

2020 Annual Inspection Report

for Compliance with the Coal
Combustion Residuals Rule
(40 CFR Part 257)

Hayden Station

*13125 U.S. Highway 40
Hayden, Colorado 81638*

January 18, 2021



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Certification

Hayden Station - CCR Unit 2020 Annual Inspection for Compliance with the Federal Coal Combustion Residuals Rule

I hereby certify that the Coal Combustion Residuals (CCR) unit (i.e. the landfill) at Hayden Station meets the inspection and operation standards specified in 40 CFR Part 257.84(b) of the Federal CCR Rule. The Hayden Station is owned by the Public Service Company of Colorado (PSCo), an Xcel Energy Company.

I am duly licensed Professional Engineer under the laws of the State of Colorado.



Brent Learch, PE

Colorado PE License 0056841

License renewal date October 31, 2021

1 Introduction

On April 17, 2015 the U.S. Environmental Protection Agency (EPA) published regulations under Subtitle D of the Resources Conservation and Control Act (RCRA) meant to control the safe disposal of coal combustion residuals (CCR) generated by coal fired electric utilities. The rule defines a set of requirements for the disposal and handling of CCR within CCR units (defined as either landfills or surface impoundments). Hayden Station has one CCR unit: a landfill. As specified in 40 CFR 257.84(b), *“Existing and new CCR landfills and any lateral expansion of a CCR landfill must be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.”*

This is the 2020 annual inspection report for the Hayden CCR landfill. This report must be completed and placed into the facility operating record no later than January 18, 2021.

The requirements of the annual inspection include:

- A review of available information regarding the status and condition of the CCR unit - §257.84 (B)(1)(i),
- A visual inspection of the CCR unit to identify signs of distress or malfunction - §257.84 (B)(1)(ii),
- An inspection report that includes the following:
 - Changes in geometry since the last inspection - §257.84 (B)(2)(i)
 - Approximate volume of CCR in unit at time of inspection - §257.84 (B)(2)(ii)
 - Appearance of actual or potential structural weakness of the CCR unit - §257.84 (B)(2)(iii)
 - Any other changes which may have affected the stability or operation of the CCR unit since the last inspection - §257.84 (B)(2)(iv)

2 Site Inspection

In accordance with §257.84(b)(ii), a site inspection of the Hayden CCR unit was conducted by an independent Professional Engineer on October 28, 2020. This site inspection was performed in advance of the CCR submittal deadline to ensure that the inspection was completed prior to snow covering the ground given the high elevation of this facility. The visual site inspection was conducted by Brent Leach, a Colorado Professional Engineer of HDR Engineering, Inc. Review of the associated paper work and inspection reports was conducted by Brent Leach and Mark Stewart, an Xcel Energy Environmental Analyst for the Hayden Station.

The weather during the site visit was sunny with clear skies and approximately 353 degrees Fahrenheit. The site was partially covered with a thin layer of snow.

3 Review of Available Information

Numerous documents pertaining to the site operation and structural integrity were reviewed including:

1. Engineering Design and Operation Plan (EDOP) (Final EDOP dated July 29, 2019, prepared by Burns & McDonnell Engineering Company, Inc. with CDPHE conditional approval letter dated August 29, 2019). Document included all applicable documentation required by CDPHE including but not limited to Design Drawings, Groundwater Monitoring Plan, CQA Plan, and a Final Closure Plan. Xcel Energy Environmental Analyst reported operating under this document.
2. CDPHE reportedly had not conducted a site visit to the landfill area as of October 28, 2020. The last site inspection conducted by CDPHE occurred in August of 2019.
3. Weekly CCR Landfill Inspection Forms (per Section 257.84(a)).
4. October 2020 As-Built Survey with updated topography with the most recent field work dates of October 5 and October 6, 2019, performed by Four Points Surveying and Engineering.
5. Records of annual ash tonnage delivered to the CCR landfill from the generation facility from November 2019 through October 2020.

Review of the above documents did not contain any indications of operation, safety, or structural concerns regarding the CCR landfill.

4 Visual Inspection

Brent Learch completed a site inspection covering the entire landfill area. As the CCR rule pertains only to the CCR landfill itself, this report does not address existing topsoil stockpiles and native earth excavations that lie east of the landfill (located on native ground).

The site inspection included an evaluation of the following landfill features:

1. landfill side slopes and toe of slope;
2. landfill side slope benches;
3. Lined contact storm water pond;
4. upper water quality pond (northwest pond);
5. stormwater drainage conveyance channels (southern, western, northwestern, and eastern);

6. lower storm water ponds (toe of landfill – northwest and southwest);
7. access roads;
8. active CCR fill areas (CCR disposal, spreading, and compaction); and
9. temporarily soil covered CCR landfilled areas.

The following are the findings of the site inspection:

- The landfill side slopes have grades of approximately 4 horizontal to 1 vertical (4H:1V); well established vegetation; and show little to no signs of erosion and no signs of operational or functional concerns.
- The side slopes are constructed with erosion control benches at regular intervals. Benches are approximately 10 feet in width. In areas of more recent filling, benches were developed with a back slope to create a swale that directs stormwater runoff to a downchute channel. In older portions of the landfill, benches simply create a flat area to slow stormwater flow. The older portions of the benches have substantial vegetation cover and limited areas of minor rill erosion. The benches showed no signs of operational or functional concern.
- Areas where a topsoil layer had previously been placed and stabilized with seeding were functioning as intended. Small and localized areas of minor rill erosion was observed and should continue to be monitored. Rill erosion in these areas posed no apparent operational or structural concerns.
- In general, areas more recently constructed where a topsoil layer has not yet been installed and vegetation not yet established were showing minor rill erosion. This is expected due to the slope grades and lack of vegetation. Rill erosion in these areas posed no apparent operational or structural concerns. Once the topsoil layer is placed, seeded, and a dense stand of vegetation established, the bank faces are anticipated to be stabilized.
- All four site stormwater management ponds (three non-contact ponds and one contact pond) appear to be functioning as intended with no operational or structural concerns. The conveyance channels into the three perimeter non-contact stormwater ponds appear adequately armored with articulated concrete block or erosion control blankets to minimize concentrated conveyance erosion in the conveyance channels. The conveyance routes to these three perimeter stormwater ponds and the ponds themselves were not observed to have functional or operational concerns. The Contact Stormwater Pond has a perimeter fence sufficient to prevent access by wildlife and the pond is lined to minimize stormwater infiltration into the CCR landfill.
- The access roads to the top of the landfill showed no signs of operational or structural concern. The road side slopes were vegetated and had minimal rill erosion. The plateau road showed no signs of operational or structural concern.
- There was active CCR disposal during the site inspection with placement of CCR material. The material was observed during unloading into piles but spreading and compaction was not observed during the inspection. On-site equipment and reported

operational procedures have not changed since the prior inspection. Wind blown CCR was not observed during site observation.

- The capped CCR landfill areas appeared to have adequate soil cover, had established vegetation, and showed no signs of operational or structural concern.

5 Changes in Geometry

The Federal CCR Rules require that site geometry changes be identified since the last inspection. The site geometry changed in several areas since the previous inspection due to continued CCR disposal, top landfill grading modifications, and construction of additional perimeter soil embankment. Specific changes are listed below:

1. Continued construction of an interior berm in the south portion of the middle cell. The interior berm spans from the haul road adjacent to the contact water pond to the perimeter berm along the western edge of the landfill.
2. The top plateau of the main landfill area continued to accept CCR in the middle cell along the previously constructed interior berm in the south portion of the middle cell, and will continue until it reaches intermediate design grades. Lifts continue to be constructed with CCR placement, followed by an intermediate soil cover to create a stepped slope that matches the remainder of the western face.
3. CCR was placed in the former access road at the northern perimeter of the landfill to a height of approximately 10 feet followed by placement of intermediate soil cover. The western side slope was constructed with an erosion control bench approximately 10 feet in width. A temporary stormwater pond was also constructed on the western portion of the fill area to collect non-contact stormwater which is then pumped to the northwestern non-contact perimeter stormwater pond.

No structural or safety concerns were observed due the site geometric changes. Fill placement is expected to continue in a similar manner in the main landfill plateau top and continuing south in 2020.

6 Approximate CCR Volume

The reported estimated CCR volume is based on the tonnage of CCR delivered to the landfill from the power plant. The CCR volume was estimated based on the power plant operation and electric load type from 1984 to December 1999. From January 2000 up to the present, Xcel Energy has recorded monthly CCR volumes. The total combined volume of CCR deposited within the landfill through October 2019 was estimated to be 8,672,500 cubic yards. The additional CCR deposited from November 2019 through October 2020 is estimated to be 149,867, assuming one cubic yard of CCR material equates to one ton. The total CCR volume in the landfill as of the end of October 2020 is estimated to be 8,822,367 CY.

7 Appearance of Structural Weakness

Based on the site inspection, no apparent or potential structural weaknesses were observed. Continued monitoring and minor repairs or surface vegetation should be completed to address rill and gully erosion before it becomes a potential structural landfill weakness.

8 Changes Affecting Stability or Operation

There were no observed or reported operation changes that are anticipated to impact the site's near-term or long-term stability. The southern perimeter stormwater conveyance channel that was previously noted to have gully erosion has been regraded and is now armored.

Appendix A – Landfill Site Map

NOTES:

- 1) THIS EXHIBIT WAS PREPARED WITHOUT THE BENEFIT OF A CURRENT TITLE COMMITMENT AND DOES NOT CONSTITUTE A TITLE SEARCH BY FOUR POINTS SURVEYING AND ENGINEERING, LLC. TO DETERMINE TITLE OR EASEMENTS OF RECORD. THIS EXHIBIT DOES NOT PURPORT TO REFLECT ANY OF THE FOLLOWING WHICH MAY BE APPLICABLE TO THE SUBJECT REAL ESTATE: EASEMENTS, OTHER THAN POSSIBLE EASEMENTS THAT WERE VISIBLE AT THE TIME OF MAKING THIS EXHIBIT; BUILDING SETBACK LINES; RESTRICTIVE COVENANTS; SUBDIVISION RESTRICTIONS; ZONING OR OTHER LAND-USE REGULATIONS; AND ANY OTHER FACTS THAT AN ACCURATE AND CURRENT TITLE SEARCH MAY DISCLOSE.
- 2) THIS EXHIBIT WAS PREPARED FOR THE EXCLUSIVE USE OF BASELINE ENGINEERING, INC. AND XCEL ENERGY, INC., NAMED IN THE STATEMENT HEREON. SAID STATEMENT DOES NOT EXTEND TO ANY UNNAMED PERSON WITHOUT AN EXPRESS STATEMENT BY THE SURVEYOR NAMING SAID PERSON.
- 3) THIS EXHIBIT IS VALID ONLY IF PRINT HAS ORIGINAL SEAL AND SIGNATURE OF SURVEYOR.
- 4) THE LOCATIONS FOR UNDERGROUND UTILITIES ARE BASED UPON VISIBLE SURFACE EVIDENCE AND MAPS PROVIDED BY THE APPROPRIATE UTILITY COMPANIES AND MUNICIPALITIES. LOCATIONS OF UNDERGROUND UTILITIES AND/OR STRUCTURES MAY VARY FROM LOCATIONS SHOWN HEREON. ADDITIONAL BURIED UTILITIES AND/OR STRUCTURES MAY BE ENCOUNTERED. NO EXCAVATIONS WERE MADE DURING THE PROCESS OF THIS EXHIBIT TO LOCATE BURIED UTILITIES AND/OR STRUCTURES. ALL UNDERGROUND UTILITIES SHOULD BE FIELD LOCATED BY THE APPROPRIATE UTILITY COMPANY PRIOR TO ANY CONSTRUCTION OR EXCAVATION ON OR ADJACENT TO THE SUBJECT PROPERTY. UTILITIES (CULVERTS, MONITORING WELLS, AND OTHER SELECT UTILITIES) WERE LOCATED FROM THE ORIGINAL SURVEY PERFORMED IN MAY 2014 BY FREMONT ENGINEERING AND SURVEYING AND HAVE ONLY BEEN UPDATED IF CHANGED OR IF THE UTILITIES WERE LOCATED DURING THE 2015 AS-BUILT DRAWING.
- 5) THE DISTANCE MEASUREMENTS SHOWN HEREON ARE U.S. SURVEY FOOT.
- 6) HORIZONTAL AND VERTICAL CONTROL ARE 1 1/2" ALUMINUM CAPS AS INDICATED HEREON.
- 7) BASIS OF ELEVATIONS: VERTICAL CONTROL WAS ESTABLISHED BY RTK GPS FROM NGS MONUMENT 'AP 1973 STA 8 HDN', PID AB8070, A 3 1/2" BRASS SURVEY DISK IN A CONCRETE MONUMENT HAVING A PUBLISHED ELEVATION OF 6598.5' (NAVD 88 USING GEOID 12A).
- 8) COORDINATE SYSTEM AND DATUM: COORDINATE SYSTEM USED IS A MODIFIED COLORADO STATE PLANE, NORTH ZONE, NAD 83 (2011). CALCULATED COMBINED SCALE FACTOR USED FOR THIS PROJECT IS 0.99965141 AND SCALED FROM THE AFOREMENTIONED NGS MONUMENT USING IT'S RECIPROCAL.
- 9) FLOOD INFORMATION: THE SUBJECT PROPERTY IS LOCATED IN ZONE X, AREAS DETERMINED TO BE LOCATED OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN ACCORDING TO THE FEMA FLOOD INSURANCE RATE MAP; COMMUNITY-PANEL NO. 08107C0810D, DATED FEBRUARY 4, 2005. FLOOD INFORMATION IS SUBJECT TO CHANGE.
- 10) DATES OF FIELDWORK:
- ORIGINAL FIELD WORK WAS PERFORMED BY WALSH ENVIRONMENTAL SCIENTISTS AND ENGINEERS, LLC ON MAY 15-21, 2013. THIS SURVEY LAID GROUND CONTROL FOR THE AERIAL SURVEY THAT WAS COLLECTED AUGUST 28, 2013. AERIAL SURVEY WAS PERFORMED BY ROCKY MOUNTAIN AERIAL SURVEYS, INC. USING LIDAR.
 - OCTOBER 2014 SURVEY WAS PERFORMED TO CONVEY THE WORK PERFORMED FOR THE 2014 CONSTRUCTION SEASON. DATES FOR THESE SELECT AREAS WAS PERFORMED ON OCTOBER 22-23, 2014.
 - OCTOBER 2015 SURVEY WAS PERFORMED BY FOUR POINTS SURVEYING AND ENGINEERING TO CONVEY THE WORK PERFORMED FOR THE 2015 CONSTRUCTION SEASON. DAYS FOR THESE SELECT AREAS WAS PERFORMED ON OCTOBER 14-15, 2015.
 - OCTOBER 2016 SURVEY WAS PERFORMED BY FOUR POINTS SURVEYING AND ENGINEERING TO CONVEY THE WORK PERFORMED FOR THE 2016 CONSTRUCTION SEASON. DAYS FOR THESE SELECT AREAS WAS PERFORMED ON OCTOBER 5, 2016.
 - OCTOBER 2017 SURVEY WAS PERFORMED BY FOUR POINTS SURVEYING AND ENGINEERING TO CONVEY THE WORK PERFORMED FOR THE 2017 CONSTRUCTION SEASON. DAYS FOR THESE SELECT AREAS WAS PERFORMED ON OCTOBER 6 AND OCTOBER 11, 2017.
 - NOVEMBER 2018 SURVEY WAS PERFORMED BY FOUR POINTS SURVEYING AND ENGINEERING TO CONVEY THE WORK PERFORMED FOR THE 2018 CONSTRUCTION SEASON. DAYS FOR THESE SELECT AREAS WAS PERFORMED ON NOVEMBER 8 AND NOVEMBER 12, 2018.
 - OCTOBER 2019 SURVEY AS WAS PERFORMED BY FOUR POINTS SURVEYING AND ENGINEERING TO CONVEY THE WORK PERFORMED FOR THE 2019 CONSTRUCTION SEASON. DAYS FOR THESE SELECT AREAS WERE PERFORMED ON OCTOBER 16 AND 17, 2019.
 - OCTOBER 2020 SURVEY AS WAS PERFORMED BY FOUR POINTS SURVEYING AND ENGINEERING TO CONVEY THE WORK PERFORMED FOR THE 2020 CONSTRUCTION SEASON. DAYS FOR THESE SELECT AREAS WERE PERFORMED ON OCTOBER 5 AND 6, 2020.
- 11) BOUNDARY DETERMINATION IS NOT A PART OF THIS EXHIBIT. THIS IS NOT A "LAND SURVEY PLAT" OR "IMPROVEMENT SURVEY PLAT" AND THIS EXHIBIT IS NOT INTENDED FOR PURPOSES OF TRANSFER OF TITLE OR SUBDIVISIONS OF LAND. PROPERTY LINES AND SECTION LINES ARE APPROXIMATED FOR INFORMATIONAL PURPOSES ONLY. THIS EXHIBIT IS NOT A LAND SURVEY.
- 12) STOCK PILE AREAS HIGHLIGHTED HEREON DO NOT REFLECT ACCURATE TOPOGRAPHY DO TO THE INHERENT IRREGULARITIES THAT EXIST.
- 13) PROPERTY OWNERSHIP INFORMATION SHOWN HERE ON WAS RESEARCHED ON ROUTT COUNTY'S ONLINE MAPPING INFORMATION AS RESEARCHED ON NOVEMBER 3, 2016.
- 14) BOTTOM OF POND WAS NOT SURVEYED AND THEREFORE ELEVATIONS SHOWN ARE NOT REPRESENTATIVE FOR THE BOTTOM OF POND.
- 15) THE CONTACT POND ELEVATIONS SHOWN ARE BASED ON PREPARED SUBGRADE.

LEGEND

- ESTIMATED PROPERTY LINE
- ESTIMATED SECTION LINE
- EXISTING CONTOUR MINOR
- EXISTING CONTOUR MAJOR
- MINOR CONTOUR 2020
- MAJOR CONTOUR 2020
- WIRE MESH FENCE
- FENCE
- PAVED ROAD
- UNPAVED ROAD
- OVERHEAD UTILITY LINE
- FIBER OPTIC LINE
- GAS LINE
- CREEK
- UTILITY POLE
- CULVERT
- MONITORING/DEWATERLING WELL
- OVERHEAD UTILITY LINE EASEMENT
- BLACK MAT - TEMPORARY
- EROSION MAT
- ESTIMATED 2020 CONSTRUCTION LIMITS
- ESTIMATED ACTIVE ASH LIMITS AT TIME OF 2020 SURVEY

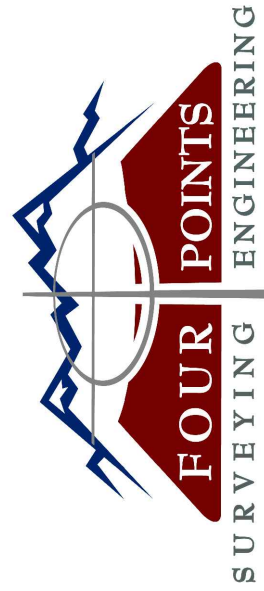
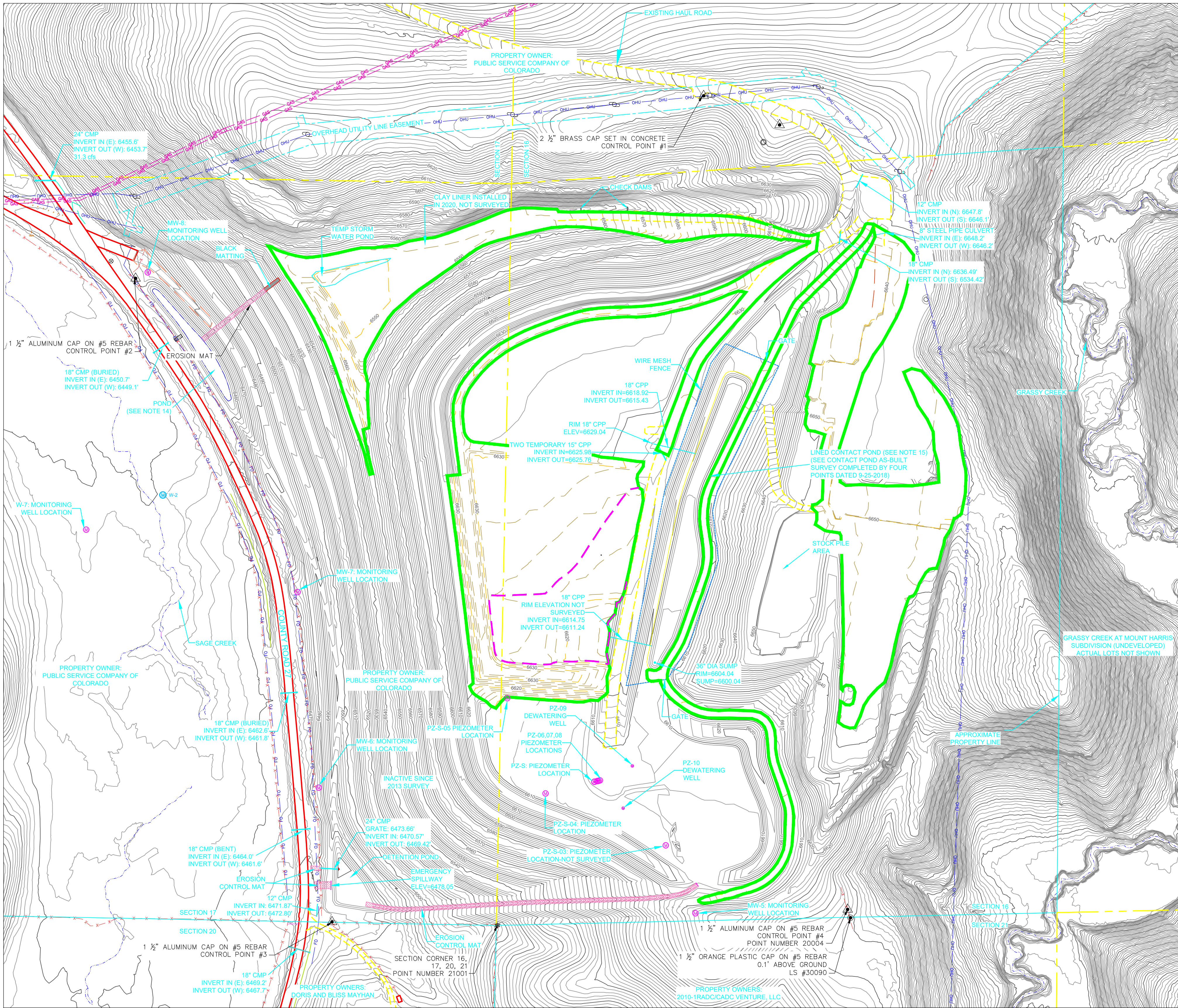
SURVEYOR'S CERTIFICATE

I, WALTER N. MAGILL, BEING A DULY REGISTERED LAND SURVEYOR IN THE STATE OF COLORADO, DO HEREBY CERTIFY THAT THE SURVEY (I) WAS PERFORMED BY ME OR UNDER MY DIRECT SUPERVISION, (II) HAS BEEN PREPARED IN COMPLIANCE WITH ALL APPLICABLE LAWS OF THE STATE OF COLORADO AT THE TIME OF THIS SURVEY, (III) IS ACCURATE TO THE BEST OF MY KNOWLEDGE AND (IV) CONTAINS ALL OF THE INFORMATION REQUIRED BY C.R.S. 38-51-102 (9) AND C.R.S. 38-51-103, 38-51-104 38-51-105 AND 38-51-106.

WALTER N. MAGILL, REGISTERED LAND SURVEYOR, PLS 38024
STATE OF COLORADO

TOPOGRAPHIC EXHIBIT

LOCATED IN THE SOUTHEAST QUARTER OF SECTION 17 AND THE SOUTHWEST QUARTER OF
SECTION 16, TOWNSHIP 6 NORTH , RANGE 87 WEST OF THE 6TH P.M.,
COUNTY OF ROUTT , STATE OF COLORADO
SHEET 1 OF 1



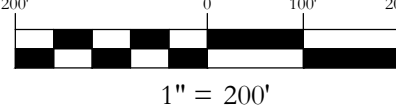
440 S. Lincoln Ave, Suite 4B
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(970)-871-6772
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No.	DATE	REVISIONS	
		INT	MDM
1	11/12/20		

HAYDEN POWER PLANT

HAYDEN, CO

Horizontal Scale



1" = 200'

Contour Interval = 2 ft

DATE: 10/23/2020
JOB #: 1453-001
DRAWN BY: MDM
DESIGN BY: MDM
REVIEW BY: BL

IF THIS DRAWING IS PRESENTED IN A
FORMAT OTHER THAN 24" X 36" THE
GRAPHIC SCALE SHOULD BE UTILIZED.

October 2020
As-built Survey

DRAWING:

SHEET #

1