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:

1. **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.

2. **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.

3. **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.

4. **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

[Signature]

License No. 49559
Senior Engineer
Carlson McCain, Inc.
Photo 1
10/19/2015
Exterior of North embankment, looking east

Photo 2
10/19/2015
North embankment, looking west
Photo 5

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>7/2/2015</td>
<td>Left: Active area of the landfill. Right: Newly constructed final cover. Middle: Final cover geomembrane is flipped back to create a CCR contact-water diversion berm, looking west (Photo taken prior to inspection).</td>
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Photo 6

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
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<tbody>
<tr>
<td>10/19/2015</td>
<td>CCR contact-water diversion berm, looking east.</td>
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Photo 7  
10/19/2015  
Initial vegetation on newly constructed final cover area, looking east.

Photo 8  
10/19/2015  
Overview of active area, looking west
Photo 9  
10/19/2015  
Left: Cell 2C Pump Controls. Right: Cell 2C Riser Pipe Access Panel

Photo 10  
10/19/2015  
Inside of Cell 2C access panel.
<table>
<thead>
<tr>
<th>Photo 11</th>
<th>10/19/2015</th>
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<tbody>
<tr>
<td>Display screen on properly function Pump No. 1 (left pump on photo 10)</td>
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<table>
<thead>
<tr>
<th>Photo 12</th>
<th>10/19/2015</th>
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<tbody>
<tr>
<td>Display screen on properly function Pump No. 2 (right pump on photo 10)</td>
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