



December 6, 2023

BY EMAIL: [taylor.pierce@state.co.us](mailto:taylor.pierce@state.co.us)

Taylor Pierce, PE  
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 (BAT) ponds in accordance with CCR Rule 40 CFR 257.97(a)

Ms. Pierce:

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. Platte River installed a second monitoring well in July 2023 near BAT-05 to confirm sampling results collected from BAT-05 to date. 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.

*Courtney Stewart*

Courtney Stewart, PE  
Senior environmental engineer  
Platte River Power Authority

cc: Lea Schneider, environmental health planner, Larimer County