

Pawnee Station Inactive CCR Impoundments
Notification of Compliance with Closure and Post Closure Plan Requirements

The purpose of this document is to demonstrate compliance with 40 CFR 257.102(b) requirements to prepare a written closure plan and 40 CFR 257.104(d) requirements to prepare a written post-closure plan by April 17, 2018 for inactive CCR impoundments (i.e., those CCR impoundments that ceased receiving CCR prior to October 19, 2015, the effective date of the CCR Rule).

Public Service Company of Colorado (PSCo), an Xcel Energy Company, owns and operates Pawnee Station, a coal-fired, steam turbine electric generating station. Pawnee currently operates one CCR unit on site, a landfill that is used for final disposal of CCRs generated at Pawnee Station. Between 1980 and 2005, Pawnee Station operated two lined impoundments for management of bottom ash and ash transport water. Pawnee Station converted to dry handling of bottom ash, and these two impoundments were removed from service in 2005. Both impoundments ceased receiving CCR prior to October 19, 2015, and therefore met the definition of Inactive CCR Surface Impoundments subject to Closure and Post-Closure Care requirements under §257.100.

EPA adopted a Direct Final Rule which provided extended deadlines for CCR Surface Impoundments that were originally defined as inactive and which subsequently became subject to additional requirements of the rule. The adoption of this CCR extension rule had the effect of adding to the closure obligation the requirement that the removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to 257.95(h) for constituents listed in Appendix IV.

The two inactive CCR impoundments at Pawnee Station were closed through removal of CCR between October 6, 2016 and April 10, 2017. Closure of the impoundments was completed with oversight by a Qualified Professional Engineer, who certified that removal of CCR from the impoundments met the criteria in Section 257.102(c). PSCo is implementing a groundwater monitoring program at these impoundments to meet the requirement for verification that groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to 257.95(h) for constituents listed in Appendix IV.

40 CFR 257.102(b) requires that the written closure plan describe the steps necessary to close the CCR unit consistent with recognized and generally accepted good engineering practices. For CCR impoundments originally defined as inactive, the deadline for preparation of the written closure plan is April 17, 2018. Since the removal of CCR from the two inactive impoundments has been completed, a written closure plan is not required. PSCo anticipates the completion of the initial groundwater monitoring report for this site prepared in accordance with 257.90(e) before August 1, 2019.

In accordance with the requirements for the written post-closure plan as described 40 CFR 257.104(d)(2) & (3) CCR units that elect to close by removing the CCR as provided by 257.102(c) are not subject to the post closure care criteria.

Any questions regarding this post should be submitted to our CCR rule inbox at PSCoCCRInquiries@xcelenergy.com