

Comanche Station CCR Landfill

Two-Year Extension for Initiation of Closure

Public Service Company of Colorado (PSCo), an Xcel Energy Company, is the owner of Comanche Station, which is a coal-fired, steam turbine electric generating station. The CCR Landfill is comprised of multiple cells used for final disposal of fly ash and bottom ash. The last receipt of these wastes in Cell 1 on November 15, 2019 represented the beginning of an idling period, during which time the landfill has not been receiving waste. However, additional CCR is planned to be disposed in the unit. During this idle period, intermediate cover was placed over the interim top of waste grade. This document was prepared to demonstrate that the CCR landfill meets the requirements of 40 CFR 257.102(e)(2)(ii) for a two-year extension of time to initiate closure.

The requirements to support a two-year extension to initiate closure are as follows.

257.102(e)(2)(ii)(A) requires information documenting that the CCR unit has remaining storage or disposal capacity.

The landfill is designed and has been constructed in phases as additional disposal capacity is needed. Cell 1 of the landfill reached intermediate grade of approximately 4,900' in November 2019, and interim cover was installed. CCR disposal since then has been in Cell 2. The design is such that when Cell 2 reaches intermediate grade, additional CCR will be disposed again in Cell 1. The final design elevation for Cell 1 is 4,920' which represents remaining air space of approximately 900,000 cubic yards.

257.102(e)(2)(ii)(B) requires information demonstrating that there is a reasonable likelihood that the CCR unit will resume receiving CCR or non-CCR waste streams in the foreseeable future, and a best estimate as to when the CCR unit will resume receiving these waste streams.

A number of factors have contributed to the extended timeframe for reaching intermediate grade in Cell 2 and resuming CCR placement in Cell 1. There are currently three coal fueled electric generating units at Comanche Station. The largest, Unit 3 was in an extended outage in 2020 and did not generate CCR during this period. Additionally, all three units have been subject to periodic curtailment as renewable generating resources are expanded within the generation fleet; therefore, less CCR overall has been produced, utilizing less capacity. However, CCR placement in Cell 1 is expected to resume by November 2023.

257.102(e)(2)(iii) requires the owner or operator of the CCR unit to include a certification signed by the owner or operator or an authorized representative

Certification Statement:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Quinn V. Kilty Digitally signed by Quinn V. Kilty
Date: 2021.11.15 09:27:43 -07'00'

November 15, 2021

Quinn Kilty
Manager Environmental Services

Date