Valmont Power Plant Community Meeting Q & A

Boulder County Recycling Center – Feb. 27, 2024.

Does Boulder County Public Health (BCPH) have the power to demand actions or facilitate questions and answers?
BCPH facilitates community engagement, while regulatory authority over this process resides with CDPHE and the EPA.

Do you plan to use reverse osmosis (for groundwater treatment?)
Xcel Energy's specific water treatment technology has not been finalized. However, Xcel Energy's Assessment of Corrective Measures Report notes that "contaminants at the site can be removed from extracted groundwater using chemical or physical processes" and that "supplemental treatment such as settling before reverse osmosis will be likely."
Source: https://assets.bouldercounty.gov/wp-content/uploads/2024/02/assessment-of-corrective-measures-valmont-station.pdf

These reports (from Xcel) are 600+ pages. Who can help us understand these documents (in other languages)?
BCPH is checking with Xcel and the EPA to see if these technical reports can be summarized and/or translated.

What is the role of other departments, like OSCAR, in this problem. What is BCPH planning to do with health impacts on a lot of people (mental health)? What are we (Boulder County) planning?
BCPH is coordinating with other Boulder County Departments to help share information with the public, increase transparency around the project, and support the community in providing public comment related to the project.

What are the chemical impacts on the human body?
The specific human health impacts related to coal ash exposure vary depending on the composition of the coal ash and an individual's degree of exposure. The US Agency for Toxic Substances and Disease Registry notes that coal ash can contain various human health impacts, such as skin irritation, respiratory irritation, nausea, vomiting, and diarrhea when ingested. Some compounds previously found in coal ash can cause cancer after long-term ingestion or inhalation. BCPH is working to gather more information regarding this specific coal ash. More information can be found here:
Source: https://www.atsdr.cdc.gov/substances/coalAsh.html

Where will the cement processing take place? Off or on-site?
The entire beneficial use project is expected to occur on-site. Xcel has indicated that it intends

to construct the needed infrastructure near the generating station, including an enclosed storage structure and the necessary processing equipment.

What do we know of other coal ash clean-ups in Colorado or other states?
We are not aware of any similar projects taking place in Colorado. We know of projects in Canada and coal ash remediation projects in North America. Staff is connecting with local and state agencies to better understand these projects.

Who is the contractor, and will there be an opportunity for local workforce development to do this work, or will the contractor hire people outside of the state/community?
Xcel Energy has contracted with Charah Solutions Inc. for the coal ash removal and beneficial reuse project. The details about the workforce have not yet been specified.
Source: https://assets.bouldercounty.gov/wp-content/uploads/2024/02/assessment-of-corrective-measures-valmont-station.pdf

How is Boulder County going to prevent dust?
Xcel Energy and its contractors will be responsible for managing dust.
Xcel and their contractors must submit an Engineering Design and Operations Plan to CDPHE to limit and mitigate the occurrence of fugitive dust at project sites. Dust mitigation practices may include the installation of windbreaks or barriers, applying water as a dust suppressant, washing of vehicles, limiting the speed of onsite vehicles, using enclosed spaces and pneumatic systems, and establishing windspeed thresholds for stopping operations. This plan has not been submitted to CDPHE at this time. This plan is anticipated to be submitted, reviewed, and revised, as needed, during the beneficial use determination process. Community members are encouraged to share comments with CDPHE through comment processes.
Source: https://www.epa.gov/system/files/documents/2022-02/fugitive-dust-control-best-practices.pdf

Who will monitor and hold Xcel accountable?
As the project's principal regulators, the Colorado Department of Public Health and Environment (CDPHE) and the Environmental Protection Agency (EPA) will oversee Xcel Energy's operations and monitor compliance with regulations and requirements. As the local public health agency, BCPH can provide support and refer any issues to CDPHE and the EPA for enforcement.

How will wind and other climate events, like flooding, be considered in Xcel's planning?
BCPH has informed Xcel Energy of its concerns regarding climate events, particularly in Boulder County. Xcel has not shared any specific contingency plans currently.

What will happen with the cement and how will we make sure the cement is safe?
Xcel anticipates using the cement in local markets, thus reducing the import of raw materials to Colorado and the metro area.
Source: https://www.epa.gov/sites/default/files/2014-12/documents/ccr_bu_eval.pdf

How will businesses be impacted?
While it is too early to tell how businesses may be impacted, business leaders are encouraged to share their concerns with CDPHE during public comment processes.

Who will pay for the doctors for the air pollution or water pollution impact?
Any such claims would need to be pursued through the civil legal process.

How will the workers be taken care of throughout the project?
Xcel and its contractor, Charah, are subject to applicable workplace safety regulations. Workplace safety concerns can be reported directly to the US Occupational Safety and Health Administration at https://www.osha.gov/workers/file-complaint.

What other Indigenous communities are you communicating with?
BCPH recognizes the cultural significance of the Valmont Butte and has informed local Native American and Indigenous groups of what is planned to take place on this land.

Has there been an archaeological practice? There could be artifacts that are found in the excavation.
The excavation will occur in a landfill previously excavated to create giant cells for disposing of coal ash. The ground surrounding the landfill is not expected to be disturbed.

Does Xcel's plan include a projection of income garnered from the sale of cement materials? If not, can we request that? (Even if it is an estimate.)
BCPH has not received any revenue estimates related to the beneficial reuse project. Based on information received from Xcel, BCPH understands that the income garnered by the sale of the cement product is expected to offset costs associated with the site remediation activities.

What concerns do you have for air quality once the cleanup starts? What has happened at other coal ash sites concerning air quality/pollution?
Suspension of ash and other fine particulates is the primary air quality concern during the beneficial use project. While BCPH has researched other similar projects, little information is available on air quality impacts from this type of project. Staff continues to assess these potential impacts and will provide additional updates as we learn more information.

The information mentions that a "limited number of private owners with wells" are already impacted. How are their needs being met now, related to soil and water quality?
Groundwater monitoring at the Valmont site has shown contamination moving offsite to the northeast. Several adjoining properties have domestic wells. According to the Assessment of Corrective Measures Report submitted by Xcel, 11 privately owned wells were tested in agreement with landowners. The results of the private well sampling did not find exceedances of the established Constituents of Concern. Xcel is continuing groundwater monitoring in this area and is coordinating with private well owners to provide alternative drinking water supplies

as requested.
Source: https://assets.bouldercounty.gov/wp-content/uploads/2024/02/assessment-of-corrective-measures-valmont-station.pdf

What public comment periods should this group be prepared for, particularly with EPA, CDPHE and/or other state agencies?
BCPH expects opportunities for public comment later this year related to different state-level review processes. If additional county review processes occur, public comment may also be provided in those spaces. Boulder County Public Health will notify the public as these opportunities become available.

Can BCPH consult with analogous situations- other coal ash clean-up sites- to ask about their experiences?
Staff is working on this and will provide updates as we learn more.

It was said that the county has some authority over solid waste. What specifically does the county have authority over?
The Colorado Solid Waste Act, C.R.S 30-20-100.5 et seq, (Act) authorizes the Colorado Department of Public Health and Environment (CDPHE) to provide regulatory oversight of the siting, permitting, and regulation of solid waste disposal sites. CRS 30-20-113(3) authorizes local governments (either board of county commissioners or city council) to enjoin violations of the Act within their jurisdiction. State regulations, 6 CCR 1007-2, further encourage CDPHE to coordinate with local governments in carrying out solid waste regulations without conferring additional authority upon local governments.

Where is the beneficial reuse plant going to be located? How can we ensure this will not impact another disproportionately impacted (DI) community?
Although the full design and operations plan for the beneficial reuse project has not yet been submitted, it is BCPH's understanding that Xcel seeks to establish this project on the Valmont property. Specifically, draft site plans have shown the beneficial reuse processing near the former coal-burning power station. BCPH will continue to support community safety measures designed to limit the potential for environmental exposures, especially to neighboring DI communities.

How are impacted Native American groups/tribal nations being addressed, considering the cultural relevance of Valmont Butte?
BCPH recognizes the cultural significance of the Valmont Butte and has informed local Native American and Indigenous groups of what is planned to take place on this land.

What is needed for partners to support air quality monitoring?
BCPH, Colorado State University and CU Boulder are discussing potential community-led air monitoring efforts.

To whom can the public provide comment? Is it part of a special process? Governed by whom?
BCPH expects opportunities for public comment later this year related to different state-level review processes. If additional county review processes occur, the opportunity for public comment may also be provided in those spaces. Boulder County Public Health will notify the public as these opportunities become available. CDPHE otherwise advertises its public comment opportunities here:
https://cdphe.colorado.gov/public- information/planning-and-outreach/air-pollution-control-division-public-comment

What might the impact of pumping groundwater? Will it cause sinkholes? How will the water get returned to the aquifer?
Pumping groundwater is a common practice and does not present an immediate threat to the environment. After groundwater withdrawal, the contaminated groundwater will be treated and released back into the environment, either discharged into a surface water body or reinjected into the ground. Such practices are frequently used in environmental clean-up projects and should not result in sinkholes or other environmental issues.
Source: https://semspub.epa.gov/work/01/6846.pdf

How safe is using coal ash in concrete over the long term?
Environmental Protection Agency (EPA) studies have shown that concrete with a coal ash additive does not increase consumers' environmental or human health risks. A full EPA analysis is available here.
https://www.epa.gov/sites/default/files/2014-12/documents/ccr_bu_eval.pdf

If that concrete is ever disposed of, will it also leech pollutants?
Environmental Protection Agency (EPA) studies have concluded that concrete with a coal ash additive does not increase consumers' environmental or human health risks. The EPA's full analysis is available here.
Source: https://www.epa.gov/sites/default/files/2014-12/documents/ccr_bu_eval.pdf

What is the full monitoring plan? Pre, during, past?
Following requirements established by the Environmental Protection Agency, Xcel Energy implemented an extensive groundwater monitoring network to track and characterize the site's groundwater contamination, beginning in 2017. Xcel will continue regularly monitoring groundwater quality during groundwater remediation at the site. Groundwater monitoring data is published directly to Xcel's website (see link). Regarding potential air quality concerns, Boulder County Public Health is exploring opportunities to establish local air quality monitors.
Source: https://co.my.xcelenergy.com/s/environment/coal-ash-management

If something goes "wrong" during the clean-up, who is responsible?
As the property owner, Xcel Energy is responsible for cleaning the site per applicable laws and environmental regulations.

Need clarity on the roles of CDPHE and EPA and their regulatory and oversight roles.
The Environmental Protection Agency (EPA) establishes technical requirements for the monitoring, closure, and cleanup of coal ash landfills under their Coal Combustion Residuals regulations. These requirements are why Xcel Energy is now undergoing the site remediation project. The EPA oversees compliance with the federal standards for closing the coal ash landfill. The Colorado Department of Public Health and Environment (CDPHE) is the state-level regulatory agency responsible for reviewing project plans to ensure compliance with Colorado's environmental laws. In addition, CDPHE issues permits for certain activities, such as air pollution emissions and water discharge permits. More information about each department can be found using these link: https://www.epa.gov/coalash

Would love the opportunity to talk with/hear from the CSU air quality monitoring team.
The CSU air quality monitoring team can be reached directly at (email). BCPH is aligning efforts with the Climate Justice Collaborative of Boulder County, CSU, and CU Boulder to make community-led air monitoring available.

Why can't they take it to the cement plant near Lyon? So that we don't get the extra pollution here?
CDPHE is responsible for approving all aspects of the plan. Regardless of where the coal ash is processed, the excavation and transport of coal ash at the site has the potential to generate fugitive dust.

What is the beneficial reuse going to take place? Onsite or offsite? Can we at least ensure local companies get contracted for the beneficial reuse project?
The entire beneficial use project is expected to occur onsite. Xcel has indicated that it intends to construct the needed infrastructure near the generating station. Xcel has contracted for the project with Charah Solutions Inc.

Is it possible for BCPH to facilitate a meeting between the community and CDPHE?
CDPHE and Xcel are interested in meeting with community members. BCPH hopes to schedule a community meeting to include CDPHE and Xcel representatives after the project proposals are fully submitted and before the public comment opportunities begin.

Need clarification on potential health impacts- many concerns about community health impacts.
The specific human health impacts related to coal ash exposure vary depending on the composition of the coal ash and an individual's degree of exposure. The US Agency for Toxic Substances and Disease Registry notes that coal ash can contain various human health impacts, such as skin irritation, respiratory irritation, nausea, vomiting, and diarrhea when ingested. Some compounds previously found in coal ash can cause cancer after long-term ingestion or inhalation. Boulder County Public Health is working to gather more information regarding this specific coal ash. More information can be found here: (link)

Source: https://www.atsdr.cdc.gov/substances/coalAsh.html

Details on a dust management plan or air quality monitoring plan, as well as details about particle sizes, monitoring methodology, and access to data.
Xcel Energy has yet to issue a dust management plan. This will be required as part of its air permit application to the State. Xcel has acknowledged that the ash pile for the Beneficial Use Project will be covered and that the pile will only be large enough for one day's processing. BCPH expects that the air permit will require ash piles to be kept damp and operations cease at designated wind speeds. While fence-line monitoring of PM10 and PM2.5 are preferred, it is unclear if they will be required. Any air monitors deployed for particulates will likely utilize a Laser Particle Counter (LPC), which uses a light scattering method to size and count particles and then convert them to a mass fraction. BCPH intends to make data publicly available.

Getting purple air monitors?
Residents may elect to purchase their own air monitors, and low-cost monitors such as Purple Air are adequate to measure particulate matter that may potentially be transported during the Beneficial Use Project. With any air monitor, the device must be properly configured, sited and maintained per the manufacturer's instructions.

Can BoCo summarize previous coal ash remediation and what that post-project monitoring includes/found?
See the one-pager and other documents in the Contextual Research folder. I can expand this to cover plants outside of the US Rockies to Charah's project in Canada and the Eastern US. - SG

Directional wind analysis to know which communities will be affected?
Extensive historical records of wind direction and speed in Boulder County show the potential for wind speeds capable of transporting particulate matter in all directions. However, higher wind speeds are predominantly associated with winds from the west to the east. Air particles from the Valmont Power Plant have the potential to impact all communities surrounding the plant.