



1800 Larimer St., Suite 1300  
Denver, Colorado 80202

December 1, 2015

Mr. Jace Driver  
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  
Pawnee Station, Inactive CCR Surface Impoundments**

Dear Mr. Driver:

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 two inactive CCR surface impoundments at Pawnee Station in Morgan 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 9, 2013, and a revised Engineering Design & Operation Plan (EDOP) was approved by CDPHE on October 1, 2014.

Two (2) inactive CCR surface impoundments (Ash Water Recovery Pond and Bottom Ash Storage 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). See attached Figure for inactive impoundment locations.

The closure will consist of removing all CCR (an estimated 240,000 cubic yards), liners, and impacted soils, if any, within the impoundment areas 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. All CCR removed from the ponds will be either beneficially reused or transported to the on-site CCR Landfill for disposal. The liners in the ponds will be removed and disposed at a licensed off-site landfill. Soils below the liner will be characterized and, if impacted, will be disposed of at the on-site ash landfill.

Liquids within the impoundments will be allowed time to dewater via evaporation or removed mechanically to an operating on-site impoundment or characterized for potential on-site uses such as dust suppression and soil compaction. If not suitable for on-site impoundment or use, liquids will be transported to a licensed off-site facility for disposal.

Evaporation Pond "A" completed a clean-closure in 2005 and is not part of this NOI. Evaporation Ponds "B", "C", and "D" will remain operational. See attached Figure for Impoundment locations.

CDPHE will be notified a minimum of 60 days in advance of closure activities. The three impoundments are 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.

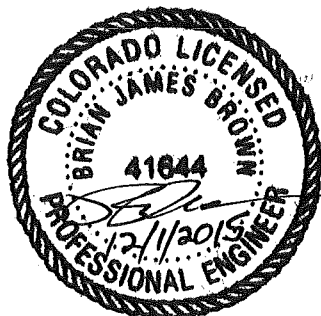
## **CERTIFICATION**

**Public Service Company of Colorado, an Xcel Energy Company  
Pawnee Station  
Inactive CCR Surface Impoundment Closures  
Brush, Colorado**

I hereby certify that it is technically feasible to close the two (2) inactive CCR surface impoundments (Ash Water Recovery Pond and the Bottom Ash Storage Pond) at the Public Service Company of Colorado, an Xcel Energy Company, Pawnee Station through the removal of CCR (clean-closure option) under Section 257.100(b)(5) of the Federal CCR Rule and that the clean-closures 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.



# LEGEND



Inactive CCR Unit



Pawnee Access Control Boundary



Pawnee Property Boundary

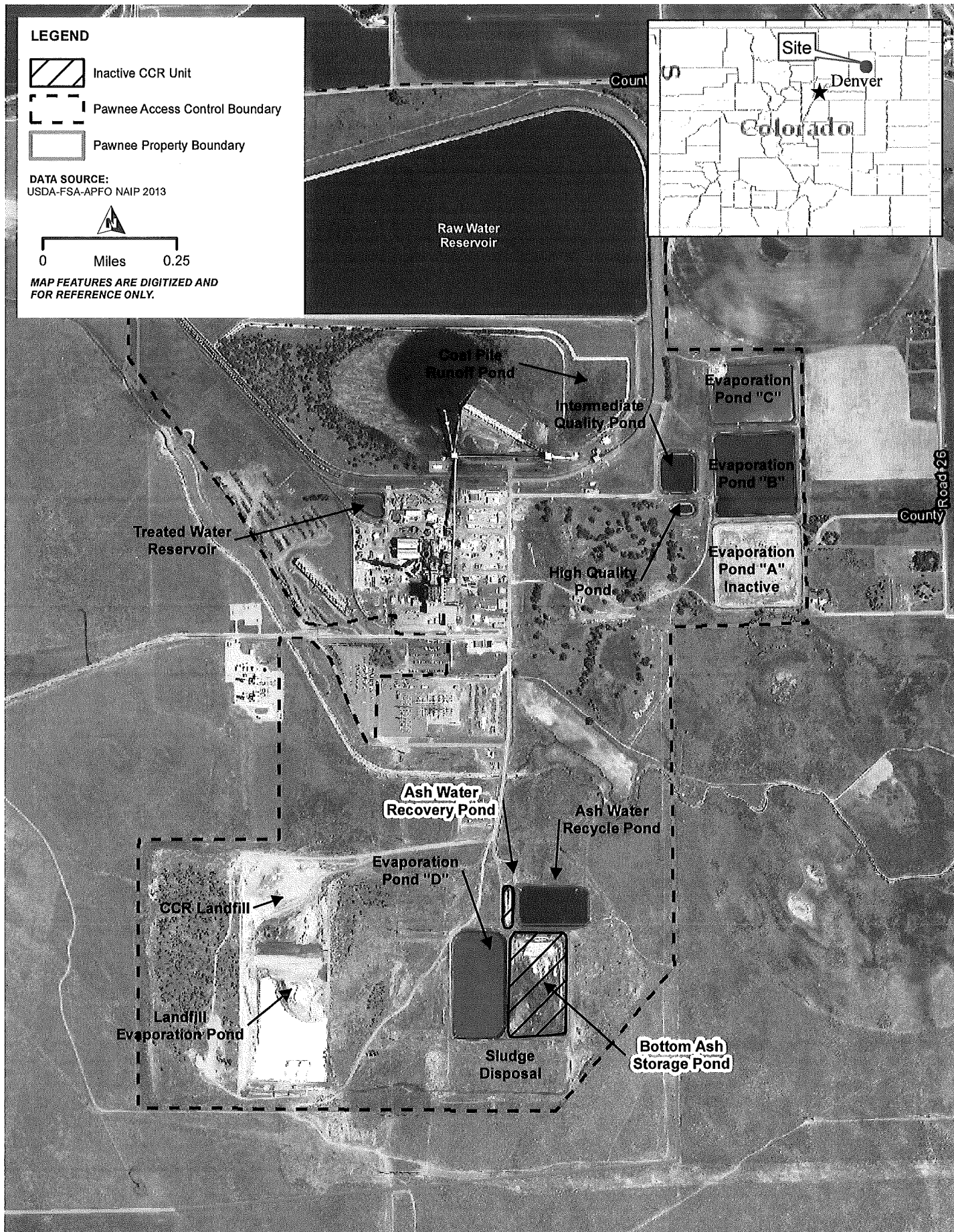
## DATA SOURCE:

USDA-FSA-APFO NAIP 2013



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MAP FEATURES ARE DIGITIZED AND FOR REFERENCE ONLY.



**PAWNEE POWER STATION**  
MORGAN COUNTY, CO