

EMERGENCY ACTION PLAN BOTTOM ASH POND NO. 2

Sherburne County (Sherco) Generating Plant
Northern States Power Company (dba Xcel Energy, Inc.)
Becker, Minnesota
Carlson McCain Project No.: 3404-19

Prepared for:



Xcel Energy, Inc.

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Emergency Action Plan
Bottom Ash Pond No. 2
Sherburne County Generating Plant

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Emergency Action Plan

Bottom Ash Pond No. 2

Sherburne County Generating Plant

1.1 Statement of Purpose

This plan defines responsibilities and provides procedures to identify unusual and unlikely conditions which may endanger the Sherco Bottom Ash Pond No. 2 and/or notify area residents and the appropriate public officials in time to take preventative measures.

1.2 Importance of the Emergency Action Plan

Because of the potential for significant consequences to property in the event of a dam failure, this Emergency Action Plan (EAP) should be followed carefully and regularly updated as per the requirements of the Minnesota Department of Natural Resources and the federal Final Coal Combustion Residuals Rule.

This EAP defines two potential dam safety emergency situations and outlines Xcel Energy's notification process and corresponding emergency operating procedures.

1.3 Introduction

The Bottom Ash Pond No. 2 (BAP2) is a "new coal combustion residual (CCR) surface impoundment" according to 40 CFR Section §257.53, located at the Sherburne County Generating Plant (Sherco) in Becker, Minnesota (see Figure 1). The BAP2 holds bottom ash and ash transport water generated by the operation of Sherco Units 1, 2 and 3, and is regulated under NPDES Permit No. MN0002186, State of Minnesota Dam Safety Permit No. 83-3022, and 40 CFR Part §257. This EAP:

- Describes events and circumstances involving the Sherco BAP2 that will constitute a safety emergency,
- Lists the actions to be taken in the event of a safety emergency, and
- Identifies the authorities to be contacted in an effort to minimize the loss of life and property damage.

1.4 Identified Events or Circumstances

40 CFR §257.74(a)(3)(i)(A) Define the events or circumstances involving the CCR unit that represent a safety emergency, along with a description of the procedures that will be followed to detect a safety emergency in a timely manner;

There are two potential scenarios involving the BAP2 that would constitute a safety emergency as defined by the final CCR rule.

- 1) The first scenario relates to ash transport water overtopping the BAP2 perimeter dikes. The lowest crest of the BAP2 perimeter dikes is at elevation 995 feet MSL. The operating water

level in the BAP2 will generally be held between elevations 965 and 989 feet MSL by the use of a motor operated valve installed on the discharge pipe in the discharge vault and controlled from the control room of Unit 3. A secondary pipe with an invert elevation of 989 feet MSL is located near the top of the embankment. This pipe is not valved and can handle all overflow if the lower pipe becomes inoperable.

The BAP2 will be inspected daily as part of routine shift rounds and weekly as part of routine CCR inspections. Any unusual increase in water level in the BAP2 caused by a plugging or failure of the discharge structure would be observed within 24 hours, making it extremely unlikely that the water level in the BAP2 could approach the crest of the perimeter dikes without advance notice.

- 2) The second scenario is the catastrophic release or potential release of BAP2 ash and/or ash transport water due to a structural failure of a BAP2 perimeter dikes. As described more fully in the September 2020 *Initial Structural Stability Assessment* for the BAP2, the BAP2 was designed and constructed, and is operated and maintained, in accordance with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded in the BAP2.

The BAP2 is inspected daily as part of routine shift rounds and weekly as part of routine CCR inspections. These inspections are intended to note the presence of uncontrolled erosion, animal burrowing, and other changes that may negatively affect the long-term structural integrity of the BAP2 dikes. Any deficiencies noted are prioritized for corrective action. A structural failure due to a chronic problem with the dike integrity is therefore unlikely. In the event of an acute event (earthquake, record precipitation, vandalism), the BAP2 will be inspected as soon as conditions are safe and practicable to look for any unusual change in dike geometry (e.g. slumping, bulging, wasting).

1.5 General Responsibilities

40 CFR §257.74(a)(3)(i)(B) Define responsible persons, their respective responsibilities, and notification procedures in the event of a safety emergency involving the CCR unit;

Initial Employee that Observes the Emergency or Incident

- Check scene for safety and hazards. If not safe, move to a safe area immediately and keep others from entering the hazardous area.
- Contact the Sherco Emergency Line from a facility telephone or from a cell phone. Provide a description of the location and nature of the emergency or incident, and whether there are any injuries or other immediate hazards.
- Begin administering first aid as appropriate.
- Refer all outside media inquiries regarding the emergency or incident to senior management or Xcel Energy Media Relations.

Sherco Shift Supervisor

- Obtain necessary information from the person reporting the emergency. (e.g., location and nature of emergency or incident, status of injuries, other associated hazards).
- Contact 8-911 for outside emergency assistance as needed. Provide the dispatcher details on the nature of the emergency. State that an emergency escort will meet the responders at the main Sherco entrance gate or an alternative gate if it provides better access.
- Assign a person to meet responders at the gate providing best access to the location of the emergency. Instruct the assigned person to contact you by radio/cell phone once in-place. If available, send extra escorts to help direct multiple response vehicles from the gate to the incident location, to control access at the gate, and to gates responders may mistakenly go to.
- Notify Xcel Environmental Services group either directly or via its 24-hour hotline. Follow-up directly with Xcel Environmental Services Manager responsible for ash operations and compliance.
- Report the emergency to Sherco Ash/Ash Water Ponds point of contact and provide a summary of the emergency.
- Key open the designated gate or contact Security Operations Center (SOC) to request opening of the designated gate.
- If applicable, direct responders to take the injured/ill person to the nearest hospital. Be sure to find out where they are taking the injured person.
- If applicable, non-serious injury/illness may be transported by Plant staff to hospital. For non-serious injuries/illnesses, Plant Superintendents, Managers, and/or Supervisors should take the injured/ill person to the hospital or designated clinic. If the need for medical attention is questionable, err on the conservative side and transport them to the hospital. For further instructions see Plant Management Directive (PMD) 5.1 Medical Emergencies and Incident Notification and the Sherco Injury Grab and Go Packet on the Sherco PMD web site or in Tab 5 of the Sherco Plant Emergency Action Plan.
- Refer all outside media inquiries regarding the emergency or incident to senior management or Xcel Energy Media Relations.
- Implement Emergency Operating Procedures and associated Plant EAPs.

Xcel Environmental Services

- Environmental Services staff or the Sherco Plant Environmental Analyst will contact the State of Minnesota Duty Officer immediately after being notified of the Sherco BAP2 emergency.
- Per the requirements of State of Minnesota Dam Safety Permit No. 83-3022, Environmental Services staff will contact the Director of the Minnesota Department of Natural Resources Division of Ecological and Water Resources immediately after being notified of the Sherco BAP2 emergency.
- Environmental Services staff shall orally notify the MPCA Commissioner within 24 hours of the discovery that a noncompliant condition has occurred which could endanger human health, public drinking water supplies, or the environment.

- Environmental Services staff shall submit to the MPCA Commissioner a written description of the noncompliance within five days of the discovery of the noncompliance. The written report shall include the cause of the noncompliance; the exact dates of the period of the noncompliance; if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
- In the event a release of ash and/or ash transport water from the BAP2 occurs, Environmental Services staff will work with MPCA representatives, Sherco onsite staff, and others as needed to develop and implement a sampling program designed to assess the potential impacts of the emergency on human health and the environment immediately following discovery of the emergency. Sampling results shall be submitted to MPCA with the next Discharge Monitoring Report unless directed otherwise by MPCA.

MPCA Duty Officer

The Minnesota Duty Officer Program provides a single answering point for local and state agencies to request state-level assistance for emergencies, serious accidents or incidents, or for reporting hazardous materials and petroleum spills. The duty officer is available 24 hours per day, seven days per week.

The Minnesota Duty Officer informs the Minnesota Homeland Security Emergency Management Agency Regional Representative, the Corps of Engineers Emergency Manager, the Minnesota Department of Natural Resources, the Minnesota Pollution Control Agency and other appropriate agencies.

The duty officer will gather information regarding the location and nature of the emergency or incident, assess the need for additional federal, state, or local government resources to aid the Company in responding to the emergency or incident, and then make the necessary calls and notifications to those resources to request assistance.

Sherco Onsite Representative

Staff available at Sherco to assist in the assessment, monitoring, and corrective action of an emergency condition at the BAP2 include:

- Steve Bluhm, Sherco – Sherco Performance Optimization – Reliability Engineering
- John Kaczmarek, Sherco – Plant Environmental Analyst
- John Hunt, Energy Supply Projects – Project Lead

Steve Bluhm or John Hunt can also contact external contractors as needed to request specialized labor and equipment to contain and recover materials released from the BAP2, or to address observed deficiencies in dike geometry that could lead to an emergency.

Xcel Energy Communications Department

The communications department is responsible for managing communications with the media.

1.6 Notification Procedures

40 CFR §257.74(a)(3)(i)(C) Provide contact information of emergency responders;

The top priority for this emergency response plan is the protection of human life. Staff responsible for notifications must use the notification checklist found in Appendix A. Staff implementing this checklist should be aware that the specific characteristics of the event may necessitate a deviation from the notification order identified. If a deviation should occur, it is critical that all of the parties identified are notified as needed.

Please note that a complete list of contacts, including internal and external resources, is found in Appendix B.

1.7 Maps Identifying Potentially Affected Areas

40 CFR §257.74(a)(3)(i)(D) Include a map which delineates the downstream area which would be affected in the event of a CCR unit failure and a physical description of the CCR unit; and

The BAP2 consists of an approximately 18-acre pond contained within composite-lined, compacted earthen embankments. A gravel driving surface extends around the top of the entire perimeter of the pond dikes. At maximum operating level, the BAP2 can contain 1.1 million cubic yards of CCR and CCR wastewater. As shown on Figure 2, the BAP2 abuts the eastern limit of the Bottom Ash Pond No. 1 and the northern limit of closed Scrubber Solids Pond No. 2.

A catastrophic failure of BAP2 perimeter dikes in any open direction (north or east) would require Sherco Units 1, 2, and 3 to be taken offline until the BAP2 could be repaired and placed back into service. In addition:

- A BAP2 dike failure to the east would not threaten any structures or surface waters, and would be contained entirely within Xcel property.
- Any release from the BAP2 to the north would be contained entirely within Xcel property. A BAP2 dike failure to the north could impact the Unit 1 Cooling Tower structure.

The areas that could be at risk of inundation in the event of a catastrophic failure of the BAP2 perimeter dikes are shown on Figure 2.

1.8 Outreach to Local Emergency Responders

40 CFR §257.74(a)(3)(i)(E) Include provisions for an annual face-to-face meeting or exercise between representatives of the owner or operator of the CCR unit and the local emergency responders.

Sherco management normally meets with representatives of the City of Becker on a monthly basis. Review and discussion of this EAP will be an annual agenda item for the April meeting.

1.9 EAP Maintenance

257.74(a)(3)(ii)(A) Amendment of the plan to incorporate changes.

This plan shall be amended, at a minimum, whenever there is a change in conditions that would substantially affect its effectiveness.

257.74(a)(3)(ii)(B) Routine evaluation of plan.

This EAP shall be evaluated, at a minimum, every five years to ensure that the information is accurate. As necessary, this EAP will be updated and revised to account for changes in operations or site conditions.

Sherco staff will also evaluate the effectiveness of this plan in the event that there is a documented release from the affected impoundments.

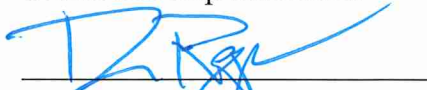
2.0 Emergency Operating Procedures

The two safety emergencies which may result in an uncontrolled release of CCR or CCR contact water to the environment from the Sherco BAP2 are the overtopping of the pond or a structural failure of the impoundment. Regardless of the cause, the following steps will be taken, as appropriate:

- A. **Pipe leak associated with CCR Unit:** In the event of a leak from a pipe that carries ash or ash contact water, the affected line will be removed from service and repaired. The scope and extent of the ash or ash contact water release will be evaluated and managed in accordance with an approved response plan as required by the CCR final rule or applicable state requirements.
- B. **High Pond Level:** In the unlikely event that the pond is overtopped or a structural failure results in uncontrolled release of CCR or contact water to environment, take actions to isolate systems that are adding additional materials to the pond and lower pond levels to extent feasible by transferring free liquids to another onsite pond permitted to accept this material.
- C. **Uncontrolled Release of CCR or Ash Contact Water to Environment:** In the event of an uncontrolled release of CCR or ash contact water to the environment, take defensive actions to stop or reduce release. Mobilize equipment to take defensive measures as conditions merit based upon safety and incident type to reduce the potential impacts to property and the environment. Once site conditions are stabilized and it is safe to do so, initiate cleanup activities. Engage Xcel Environmental Services and emergency response contractors as appropriate to conduct limited site investigation and conduct identified remediation activities.

Certification

I hereby certify under penalty of law that this report was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Daniel J. Riggs, PE
License No. 49559

September 29, 2020
Date

Appendix A – Notification Priority List

Name/Phone Number

1 Sherco Emergency Line (763-261-3200)

Tell them:

- Situation summary, including:
 - o Nature of Incident
 - o Location of incident
 - o Identify potential cause of incident
 - o What was impacted
 - o What was released
 - o Descriptions of any measures taken in response to incident
- Whether there are any injuries or other immediate hazards
- Whether assistance from local emergency responders is required
- Whether any systems or outfalls should be isolated

2 Sherburne County Emergency Response Office Dispatcher (8-911)

Tell them:

- Situation summary
- Ask them to evacuate downstream residents, if necessary
- Ask them to restrict access to impacted areas, if necessary

3 Xcel Energy Environmental Services Spill (612-330-5972)

Tell them:

- Situation summary
- Facility contact for follow up

4 Minnesota Duty Officer (800-422-0798)

Thresholds for notification of ash or ash contact water spill: greater than 400 gallons on land or greater than 5 gallons to surface water

Tell them:

- Situation summary
- Ask them to call the U.S. Homeland Security Emergency Management Representative, National Weather Service, U.S. Army Corps of Engineers, and Minnesota State Highway Patrol and inform them of the situation

5 Sherco Ash Management Staff

(Primary - Steve Bluhm; Office: 763-261-3133; Cell: 763-772-4249)

(Alternate – John Kaczmarek; Office: 763-261-3398; Cell: 320-286-5058)

Tell them:

- Situation summary
- Ask them to mobilize project manager to take over emergency response activities

6 Plant Management

(Primary – Mike Mitchell; Office: 763-261-3110; Cell: 763-370-7295)

(Secondary – Al Clitty; Office: 763-261-3168; Cell: 320-290-9618)

Tell them:

- Situation summary
- Ask them to contact senior management, if required
- Ask them to contact media relations, if required

7 Environmental Services Management

(Primary: 612-269-8997; Secondary: 612-269-9015)

Tell them:

- Situation summary
- Ask them to mobilize environmental staff, if required

8 Xcel Energy Communications Hotline
(24 hour number: 612-215-5300)

Tell them:

- Situation summary

Appendix B – Emergency Contact List

The following table presents a contact list for entities and individuals that will assist in responding in the event of a safety emergency or observation of conditions that suggest an emergency is imminent.

Organization/Name	Contact	Office	Cell
Emergency Notification			
Sherco Emergency Line		763-261-3200	
Sherco Shift Supervisor		763-261-3161	
Xcel Environmental Services	24-hour number	612-330-5972	
Xcel Security Operations Center (SOC)		612-330-6900	
Sherco Contacts			
Plant Director	Mike Mitchell	763-261-3110	763-370-7295
Sr. Operations Manager	Al Clitty	763-261-3168	320-290-9618
Ash/Ash Water Ponds	Steve Bluhm	763-261-3133	763-772-4249
	John Kaczmarek	763-261-3398	320-286-5058
	John Hunt	763-261-3508	763-242-2196
Xcel Environmental Services Management			
	Pat Flowers	612-330-6278	612-269-8997
	Jim Bodensteiner	612-330-6625	612-720-2492
	Jeff Berrington	612-330-7530	612-636-4103
Xcel Resources			
Media Relations Hotline		612-215-5300	
Claims Services		612-215-4512	
State Regulatory Contacts			
State of Minnesota Duty Officer	24-hour number	651-649-5451	
MnDNR Division of Ecological and Water Resources	Steve Colvin	651-259-5709	
MnDNR Dam Safety Engineer	Jason Boyle	651-259-5715	
MPCA NPDES Permit Engineer	Brian Schweiss	651-757-2709	
MPCA SW Permit Engineer	Daniel Aamodt	651-757-2435	
Local Government Contacts			
Sherburne County Solid Waste Administrator	David Lucas	651-765-4464	
City of Becker, City Administrator	Greg Pruszinske	763-200-4244	
External Resources		Services Provided	
Veit Companies – Mitch Sumstad	Earth Work	763-428-9594	612-490-7849
Rachel Contracting – Dave Lyste	Earth Work	763-424-1503	763-272-4379
Clean Harbors Environmental	On Water Response	507-263-0200	800-645-8265

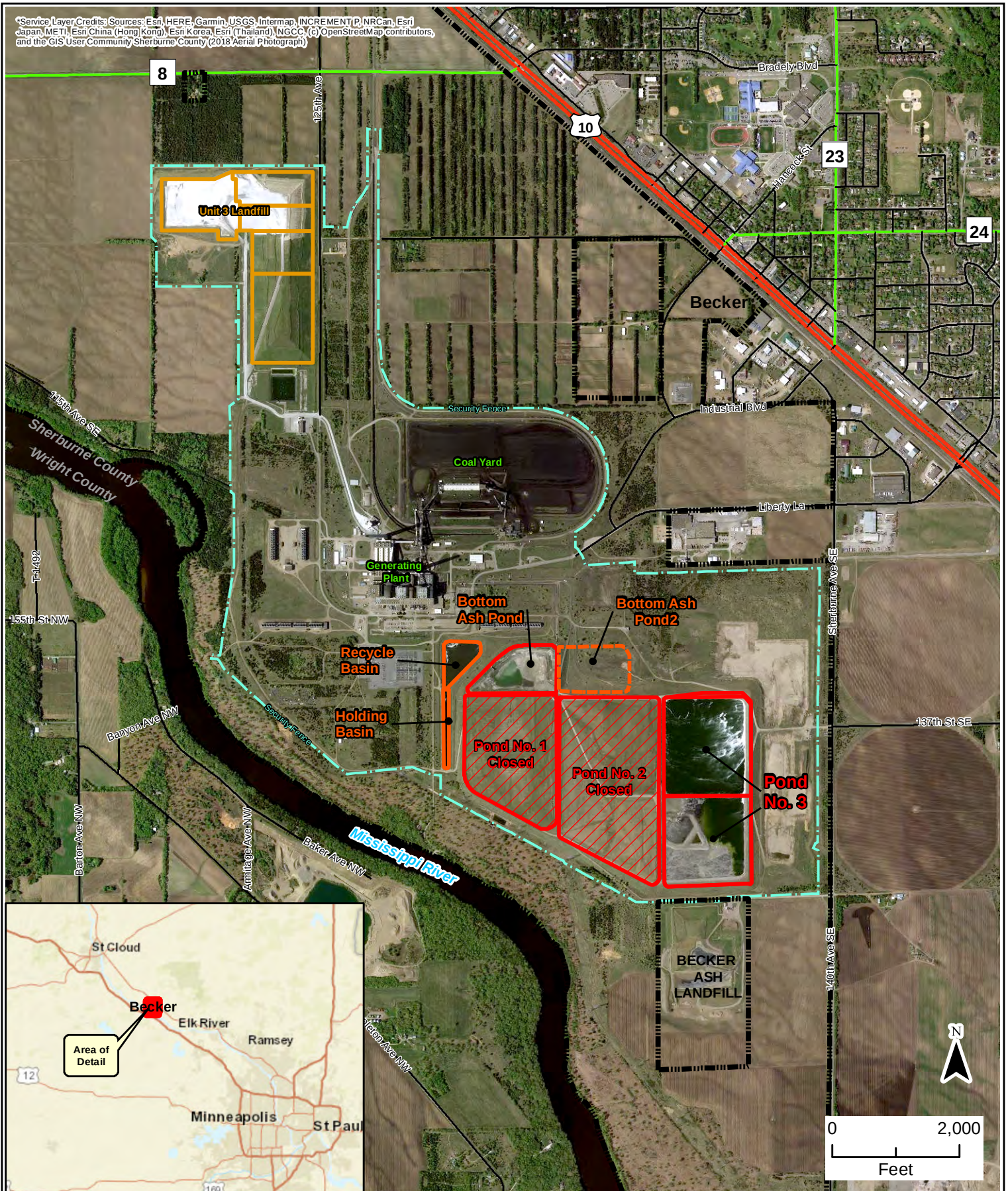
Appendix C – Figures



Photo 1 – BAP2 Liner Construction, looking Northwest (from Drone)



Photo 2 – Northeast corner of BAP2 during liner construction, looking southeast



EMERGENCY ACTION
PLAN
Bottom Ash Pond 2
Sherburne County Generating Plant
Becker, Minnesota

FIGURE 1
SITE LOCATION
MAP



EMERGENCY ACTION
PLAN
Bottom Ash Pond 2
Sherburne County Generating Plant
Becker, Minnesota

FIGURE 2
POTENTIAL BREACH
FLOODING AREAS