BASIN ELECTRIC POWER COOPERATIVE

1717 EAST INTERSTATE AVENUE
BISMARCK, NORTH DAKOTA 58503-0564
PHONE: 701-223-0441
FAX: 701-557-5336

August 25, 2011

Mr. Stephen Hoffman
US Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Coal Ash Site Assessment at Basin Electric Power Coop's – Antelope Valley Station

Dear Mr. Hoffman:

This letter is in response to the notification received on July 28, 2011, for the final report of the Specific Site Assessment for Coal Combustion Waste Impoundments at Basin Electric (BEPC) Antelope Valley Station. This report presents the results of a specific site assessment of coal combustion waste (CCW) impoundments at the Antelope Valley Station. The assessment was performed on October 19, 2010, by GEI Consultants, Inc.

The final report includes a specific condition rating for each CCR management unit and recommendations and actions that should be undertaken to ensure the stability of the CCR impoundments. BEPC intends to address each of the corrective measures as follows:

12.1 Corrective Measures and Analyses for the Structures

1. Erosion protection measures will be implemented by BEPC staff along the downstream slope of the SDA Decantation Pond in the form of grassy vegetation.

2-5. A geotechnical exploration program is currently contracted with AECOM of Green Bay, WI. This exploration program includes soils classification, index property and strength tests, slope stability analyses, liquefaction potential analysis, and hydrologic analysis.

12.2 Corrective Measures Required for Instrumentation and Monitoring Procedures.

Staff gages set to the vertical datum and continuous water level monitoring devices will be installed by BEPC staff.

12.3 Corrective Measures Required for Maintenance and Surveillance Procedures

BEPC has developed and implemented a brief daily check inspection of the facilities. BEPC will also develop and document informal annual inspections of the facilities by staff trained in dam safety evaluations; and have the facilities inspected every 5 years by a 3rd party professional engineer.

Each of these corrective measures will be implemented by September 1, 2012.

In addition, within Section 12.6 of the final report dated March 2011, the report has been sealed by a Colorado Professional Engineer. The report, recommendations, and associated inspections are on a facility located in North Dakota and should be sealed by a North Dakota Professional Engineer in accordance with North Dakota state law.

If you have any questions or comments, please let me know. I can be reached via email at mfluharty@bepc.com or by phone at 701-557-5688.

Sincerely,

Mike Fluharty
Vice President Plant Operations

/gmj
cc: John Jacobs
Mike Paul
Lyle Witham