



JOHNNY PENROD
Plant Manager

Cholla Power Plant
P.O. Box 188
Joseph City, AZ 86032
Tel **602 250 4609**

May 17, 2025

Bureau of Land Management
Attn: Ms. Sharisse Flatt
Field Manager – Safford Office
711 14th Avenue
Safford, Arizona 85546

Dear Ms. Flatt:

As you are no doubt aware, real property you manage is located adjacent to the Cholla Power Plant, in particular the Bottom Ash Pond disposal area used by Arizona Public Service Company (APS) to manage coal combustion residuals ("CCR") generated by the plant. The federal CCR Rule 40 C.F.R. Sec 257.95(g)(2) requires that APS notify the owners of neighboring property where we have identified levels of constituents commonly associated with CCR in groundwater that are in excess of federal CCR groundwater protection standards. An initial notification identifying elevated levels of cobalt and lithium was sent to the Bureau of Land Management in February 2020. This notification serves to update the list of CCR constituents present at elevated levels to now include combined radium-226 and radium-228.

Based on the results of groundwater quality sampling performed on BLM property near the Cholla Bottom Ash Pond, we believe that groundwater containing combined radium-226 and radium-228 in excess of federal groundwater protection standards is present. At this time, we believe the extent of impacted groundwater is limited and that these conditions do not pose a threat to human health or the environment. The elevated concentrations of combined radium-226 and radium-228 in groundwater are located in an alluvial aquifer that is not used for drinking water. Nonetheless, out of an abundance of caution and to comply with federal CCR management regulations, we are currently assessing next steps in the characterization of these impacts.

With respect to formerly identified CCR constituents associated with the Bottom Ash Pond, we have assessed various corrective measures that could be used to remediate groundwater containing CCR constituents associated with the pond. In July 2019, a written report detailing this assessment was published on the APS website, aps.com. On August 17, 2022, APS held public meetings to discuss the assessment of corrective measures. A remedy selection report is currently being prepared to document how the selected remedy will meet the CCR Rule requirements. While the remedy selection progresses, groundwater monitoring continues to be conducted on a semi-annual basis with results presented in an annual Groundwater Monitoring and Corrective Action Report posted on the APS website. Please reach out to us if you have any questions or comments about these conditions.

Regards,

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

Johnny Penrod
Plant Manager - Cholla Power Plant