



JOHNNY PENROD
Sr. Director Generation
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Manager

Cholla Power Plant
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June 30, 2025

Transmitted Electronically

Mr. Barry Breen
Principal Deputy Assistant Administrator
US Environmental Protection Agency
1200 Pennsylvania Ave, NW
Mail Code: 5101T
Washington, DC 20460

**Subject: REQUEST TO WITHDRAW THE PART A F(2) DEMONSTRATION FOR
THE CHOLLA POWER PLANT FLY ASH POND AND BOTTOM ASH POND
Navajo County, Arizona**

Dear Mr. Breen:

On November 30, 2020, Arizona Public Service Company (APS) submitted a complete demonstration to the U.S. Environmental Protection Agency (EPA) that requested approval of a site-specific alternative deadline to cease receipt of waste and initiate closure pursuant to 40 C.F.R. § 257.103(f)(2) for its Bottom Ash Pond (BAP) and Fly Ash Pond (FAP) located at the Cholla Power Plant in Navajo County, Arizona. In that submittal, APS requested an alternative deadline of June 30, 2025, to continue to receive coal combustion residuals (CCR) and non-CCR waste streams at the BAP and FAP. On January 11, 2022, EPA informed APS that the demonstration was complete and that the April 11, 2021 deadline to cease receipt of waste was tolled pending a final decision on the application. A final decision on the application remains pending.

APS has permanently ceased receipt of CCR and non-CCR waste streams at the BAP and FAP and has initiated closure of these units as of June 30, 2025. Thus, APS requests withdrawal of its November 30, 2020 demonstration as it is no longer necessary for EPA to issue a further extension of the April 11, 2021 deadline to cease receipt of waste at the BAP and FAP.

If you have any questions or concerns regarding this request, please contact Natalie Chrisman Lazarr at 602.316.1324 or via email at natalie.chrismanlazarr@aps.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Johnny Penrod', is written over a horizontal line.

Johnny Penrod
Sr. Director Generation Operations/Acting Plant Manager – Cholla Power Plant
Arizona Public Service Company

Cc: Steven Cook, Deputy Assistant Administrator – EPA/OLEM