

Rosebud Power Plant 2025 Annual Engineer's Inspection Report



Prepared for Rosebud Operating Services, Inc.
by Allied Engineering Services, Inc.
2025 Report
Posted: January 15, 2026
Project #: 15-125

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INTRODUCTION

This annual engineer's report presents Allied Engineering's inspection of the CCR landfill and assessment of the landfill operations for the Rosebud Power Plant in Rosebud County, Montana in order to fulfill the requirements of the CCR rule as published in the Federal Register on April 17, 2015 and July 2, 2015 and its effective date of October 19, 2015. The applicable rule section is 40 CFR Parts 257 and 261. The landfill in this report holds inert hydrated fly ash, which is solid and nearly impermeable to water, similar to concrete. This report follows the same format as the previous Engineer's Annual Inspection Reports.

The project site is located approximately seven miles north of the town of Colstrip, Montana in the southwest quarter of Section 29 and the northwest quarter of Section 32 Township 3 North, Range 41 East (Latitude 45.978859°, Longitude -106.663772° (WGS 84)). Maps of current existing conditions are included in Appendix A. The landfill serves an on-site Power Plant owned by Colstrip Energy Limited Partnership (CELP). The Power Plant and the landfill are operated by Rosebud Operating Services, Inc.

The area covered by this report is an active landfill located on the subject property. The active landfill includes Phase 1 and Phase 2 of a contiguous landfill permitted in 1996 and placed in service in October 2005. This active landfill is subject to regulation by the above referenced CCR rules. There is also a closed landfill, last used in October 2005, that has since been reclaimed in general accordance with permits and regulations at the time. This closed landfill is not subject to regulation by the above-mentioned rules and is not the subject of this report.

The information contained herein is based on an investigation and analysis of the property's topographical and subsurface conditions, a review of existing permits, regulatory requirements, maps and literature for the project area as related to the landfiling operations of combusted coal residuals (CCR), more familiarly referred to as fly ash. The purpose of this report is to assess existing conditions, fulfill the Engineer's Annual Inspection requirements of the CCR rule, and provide recommendations for the ongoing landfiling operations.

BACKGROUND

Rosebud Power Plant is a waste coal burning facility using a fluidized bed reactor. During the burning process of the coal, fly ash or combusted coal residuals (CCR) are produced. The CCR are either sold for commercial/industrial purposes or landfilled on-site near the power plant.

In 1996, Chandler Geotechnical, Inc. (a predecessor to Allied Engineering Services, Inc.) was hired as a sub-consultant to JSM, Inc. to provide engineering analysis and design for the current active landfill, consisting of two phases located northwest of the power plant. Phase 1 of the active landfill began receiving ash when the now retired landfill was closed in approximately 2005. During the initial construction of Phase 1, the planned landfill footprint/area was reduced. Over the course of operations at the plant, fly ash was sold in certain years; thus, the amount of fly ash placed in the Phase 1 area was less than anticipated with the original design and had yet to reach its maximum storage capacity.

The reduced fly ash placement from 2005 to 2015 and the smaller starting footprint of Phase 1 resulted in the need for minor modifications of the original design of the landfill area. Phase 2 design modifications began in September of 2015 and were completed in December of 2015. Construction and site preparation of Phase 2 was initiated in the first week of September 2015 and completed in December 2015. Phase 2 has been receiving ash since the Spring of 2016. The construction of Phase 2

was completed in general conformance with the original 1996 design with field modifications undertaken during construction under the guidance of Allied Engineering Services, Inc. The active landfill modifications were designed to assure the availability of storage capacity for the anticipated remaining volume of ash for the balance of the anticipated life of the power plant. At the time of the 2015 analysis and design guidance, this volume was estimated to be 635,987 CY based on the average amount of ash placed prior to 2015. This volume also assumed that no fly ash would be sold. The original 1996 design estimated a needed storage volume of approximately 2,200,000 CY and the 2015 revised design estimated a needed total storage volume of approximately 1,300,000 CY. Under current operations, the site volumes are in line with these estimates.

Since 2015, CCR has been placed in both Phase 1 and Phase 2, however, current placement occurs predominantly in Phase 2. Beginning in 2018, Phase 1 was utilized as a reserve coal storage area and has not received CCR since. During the 2025 annual engineering site visit, it was observed that Phase 1 is no longer used for coal storage, and coal storage operations have shifted to the southwest quadrant of Phase 2. As a result of Phase 1 being inactive for CCR placement since 2018, the ash surface in Phase 1 is approximately 19 feet lower than the ash surface in Phase 2. It is anticipated that CCR placement will resume in Phase 1 to raise the ash surface elevation to match the Phase 2 ash surface elevation, allowing both phases to operate as one surface.

REGULATORY SETTING

As of April 17, 2015, new rules for coal combustion residuals (CCR) were published in the Federal Register Volume 80, Number 74, dated Friday April 17, 2015. The applicable sections include 40 CFR Parts 257 and 261. These rules outline the conditions for existing operating CCR landfills such as the active landfill at the Rosebud Power Plant. The rules provide location restrictions, structural stability assessment requirements, groundwater monitoring requirements, surface water protection, design and operating criteria, along with inspection requirements.

The power plant is currently operating under several permits that include protection criteria for air, surface water, and groundwater quality. Permits include:

- Montana Air Quality Permit No. MAQP 2035-08
- Title V Air Permit: OP2035-05
- Montana Ground Water Pollution Control System (MGWPCS) Permit No. MTX000052
- Montana Pollutant Discharge Elimination System (MPDES) Permit No. MT0031780
- Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity.
- Permit No. MTR000058

EXISTING CONDITIONS

This annual inspection report details the operation efforts of ash placement, landfill construction and maintenance, monitoring of the drainage piping system and groundwater at the Active Landfill's Phase 1 and 2 area. During 2025, the power plant experienced outages that are summarized below:

- Boiler tube leak Outage: June 10 – June 17, 2025
- Boiler tube leak Outage: August 7 – August 30, 2025
- Scheduled Maintenance Outage: October 4 – October 22, 2025

The power plant produced approximately 74,482 CY of fly ash in 2025. Of this 74,482 CY, approximately 157.11 tons (~149 CY) of fly ash was sold between 11/18/2024 and 10/23/2025 while the remainder was landfilled in Phase 2. See *Landfill Volumes Table* for additional volume details. The ash volume was calculated using the 2024 and 2025 site quantity surveys for the annual engineering inspection. Phase 1 no longer operates as a coal storage area and is anticipated to begin receiving CCR in 2026.

EXISTING CONDITIONS AND ANNUAL ENGINEER'S INSPECTION REPORT

The following section quotes the requirements of the EPA CCR rule with the findings from the Engineer's Annual Inspection written as a response to each. The EPA CCR rule excerpts are listed in *italics*. Responses are provided in **bold**.

40 CFR §257.64 Unstable Areas

- a) *An existing or new CCR landfill, existing or new CCR surface impoundment, or any lateral expansion of a CCR unit must not be located in an unstable area unless the owner or operator demonstrates by the dates specified in paragraph (d) of this section that recognized and generally accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disrupted.*

As demonstrated in the 2015 Annual Engineer's Inspection Report, this CCR landfill is not located in an unstable area.

- b) *The owner or operator must consider all of the following factors, at a minimum, when determining whether an area is unstable.*
 - 1) *On-site or local soil conditions that may result in significant differential settling;*

Differential settlement within the landfill was not observed. The design and construction included the removal of topsoil and 5-feet of subsoil prior to placement of fly ash. During the removal of the topsoil and subsoil, the operation of the haul trucks provided initial compaction to the subsoil. The base of the Phase 2 area of the active landfill was compacted by a vibratory roller before ash placement. Pozzolanic¹ characteristics of hydrated fly ash provide a relatively strong mass of material that distributes the load evenly across the landfill footprint. Point load tests of hydrated ash core samples were completed by Ray Womack in 1992 on the retired CCR landfill. The results of the testing indicated compressive strength values comparable to a weak rock or concrete. The shear stresses exerted at depth by the weight of the ash landfill are proportional to the steepness and the height of the finished slope, and to the unit weight of the landfill materials. Due to the gentle overall finished side slopes of 3H:1V (considering the 10' wide benches) and the low density of the ash, approximately

¹ Pozzolans are a siliceous or silico-aluminous material that will, in finely divided form and in the presence of moisture, chemically react with calcium hydroxide at ordinary temperatures to form compounds having cementitious properties (there are both natural and artificial pozzolans).

80 pounds per cubic foot, the ash landfill will exert considerably less stress on the foundation materials than many of the natural slopes in the immediate vicinity of the landfill.

2) On-site or local geologic or geomorphologic features

The landfill is located in the mapped Lebo member of the Fort Union Formation. As discussed previously, the relative low-density characteristics of the fly ash distributed over a large area should not exert significant force to the underlying geology. There are no observed or mapped faults in the immediate vicinity of the active landfill. In addition, there is no indication of settlement in the closed landfill located approximately 1,300 feet southeast of the active landfill.

The landfill is characterized as a cross valley fill across two ephemeral swales. The design includes water conveyance under the landfill by way of piping systems with bypass spillways designed to divert water around the perimeter in order to limit oversaturation of vicinity soil. To assure long term drainage stability, the final configuration for closure includes perimeter conveyance of water and abandonment of the piping system under the landfill (See 2016 Annual Engineer's Inspection Report for perimeter conveyance plans).

3) On-site or local human-made features or events (both surface and subsurface).

The design of the landfill accounted for appropriate side-slopes to limit the likelihood of instabilities. The original design as well as the 2015 design update utilized 3H:1V side slopes for the man-made berms surrounding the landfill area. This side slope is a common and conservative reclamation slope throughout the country, and specifically in the local Colstrip area which includes extensive coal mines.

The active landfill is located across two ephemeral drainages. The original design called for three pipes that convey the natural drainage of the active landfill site. The main drainage covers an area of 103 acres with a secondary drainage covering an area of 16 acres. The original design utilized a High-Density Polyethylene (HDPE) dual wall corrugated pipe. The reason for the selection of this pipe was for its flexibility, which would allow bridging of the soil in a deep bury situation. The 2015 design update continued the use of an HDPE pipe but selected a steel-reinforced HDPE pipe for added stability. The storm water conveyance pipes themselves are likely the most vulnerable element in the landfill system in terms of long-term stability (in the event of a pipe failure). As stated previously, a surface conveyance system will replace the current piping system around the time of landfill closure.

- c) The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the demonstration meets the requirements of paragraph (a) of this section.*

The landfill area was designed by a professional engineer. Additionally, this report serves as Allied Engineering Services, Inc.'s certification that the landfill is not situated in an unstable area.

- d) The owner or operator of the CCR unit must complete the demonstration required by paragraph (a) of this section by the date specified in either paragraph (d)(1) or (2) of this section.*

- 1) *For an existing CCR landfill or existing CCR surface impoundment, the owner or operator must complete the demonstration no later than October 17, 2018.*

This requirement was met prior to the first annual Engineer's Inspection Report (dated January 19, 2016) which was before the deadline and was provided to the facility for placement in their operating record.

- 2) *For a new CCR landfill, new CCR surface impoundment, or any lateral expansion of a CCR unit, the owner or operator must complete the demonstration no later than the date of initial receipt of CCR in the CCR unit.*

Not applicable, the active CCR landfill area has been in use prior to the regulatory timeframe of October 19, 2015.

- 3) *The owner or operator has completed the demonstration required by paragraph (a) of this section when the demonstration is placed in the facility's operating record as required by § 257.105(e)*

Reporting requirements as outlined in § 257.105(e) will be followed. CELP maintains operational requirements on their webpage (<http://www.celpccr.com>)

- 4) *An owner or operator of an existing CCR surface impoundment or existing CCR landfill who fails to demonstrate compliance with the requirements of paragraph (a) of this section by the date specified in paragraph (d)(1) of this section is subject to the requirements of § 257.101(b)(1) or (d)(1), respectively.*

Acknowledged.

- 5) *An owner or operator of a new CCR landfill, new CCR surface impoundment, or any lateral expansion of a CCR unit who fails to make the demonstration showing compliance with the requirements of paragraph (a) of this section is prohibited from placing CCR in the CCR unit.*

Not applicable to existing landfills and the requirements of paragraph (a) were met with the first annual Engineer's Inspection Report (dated January 19, 2016).

- e) *The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in § 257.105(e), the notification requirements specified in § 257.106(e), and the Internet requirements specified in § 257.107(e)*

Acknowledged.

§257.84 Inspection requirements for CCR Landfills

- b) *Annual inspections by a qualified professional engineer.*
 - 1) *Existing and new CCR landfills and any lateral expansion of a CCR landfill must be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and*

maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. The inspection must, at a minimum, include:

- i. A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., the results of inspections by a qualified person, and results of previous annual inspections); and*

Weekly inspections were undertaken by facility personnel during the calendar year of 2025. A review of the weekly inspection reports revealed no significant issues with the active CCR landfill. A few of the highlights of 2025 are as follows:

03/28/2025 Start of spring vegetation growth.

6/13/2025 Performed berm work

10/24/2025 Coal pile has been moved to southwest corner of active ash pit

12/26/2025 Last received inspection report

Copies of the weekly inspection reports are available upon request and are maintained onsite within the environmental records. The landfill continues to be operated in general conformance with the original design. The Phase 2 area has received all the ash for 2025.

Soil containment berms have been constructed on the perimeter of Phase 2 to allow the elevation of the landfill to continue to rise. In 2025, berm construction took place primarily along the north, south, and west sides of Phase 2. Berms were constructed primarily with ash and will be covered with subsoil and topsoil. All of the Phase 2 Landfill is contained by ash/soil berms and is no longer contained by portions of native ground. The north berm has an average elevation of 3,185-ft. The south berm has an average elevation of 3,185-ft. The west berm (located on the east side of the haul road) has an average elevation of 3,188-ft. All perimeter berms for Phase 2 were under construction at the time of the site visit and were not finish graded.

- ii. A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.*

Personnel from Allied Engineering Services, Inc. visited the site on October 23, 2025 for the Annual Engineers Inspection. During the inspection, traditional survey and aerial drone mapping was performed across the site. The 2025 survey information is summarized in Appendix A.

- 2) Inspection report. The qualified professional engineer must prepare a report following each inspection that addresses the following:*
 - i. Any changes in geometry of the structure since the previous annual inspection;*
 - ii. The approximate volume of CCR contained in the unit at the time of the inspection;*
 - iii. Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit; and*

- iv. Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.

The geometry of the landfill is actively changing as CCR is placed in lifts and hydrated. As the CCR surface continues to rise, a minimum of 3H:1V side slope should be maintained. Maintaining 3H:1V side slopes during placement of CCR lifts and construction of perimeter berms will ensure final configuration and reclamation geometry can be achieved. No significant structural weaknesses or stability issues were observed during the annual inspection.

The attached as-built survey sheets depict the topography of the ash surface as of October 23, 2025. The elevation of the ash placed in Phase 2 has risen an average of 5.6-ft since the last as-built survey on November 18, 2024. The general shape of Phase 2 is a depression which captures precipitation within the ash footprint. The average ash elevation of Phase 1 remains the same as the previous years (2018-2024) at 3160-FT. Phase 2 has an average ash elevation of 3179-FT. A total of 74,482 CY of ash was placed in Phase 2 between as-built surveys (11/18/2024 – 10/23/2025). During this same timeframe, approximately 149 CY of ash was sold and not placed in the landfill area.

Landfill Surface Area Table

Description	Surface Area*
Phase 1 Open Ash Area	2.6 Acres
Phase 2 Open Ash Area	8.7 Acres
*Areas are approximate and estimated from topographic data taken on 10/23/2025. Ash volume calculations and surface statistics for Phase 2 have been developed by comparing the 2024 and 2025 ash surface areas.	

Landfill Volumes Table

Description	Volume
Total Ash Stored in Phase 1	344,310 CY
Total Ash Stored in Phase 2	751,994 CY
Estimated Closed Landfill Ash Storage	836,000 CY
Stockpile 1 – Topsoil	6,000 CY
Stockpile 2 – Subsoil	77,046 CY
Stockpile 3 – Topsoil	5,090 CY
Stockpile 4 – Subsoil	8,377 CY
Borrow Area – Southeast Corner Phase 2	155 CY
*Soil volumes are approximate and estimated from topographic data taken on 10/23/2025. Stockpile volumes may have changed since this survey date.	

The Borrow Area contributed approximately 155 CY of material for temporary haul road construction.

All piping installed in 2015, along with the previously existing piping is functioning as designed with in-place trash racks and rock riprap. A small amount of sedimentation was observed at the inlets and outlet of the pipes. This sediment should be removed during routine site maintenance in the coming year and when found moving forward.

3) *Timeframes for conducting the initial inspection -*

- i. *Existing CCR landfills. The owner or operator of the CCR unit must complete the initial inspection required by paragraphs (b)(1) and (2) of this section no later than January 18, 2016.*

The first Annual Inspection report was completed prior to the stated deadline and has therefore addressed this requirement.

- ii. *New CCR landfills and any lateral expansion of a CCR landfill. The owner or operator of the CCR unit must complete the initial annual inspection required by paragraphs (b)(1) and (2) of this section no later than 14 months following the date of initial receipt of CCR in the CCR unit.*

Not applicable to the existing landfill.

- 4) *Frequency of inspections. The owner or operator of the CCR unit must conduct the inspection required by paragraphs (b)(1) and (2) of this section on an annual basis. The date of completing the initial inspection report is the basis for establishing the deadline to complete the first subsequent inspection. Any required inspection may be conducted prior to the required deadline provided the owner or operator places the completed inspection report into the facility's operating record within a reasonable amount of time. In all cases, the deadline for completing subsequent inspection reports is based on the date of completing the previous inspection report. For purposes of this section, the owner or operator has completed an inspection when the inspection report has been placed in the facility's operating record as required by § 257.105(g)(9).*

The Engineer's Inspection Report will continue to be completed annually with the potential to complete them more frequently if a deficiency or release is identified during the weekly facility inspections.

- 5) *If a deficiency or release is identified during an inspection, the owner or operator must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken.*

Acknowledged

CONCLUSION

The landfill inspection at the Rosebud Power Plant found that there is currently no significant or damaging active settlement or significant stability issues related to landfiling of CCR. All existing piping appears to be functioning as designed.

See below for a list of recommendations for continued operation and maintenance of the landfill:

1. Continue grading outward facing slopes for berm construction (2025 and future) to ensure a 3H:1V side slope or flatter geometry. Any existing (2025 or earlier) or future finished slopes steeper than 3H:1V will require flattening from the bottom (i.e., additional fill placement) during final closure. See the attached Slope Figure for existing slopes. Note, areas that are orange and purple represent slopes steeper than 3H:1V.
2. Place soil on any outward facing slopes of berms constructed of CCR as soon as practicable after construction to reduce exposed ash slopes. The minimum required soil cover is 0.5-FT of topsoil and 1.5-ft of subsoil. Topsoil should be applied at the minimum cover requirement to conserve topsoil volumes until final reclamation. Subsoil should be compacted as recommended in the original and post construction design reports.
3. In an effort to conserve topsoil, only use the available topsoil stockpiles for covering 3H:1V slopes as Phase 2 elevation continues to rise.
4. Continue to control or suppress fugitive dust that may occur during the operation of the landfill. Suppression may include water or chemical applications.
5. As ash is placed, ensure berms are in place and grading is sloped toward the center of the landfill to reduce erosion potential near the perimeter.
6. Apply compactive effort to berm material during berm construction in accordance with the 1996 Chandler Geotechnical Engineering Design and Construction Specifications.
7. Perform grading to repair erosion that may be occurring on finished areas to prevent ash from being exposed.
8. Perform seeding of all disturbed areas in the spring or fall to promote vegetation growth on bare ground.
9. For Subsoil Stockpile 2, perform grading to repair erosion and seed eroded areas in the spring or fall to promote vegetation growth on bare ground.
10. Perform routine cleaning and maintenance of the installed piping under the landfill, including inlet and outlet areas. Specifically, remove sediment that has collected at the inlet to Pipe 3 and Pipe 2. Continue periodic cleaning of sediment deposits and vegetation obstructions from drainpipe inlets and outlets and note the days of such maintenance in the weekly inspection reports.
11. Strip and stockpile all topsoil to a minimum depth of 12 inches from all proposed disturbance areas and maintain a 10-foot buffer strip around the perimeter of the landfill. Topsoil and subsoil to be stored separately for final reclamation or ongoing berm construction.

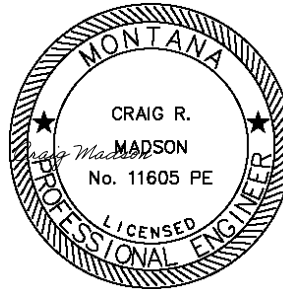
CERTIFICATION

This report was prepared by Allied Engineering Services, Inc., under the direction of Craig R. Madson, PE with assistance from Conner Switzer EI, Andrew Graham, PE, Eric Wegren, PE, Ron Orton, and QC review by Brock Athman, PE.

ALLIED ENGINEERING SERVICES, INC

Craig Madson, PE

Craig Madson



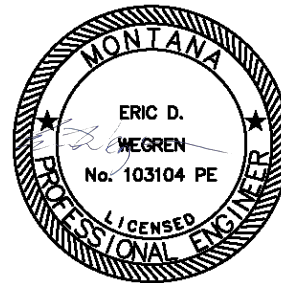
Andrew Graham, PE

Andrew Graham



Eric Wegren, PE

Eric Wegren



Ron Orton, Environmental Scientist

Ron Orton

QC Approval: Brock D. Athman, PE

Brock D. Athman

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6. Natural Resource Conservation Service, Web Soil Survey. <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm> Accessed 12/23/15.
7. Rosebud Power Plant Ash Disposal Site Engineering Design and Construction Specifications by Chandler Geotechnical. Chandler, D.S. dated July 16, 1996.

Appendix A: Existing Conditions Survey, Orthomosaic, & Slopes Figures

LEGEND

- APPROXIMATE ASH PLACEMENT BOUNDARY
--- APPROXIMATE COAL STORAGE BOUNDARY

SURVEY OF PHASE 1 & 2 LANDFILL AND SURROUNDING AREA BASED ON TOPOGRAPHIC SURVEYS COMPLETED ON:
9/14/15 BY GREG FINCK OF AESI
1/27/16 BY GREG FINCK & KYLE THOMPSON OF AESI
11/9/16 BY ANDREW GRAHAM OF AESI
11/14/17 BY ANDREW GRAHAM OF AESI
09/19/18 BY CONNER SWITZER OF AESI
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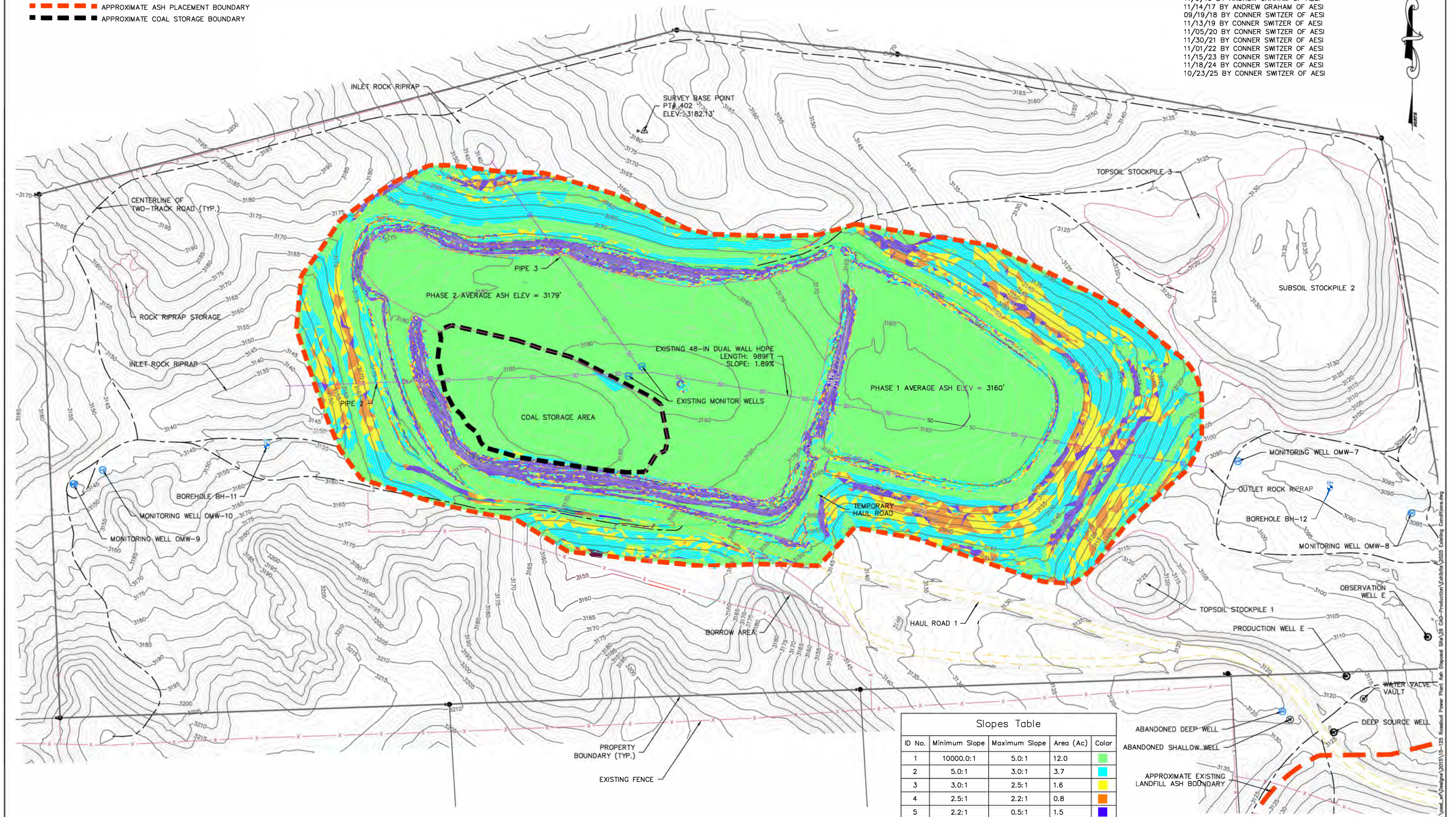


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SURVEY OF PHASE 1 & 2 LANDFILL AND SURROUNDING AREA BASED ON TOPOGRAPHIC SURVEYS COMPLETED ON:
9/14/15 BY GREG FINCK OF AESI
1/27/16 BY GREG FINCK & KYLE THOMPSON OF AESI
11/9/16 BY ANDREW GRAHAM OF AESI
11/14/17 BY ANDREW GRAHAM OF AESI
09/19/18 BY CONNER SWITZER OF AESI
11/13/19 BY CONNER SWITZER OF AESI
11/05/20 BY CONNER SWITZER OF AESI
11/30/21 BY CONNER SWITZER OF AESI
11/01/22 BY CONNER SWITZER OF AESI
11/15/23 BY CONNER SWITZER OF AESI
11/18/24 BY CONNER SWITZER OF AESI
10/23/25 BY CONNER SWITZER OF AESI



Slopes Table				
ID No.	Minimum Slope	Maximum Slope	Area (Ac)	Color
1	10000.0:1	5.0:1	12.0	Green
2	5.0:1	3.0:1	3.7	Blue
3	3.0:1	2.5:1	1.6	Yellow
4	2.5:1	2.2:1	0.8	Orange
5	2.2:1	0.5:1	1.5	Purple












2025 CELP Annual Engineering Report


Final Audit Report

2026-01-14

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