2025 CCR Annual Report

Dairyland Power Cooperative
Alma Off-Site Disposal Facility
Phase IV Landfill
Town of Belvidere, Wisconsin

License 4126

January 2026

Prepared For:

Dairyland Power Cooperative
3200 East Avenue South
La Crosse, Wisconsin 54601

Prepared By:

TRC
999 Fourier Drive, Suite 101
Madison, Wisconsin 53717

BreAnne Kahnk, P.E.
Project Engineer

Todd Martin
Principal Project Manager

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APPENDICES

1.0 Introduction

TRC Environmental Corporation (TRC), prepared this Annual Report (Report) for the Alma Off-Site Disposal Facility, Phase IV Landfill (Landfill) on behalf of Dairyland Power Cooperative (DPC). This Report was prepared in general accordance with the requirements of Chapter NR 506.20(3), Wisconsin Administrative Code.

The Landfill is owned and operated by DPC. The Landfill is located in the NE 1/4 of the NE 1/4 of Section 19 and portions of Sections 18 and 20, T21N, R12W, Town of Belvidere, Buffalo County, Wisconsin. The Landfill accepts CCR produced from electricity generation. DPC operates the Landfill in compliance with the Plan of Operation (RMT, 2000), and subsequent Plan of Operation Modifications, as permitted by the Wisconsin Department of Natural Resources (WDNR, License Number 4126).

The Plan Modification for Initial Permitting of CCR Landfills was submitted in January 2023 with subsequent addenda submitted in January and July 2024. WDNR provided a Conditional Plan of Operation Modification Approval letter for the Landfill on May 5, 2025. Per s. NR 506.20(3) and the conditional approval letter, this annual report is to contain the following components:

- Annual CCR fugitive dust control report per s. NR 506.20(3)(a),
- Annual inspection report performed by a professional engineer per s. NR 506.20(2)(b),
- Annual groundwater monitoring and corrective action report per s. 507.15(3)(m) and Condition 2c of the May 5, 2025 Conditional Approval Letter,
- Leachate pipe cleaning and inspection report per s. 506.07(5)(g) and Condition 2a of the May 5, 2025 Conditional Approval Letter, and
- Landfill compliance certification required by s. NR 506.19(1), Wisconsin Administrative Code per Condition 2b of the May 5, 2025 Conditional Approval Letter.

These components are discussed in detail in **Section 2** of this report and their associated appendices.

2.0 Annual Operations Reporting

2.1 Annual Fugitive Dust Control

An annual fugitive dust control report was prepared by DPC in accordance with 40 CFR 257.80(c) and s. NR 506.20(3)(a) to document the dust control procedures implemented in the last 12 months, a summary of concerns, if any, raised by stakeholders, and a description of the corrective action taken, if any, by the Landfill in response to concerns of the Landfill.

During the last 12 months, typical dust control measures used at the Landfill include, water spray within active landfill as needed, wetting access road, sweeping activities, use of covered trucks, and utilizing controls to limit tracking ash out of the landfill as specified by the Dust Control Plan. A dust control log has been maintained to document dust control during the reporting year. No concerns were brought to the attention of the Landfill by stakeholders. No corrective action was undertaken to improve dust control at the Landfill. The Annual Fugitive Dust Control Report, dated December 2025, is included as **Appendix A**.

2.2 Annual Inspection Report

An annual site inspection of the Landfill was performed by TRC in November 2025. The goal of the inspection was to ensure that the design, construction, operation, and maintenance is consistent with recognized good engineering practices. In addition, the inspection looked for conditions of structural weakness or conditions that may affect the safe operation of the CCR unit.

As concluded in the site inspection, the Landfill is designed, constructed, operated, and maintained with good engineering practices and the site was being operated in a safe manner with no indication of structural weakness. Dusting was observed during the site visit during periods of gusting winds and DPC noted that they would wet the working face following the site visit to control dust. In addition, erosion of CCR was noted on the working face with eroded material deposited between the active face and cell delineation berm. Eroded CCR was recommended to be relocated to maintain freeboard along the cell delineation berm and monitoring and stabilization of eroded areas of the working face was also recommended. The 2025 Annual Inspection by a Professional Engineer Report, dated December 2025, is included as **Appendix B**.

2.3 Annual Groundwater Monitoring Report

An annual groundwater monitoring report was prepared by TRC on behalf of DPC. The report represents ongoing detection monitoring events performed to comply with s. NR 507 and applicable conditional approvals.

DPC reports that there were no exceedances of NR 140 Preventative Action Limits, Enforcement Standards, or Alternative Concentration Limits during the 2025 monitoring events. Therefore, DPC will continue detection monitoring and is not required to take additional action. The 2025 Groundwater Monitoring Report is included as **Appendix C**.

2.4 Leachate Pipe Cleaning and Inspection Report

Leachate line jetting was completed in May, August, and October of 2025 in accordance with the annual leachate cleaning requirements set forth by Chapter NR 506.07(5)(c). During the jetting events, inspection of the MH6 line into Cell 3 occurred with televising of the line prior to and following jetting completed during the May 2025 event. Restrictions were noted in this line between 200 and 500 feet with the restriction becoming less severe after each jetting attempt. No other issues were noted during the May 2025 jetting event.

During the August 2025 jetting event, jetting activities were focused on the initial 600 feet of the leachate line from MH-6 as elevated leachate levels had been noted in Cell 3 along with the restrictions seen during the May 2025 event. A gate valve was removed from MH-6 during this jetting event to allow for a larger rotating jetting head to enter the leachate line. Following jetting, leachate was observed to be flowing into the manhole, this leachate was collected by a combination of industrial vacuum equipment and gravity flow to the leachate collection tank. During the October 2025 event, jetting occurred in all leachate collection lines within the Landfill. Blockages were noted and cleared during the procedure.

In general, the lines were found to be in good working order with no significant problems encountered, except for the previously discussed leachate line extending from Cell 3 into MH-6. During jetting activities in 2025, it was determined that larger jetting nozzles may be needed to properly jet this line and clear restrictions noted between 200 and 600 feet. DPC will continue to monitor leachate levels in the cell and select appropriate jetting activities for this line based on future needs and conditions. The leachate jetting reports are included as **Appendix D**.

2.5 Ash Disposal

The table contained in **Appendix E** lists tons of ash placed in the Alma Off-site (AOS) Landfill (License # 04126) along with recycling tonnages. All fly ash was deposited via the low moisture mode of disposal. Approximately 77% of the fly ash generated by the John P. Madgett (JPM) Generating Facility during 2025 was beneficially reused. In 2025, 89% of the JPM bottom ash was also recycled. During 2025, Dairyland beneficially used 100% of the available stockpiled bottom ash as of October 2025, stockpiling of bottom ash resumed following the construction season and during the winter of 2025. For 2025, Dairyland was only stockpiling bottom ash within a separate area of our active Phase IV landfill. Bottom ash was no longer being stockpiled at the JPM Facility. In 2026, we will continue to strive for a 100% recycling rate of our bottom ash in beneficial reuse projects/uses.

“Fly ash”, as stated above, includes other post combustion byproducts such as dry scrubber material and bag house ash. Fly ash, derived from our electrostatic precipitator (ESP) process, was recycled at a rate of 100% from our JPM Facility in 2025.

2.6 Compliance Certification

A copy of the compliance certification in accordance with the requirements of NR 506.19(1), Wisconsin Administrative Code is contained in **Appendix F**.

Appendix A: Annual Fugitive Dust Control Plan

ANNUAL DUST CONTROL REPORT
Dairyland Power Cooperative Alma Offsite Phase IV Landfill
December 2025

Introduction

Dairyland Power Cooperative (DPC) has prepared this Annual Dust Control Report in accordance with 40 CFR 257.80(c) to document the following information for the Alma Offsite Phase IV Landfill (Phase IV Landfill) located near Alma, Wisconsin:

- Description of dust control procedures implemented at the Phase IV Landfill
- Summary of any concerns raised by stakeholders
- Description of any corrective actions taken

Implementation of Dust Control Procedures

During the last 12 months, dust control procedures have been implemented at the Phase IV Landfill, as discussed in the Dust Control Plan for the Alma Offsite Phase IV Landfill (Dust Control Plan), dated December 30, 2022. A dust control log has been maintained to document dust control during the reporting year. Typical dust control measures used in and around the landfill include, water spray within the active landfill as needed, wetting access roads, sweeping activities, use of covers on trucks, controls to limit tracking ash out of the landfill. A copy of the current Dust Control Plan is available in the DPC operating record and on the DPC internet site, as required by 40 CFR 257.105(g) and 257.107(g).

DPC is considering additional modifications to the landfill ash processing facility to improve dust control during ash load out and transfer to the landfill. A status report appears below:

- The Dustmaster Mixer addition at the JPM facility in 2019 is functioning well and has completed the goal of a reduction in our dusting in 2020.

Stakeholder Correspondence

During the last 12 months, the following concerns or complaints have been received by DPC:

- No concerns or complaints were received.

For each correspondence item above, follow-up communications were completed, and records have been maintained by DPC (Note: none for this reporting period). If needed, corrective actions have been implemented as discussed under Corrective Actions.

Corrective Actions

Based on inspections and/or stakeholder correspondence during the last 12 months, corrective actions have not been identified to improve dust control at the Phase IV Landfill. A summary of corrective actions, including completion date or status, is provided below.

- None.

Closing

A copy of the most recent Annual Dust Control Report is available in the Facility operating record and on the DPC internet site, as required by 40 CFR 257.105(g) and 257.107(g). The DPC internet site also provides contact information and requests that stakeholders contact DPC with any concerns regarding dust controls at the Facility.

Appendix B: Annual Inspection Report

TRC

999 Fourier Dr., Ste. 101
Madison, WI 53717

t 608.826.3600

December 11, 2025

Mr. Leif Tolokken
Dairyland Power Cooperative
3200 East Avenue South
La Crosse, WI 54601

Subject: Alma Off-Site Disposal Facility – Phase IV Landfill
2025 Annual Inspection by a Professional Engineer

Dear Mr. Tolokken:

This letter presents the results of the inspection of the Alma Off-Site Disposal Facility – Phase IV Landfill located in the town of Belvidere, Buffalo County, Wisconsin. Prior to the inspection TRC reviewed the permitting documents, the weekly inspection forms, the operational plans, and the documents posted on the publicly accessible website.

On November 12, 2025, BreAnne Kahnk, PE, of TRC Environmental Corporation (TRC) performed an on-site inspection of Dairyland Power Cooperative's (DPC) coal combustion residual landfill with Leif Tolokken of DPC. Attached to this letter are the inspection report and a photographic log to document the observed conditions.

Based on the documents reviewed and the site inspection, the landfill is designed, constructed, operated, and maintained consistent with good engineering practices. The site was being operated in a safe manner and there were no indications of structural weakness at the time of the inspection.

Sincerely,

TRC

BreAnne Kahnk, P.E.
Senior Engineer

Attachments: Landfill Inspection Checklist
Photographic Log

cc: Todd Martin – TRC
Brian Kalvelage – DPC

999 Fourier Dr., Suite 101 (53717) Madison, WI 608.826.3600

PROJECT/PROPOSAL NAME	PREPARED		CHECKED		PROJECT/PROPOSAL NO.
	By:	Date:	By:	Date:	
Dairyland Power Cooperative Phase IV, Alma Off-site Disposal Facility	B. Kahnk	11/21/2025	T. Martin	11/26/2025	624404.0000

Landfill Annual Inspection Report

Purpose:

This inspection checklist has been developed to meet the requirements for inspections by a qualified professional engineer for a coal combustion residual (CCR) landfill. This checklist exceeds the requirements for 40 Code of Federal Regulations 257.84(b) and s. NR 506.20(2), Wisconsin Administrative Code. This inspection of the Alma Off-Site Disposal Facility Phase IV Landfill was performed by TRC Environmental Corporation on behalf of Dairyland Power Cooperative (DPC).

The goal of the inspection is to ensure that the design, construction, operation, and maintenance is consistent with recognized good engineering practices. In addition, the inspection looked for conditions of structural weakness or conditions that may affect the safe operation of the CCR unit.

The following were performed for the inspection of the CCR unit.

Review of Available Information:

The following documents were reviewed in preparation of the site visit and confirmed to be located within the electronic operating system at the facility.

- Fugitive Dust Control Plan (12/30/2022)
- Dust Control Report (12/2023)
- Post-Closure Plan (01/2024)
- Closure Plan (07/2024)
- Run-on and Run-off Control System Plan (07/2024)
- Annual Landfill Inspection Report (12/14/2023)
- Location Restrictions (1/30/2023)
- Weekly inspections performed by qualified personnel (11/8/2024 through 11/6/2025)
- Dust Inspections performed from 10/2024 through 10/2025
- WDNR CCR Annual Report (1/27/2025)
- WDNR Plan Modification (1/30/2023)
- WDNR Plan Modification Addendum 1 (1/2024)
- WDNR Plan Modification Addendum 2 (7/2024)
- CCR Groundwater Monitoring Report (1/2025)
- WDNR Plan Modification Approval Letter (5/5/2025)

Comments on the Operating Record:

Electronic system that is well organized and accessible from the office at the landfill. Able to access weekly inspections, reports, records of government notifications, and records of state approvals.

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	By:	Date:	By:	Date:	
Dairyland Power Cooperative Phase IV, Alma Off-site Disposal Facility	B. Kahnk	11/21/2025	T. Martin	11/26/2025	624404.0000

Summary of the Site Conditions (based on document review):

DPC operates a CCR landfill (Alma Off-Site Disposal Facility Phase IV Landfill) located in the NE 1/4 of the NE 1/4 of Section 19 and portions of Sections 18 and 20, T21N, R12W, Town of Belvidere, Buffalo County, Wisconsin. The location of the Phase IV landfill is in a valley.

The Phase IV landfill is permitted through the State of Wisconsin (License #4126). To date, the liner system for Cells 1, 2A, 2B, 3A and 3B have been constructed. Final cover has been installed over a portion of Cells 1, 2A, and 2B. There is an interim geosynthetic cover over a portion of the CCR in Cells 2B, 3A and 3B. Cell 3B, the most recently constructed cell of the Phase IV landfill, was constructed during May through August 2015. The landfill construction includes a composite liner system, composite cover system, leachate collection system, leachate storage tank, and storm water controls (diversion berms, sedimentation basin, ditching, culverts and downslope flumes).

Changes to the unit since the previous report:

Since the inspection in 2024, there has been continued placement of CCR into Cells 2B, 3A, and 3B. Minor repairs to the existing temporary geosynthetic cover on the northern side of the landfill were completed. No additional temporary geosynthetic cover has been placed at the landfill. Evaluations and additional leachate line jetting were completed successfully during 2025 to address a leachate head level issue within the landfill. The additional jetting cleared pipe perforation blockages from the southern end of the Cell 3 leachate collection pipe and allowed DPC to maintain leachate head levels at less than 1 foot after jetting as noted in the monthly headwell measurements. No major changes have occurred since 2024 inspection.

Approximate volume of CCR in the unit at the time of the inspection: Approximately 1,332,091 cubic yards of CCR had been placed in the Phase IV landfill based Dairyland Power Cooperative's tonnage reports.

Visual Inspection:

A site visit and visual inspection were performed by BreAnne Kahnk (TRC Environmental Corporation) on November 12, 2025.

Time arrived on site: 10:00 a.m.

Time departed from site: 11:53 a.m.

DPC Personnel Present: Leif Tolokken

Weather Conditions: sunny, 48˚, intermittent wind gusts

Summary of Items Visually Inspected: Electronic operating record, weekly inspection forms, sedimentation basin, perimeter berms and access road, perimeter run-on controls including stormwater channels, outlets, culverts; final cover areas including diversion berms and vegetation; working area conditions; surface condition at the leachate collection tank and leachate transfer manholes; and flow into leachate tank.

Site Operations during Inspection: CCR placement was not occurring during site visit.

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Dairyland Power Cooperative Phase IV, Alma Off-site Disposal Facility	B. Kahnk	11/21/2025	T. Martin	11/26/2025	624404.0000

Appearance of structural conditions:

Final Cover Conditions (Cell 1, 2A, and 2B areas):

Vegetation Condition: In general, the cover system had a dense, well-established stand of native prairie vegetation present. Small localized areas of sparse vegetation were observed on the final cover over Cell 1, which generally consisted of areas where wild parsnip or woody vegetation had been removed or recently mowed.

Evidence of Erosion: Yes: ____ None: X
Evidence of slumping, sloughing, or slope distress: Yes: ____ None: X
Evidence of seepage: Yes: ____ None: X

Comments: Well maintained. Reseed sparse vegetation areas as needed. Monitor and repair small rut from mowing activities by leachate headwell in Cell 1.

Perimeter Berm:

Vegetation Condition: Dense vegetation, native prairie forbs and grasses

Evidence of Erosion: Yes: ____ None: X
Cracking along crest: Access Road along crest Yes: ____ None: X
Evidence of slumping, sloughing, or slope distress: Yes: ____ None: X
Evidence of seepage: Yes: ____ None: X

Cell Delineation Berms: Exposed geomembrane observed to be in good condition, berm maintains freeboard to contain runoff within the cell; however, some deposits of CCR were observed along the cell delineation berm as a result of erosion of the CCR working face.

Comments: Exposed geomembrane does not show signs of deterioration or damage. Material that migrated off the working face should be relocated to maintain temporary storage capacity for contact water.

Stormwater Controls:

Run-on Controls: Diversion berms and grading provide adequate drainage away from open areas.

Perimeter Drainage Ditches: Erosion prevented by vegetation, areas around inlets are clear and protected by stone. Woody vegetation was generally not observed in perimeter drainage ditches; however, minor woody debris was observed. Minor ponding was observed in perimeter drainage ditch.

Comments: Continue to keep drainage ditches clear. Remove branch debris from drainage ditches. Continue to monitor ditches for woody vegetation and clear the vegetation when observed. Continue to inspect for ponding within the drainage ditches, regrade if significant ponding is observed. No other concerns at this time.

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Dairyland Power Cooperative Phase IV, Alma Off-site Disposal Facility	B. Kahnk	11/21/2025	T. Martin	11/26/2025	624404.0000

Run-off Controls: Final Cover

Diversion Berms: Good condition. Well-maintained with good vegetative cover, no erosion observed, and clear of obstructions. Small localized areas with sparce vegetation were observed on the final cover over Cell 1 from woody vegetation and wild parsnip removal.

Comments: Overseed areas with sparce vegetation. Continue to monitor to ensure adequate vegetation growth.

Downslope Flumes: Well-maintained; outlets were cleared of vegetation and good rock protection present. Drains down to perimeter ditches were clear.

Ditching: No erosion observed, clear, good slope. No standing water observed.

Comments: Stormwater controls are well-maintained at the site. Good drainage and conveyance to the sedimentation basin, no obstructions observed. Check dams along perimeter ditching in good condition. Wood debris observed in perimeter ditches which should be removed as soon as possible. Good stand of vegetation in diversion berms and perimeter ditching. Continue to monitor ditches for woody vegetation and clear the vegetation when observed. No other concerns at this time.

Sedimentation Basin No. 1:

Outlets Operational: Yes, clear, no debris and not deformed; stone filter visible at base

Culverts Operational: Yes, clear, inlet and outlet protection for culverts

Comments: Basin was dry, no standing water. Sparse vegetation was observed along pond slopes in areas where wild parsnip was removed. Continue to monitor sparse vegetation locations and overseed if vegetation does not go back in. Continue to monitor remaining vegetation.

Operating Conditions:

Changes in Operation since the previous annual inspection: No significant changes in site operations.

Access Road Conditions:

Durable, paved, well groomed, appreciably free of CCR at egress from Phase IV. Appears to be routinely swept and well maintained. Minor staining observed at start of paved surface from Phase IV.

Comments: Continue to sweep landfill egress as needed, especially following rain events.

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Dairyland Power Cooperative Phase IV, Alma Off-site Disposal Facility	B. Kahnk	11/21/2025	T. Martin	11/26/2025	624404.0000

Landfill Operations:

Temporary Storm Water Controls: Diversions and grading to prevent runoff. Operators to continue to monitor waste placement to ensure sufficient freeboard is maintained along the delineation berm. Holes in the white temporary geosynthetic cover were observed on the northern side of the landfill. Holes should be patched to prevent stormwater from entering below the temporary cover. Geomembrane runout was exposed on the northeast corner of Cell 3B outside the limits of waste. Geomembrane appeared to be in good condition and should be covered with sand to protect the geomembrane from the elements.

Working Face Conditions: Evidence of erosion was observed on the operational face of the landfill with migrated CCR observed within the containment berm ditch. Erosion on the working face should be monitored and stabilized. Migrated CCR should be relocated to ensure sufficient freeboard is maintained along the delineation berm.

Access roads: Good condition.

Fugitive Dust Observed: Yes: X No: ____

Comments: Dust was observed while on site during wind gusts. Exposed waste faces and haul roads were planned to be sprayed later that day. No placement was occurring during visit.

Leachate Management: No leachate ponding observed within cell. Vertical sand drains/chimneys inside Cell 2B had been constructed to connect leachate collection system to the surface. Leachate was observed flowing into tank. Per the more recent monthly headwell measurements, leachate head levels have been maintained under 1 foot following the successful additional jetting that occurred in 2025.

Ash Tracked Out on Access Road? Yes: ____ None: X

Leachate Collection System: Well maintained at surface.

Pipe Cleanouts: Accessible, protected by bollards, name tags in place.

Tank: Controls are accessible and appear operational

Loadout Area: Accessible and operational. Truck waiting at loadout area during site visit.

Comments: Appears to be a well-maintained system used for daily site operations.

Conditions that may potentially impact safety: None observed.

Observed Deficiencies and Proposed Corrective Actions: Dusting was observed during the site visit. The working face and haul roads need to be wetted routinely to prevent windblown dust. DPC noted that they would be wetting the CCR surface following the site visit to control dust. Eroded CCR observed to be deposited within cell delineation (containment) ditch. Material should be relocated to maintain freeboard.

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Dairyland Power Cooperative Phase IV, Alma Off-site Disposal Facility	B. Kahnk	11/21/2025	T. Martin	11/26/2025	624404.0000

Future Action:

– Continue monitoring and maintenance of stormwater controls.
– Continue implementation of dust control practices.
– Remove woody debris from perimeter drainage ditches.
– Cover exposed geomembrane with soil to protect membrane liner runout.
– Repair holes in northern temporary geosynthetic cover.
– Repair rut from mowing activities above leachate head well in Cell 1.
– Regrade and relocate runoff ash at toe of working face to maintain freeboard along the delineation berm.
– Monitor erosion along the working face and stabilize working face.
– Continue to monitor vegetation for signs of displacement or disturbance.
– Overseed localized areas with sparce vegetative cover.
– Continue to sweep landfill egress as needed, especially following rain event

Photographic Log

Client Name:	Site Location:	Project No.:
Dairyland Power Cooperative	Phase IV Landfill Alma Off-Site Disposal Facility	624404.0000

Photo No.	Date
1	11/12/2025

Description:
Asphalt paved site entrance road looking south towards the entrance to the facility and Highway 35.

Photo No.	Date
2	11/12/2025

Description:
Sedimentation Basin 1 outlet. Vegetation established at the base. Gravel placed surrounding base of outlet pipe. No distressed vegetation or sloughing observed on the sideslopes. Scattered sparse vegetation observed due to wild parsnip removal activities. No standing water observed.

Photographic Log

Client Name:	Site Location:	Project No.:
Dairyland Power Cooperative	Phase IV Landfill Alma Off-Site Disposal Facility	624404.0000

Photo No.	Date
3	11/12/2025

Description:
Perimeter road is well maintained and provides access to the east and north sides of the landfill. Leachate headwell protected by bollards. In background of photo, vegetation established on Area 1 and Area 2 final cover. Some sparse vegetation areas due to woody vegetation and wild parsnip removal.

Photo No.	Date
4	11/12/2025

Description:
CCR filling area showing the Cell 3 delineation berm. There is some sediment buildup at the toe of the delineation berm that should be relocated to maintain temporary storage capacity for contact water.

Photographic Log

Client Name:	Site Location:	Project No.:
Dairyland Power Cooperative	Phase IV Landfill Alma Off-Site Disposal Facility	624404.0000

Photo No.	Date
5	11/12/2025

Description
Perimeter drainage ditch with rock check dam.

Photo No.	Date
6	11/12/2025

Description:
Box culvert to accommodate storm water conveyance around perimeter of site. Grouted riprap protects sideslopes at transition. Woody debris observed in portions of drainage ditches. No obstructions observed at the culvert or at conveyance structures.

Photographic Log

Client Name:	Site Location:	Project No.:
Dairyland Power Cooperative	Phase IV Landfill Alma Off-Site Disposal Facility	624404.0000

Photo No.	Date
7	11/12/2025

Description:
Active filling area of the landfill (Cell 3A and 3B). Phase delineation berm in the foreground. Erosion noted on working face. No evidence of unstable conditions.

Photo No.	Date
8	11/12/2025

Description:
Grouted riprap in perimeter ditch displays no signs of undermining. Vegetative growth not impacting performance. Dense vegetation is established around ditch and ditch is clear of obstructions.

Photographic Log

Client Name:	Site Location:	Project No.:
Dairyland Power Cooperative	Phase IV Landfill Alma Off-Site Disposal Facility	624404.0000

Photo No.	Date
9	11/12/2025

Description:
Asphalt paved access road at entrance to filling area. Minor staining observed on the paved surface.

Photo No.	Date
10	11/12/2025

Description:
Wheel shakers installed at egress of Phase IV Landfill to minimize tracking of CCR material outside the permitted limits of waste.

Photographic Log

Client Name:	Site Location:	Project No.:
Dairyland Power Cooperative	Phase IV Landfill Alma Off-Site Disposal Facility	624404.0000

Photo No.	Date
11	11/12/2025

Description:
Leachate tank surface features; clear, accessible, and in good working order. Observed leachate flowing into the tank.

Appendix C: Annual Groundwater Monitoring Report

2025 Annual Groundwater Monitoring and Corrective Action Report – State CCR Rule

Dairyland Power Cooperative
Alma Off-Site Disposal Facility
Phase IV Landfill
Town of Belvidere, Wisconsin

License 4126

January 2026

Prepared For:

Dairyland Power Cooperative
3200 East Avenue South
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BreAnne Kahnk, P.E.
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TABLES

FIGURES

1.0 Introduction

1.1 Background

The Dairyland Power Cooperative (DPC) Alma Off-site Disposal Facility Phase IV Landfill (Landfill) is located in the NE 1/4 of the NE 1/4 of Section 19 and portions of Sections 18 and 20, T21N, R12W, Town of Belvidere, Buffalo County, Wisconsin (**Figure 1**). The Landfill (License Number 4126) accepts coal combustion residual (CCR) material produced from electricity generation and other industry-related waste streams as approved by the Wisconsin Department of Natural Resources (WDNR).

On August 1, 2022, the Wisconsin Department of Natural Resources (WDNR) incorporated federal CCR landfill requirements into chapters NR 500 through 538, Wisconsin Administrative Code. To bring existing CCR landfills into compliance with the code revisions, the WDNR required that a Plan Modification for Initial Permitting of CCR Landfills be submitted for each regulated facility by January 2023. A Plan Modification for Initial Permitting of CCR Landfills was submitted for the subject Landfill to the WDNR in January 2023 (TRC, 2023) with subsequent addendums in January 2024 (TRC, 2024a) and July 2024 (TRC, 2024b). A Conditional Plan of Operation Modification Approval was issued by the WDNR on May 5, 2025 (WDNR, 2025).

NR 507.15(3)(m), Wisconsin Administrative Code, requires that no later than January 31 the year after the groundwater monitoring system has been approved, and annually thereafter, the owner or operator of a CCR unit must prepare an annual groundwater monitoring and corrective action report for the CCR unit documenting the status of groundwater monitoring and corrective action for the preceding year for submittal to the WDNR. This Annual Report was prepared in accordance with the requirements of s. NR 507.15(3)(m), Wisconsin Administrative Code, and Condition 2 of the May 5, 2025 Conditional Plan of Operation Modification Approval letter from the WDNR.

1.2 Groundwater Monitoring Overview

As required by s. NR 507.15(3)(m)(5.), this section provides an overview of the current status of groundwater monitoring and corrective action for the CCR landfill, including:

a. At the start of the current annual reporting period, the Landfill was operating under detection monitoring.

b. At the end of the current annual reporting period, the Landfill was operating under detection monitoring.

c. There were no groundwater quality exceedances under ch. NR 140 for constituents listed under ch. NR 507 Appendix I for CCR wells during the reporting period.

d. No corrective actions were required.

e. No remedies under ch. NR 508 were required.

2.0 Groundwater Monitoring

2.1 Monitoring Well Network

The groundwater monitoring system was approved for the Landfill in the May 5, 2025 Conditional Plan of Operation Modification Approval letter from the WDNR. The detection monitoring network CCR wells and non-CCR wells are summarized in **Table 2-1**. The CCR detection monitoring well network for the Landfill consists of six water table monitoring wells and one piezometer (denoted with an "A" suffix). Three of the water table wells (W-101, W-102R, and W-107) are upgradient (i.e., "background") wells and the remaining four wells are downgradient monitoring wells.

Table 2-1: Monitoring Well Networks

CCR Well Monitoring Network	Non-CCR Well Monitoring Network
W-100R*	W-42
W-100AR*	P-42A
W-101+	P-42B
W-102R+	W-101A
W-105*	W-102AR
W-106*	W-104
W-107+	W-104A

Notes:

* Denotes downgradient wells

\+ Denotes upgradient wells

The monitoring well locations are shown on **Figure 2**. There were no changes to the monitoring well networks during 2025. All monitoring devices functioned properly in 2025 and no repairs, replacements, or modifications were completed on monitoring devices. No significant activities related to the installation, replacement, modification, or abandonment of monitoring devices is currently planned for 2026.

2.2 Semiannual Groundwater Monitoring

The semiannual groundwater sampling events were performed by DPC personnel on March 24-25, 2025, and September 23-24, 2025. The March 2025 sampling event pre-dates the requirements in the May 5, 2025 Conditional Plan of Operation Modification Approval. Samples were analyzed by Pace Analytical Services, LLC. The groundwater data was submitted to the WDNR on May 20, 2025 and November 20, 2025.

Groundwater elevations measured during the September 2025 sampling event were used to construct a groundwater elevation map (**Figure 2**). The map indicates that groundwater flows to the south, consistent with previous monitoring events. The average horizontal hydraulic gradient below the Landfill during this event is estimated at 0.053 ft/ft, resulting in an estimated average seepage velocity of approximately 1.1 ft/day for this event, using the average hydraulic conductivity of 4 ft/day (TRC, 2017) and an assumed effective porosity of 20 percent.

2.2.1 CCR Wells

In accordance with Table 1 of the May 5, 2025 Conditional Approval letter and NR 507 Appendix I, Table 1A, groundwater samples collected from CCR wells in September 2025 were analyzed for alkalinity, hardness, boron, calcium, chloride, fluoride, sulfate, selenium, and total dissolved solids (TDS), and field measurements were collected from CCR wells for groundwater elevation, temperature, conductivity, and pH. There were no groundwater quality exceedances under ch. NR 140 for CCR wells during the reporting period. The September 2025 groundwater results for the CCR wells are included in **Table 1**.

2.2.2 Non-CCR Wells

In accordance with Table 1 of the May 5, 2025 Conditional Approval letter, groundwater samples collected from non-CCR wells in September 2025 were analyzed for alkalinity, hardness, boron, sulfate, and selenium, and field measurements were collected from non-CCR wells for groundwater elevation, temperature, conductivity, and pH. DPC reports that there were no groundwater quality exceedances under ch. NR 140 for non-CCR wells during the reporting period.

3.0 Conclusions and Recommendations

DPC has established a monitoring program at the Landfill and has conducted detection monitoring for 2025 in accordance with Wisconsin Administrative Code and applicable approvals. There were no exceedances of NR 140 standards in 2025. Therefore, the facility will remain in detection monitoring.

The next semiannual monitoring events at the Landfill are scheduled for March and September of 2026.

4.0 References

TRC Environmental Corporation (TRC). 2017. Groundwater Monitoring Program (GWMP) for Compliance with the Federal Coal Combustion Residual Rule – Dairyland Power Cooperative Off-site Disposal Facility Phase IV Landfill, Town of Belvidere, Wisconsin. Prepared for Dairyland Power Cooperative. October 2017.

TRC. 2023. Plan Modification for Initial Permitting of CCR Landfills Alma Off-site Disposal Facility, Phase IV Landfill (License No. 4126). January 30, 2023.

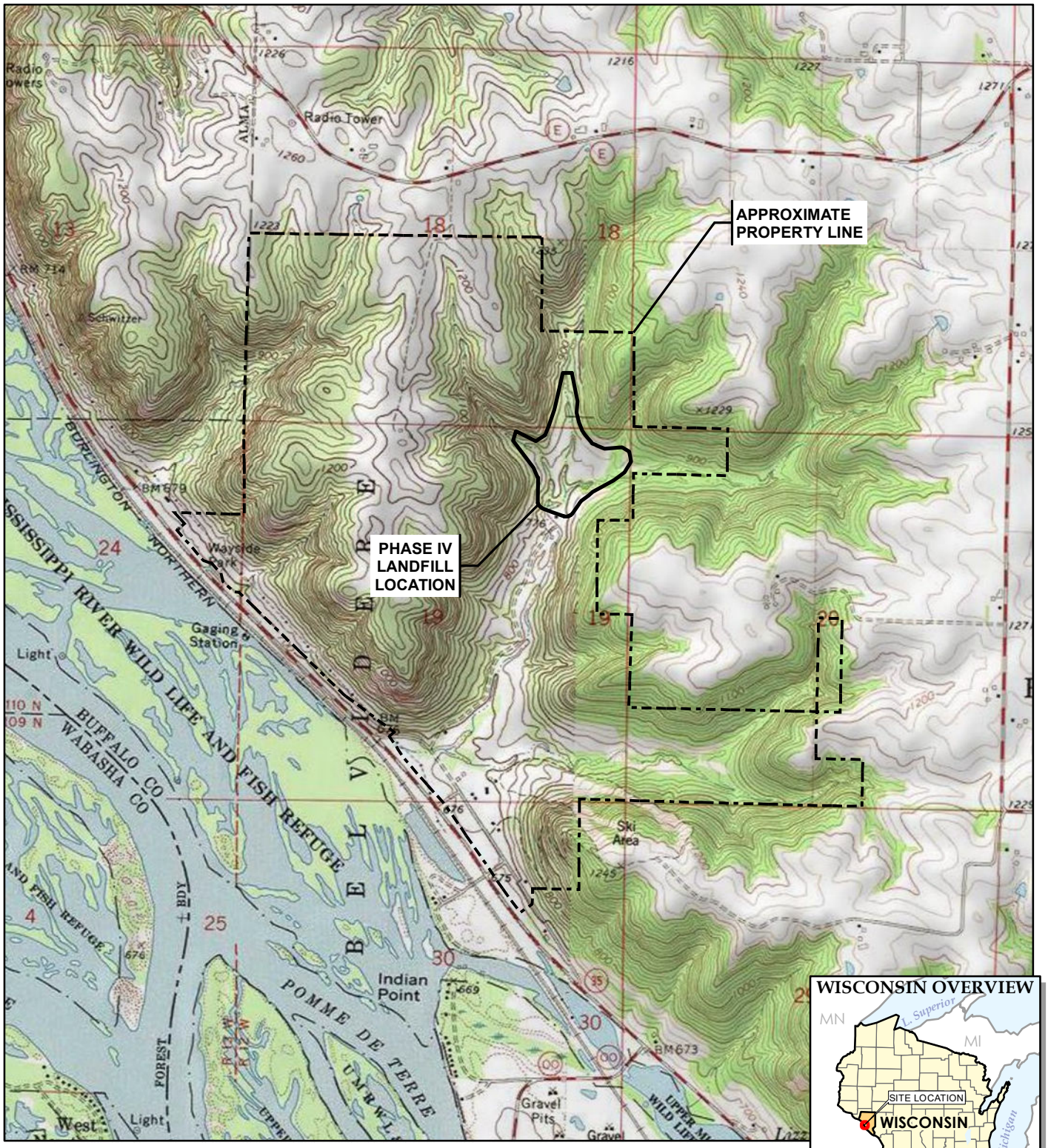
TRC. 2024a. Dairyland Power Cooperative – Alma Off-Site Disposal Facility Phase IV Plan Modification for Initial Permitting of CCR Landfills – Addendum 1. January 17, 2024.

TRC. 2024b. Dairyland Power Cooperative – Alma Off-Site Disposal Facility Phase IV Plan Modification for Initial Permitting of CCR Landfills – Addendum 2. July 24, 2024.

WDNR. 2025. Conditional Plan of Operation Approval Modification for Initial Permitting of a Coal Combustion Residuals (CCR) Landfill, Dairyland Power Cooperative Alma Off-Site Disposal Facility, Phase IV Landfill (License #4126). May 5, 2025.

Table 1: Groundwater Data - CCR Wells
September 2025
Dairyland Power Cooperative - Alma Off-Site Phase IV

PARAMETER	UNITS	W-100AR 9/24/2025 40302196001	W-100R 9/24/2025 40302196002	W-100R DUP 9/24/2025 40302196008	W-101 9/24/2025 40302196004	W-102R 9/23/2025 40302196003	W-105 9/23/2025 40302196005	W-106 9/23/2025 40302196006	W-107 9/24/2025 40302196007
Water elevation	Feet	715.28	726.63		815.73	816.42	733.27	773.28	831.92
Temperature	Deg C	10.8	10.6		10.8	10.0	10.7	11.6	10.4
Conductance, specific	µmhos/cm	608	579		592	514	548	601	670
pH, field	SU	6.82	7.16		7.44	7.47	7.40	7.45	7.25
Alkalinity as CaCO3, total	mg/L	310	308	306	301	275	288	298	316
Hardness as CaCO3	mg/L	341	351	332	347	313	304	341	375
Calcium, total	µg/L	75800	78500	74700	75500	67300	66800	75900	85300
Chloride, total	mg/L	5.3	5.6	5.6	10.9	3.9	4.9	12.1	18.8
Sulfate, total	mg/L	17.3	16.2	16.3	16.8	14.9	13.8	20.3	23.0
Fluoride	mg/L	< 0.095	< 0.095	< 0.095	< 0.095	< 0.095	< 0.095	< 0.095	< 0.095
Boron, total	µg/L	17	12	11	7 J	6.9 J	7.6 J	6.9 J	6.7 J
Selenium, total	µg/L	0.46 J	0.51 J	0.50 J	0.47 J	0.48 J	0.46 J	0.48 J	0.49 J
Total Dissolved Solids (TDS)	mg/L	354	356	366	364	294	304	364	432



BASE MAP FROM USGS 7.5 MINUTE TOPOGRAPHIC QUADRANGLE SERIES.

N

1 " = 2,000 '
1:24,000

0 2,000 4,000 FEET

TRC
999 Fourier Drive, Suite 101
Madison, WI 53717
Phone: 608.826.3600
TRC - GIS

PROJECT:

DAIRYLAND POWER COOPERATIVE
ALMA OFF-SITE DISPOSAL FACILITY, PHASE IV LANDFILL
BUFFALO COUNTY, WISCONSIN

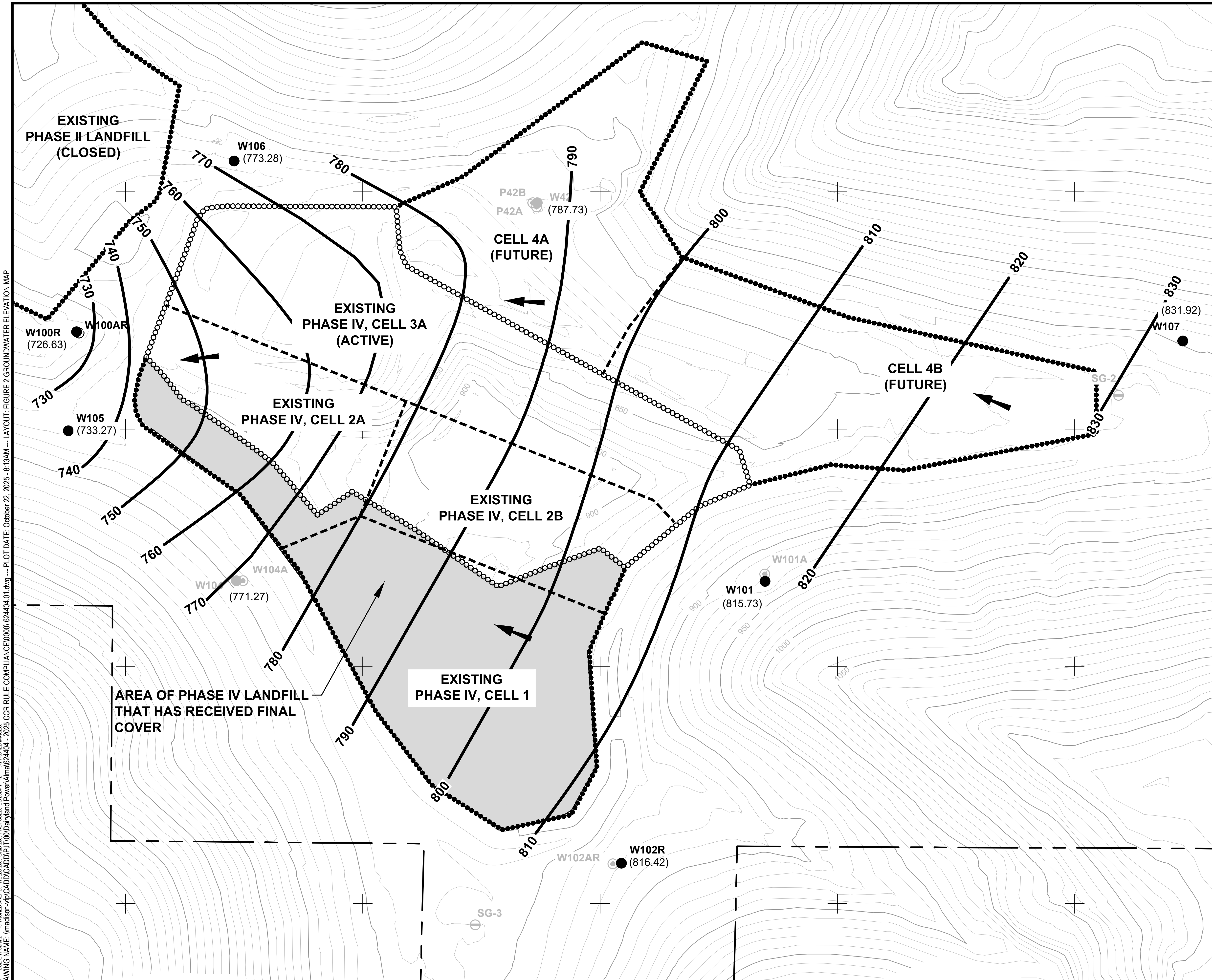
TITLE:

SITE LOCATION MAP

DRAWN BY:	A. ADAIR
CHECKED BY:	B. KAHNK
APPROVED BY:	S. SELLWOOD
DATE:	JANUARY 2026
PROJ. NO.:	469888.0001
FILE:	469888-001slm.mxd

FIGURE 1

T:\1-PROJECTS\Dairyland_Power_Coop\AlmaWI\2020_421717\469888-001slm.mxd -- Saved By: PMARCOU on 1/12/2026, 00:34:42 AM



LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- GRID LOCATION
- 890 — EXISTING 10' CONTOUR
- x 895.7 — EXISTING SPOT ELEVATION
- LIMITS OF PERMITTED LANDFILL
- LIMITS OF CCR DISPOSAL (ACTIVE LANDFILL)
- PHASE LINE
- W42 — MONITORING WELL (NOT INCLUDED IN FEDERAL GWMP)
- W42B — PIEZOMETER (NOT INCLUDED IN FEDERAL GWMP)
- W101 — MONITORING WELL LOCATION
- W101A — PIEZOMETER LOCATION
- (787.22) — GROUNDWATER ELEVATION
- GROUNDWATER FLOW DIRECTION
- 800 — GROUNDWATER EQUIPOTENTIAL LINE

NOTES

1. THE BASEMAP WAS DEVELOPED BY SPLICING THE FOLLOWING SOURCES:
   THE NOVEMBER 13, 2023 EXETER DESIGN GROUND SURVEY AND PERMITTED TOP OF GRANULAR DRAINAGE LAYER BEYOND THE SURVEYED WASTE LIMITS WITHIN CELLS 2A, 2B, 3A & 3B.
   CELL 1 DOCUMENTED SELECT AND CONDITIONED TOP OF ASH GRADES, TAKEN FROM THE RMT, INC., PHASE IV, CELL 1 FINAL COVER CONSTRUCTION DOCUMENTATION REPORT, DATED DECEMBER, 2009.
   CELL 2A AND 2B DOCUMENTED TOP OF SELECT AND CONDITIONED ASH GRADES,TAKEN FROM THE TRC, PHASE IV, CELL 2A FINAL COVER CONSTRUCTION DOCUMENTATION REPORT, DATED DECEMBER 2011 AND THE TRC PHASE IV, AREA C FINAL COVER CONSTRUCTION DOCUMENTATION REPORT, DATED FEBRUARY, 2017.
2. THE HORIZONTAL DATUM IS REFERENCED TO THE WISCONSIN STATE PLANE COORDINATE SYSTEM, CENTRAL ZONE, NORTH AMERICAN DATUM 1983, US SURVEY FEET.
3. VERTICAL DATUM IS NORTH AMERICAN VERTICAL DATUM 1988. CONTOUR INTERVAL IS 10 FEET.
4. GROUNDWATER ELEVATIONS BASED ON MEASUREMENTS TAKEN SEPTEMBER 23-24, 2025. GROUNDWATER ELEVATIONS ARE BASED ON MEAN SEA LEVEL DATUM.

0 200 400
SCALE IN FEET

PROJECT:
DAIRYLAND POWER COOPERATIVE
ANNUAL GROUNDWATER MONITORING REPORT
ALMA OFF-SITE PHASE IV LANDFILL
BUFFALO COUNTY, WISCONSIN

TITLE:
GROUNDWATER ELEVATION MAP

DRAWN BY:	T. FIEBRANZ	PROJ NO.:	624404
CHECKED BY:	B. KAHNK	FIGURE 2	
APPROVED BY:	S. SELLWOOD		
DATE:	OCTOBER 2025		

TRC
999 Fourier Drive
Suite 101
Madison, WI 53717
Phone: 608.826.3600

FILE NO.: 624404.01.dwg

Version: 2017-10-21

Appendix D: Leachate Pipe Cleaning and Inspection Reports

Superior Jetting

Customer Service Report

Customer:	Dairyland Power Cooperative	**Report Number:**	1735
		Date(s):	5/19 thru
Contact:	Attention: Sam		5/22/2025
Address:	Dairyland Power Cooperative	**Page:**	1 of 3
	500 Old Highway 35	**On-Site Hours:**	28.75
	Alma, WI 54610	**Mobilization**	6.0 Hrs.

Description: Jet leachate collection system at Dairyland Power off site ash landfill and processing pipes at the "plant"

Jetting Summary

Location	Pipe Description	Length Jetted	Comments
Cell 3	North Cleanout	1000	
Cell 2	Module B	800	
Cell 1	North Cleanout West Line	600	
Cell 1	North Cleanout East Line	600	Jet through MH1
MH 1	Cell 1 East Line	--	
MH 2	Cell 1 West Line	600	
MH 2	MH 1 Transfer Line	400	
MH 3	MH 3	480	Jet to MH 2
MH 3	MH 3	400	Jet to MH 6. Jet multiple times.
MH 3	Module A	700	
MH 4	MH 4	670	Jet to MH3
MH 6	Cell 3	600	Jet multiple times
Cell 3	Side Slope Pipe	200	
Tank	Leachate Tank Cleanout	500	Jet multiple times
SC	Jet seep control MH 1	250	Jet to MH2
SC	MH 1 to Cell	150	Stand pipe
SC	Jet from MH 2 to MH 1	300	Jet to MH 1
SC	Jet from MH 2 to MH 5	90	
SC	Main Line	700	Adjacent to MH4-MH3. Jet Twice

Superior Jetting, Inc.
P.O. Box 357, Zimmerman, MN 55398
Phone: (763) 631-3133

Additional Comments

May 19, 2025 **Arrived On-Site: 11:00 AM**

- Televised MH 6 cleanout before jetting. Video files provided to site personnel via USB flash drive.
- Jet MH 6 to the distance indicated above. Jet 4 times. Jet through multiple restrictions between 200' to 500 ft. Each time jetting the restrictions were less severe.
- Televised MH 6 cleanout after jetting. Video files provided to site personnel via USB flash drive.
- Jet Cell 3 north cleanout to the distance indicated above. No problems encountered.

Left Site: 5:15 PM

May 20, 2025 **Arrived On-Site: 7:30 AM**

- Jet "steam blow down lines" at the plant. Scale build up was more severe than previous times. 5.0 hours spent jetting.
- Jet Cell 2 module B cleanout to the distance indicated above. No problems encountered.

Left Site: 5:00 PM

May 21, 2025 **Arrived On-Site: 7:30 AM**

- Jet Cell 1 north cleanout west to the distance indicated above. No problems encountered.
- Jet Cell 1 north cleanout east to the distance indicated above. No problems encountered.
- Jet MH 2 west line to the distance indicated above. No problems encountered.
- Jet MH 2 transfer line to MH 1 to the distance indicated above. No problems encountered.
- Jet Cell 3 side slope pipe to the distance indicated above. No problems encountered.
- Jet MH 6 cleanout to cell 3 to the distance indicated above. Jet twice. No problems encountered.
- Jet Seep control "main line" to distance indicated above. No problems encountered. Jet Twice.
- Jet MH 3 to MH 6 to the distance indicated above. No problems encountered. Jet Twice.
- Jet MH 3 to MH 2 to the distance indicated above. No problems encountered.
- Jet MH 3 to Module A to the distance indicated above. No problems encountered.
- Jet MH 4 to MH 3 to the distance indicated above. No problems encountered.

Left Site: 5:30 PM

Superior Jetting, Inc.
P.O. Box 357, Zimmerman, MN 55398
Phone: (763) 631-3133

May 22, 2025 **Arrived On-Site: 7:30 AM**

- Jet Seep control standpipe East of MH1 to distance indicated above. No problems encountered.
- Jet Seep control pipe MH1 to MH2 to distance indicated above. No problems encountered.
- Jet Seep control pipe MH2 to MH1 to distance indicated above. No problems encountered.
- Jet Seep control pipe to MH5 to distance indicated above. No problems encountered.
- Jet from leachate tank cleanout towards MH 4 to the distance indicated above. Jet Twice.

Left Site: 10:30 AM

Superior Jetting, Inc.
P.O. Box 357, Zimmerman, MN 55398
Phone: (763) 631-3133


0000 +0000.8ft
081.8f


0000 +0000.8ft
186.0f
250519 (DPC MH6 --After Jetting) 1550
0:04:56
0:07:01


0000 +0000.8ft
223.9f
250519 (DPC MH6 --After Jetting) 1550
0:05:46
0:06:11


0000 +0000.8ft
246.8f
250519 (DPC MH6 --After Jetting) 1550
19 • May • 2025
0:06:07
0:05:50

Superior Jetting

Customer Service Report

Customer:	Dairyland Power Cooperative	**Report Number:**	1756
		Date(s):	8/11 & 8/12/2025
Contact:	Attention: Brian Kalvelage		
Address:	Dairyland Power Cooperative	**Page:**	1 of 2
	500 Old Highway 35	**On-Site Hours:**	12.25
	Alma, WI 54610	**Mobilization**	6.0 Hrs.

Description: Jet leachate collection system at Dairyland Power off site ash landfill

Jetting Summary

Location	Pipe Description	Length Jetted	Comments
Cell 3	North Cleanout	--	
Cell 2	Module B	--	
Cell 1	North Cleanout West Line	--	
Cell 1	North Cleanout East Line	--	
MH 1	Cell 1 East Line	--	
MH 2	Cell 1 West Line	--	
MH 2	MH 1 Transfer Line	--	
MH 3	MH 3	--	
MH 3	MH 3	--	
MH 3	Module A	--	
MH 4	MH 4	--	
MH 6	Cell 3	600	Jet multiple times, see below
Cell 3	Side Slope Pipe	--	
Tank	Leachate Tank Cleanout	--	
SC	Jet seep control MH 1	--	
SC	MH 1 to Cell	--	Standpipe
SC	Jet from MH 2 to MH 1	--	
SC	Jet from MH 2 to MH 5	--	
SC	Main Line	--	Adjacent to MH4-MH3

Superior Jetting, Inc.
P.O. Box 357, Zimmerman, MN 55398
Phone: (763) 631-3133

Additional Comments

August 11, 2025 **Arrived On-Site: 11:30 AM**

- Jet MH 6 cleanout (valve removed by site) into cell 3 to a distance of 300ft. with ½ inch hose at 8000 PSI pump pressure with "warthog" nozzle. Jet 5 times while site vacuumed liquid in manhole with industrial vacuum equipment.

Left Site: 4:30 PM

August 12, 2025 **Arrived On-Site: 7:15 AM**

- Jet MH 6 cleanout (valve removed by site) into cell 3 to a distance of 600ft. with ½ inch hose at 7000 PSI pump pressure with "grenade" cleaning nozzle. Jet 2 times while site vacuumed liquid in manhole with industrial vacuum equipment.
- Jet MH 6 cleanout (valve removed by site) into cell 3 to a distance of 350ft. with ¾ inch hose at 6000 PSI pump pressure with "warthog" nozzle. Jet 4 times while site vacuumed liquid in manhole with industrial vacuum equipment.

Left Site: 2:30 PM

Notes:

After jetting with the ¾ inch hose equipped with the "warthog" rotating nozzle, substantial leachate flowed into the manhole. Liquid was above the access pipes which prevented us from switching nozzles, entering the manhole, televising and/or continuing to jet. Industrial vacuum equipment provided by the site was unable to keep up with the inflow of leachate.

Superior Jetting, Inc.
P.O. Box 357, Zimmerman, MN 55398
Phone: (763) 631-3133

Superior Jetting

Customer Service Report

Customer:	Dairyland Power Cooperative	**Report Number:**	1775
		Date(s):	10/20 thru 10/23/2025
Contact:	Attention: Sam		
Address:	Dairyland Power Cooperative	**Page:**	1 of 3
	500 Old Highway 35	**On-Site Hours:**	36.0
	Alma, WI 54610	**Mobilization**	6.0 Hrs.

Description: Jet leachate collection system at Dairyland Power off site ash landfill and processing pipes at the "plant"

Jetting Summary

Location	Pipe Description	Length Jetted	Comments
Cell 3	North Cleanout	850	
Cell 2	Module B	800	
Cell 1	North Cleanout West Line	600	
Cell 1	North Cleanout East Line	600	Jet through MH1
MH 1	Cell 1 East Line	--	
MH 2	Cell 1 West Line	600	
MH 2	MH 1 Transfer Line	400	
MH 3	MH 3	480	Jet to MH 2
MH 3	MH 3	400	Jet to MH 6. Jet multiple times.
MH 3	Module A	700	
MH 4	MH 4	670	Jet to MH3
MH 6	Cell 3	700	Jet multiple times, see below
Cell 3	Side Slope Pipe	400	
Tank	Leachate Tank Cleanout	600	Jet multiple times
SC	Jet seep control MH 1	250	Jet to MH2
SC	MH 1 to Cell	150	Stand pipe
SC	Jet from MH 2 to MH 1	300	Jet to MH 1
SC	Jet from MH 2 to MH 5	90	
SC	Main Line	--	Adjacent to MH4-MH3

Superior Jetting, Inc.
P.O. Box 357, Zimmerman, MN 55398
Phone: (763) 631-3133

Additional Comments

October 20, 2025 **Arrived On-Site: 10:30 AM**

- Jet MH 6 to the distance of 325' with the ¾-inch "warthog" spinning nozzle. Could not advance beyond 325'. Jet multiple times.
- Jet MH 6 to the distance of 700' with the ½-inch "grenade" cleaning nozzle. Jet multiple times.
- Jet Cell 3 side slope pipe to the distance indicated above. Jet through blockage at 200' with "small" nozzle.

Left Site: 5:00 PM

October 21, 2025 **Arrived On-Site: 7:15 AM**

- Jet Cell 3 north cleanout to the distance indicated above. No problems encountered.
- Jet MH 6 to the distance of 400' with multiple cleaning nozzle. Jet multiple times for 5.0 hours.
- Jet Cell 3 side slope pipe to a distance of 300'. Jet through blockage at 250' with "small" nozzle.
- Jet Cell 2 module B cleanout to the distance indicated above. No problems encountered.

Left Site: 5:00 PM

October 22, 2025 **Arrived On-Site: 7:15 AM**

- Jet Cell 1 north cleanout west to the distance indicated above. No problems encountered.
- Jet Cell 1 north cleanout east to the distance indicated above. No problems encountered.
- Jet MH 2 west line to the distance indicated above. No problems encountered.
- Jet MH 2 transfer line to MH 1 to the distance indicated above. No problems encountered.
- Jet MH 6 to the distance of 400' with multiple cleaning nozzle. Jet through blockage at 250'. Jet multiple times for 5.0 hours.

Left Site: 4:45 PM

Superior Jetting, Inc.
P.O. Box 357, Zimmerman, MN 55398
Phone: (763) 631-3133

October 23, 2025 **Arrived On-Site: 7:15 AM**

- Jet MH 3 to MH 6 to the distance indicated above. No problems encountered.
- Jet MH 3 to MH 2 to the distance indicated above. No problems encountered.
- Jet MH 3 to Module A to the distance indicated above. No problems encountered.
- Jet MH 4 to MH 3 to the distance indicated above. No problems encountered.
- Jet from leachate tank cleanout towards MH 4 to the distance indicated above.
- Jet Seep control standpipe East of MH1 to distance indicated above. No problems encountered.
- Jet Seep control pipe MH1 to MH2 to distance indicated above. No problems encountered.
- Jet Seep control pipe MH2 to MH1 to distance indicated above. No problems encountered.
- Jet Seep control pipe to MH5 to distance indicated above. No problems encountered.
- Jet "steam blow down lines" at the plant. Jet multiple times with "warthog" ¾-inch cleaning nozzle.

Left Site: 5:30 PM

Superior Jetting, Inc.
P.O. Box 357, Zimmerman, MN 55398
Phone: (763) 631-3133

Appendix E: Ash Disposal Quantities

DPC 2025 Ash Disposition

Fly Ash* Disposition (tons)

	Generated	Recycled	Disposed
JPM	39,427	30,208	9,219
G-3	0	0	0
Total	**39,427**	**30,208**	**9,219**
	Subtotal (percent)	**77**	**23**

Bottom Ash Disposition (tons)

	Generated	Recycled	Disposed
JPM	5,187	4,620	0
G-3	0	0	0
Total	**5,187**	**4,620**	**0**
	Subtotal (percent)	**89%****	**0%**

*Fly ash, as stated above, includes other post combustion byproducts such as scrubber material (SDA or DSI) bag house ash, economizer ash and misc. boiler materials.
The Genoa (G3) power generation facility ceased operations in May of 2021.

**Dairyland utilized 100% of the available stockpiled bottom ash as of October 2025.
The remaining bottom ash was accumulated after the construction season and into winter of 2025
The actual amount of ESP fly ash recycled in 2025 was 27,705.54 tons. A recycling rate of 100%.
No ESP fly ash was disposed of in 2025.
Also, 2502.37 tons of DSI bag house ash went to beneficial reuse in 2025.
This recycling rate is nearly a 10x increase from 2024 as bag house ash is used in more SMA projects.

Appendix F: Compliance Certification

NR 506.19 Compliance Certification

Dairyland Power Cooperative Alma Off-site Landfill

License # 04126

I certify that I am aware of all approved plans for the landfill, all Department conditions of approval, and all applicable solid waste statutory and administrative rules. To the best of my knowledge, information and belief, the landfill is in substantial compliance with all approved plans and requirements for 2025.

Leif Tolokken
Mgr., Water and Waste Programs

6/13/26
Date