

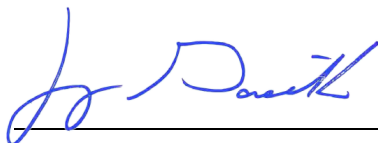
Memorandum

To: Rick Rosvold, Director Environmental Services
From: Jeremy Gacnik
Subject: Northern States Power Company, Black Dog Generating Plant, Ash Pond Closure Certification
Date: July 15, 2019
Project: 23191085

Northern States Power Company, a Minnesota corporation doing business as Xcel Energy (NSPM), undertook construction activities in 2016 to remove coal combustion residuals (CCR) from three coal combustion residuals (CCR) units, referred to as Ash Ponds 1, 2 and 3 (collectively the Ash Ponds) at its Black Dog Generating Plant (Plant or Site), located in Burnsville, MN. Closure by removal construction activities were documented in Closure Certification Report, Ash Ponds 1-3, prepared by Barr Engineering Co. (Barr) in February 2017. Closure construction for the Ash Ponds was conducted in accordance with the Ash Pond Closure Plan, prepared by Barr in May 2016.

Groundwater samples were collected and analyzed after completion of closure construction activities. Statistical analysis of groundwater sampling results completed on May 14, 2019, demonstrate that groundwater concentrations do not exceed the groundwater protection standard established pursuant to § 257.95(h) for constituents listed in Appendix IV to 40 CFR Part 257, Disposal of Coal Combustion Residuals from Electric Utilities. Therefore, it is determined that the Ash Ponds have been closed in accordance with the requirements of 40 CFR § 257.102, closure by removal of CCR procedures established in paragraph (c).

I hereby certify that the closure of the Ash Ponds at Northern States Power Company's Black Dog Generating Plant has been completed in accordance with the closure plan specified in paragraph 40 CFR § 257.102(b) and the requirements of 40 CFR § 257.102. This memo was prepared by me or under my direct supervision and I am a duly licensed professional engineer under the laws of the State of Minnesota.

A handwritten signature in blue ink, appearing to read "Jeremy Gacnik".

Jeremy Gacnik
PE #: 49292

July 31, 2019

Date