



Platte River

Power Authority

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Ms. Barbare:

In accordance with the Coal Combustion Residuals (CCR) Rule, 40 CFR 257 Subpart D, Rawhide Energy Station has worked with AECOM to perform an alternative source demonstration (ASD) at the onsite Bottom Ash Transfer (BAT) Impoundments. The ASD was performed to evaluate if the BAT Impoundments or other sources contributed to statistically significant levels (SSL) of cobalt at levels above the groundwater protection standard (GWPS) at downgradient well BAT-05. Cobalt is listed in the Appendix IV constituents of the CCR rule. No other Appendix IV constituent was present at concentrations higher than the GWPS.

As stipulated in 40 CFR 257.95(g) (3), the ASD was initiated after evaluating the Appendix IV statistical results on December 19, 2018. The ASD was completed within 90 days of identifying the cobalt SSL. The ASD results were placed in the Platte River operating record on March 18, 2019.

Based upon the results of the ASD, Platte River is pursuing an assessment of corrective measures (ACM). Per 40 CFR 296(a), this assessment will be initiated to prevent further releases and the ACM must be completed within 90 days. This assessment will be certified by a qualified professional engineer to remediate any releases and to restore affected areas to original conditions. Per 40 CFR 296 (b), assessment monitoring will continue at the BAT Impoundments.

Upon completion of the ACM, it will be placed in the Platte River operating record to comply with 40 CFR 257.96(d). Within 30 days, a notification of the availability of the ACM will be sent to the State of Colorado and Larimer County and placed on the publicly accessible internet site. In addition, at least 30 days prior to the selection of a remedy, a public meeting will be convened by PRPA to discuss the results of the ACM with interested and affected parties.

Please contact us with any questions you may have.

Courtney Stewart, PE