



January 4, 2020

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

**Re: 2019 Annual Inspection of Unit 3 Landfill**

The Unit 3 Landfill (landfill) inspection was conducted on October 24<sup>th</sup>, 2019 by Daniel J. Riggs, a professional engineer licensed in the State of Minnesota. This was the fifth 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 7.5 Million Cubic Yards 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 'DR', with a stylized flourish extending from the end.

License No. 49559  
Senior Engineer  
Carlson McCain, Inc.





FIGURE 1  
UNIT 3 LANDFILL 2019  
ANNUAL INSPECTION  
PHOTO LOCATIONS



## Unit 3 Landfill Annual Inspection - 2019



Photo 1	Left: construction of new final cover. Right: existing final cover
10/24/2019	(constructed in 2017), looking north.



Photo 2	Run-on/run-off control berm, looking east.
10/24/2019	



## Unit 3 Landfill Annual Inspection - 2019



Photo 3	Left: active area of landfill. Center: final cover construction project, looking south.
10/24/2019	



Photo 4	Interior of north berm, looking east.
10/24/2019	



## Unit 3 Landfill Annual Inspection - 2019



Photo 5	Exterior of north berm, looking east.
10/24/2019	



Photo 6	Exterior of north berm, looking west.
10/24/2019	



### Unit 3 Landfill Annual Inspection - 2019



Photo 7	Run-on/run-off containment berm along east side of landfill, looking west.
10/24/2019	



Photo 8	Foreground/right: final cover construction. Background/left: active area of landfill, looking west.
10/24/2019	

### Unit 3 Landfill Annual Inspection - 2019

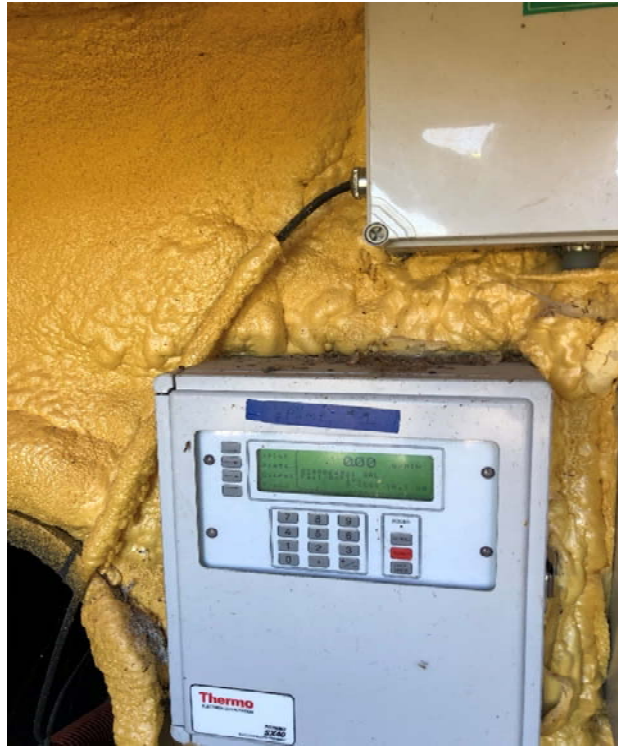


Photo 9	Display screen on properly functioning Pump No. 1.
10/24/2019	



Photo 10	Display screen on properly functioning Pump No. 2.
10/24/2019	