July 14, 2025

Arizona Public Service Company
400 N. 5th Street
Phoenix, Arizona 85004

Subject: Semiannual Report Documenting Progress In Remedy Selection
Fly Ash Pond And Bottom Ash Pond
Cholla Power Plant – Navajo County, Arizona

In accordance with 40 Code of Federal Regulations (CFR) Section (§) 257.97(a) of the Coal Combustion Residuals (CCR) Rule, this Semiannual Remedy Selection Progress Report (Semiannual Report) has been prepared on behalf of Arizona Public Service Company (APS) to document progress in selection of remedies for CCR units which have been identified as potentially impacting groundwater at the APS Cholla Power Plant, located in Navajo County, Arizona (the Site). The identified applicable site CCR units include the Fly Ash Pond (FAP) and the Bottom Ash Pond (BAP). Semiannual progress reporting to support remedy selection began on July 15, 2019. The most recent update was provided in the *Annual Groundwater Monitoring and Corrective Action Report (GMCAR) for 2024*, dated January 31, 2025. This Semiannual Report documents activities completed to date in 2025.

## SUMMARY OF ACTIVITIES COMPLETED IN 2025

Activities completed by APS in the first half of 2025 in support of remedy selection for the FAP and the BAP include the following:

- *Continued Assessment Monitoring at the BAP and FAP* – While corrective action evaluation progresses, assessment monitoring (including analysis of collected samples for Appendix III and Appendix IV constituents) has continued on a semi-annual basis at the BAP and FAP per 40 CFR §257.95(b) and (d)(1).
- *Interim Response Measures at the FAP and BAP*. In tandem with operation of existing seepage collection systems at the FAP and BAP, interim response measures including construction of improvements to make the BAP Seepage Collection Systems operate more effectively were completed in early 2025 to limit the groundwater impacts from the BAP while remedies are being evaluated and selected.
- *Performance Monitoring of Active Systems* – Average flow rates continue to be monitored for each active seepage extraction system at the FAP and BAP. Additionally, water quality samples are collected and analyzed so that the total removed mass of Appendix IV constituents (minus radionuclides) can be calculated for the active seepage extraction systems at the FAP and BAP during the 2025 reporting year. These data will be included in the 2025 GMCAR.
- *Evaluation of FAP Dewatering Strategies and Connection to Downgradient Groundwater*. A pilot-test field program to evaluate the extent and removal of drainable pore water upgradient of the FAP dam has been ongoing since May 2023. Three phases of well installation programs have been i completed in the ash to the alluvium

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underlying the FAP with testing performed. These dewatering wells are currently being operated and assessed to support unit closure.

— *Seepage Collection System Discharge to Evaporation Pond.* To support shutdown of coal-fired power production at the Cholla Power Plant, BAP and FAP seepage extraction system flows were redirected using existing piping to discharge to the new Evaporation Pond.

— *Remedy Selection Reports for the FAP and the BAP.* Preparation of a remedy selection report continued through the beginning of 2025 to document how the selected remedy will meet the requirements of 40 CFR §257.97(b).

## FUTURE PLANNED ACTIVITIES

APS plans to perform the following activities in support of remedy selection during the second half of 2025 (and in upcoming years, as noted):

— *Continued Operations of Existing FAP and BAP Seepage Collection Systems*. The seepage systems at both the FAP and BAP will continue to serve as part of interim response measures at both CCR units until remedial activities begin. The updated seepage collection systems at both units will also likely be a part of final selected remedies.

— *BAP In-Situ Remedy Pilot Study.* Based on recommendations put forth in the bench-scale evaluation, a pilot-scale study of in-situ strategies for cobalt remediation may be conducted at the BAP. The pilot-scale study would implement testing of groundwater oxidation amendments at near select wells. Implementation and assessment of the pilot-scale study will be evaluated during 2026 and would likely be part of initial remedial activities for adaptive remedy options in future years.

— *Remedy Selection* – APS will select remedies for the FAP and the BAP that meet the requirements of 40 CFR §257.97(b). Additionally, a remedy selection report will be prepared per 40 CFR §257.97(a).

— *Initiation of Remedial Activities* – Per 40 CFR §257.91(f), APS will begin remedial activities at the FAP and the BAP within 90 days of selecting a remedy for each unit.

Respectfully submitted,

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