater monitoring	☐	☐

Compartment 1 Capacity 280 Substance Diesel
Pipe Material Not Listed - None Pipe Type Not Listed

	Tank	Pipe		Tank	Pipe		Tank	Pipe
Automatic tank gauging	☐		Interstit. Sec. Con. Monitor		☐	Mechanical line eak detector		☐
Manual tank gauging	☐		SIR	☐	☐	Electronic line leak detector		☐
Interstit. Dbl-wall Monitor		☐	Inventory control	☐		Other method	☐	☐
Visual Monitoring		☐	Tank tightness testing	☐		Deferred	☐	☐
Sump Alarms		☐	Line tightness testing		☐	Not listed	☑	☑

Dispenser

Number 1
Alternate ID 1/2
Dispenser Status Currently In Use
UDC No
Received Date
Comments

Release Detection UDC UDC
Interstit. Dbl-wall Monitor ☐
UDC Tightness Testing ☐
Release Comments

Status / Construction of UDC
Installation Date
Closure Date
Total Capacity 0
Material
Secondary Material None
Material Comments

UDC Meets 2009 N.D.A.C Requirements ☐
Single Hose Dispenser ☐
Credit Card / Cardtrol Only ☐
Blender Dispenser ☐
Satellite Dispenser ☐

Contacts

Name/ Address	City State Zip/ Phone	Email/ Status	Operator	Manager	Outreach	Corrective	DSR	Location	Other
Mr. Scott C Hopfauf 3401 24 St SW	Center ND 58530- 7017947220	shopfauf@minnkota.com Active	☑	☐	☐	☐	☑	☐	☐
Tony J Aman PO Box127	Center ND 58530- 7017947237	taman@minnkota.com Active	☑	☐	☐	☐	☐	☐	☐
Kevin Thomas 3401 24th St SW	Center ND 58530- 7017947278	kthomas@minnkota.com Inactive	☐	☐	☐	☐	☐	☐	☑ Plant Super
Mr Mike A Tietz 3401 24th St SW	Center ND 58530- 7017947266	MTietz@minnkota.com Inactive	☐	☐	☐	☐	☐	☐	☑ Permitting & Compliance En

Testing

	Test Type	Date	Company	Docs Received	Result
Tank: 1 Comp: 1	Tightness	09/29/2009		☑	Pass
	Tightness	09/29/2009		☑	Pass
	Tightness	10/11/2012	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	10/11/2012	Valley Electric & Petroleum Equip	☑	Pass

	Tightness	10/16/2013		☑	Pass
	Tightness	10/16/2013		☑	Pass
	Tightness	10/19/2015	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	10/19/2015	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	10/18/2016	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	10/18/2016	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	09/27/2017	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	09/27/2017	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	09/25/2018	Valley Electric & Petroleum Equip	☑	Pass
	LLD	09/25/2018	Valley Electric & Petroleum Equip	☑	Pass
	LLD	09/25/2018	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	09/25/2018	Valley Electric & Petroleum Equip	☑	Pass
	LLD	09/18/2019	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	09/18/2019	Valley Electric & Petroleum Equip	☑	Pass
	LLD	09/18/2019	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	09/18/2019	Valley Electric & Petroleum Equip	☑	Pass
	Tightness	09/17/2020	Tanknology	☑	Pass
	LLD	09/17/2020	Tanknology	☑	Pass
	LLD	09/17/2020	Tanknology	☑	Pass
	Tightness	09/17/2020	Tanknology	☑	Pass

LUST

Date	Current Status	How Found	Reporting Party	Inspector	Comment
12/17/1991	Site Cleanup Complet		David J Swiflick	David Swlick	Contaminated Soil was Removed; Amount = 5; City = Center; Land Farm;

Fuel Sample

Correspondence

Type Date	Compliance	Fuel Sample	Inspection	LUST	DSR	Staff Contact	RE File	Dept Initiated	Description
Reports 05/20/2021	☐	☐	☑	☐	☐	LeonVetter Stephanie	UST 46 Inspection Report UST 46 20210518 Closure Inspection.pdf	☑	Filed Inspection Report
EMail 01/01/2021	☐	☐	☐	☐	☐	System COC Contact	Testing Reminder Email UST 46 20210406 Reminder Email.pdf	☑	ram Region #4– UST system testing OVERDUE – Enforc
QuickNote 11/18/2020	☐	☐	☐	☐	☐	LeonVetter Leon Vetter	UST 46 20201118 QuickNote UST 46 20201118 QuickNote.pdf	☐	Water in tank
EMail 10/01/2020	☐	☐	☐	☐	☐	System COC Contact	Testing Reminder Email UST 46 20201016 Reminder Email.pdf	☑	ram Region #4– UST system testing OVERDUE
Email 07/08/2020	☐	☐	☐	☐	☐	LeonVetter Tony J Aman	UST 46 UST 46 20200708 Compliance Inspection Email.pdf	☐	Sent Compliance Inspection Request Email
Email 05/21/2020	☐	☐	☐	☐	☐	LeonVetter Scott C Hopfauf	UST 46 UST 46 20200521 Compliance Inspection Email.pdf	☐	Sent Compliance Inspection Request Email
DSR 02/27/2020	☐	☐	☐	☐	☐	LeonVetter Kevin Thomas	UST 46 UST 46 20200227 COC Doc1.pdf	☐	Received 2019 COC Supporting Documents
DSR 02/27/2020	☐	☐	☐	☐	☑	LeonVetter Kevin Thomas	UST 46 UST 46 20200227 COC Certificate.pdf	☐	Sent 2019 COC Certificate
Letter 01/17/2020	☐	☐	☐	☐	☑	LeonVetter Kevin Thomas	COC Questionnaire - 2019	☑	Sent COC Form (System) 2019
EMail 11/01/2019	☐	☐	☐	☐	☐	System COC Contact	Testing Reminder Email UST 46 20191105 Reminder Email.pdf	☑	ram Region #4– UST system testing OVERDUE

Reports 11/01/2019	☐ ☐ ☐ ☐ ☐	Robin A Schiermeister Thomas Mortrud	UST 46 20191101 2019 MLLD And ELL UST 46 20191101 2019 MLLD And ELLD Test 74715.pdf	☐ 2019 MLLD And ELLD Test
EMail 10/01/2019	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20191002 Reminder Email.pdf	☑ UST system testing OVERDUE
EMail 07/01/2019	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20190703 Reminder Email.pdf	☑ UST system testing DUE
DSR 02/12/2019	☐ ☐ ☐ ☐ ☐	LeonVetter Kevin Thomas	UST 46 UST 46 20190212 COC Doc1.pdf	☐ Received 2018 COC Supporting Documents
DSR 02/12/2019	☐ ☐ ☐ ☐ ☑	LeonVetter Kevin Thomas	UST 46 UST 46 20190212 COC Certificate.pdf	☐ Sent 2018 COC Certificate
Letter 01/14/2019	☐ ☐ ☐ ☐ ☑	LeonVetter Scott C Hopfauf	COC Questionnaire - 2018	☑ Sent COC Form (System) 2018
EMail 01/01/2019	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20190102 Reminder Email.pdf	☑ UST system testing DUE
Reports 09/26/2018	☐ ☐ ☐ ☐ ☐	Carl E Ness	UST 46 20180926 Line Tightness and UST 46 20180926 Line Tightness and MLD tests 65102.pdf	☐ Line Tightness and MLD tests
Email 07/19/2018	☐ ☐ ☐ ☐ ☐	DaveCameron Scott Hopfauf	Approve Operator Updates	☑ Sent Approve Operator Updates Email
DSR 03/15/2018	☐ ☐ ☐ ☐ ☑	LeonVetter Kevin Thomas	UST 46 UST 46 20180315 COC Certificate.pdf	☐ Sent 2017 COC Certificate
EMail 02/01/2018	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20180201 Reminder Email.pdf	☑ UST system testing OVERDUE – Enforcement action
Letter 01/26/2018	☐ ☐ ☐ ☐ ☑	LeonVetter Kevin Thomas	COC Questionnaire - 2017	☑ Sent COC Form (System) 2017
EMail 11/01/2017	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20171101 Reminder Email.pdf	☑ UST system testing OVERDUE
EMail 10/01/2017	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20171002 Reminder Email.pdf	☑ UST system testing DUE
Complnc Test 09/27/2017	☐ ☐ ☐ ☐ ☐	LeonVetter	UST 46 20170927 LTT and ALLD tests UST 46 20170927 LTT and ALLD tests 52368.pdf	☐ LTT and ALLD tests
Complnc Test 09/25/2017	☐ ☐ ☐ ☐ ☐	LeonVetter	UST 46 20170925 LTT results 50893.p UST 46 20170925 LTT results 50893.pdf	☐ LTT results
EMail 09/01/2017	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20170901 Reminder Email.pdf	☑ UST system testing DUE
EMail 08/01/2017	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20170801 Reminder Email.pdf	☑ UST system testing DUE
DSR 02/21/2017	☐ ☐ ☐ ☐ ☐	LeonVetter Kevin Thomas	UST 46 UST 46 20170221 COC Doc1.pdf	☐ Received 2016 COC Supporting Documents
DSR 02/21/2017	☐ ☐ ☐ ☐ ☑	LeonVetter Kevin Thomas	UST 46 UST 46 20170221 COC Certificate.pdf	☐ Sent 2016 COC Certificate
Letter 02/03/2017	☐ ☐ ☐ ☐ ☑	LeonVetter Kevin Thomas	COC Questionnaire - 2016	☑ Sent 2016 COC Form (System)
Complnc Test 10/18/2016	☐ ☐ ☐ ☐ ☐	Leon J Vetter	UST 46 UST 46 20161018 ltt and atg results.pdf	☐ ltt and atg results
EMail 10/01/2016	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20161005 Reminder Email.pdf	☑ UST system testing DUE
EMail 09/01/2016	☐ ☐ ☐ ☐ ☐	System COC Contact	Testing Reminder Email UST 46 20160907 Reminder Email.pdf	☑ UST system testing DUE

EMail 08/01/2016	☐☐☐☐☐	System COC Contact	Testing Reminder Email UST 46 20160907 Reminder Email.pdf	☑ UST system testing DUE
DSR 02/19/2016	☐☐☐☐☐	LeonVetter Kevin Thomas	UST 46 UST 46 20160219 COC Doc1.pdf	☐ Received 2015 COC Supporting Documents
DSR 02/19/2016	☐☐☐☐☑	LeonVetter Kevin Thomas	UST 46 UST 46 20160219 COC Certificate.pdf	☐ Sent 2015 COC Certificate
Letter 02/03/2016	☐☐☐☐☑	dohustowner Kevin Thomas	COC Questionnaire - 2015	☑ Sent COC Form (System) 2015
Email 08/20/2015	☐☐☐☐☐	LeonVetter Mike Tletz	Approve New Operator	☑ Sent Approve New Operator Email
DSR 03/16/2015	☐☐☐☐☐	LeonVetter Kevin Thomas	UST 46 UST 46 20150316 COC Doc1.pdf	☐ Received 2014 COC Supporting Documents
DSR 03/16/2015	☐☐☐☐☑	LeonVetter Kevin Thomas	UST 46 UST 46 20150316 COC Certificate.pdf	☐ Sent 2014 COC Certificate
Letter 03/02/2015	☐☐☐☐☑	DOHUSTowner Kevin Thomas	COC Questionnaire - 2014	☑ Sent COC Form (System) - 2014
DSR 08/25/2014	☐☐☐☐☐	LeonVetter Kevin Thomas	UST 46 UST 46 20140825 COC Doc1.pdf	☐ Received 2013 COC Supporting Documents
DSR 08/25/2014	☐☐☐☐☐	LeonVetter Kevin Thomas	UST 46 UST 46 20140825 COC Doc2.pdf	☐ Received 2013 COC Supporting Documents
Letter 08/06/2014	☐☐☐☐☑	CarlNess Craig Bleth	COC Questionnaire - 2013	☑ Sent COC Form (System) 2013
Maps 04/19/2013	☐☐☐☐☐	Leon J Vetter	UST 46 UST 46 20130419 site map google earth.jpg	☐ site map google earth
Other 03/08/2013	☐☐☐☐☑	Leon J Vetter	UST 46 UST 46 20130308 2012 COC.pdf	☐ 2012 COC
Letter 02/22/2013	☐☐☐☐☑	DOHUSTOwner Craig Bleth	COC Questionnaire - 2012	☑ Sent 2012 COC Form (System)
Email 07/11/2012	☐☐☐☐☐	LeonVetter Tony Aman	Approve New Operator	☑ Sent Approve New Operator Email
Email 07/11/2012	☐☐☐☐☐	LeonVetter Scott Hopfauf	Approve New Operator	☑ Sent Approve New Operator Email
Other 06/27/2012	☐☐☐☐☐	Leon J Vetter	UST 46 UST 46 20120627 2011 COC and documents.pdf	☐ 2011 COC and documentation
Letter 07/29/2011	☐☐☐☑☐	Leon J Vetter	UST 46 UST 46 20110729 ltr.pdf	☐ petroleum contaminated soil
Other 02/08/2011	☐☐☐☐☐	Leon J Vetter	UST 46 20110208 Various documents UST 46 20110208 Various documents 1984 -2011 87418.pdf	☐ Various documents 1984 -2011
Reports 09/20/1994	☐☐☐☐☐	Alison Harries	UST 46 19940920 WQ Release Summa UST 46 19940920 WQ Release Summary Report 84470.pdf	☐ WQ Release Summary Report
Other 08/03/1994	☐☐☐☐☐	Leon J Vetter	UST 46 UST 46 19940803 suspected release.pdf	☐ UST suspected release
Reports 12/17/1991	☐☐☐☐☐	Leon J Vetter	UST 46 UST 46 19911217 UST removal report with associated documents.pdf	☐ UST removal report and associated documents
Notification 12/17/1991	☐☐☐☐☐	Leon J Vetter	UST 46 UST 46 19911217 SFN 10980 Notification Form.pdf	☐ SFN 10980 Notification Form

Inspections

Date	Type	Inspector	Contact	Comment

05/18/2021	Closure	Leon Vetter	Stephanie	
07/16/2020	Routine	Leon Vetter		Had all LD records. Spill/overfll good. CP good. They are thinking of removing tank.
09/27/2016	Routine	Leon Vetter	Scott Hopfauf	Have flapper valve in drop tube.
09/25/2013	Routine	Leon Vetter	Scott Hopfauf	Had all records. Pump in uncontained sump.
05/24/2010	Routine	Carl Ness	Scott Hopfauf	
06/22/2006	Routine	Carl Ness	Not Entered	Inp Carl

Compliance History

Date From Date To	Facility Name Facility Location	Description
03/23/2011	(1276) Minnkota Power Cooperative Inc - (46) Minnkota Power Cooperative Inc 3401 24th Street SW, Center ND 58530	System Conversion

LUST Form Report

Tuesday, September 5, 2023

Facility Name Minnkota Power Cooperative Inc
Address 3401 24th St SW
City State Zip Center, ND 58530-
Phone (701) 794-8711 **Facility ID** 46
Comments Contaminated Soil was Removed; Amount = 5; City = Center; Land Farm;

LUST ID 46
LUST Standing Inactive
Date 12/17/1991
Status Site Cleanup Completed
Staff Lead David Swlick
Lead Party RP-Lead
AST or Exempt ☐

Status

Date	Status/Lead Party	Priority	Comments
12/18/1991	Site Cleanup Completed RP-Lead	50	Approximately 5 yards of contaminated sand fill removed.
12/17/1991	Tank Release Under Control RP-Lead	29	Contamination confined to sandfill.
12/17/1991	LUST Cleanup Initiated: Petroleum RP-Lead	27	Contaminated sand backfill removed.
12/17/1991	Confirmed Release RP-Lead	19	Petroleum contamination detected during ust removal.
12/17/1991	Routine Removal : Petroleum RP-Lead	18	280 gallon diesel ust removed.

Reporting Party

Party Type: State Official
Title: Env. Engineer
Name: David J Switlick
Company:
Address: 918 E Divide Avenue
City State Zip: Bismarck ND 58502 -
Phone:)

How was release first discovered?

Comments: Contamination discovered removal

Responsible Party

Release Information

Tank Number 0001 Alt Tank ID 1 Tank Status Permanently Out of Use

Source(s) of Release	Spill	Overfill	Phys/Mech Damage	Corrosion	Install Problem	Other	Unknown
Tank	☐	☐	☐	☐	☐	☐	☐
Pipe	☐	☐	☐	☐	☐	☐	☐
Dispenser	☐	☐	☐	☐	☐	☐	☐
Turbine Pump	☐	☐	☐	☐	☐	☐	☐
Delivery Problem	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

Qty Lost: g
How Discovered:
Date Discovered: 12/17/1991
Company: 0
Comments: This record was added after conversion.

Tank Number 0002 Alt Tank ID E-7 Tank Status Currently In Use

Source(s) of Release	Spill	Overfill	Phys/Mech Damage	Corrosion	Install Problem	Other	Unknown
Tank	☐	☐	☐	☐	☐	☐	☐
Pipe	☐	☐	☐	☐	☐	☐	☐
Dispenser	☐	☐	☐	☐	☐	☐	☐
Turbine Pump	☐	☐	☐	☐	☐	☐	☐
Delivery Problem	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

Qty Lost g | How Discovered | Date Discovered 12/17/1991
Company 0
Comments: This record was added after conversion.

Tank Number 0003 Alt Tank ID E-8 Tank Status Currently In Use

Source(s) of Release	Spill	Overfill	Phys/Mech Damage	Corrosion	Install Problem	Other	Unknown
Tank	☐	☐	☐	☐	☐	☐	☐
Pipe	☐	☐	☐	☐	☐	☐	☐
Dispenser	☐	☐	☐	☐	☐	☐	☐
Turbine Pump	☐	☐	☐	☐	☐	☐	☐
Delivery Problem	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

Qty Lost g | How Discovered | Date Discovered 12/17/1991
Company 0
Comments: This record was added after conversion.

Tank Number 0004 Alt Tank ID R-2 Tank Status Permanently Out of Use

Source(s) of Release	Spill	Overfill	Phys/Mech Damage	Corrosion	Install Problem	Other	Unknown
Tank	☐	☐	☐	☐	☐	☐	☐
Pipe	☐	☐	☐	☐	☐	☐	☐
Dispenser	☐	☐	☐	☐	☐	☐	☐
Turbine Pump	☐	☐	☐	☐	☐	☐	☐
Delivery Problem	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

Qty Lost g | How Discovered | Date Discovered 12/17/1991
Company 0
Comments: This record was added after conversion.

Tank Number 0005 Alt Tank ID R-3 Tank Status Permanently Out of Use

Source(s) of Release	Spill	Overfill	Phys/Mech Damage	Corrosion	Install Problem	Other	Unknown
Tank	☐	☐	☐	☐	☐	☐	☐
Pipe	☐	☐	☐	☐	☐	☐	☐
Dispenser	☐	☐	☐	☐	☐	☐	☐
Turbine Pump	☐	☐	☐	☐	☐	☐	☐
Delivery Problem	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

Qty Lost g | How Discovered | Date Discovered 12/17/1991
Company 0
Comments: This record was added after conversion.

Tank Number 0006 Alt Tank ID R-4 Tank Status Permanently Out of Use

Source(s) of Release	Spill	Overfill	Phys/Mech Damage	Corrosion	Install Problem	Other	Unknown
Tank	☐	☐	☐	☐	☐	☐	☐
Pipe	☐	☐	☐	☐	☐	☐	☐
Dispenser	☐	☐	☐	☐	☐	☐	☐
Turbine Pump	☐	☐	☐	☐	☐	☐	☐
Delivery Problem	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

Qty Lost g | How Discovered | Date Discovered 12/17/1991
Company 0
Comments: This record was added after conversion.

Tank Number 0007 Alt Tank ID R-5 Tank Status Permanently Out of Use

Source(s) of Release	Spill	Overfill	Phys/Mech Damage	Corrosion	Install Problem	Other	Unknown
Tank	☐	☐	☐	☐	☐	☐	☐
Pipe	☐	☐	☐	☐	☐	☐	☐
Dispenser	☐	☐	☐	☐	☐	☐	☐
Turbine Pump	☐	☐	☐	☐	☐	☐	☐
Delivery Problem	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

Qty Lost: g | How Discovered: | Date Discovered: 12/17/1991
Company: 0
Comments: This record was added after conversion.

Tank Number 0008 Alt Tank ID R-6 Tank Status Permanently Out of Use

Source(s) of Release	Spill	Overfill	Phys/Mech Damage	Corrosion	Install Problem	Other	Unknown
Tank	☐	☐	☐	☐	☐	☐	☐
Pipe	☐	☐	☐	☐	☐	☐	☐
Dispenser	☐	☐	☐	☐	☐	☐	☐
Turbine Pump	☐	☐	☐	☐	☐	☐	☐
Delivery Problem	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

Qty Lost: g | How Discovered: | Date Discovered: 12/17/1991
Company: 0
Comments: This record was added after conversion.

Tank Number 0009 Alt Tank ID R-9 Tank Status Permanently Out of Use

Source(s) of Release	Spill	Overfill	Phys/Mech Damage	Corrosion	Install Problem	Other	Unknown
Tank	☐	☐	☐	☐	☐	☐	☐
Pipe	☐	☐	☐	☐	☐	☐	☐
Dispenser	☐	☐	☐	☐	☐	☐	☐
Turbine Pump	☐	☐	☐	☐	☐	☐	☐
Delivery Problem	☐	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐	☐

Qty Lost: g | How Discovered: | Date Discovered: 12/17/1991
Company: 0
Comments: STAINING OBSERVED NEAR THE FILL PIPE, POSSIBLE OVERFILLS.; ROUTINE UST REMOVAL.

Receptor Information

Date	Offsite Receptor	Contaminant	Impact	Mitigated Date	Comment
12/17/1991	Tank Basin	Diesel	Unlikely	12/18/1991	Sand backfill in basin.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

September 19, 2023

Ref: 8ORA-N

Pierina N. Fayish
Department of Energy
National Energy Technology
Laboratory
626 Cochran Mill Road
Pittsburgh, PA 15236

Re: North Dakota CarbonSAFE: Project Tundra EA (DOE/EA-D2197)

Dear NEPA Compliance Officer Fayish,

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Energy's (DOE) August 2023 Draft Environmental Assessment (EA) for the proposed North Dakota CarbonSAFE: Project Tundra (hereinafter, "Project"). In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA), we are providing comments to convey additional resource management considerations that we recommend addressing in the Final EA.

The Project proposes to construct a carbon capture facility at the Milton R. Young lignite-fired coal power plant (hereinafter, "plant") in Oliver County, North Dakota with an estimated carbon dioxide storage capacity of 4 million metric tons per year. To reach this storage potential the Project would include a 0.5-mile-long carbon dioxide flowline, up to three Class VI injection wells, up to two Class I disposal wells, and three monitoring wells on private land near the existing power plant.

Our detailed comments and recommendations for the EA are enclosed for your consideration. These comments focus on considerations regarding the operational life of the plant; the range of alternatives; analysis of greenhouse gas (GHG) emissions, impacts, and resiliency; and analysis of non-GHG air pollutant emissions.

We appreciate your consideration of our comments. If further explanation of these comments is desired, please contact me at (303) 312-6155 or mccoy.melissa@epa.gov. You may also contact Carolyn Gleason, Lead Reviewer for this project, at (303) 312-6441 or gleason.carolyn@epa.gov

The EPA is encouraging electronic submissions for all future NEPA notifications and document transmissions. The Final EA and any future DOE NEPA documents for EPA Region 8 review can be emailed to EPA-R8-NEPA@epa.gov.

Sincerely,

MELISSA MCCOY

Digitally signed by MELISSA MCCOY
Date: 2023.09.19 15:25:34 -06'00'

Melissa W. McCoy, Ph.D., J.D.
Manager, NEPA Branch
Office of the Regional Administrator

Enclosure

Enclosure -EPA Comments
North Dakota CarbonSAFE: Project Tundra EA

Operational Planning

7-1 According to the August 19, 2023, invitation to comment on the Project prepared by DOE, the Project as proposed would be the world's largest post-combustion carbon dioxide capture and sequestration effort if built. Due to this scale and the diverse funding necessary for the Project sequestration rates to become fully realized, continuity of operations at the plant is also important. We therefore recommend developing a discussion on the anticipated operational life of the plant and any reasonably foreseeable maintenance or infrastructural upgrades that would need to occur in order for the Project to meet its goals in the EA. This discussion should consider the potential implications of reasonably foreseeable future air quality and GHG regulations on coal-fired power plants on costs and continued operation of the plant. The potential environmental impacts related to these actions should also be explored in this discussion and in the resource analysis sections included in the Draft EA as applicable. Alternatively, the Final EA could consider a second No-Action Alternative that does not assume the units will continue operating indefinitely and may retire in the near future due to lifespan limits and potential air quality and GHG rules.

7-2 The federal funding decision being proposed may also impact the resources available to the Project proponents to facilitate its regular maintenance and may enable additional operational life for the plant beyond what its existing infrastructure would have otherwise allowed. This may create viability for coal-based power generation in this region that may disincentivize the development of alternative lower GHG-emitting technologies. These options may include natural gas-based power sources which produce fewer carbon dioxide emissions per kilowatt-hour or other less carbon intensive power sources such as biomass, hydro, solar, or wind.[1] We recommend discussing the general operational status of the plant in the Final EA and describing the alternative power generation options that could take its place. This would help illustrate to the public the comparative environmental advantage or disadvantage of supporting coal-based power generation in the region under the Project.

Range of Alternatives

7-3 Section 1.2 details that the CarbonSAFE funding program was developed to "fulfill the need for research into safe, efficient, and effective characterization and permitting of commercial-scale Carbon Capture, Utilization, and Storage projects." However, this need behind the program was not fully coordinated with the alternatives development process presented in the Draft EA. Instead, the NEPA document only explores the preferred Alternative and the No-Action Alternative because response to a funding application has been set as the Project purpose. This approach is discordant with the 2022 NEPA Implementing Regulations Revisions as the Council on Environmental Quality notes:

> "There may be times when an agency identifies a reasonable range of alternatives that includes alternatives—other than the no action alternative—that are beyond the goals of the applicant or outside the agency's jurisdiction because the agency concludes that they are useful for the agency decision maker and the public to make an informed decision. Always tailoring the purpose and need to an applicant's goals when considering a request for an authorization could prevent an

[1] https://www.eia.gov/tools/faqs/faq.php?id=74&t=11

7-3 cont'd | agency from considering alternatives that do not meet an applicant's stated goals, but better meet the policies and requirements set forth in NEPA and the agency's statutory authority and goals."[2]

7-4 | This approach is further exclusionary of the types of lower-GHG emission alternatives mentioned above which may be more efficient at mitigating the effects of climate change if their lower emission rates result in fewer fugitive emissions during the power production and carbon sequestration process. EPA therefore recommends that the Draft EA expand on DOE's alternatives development process to consider any potential alternatives that may be less environmentally impactful than the preferred alternative while allowing for the advancement or carbon sequestration technology in the region. If other alternatives were not deemed practicable then we also recommend explaining why they were eliminated from detailed study in this segment.

Greenhouse Gas Analysis

The life cycle assessment (LCA) estimates GHG emissions for the plant from the extraction and transportation of the coal to the facility (i.e., upstream emissions), combustion of the coal and fuel (i.e., plant emissions), and the transmission of electricity along transmissions lines (i.e., downstream emissions of sulfur hexafluoride). The LCA also estimates carbon dioxide emissions captured by the Project from the combustion of coal and fuel (i.e., plant emissions); direct emissions from startup, shutdown, and malfunctions of the carbon capture system; and losses of carbon dioxide from transmission along the flowline to the carbon capture plant (i.e., fugitive emissions).

7-5 | The analysis monetizes the climate damages associated with these GHG emissions using the Social Cost of Greenhouse Gases (SC-GHG) for the two alternatives presented in the Draft EA. Using the information provided, EPA was unable to replicate the SC-GHG values presented in Table 3-18. For transparency and replicability of results, we recommend providing a more detailed explanation of how the SC-GHG values were estimated and exactly which emissions are being valued. It would be helpful if the explanation clarifies the following:

- Whether the upstream emissions from coal and fuel extraction and transportation, and downstream emissions from electricity transmission, are the same in both scenarios.
- Whether the SC-GHG values for both scenarios include the social cost of other GHGs (e.g., methane and nitrous oxide).
- Whether the difference between the scenarios presented in Table 3-18 represents only the monetary damages of CO_2 emissions not captured by the Project under the No-Action Alternative.

7-6 | We also recommend including the 95th percentile of estimates based on the 3% discount rate in Table 3.17 in addition to the 2.5%, 3%, and 5% discount rates already included. This fourth estimate would clarify the SC-GHG analysis presented in the Draft EA by making it consistent with the Interagency Working Group on SC-GHG's *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis* (86 Fed. Reg. 7037, January 20, 2021).[3]

[2] https://www.govinfo.gov/content/pkg/FR-2022-04-20/pdf/2022-08288.pdf
[3] https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf

Climate Change

7-7 Consistent with Executive Order 14008 – *Tackling the Climate Crisis at Home and Abroad* (86 Fed. Reg. 7619, January 25, 2021)[4] – the EPA recommends that DOE further discuss the climate pollution and benefits resulting from the proposed action. The LCA suggests the plant contributes 3.23 CO_2e per kg of CO_2 sequestered by the Project. This is largely due to incorporation of the emissions from transmission and distribution, which would occur with or without the Project (Table 3-6). The EPA recommends DOE remove these emissions from the scope of the LCA or provide a more robust discussion justifying significant investment in a project that generates roughly three kg of CO_2e for every one kg sequestered. In

7-8 addition to the LCA, we recommend using the CEQ's *National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change*.[5] The CEQ issued this interim guidance to assist Federal agencies in assessing and disclosing climate impacts during environmental reviews. Based on this guidance, we recommend addressing the following for each alternative in the EA:

- Estimate GHG emissions in CO_2-equivalent terms and translating the emissions into equivalencies that are more easily understood by the public (e.g., annual GHG emissions from x number of motor vehicles, see https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator).
- Include a detailed discussion of the preferred alternatives' GHG emissions in the context of state, national and international GHG emissions reduction goals, including the U.S. 2030 Paris GHG reduction target in addition to the 2050 net-zero pathway.[6] This discussion should address how reasonably foreseeable GHG emissions associated with the Project may support these policies and goals and over what timescale. While this information was partially represented for the No-Action Alternative, the proposed action did not get the same level of effective comparison to these goals in the Draft EA.

7-9 We further recommend evaluating the Project on its potential resiliency through climate change. Climate change may cause more extreme weather events which challenge existing infrastructure and can create points of failure. In order to more effectively communicate the climate change resiliency planning that has already been considered in the Draft EA, we also recommend making the Emergency Remediation and Response Plan mentioned in Appendix F publicly accessible and available for comment under the current NEPA development process.

Air Resources

7-10 The Milton R. Young power plant is a 705 MW plant with two units. The source is a major stationary source subject to permitting requirements, noted in the Draft EA. However, the details of existing air emissions and impacts as well as any necessary modifications to the permit have not been included in the Draft EA. Additionally the parasitic load of the carbon capture system is listed in the Draft EA as being 1836 MW, greater than the plant capacity. Therefore, we have included recommendations to assist in characterizing the project and disclosing existing impacts and to what degree those impacts would change should the project be implemented.

[4] https://www.federalregister.gov/documents/2021/02/01/2021-02177/tackling-the-climate-crisis-at-home-and-abroad
[5] https://ceq.doe.gov/guidance/ceq_guidance_nepa-ghg.html
[6] https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/22/fact-sheet-president-biden-sets-2030-greenhouse-gas-pollution-reduction-target-aimed-at-creating-good-paying-union-jobs-and-securing-u-s-leadership-on-clean-energy-technologies/

Project Specifications

7-11 The Draft EA states that implementation of the project will require 1836 MW of electricity consumption and 600 gigajoules per day (GJ/day) of steam (see page 3-6). The EA does not detail the equipment and specifications for all equipment that will contribute to this plant parasitic load. One of the largest energy usages may be CO_2 compression. Therefore, we recommend including the specifications and energy usage of equipment that will be major contributors to the parasitic load. We also recommend verifying the overall load, cited above, since it is greater than 705 MW plant capacity.

7-12 For steam consumption, we recommend explaining whether or not the modification would diminish plant steam available for turbine generation. To put the value of steam needed into context we recommend explaining what amount of steam is generated by the boilers at Milton R. Young in the same context (units of measure) as that used for the steam needed for the project. This additional information will be helpful when assessing the validity of the description of plant requirements as well as informing the lifecycle assessment of the project.

Existing Conditions

7-13 We recommend the Final EA include existing background concentrations that were used in the ND air quality modeling study discussed in the Draft EA for the modification to the plant (see page 3-3). These background concentrations serve as the basis for the existing air quality near the plant.

7-14 The plant is an existing major stationary source under the Clean Air Act, with air quality permits. While the Draft EA mentions the title V operating permit (see page 3-3), it does not include relevant information from the permit, or other New Source Review (NSR) permits that would be relevant to the existing air quality impacts at the plant, such as the plant Potential to Emit (PTE) and any air quality modeling for the existing plant configuration. We recommend that the current title V Operating Permit and Statement of Basis (SOB) be included as an appendix to the Final EA and further characterization of existing plant emissions be included in the Final EA.

Environmental Consequences

7-15 We recommend that the Final EA discuss what activities would be necessary to construct the project. Based on the necessary construction, we recommend generating an equipment roster and schedule. Based on the intensity of emission generating activity, it may be appropriate to develop an emission inventory in order to inform any potential emission reduction strategies for substantially contributing emitting units.

7-16 The Draft EA discloses that modeling has been conducted that considers the addition of the project (see page 3-3 and 3-4). However, the details of the modeling analysis are not included in the EA. Additionally, Table 3-2 does not include the modeling results or background concentrations, but rather includes the source parameter inputs for the modeling. We recommend including the modeling results and the location(s) (receptor(s)) associated with the results. Because modeling analyses can be quite complex, we recommend including supporting information related to the modeling analysis as an appendix to the Final EA.

7-17 We recommend comparing the existing emissions from the plant to the projected emission profile should the project be constructed. Any reduction in emissions at the plant due to increased control resulting from the carbon capture system should be noted.

STATE HISTORICAL SOCIETY OF NORTH DAKOTA

HISTORY FOR everyone.

May 31, 2024

Pierina Fayish
National Energy Technology Laboratory
626 Corchrans Mill Road, PO. Box 10940
Pittsburgh, PA 15236

ND SHPO Ref: 24-0139 Milton Young Transmission Line Reroute Minnkota Power Cooperative in portions of [T141N R83W Sections 4, 5, and 8] Oliver County, North Dakota

Dear Pierina,

We reviewed the report for 24-0139 titled "Milton Young Transmission Line Reroute: A Class III Cultural Resource Inventory in Oliver County, North Dakota" from Juniper Environmental Consulting by Andrea Kulevsky and John Morrison. We find the report acceptable and will add it to our manuscript collection.

We concur with a determination of "No Historic Properties Affected" for the project provided the project takes place as described in the documentation and all borrow comes from an approved source.

Thank you for the opportunity to review this project. For future correspondence regarding this project, please include the ND SHPO Reference number indicated in this letter. If you have any questions, please contact Margie Patton, Research Archaeologist at 701-328-3576 or mmpatton@nd.gov.

Sincerely,

for William D. Peterson, PhD
State Historic Preservation Officer
(North Dakota)

24-0139

STATE HISTORICAL SOCIETY OF NORTH DAKOTA

HISTORY FOR everyone.

June 28, 2024

Pierina Fayish
National Energy Technology Laboratory
626 Corchrans Mill Road, PO. Box 10940
Pittsburgh, PA 15236

ND SHPO Ref: 23-0255 [Formerly 24-0195] Tundra Project Extra Workspaces as part of (Tundra) ND CarbonSAFE: Project Tundra in portions of [T141N R83W Sections 4, 5, and 8 and T142N R83W Sections 32, 33, and 34] Oliver County, North Dakota

Dear Pierina,

We reviewed the report for 23-0255 [Formerly 24-0195] titled "Tundra Project Extra Workspaces: A Class III Cultural Resource Inventory in Oliver County, North Dakota" from Juniper Environmental Consulting by Andrea Kulevsky and John Morrison. We find the report acceptable and will add it to our manuscript collection.

We concur with a determination of "No Historic Properties Affected" for the project provided 32OL960, 32OL961, 32OLX441, 32OLX442, and 32OL1008 are avoided as described in the consultation letter dated March 26, 2024 and provided the project takes place as described in the documentation.

Thank you for the opportunity to review this project. For future correspondence regarding this project, please include the ND SHPO Reference number indicated in this letter. If you have any questions, please contact Margie Patton, Research Archaeologist at 701-328-3576 or mmpatton@nd.gov.

Sincerely,

for William D. Peterson, PhD
State Historic Preservation Officer
(North Dakota)

23-0255