

1800 Larimer St., Suite 1300 Denver, Colorado 80202

December 1, 2015

Mr. Larry Bruskin Colorado Department of Public Health and Environment Hazardous Materials and Waste Management Division 4300 Cherry Creek Drive South Denver, CO 80246-1530

RE: Notification Required by 40 CFR 257.106 - Final CCR Rule

**Notice of Intent to Initiate Closure** 

Cherokee Station, Inactive CCR Surface Impoundment

Dear Mr. Bruskin:

Pursuant to 40 CFR Part 257.100(c)(1) of the Disposal of Coal Combustion Residuals from Electrical Utilities Rule (Federal CCR Rule), finalized on April 17, 2015, Public Service Company of Colorado (PSCo), an Xcel Energy Company, is submitting this Notice of Intent (NOI) to initiate closure of one inactive CCR surface impoundment at Cherokee Station in Adams County, Colorado. Previously under Colorado Section 9 regulations, an Inventory and Preliminary Classification Report (IPCR) was accepted by the Colorado Department of Public Health and Environment (CDPHE) on January 16, 2014.

One (1) inactive CCR surface impoundment (Cooling Tower Retention Pond) will be closed through the removal of CCR (clean-closure option) in accordance with both the Code of Colorado Regulations, 6 CCR 1007-2 Part 1, Section 9, Waste Impoundments and the Federal CCR Rule §257.100(b)(5). Additional impoundments at Cherokee are not included in this NOI. See attached Figure for inactive impoundment location.

The closure will consist of removing all CCR (an estimated 10,000 cubic yards), potential liner, and impacted soils, if any, within the impoundment area to meet Federal CCR Rule regulations and Colorado clean-closure unrestricted use criteria. "Impacted soils" are soils impacted by the site industrial activity with constituent criteria that exceed the site appropriate allowable constituent levels per the CDPHE and EPA Regional Screening Level tables for the appropriate final site use. CCR from the inactive impoundment will be either beneficially reused or exported to a licensed off-site ash landfill. If it is determined that a liner system exists at the impoundment, the liner and impacted soil below the liner will be removed and disposed of at a licensed off-site facility.

The Cooling Tower Retention Pond is currently dry and is not expected to require dewatering. Residual liquids, if any, will be allowed time to dewater via evaporation or will be removed mechanically and characterized for potential on-site uses such as dust suppression and soil compaction. If not suitable for on-site use, liquids will be transported to a licensed off-site facility for disposal or discharged, if allowed, per the facility's NPDES permit.

CDPHE will be notified a minimum of 60 days in advance of closure activities. The Cooling Tower Retention Pond is scheduled to be closed on or before April 17, 2018. A closure certification report will be submitted to CDPHE within 60 calendar days of completion of closure activities.

If you have any questions regarding this information, please contact me at (303) 294-2165 or contact Xcel Energy's consultant, Ms. Anna Lundin, at (303) 323-9805.

Sincerely,

Quinn V. Kilty

Manager, Environmental Services

Attachments (2):

**CCR Closure Certification** 

Site Figure

CC:

Mr. Edward Smith, CDPHE Unit Leader Compliance Assurance Dino Lombardi, Xcel Energy Marie Vagher, Xcel Energy Jennifer McCarter, Xcel Energy Anna Lundin, HDR Inc.

## **CERTIFICATION**

## Public Service Company of Colorado, an Xcel Energy Company Cherokee Station Inactive CCR Surface Impoundment Closures Denver, Colorado

I hereby certify that it is technically feasible to close the inactive CCR surface impoundment (Cooling Tower Retention Pond) at the Public Service Company of Colorado, an Xcel Energy Company, Cherokee Station through the removal of CCR (clean-closure option) under Section 257.100(b)(5) of the Federal CCR Rule and that the clean-closure can be completed no later than April 17, 2018 as required under Section 257.100(b) of the Federal CCR Rule. I am duly licensed Professional Engineer under the laws of the State of Colorado.

Brian Brown, PE (Colorado PE 41644) December 1, 2015 My license renewal date is October 31, 2017.



