

CHOLLA POWER PLANT BOTTOM ASH POND – CCR Post-Closure Plan

Amendment 1

AECOM Project No. 60708570

October 6, 2025

Prepared for:

Arizona Public Service
400 North 5th Street
Phoenix, AZ 85004

Prepared by:

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**CHOLLA POWER PLANT
POST-CLOSURE PLAN §257.104(d)
BOTTOM ASH POND
Amendment 1 (October 6, 2025)**

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

Content of the plan. The owner or operator of a coal combustion residual (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.

Prepared for Arizona Public Service (APS) by AECOM Technical Services, Inc. (AECOM)	
CLOSURE PLAN AMENDMENT HISTORY	
Initial	August 26, 2016
Amendment 1	October 2025 – Amended to reflect changed closure method for the Bottom Ash Pond (BAP) from “Closure in Place” to “Closure by Removal” with completion of CCR removal and decontamination activities during the active life and post-closure care period of the CCR unit, per §257.102(c)(2) and adjusted content to comply with changes to the CCR Rule introduced by the United States Environmental Protection Agency’s (USEPA’s) “Legacy Coal Combustion Residuals Surface Impoundments and CCR Management Units” rulemaking.
SITE INFORMATION	
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	Final receipt of CCR
Closure Method	Closure by Removal

POST-CLOSURE PLAN DESCRIPTION	
§257.104(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;	Responses for the three specific requirements of paragraph (b) of this section (§257.104(b)(1), (2), and (3)) are provided in following sections.
§257.104(b)(1) – Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover, as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover;	Not applicable. There will be no final cover system because the CCR within the BAP will have been removed during the closure period of the active life of the unit.
§257.104(b)(2) – If the CCR unit is subject to the design criteria under § 257.70, maintaining the integrity and effectiveness of the leachate collection and removal system and operating the leachate collection and removal system in accordance with the requirements of §257.70; and	Not applicable. The BAP is not, and has not been a landfill; and therefore, has no leachate collection and removal system and is not subject to §257.70.
§257.104(b)(3) – Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §§257.90 through 257.98.	<p>Applicable. APS has identified groundwater impacts downgradient of the BAP and completed an Assessment of Corrective Measures (Wood, 2019) for the unit. APS is currently in the process of selecting a remedy for identified groundwater impacts and intends to complete groundwater Corrective Action in the post-closure care period pursuant to §257.102(c)(2).</p> <p>Throughout groundwater Corrective Action, the certified Groundwater Monitoring System (WSP, 2023) for the BAP will continue to be maintained and monitored on a semiannual basis in accordance with the requirements of §257.95 (Assessment Monitoring Program), as well as any additional requirements defined in a forthcoming Corrective Action Groundwater Monitoring Program developed pursuant to §257.98(a)(1).</p>

§257.104(d)(1)(ii) – The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period; and	<u>Neal Brown</u> <u>Arizona Public Service</u> <u>400 North 5th Street Phoenix, AZ 85004</u> <u>(602) 250-1000</u>
§257.104(d)(1)(iii) – A description of the planned uses of the 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.	Applicable. After CCR has been removed from the BAP in accordance with the Closure Plan during the closure period, APS will breach the BAP earthen dam pursuant to the requirements of Arizona Department of Water Resources (ADWR). The remnants of the breached dam (earth mounds) will remain and no longer be under the jurisdiction of ADWR. APS will maintain the surface water control systems constructed during closure to control sediment load and discharge flows from the site in accordance with local regulations. APS may periodically maintain these systems by excavating and stockpiling accumulated sediment to retain functionality. If any visually identifiable CCR is encountered after BAP closure, it will be removed for disposal in the Bottom Ash Monofill (BAM), if still operational, or hauled to an appropriately licensed off-site disposal facility. APS owns and plans to fence the land to prevent unauthorized access while completing groundwater Corrective Action, and while vegetation and other natural systems become reestablished.
CLOSURE SCHEDULE	
Initial Written Post-Closure Plan Completed	August 2016
Post-Closure Plan Amendment 1	October 2025
Date of Final Receipt of CCR	June 30, 2025
Closure Activities Initiated	June 30, 2025
Initiate Post-Closure Care Period	Prior to June 30, 2030
Complete Groundwater Corrective Action	During Post-Closure Care Period

REFERENCES
Wood, 2019. Assessment of Corrective Measures for the Fly Ash Pond and the Bottom Ash Pond. Arizona Public Service Cholla Power Plant – Navajo County, Arizona. June 4, 2019.
WSP, 2023. Groundwater Monitoring System Certification Report. Coal Combustion Residuals Rule Groundwater Monitoring System Compliance. January 30, 2023.

Attachment:

- Certification Statement 40 CFR § 257.102(b)(4) – Amended Post-Closure Plan for a CCR Surface Impoundment, dated October 6, 2025.

Attachment

Certification Statement 40 CFR § 257.104(d)(4) – Amended Post-Closure Plan for a 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 amended post-closure plan dated October 6, 2025, meets the requirements of 40 CFR § 257.104.

Alexander W. Gourlay, P.E.
Printed Name

October 6, 2025
Date



