



January 6, 2016

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

Re: Initial Annual Inspection of Unit 3 Landfill

The Unit 3 Landfill (landfill) inspection was conducted on October 19th, 2015 by Daniel J. Riggs, a professional engineer licensed in the State of Minnesota. This was the first inspection done in accordance with the EPA's published Coal Combustion Residual (CCR) Rules under section 257.83. Prior inspections have been conducted by the Minnesota Pollution Control Agency (MPCA).

The following items were evaluated as a part of the Section 257.83 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 6.7 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, Construction information and weekly/monthly inspections performed by qualified personnel and concur with their conclusions.

Sincerely,
Daniel J. Riggs, PE

A handwritten signature in black ink, appearing to read "Dan Riggs", with a stylized flourish at the end.

License No. 49559
Senior Engineer
Carlson McCain, Inc.



FIGURE 1
UNIT 3 LANDFILL ANNUAL INSPECTION
PHOTO LOCATIONS

Unit 3 Landfill Annual Inspection – October 2015



Photo 1	Exterior of North embankment, looking east
10/19/2015	



Photo 2	North embankment, looking west
10/19/2015	

Unit 3 Landfill Annual Inspection – October 2015



Photo 3	Interior of North embankment, looking west
10/19/2015	



Photo 4	Interior of West embankment, looking south
10/19/2015	

Unit 3 Landfill Annual Inspection – October 2015



Photo 5	Left: Active area of the landfill. Right: Newly constructed final cover. Middle:
7/2/2015	Final cover geomembrane is flipped back to create a CCR contact-water diversion berm, looking west (Photo taken prior to inspection).



Photo 6	CCR contact-water diversion berm, looking east.
10/19/2015	

Unit 3 Landfill Annual Inspection – October 2015



Photo 7	Initial vegetation on newly constructed final cover area, looking east.
10/19/2015	



Photo 8	Overview of active area, looking west
10/19/2015	

Unit 3 Landfill Annual Inspection – October 2015



Photo 9	Left: Cell 2C Pump Controls. Right: Cell 2C Riser Pipe Access Panel
10/19/2015	

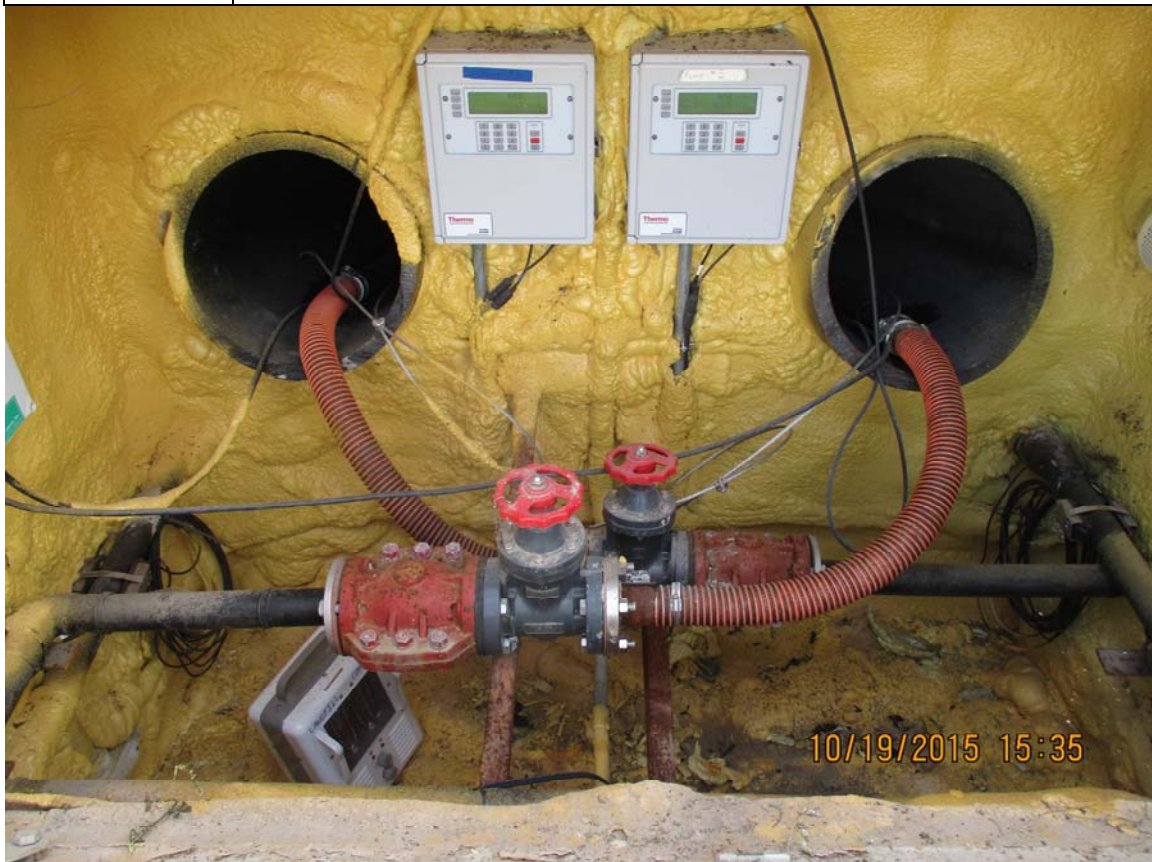


Photo 10	Inside of Cell 2C access panel.
10/19/2015	

Unit 3 Landfill Annual Inspection – October 2015



Photo 11	Display screen on properly function Pump No. 1 (left pump on photo 10)
10/19/2015	

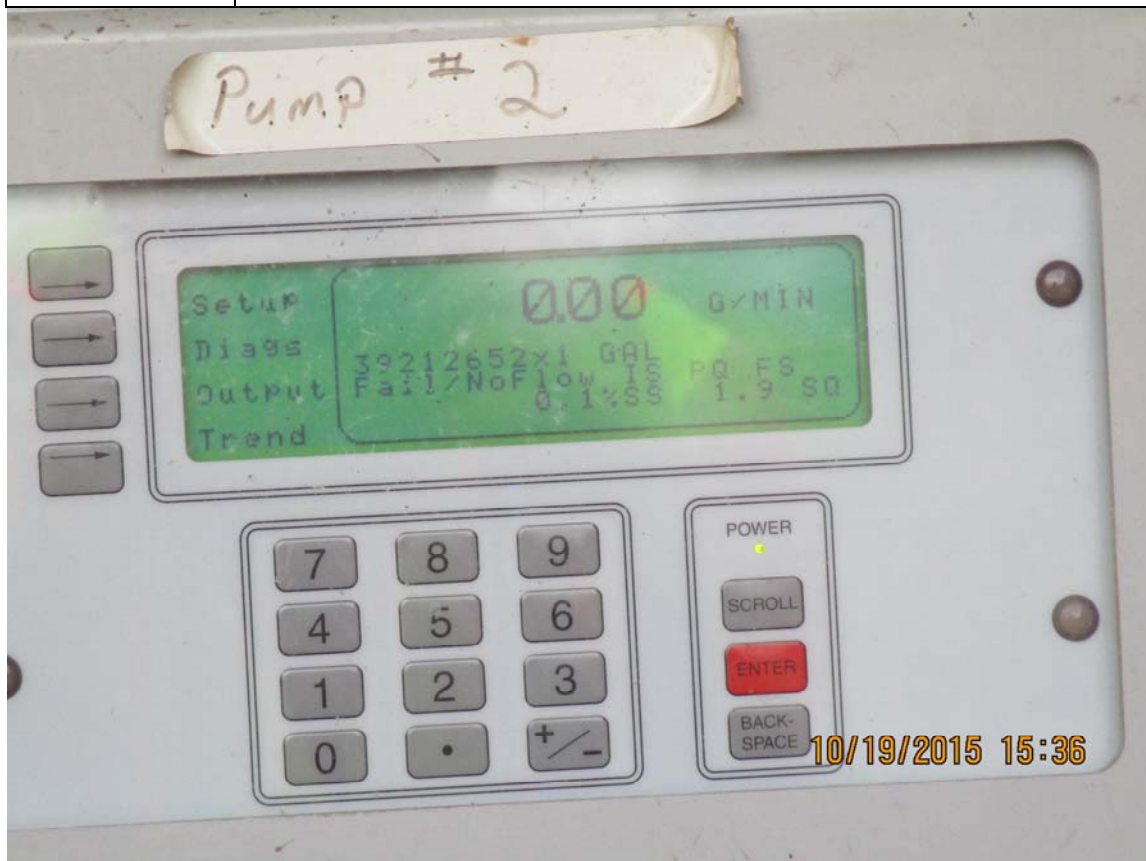


Photo 12	Display screen on properly function Pump No. 2 (right pump on photo 10)
10/19/2015	