2025 Annual Landfill Inspection

Cell 2

Prepared for
Minnkota Power Cooperative, Inc.
Milton R. Young Station

Prepared by
Barr Engineering Co.

January 2026

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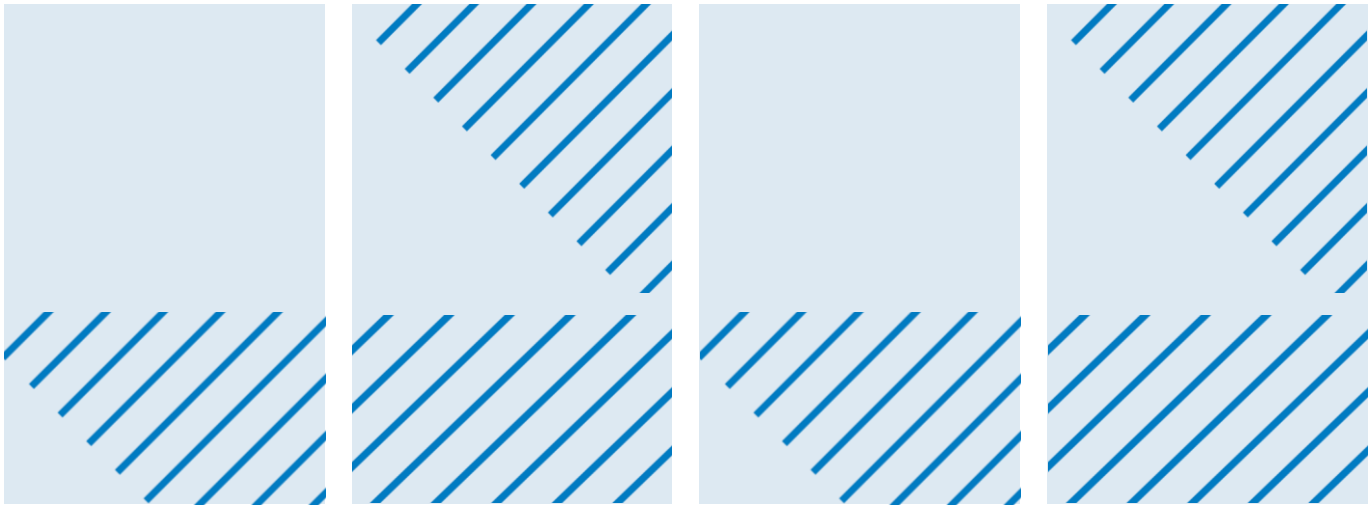
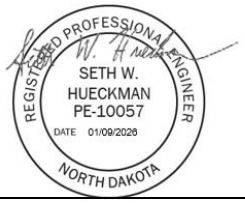


Certification

I hereby certify that I have examined the facility and, being familiar with the provisions of NDAC Title 33.1, Article 20, Chapter 08, 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 NDAC 33.1-20-08-05.



Seth W. Hueckman
North Dakota Registration Number PE-10057

January 9, 2026
Date

Seth Hueckman

Digitally signed by Seth Hueckman
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1 Introduction

Minnkota Power Cooperative, Inc. (MPC) operates the Milton R. Young Station (MRY), near Center, North Dakota. MRY operates two lignite-fired cyclone boilers, resulting in production of coal combustion residuals (CCR). MPC manages CCR generated at MRY in its Coal Combustion Waste Disposal Facility (CCWDF), which is regulated by the North Dakota Department of Environmental Quality (NDDEQ) division of waste management, Permit Number 0159. MPC's CCR management is subject to the provisions of North Dakota Administrative Code (NDAC) Title 33.1, Article 20, Chapter 8, these standards will be referred to herein as the CCR Rule. MPC hauls dry CCR material to Cell 2 of the CCWDF, which is considered a CCR landfill. The eastern and western portions of Cell 2 are filled to permitted grade and final closure of those areas was completed in 2020. The central portion of Cell 2 reached closure grades and was closed in 2023, leaving approximately 2.5 acres open along the southern border with Cell 3. Additional fill in Cell 3 is required for safe construction access to close the remaining open portion of Cell 2.

Under NDAC 33.1-20-08-05.5, CCR landfills are subject to annual inspections by a qualified professional engineer (QPE). This report documents the landfill annual inspection performed by Seth W. Hueckman, P.E. on September 22, 2025, 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 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. The existing information reviewed is described in the following subsections.

2.1 Results of Weekly Inspections

Weekly inspection reports from January 6, 2025 through December 29, 2025 were reviewed as part of this annual inspection. No deficiencies were found.

2.2 Results of Previous Annual Inspections

The annual inspection performed in September 2024 documented the following visual observations and associated remedial activities:

> Some windblown bottom ash observed in final covered areas. MPC cleaned up areas of windblown bottom ash and will continue to monitor and cleanup as necessary.

3 Structural Integrity and Operational Review

An on-site inspection was performed to visually identify signs of distress or malfunction of the landfill. Inspection consisted of on-foot inspection of perimeter embankments, the active landfill face, and the cover construction area. Visual inspection items and results are summarized in the following table:

Table 1 Summary of Visual Inspection

Item	Visual Inspection Description	Visibly Observed (Yes/No)	Notes
1	Proper placement of waste	Yes	Waste properly contained within cell.
2	Adequate slope stability and erosion control	Yes	No significant erosion identified.
3	Run-on and Run-off controls properly functioning	Yes	Surface water controls appeared adequate.
4	Surface water percolation minimized	Yes	No significant surface water ponding or excessive leachate generation observed.
5	Liner systems properly operated and maintained	Yes	No significant liner systems issues observed.
6	Leachate collection systems properly operated and maintained	Yes	Leachate collection pump was operational.
7	Water quality monitoring systems maintained and operating	Yes	Existing monitoring wells were accessible and appeared to be in good condition.
8	Dust adequately controlled	Yes	No significant dust issues present at time of inspection.
9	Landfill geometry consistent with facility plan	Yes	No geometry changes observed.
10	Animal burrows absent or of no significance	Yes	No burrows of significance were observed. Some minor animal burrows on the southern edge of the constructed final cover were identified. MPC repaired in 2025.
11	Adequate vegetation density and vegetation maintenance	Yes	Vegetation appeared well established and well maintained on outer embankments and previously closed areas. The outer embankments were mowed to maintain woody vegetation; Barr recommends this practice is continued in 2026.
12	Debris controlled or absent	Yes - Except as noted	Waste debris was properly contained in landfill. Some windblown bottom ash observed in final covered areas. MPC cleaned up areas of windblown bottom ash and will continue to monitor and cleanup as necessary.

No changes to the landfill design, maintenance, or operations were observed that could affect the stability or operation of the landfill.

4 Volume of CCR Contained

A topographic survey of the landfill was performed on September 12, 2025, which was used to calculate volumes of CCR contained in the CCR unit and capacity remaining. The following table summarizes the volume of CCR contained in the landfill.

Table 2 Volume of CCR Contained in Landfill.

Cell	Approximate Permitted Design CCR Capacity (cy)	Current CCR Capacity Consumed (cy)	Approximate Remaining CCR Capacity (cy)	Status of Cell
Cell 2	3.60M	3.60M	0.00M (See Note 1)	Active

Notes:
1). Additional fill in Cell 3 is required for safe construction access to close the remaining open portion of Cell 2.