



## 2025 Annual Landfill Inspection

*Big Stone Plant – Ash Disposal Area*



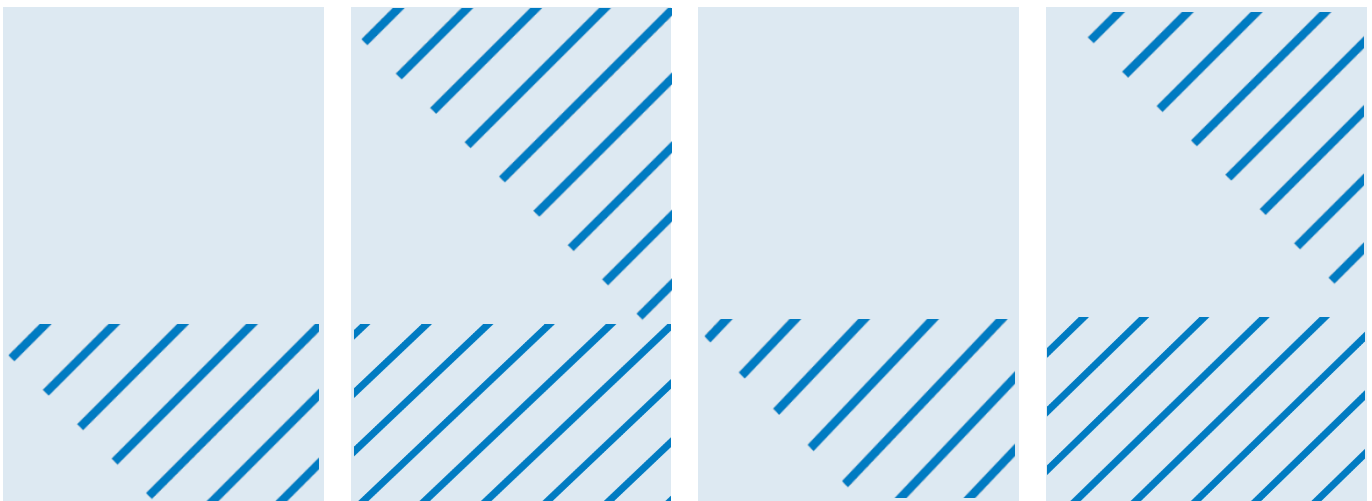
Prepared for  
Otter Tail Power Company  
Big Stone City, South Dakota

Prepared by  
Barr Engineering Co.

December 2025

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## Certification

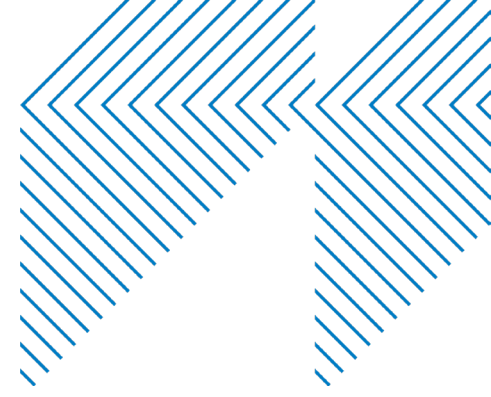
I hereby certify that I, or someone under my direct supervision, have examined the Big Stone Plant Ash Disposal Area CCR Landfill, and, being familiar with the provisions of 40 CFR 257 Subp. D and standard practices of the industry, I have determined that the Ash Disposal Area design, construction, operation,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



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Josef K. Hjerpe  
Barr Engineering Co.  
Registration Number 15902

Dated this 8<sup>th</sup> day of December, 2025



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December 2025



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## Abbreviations

ADA	Ash Disposal Area
Big Stone	Big Stone Plant
CCR	Coal Combustion Residuals
OTP	Otter Tail Power Company
QPE	Qualified Professional Engineer

# 1 Introduction

Otter Tail Power Company (OTP) operates the Big Stone Plant (Big Stone), located near Big Stone City, South Dakota. Big Stone 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. The on-site landfill is known as the Ash Disposal Area (ADA).

The ADA is required to meet CCR Rule provisions for landfills and is therefore subject to annual inspections by a qualified professional engineer (QPE). This report documents the 2025 ADA annual inspection, as required by the CCR Rule.

## 2 Review of Existing Information

Existing information was reviewed to confirm that the design, construction, operation, and maintenance of the ADA 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 landfill inspections were conducted by a qualified person. Inspection reports from December 3, 2024, through November 25, 2025, 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 ADA. An area of heaving was noted in the inspection reports and is discussed further in Section 3.1.

### 2.2 Results of Previous Annual Inspections

The 2024 annual inspection report was reviewed in preparing this 2025 report. The 2024 report did not identify any significant deficiencies at the facility when compared with industry practices and state permit and rule requirements.

### 3 Structural Integrity and Operational Review

An on-site inspection was performed on September 11, 2025, 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 Ash Disposal Area

Inspection consisted of on-foot inspection of perimeter berms and embankments, the active ADA face, and final covered areas. 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	Yes	None
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 ADA is unchanged from previous inspection.	Yes	Approximately 7 acres of the landfill were closed in 2023.
9	Animal burrows absent or of no significance	Yes	None
10	Adequate vegetation density and vegetation maintenance	Yes	Vegetation well established. Site is hayed every 2 years (done this year).
11	Debris controlled or absent	Yes	None

A heave was observed on the recently closed portion of the landfill, approximately 1/3 of the way up the west side. The area was approximately 20' long (north to south) by 5' wide. After the inspection, soil and grass seed was placed in the area to allow for proper drainage and to improve vegetation. The area will continue to be monitored by OTP staff and will be reviewed during next year's annual inspection.

#### 3.2 Other Changes

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 Volume of CCR Contained in ADA

A topographic survey was conducted on August 13, 2025. Approximately 99,280 cubic yards of material were placed in the ADA between the previous survey conducted in July 2024 and the August 2025 survey. Based on the rate of filling between the surveys, it was estimated that approximately 3.5 million cubic yards of CCR and other approved materials were in place in the ADA at the time of the 2025 QPE inspection on September 11, 2025.