

2025 Surface Impoundment Annual Inspection Report

Colstrip Steam Electric Station

Colstrip, Montana

#117-133207-25001

January 15, 2026

PREPARED FOR

Talen Montana
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1.0 INTRODUCTION

This annual inspection and report were completed for the purpose of providing due diligence by Talen Montana and reasonable assurance of continued safe operation of its coal combustion residual (CCR) facilities. The inspection was performed, and this report was prepared, in accordance with the requirements for annual inspections under Section 257.83 (CCR surface impoundments) of 40 CFR Parts 257 and 261, Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, Final Rule, dated April 17, 2015.

1.1 GENERAL OVERVIEW

The Colstrip Stream Electric Station (CSES), operated by Talen Montana, is a coal-fired power generation facility that has historically managed CCR and associated process water in several engineered surface impoundments. These CCR units include:

- **Units 1 & 2 Stage II Evaporation Ponds (STEP):** Historically used for the management and evaporation of CCR process water and materials associated with Units 1 and 2. These ponds include multiple cells, all of which have ceased receiving CCR material and now only manage stormwater and residual water under controlled conditions.
- **Units 1 & 2 Bottom Ash Pond:** Located within the main plant site area, this impoundment historically received bottom ash sluice water from Units 1 and 2 and ceased receiving in 2020. As of the date of the inspection, Units 1 & 2 Bottom Ash Pond had been closed by removal in October 2025. Approval from DEQ has been obtained to build landfill 2, which is on top of the enclosed bottom ash
- **Units 3 & 4 Effluent Holding Pond (EHP):** A multi-cell surface impoundment system serving Units 3 and 4, used for the management of plant effluent and CCR materials. The J-1 Cell is the only cell currently receiving CCR material under dry handling operations, while other cells manage water only or are inactive.

The surface impoundments are regulated under the Coal Combustion Residuals Rule codified in Title 40 Code of Federal Regulations (CFR) Part 257, Subpart D. The annual inspection documented in this report is conducted to comply with the operating criteria of §257.83(b), which require an annual inspection by a qualified professional engineer to provide reasonable assurance that CCR surface impoundments continue to operate safely and in accordance with recognized and generally accepted good engineering practice. The inspection includes a review of available design, construction, operation, and monitoring documentation, as well as visual inspections of the impoundments and appurtenant structures.

1.2 LOCATION

The CSES is located in Rosebud County in southeastern Montana, near the town of Colstrip. The facility is situated approximately 20 miles south of Forsyth, Montana, and is accessed via local county roads connected to State Highway 39. The plant occupies a large industrial site that includes the power generation facilities as well as multiple CCR management areas distributed around the plant site.

The CCR surface impoundments associated with CSES are located both adjacent to the power generation facility and in areas immediately surrounding the plant site as shown in **Figure 1**. The Units 1 & 2 STEP and the Units 1 & 2 Bottom Ash Pond are located near the original generating units, while the Units 3 & 4 EHP is

located to the east of the main plant facilities. The general location and spatial relationship of these CCR units relative to the power plant are shown on site **Figure 1**

1.3 SUMMARY OF INSPECTION FINDINGS

The 2025 annual inspection of the CCR surface impoundments at the CSES was conducted to provide reasonable assurance of continued safe operation in accordance with 40 CFR §257.83(b). Based on the review of available operating records, visual inspection observations, and evaluation of instrumentation data, conditions observed during the 2025 inspection are consistent with those documented during the 2024 annual inspection.

The CCR units inspected were found to be in satisfactory condition. No conditions were identified that would indicate an active or impending structural instability or dam safety concern. Embankments appeared to be performing as designed, with no observed signs of cracking, sloughing, excessive settlement, seepage, or other indicators of distress beyond minor surficial erosion that does not affect structural integrity.

Instrumentation data reviewed from piezometers, slope inclinometers, and hydraulic structure monitoring elevations and inclinometer readings remain consistent with historical trends and do not indicate adverse changes that would impact the stability or operation of the CCR units.

No significant changes in geometry, operating conditions, or CCR management practices have occurred since the 2024 inspection. Units 1 & 2 Bottom Ash Pond are currently under construction as part of the closure. As such, none of the inspection findings indicate the need for immediate corrective action or modifications to existing monitoring, operation, or maintenance practices. Continued routine inspection and monitoring in accordance with the CCR Rule and facility operation and maintenance plans remain appropriate.

2.0 DESIGN AND OPERATING DOCUMENTATION REVIEW

The list of operating records to be reviewed during the annual inspection as required under §257.83(b)(1)(i) include the following

- CCR unit design and construction information required by §257.73(c)(1) and 257.74(c)(1).
- Previous periodic structural stability assessments required under §§257.73(d) and 257.74(d).
- The results of inspections by a qualified person, and results of previous annual inspections".

The following subsections describe the review of operating record files.

2.1 DESIGN AND CONSTRUCTION INFORMATION

Design and construction information for the CCR surface impoundments at the CSES was reviewed as part of the 2025 annual inspection in accordance with the requirements of 40 CFR §257.83(b)(1)(i). The review included available design reports, construction records, as-built drawings, and historical documentation maintained in the facility operating record and summarized in prior annual inspection reports.

The CCR surface impoundments at CSES—including the Units 1 & 2 STEP, the Units 1 & 2 Bottom Ash Pond, and the Units 3 & 4 EHP—were designed and constructed over multiple phases beginning in the late 1970s and 1980s. Design and construction services were originally performed by Bechtel Power Corporation, with subsequent modifications, upgrades, and documentation prepared by various engineering consultants. Embankments generally consist of engineered earthen fill constructed in accordance with design specifications applicable at the time of construction.

The Units 3 & 4 EHP includes multiple embankment dams and interior dikes constructed to manage plant effluent and CCR materials. Liner systems, cutoff walls, and underdrain features have been incorporated in selected areas as part of CCR compliance upgrades and operational changes. The Units 1 & 2 STEP and the Units 1 & 2 Bottom Ash Pond similarly include engineered embankments and internal dikes designed to safely contain CCR materials and associated water.

Design documentation reviewed during the 2024 annual inspection included, but was not limited to, original design and construction reports, history of construction reports, liner construction documentation, and prior structural stability and safety factor assessments prepared in accordance with the CCR Rule. These documents were relied upon for the 2025 inspection and were not independently re-verified.

Based on the review of available design and construction information, no design or construction deficiencies were identified that would adversely affect the structural integrity or safe operation of the CCR surface impoundments at CSES. The impoundments continue to operate in a manner consistent with their original design intent and subsequent CCR compliance modifications.

2.2 OPERATING INFORMATION

Operating information for the CCR surface impoundments at the CSES was reviewed as part of the 2025 annual inspection in accordance with 40 CFR §257.83(b)(1)(i). This review included evaluation of operating practices, CCR placement activities, water management practices, and inspection and monitoring programs as.

CCR management practices at CSES have changed significantly in recent years due to unit retirements, operational modifications, and implementation of CCR compliance measures. Units 1 & 2 STEP and the Units 1 & 2 Bottom Ash Pond ceased receiving additional CCR material in early 2020. Units 1 & 2 STEP now primarily manage residual materials and stormwater, with water levels actively controlled through pumping and operational oversight. Units 1 & 2 Bottom Ash Pond have been closed by removal in October 2025

Units 3 & 4 EHP remain the only CCR unit actively receiving CCR material. Specifically, the J-1 Cell is currently used for dry CCR disposal operations. Under normal operating conditions, water within J-1 Cell is minimized and actively managed using pumping systems, with water present only intermittently or localized within the cell. Other cells within the EHP system either manage water only or are inactive.

Routine operation of the CCR units includes weekly inspections by qualified plant personnel, monthly inspections by Tetra Tech, and ongoing monitoring of embankment performance using piezometers, slope inclinometers, and hydraulic structure instrumentation. Toe drains, sump systems, and flow measurement devices are used to monitor seepage conditions where applicable. Instrumentation data (vibrating wire piezometers and inclinometers) are reviewed to confirm that groundwater levels and embankment movements remain within acceptable and historically stable ranges.

Based on the review of operating information, CCR surface impoundments at CSES continue to be operated in a manner consistent with their design intent, CCR Rule requirements, and recognized and generally accepted good engineering practice. No operational changes have occurred since the 2024 inspection that would adversely affect the stability, performance, or safety of the CCR units.

2.3 RESULTS OF INSPECTION BY A QUALIFIED PROFESSIONAL ENGINEER

CCR surface impoundments at the CSES are subject to periodic inspections by the Talen Montana staff and Monthly inspections by Tetra Tech. Tetra Tech has reviewed Talen Montana inspection reports. These inspections are documented and retained by Talen Energy.

Review of the results of these inspections did not identify any previously unidentified issues. It is the opinion of the author of this document that the interim inspections and reporting by plant staff are appropriate and adequate, as required by the CCR rules and industry standards, for these CCR impoundments

3.0 ANNUAL INSPECTION

3.1 GENERAL OVERVIEW

A field inspection was conducted on October 21, 2025, by Tetra Tech staff, Jake Conver, PE and Chad Tomlinson, PE. Scott Ward with Talen Montana briefly met with Tetra Tech staff prior to the field inspection to answer questions.

The inspection consisted of walking the embankment crests, upstream and downstream slopes, and accessible toe areas to identify any signs of distress, deterioration, or malfunction of the CCR units. Where applicable, hydraulic structures located beneath or passing through the embankments were also visually inspected to assess structural integrity and continued safe operation.

There were no conditions observed that would indicate an active or impending structural stability concern. No cracking, sloughing, excessive settlement, seepage, or other indicators of embankment distress were observed during the inspection. Hydraulic structures inspected were observed to be in satisfactory condition, with no evidence of compromised structural integrity.

Minor surficial erosion in the form of rills was observed at localized areas along the top of the saddle dam in Units 3 &4 EHP. These rills do not pose a risk to the structural integrity or safe operation of the CCR surface impoundments.

3.2 CHANGES IN GEOMETRY

Tetra Tech confirmed that there have been no apparent visual changes in the geometry Units 1 & 2 STEP, and the Units 3 & 4 EHP. We understand Talen is in the process of obtaining and processing the survey data for the dam crests and that information will not be available at the time of publishing this document. Once the information is available and reviewed, the updated information will be provided in an addendum to this document, to compare the 2024 and current survey data. Units 1 & 2 Bottom Ash Pond was closed by removal in October of 2025 and was under construction for Landfill 2 at the time of inspections, and the 2025 geometry was not reviewed for Units 1 & 2 Bottom Ash. Construction continued in Units 3 & 4 EHP G-1 Cell, but did not impact the geometry of the saddle dam in 2025

3.3 INSTRUMENTATION

Slope inclinometers and piezometers are located within the embankments surrounding the surface impoundments of the CSES facility required by §257.83(B)(2)(II). Results of inclinometer and piezometer monitoring are discussed in the following sections 3.3.1 and 3.3.2. **Figures 2 through 4** show the locations of each inclinometer and piezometer with inclinometer data and results included in **Appendix A** and piezometer data and results included with **Appendix B**.

Data from instrumentation measuring flow rates in toe drains underlying the 3 & 4 EHP Main Dam and the 1 & 2 STEP Main Dam are discussed in Section 3.3.3.

3.3.1 Slope Inclinometers

Slope inclinometers are installed within the embankments associated with the CCR surface impoundments at the CSES to monitor lateral movement and assess embankment stability. A total of 23 slope inclinometers are installed across the facility, including nine at the Units 1 & 2 STEP 14 at the Units 3 & 4 EHP. No changes to the slope inclinometer network or monitoring program have occurred since the previous annual inspection.

Slope inclinometer measurements are collected using a portable Durham Geo Slope Indicator inclinometer system and are obtained at regular intervals consistent with the established monitoring program. Readings are taken at fixed depth increments along the length of each inclinometer casing, and measurements are compared to baseline readings established during prior monitoring events. Data are evaluated using profile change and cumulative displacement plots to identify trends indicative of lateral movement or the development of shear planes.

Review of available inclinometer data for the 2025 inspection period indicates that measured displacements remain small and consistent with historical trends. Inclinometer measurement data are plotted by calculating the change between the current profile and the baseline profile that was collected in February of 2025. Apparent deflections observed in some inclinometer plots are attributed to instrument-related bias shift or minor measurement variability rather than actual embankment movement. No discrete shear zones or progressive displacement patterns indicative of slope instability have been identified. Data from monthly Inclinometer readings are presented in **Appendix A**.

Based on the review of slope inclinometer data, the embankments associated with the CCR surface impoundments continue to perform as intended. Inclinometer monitoring results do not indicate conditions that would adversely affect embankment stability or the safe operation of the CCR units.

3.3.2 Piezometer Monitoring

Piezometer instrumentation is installed within the embankments of the CCR surface impoundments at CSES to monitor groundwater conditions and pore water pressures. The monitoring network includes a combination of vibrating wire (VW) piezometers and standpipe piezometers distributed across the Units 1 & 2 STEP, Units 1 & 2 Bottom Ash Pond, and Units 3 & 4 EHP. No changes to the piezometer network or monitoring program have occurred since the previous annual inspection except for PONDA-09-3P and BOTASH-09-1P, which were taken out of service during the closure of Units 1 & 2 Bottom Ash Pond.

Piezometric data are collected monthly and evaluated relative to historical trends, pond water surface elevations, and embankment geometry. VW piezometers measure pore water pressure and are converted to groundwater elevations, while standpipe piezometers are measured manually using electronic water level meters. Instrument locations and monitoring histories are documented in prior annual inspection reports and maintained in the facility operating record. Data from monthly piezometer readings are presented in **Appendix B**.

Review of piezometer data for the 2025 inspection period indicates that groundwater levels within the embankments remain generally stable and consistent with previous years. Many piezometers continue to

record dry conditions, particularly in embankments with liner systems and cutoff walls. Where water levels are present, measured elevations do not indicate elevated pore pressures or adverse seepage conditions.

Piezometer A-24-P21 located in Units 3 & 4 EHP was not measured in February, June or September, it was mistaken for an abandoned adjacent piezometer. Piezometer readings in May for Units 1 & 2 Bottom Ash bonds appear to be an isolated anomaly but returned to normal readings and was likely caused by operator or instrument error.

Overall, piezometric monitoring data do not indicate conditions that would adversely affect embankment stability. Groundwater conditions remain consistent with design intent and recognized and generally accepted good engineering practice for CCR surface impoundments.

3.3.3 Hydraulic Structure Instrumentation

Hydraulic structure instrumentation at the CSES includes monitoring of toe drain systems and associated flow measurement devices installed at selected CCR surface impoundment embankments. These systems are used to monitor seepage conditions and confirm continued safe and reliable performance of embankment dams.

Toe drain flumes associated with the Units 3 & 4 EHP Main Dam and Saddle Dam, as well as the Units 1 & 2 STEP Main Dam, are visually inspected on a weekly basis by plant personnel and during monthly inspections by qualified Tetra Tech staff. Visual observations during routine inspections indicate that water observed in the toe drain systems remains clear and free of suspended solids. The Saddle Dam toe drain at the EHP is typically observed to be dry.

Flow rates from the STEP Main Dam toe drain are measured with a sump collection system. Water flowing out of. The system records water output and the time the pump is active. Available flow data indicate that calculated flow rates remain within historical ranges, ranging from an average of a low of 0.4 gpm in June and high of to 1,0 gpm in Julye and do not exhibit trends indicative of increasing seepage or embankment distress Flow from the Units 3 & 4 EHP Main Dam toe drain is measured using a permanently installed flow meter. Recorded flow rates are reviewed as part of routine inspection and monitoring activities. Available flow data indicate that measured flow rates remain within historical ranges, ranging from a low of 3.27 gpm in September and high of 6.84 gpm in February and do not exhibit trends indicative of increasing seepage or embankment distress.

Based on the review of hydraulic structure instrumentation and associated flow data, seepage conditions at the CCR surface impoundments remain stable and consistent with prior inspections. Hydraulic structure monitoring results do not indicate conditions that would adversely affect embankment stability or the safe operation of the CCR units.

3.4 MINIMUM, MAXIMUM, AND PRESENT DEPTH AND ELEVATION

Impounded water elevations and depths for the CCR surface impoundments at the CSES were evaluated in accordance with 40 CFR §257.83(b)(2)(iii). Based on current operating practices, only limited areas within the Units 1 & 2 STEP and the Units 3 & 4 EHP contain both CCR material and water.

Water levels within these units are actively managed through pumping and operational controls, with the intent of minimizing standing water. Minimum and maximum water elevations are not continuously recorded for all cells; therefore, the present water elevations are considered representative of current operating conditions. Conditions in 2025 are consistent with those documented during the 2024 inspection.

3.5 STORAGE AND CAPACITY VOLUME

Impounded volumes of CCR material and water were evaluated in accordance with §257.83(b)(2)(v). Volume estimates are based on available survey data, design documentation, and operating records maintained by the facility. For the 2025 inspection, impounded volumes are from those reported during the 2024 annual inspection, as no changes in CCR placement or operating conditions are assumed to have occurred.

The Units 1 & 2 STEP E Cell continues to contain residual CCR material and limited stormwater. The EHP J-1 Cell remains the only unit actively receiving CCR material under dry disposal operations. Units 1 & 2 Bottom Ash Ponds had been closed by removal in October 2025

Table 3.1 Estimated Impounded Volumes

CCR Unit / Cell	Estimated Storage Capacity (yd ³)	Estimated Impounded Volume (yd ³)
STEP – E-Cell	1,330,000	1,280,000
EHP – J-1 Cell	2,089,000	2,033,000

3.6 APPEARANCE OF STRUCTURAL WEAKNESS

Observed conditions at the CCR surface impoundments were evaluated during the 2025 inspection to identify any actual or potential weaknesses that could adversely affect the structural integrity or safe operation of the units. This evaluation was based on visual inspection observations, review of instrumentation data, and comparison with conditions documented during previous annual inspections.

No conditions were observed that would indicate an active or impending structural stability concern. No cracking, sloughing, excessive settlement, uncontrolled seepage, or other signs of distress were identified. Minor surficial erosion was observed along the top of the Units 3 & 4 EHP Saddle dam; however, these conditions are considered typical for earthen embankments and do not affect structural performance.

Based on the observations summarized above, no corrective actions are required at this time. Continued routine inspection, monitoring, and maintenance in accordance with the facility Operation and Maintenance Plan and CCR Rule requirements remain appropriate.

3.7 OTHER CHANGES

Observed changes since the previous annual inspection were evaluated in accordance with 40 CFR §257.83(b)(2)(vii). This evaluation included review of operating records, inspection documentation, and visual observations, and comparison with conditions documented during the 2024 annual inspection.

No material changes in embankment geometry, operating conditions, CCR management practices, or instrumentation configuration have occurred since the 2024 inspection. The CCR surface impoundments at the Colstrip Steam Electric Station continue to operate under the same conditions and configurations previously documented.

Minor surficial erosion observed during prior inspections is assumed to persist; however, these conditions are considered typical for earthen embankments and do not represent a change in condition or performance. No new features or conditions were identified that would affect the stability or operation of the CCR units.

Table 3.3 Summary of Observed Changes from 2024 to 2025

CCR Unit	2024 Condition	2025 Condition	Change Observed
Units 1 & 2 STEP	Minor surficial erosion	Minor surficial erosion	No change
Units 1 & 2 Bottom Ash Pond	Stable conditions	Stable conditions	Construction Activities, Closure by removal in progress
Units 3 & 4 EHP	Minor surficial erosion	Minor surficial erosion	No change
Instrumentation	Stable, functioning	Stable, functioning	No change

4.0 LIMITATIONS

This report presents observations and conclusions drawn from a review of pertinent documents referenced field inspection CSES. The purpose of the review and inspection is to assess the safety or adequacy of the facilities according to industry standards against catastrophic failure of the major constructed elements during normal operations or unusual or extreme events based on visual inspection and available information. A secondary purpose is to identify any potential deficiencies related to the CCR rules.

The conclusions and professional opinions presented herein were developed by the independent consultant and are in accordance with generally accepted engineering principles and practices at the time and location the services were provided. Tetra Tech makes no other warranty, either express or implied

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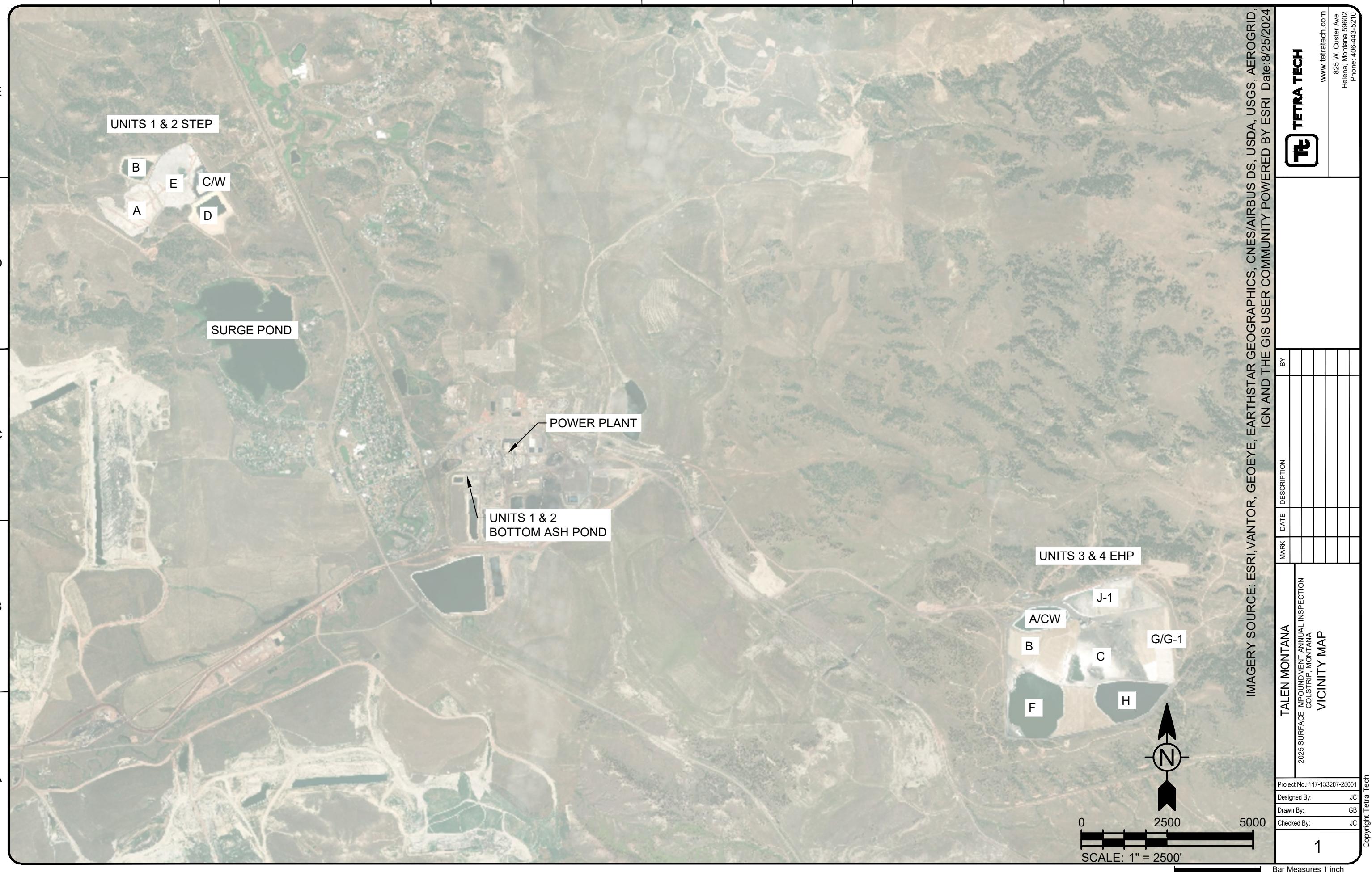
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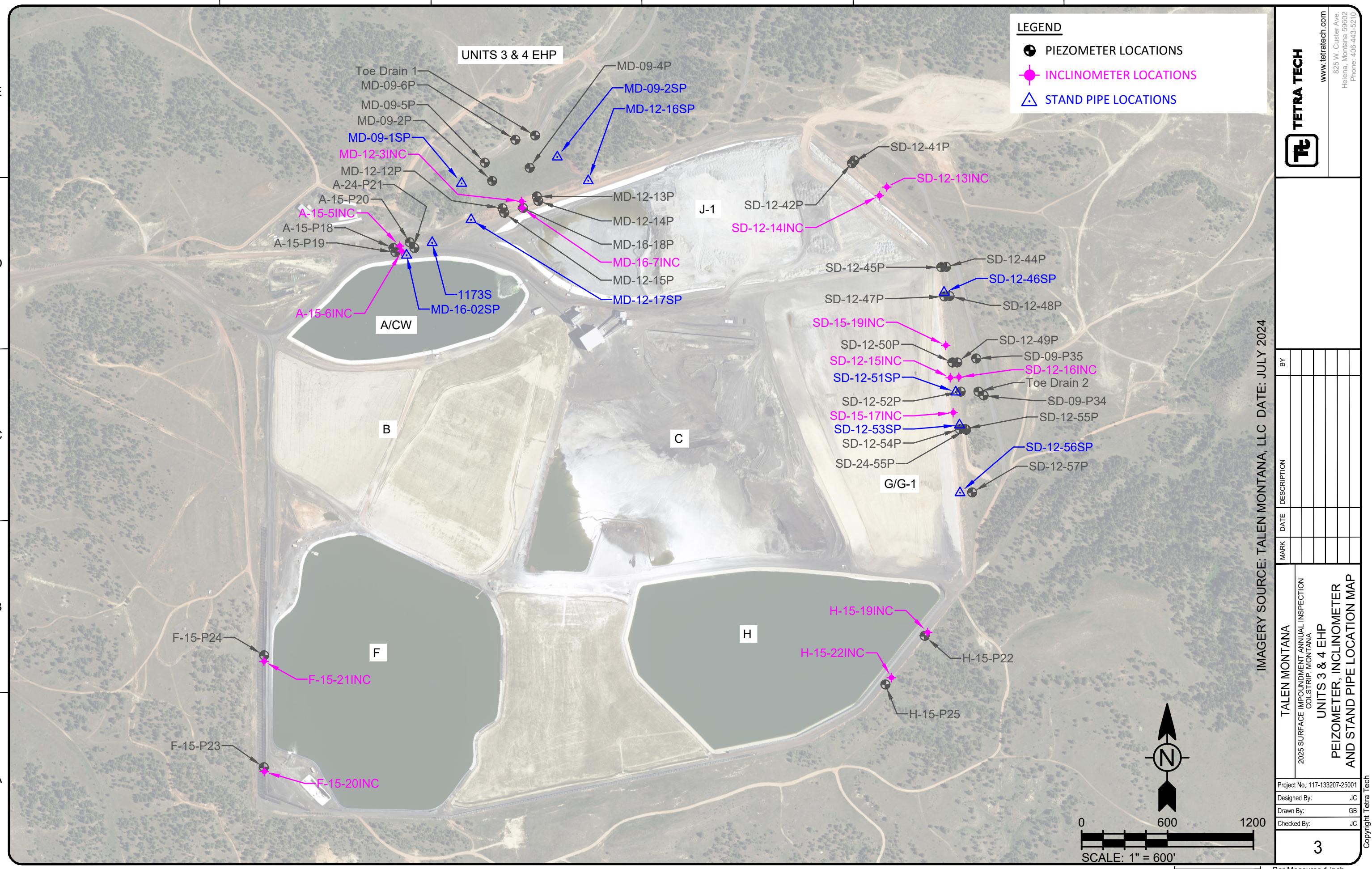
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Figures



1 | 2 | 3 | 4 | 5 | 6



1 | 2 | 3 | 4 | 5 | 6

This map displays the location of various monitoring points (Piezometers, Inclinometers, and Stand Pipes) within the Units 1 & 2 STEP area. The map is overlaid with a grid (A-E on the Y-axis, 0-1000 on the X-axis) and includes a north arrow and a scale bar (0-1000'). The map also shows the 2019D and C/W areas, as well as several red-lined structures. The legend indicates the following symbols:

- PIEZOMETER LOCATIONS
- INCLINOMETER LOCATIONS
- △ STAND PIPE LOCATIONS

Key monitoring points labeled on the map include:

- STEP-09-6P
- STEP-09-2P
- STEP-09-1P
- E/C-15-3INC
- STEP-09-1INC
- STEP-09-3P
- STEP-09-8P
- STEP-09-7P
- Toe Drain 3
- STEP-09-4P
- STEP-09-5P
- B/E-15-P9
- B/E-15-4INC
- B/E-15-P10
- STEP-09-2INC
- C/W
- 2019D
- CW/D-15-6INC
- E/D-15-P11
- E/D-15-5INC
- D-15-8INC
- D-15-9INC
- D-15-P14
- 952D
- D-15-P13
- E/D-15-P12
- D-15-7INC

Project Information:

IMAGERY SOURCE: TALEN MONTANA, LLC DATE: JULY 2024

TALEN MONTANA
2025 SURFACE IMPOUNDMENT ANNUAL INSPECTION
COLSTRIP MONTANA
UNITS 1 & 2 STEP AREA
PIEZOMETER, INCLINOMETER
AND STAND PIPE LOCATION MAP

Project No.: 117-133207-25001
Designed By: JC
Drawn By: GB
Checked By: JC

TETRA TECH
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Helena, Montana 59602
Phone: 406-443-5210

SCALE: 1" = 500'

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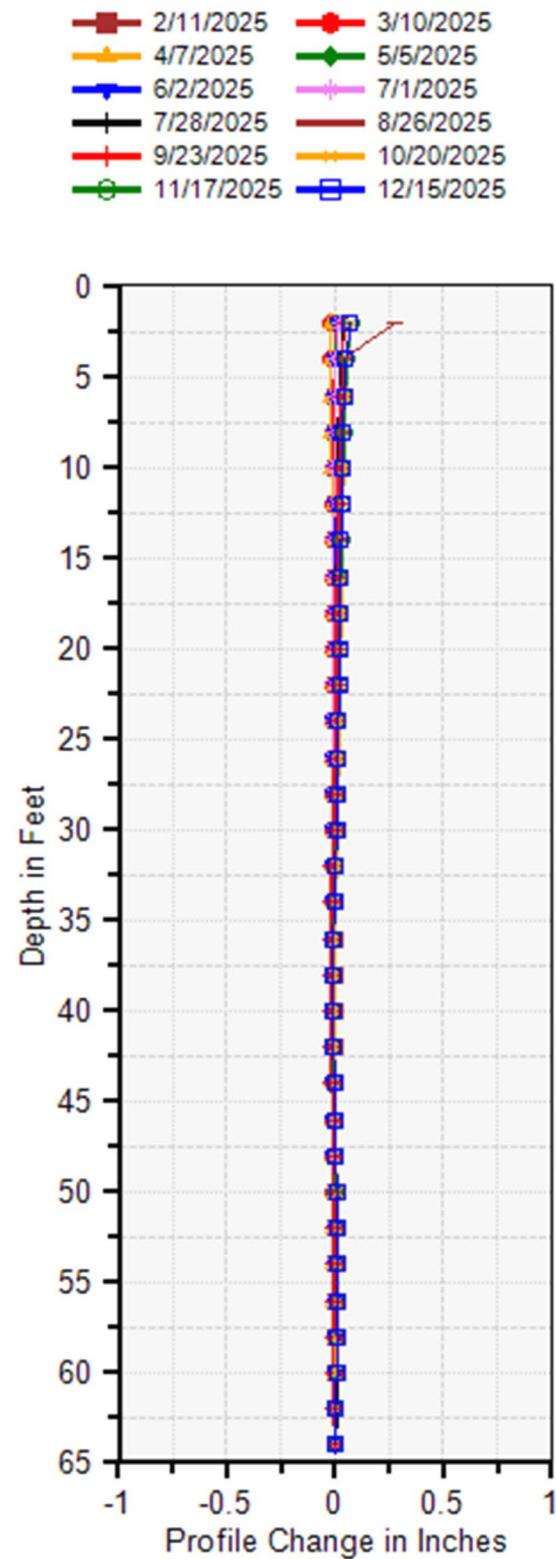
Appendix A – Inclinometer Data



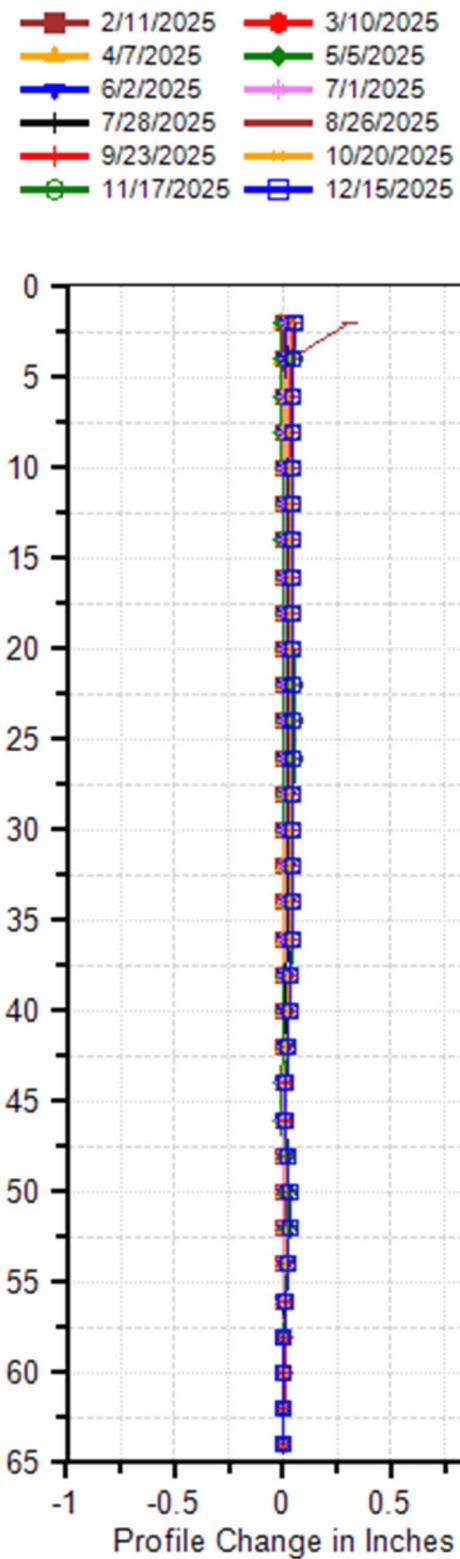
APPENDIX A

Units 1 & 2 STEP Main Dam Inclinometer Plots

STEP 09-1INC A

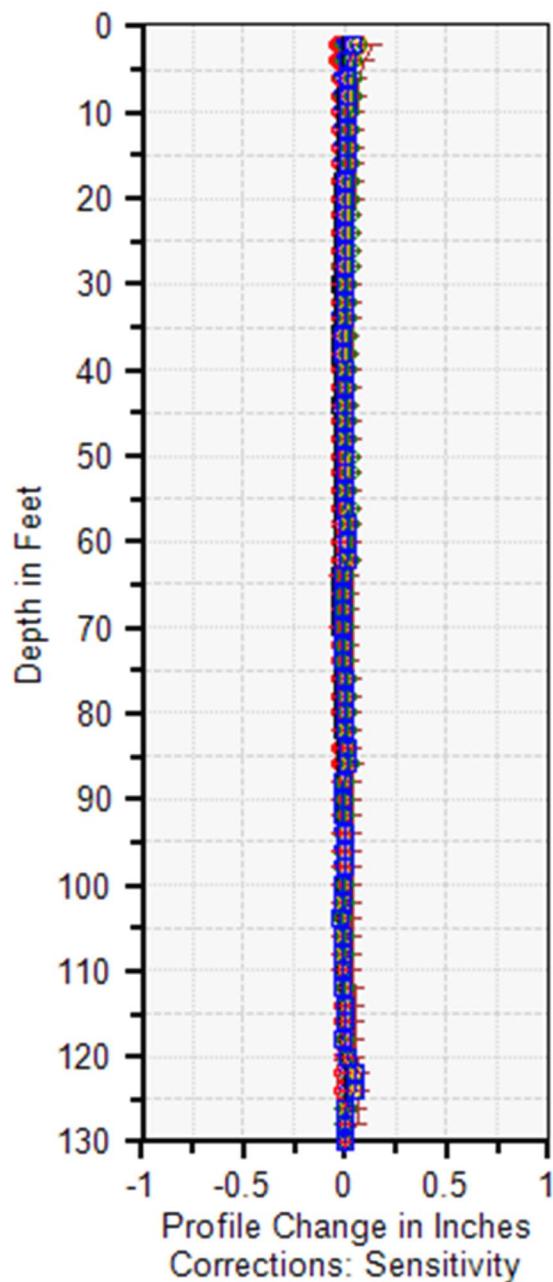


STEP 09-1INC B



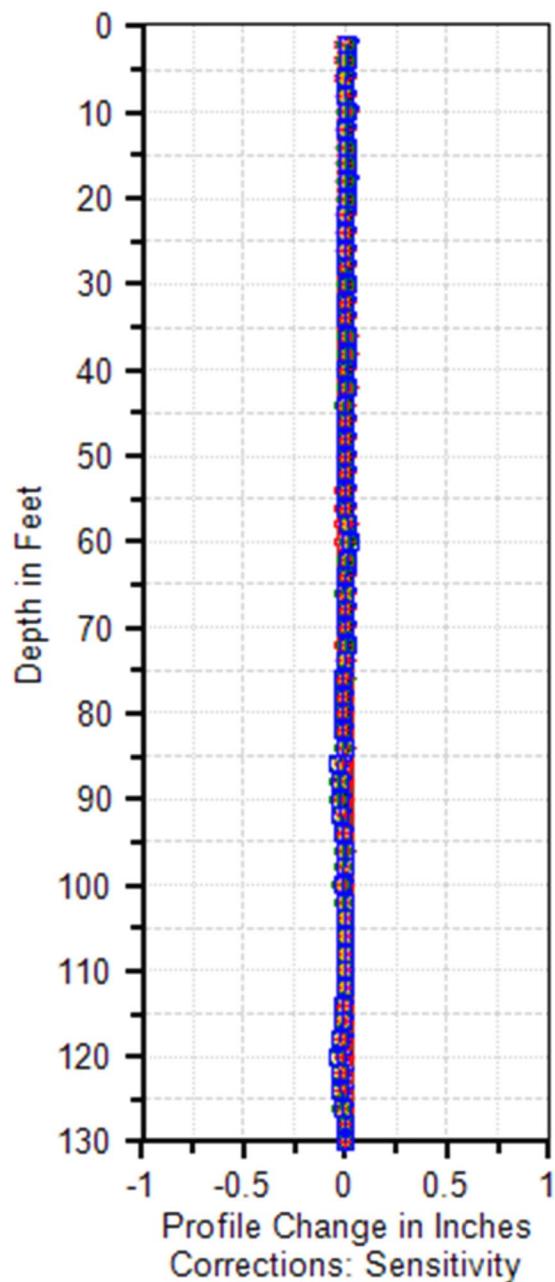
STEP 09-2INC A

- 2/11/2025
- ▲ 4/7/2025
- 6/2/2025
- 7/28/2025
- 9/23/2025
- 11/17/2025
- 3/10/2025
- ◆ 5/5/2025
- 7/1/2025
- 8/26/2025
- 10/20/2025
- 12/15/2025



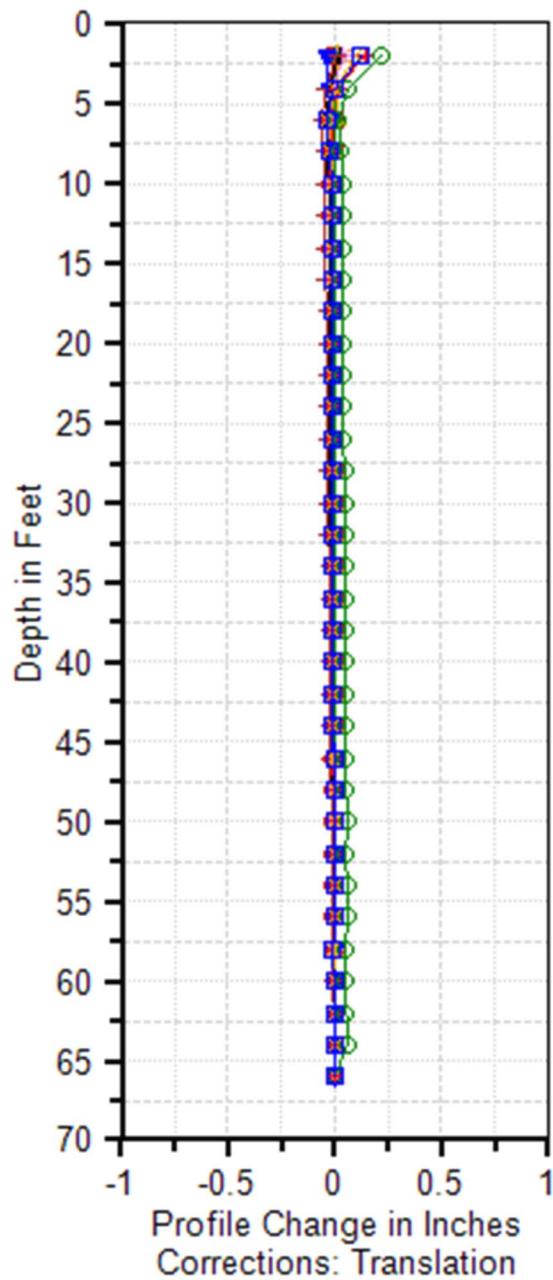
STEP 09-2INC B

- 2/11/2025
- ▲ 4/7/2025
- 6/2/2025
- 7/28/2025
- 9/23/2025
- 11/17/2025
- 3/10/2025
- ◆ 5/5/2025
- 7/1/2025
- 8/26/2025
- 10/20/2025
- 12/15/2025



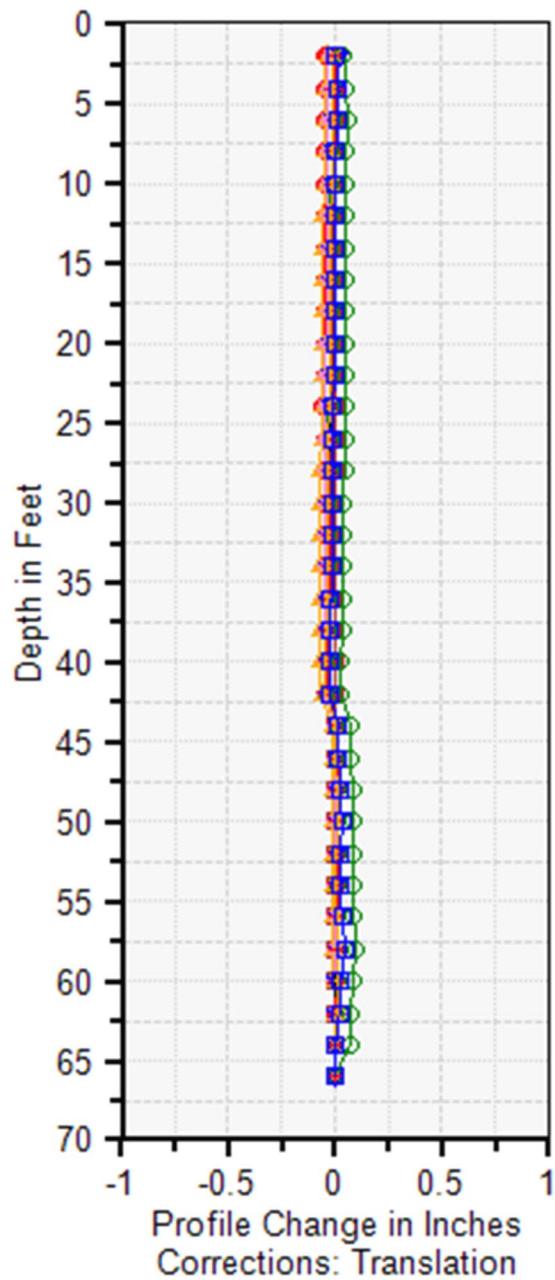
STEP E/C 15-3INC A

■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



STEP E/C 15-3INC B

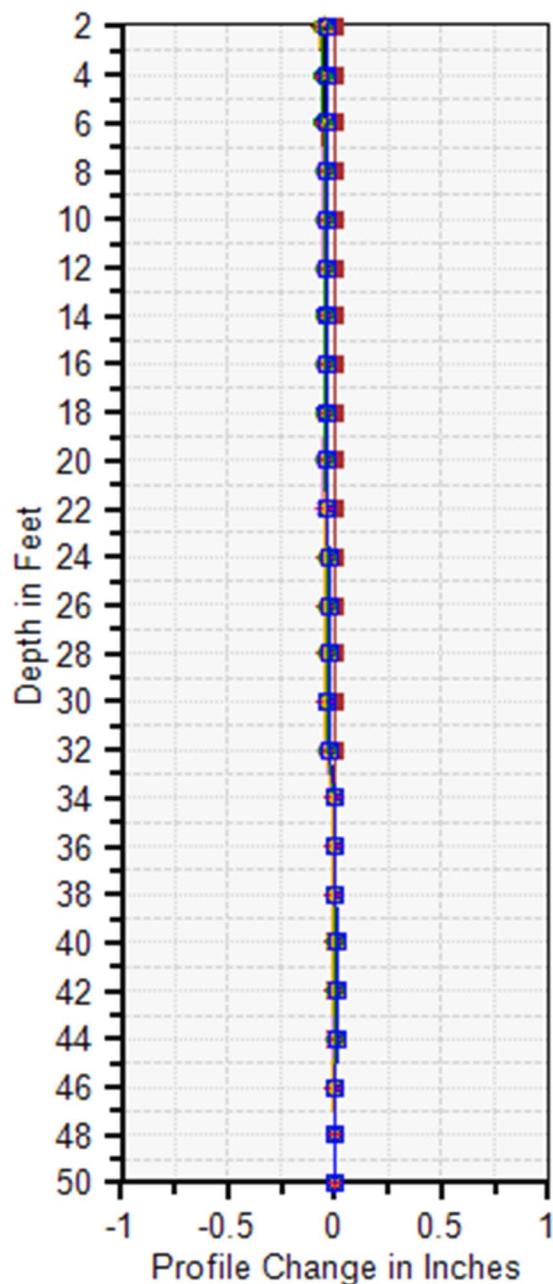
■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



Translation Correction - November survey

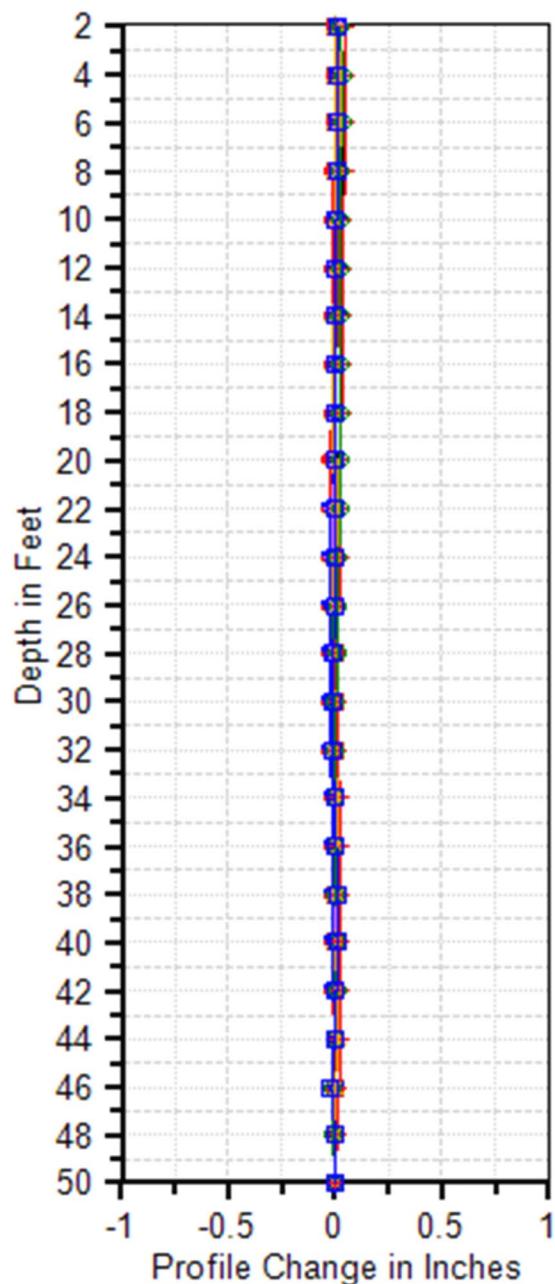
STEP B/E 15-4INC A

■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



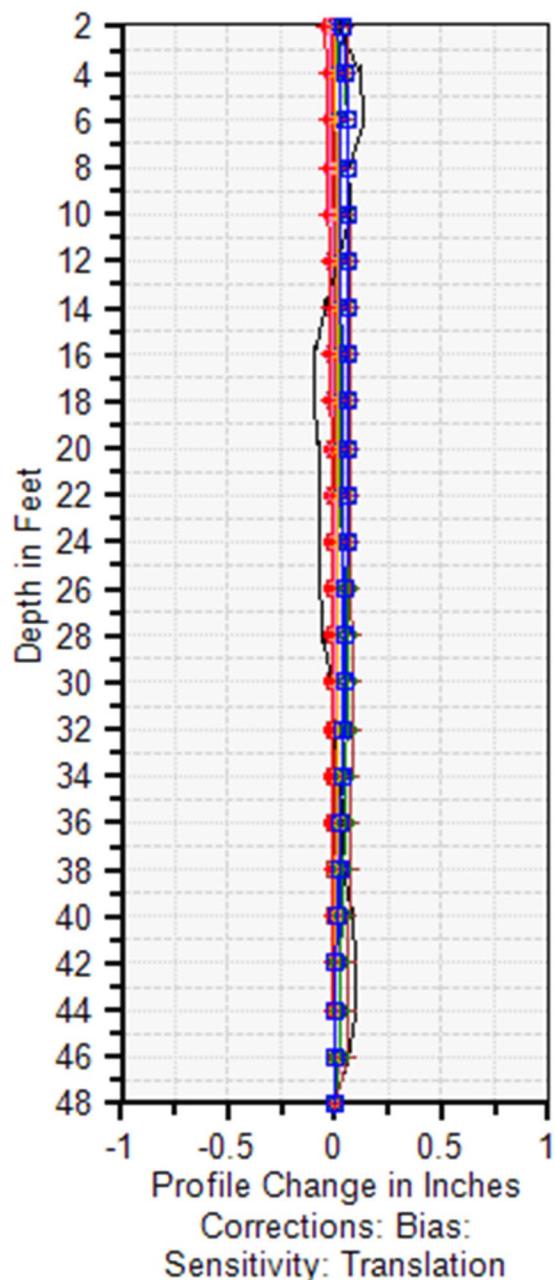
STEP B/E 15-4INC B

■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



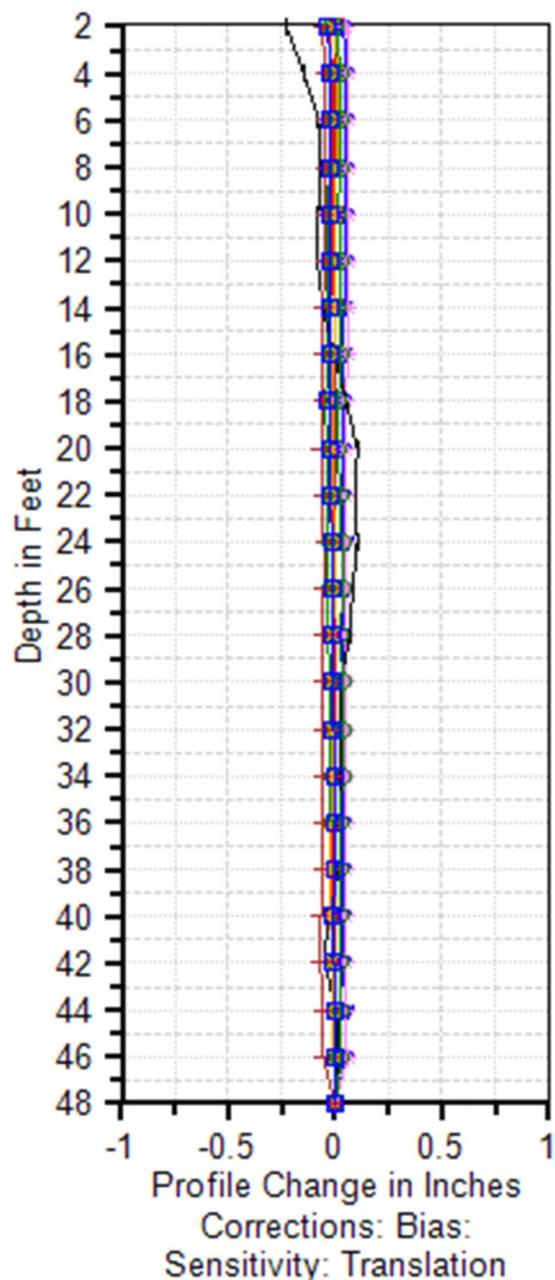
STEP E/D-15-5INC A

2/11/2025	3/10/2025
4/7/2025	5/5/2025
6/2/2025	7/1/2025
7/28/2025	8/26/2025
9/23/2025	10/20/2025
11/17/2025	12/15/2025



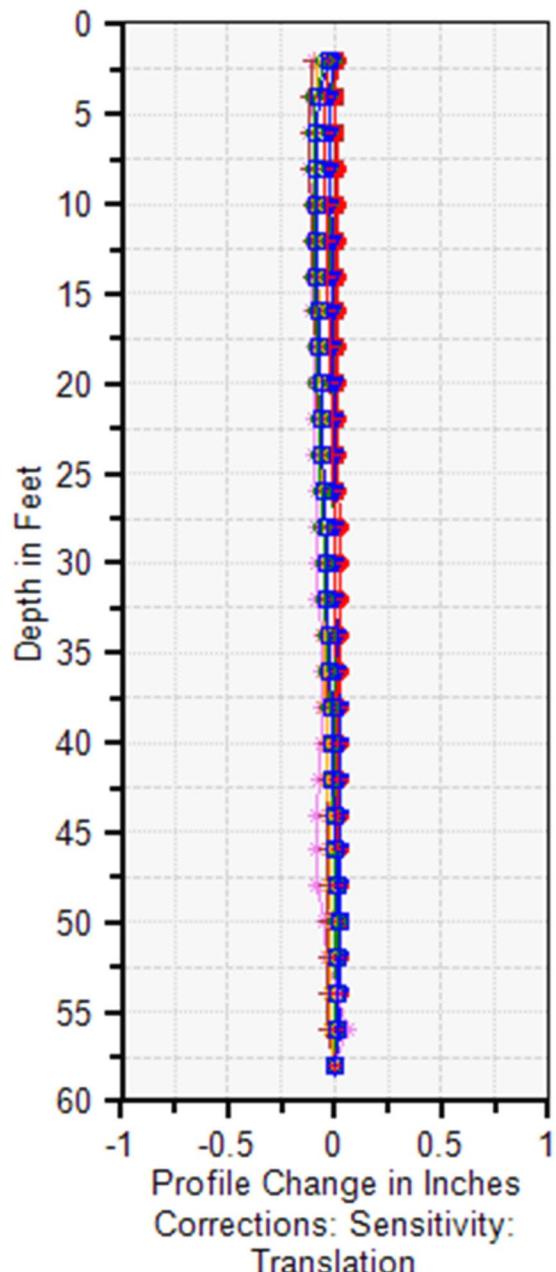
STEP E/D-15-5INC B

2/11/2025	3/10/2025
4/7/2025	5/5/2025
6/2/2025	7/1/2025
7/28/2025	8/26/2025
9/23/2025	10/20/2025
11/17/2025	12/15/2025



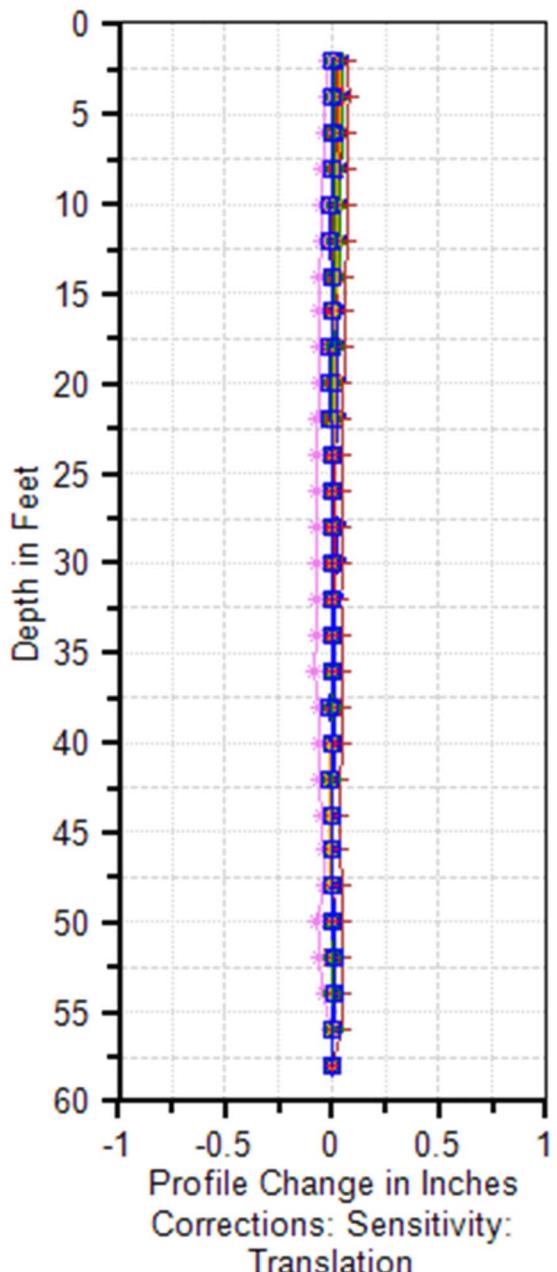
STEP CW/D-15-6INC A

■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



STEP CW/D-15-6INC B

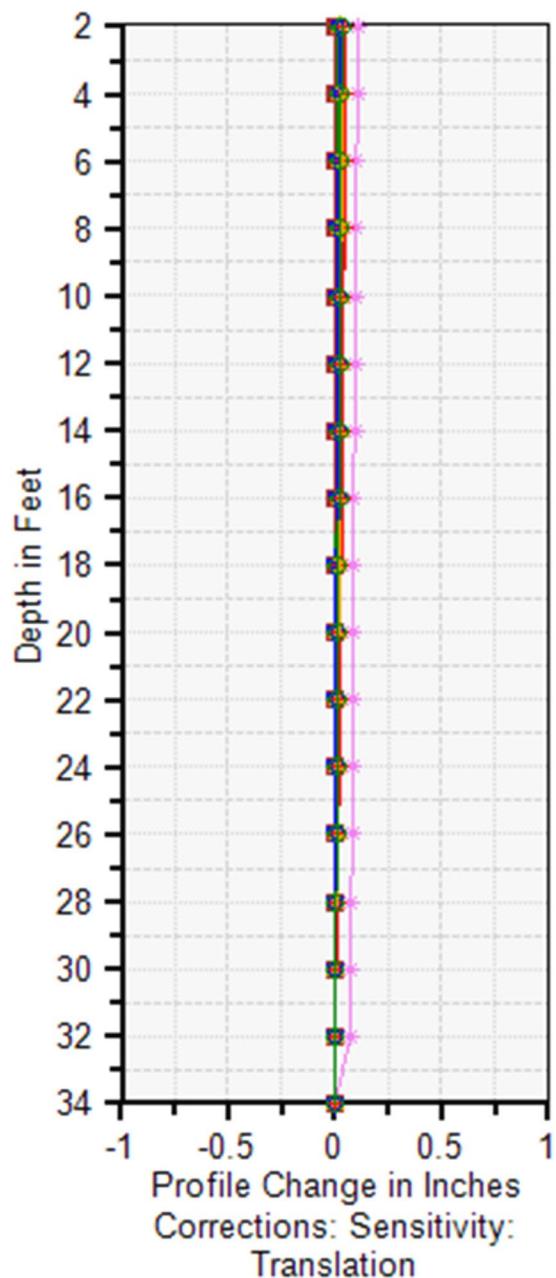
■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



Sensitivity Correction - April survey | Translation Correction - July 28th, August, and October survey

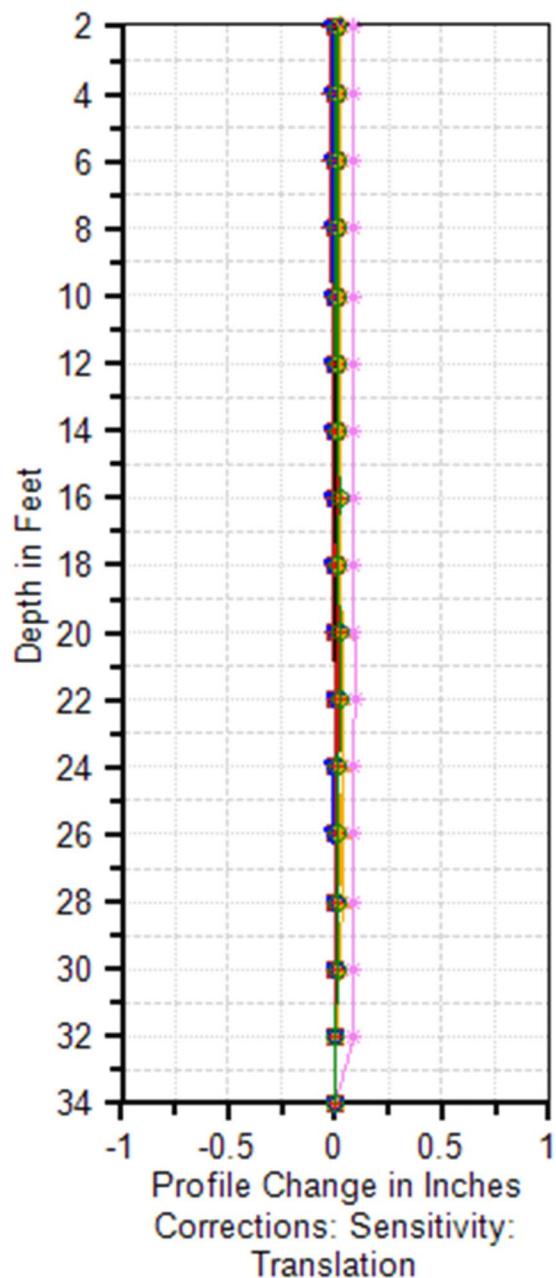
STEP D-15-7INC A

■ 3/10/2025 ■ 4/7/2025
▲ 5/5/2025 ■ 6/2/2025
■ 7/1/2025 ■ 7/28/2025
+ 8/26/2025 ■ 9/23/2025
+ 10/20/2025 ■ 11/17/2025
○ 12/15/2025



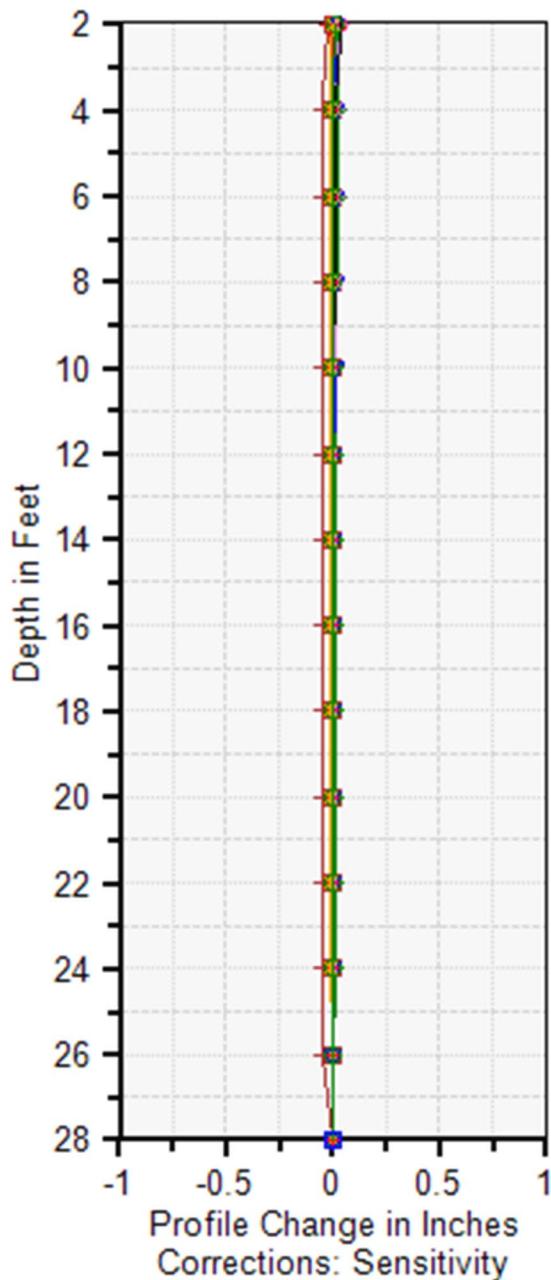
STEP D-15-7INC B

■ 3/10/2025 ■ 4/7/2025
▲ 5/5/2025 ■ 6/2/2025
■ 7/1/2025 ■ 7/28/2025
+ 8/26/2025 ■ 9/23/2025
+ 10/20/2025 ■ 11/17/2025
○ 12/15/2025



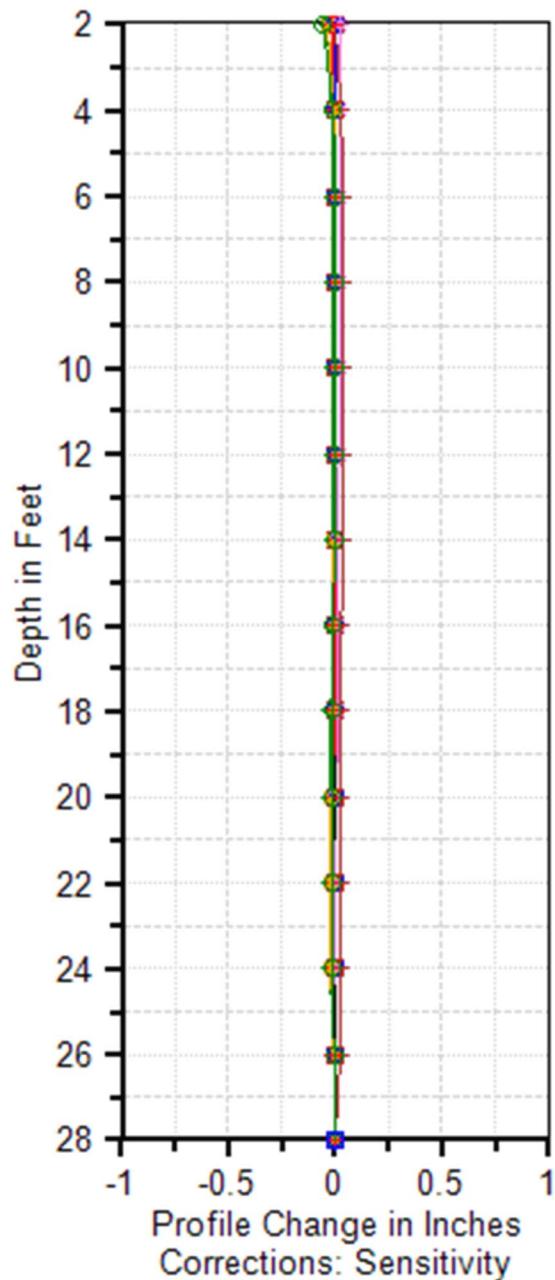
STEP D-15-8INC A

■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



STEP D-15-8INC B

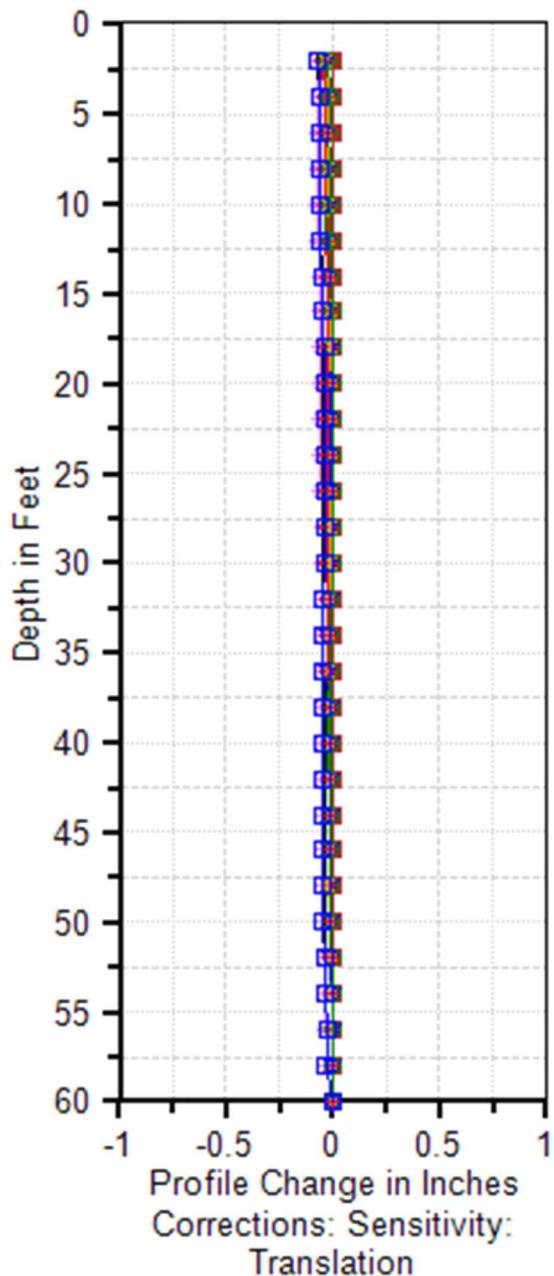
■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



Sensitivity Correction - April survey

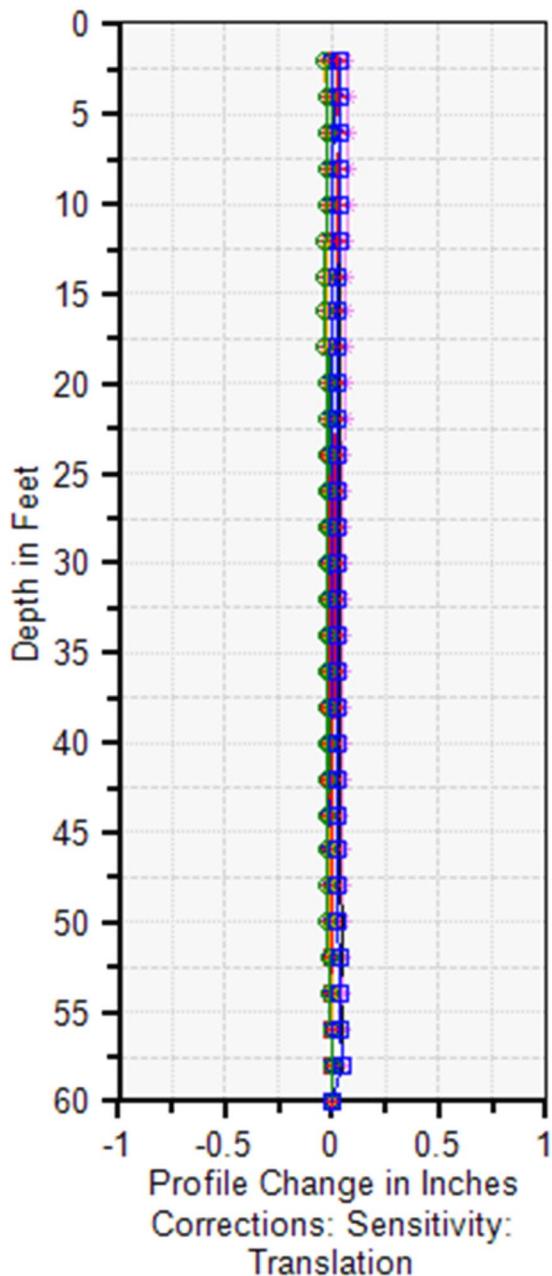
STEP D-15-9INC A

■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



STEP D-15-9INC B

■ 2/11/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/23/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



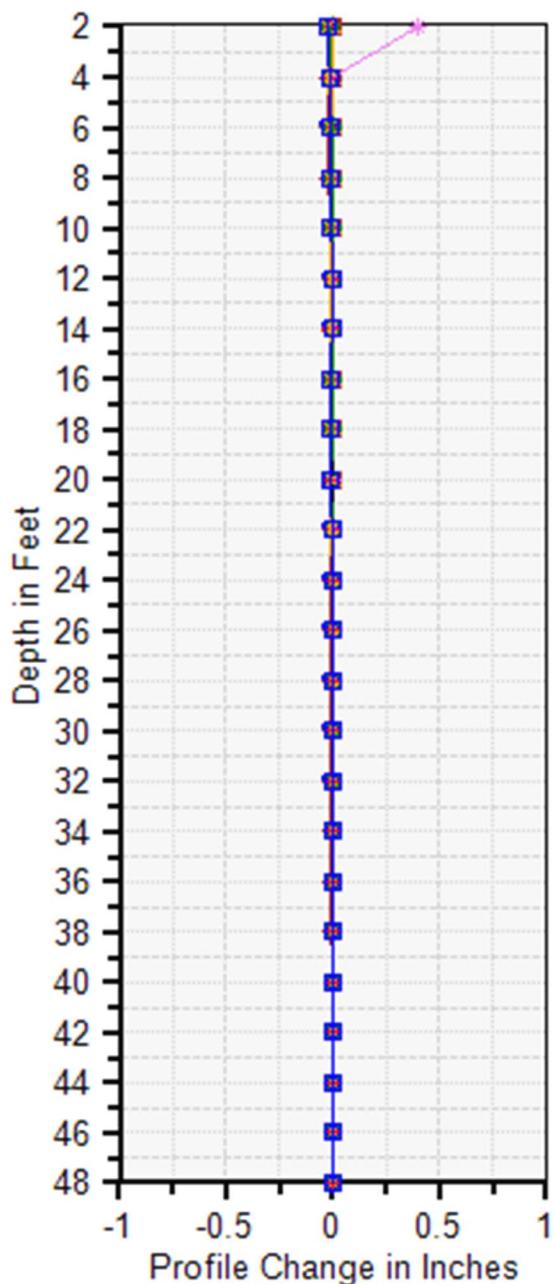
Sensitivity Correction - April survey | Translation Correction - December survey



Units 3 & 4 EHP Main Dam / Saddle Dam Inclinometer Plots

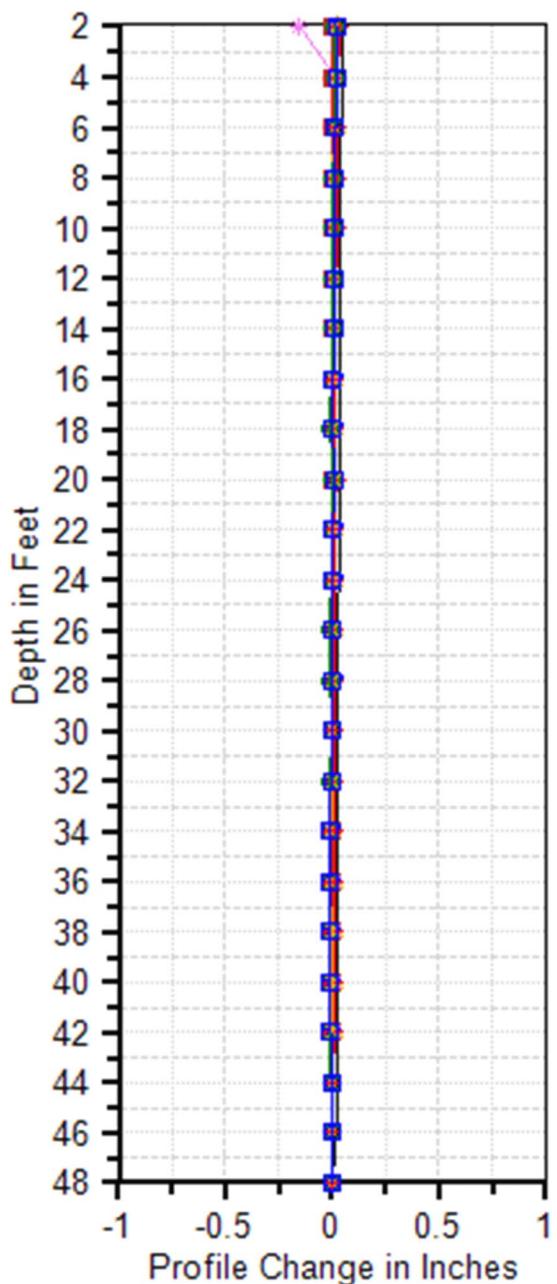
EHP A-15-5INC A

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



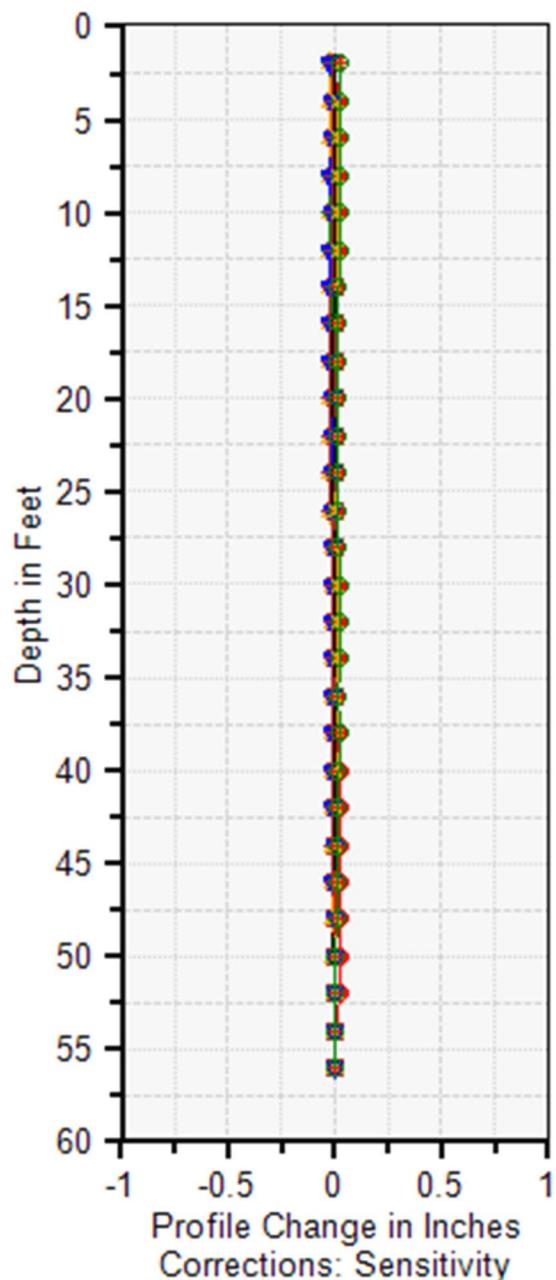
EHP A-15-5INC B

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



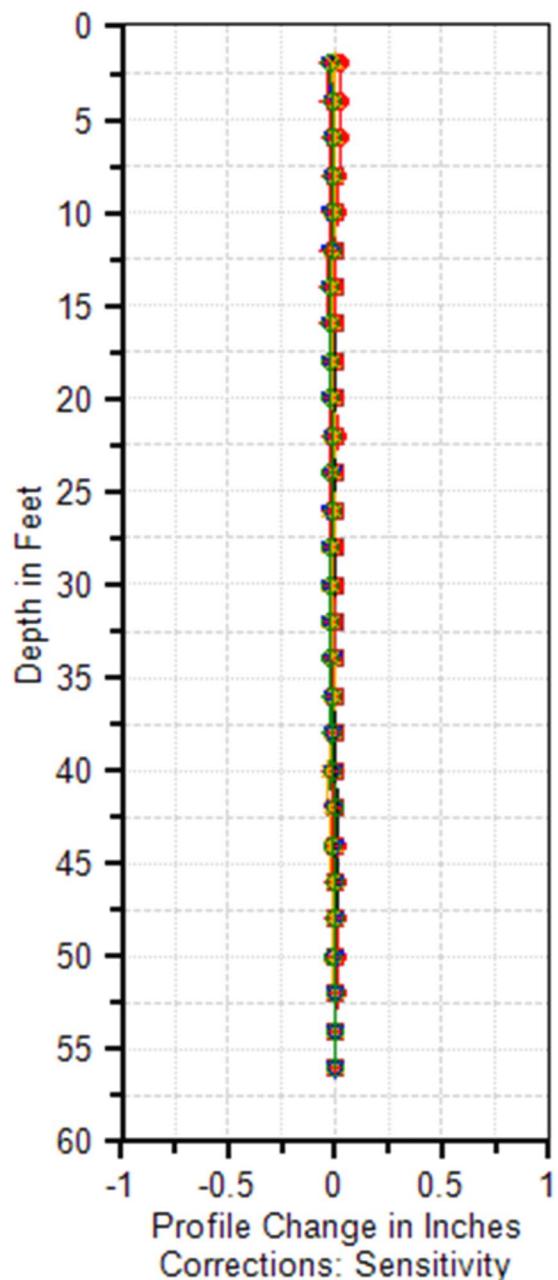
EHP A-15-6INC A

■ 3/10/2025 ■ 4/7/2025
▲ 5/5/2025 ■ 6/2/2025
■ 7/1/2025 ■ 7/28/2025
+ 8/26/2025 ■ 9/22/2025
+ 10/20/2025 ■ 11/17/2025
○ 12/15/2025



EHP A-15-6INC B

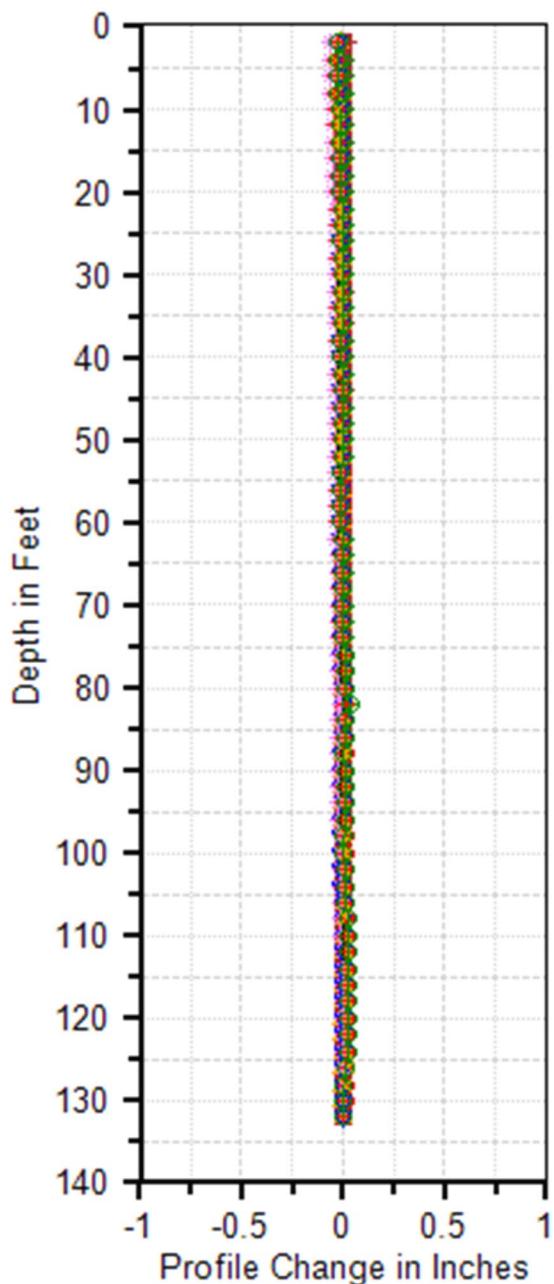
■ 3/10/2025 ■ 4/7/2025
▲ 5/5/2025 ■ 6/2/2025
■ 7/1/2025 ■ 7/28/2025
+ 8/26/2025 ■ 9/22/2025
+ 10/20/2025 ■ 11/17/2025
○ 12/15/2025



Sensitivity Correction - April survey

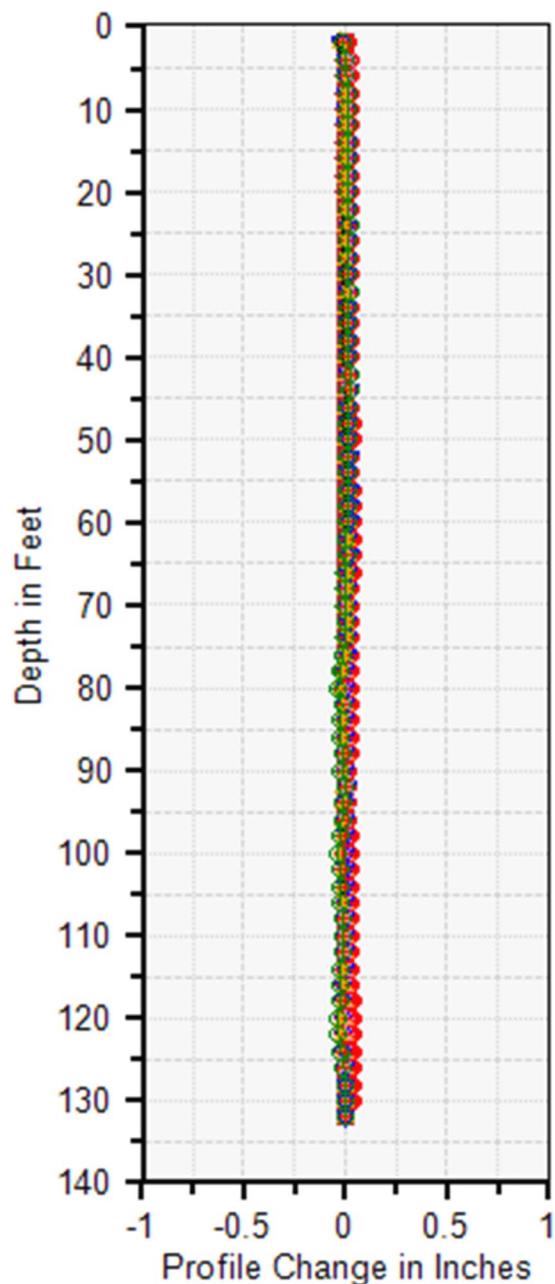
MD-12-3INC A

■ 3/10/2025 ■ 4/7/2025
▲ 5/5/2025 ■ 6/2/2025
■ 7/1/2025 ■ 7/28/2025
+ 8/26/2025 ■ 9/22/2025
+ 10/20/2025 ■ 11/17/2025
○ 12/15/2025



MD-12-3INC B

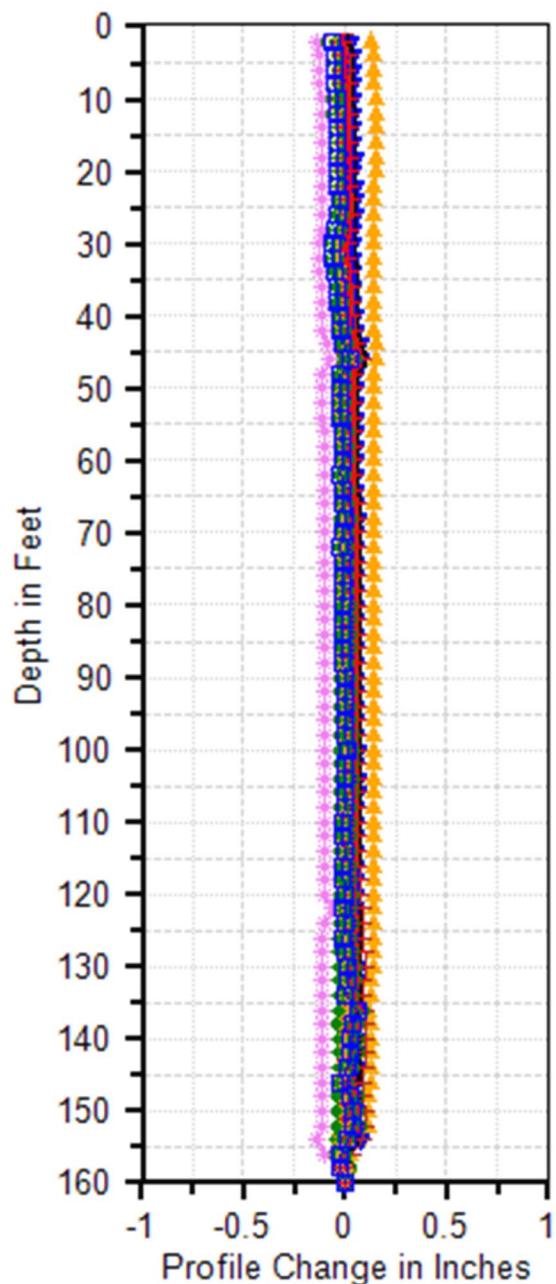
■ 3/10/2025 ■ 4/7/2025
▲ 5/5/2025 ■ 6/2/2025
■ 7/1/2025 ■ 7/28/2025
+ 8/26/2025 ■ 9/22/2025
+ 10/20/2025 ■ 11/17/2025
○ 12/15/2025



Issue with baseline survey in February, March used as baseline.

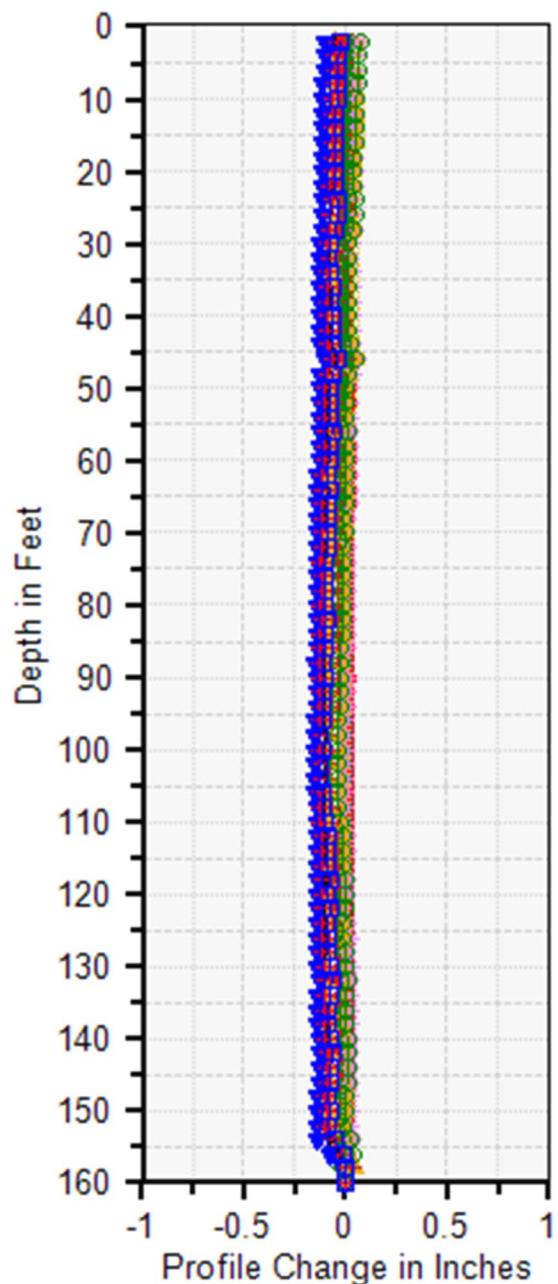
EHP MD-16-7INC A

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025

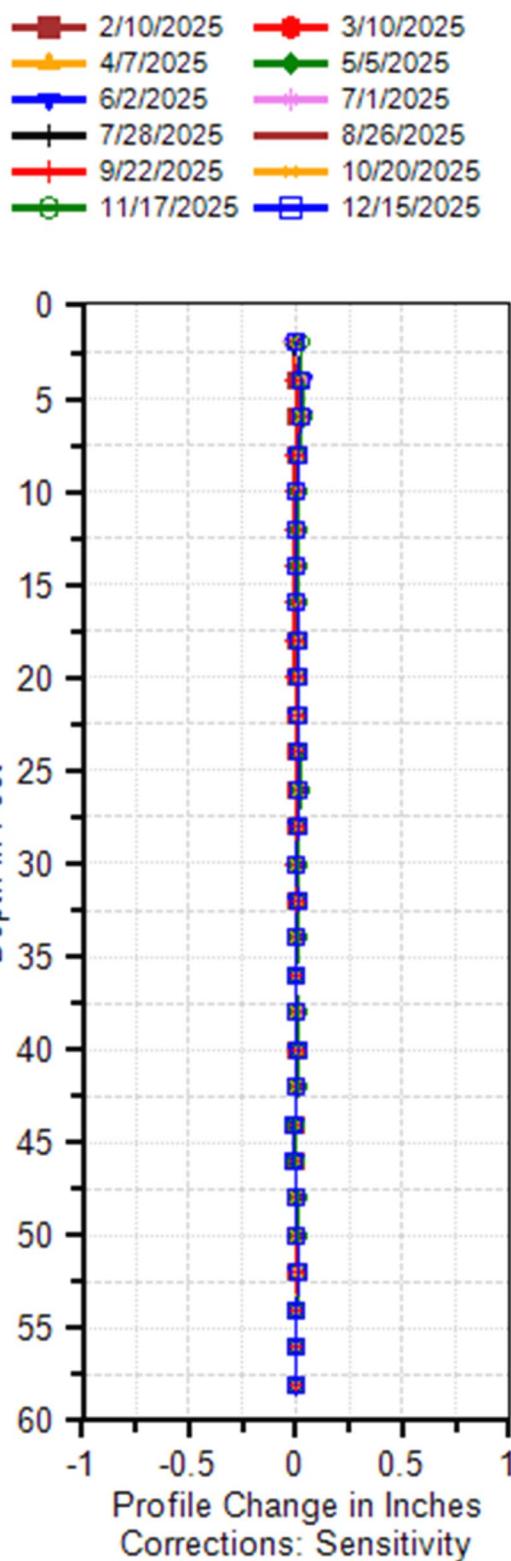


EHP MD-16-7INC B

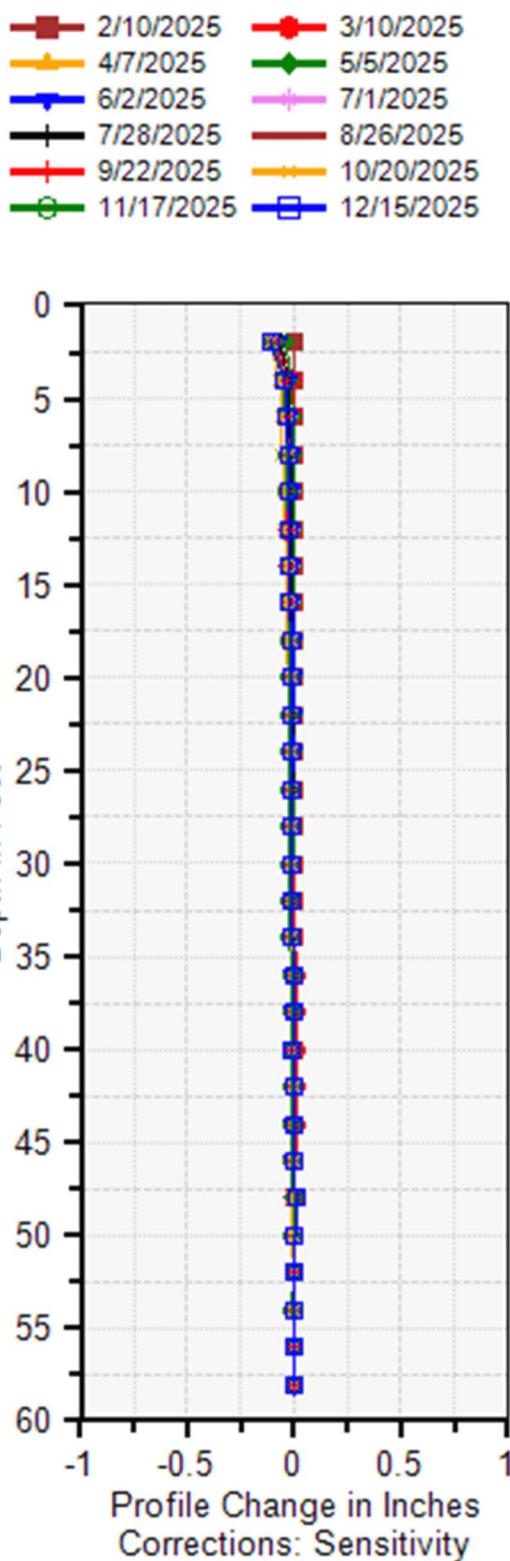
■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



SD-12-13INC A



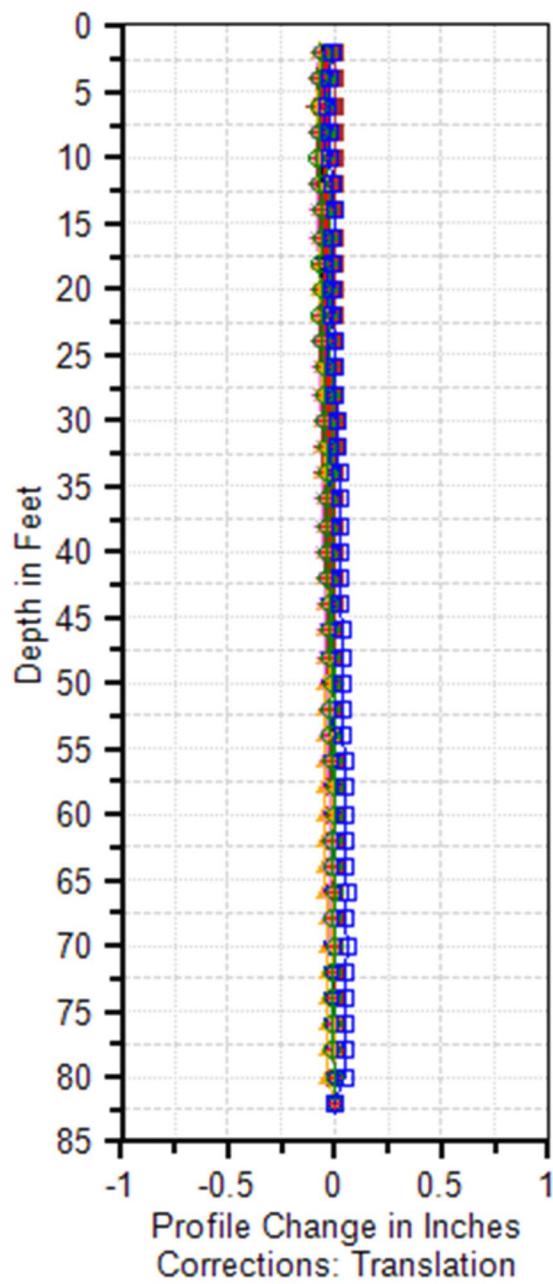
SD-12-13INC B



Sensitivity Correction - April survey

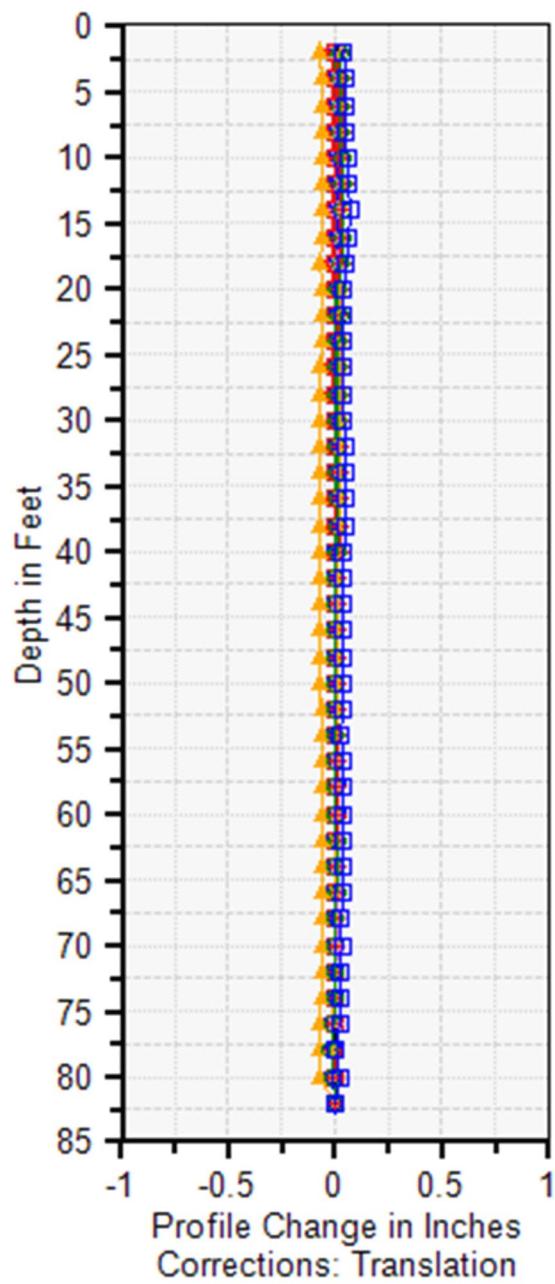
SD-12-14INC A

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



SD-12-14INC B

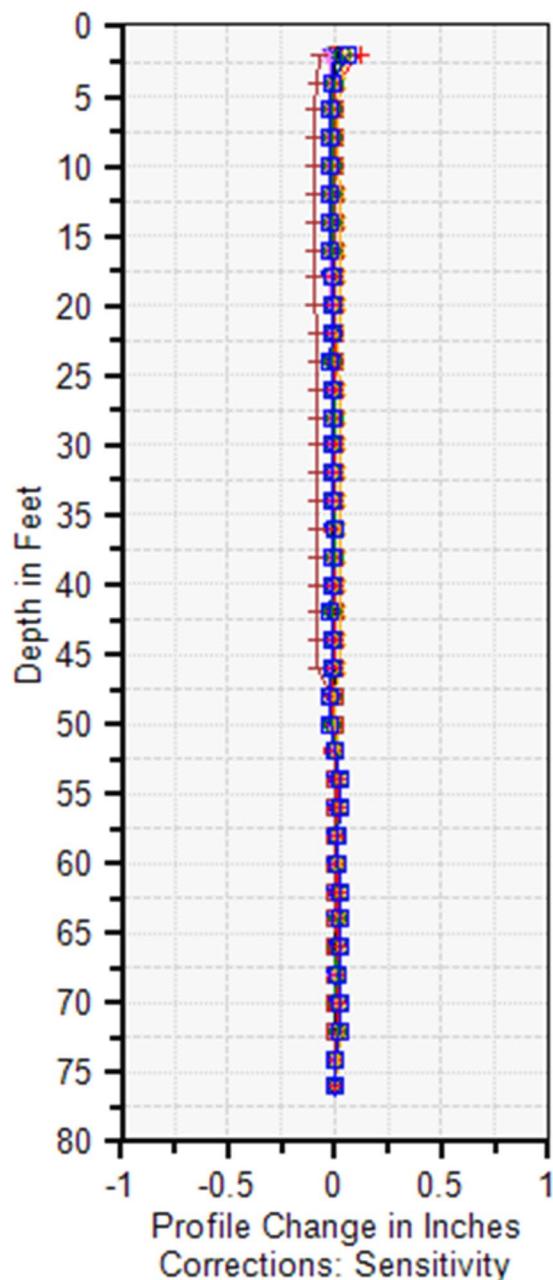
■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



Translation Correction - October & December survey

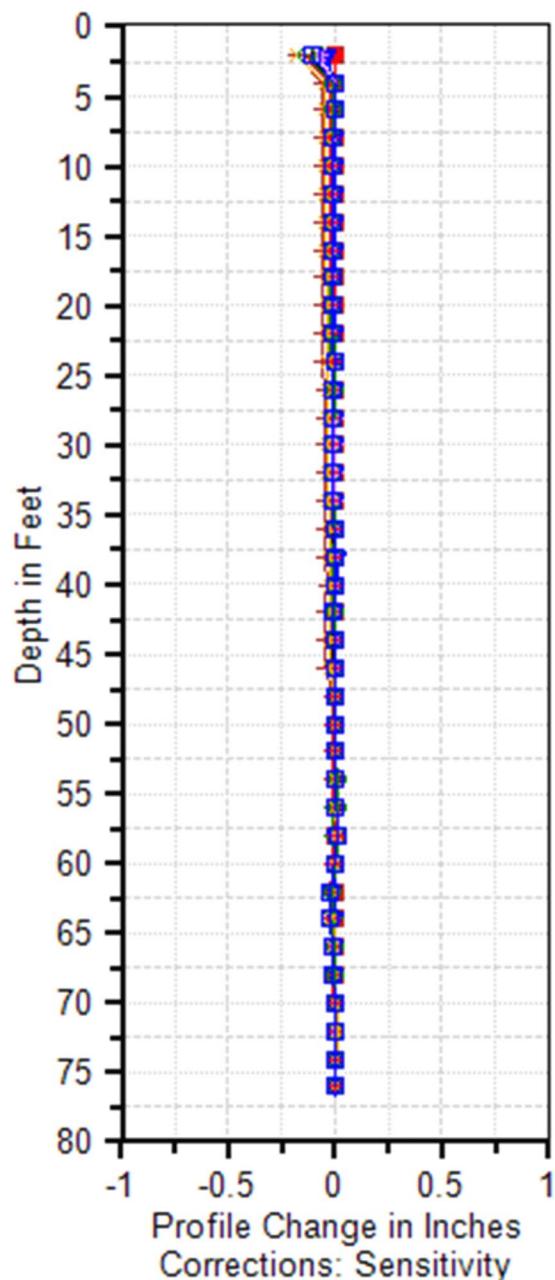
SD-12-15INC A

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	▲ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



SD-12-15INC B

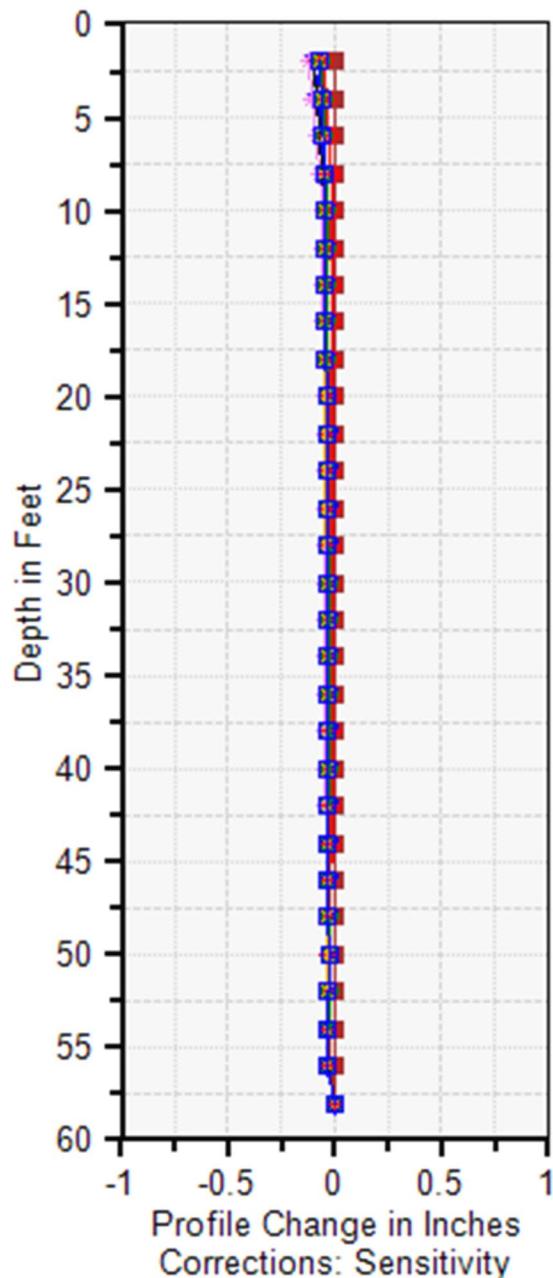
■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	▲ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



Sensitivity Correction - April survey

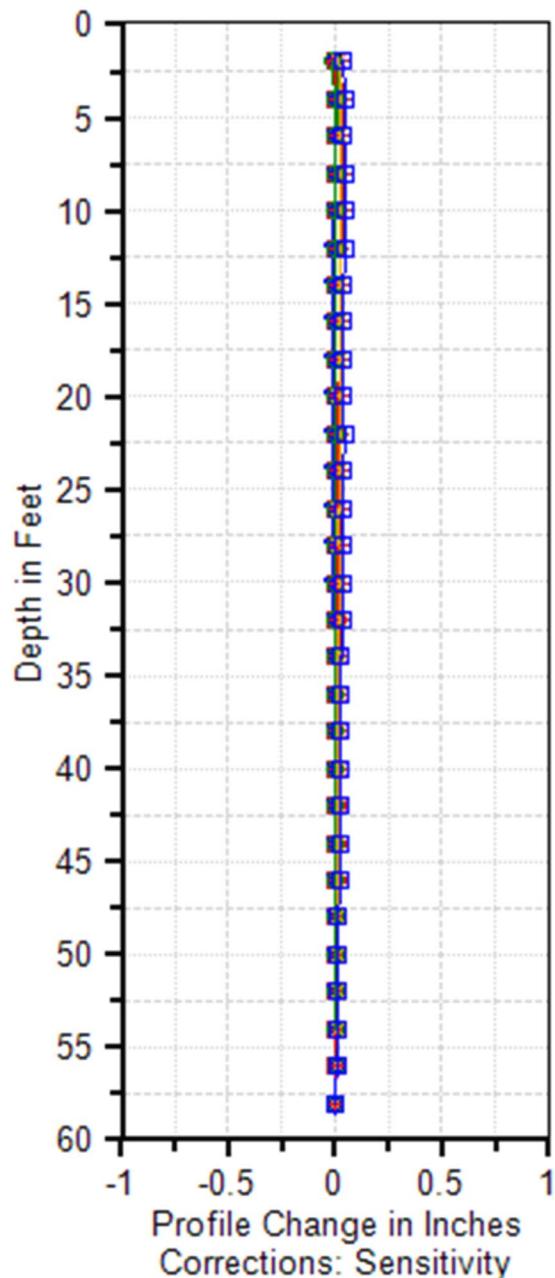
SD-12-16INC A

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



SD-12-16INC B

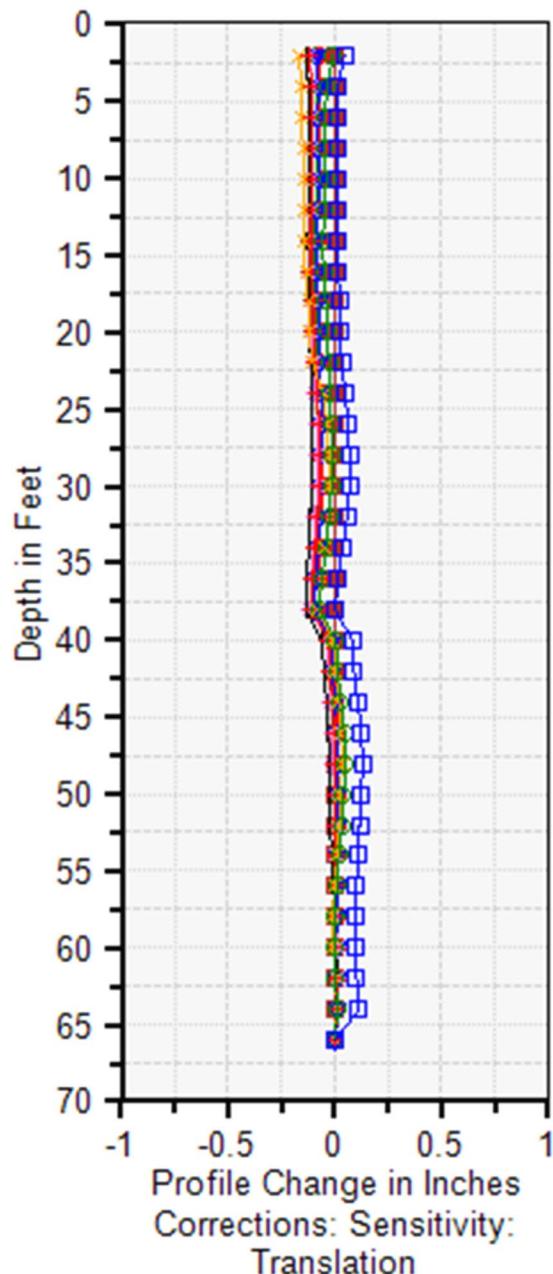
■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



Sensitivity Correction - April survey

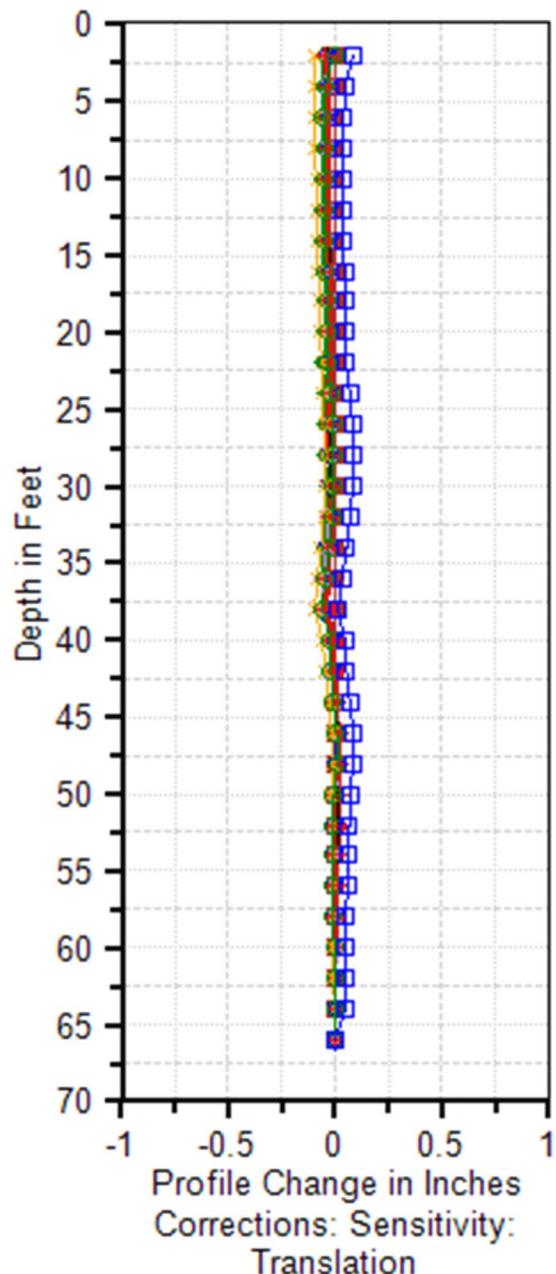
SD-15-17INC A

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
● 11/17/2025	■ 12/15/2025



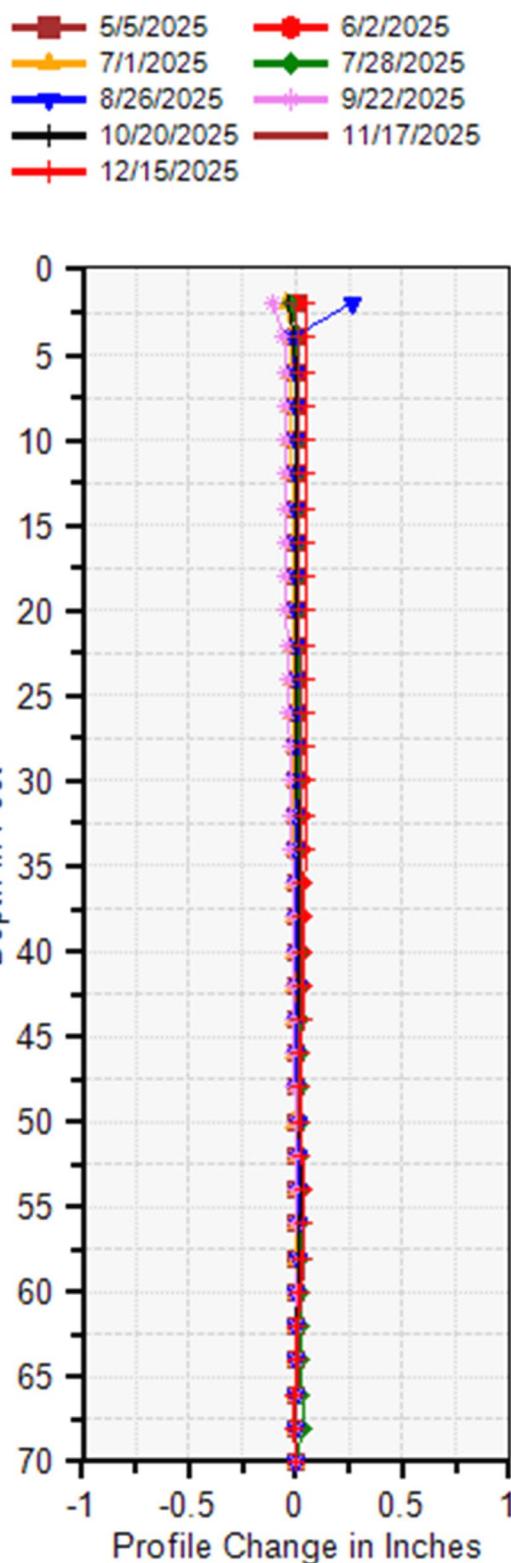
SD-15-17INC B

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
● 11/17/2025	■ 12/15/2025

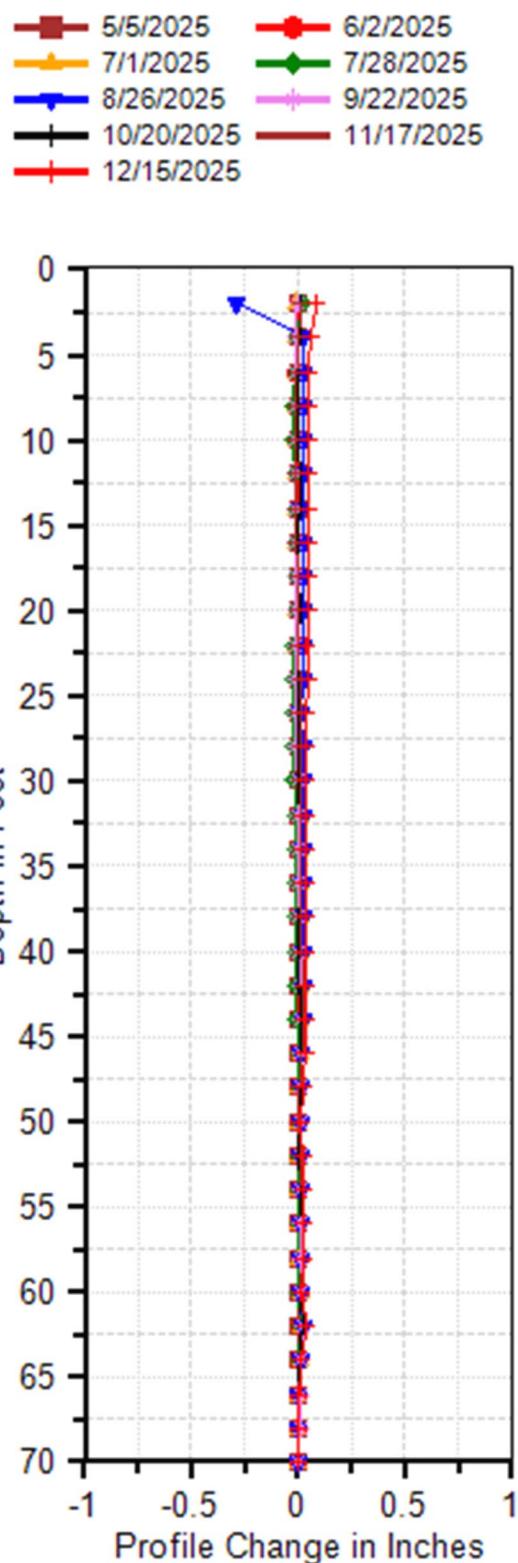


Sensitivity Correction - April survey | Translation Correction - December survey

SD-15-19INC A

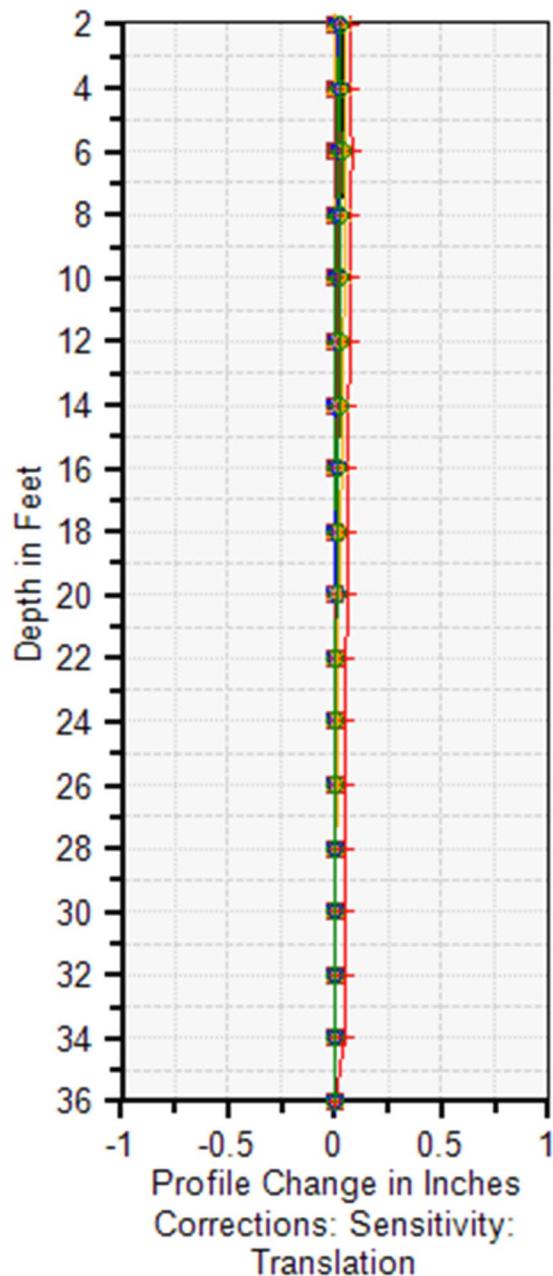


SD-15-19INC B



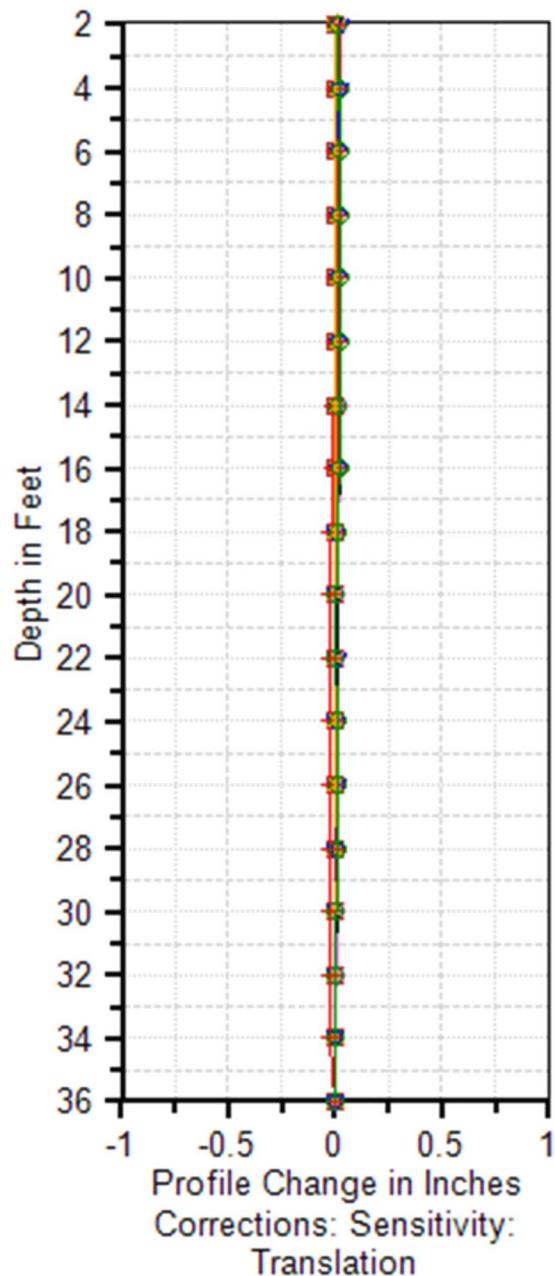
EHP H-15-19INC A

■ 3/10/2025 ■ 4/7/2025
▲ 5/5/2025 ■ 6/2/2025
■ 7/1/2025 ■ 7/28/2025
+ 8/26/2025 ■ 9/22/2025
+ 10/20/2025 ■ 11/17/2025
○ 12/15/2025



EHP H-15-19INC B

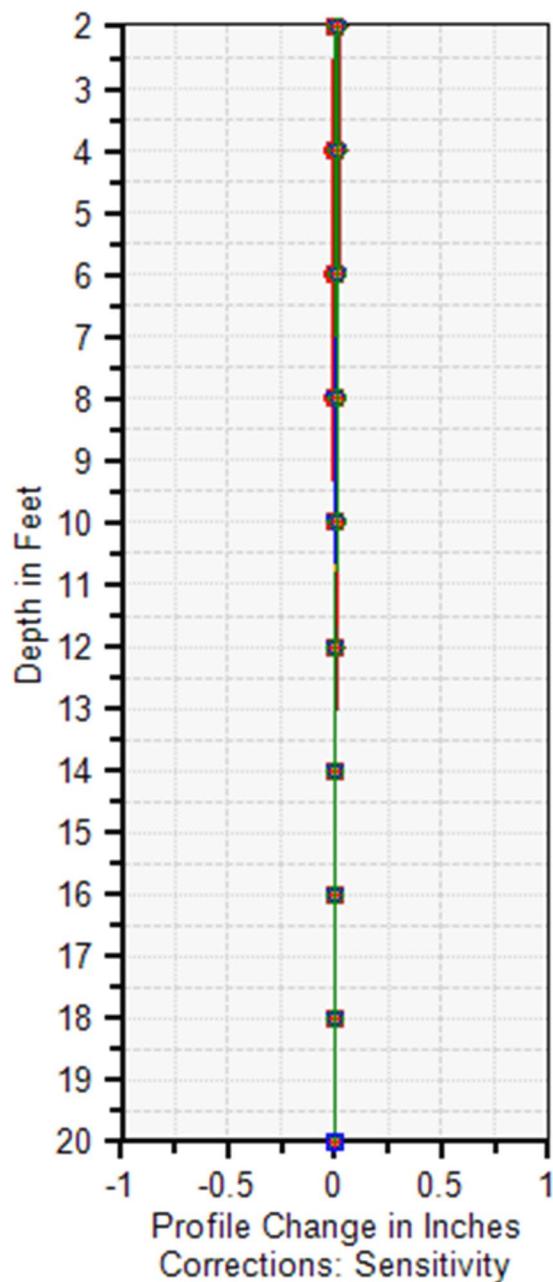
■ 3/10/2025 ■ 4/7/2025
▲ 5/5/2025 ■ 6/2/2025
■ 7/1/2025 ■ 7/28/2025
+ 8/26/2025 ■ 9/22/2025
+ 10/20/2025 ■ 11/17/2025
○ 12/15/2025



Issue with baseline survey in February, March used as baseline | Sensitivity Correction - April survey | Translation Correction - October survey

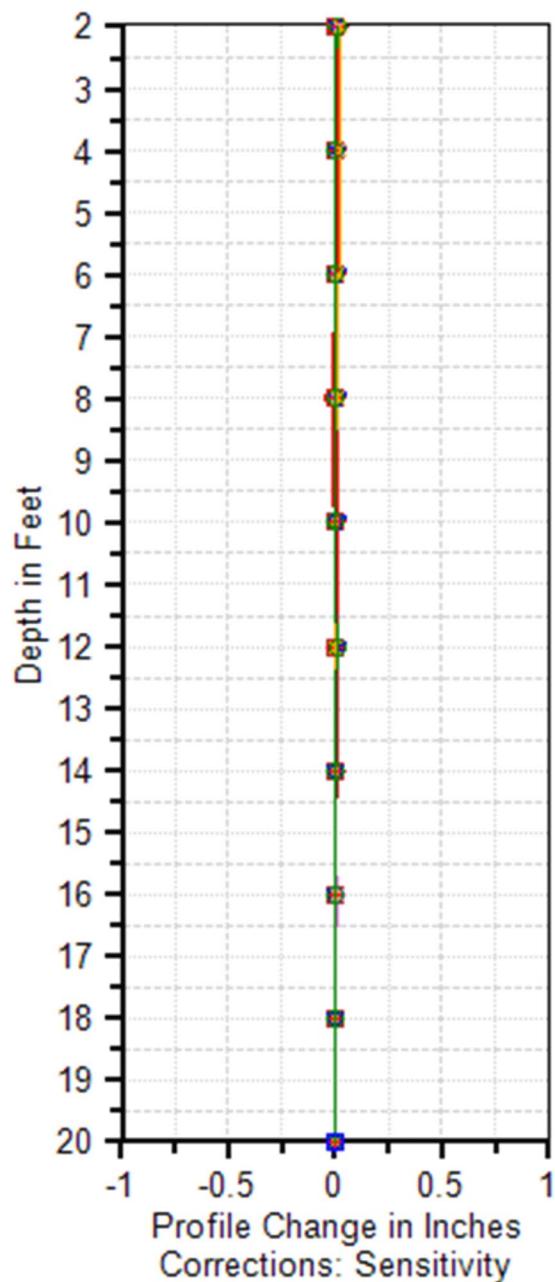
EHP F-15-20INC A

■ 2/10/2025 ■ 3/10/2025
▲ 4/7/2025 ■ 5/5/2025
■ 6/2/2025 ■ 7/1/2025
+ 7/28/2025 ■ 8/26/2025
+ 9/22/2025 ■ 10/20/2025
○ 11/17/2025 ■ 12/15/2025



EHP F-15-20INC B

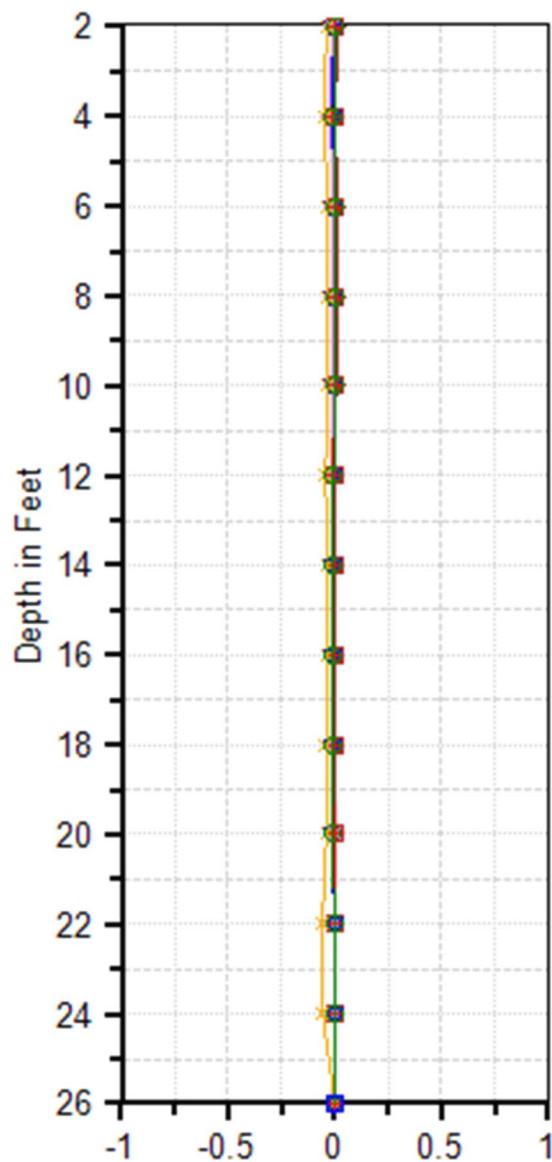
■ 2/10/2025 ■ 3/10/2025
▲ 4/7/2025 ■ 5/5/2025
■ 6/2/2025 ■ 7/1/2025
+ 7/28/2025 ■ 8/26/2025
+ 9/22/2025 ■ 10/20/2025
○ 11/17/2025 ■ 12/15/2025



Sensitivity Correction - April survey

EHP F-15-21INC A

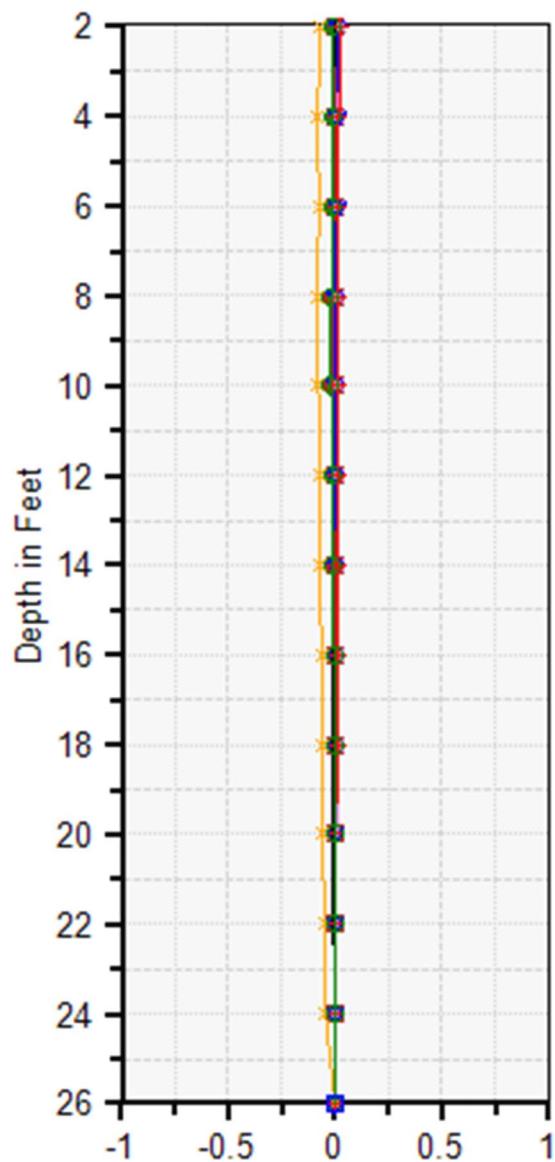
■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



Corrections: Sensitivity:
Translation

EHP F-15-21INC B

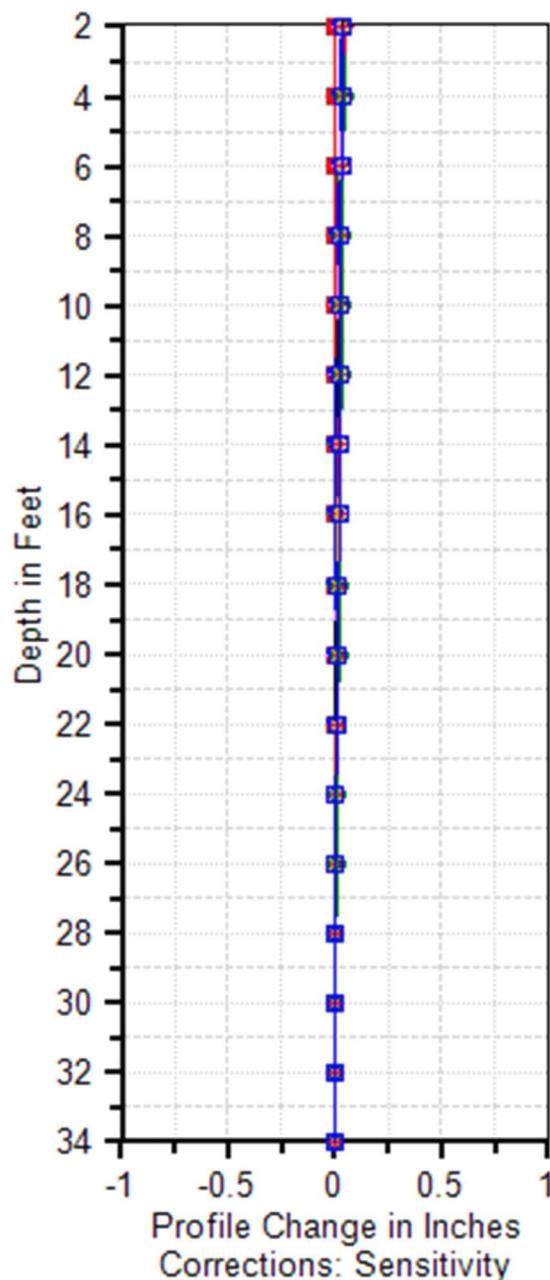
■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	◆ 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



Corrections: Sensitivity:
Translation

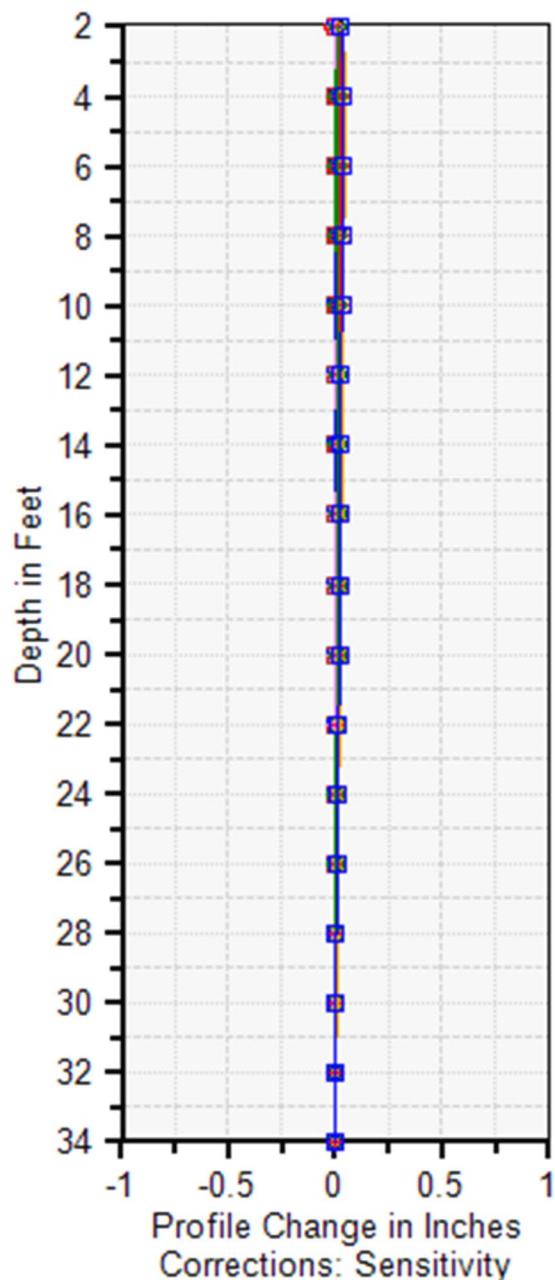
EHP H-15-22INC A

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



EHP H-15-22INC B

■ 2/10/2025	● 3/10/2025
▲ 4/7/2025	◆ 5/5/2025
■ 6/2/2025	● 7/1/2025
■ 7/28/2025	■ 8/26/2025
■ 9/22/2025	■ 10/20/2025
■ 11/17/2025	■ 12/15/2025



Sensitivity Correction - April survey



Inclinometer Correction Definitions

Bias Shift: Correct for sensor offset

Orientation: Correct for casing orientation

Rotation: Correct for sensor rotation

Sensitivity: Correct for sensor sensitivity

Spiral: Correct for casing spiral

Translation: Apply Surveyed movement to top of casing

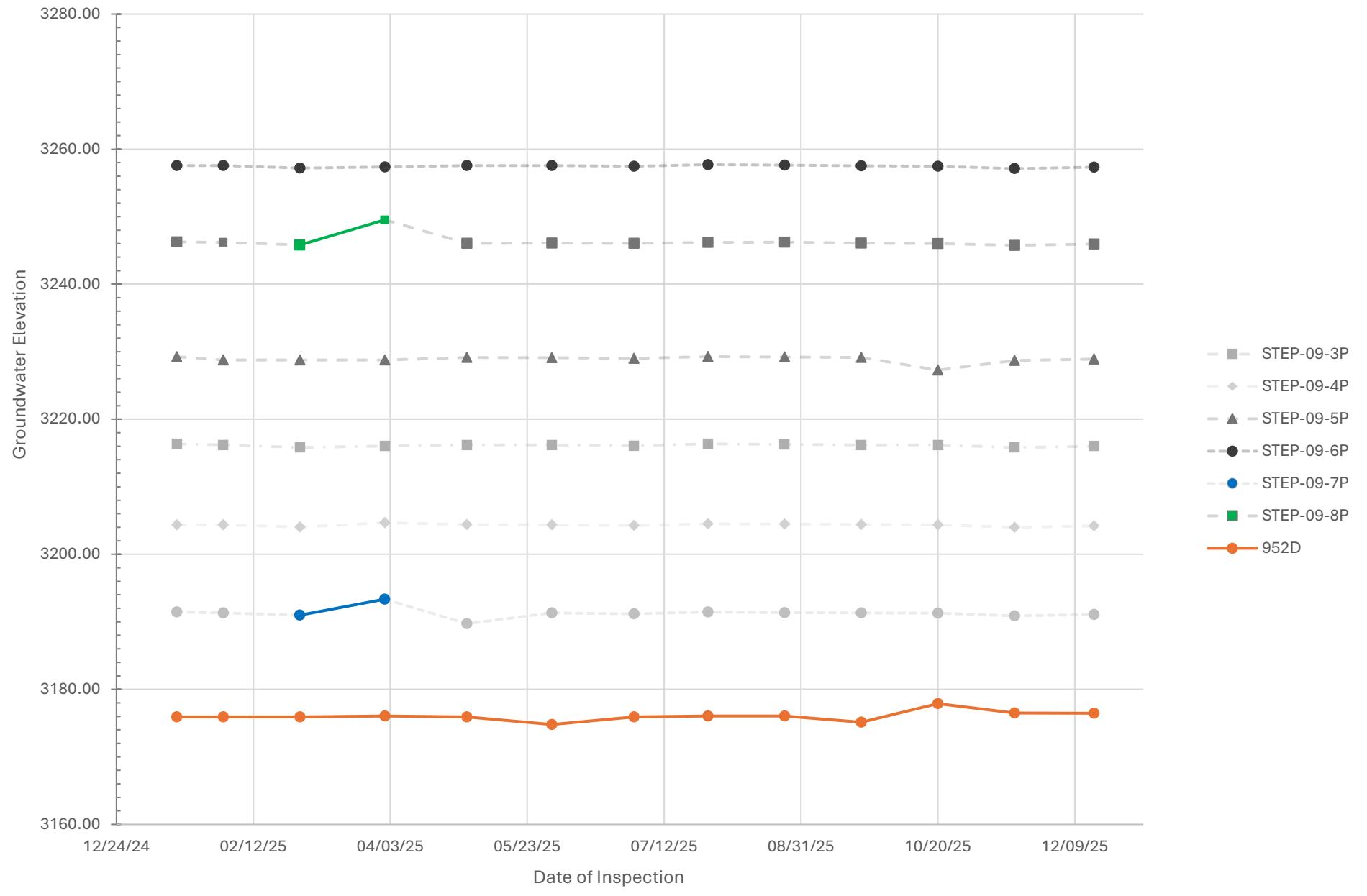
Appendix B – Piezometer Data



APPENDIX B

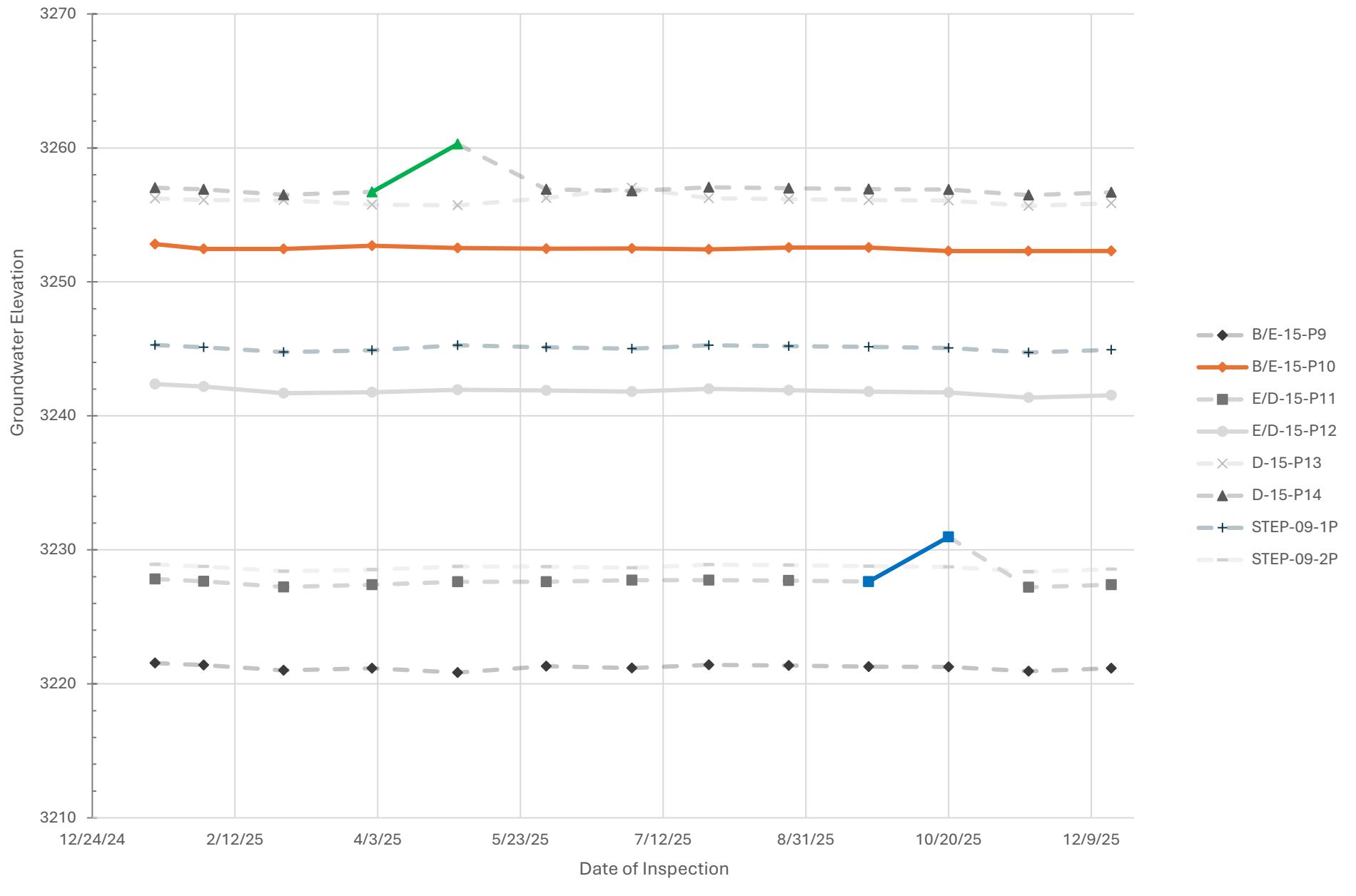
Units 1 & 2 STEP Piezometer Monitoring Plots

UNITS 1 & 2 STEP Main Dam Piezometers



Greyed lines indicate intervals of no measurable water (dry). Colored lines indicate intervals with measurable water.

UNITS 1 & 2 STEP Additional Piezometers

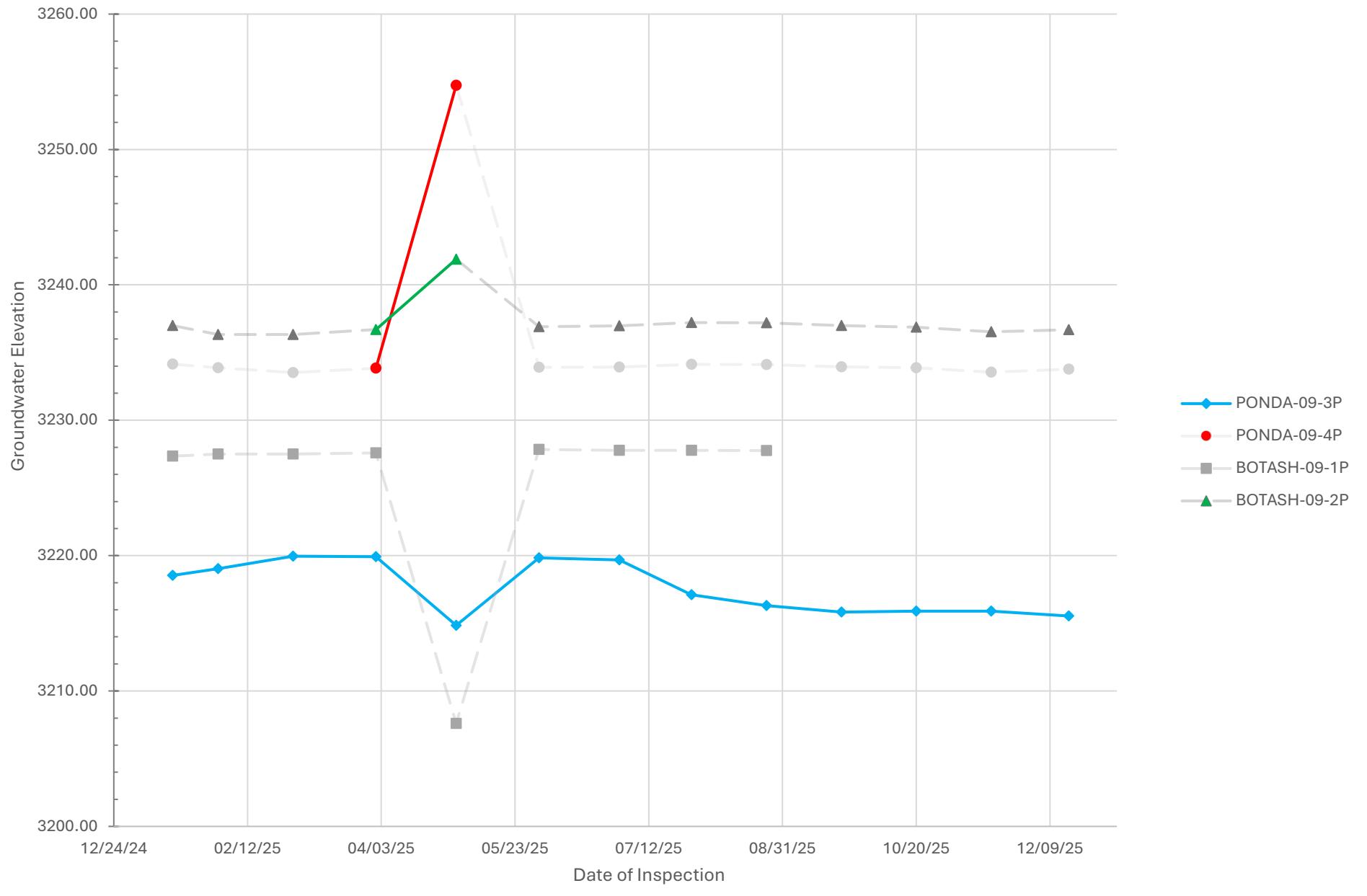


Greyed lines indicate intervals of no measurable water (dry). Colored lines indicate intervals with measurable water.



Units 1 & 2 Bottom Ash Pond Piezometer Monitoring Plots

Units 1&2 Bottom Ash Pond

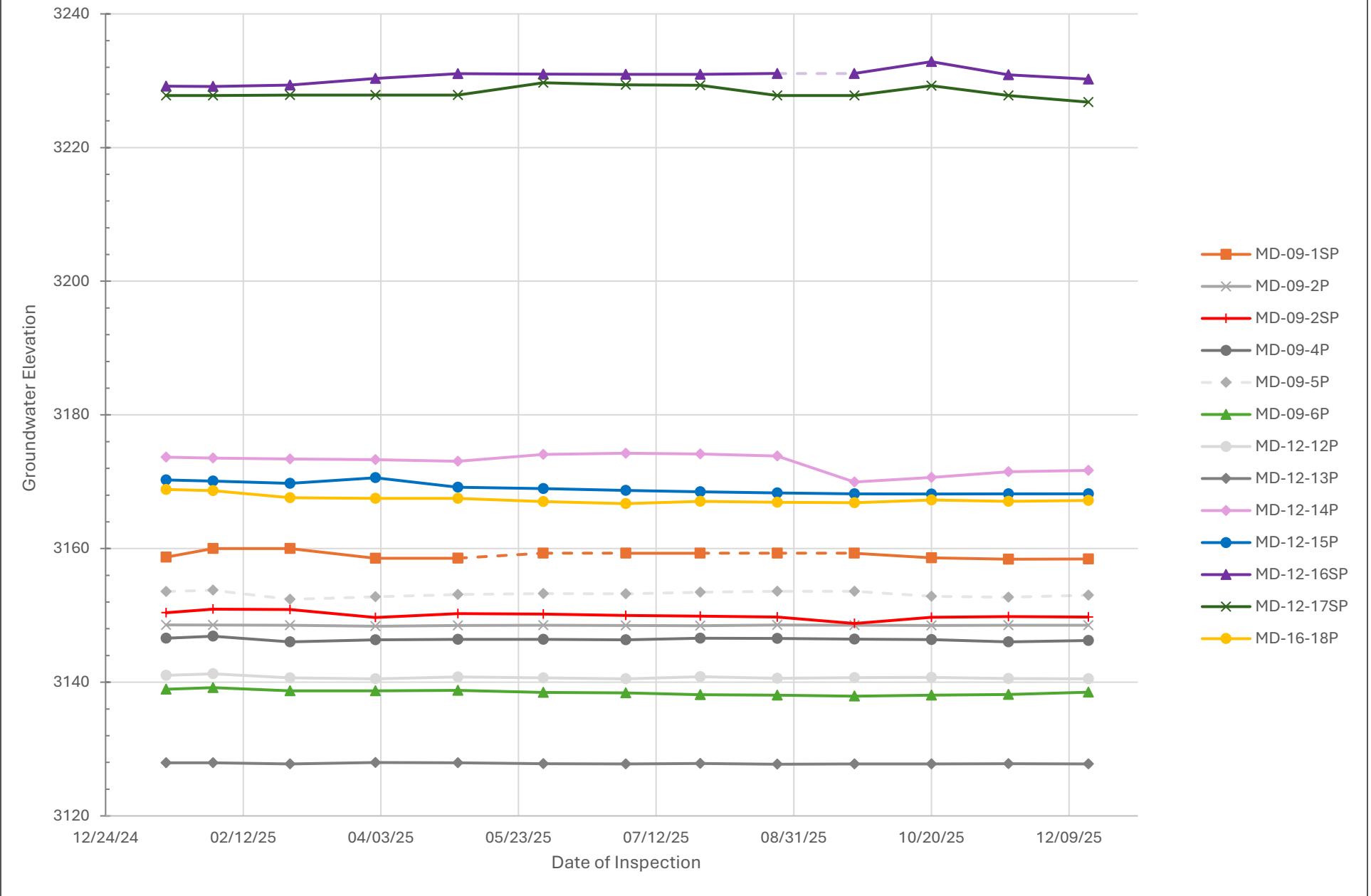


Greyed lines indicate intervals of no measurable water (dry). Colored lines indicate intervals with measurable water.



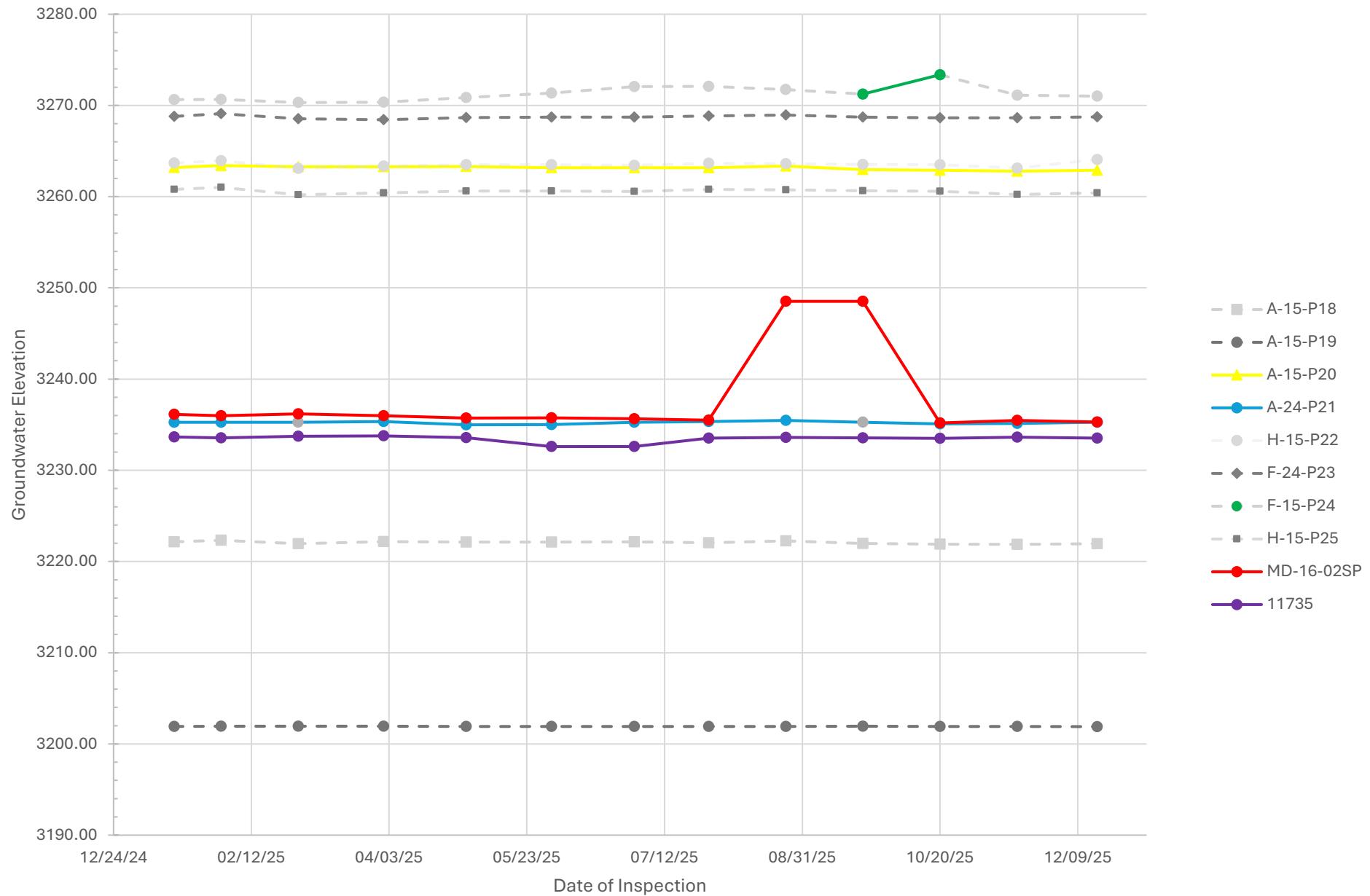
Units 3 & 4 EHP Piezometer Monitoring Plots

Units 3&4 EHP Main Dam

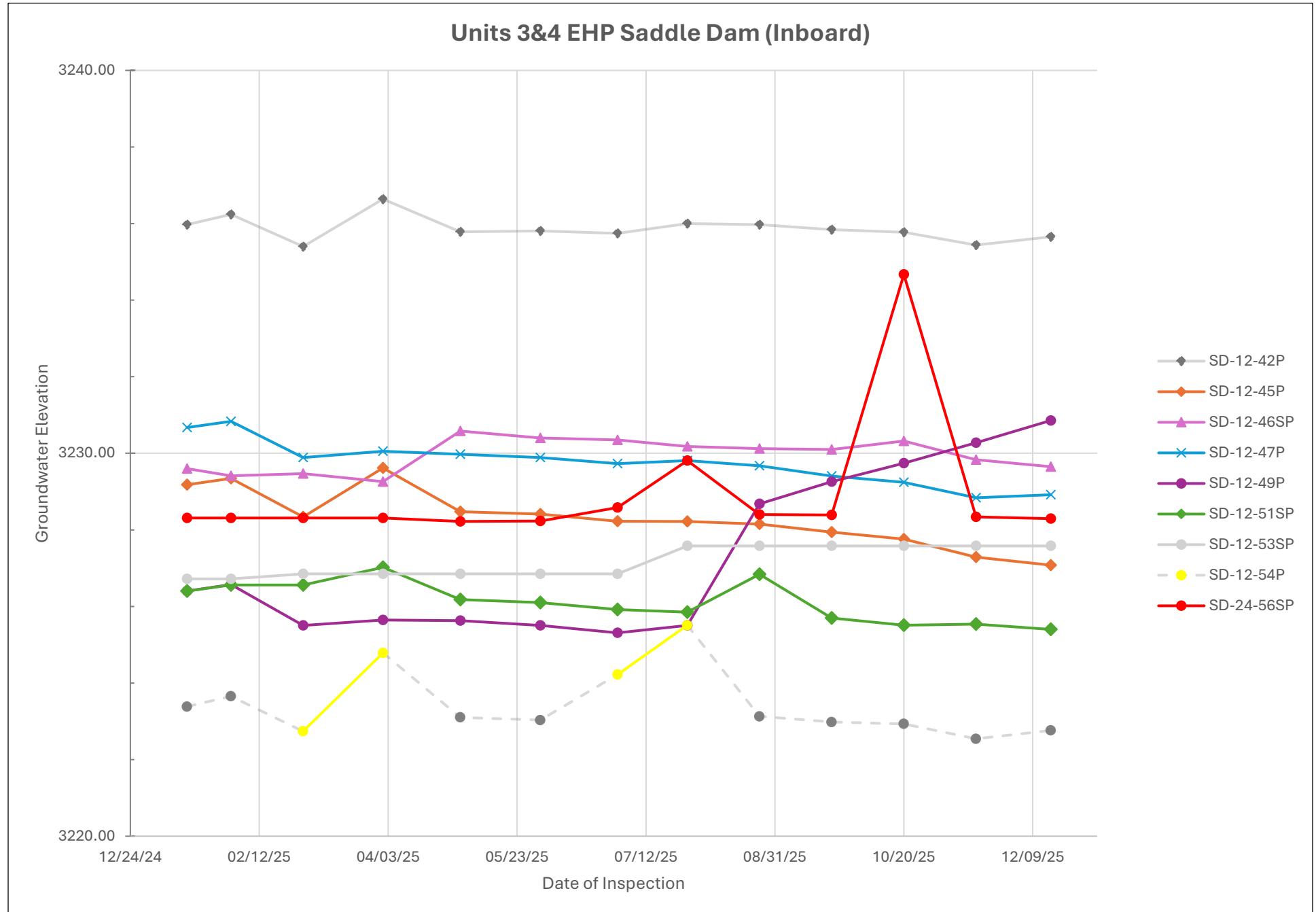


Greyed lines indicate intervals of no measurable water (dry). Colored lines indicate intervals with measurable water.

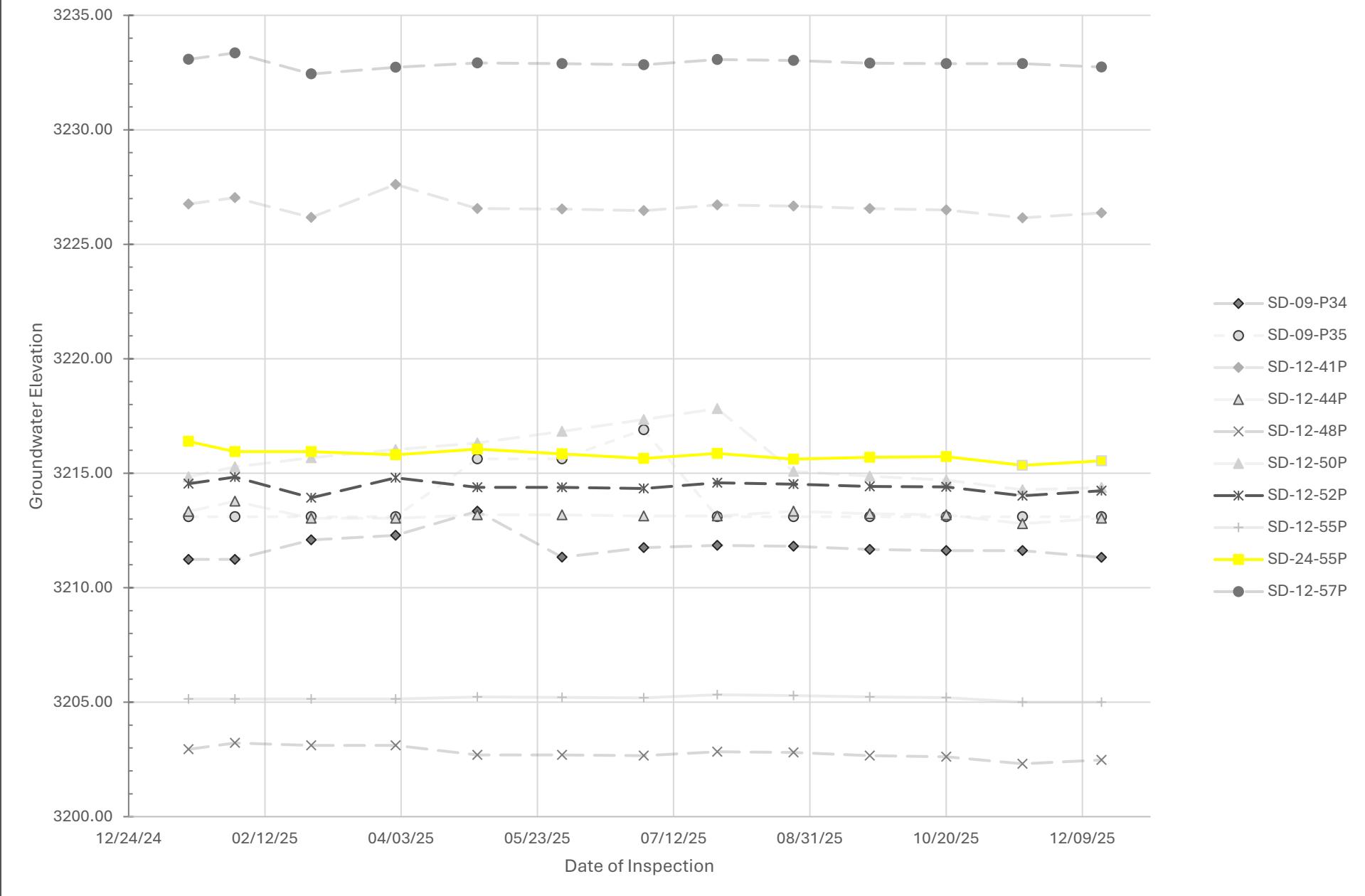
Units 3&4 EHP Additional Piezometers



Units 3&4 EHP Saddle Dam (Inboard)



Units 3&4 EHP Saddle Dam (Outboard)



Greyed lines indicate intervals of no measurable water (dry). Colored lines indicate intervals with measurable water.