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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 ash monofill 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, Platte River Power Authority (Platte River) has worked with AECOM on groundwater monitoring activities at the Rawhide Energy Station. As discussed in previous correspondence with the Division, Platte River also worked with AECOM to initiate an assessment of corrective measures (ACM) for Selenium at the ash monofill. This 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 preparation of the ACM.

Following the completion of the ACM, Platte River held an open house on Nov. 13, 2019, at the Rawhide Energy Station to solicit public input. 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 ACM. Platte River has been working with AECOM to continue groundwater sampling and analysis on a semi-annual basis. We will continue evaluating groundwater results from 2025 and prior to determine an appropriate remedy. 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).

Additionally, Platte River worked with AECOM in the second half of 2022 and into 2023 to install a liner and leachate collection system to the expansion portion (Cell 2B) of the ash monofill providing partial source control at the monofill. The Cell 2B construction was completed in March of 2023. Platte River is exploring source removal with Cell 1 of the ash monofill. This would include Platte River submitting an Engineering Design and Operations Plan (EDOP) to the Division to describe appropriate ash removal methods so this ash may be put to beneficial reuse offsite.

As part of the CDPHE program, Platte River installed an additional monitoring well (ASH-09) in July 2023 and are continuing to sample this well on a semi-annual basis. In June 2025, Platte River installed two additional monitoring wells (ASH-10 and ASH-11) with the objective to refine understanding of groundwater flow in the area between the ash monofill and Hamilton Reservoir and to establish point of compliance wells

approximately 150 meters down gradient of the ash monofill. Ground water sampling from these newly installed wells was initiated in the second half of 2025.

In June 2026, at the request of Platte River, AECOM prepared an Alternative Source Demonstration (ASD) for selenium detected in downgradient wells of the ash monofill. The ASD demonstrated that selenium exceedances reflect natural background variability and geochemical processes inherent to the site setting and that the selenium SSLs reported for the ash monofill monitoring wells are attributable to naturally occurring background conditions rather than releases from CCR operational activity or other solid waste units at Rawhide Energy Station.

Continued groundwater monitoring results from the 2025 monitoring network enhancements, along with the result of the 2026 ASD, will be taken into consideration by PRPA to 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 on a semi-annual basis in accordance with the Colorado Department of Public Health and Environment (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