

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

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**IN THE MATTER OF THE APPLICATION  
OF OTTER TAIL POWER COMPANY  
FOR AN ENERGY CONVERSION  
FACILITY PERMIT FOR THE  
CONSTRUCTION OF A COMBUSTION  
TURBINE GENERATOR AND  
ASSOCIATED INFRASTRUCTURE  
INCLUDING A NATURAL GAS PIPELINE  
AND ELECTRIC TRANSMISSION LINE  
NEAR ASTORIA, SOUTH DAKOTA**

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**OTTER TAIL POWER  
COMPANY'S RESPONSES TO  
STAFF'S THIRD SET OF  
DATA REQUESTS TO OTTER  
TAIL POWER COMPANY**

**EL17-042**

Otter Tail Power Company ("Otter Tail") for its non-confidential and public responses to Staff's Third Set of Data Requests to Otter Tail Power Company dated January 24, 2018, states as follows:

**Otter Tail is responding to data requests 3-1 through 3-3 as an entity, and the responses were collaboratively generated as a result of information being provided by multiple sources within Otter Tail. Additionally, although Otter Tail as a whole contributed to the drafting of the responses to the data requests, Mark Thoma, Manager of Environmental Services, had primary responsibility.**

- 3-1) Pursuant to ARSD 20:10:22:26, please provide an inventory of all materials flowing out of the proposed facility, including method of control, treatment, destination, and disposal monitoring programs of each of the materials. More specifically,
- a. Please identify if any regulated wastes will flow out of the proposed facility,
  - b. Please provide an overview of the waste management program Otter Tail will use to monitor and properly dispose of any regulated or industrial wastes.

**Response:**

- a. **Under normal operating conditions, Astoria Station's design will recycle process waste water such that there will not be a discharge of any regulated wastes. A water management diagram is included as Attachment 01 to DR SD-PUC-03-01 at Bates**

stamp OTP 36. Note that the water management diagram does not show a discharge from the planned stormwater retention pond, which will adhere to the requirements of the stormwater discharge permit to be obtained from the South Dakota Department of Environment and Natural Resources.

Although no discharge of process waste water is expected under normal operating conditions, Astoria Station's design provides for off-loading from the waste recycle tank in the event of an unexpected occurrence. Astoria Station will also have tanks to hold certain liquids that will require periodic off-site disposal, such as a turbine wash drain tank, fuel gas liquid drain tank, oily water separator, and septic tank. These tanks were included on preliminary engineering drawing number SK-GA-AST-002 in Appendix A of the Application. Prior to any off-site disposal, Otter Tail will work to identify an appropriate off-site facility authorized to receive that type of waste.

Disposal of miscellaneous solid wastes are anticipated to be minimal, as described in Section 24 of the Application (page 50). All disposal will comply with federal and state regulations and standards.

- b. Otter Tail's waste management program involves a range of operational and functional levels within the company. Astoria Station on-site personnel will be trained on permits and other compliance requirements related to waste management. Environmental compliance staff regularly interact with plant personnel on matters associated with waste management, thereby providing an additional layer of oversight. Periodic internal audits also ensure the company complies with federal, state, and local regulations.
- 3-2) Please identify if there will be any Emergency Planning and Community Right-to-Know Act (EPCRA) Sections 311-312 chemicals and quantities planned to be stored at the facility. If there are any, please provide an overview of Otter Tail's program for reporting these chemicals to appropriate organizations.

**Response:**

Astoria Station will likely have EPCRA 311 and 312 reporting obligations. Examples of chemicals anticipated to be present on-site include sulfuric acid and #2 fuel oil. Otter Tail employs experienced environmental compliance staff for reporting and oversight of EPCRA reporting obligations. A Tier II report will be submitted annually by March 1<sup>st</sup>. Astoria Station will maintain safety data sheets (SDSs) at the facility and submit a list of hazardous chemicals to the State Emergency Response Commission (SERC), Local Emergency Planning Committee (LEPC), and local fire department as required by EPCRA.

- 3-3) Pursuant to ARSD 20:10:22:27, please describe in general terms and by technical description any by-products to be produced by the proposed facility and their destinations.

**Response:**

**No by-products are anticipated to be produced by Astoria Station.**

STATE OF MINNESOTA )  
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COUNTY OF OTTER TAIL )

Being first duly sworn, I am the authorized agent of Otter Tail Power Company for purposes of the responses.

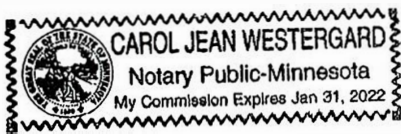
I do not have personal knowledge of all the facts recited in the foregoing Otter Tail Power Company Responses to Staff's Third Data Requests, but the information has been gathered by and from employees and contractors of the owner of the Astoria Station Project; and the information is verified by me as being true and correct on behalf of the owner of the Astoria Station Project.

Dated this 6<sup>th</sup> day of February, 2018.

OTTER TAIL POWER COMPANY

By *William Swanson*  
William Swanson, P.E.  
Its Manager, Supply Engineering

Subscribed and sworn to before me this 6<sup>th</sup> day of February, 2018.



*Carol Jean Westergard*  
Notary Public  
(SEAL)

My Commission Expires: 1/31/2022

**CERTIFICATE OF SERVICE**

I, Jason R. Sutton, do hereby certify that I am a member of Boyce Law Firm, LLP, attorneys for Otter Tail Power Company and that on the 6<sup>th</sup> day of February 2018, a true and correct copy of the foregoing and this Certificate of Service were served via email to the following addresses listed:

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