



1800 Larimer St., Suite 1300 ♦ Denver, CO 80202-1414

August 10, 2022

Ms. Sabina Genesio
Pueblo County Manager
215 W. 10th Street
Pueblo, CO 81003

RE: Notification of Groundwater Monitoring Results for Comanche Station Bottom Ash Pond

Dear Ms. Genesio,

This letter is to notify Pueblo County of groundwater monitoring results at the Comanche Station bottom ash pond (BAP) which indicate that impacts to groundwater from the BAP may extend beneath County Road 302 (Lime Road) immediately adjacent to Comanche Station.

Protecting the environment by adhering to regulations and our ongoing stewardship is a priority for Xcel Energy, and this includes monitoring our operations to ensure they meet all clean air and water requirements. Under the EPA's Coal Combustion Residual Rule (CCR rule), utilities across the country that dispose or store coal ash on their properties must follow a prescriptive, phased process for monitoring groundwater, identifying and reporting any elevated constituents, and then addressing those issues through corrective measures. This rule applies to the ash landfill and bottom ash pond located at Comanche Station. One specific requirement of the CCR Rule is to notify adjacent landowners if elevated constituents from the landfill or bottom ash pond have migrated offsite.

This letter serves as formal notification to Pueblo County that results of groundwater monitoring indicate that concentrations of cobalt are present above groundwater protection standards (GPS) in a monitoring well (W-7) on the eastern property boundary of Comanche Station (Figure 2, attached). Water levels measured in monitoring wells show that groundwater in this area flows to the southeast, and a similar notice has been provided to Pueblo CS, LLC's, the owner of the property east of Lime road at this location. Groundwater is naturally occurring subsurface water present in the cracks and spaces in soil, sand and rock. We routinely perform groundwater monitoring at Comanche Station in accordance with state solid waste regulatory requirements. State records do not show any uses of groundwater at this location beneath Lime Road nor on the Pueblo CS, LLC property.

The bottom ash pond is located in the southeastern area of Comanche Station. We monitor groundwater around the pond through a system of wells located in the direction of groundwater flow away from the pond, including two wells (W-7 and W-9) located on the Comanche Station southeastern property boundary (see attached figure). Monitoring shows that the concentration of one trace element, cobalt, is present at statistically significant levels (SSL) above groundwater protection standards (GPS) in well W-7 located on Comanche Station property. Based upon this result, PSCo installed two monitoring wells, designated as W-15 and W-16, on property owned by Pueblo CS, LLC east of Comanche Station. Well W-15 has been dry but will continue to be checked for the presence of water and sampled if present. Well W-16 produced water, is being regularly sampled and we have results from the first two sampling events, in April and May 2022. The April result showed that cobalt was below the GPS. The May result showed that cobalt was present at a concentration of 0.011 mg/l which is slightly above the cobalt GPS of 0.0102 mg/l specific to the bottom ash pond. We are continuing to sample W-16 to further evaluate the cobalt concentration. Although we do not have additional monitoring wells between W-7 on our property and W-16 on the Pueblo CS, LLC property, interpretation of the concentrations between these wells indicates that the concentration of cobalt in groundwater beneath Lime Road also exceeds the GPS.

Based on the single cobalt concentration exceedance of the GPS in well W-16 and the slow rate at which groundwater is known to move through the shale bedrock in this area, it is possible that the concentration exceedance of this small amount could be within the natural variability of background water quality. Currently, we have no reason to believe there are impacts to local surface or drinking water, or any public exposure. The additional samples that we will collect from well W-16 will help to evaluate whether the cobalt concentrations appear to be related to the bottom ash pond. If so, we will evaluate appropriate next steps in accordance with the CCR rule requirements. This could include installation of additional monitoring wells beyond the W-16 location, groundwater modeling, and evaluation of potential corrective actions to prevent cobalt from moving beyond our property boundary. Conducting our business in an environmentally responsible manner is a priority for us, and we are making every effort to complete this evaluation as soon as possible.

PSCo ceased using the bottom ash pond in 2021 and intends to complete closure of the pond by removing all ash and impacted soils within five years. Groundwater monitoring at the bottom ash pond will continue under both state and federal programs until results of groundwater samples from the monitoring wells meet the GPS. We are committed to addressing the groundwater condition and will keep Pueblo County and Pueblo CS, LLC informed throughout the process. In the interim, if you have questions regarding the status of the groundwater monitoring related to Comanche bottom ash pond, you can contact me at 303-294-2165. You can find additional information about how we manage coal ash and the groundwater monitoring program at Comanche Station on our CCR Rule Compliance Data and Information website, [Xcel Energy Coal Ash Management](#).

Sincerely,

Quinn Kilty,
Environmental Services Manager
Xcel Energy

Attachment:

Figure 2, Comanche Station Monitoring Well Locations

cc: Linda Jacobson, EPA Region 8
Chad Wolgram, Pueblo County Department of Public Health and Environment
Jill Parisi, CDPHE Unit Leader, Solid Waste Permitting - Engineering Design Unit

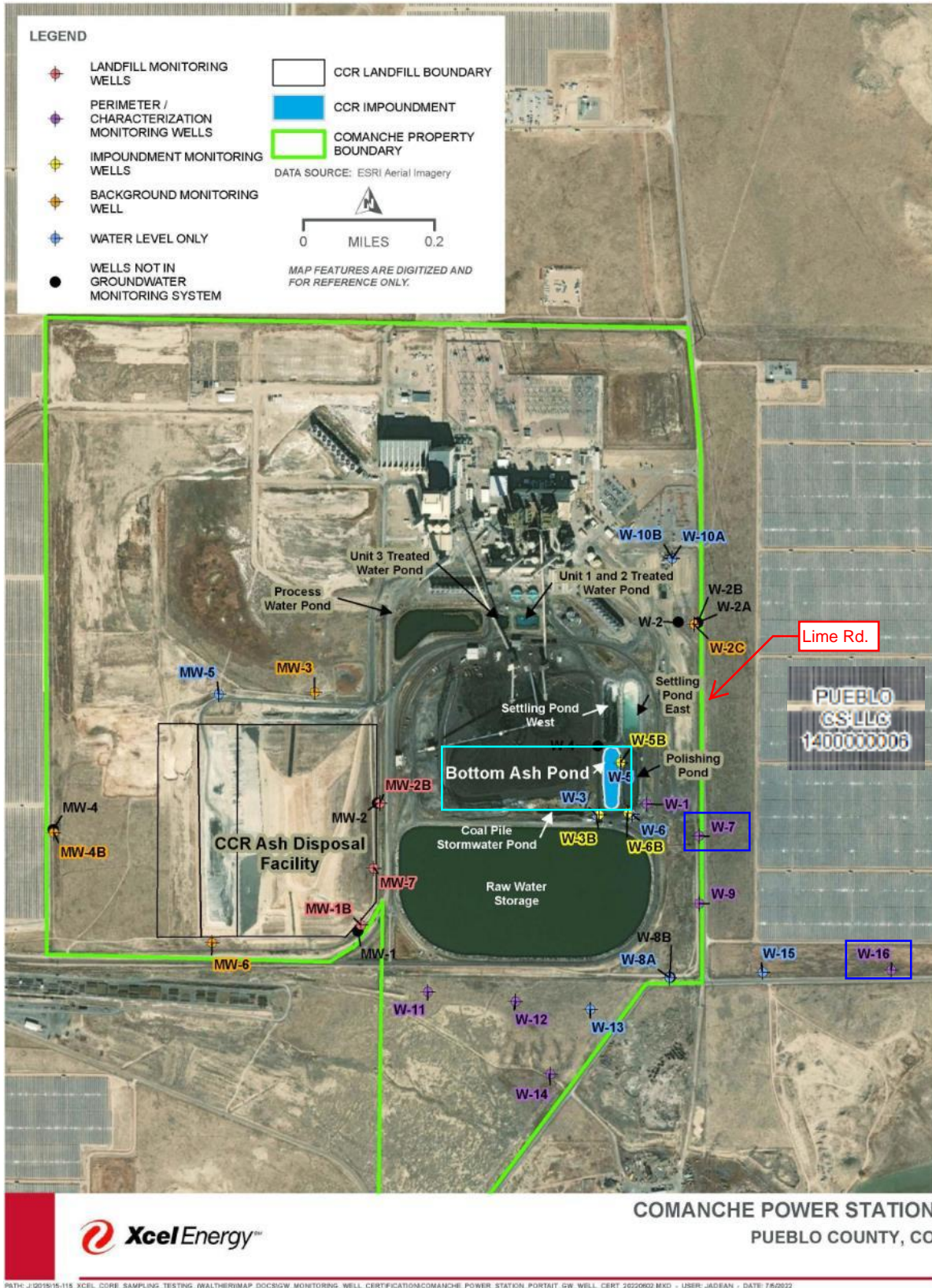


Figure 2. Comanche Station – CCR Units and Monitoring Well Location Map