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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

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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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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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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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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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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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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.

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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.:
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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.:
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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.

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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.