



2018 Annual Landfill Inspection

Big Stone Plant – CCR Temporary Storage Area

Prepared for
Otter Tail Power Company
Big Stone City, South Dakota

December 2018

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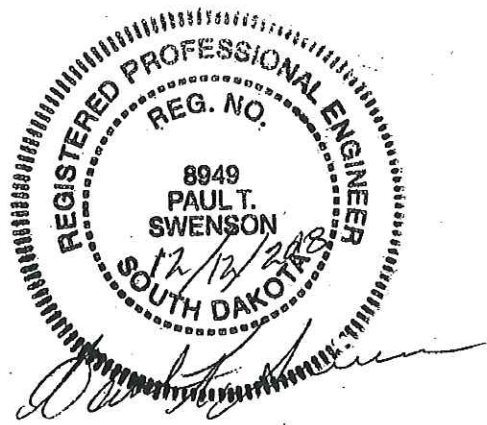


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Certifications

I hereby certify that I, or someone under my direct supervision, have examined the Big Stone Plant Temporary Storage Area, and, being familiar with the provisions of 40 CFR 257 Subp. D and standard practices of the industry, I have determined that the Temporary Storage Area design, construction, operation, and maintenance are consistent with generally accepted good engineering standards.



Digitally signed
by Paul T.
Swenson
Date: 2018.12.12
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Paul T. Swenson, P.E.
Barr Engineering Co.
Registration Number 8949

Dated this 12th day of December, 2018

1.0 Introduction

Otter Tail Power Company (OTP) operates the Big Stone Plant (Big Stone), located near Big Stone City, South Dakota. The Big Stone Plant is a coal-fired electrical generating plant, operation of which results in coal combustion residuals (CCR) as a by-product. Management of CCR is subject to Federal Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments per 40 CFR 257 Subpart D (CCR Rule). CCR generated by the plant is placed in an on-site landfill or sent off-site for beneficial use.

Bottom ash is sluiced to an incised impoundment on site. It is then excavated from the impoundment and temporarily stored in a location adjacent to the impoundment until it is either transported off-site for beneficial use or placed in the on-site landfill. The storage area is referred to as the Temporary Storage Area (TSA).

The TSA is a CCR pile that is required to meet applicable portions of the CCR Rule for landfills, and is therefore subject to annual inspections by a qualified professional engineer (QPE). This report documents the 2018 annual inspection, as required by the CCR Rule.

2.0 Review of Existing Information

Existing information was reviewed to confirm that the design, construction, operation and maintenance of the TSA 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 Results of Weekly Inspections

Weekly inspections were conducted by a qualified person from December 2017 through November 2018. Inspection reports from December 5, 2017, through November 27, 2018, were reviewed as part of the QPE annual inspection. Review of the weekly inspection reports did not identify any potential issues with operation or maintenance of the TSA.

2.2 Results of Previous Annual Inspections

The 2017 annual inspection report was reviewed in preparing this 2018 report. Minor ponding was observed at the time of the 2017 inspection, though actions were taken to regrade the area to promote positive drainage. The 2017 report did not identify any other significant deficiencies at the facility when compared with industry practices and state permit and rule requirements.

3.0 Structural Integrity and Operational Review

An on-site inspection was performed on October 26, 2018, to visually identify signs of distress or malfunction of the CCR Unit. The results of the inspection are included in the following subsections.

3.1 Visual Inspection of TSA

Inspection consisted of on-foot inspection of perimeter berms and embankments, and the active temporary storage area. Visual inspection items and results are summarized in the following table:

Table 3-1 Summary of Visual Inspection

Item	Visual Inspection Description	Consistent With Good Engineering Standards (Yes/No)	Notes
1	Proper placement of waste	Not Applicable	TSA undergoing closure at time of inspection. No waste being placed.
2	Adequate slope stability and erosion control	Yes	None.
3	Run-on and Run-off controls properly functioning	Yes	None.
4	Surface water percolation minimized	Yes	None.
5	Contact water systems properly operated and maintained	Yes	None.
6	Water quality monitoring systems maintained and operating	Yes	None.
7	Dust adequately controlled	Yes	None.
8	Geometry of TSA is unchanged from previous inspection.	No	TSA undergoing closure at time of inspection.
9	Animal burrows absent or of no significance	Yes	None.
10	Adequate vegetation density and vegetation maintenance	No	TSA undergoing closure at time of inspection.
11	Debris controlled or absent	Yes	None.

3.2 Other Changes

The TSA was undergoing closure at the time of the inspection. CCR was being removed and no new CCR was being placed in the CCR Unit. No other changes to the CCR Unit design, maintenance, or operations were observed as part of the annual inspection that could affect the stability or operation of the CCR Unit.

4.0 Volume of CCR Contained

Based upon field measurements taken as part of the annual inspection, the estimated volume of CCR contained in the CCR Unit at the time of the inspection was approximately 2,300 cubic yards. CCR was being removed from the unit at the time of inspection as outlined in the Closure Plan.