

Valmont Station CCR Landfill Two-Year Extension for Initiation of Closure

Public Service Company of Colorado (PSCo), an Xcel Energy Company, is the owner of Valmont Station, which historically was a coal-fired, steam turbine electric generating station. The station was retired from operations on September 30, 2017. The CCR Landfill was used for final disposal of fly ash, bottom ash and non-CCR waste (coal residuals). The last receipt of these wastes on September 21, 2018 represented the beginning of an idling period, during which time the landfill did not receive waste, but after which additional non-CCR waste was planned to be disposed in the unit. During this idle period, intermediate cover was placed over the interim top of waste grade. This document was prepared to demonstrate that the CCR landfill meets the requirements of 40 CFR 257.102(e)(2)(ii) for a two-year extension of time to initiate closure. A separate future project anticipated to commence in 2022 is expected to generate additional CCR and non-CCR waste which may also require disposal in the landfill.

The requirements to support a two-year extension to initiate closure are as follows.

257.102(e)(2)(ii)(A)

- Information documenting that the CCR unit has remaining storage or disposal capacity

257.102(e)(2)(ii)(B)

- Information demonstrating that there is a reasonable likelihood that the CCR unit will resume receiving CCR or non-CCR waste streams in the foreseeable future.
- Narrative must include a best estimate as to when the CCR unit will resume receiving CCR or non-CCR waste streams

257.102(e)(2)(iii)

- The owner or operator of the CCR unit must include with the demonstration required by paragraph (e)(2)(ii) of this section a certification signed by the owner or operator or an authorized representative

Closure of the former coal yard area was initiated in 2018 by removal of coal residuals from the area and final disposal of the non-CCR material in the CCR landfill. Additional coal residuals remain in this area and were not accessible until existing infrastructure could be removed. The project to remove the remaining non-CCR waste from the former coal yard is anticipated to be completed near end of year 2020. Closure of the CCR landfill will be initiated after completion of placement of this waste.

Section 257.102(e)(2)(ii)(A) requires information documenting that the CCR unit has remaining storage or disposal capacity. The “Valmont Station Landfill Cell D and E Design Modification and Closure Plan (HDR March 2018)” describes a proposed vertical expansion to the landfill to provide additional capacity for final disposal of CCR and non-CCR waste. This plan identifies 221,000 cubic yards of additional capacity resulting from the vertical expansion, which is

sufficient to receive the estimated 100,000 cubic yards of residual coal waste. This plan was approved by the Colorado Department of Public Health and Environment on May 20, 2020.

Section 257.102(e)(2)(ii)(B) requires information demonstrating that there is a reasonable likelihood that the CCR unit will resume receiving CCR or non-CCR waste streams in the foreseeable future. The coal yard closure was initiated in 2018 but could not be completed due to the presence of existing infrastructure. A capital project was created in 2019 to remove the infrastructure and the residual coal waste in 2020. The design modification and closure plan was prepared to permit the necessary additional capacity for the project.

Section 257.102(e)(2)(ii)(B) requires a best estimate as to when the CCR unit will resume receiving CCR or non-CCR waste streams. The capital project to complete the coal yard closure and dispose of the residual coal waste in the CCR landfill has been bid and is expected to begin in October 2020 and completed near end of year 2020. Landfill closure is expected to be initiated in January 2021 and completed in April 2021.

Certification Statement:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Quinn Kilty
Manager Environmental Services

Date