



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

March 17, 2023

Via Mobility Services
Mr. Frank Bruno
855 63rd St.
Boulder, CO 80301

RE: Notification of Groundwater Monitoring Results for Monitoring Well MW-43 on Via Mobility Services Property

Dear Mr. Bruno,

Thank you for your support and that of your staff as Public Service Company of Colorado (PSCo), an Xcel Energy Company, and our consultant HDR, Inc. installed a groundwater monitoring well on property owned by Via Mobility Services under the December 14, 2022 Property Access Agreement. The well, MW-43, was installed on December 28, 2022 and was sampled on January 24, 2023 and we have received the laboratory results from that sample event. The well log and laboratory report are attached for your records, and this letter provides discussion of these results.

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 located at Valmont Station. We routinely perform groundwater monitoring at Valmont Station in accordance with state solid waste regulatory requirements. Groundwater is naturally occurring subsurface water present in the cracks and spaces in soil, sand and rock. This letter serves as formal notification to Via Mobility Services regarding results of this first groundwater sample event, which indicate that one trace element, lithium is present at concentrations in excess of groundwater protection standards (GPS) in well MW-43 on Via Mobility Services' property west of Valmont Station. Lithium is a naturally occurring element present in rock, coal and groundwater. Results from the January 2023 sample event show that the concentration of lithium in groundwater in MW-43 is 0.066 milligrams/liter (mg/l), which is slightly above the applicable

lithium groundwater protection standard of 0.051 mg/l. All other constituents that were tested for in MW-43 were non-detect or otherwise met the CCR groundwater protection standards that trigger corrective action for the area. Concentrations of elements in groundwater can and do vary and additional samples are needed in order to identify the potential range of lithium concentrations in MW-43; we would expect future samples to produce results that may be either slightly lower or slightly higher than this initial sample, and this is normal.

Although groundwater can be used for drinking water, state records do not show any wells on the Via Mobility Services property that are used for drinking water or agricultural/stock water supplies. The basis for EPA's groundwater protection standards for a site can vary depending upon the substance being tested and the natural or 'background' quality of the groundwater in the area. The groundwater protection standard for a substance could be based upon a drinking water standard, other EPA regulatory standard or the background water quality in the area. EPA conservatively sets these standards to protect human health and the environment. There is no drinking water standard for lithium, but under the CCR Rule, the groundwater protection standard for lithium, based on background water quality in the area, is 0.051 mg/l. The term background refers to the concentration of a substance that would be considered naturally occurring without the impact of operations.

Substance	EPA Groundwater Protection Standard	MW-43 Result
		January 24, 2023
Lithium	0.051 mg/l (location background value)	0.066 mg/l
Chloride	250 mg/l (regulatory standard, secondary)	370 mg/l
Sulfate	250 mg/l (regulatory standard, secondary)	680 mg/l
Total Dissolved Solids (TDS)	891 mg/l (location background value, secondary standard)	1,700 mg/l

In addition to lithium, your water was tested for some general water quality parameters including chloride and sulfate which are dissolved minerals in the water, and total dissolved solids (TDS) which includes chloride, sulfate and other dissolved minerals. The secondary groundwater standard is 250 mg/l for both chloride and sulfate; secondary standards are based on aesthetic considerations such as the taste, color and odor of the water. High levels are found in water considered 'hard', which is sometimes treated with a water softener. The concentration of chloride in well MW-43 was 340 mg/l, and sulfate was 680 mg/l, both of which are above the secondary drinking water standard of 250 mg/l. The TDS concentrations in groundwater in this area are known to be naturally elevated ('hard' water), and the result from MW-43 was 1,700 mg/l which is above the site-specific background standard for TDS which is 891 mg/l.

Although the concentrations of lithium in MW-43 is slightly above the GPS, we want to update you on our next steps. We will be collecting additional groundwater samples to further evaluate lithium concentrations and help to evaluate whether the lithium appears to be related to the Valmont landfill. If so, we will evaluate appropriate next steps in accordance with the CCR Rule requirements, including continuing to evaluate solutions and develop an action plan to prevent lithium from moving beyond our property boundary. The solutions and action plan will go through a public review process outlined in EPA's Coal Combustion Residual (CCR) Rule, which we expect to have in 2023. Conducting our business in an environmentally responsible manner is a priority for us, and we are making every effort to implement a solution as soon as possible once we complete our analysis and coordinate with the public and federal, state and local regulators. We will continue to work with Boulder County Public Health, the City of Boulder, EPA and the Colorado Department of Public Health and Environment (CDPHE) as appropriate throughout this process.

Groundwater monitoring at the landfill 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 Via Mobility Services informed throughout the process. In the interim, if you have questions regarding the status of the groundwater monitoring related to the Valmont ash landfill, you can contact me at 303-285-6560. 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 V. Kilty Digitally signed by Quinn V. Kilty
Date: 2023.03.17 13:29:54 -06'00'
Quinn Kilty,
Environmental Services Manager
Xcel Energy

Attachments

Figure MW-43 Location
Lab Results January 2023 Sampling, Report J171689-1

cc: Mr. Steve Wisdom, Via Mobility Services
Ms. LaDonna Baker, Via Mobility Services