

December 1, 2015

Mr. Larry Bruskin
Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South
Denver, CO 80246-1530

**RE: Notification Required by 40 CFR 257.106 - Final CCR Rule
Notice of Intent to Initiate Closure
Arapahoe Station, Inactive CCR Surface Impoundments**

Dear Mr. Bruskin:

Although not required by 40 CFR Part 257.100(c)(1) of the Disposal of Coal Combustion Residuals from Electrical Utilities Rule (Federal CCR Rule), finalized on April 17, 2015, Public Service Company of Colorado (PSCo), an Xcel Energy Company, is submitting this Notice of Intent (NOI) to initiate closure of three inactive CCR surface impoundments at Arapahoe Station in the City and County of Denver, Colorado. Previously under Colorado Section 9 regulations, an Inventory and Preliminary Classification Report (IPCR) was accepted by the Colorado Department of Public Health and Environment (CDPHE) on January 16, 2014, and a Closure Plan was submitted to CDPHE on November 17, 2014.

Arapahoe Station ceased producing electricity and closed operations on December 31, 2013; prior to the effective date of the CCR Rule. Therefore, the CCR Rule does not apply to the former CCR units at Arapahoe Station per 40 CFR 257.50(e). An Independent Power Producer is located on the Arapahoe Station property, but is a separate entity and operation from Arapahoe Station and only operates natural gas-fired combined-cycle units. These gas fired units never discharged to any of the CCR units. The existence of the Independent Power Producer on site also does not trigger applicability of the CCR Rule.

Regardless, three (3) inactive CCR surface impoundments (North Stormwater/Process Water Pond, South Stormwater/Process Water Pond, and the Polishing Pond) will be closed through the removal of CCR (clean-closure option) in accordance with both the Code of Colorado Regulations, 6 CCR 1007-2 Part 1, Section 9, Waste Impoundments and the Federal CCR Rule §257.100(b)(5). See attached Figure for inactive impoundment locations.

The closure will consist of removing all CCR (an estimated 76,000 cubic yards), potential liners, and impacted soils, if any, within the impoundment areas to meet Federal CCR Rule regulations and Colorado clean-closure unrestricted use criteria. "Impacted soils" are soils impacted by the site industrial activity with constituent criteria that exceed the site appropriate allowable constituent levels per the CDPHE and EPA Regional Screening Level tables for the appropriate final site use. All CCR, impacted soils, and liners removed will be characterized and either used as a beneficial reuse or transported to a licensed off-site landfill for disposal. Soils below any removed liner will be characterized and, if impacted, disposed of at an off-site landfill.

As all three impoundments have standing water, the impoundments will be allowed time to dewater via evaporation. Residual liquids, if any, will be removed mechanically and characterized for potential on-site uses such as dust suppression and soil compaction. If not suitable for on-site use, liquids will be transported to a licensed off-site facility for disposal.

CDPHE will be notified a minimum of 60 days in advance of closure activities. The three impoundments are scheduled to be closed on or before April 17, 2018. A closure certification report will be submitted to CDPHE within 60 calendar days of completion of closure activities.

If you have any questions regarding this information, please contact me at (303) 294-2165 or contact Xcel Energy's consultant, Ms. Anna Lundin, at (303) 323-9805.

Sincerely,



Quinn V. Kilty
Manager, Environmental Services

Attachments (2): CCR Closure Certification
 Site Figure

cc:

Mr. Edward Smith, CDPHE Unit Leader Compliance Assurance
Dino Lombardi, Xcel Energy
Marie Vagher, Xcel Energy
Jennifer McCarter, Xcel Energy
Anna Lundin, HDR Inc.

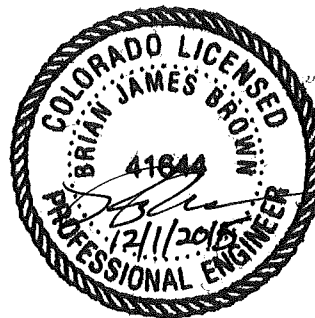
CERTIFICATION

**Public Service Company of Colorado, an Xcel Energy Company
Arapahoe Station
Inactive CCR Surface Impoundment Closures
Denver, Colorado**

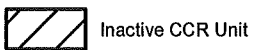
I hereby certify that it is technically feasible to close three (3) inactive surface impoundments (North Stormwater/Process Water Pond, South Stormwater/Process Water Pond, and Polishing Pond) at the Public Service Company of Colorado, an Xcel Energy Company, Arapahoe Station through the removal of CCR (clean-closure option) under Section 257.100(b)(5) of the Federal CCR Rule and that the clean-closures can be completed no later than April 17, 2018 as required under Section 257.100(b) of the Federal CCR Rule. I am duly licensed Professional Engineer under the laws of the State of Colorado.

Brian Brown, PE (Colorado PE 41644) December 1, 2015

My license renewal date is October 31, 2017.



LEGEND

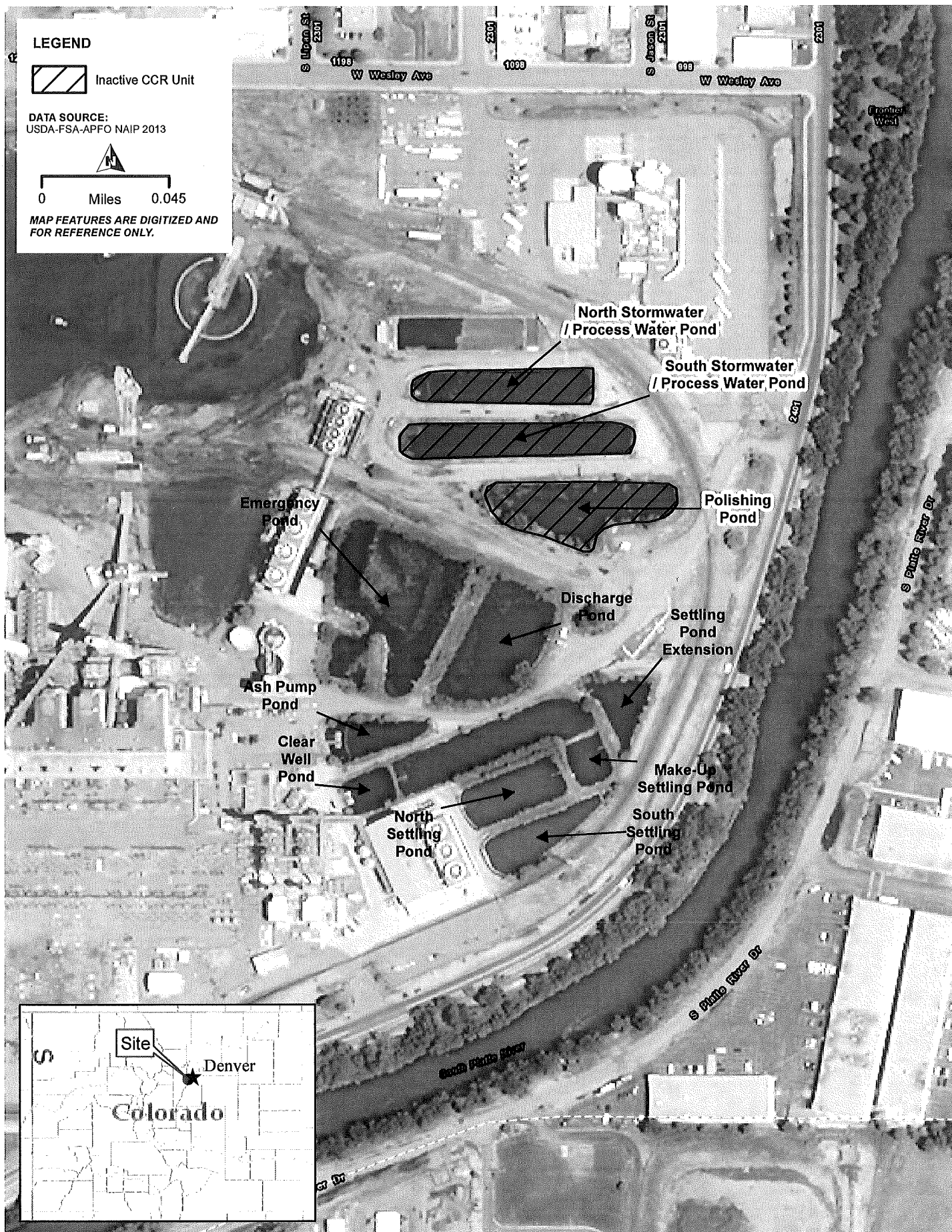


Inactive CCR Unit

DATA SOURCE:
USDA-FSA-APFO NAIP 2013



MAP FEATURES ARE DIGITIZED AND
FOR REFERENCE ONLY.



ARAPAHOE POWER STATION
DENVER COUNTY, CO