



2015 Annual Landfill Inspection

Hoot Lake Plant - Coal Ash Landfill

Fergus Falls, Minnesota

Prepared for
Otter Tail Power Company

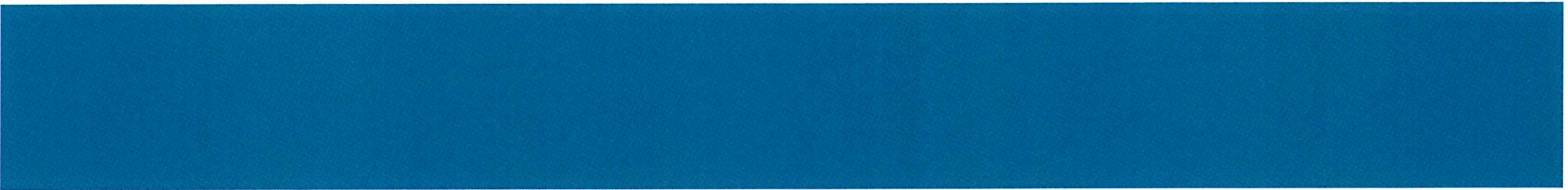
January 2016

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Certifications

I hereby certify that I have examined the facility and, being familiar with the provisions of 40 CFR 257 Subp. D, attest that this Annual Landfill Inspection report has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR §257.84.



James C. Berkas, P.E.
Barr Engineering Co.
Registration Number 44916

Dated this 18th day of January, 2016

1.0 Introduction

Otter Tail Power Company (OTP) operates the Hoot Lake Plant (Hoot Lake), in Fergus Falls, Minnesota. Hoot Lake is a coal-fired electrical generator that results in production of coal combustion residuals (CCR). 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). OTP currently hauls CCR material from the Hoot Lake Plant to the on-site landfill for disposal.

The landfill is required to meet the CCR Rule for landfills, and is therefore subject to annual inspections by a qualified professional engineer (QPE). This report documents the first annual inspection performed by James C. Berkas, P.E. on October 12, 2015, as required by the CCR Rule. Other annual inspection duties, including a review of the available information regarding the status and condition of the CCR Unit and storage capacity evaluations, were performed prior and following the on-site inspection.

2.0 Review of Existing Information

A review of existing information was performed to confirm that the design, construction, operation and maintenance of the landfill is 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

OTP commenced weekly landfill inspections by a qualified person on October 20, 2015. Weekly inspection reports from October 20, 2015 through December 31, 2015 were reviewed as part of this annual inspection.

2.2 Results of Previous Annual Inspections

This report is the first annual inspection report required by the CCR Rule; the results of previous annual inspections are therefore not available. A review and summary of pertinent information contained in previous inspection reports will be included in future reports.

3.0 Structural Integrity and Operational Review

An on-site inspection was performed on October 12, 2015 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 Landfill

Inspection consisted of on-foot inspection of perimeter berms and embankments, the active landfill 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	Visibly Observed (Yes/No)	Notes
1	Proper placement of waste	Yes	No waste placement issues observed at time of inspection.
2	Adequate slope stability and erosion control	Yes	No significant erosion identified at time of inspection.
3	Run-on and Run-off controls properly functioning	Yes	Surface water controls appeared adequate at time of inspection.
4	Surface water percolation minimized	Yes	No surface water ponding or excessive leachate generation observed at time of inspection.
5	Liner systems properly operated and maintained	Yes	No liner systems issues observed at time of inspection.
6	Leachate collection systems properly operated and maintained	Yes – Except as Noted	OTP fixing transducer for lysimeter at time of inspection.
7	Water quality monitoring systems maintained and operating	Yes	Existing monitoring wells were accessible and appeared to be in good condition at time of inspection.
8	Dust adequately controlled	Yes	No dust issues present at time of inspection
9	Geometry of landfill is unchanged from previous inspection.	NA	2015 inspection is first inspection conducted under the CCR Rule. Future annual inspections will compare geometry to 2015 baseline.
10	Animal burrows absent or of no significance	Yes	No burrows of significance identified at time of inspection.
11	Adequate vegetation density and vegetation maintenance	Yes	Vegetation appeared well established and well maintained at time of inspection.
12	Debris controlled or absent	Yes	No debris present at time of 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.

4.0 Volume of CCR Contained

A topographic survey of the landfill was performed in December 2015 to calculate volumes of CCR contained in the CCR unit. The following table summarizes the volume of CCR contained in the landfill.

Table 4-1 Volume of CCR Contained in Landfill

Phase/Cell	Current CCR Capacity Consumed (cy)	Status of Phase/Cell
Phase I	347,140	Closed
Phase II Cell 1 & 1A	220,992	Phase II Cell 1 & 1A (partially closed),
Phase II Cell 2	43,129	Open,

