

Memorandum

To: Mark Thoma, Manager Environmental Services
From: Paul Swenson
Subject: Otter Tail Power Company, Big Stone Plant, Temporary Storage Area Closure Certification
Date: February 7, 2019
Project: 41251005

Otter Tail Power Company (OTP) undertook construction activities in 2018 to remove coal combustion residuals (CCR) from the Temporary Storage Area (TSA) at its Big Stone Plant near Big Stone City, South Dakota. Closure by removal construction activities were documented in the Closure Construction Documentation Report, Temporary Storage Area (TSA), prepared by Barr Engineering Co. (Barr) in December 2018.

Closure construction for the TSA was conducted in accordance with the Closure Plan, Temporary Storage Area, prepared by Carlson McCain in October 2016.

Groundwater samples were collected and analyzed after completion of closure construction activities. Statistical analysis of groundwater sampling results completed on February 5, 2019, demonstrate that groundwater concentrations do not exceed the groundwater protection standard established pursuant to § 257.95(h) for constituents listed in Appendix IV to 40 FCR Part 257, Disposal of Coal Combustion Residuals from Electric Utilities. Therefore, it is determined that the TSA has been closed in accordance with the requirements of 40 CFR § 257.102, closure by removal of CCR procedures established in paragraph (c).

I hereby certify that closure of the Temporary Storage Area at Otter Tail Power Company's Big Stone Plant has been completed in accordance with the closure plan specified in paragraph 40 CFR § 257.102 (b) and the requirements of 40 CFR § 257.102, and that I am a duly licensed professional engineer under the laws of the State of South Dakota.