

January 4, 2023

Xcel Energy, Inc.
Sherburne County Generating Station
13999 Industrial Blvd.
Becker, MN 55308

Re: 2022 Annual Inspection of Unit 3 Landfill

The Unit 3 Landfill (landfill) inspection was conducted on November 11, 2022, by Daniel J. Riggs, a professional engineer licensed in the State of Minnesota. This was the eighth inspection done in accordance with the EPA's published Coal Combustion Residual (CCR) Rules under section 257.84. Inspections prior to 2015 were conducted by the Minnesota Pollution Control Agency (MPCA).

The following items were evaluated as a part of the Section 257.84 Inspection:

i) Any changes in geometry of the structure since the previous annual inspection

Annual topographic surveys have been conducted on the landfill since initial construction. During that time, no changes in landfill geometry or embankment alignment have been observed.

ii) The approximate volume of CCR contained in the unit at the time of the inspection

There was approximately 7.8 million cubic yards (4,835 acre-feet) of CCR in the landfill at the time of 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

The landfill was inspected for structural weakness by walking a traverse at the base and top of the embankment. There were no signs that structural weakness had previously or is presently occurring on the landfill.

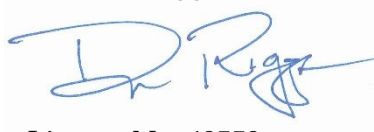
The active area sump panel controls and riser access panels were opened to verify that the leachate management system is functioning properly. There are no conditions disrupting the operation or safety of the CCR unit.

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

The CCR placed in the landfill is a lime-stabilized, Type C fly-ash with pozzolanic properties. This creates a structurally stable fill that is not subject to settlement or shifting once placed and compacted.

I have reviewed the CCR Unit Design and Construction information and have observed no deviations from those documents.

Sincerely,
Daniel J. Riggs, PE

A handwritten signature in blue ink, appearing to read "D. Riggs", with a stylized flourish extending to the right.

License No. 49559
Senior Engineer
Carlson McCain, Inc.

Unit 3 Landfill Annual Inspection - 2022



Photo 1	Exterior of north embankment, looking east.
11/11/2022	



Photo 2	Completed partial final cover project, looking east
11/11/2022	

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Photo 3	Final cover run-off control flap, looking south.
11/11/2022	



Photo 4	Interior of north embankment, looking east.
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Photo 5	Interior of west embankment, looking south.
11/11/2022	



Photo 6	South embankment of active area, looking east.
11/11/2022	

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Photo 7	Landfill overview with horizontal expansion project, looking northwest (note that expansion was not yet active at the time of this report).
11/11/2022	



Photo 8	Run-off control berm installed on all final cover terminations, looking west.
11/11/2022	