

## McCarter, Jennifer

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**From:** McCarter, Jennifer  
**Sent:** Thursday, December 1, 2022 4:08 PM  
**To:** Jacobson, Linda  
**Cc:** Kilty, Quinn V  
**Subject:** Comanche Groundwater Notification of Concentration Exceedances and SSLs Sept 2022 sample event

Hi Linda,

In our October monthly report, submitted on November 10, 2022, we described the updated background threshold values (BTVs) that were developed for the bottom ash impoundment, using data from background well W-2C, and reported SSIs and SSLs from comparison of the updated BTVs to downgradient monitoring results between December 2021 and August 2022. At that time, we had not yet received all results from the September 2022 sample event.

We have now received all results of the September sampling event for Comanche and HDR has completed their data validation. This email serves as our notification under Par. 95(d)(i) of the Consent Agreement, that concentrations of cadmium, cobalt and radium exceeded standards in the September sample results as summarized in the first table below. During this sample event, only W-6B1, W-10B, W-14, and W-16 were sampled, as part of continuing background sampling on these new wells. This was the 8<sup>th</sup> sample event for W-6B/6B-1 and the 6<sup>th</sup> sample event for the other three wells. In addition to the concentration exceedances at W-6B-1, statistical evaluation of the 8 background values have also identified SSLs for cadmium, cobalt and radium as summarized in the second table below.

The analytical results for September will be included in the next Monthly Progress Report, unless requested by EPA to be delivered more quickly.

<b>Comanche Station CCR Impoundment September 28-30, 2022 Groundwater Sampling Event Wells with Concentrations over Groundwater Protection Standards</b>			
<b>Appendix IV Parameters with Concentration Exceedances</b>	<b>Cadmium (mg/L)</b>	<b>Cobalt (mg/L)</b>	<b>Radium (pCi/L)</b>
<b>GPS (Updated Based on Well W-2C)</b>	0.0063	0.0092	8.15
<b>Monitoring Wells with GPS Concentration Exceedances</b>			
<b>W-6B1</b>	0.027	0.13	11.5
<b>W-14</b>		0.011	
<b>W-16</b>		0.018	

Comanche Station CCR Impoundment September 28-30, 2022 Groundwater Sampling Event Wells with Appendix IV SSLs			
Appendix IV Parameters with SSLs	Cadmium (mg/L)	Cobalt (mg/L)	Radium (pCi/L)
GPS (Updated Based on Well W-2C)	0.0063	0.0092	8.15
Monitoring Well	LCLs (through Sept 2022) that Exceed GPS		
W-6B1	0.0089	0.068	8.48

**Jennifer McCarter, R.E.M.**

**Xcel Energy**

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