



2025 Annual Landfill Inspection

*Blue Pit
Coyote Station
Beulah, North Dakota*

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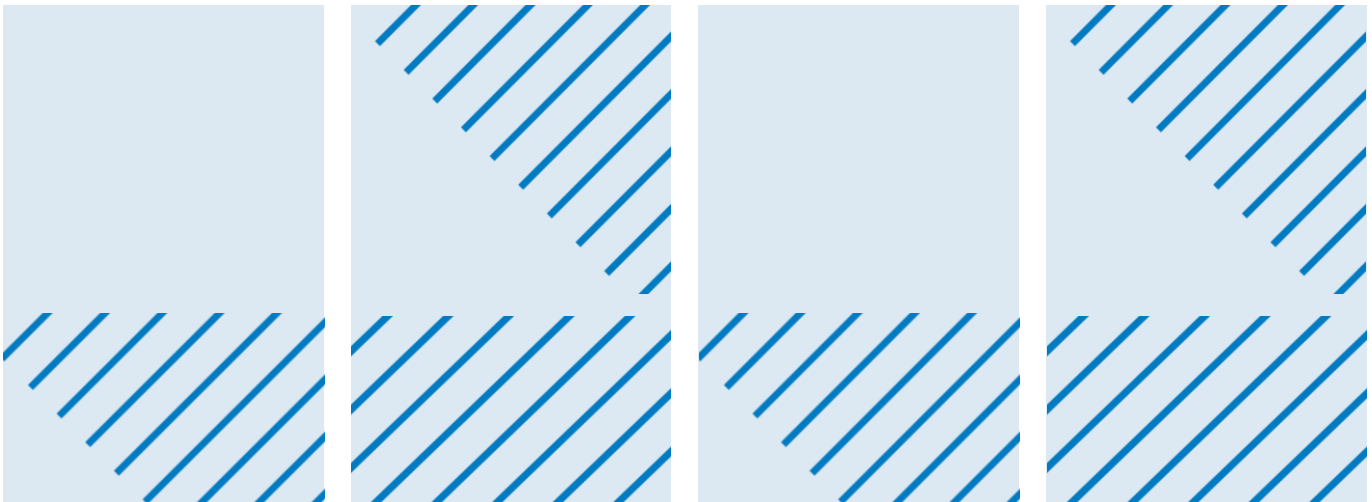
Prepared for
Otter Tail Power Company

Prepared by
Barr Engineering Co.

November 2025

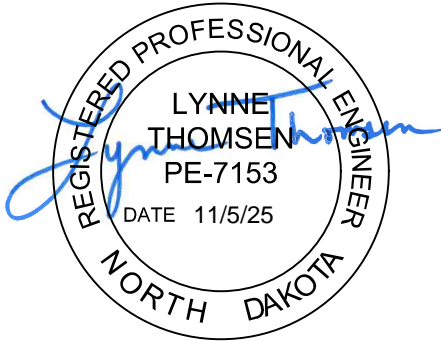
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Certification

I hereby certify that I have examined the facility and, being familiar with the provisions of 40 CFR 257 Subpart D, attest that Otter Tail Power Company's Coyote Station, Blue Pit landfill design, construction, operation, and maintenance are consistent with recognized and generally accepted good engineering standards, including consideration of applicable industry standards and the requirements of 40 CFR §257.84.



Lynne M. Thomsen, PE
PE-7153

11/5/2025
Date



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November 2025

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1 Introduction

Otter Tail Power Company (OTP) operates Coyote Station (Coyote), in Beulah, North Dakota. Coyote is a coal-fired steam-electrical generator, the operation of which results in coal combustion residuals (CCR) as a by-product. CCR management is subject to Federal Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments per 40 CFR 257 Subpart D (CCR Rule).

Blue Pit is a landfill located on the Coyote Station property used for disposal of CCR. Blue Pit is required to meet the CCR Rule requirements for landfills and is therefore subject to annual inspections by a qualified professional engineer. This report includes the information required by § 257.84(b) *Annual inspections by a qualified professional engineer* and documents the annual inspection performed by Lynne M. Thomsen, PE, on October 7, 2025, as required by the CCR Rule.

2 Review of Existing Information

A review of existing information was performed to confirm that the design, construction, operation and maintenance of the landfill are consistent with recognized and generally accepted good engineering standards. No deficiencies were found, and the existing information reviewed is described in following subsections.

2.1 Previous Landfill Inspections

Barr Engineering Co. (Barr) has completed the Annual Landfill Inspection Reports since 2015; all previous reports are located on OTP's CCR website (<http://www.ccr-cs.net/blue-pit/>). They stated that existing site information was reviewed, a site inspection was completed, and no deficiencies were found.

2.2 Weekly Inspections

Weekly inspection reports ["intervals not exceeding seven days" §257.84(a)(1)(i)] from November 4, 2024, through October 27, 2025, were reviewed for this report. The reports were dated at intervals not exceeding seven days. No deficiencies were noted.

3 Structural Integrity and Operational Review

An on-site inspection was conducted on October 7, 2025, to visually identify signs of distress or malfunction of the CCR unit. No deficiencies were found, and the results of the inspection are included in the following subsections.

3.1 Visual Inspection of Blue Pit Landfill

The inspection consisted of on-foot inspection of perimeter berms and embankments, the active landfill face, and final covered areas. This result and other visual inspection items and results are summarized in the following table:

Table 1 Summary of Visual Inspection

Item	Visual Inspection Description	Consistent With Good Engineering Standards (Yes/No)	Notes
1	Proper placement of waste	Yes	None
2	Adequate slope stability and erosion control	Yes	None
3	Run-on and run-off controls properly functioning	Yes	No issues in the area were noted during the engineer's on-site inspection
4	Surface water percolation minimized	Yes	Good slopes on cap minimize ponding and surface water percolation
5	Liner systems properly operated and maintained	Yes	Clay liner is covered and protected
6	Contact water systems properly operated and maintained	Yes	None
7	Water quality monitoring systems maintained and operating	Yes	Groundwater monitoring system appeared to be in good condition
8	Dust adequately controlled	Yes	Winds during the inspection were 10 to 15 miles per hour and no dust issues were observed
9	Geometry of landfill is unchanged from previous inspection	Yes	None
10	Animal burrows absent or of no significance	Yes	None
11	Adequate vegetation density and vegetation maintenance	Yes	Vegetation has rebounded from previous year
12	Debris controlled or absent	Yes	None

3.2 Other Changes

Additional monitoring wells were added on the south and west sides of the site to begin background monitoring for future cell expansion. No other changes to the CCR unit design, maintenance, or operations were observed or reported by OTP. The annual inspection did not reveal any conditions that would cause concern with regard to actual or potential structural weakness of the CCR unit, or any existing conditions that are disrupting, or have the potential to disrupt, the operation and safety of the CCR unit.

4 Volume of CCR Contained

The volume of CCR contained in the landfill was determined by reviewing quarterly landfill reports and adding that to the volume of the 2024 Annual Inspection for this report. The quarterly reports document the amount of material hauled to the landfill in tonnage. An assumed unit weight of 1 ton per cubic yard was used to determine the volume. Since October 9, 2024 (the last inspection), approximately 148,050 cubic yards (CY) of CCR was added to the landfill. The estimated CCR contained in the landfill as of the October 7, 2025, inspection is shown in Table 2 below.

Table 2 Volume of CCR Contained in Landfill

Permitted Design CCR Capacity (CY) ^[1]	Current CCR Contained in the Landfill (CY)	Status of Active Cell
10,104,336	4,396,020	Sequence 4: Active with partial final cover Sequence 5: Active Sequence 6: Active with partial final cover Sequence 7: Closed with final cover Sequence 8A: Closed with final cover

[1] NDDEQ, September 2019

5 References

NDDEQ, September 2019. Permit for Solid Waste Management Facility, Coyote Station (Blue Pit) (0182).

Ottertail Power Company, January 2025. 4th Quarter 2024 Ash Report, Coyote Station (Blue Pit) (0182).

Ottertail Power Company, October 2025. 3rd Quarter 2025 Ash Report, Coyote Station (Blue Pit) (0182).