POST-CLOSURE PLAN ASH LANDFILL AREA SPRINGERVILLE GENERATING STATION SPRINGERVILLE, ARIZONA

Prepared for

Tucson Electric Power Company

October 14, 2016

Prepared by

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Project No. 1062.07



Post-Closure Plan Ash Landfill Area Springerville Generating Station Springerville, Arizona

I certify that the material and data in this Post-Closure Plan were prepared under the supervision and direction of the undersigned and meets the requirements of CFR §257.104.

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Expises, 3/31/2018



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1 INTRODUCTION

AMTECH Associates L.L.C. (AMTECH) has prepared this post-closure plan for the Ash Landfill area associated with the Springerville Generating Station (SGS) operated by Tucson Electric Power Company (TEP). This plan was prepared to comply with the post-closure plan requirements as per the U.S. Environmental Protection Agency's Standards for the Disposal of Coal Combustion Residuals (CCR) in Landfill and Surface Impoundments, CFR Part 257 Subpart D. These standards are applicable to the facility's Ash Landfill as an "Existing CCR landfill" as defined in CFR §257.53.

As part of the post-closure care plan, AMTECH has outlined the procedures to be taken in order to perform post-closure activities at the Ash Landfill as stipulated for existing CCR landfills in accordance with CFR §257.104. Additionally, in accordance with §257.104(d)(1)(iii), this plan will be placed in the SGS's facility operating record pursuant to the requirement stipulated in §257.105(i)(4).

1.1 Regulatory Requirements

As per CFR Part §257.104, a written post-closure plan must be prepared for a CCR landfill, or any lateral expansion of a CCR unit. Information specified to be included in the post-closure plan by this section is further described in Section 2 of this document.

1.1.1 Site Description and Location

The SGS is a four-unit, pulverized coal-fired, steam electric generating facility, operated by TEP, which began operations in 1985 and consists of a combined net generating output of approximately 1600-megawatts.

SGS is located approximately 15 miles northeast of Springerville, in Apache County, Arizona. The power plant area of SGS is located in Sections 27, 28, 33, and 34, of Township 11 North, Range 30 East of the Salt and Gila River Baseline and Meridian. The SGS site occupies 14,355 acres, which includes the power plant area, ash landfill area and the east and west well fields.

The Ash Landfill, located southwest of the power plant area, is primarily used for the disposal of fly and bottom ash, products of the coal-fired units at the plant. A delineated portion of the Ash Landfill is used for the disposal of other items in lesser quantities, i.e. reactivator sludge, construction debris and power plant outage refuse, sump sludges, demineralizer resins, PCS, cooling tower sludge, lime, soda ash, sewage pond sludge, evaporation pond solids, miscellaneous pond clean-outs, cooling tower treated lumber, and other inert and non-hazardous materials.



1.2 Regulatory Documents and Other Information §257.84(b)(i)

The ADEQ issued APP permit No. P-101448 for the SGS (last modified on June 15, 2016), which authorizes the operation and closure of existing discharging facilities, including the Ash Landfill as well as post closure plans.

As provided in 257.104(d)(3), this closure plan will be amended as needed based on site-specific and local regulatory mandates; the modified plan will replace this post-closure plan to satisfy the requirements of the CCR Rule.



2 POST-CLOSURE PLAN

At a minimum, this Post-Closure Plan will include the following, pursuant to CFR Part §257.104(d):

- A description of the monitoring and maintenance activities;
- The name, address, telephone number, and email address of the facility contact during postclosure care; and
- A description of the planned uses of the property during the post-closure period.

2.1 Monitoring and Maintenance Activities §257.104 (d)(i)

The following post-closure care procedures shall be performed for the post-closure care of the Ash Landfill facility:

- Maintain the integrity and effectiveness of the final cover system including repair (as necessary) the final soil cover system 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. §257.104 (b)(1).
- As the existing Ash Landfill is not and will not be subject to the liner and leachate system requirements, §257.104 (b)(2) is not applicable.
- Maintain the monitoring system and monitoring the groundwater in accordance with \$257.104 (b)(3).
- Perform post-closure care procedures for a minimum of 30 years following the completion of the closure activities. §257.104 (c).
- If at the end of 30 years the facility is under "assessment monitoring" continue post-closure care until such time as the facility returns to "detection monitoring." §257.104 (c)(2).

2.2 Facility Contact Information §257.104 (d)(ii)

Facility contact name: Amy Pulsifer

Mailing Address: PO Box 2222, Springerville, Arizona 85938

Telephone number: (928) 337-7429



Email address: APulsifier@TEP.com

2.3 Planned Property Uses During Post-Closure §257.104 (d)(iii)

Currently, there is no proposed use of the property during the post-closure period.

2.4 Recordkeeping, Notification, and Posting §257.105-107

In accordance with §257.105 (a), files will be maintained (relevant to the post-closure plan) as required by this section in the facility operating record.

In accordance with §257.105 (b), these records will be retained for a minimum of five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or study.

In accordance with §257.105 (i), the following documents will be placed in the facility's operating record, (§257.105 (i)(12) through §257.105 (i)(13)):

- Written post-closure plan and any subsequent amendments. §257.105 (i)(12).
- Notification of post-closure completion. §257.105 (i)(13).

TEP will provide notification of the availability of the Closure Plan to the relevant State Director and/or Tribal authority before the close of business on the day the notification is required to be completed. §257.106.

TEP will place the Closure Plan on TEP's CCR Web site in accordance with §257.107.

