

June 2019

Platte River Power Authority  
2000 East Horsetooth Road  
Fort Collins, CO 80525

**Notification of Intent to Close – CCR Surface Impoundments  
EPA Final CCR Rule (40 CFR §257.102)  
Rawhide Energy Station  
Wellington, Colorado**

**1.0 PURPOSE**

This letter documents the notice of intent to close the Bottom Ash Transfer (BAT) Impoundments at Rawhide Energy Station in accordance with the EPA Final CCR Rule §257.102(g).

**2.0 NARRATIVE DESCRIPTION OF CLOSURE ACTIVITIES**

The BAT Impoundments will be clean closed. This will include the removal of waste material and residual contamination to meet acceptable levels in soil and groundwater. Closure activities include, but are not limited to, decommissioning utilities, excavating and disposing of CCR in the CCR Monofill onsite, verification sampling, final grading, and seeding. Closure of the BAT Impoundments is anticipated to include the following general tasks:

- Preconstruction survey of the CCR materials;
- Utility location and abandonment of existing piping;
- Excavation of CCR materials within the BAT Impoundments;
- Soil verification sampling and testing, and additional excavation (if needed);
- Subgrade preparation and minor filling within the impoundments; and
- Miscellaneous site work including temporary erosion and sedimentation controls, temporary and permanent seeding, mulching, cleanup and restoration of areas disturbed during construction.

**3.0 CLEAN CLOSURE**

The closure of the BAT Impoundments will employ removal of CCR complying with the requirements found in 40 CFR §257.102(c) as provided below.

*(c) Closure by removal of CCR. An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV to this part.*

**4.0 SCHEDULE FOR COMPLETING CLOSURE ACTIVITIES**

The following sequential steps are necessary for completing the closure activities of 40 CFR §257.102 and their estimated scheduled completion dates are provided in Table 1: Schedule of Closure Activities. The closure schedule is subject to change due to contractor availability, subsurface conditions, weather, equipment, and available material resources.

**Table 1: Schedule of Closure Activities**

	<b>Closure Activity</b>	<b>Estimated Date</b>
1.	Decommissioning of Utilities	October 2019
2.	Excavation of CCR and disposal in CCR Monofill	November/ December 2019
3.	Verification Sampling of Soil and Additional Excavation (if needed)	December 2019 /January 2020
4.	Final Grading	February 2020
5.	Placement of Vegetative Soil Cover	February 2020
6.	Seeding and Mulching	April 2020

**5.0 QUALIFICATIONS AND CERTIFICATION**

The signature of AECOM's authorized representative on this document represents that to the best of AECOM's knowledge, information and belief in the exercise of its professional judgment, it is AECOM's professional opinion that the aforementioned information is accurate as of the date of such signature. Any recommendation, opinion, or decisions by AECOM are made on the basis of AECOM's experience, qualifications and professional judgment and are not to be construed as warranties or guaranties. Certification by a qualified engineer is not required for clean closure since it does not require the design of a final cover system.



SIGNATURE: \_\_\_\_\_

DATE: June 25, 2019

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