FOUR CORNERS POWER PLANT POST-CLOSURE PLAN §257.104(d) BOTTOM ASH POND CH_PostClosPlan_003_20161017

Post-Closure Plan Contents §257.104(d)(1)

The owner or operator of a CCR unit must prepare a written post-closure plan that includes, at a minimum, the information specified in paragraphs (d)(1)(i) through (iii) of this section.

Site Name / Address Cholla Power Plant / 4801 I-40 Frontage Road, Joseph City, AZ 86032 Owner Name / Address Arizona Public Service / 400 North 5 th Street, Phoenix, AZ 85004 CCR Unit Bottom Ash Pond Location 34° 57′ 18″ N, 110° 17′ 19″ W Reason for Initiating Closure Permanent cessation of a coal-fired boiler(s) by a date certain Final Cover Type Closure Method Closure Method Closure by leaving CCR in place CLOSURE PLAN DESCRIPTION (d)(1)(i) — A description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed. The Bottom Ash Pond will be dewatered to facilitate construction of a final cover system for leaving the coal combustion residuals (CCR) in place. The final cover will be constructed over a graded and prepared CCR subgrade. The Bottom Ash Pond will be re-graded from south or southwest to northeast to provide a slope to promote storm water drainage off the closed pond. The storm water runoff will be discharged to a detention basin. The existing side slopes of the Bottom Ash Dam will continue to drain direct precipitation away from CCR unit. The outside slopes and top slope of the closed configuration of the Bottom Ash Pond will be monitored for non-native invasive vegetation, settlement, and/or excessive erosion. Excessive settlement is defined as being present where standing water is in excess of 1 foot in depth over	SITE INFORMATION	
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defined as an erosion rill or scour greater than 1 foot in depth.

The maintenance activities associated with impacted areas are as follows:

- Invasive Vegetation

- When invasive vegetation is observed during routine monitoring, it will be removed from the capped surface.
- b) If a void is created in the cap materials from vegetation removal, the void will be filled with erosion layer soil resources in accordance with the original construction specifications.

- Settlement

- a) The limits of the settlement area will be delineated.
- b) The delineated area will be filled to the final elevation with erosion layer soil resources in accordance with the original construction Specifications.
 Reestablishment of vegetative cover is expected to occur by natural processes.
- Erosion Rills (deeper than 1 foot of erosion on a slope)
 - a) The erosion rill will be excavated with a backhoe or track hoe to form a uniform trench width.
 - b) The trench will be filled up to the final elevation with erosion layer soil resources in accordance with the original construction Specifications.
 - c) The repaired erosion rill area will be monitored for recurrence of rills. If rills reappear, then the site will be assessed for additional measures of erosion resistance.
- Erosion Scour (deeper than 1 foot of erosion along the bottom of a channel)
 - a) The limits of the erosion scour area will be delineated.

- b) The delineated area will be filled up to the final elevation with erosion layer soil resources in accordance with the original construction Specifications.
- c) Based on the cause of the erosion scour, riprap armoring may be deployed over the area to prevent recurring scouring of the cap materials.

The drainage collection channel will be monitored for excessive erosion and sediment build-up. Within the riprap-lined portion of the channel, excessive erosion is defined as displaced riprap with exposed underlying geotextile. Within the soil cement-lined portion of the channel, excessive erosion is not anticipated. However, excessive erosion is defined as broken soil cement with exposed soil subgrade.

The maintenance activities associated with the Drainage Channel are as follows:

- Erosion Within the Riprap-Lined Portions of Channel, if applicable (exposed geotextile)
 - a) The exposed filter materials (graded filter or geotextile) will be inspected for damage, with damaged materials being repaired in accordance with the Specifications.
 - The riprap materials will be replaced in accordance with the original construction Specifications.
 - c) If it is determined that the erosion is due to side channel inflow, an inspection will be performed by Engineering Personnel to determine the corrective action, which may include one of the following:
 - Regrading adjacent to the channel to prevent the side channel inflow.
 - ii. Addition of a controlled side channel inflow (e.g. a scupper or

energy dissipation feature). - Erosion Within the Soil Cement-Lined Channel, if applicable (deeper than 6 inches) The limits of the erosion rill will be a) delineated. b) The edges and bottom of the rill will be clean cut/chip to create vertical edges and flat bottom over the delineated area. The prepared area will be filled with a c) cementitious material (i.e. grout or concrete) with a minimum 7-day strength of 1,100 pounds per square inch (psi). Cementitious materials shall be constructed in accordance with the original construction Specifications. - Sediment Build-up If excessive sediment buildup is observed (blockage of 1/3 of the channel cross-section), the sediment will be removed from the channel. b) If the sediment build-up is caused by a side channel flow, an additional sediment trap consisting of a riprap apron may be constructed at the discretion of APS. In accordance with §257.104(d)(2)(iii), this initial written closure plan will be amended to provide additional details after the final engineering design for the grading and cover system is completed. The initial version of the closure plan reflects the information and planning available at the time of issuance. (d)(1)(ii) – The name, address, telephone number, **Neal Brown** and email address of the person or office to Arizona Public Service 400 North 5th Street contact about the facility during the post-closure Phoenix, AZ 85004 care period. (602) 250-1000 (d)(1)(iii) – A description of the planned uses of the Currently, APS does not intend to utilize the closed

property during the post-closure period. Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring systems unless necessary to comply with the requirements in this subpart. Any other disturbance is allowed if the owner or operator of the CCR unit demonstrates that disturbance of the final cover, liner, or other component of the containment system, including any removal of CCR, will not increase the potential threat to human health or the environment. The demonstration must be certified by a qualified professional engineer, and notification shall be provided to the State Director that the demonstration has been placed in the operating record and on the owners or operator's publicly accessible internet site.

Bottom Ash Pond for any purpose during the postclosure period. APS may install a fence around the perimeter of the CCR Unit to prevent unauthorized access and/or disturbance of the side and top slopes, impounded areas, and drainage features. Access will only be granted for inspections, maintenance, and repairs.

POST-CLOSURE SCHEDULE

APS will conduct post-closure care for 30 years after completion of construction activities.

For the first 5 years, APS will perform the monitoring activities described in this report on a quarterly basis. Additionally, APS will monitor for storm water related damage after significant storm events. After the first 5 years and throughout the remaining 25 years, APS will perform the monitoring activities described in this report on an annual basis and after significant storm events.

Certification Statement 40 CFR § 257.104(d)(4) – Post-Closure Plan for CCR Surface Impoundment

CCR Unit: Arizona Public Service; Cholla Power Plant; Bottom Ash Pond

I, Alexander W. Gourlay, being a Registered Professional Engineer in good standing in the State of Arizona, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the information contained in the initial post-closure plan dated October 17, 2016 meets the requirements of 40 CFR § 257.104.

Alexander W. Gourlay, P.E.
Printed Name
August 26, 2016
August 26, 2016
Date

