



December 7, 2019

Otter Tail Power Company
Hoot Lake Plant
1012 Water Plant Road
Fergus Falls, MN 56537

Re: 2019 Annual Inspection of Hoot Lake Ash Landfill

The Hoot Lake Ash Landfill (landfill) inspection was conducted on October 9th, 2019 by Daniel J. Riggs, a professional engineer licensed in the State of Minnesota. This was the fifth inspection done in accordance with the EPA's published Coal Combustion Residual (CCR) Rules under section 257.84.

The following items were evaluated as a part of the Section 257.84(b) Inspection:

i) Any changes in geometry of the structure since the previous annual inspection

Annual topographic surveys have been conducted on the landfill since initial construction. During that time, no changes in landfill geometry or embankment alignment have been observed.

ii) The approximate volume of CCR contained in the unit at the time of the inspection

A topographic survey was conducted on October 22, 2019. The volume of CCR in Phase II, Cell 1 & 1A is 278,796 cubic yards, and Phase II, Cell 2 is 302,864 cubic yards for a total volume of 581,660 cubic yards. Phase I was closed prior to October 2015 and is excluded from this total.

iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit

The landfill was inspected for structural weakness by walking a traverse at the base, top and interior of the embankment, and all across the final cover system. There were no major signs that structural weakness had previously or is presently occurring on the landfill. Minor issues, such as erosion of cover material, had occurred but were identified during routine weekly inspections and corrected prior to the annual inspection. There are no conditions disrupting the operation or safety of the CCR unit.

iv) Any other changes(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection

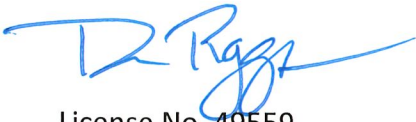
The CCR placed in the landfill consists of fly ash and bottom ash and exhibits pozzolanic properties. This creates a structurally stable fill that is not subject to settlement or shifting once placed and compacted.

I have reviewed the weekly inspection forms from December 2018 through November 2019 and all available information (i.e. Design and Construction documentation) and can ensure that the design, construction, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.

Certification:

I hereby certify that this report was prepared by me or under my supervision and that I am a duly registered professional engineer under the laws of the State of Minnesota.

Sincerely,
Daniel J. Riggs, PE



License No. 49559
Senior Engineer
Carlson McCain, Inc.