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Dec. 9, 2021

Ms. Pierce:

In accordance with the Coal Combustion Residuals (CCR) Rule, 40 CFR 257 Subpart D, Rawhide Energy Station has worked with AECOM on groundwater monitoring activities. As discussed in previous correspondence, 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, at the Rawhide Energy Station. 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 has been working with AECOM to continue groundwater sampling and analysis and will evaluate groundwater results to determine an appropriate remedy for Cobalt at the BAT impoundments. Platte River removed the BAT impoundments in summer and fall of 2020 and received CDPHE's approval of the construction completion certification report on Oct. 6, 2021. 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). We will continue communicating the progress regarding selection and implementation of the remedy.

Please contact us with any questions you may have.

A handwritten signature in black ink that reads "Courtney Stewart". The signature is written in a cursive, flowing style.

Courtney Stewart, PE  
Senior environmental engineer

Cc: Lea Schneider, environmental health planner, Larimer County