

Notice of Intent to Initiate Closure

Hoot Lake Plant Ash Landfill

1) Introduction

The purpose of this document is to comply with the notification and certification requirements for coal combustion residual (CCR) facility closure in the Federal CCR rule, 40 CFR Part 257.

2) Notice of Intent to Close

During the summer of 2023, Otter Tail Power Company (Otter Tail) intends to close the CCR Ash Landfill located at Hoot Lake Plant at 1012 Water Plant Road in Fergus Falls, MN. The plant ceased coal-fired electricity generation on June 1, 2021. This notification satisfies the requirements of 40 CFR 257.102(g):

No later than the date the owner or operator initiates closure of a CCR unit, the owner or operator must prepare a notification of intent to close a CCR unit. The notification must include the certification of a qualified professional engineer or the approval from the Participating State Director or the approval from EPA where EPA is the permitting authority for the design of the final cover system as required by §257.102(d)(3)(iii), if applicable. The owner or operator has completed the notification when it has been placed in the facility's operating record are required by §257.105(i)(7).

3) Final Cover System

When CCR is left in place, §257.102(d)(3) requires that the owner or operator must install a final cover system that is designed to minimize infiltration and erosion, and at a minimum, meets the requirements of §257.102(d)(3)(i) or the alternative final cover system specified in §257.102(d)(3)(ii).

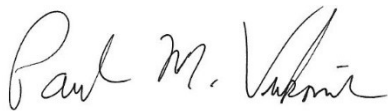
The Hoot Lake Plant CCR Closure Plan states the final cover profile will consist of a 40-mil textured linear low-density polyethylene geomembrane barrier, a 12-inch granular drainage layer that promotes subsurface drainage off the geomembrane, 6 inches of rooting soil, 6 inches of topsoil, and vegetative cover. The Plan further states that this final cover profile complies with the standards of the Federal CCR Rule.

The unit will be closed in accordance with the CCR Closure Plan. Following closure, a construction documentation report will be prepared by a professional engineer licensed in the State of Minnesota and placed in the facility's operating record and posted on the facility's CCR website.

Separately, detailed construction plans and specifications have been submitted to the Minnesota Pollution Control Agency (MPCA) for their review and approval. Within 30 days of completion of closure. Otter Tail will also submit the construction documentation report to the MPCA for their review and approval.

4) PE Certification

I hereby certify that the final cover system of the Hoot Lake Plant CCR Landfill has been designed to meet the requirements of 40 CFR § 257.102(d)(3) and that I am a duly licensed professional engineer under the laws of the State of Minnesota.



April 13, 2023

Paul M. Vukonich, P.E.
License No. 50857
Owner: Otter Tail Power Company

Date



April 13, 2023

Daniel J. Riggs, P.E.
License No. 49559
Consulting Engineer: Carlson McCain, Inc.

Date