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BY EMAIL: kevin.ambrose@state.co.us

Kevin Ambrose  
Environmental Protection Specialist II  
Solid Waste Permitting Unit—Hazardous Materials and Waste Management Division  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, CO 80246

RE: Semi-annual update bottom ash transfer ponds (BAT) in accordance with CCR Rule 40 CFR 257.97(a)

Dear Mr. Ambrose,

In accordance with the Coal Combustion Residuals (CCR) Rule, 40 CFR 257 Subpart D, the Rawhide Energy Station has worked with AECOM on groundwater monitoring activities. As discussed in previous correspondence, Platte River Power Authority (Platte River) worked with AECOM to initiate an assessment of corrective measures for Cobalt at the bottom ash transfer (BAT) impoundments. This assessment of corrective measures (ACM) was prepared in accordance with 40 Code of Federal Regulations (CFR) Parts 257.96 and 257.97 requirements under the CCR Rule. In addition, U.S. Environmental Protection Agency (EPA) guidance documents (EPA 1993; EPA 2000) were used in the assessment of corrective measures.

Following the completion of the assessment of corrective measures, Platte River held an open house at the Rawhide Energy Station on Nov. 13, 2019. This open house was promoted in advance through local media advertisements. Platte River also sent open house invitations to 47 of the facility's neighboring property owners. Since the open house, Platte River allowed 30 days for public comment on the assessment of corrective measures. Platte River removed the BAT impoundments in summer and fall of 2020 and the Colorado Department of Public Health and Environment (CDPHE) approved this construction completion certification report on Oct. 6, 2021.

Platte River has been working with AECOM to continue groundwater sampling and analysis on a semi-annual basis to evaluate groundwater conditions at the BAT impoundments. We will use the results to determine an appropriate remedy for Cobalt at the BAT impoundments. We are submitting this semi-annual update that describes the progress in selecting and designing the remedy to also meet the requirements of CFR 257.97(a). In addition, eight quarterly groundwater sampling events have been implemented to comply with the State of Colorado post BAT impoundment closure monitoring requirements. Quarterly sampling is continuing post closure for monitoring wells in the BAT impoundment network. Platte River installed a second monitoring well (BAT-13) in July 2023 near BAT-05 and collected groundwater samples in attempt to confirm sampling results collected from BAT-05 to

date. After three consecutive sampling events, monitoring well BAT-13 has been determined to be an unsuitable replacement for monitoring well BAT-05 due to consistent and anomalously low groundwater yield that inhibits the ability to collect a complete sample set using low flow methods and appearing to not be hydraulically connected to surrounding wells based on groundwater elevation data. As a result, BAT-13 is planned to be abandoned during the 2025 monitoring year.

In June 2025, Platte River installed two additional monitoring wells (BAT-15 and BAT-16), with the intent to increase understanding of the hydrogeological nature near the former BAT impoundments between the BAT-05 area and Hamilton Reservoir. This will help refine our understanding of complex groundwater flow conditions on the south and southwest sides of the BAT impoundments and facilitate an appropriate remedy selection. We will continue communicating the progress regarding selection and implementation of the remedy. We are also continuing to monitor the groundwater in accordance with the CDPHE Waste Division program.

Please contact us with any questions you may have.

Thank you,

Chaz Myers  
Environmental Engineer  
Platte River Power Authority

Lea Schneider, Environmental Health Planner at Larimer County