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NEW APPLICATION

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ARIZONA CORPORATION COMMISSION  
DOCUMENT CONTROL

September 22, 2003

Arizona Corporation Commission

DOCKETED

SEP 23 2003

VIA HAND-DELIVERY

Don Thompson  
Railroad Safety Section  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

E-01773A-03-0697

DOCKETED BY 

Re: Arizona Electric Power Cooperative's ("AEPSCO") Request for Waiver  
of Certain Clearance Standards Pursuant to A.A.C. R14-5-110.E

Dear Mr. Thompson:

Pursuant to A.A.C. R14-5-110.E, the purpose of this letter is to request exemption from or waiver of certain clearance standards set forth in R14-5-110.B at a rail spur and an associated coal unloading facility which are owned by AEPSCO at its Apache Generating Station near Cochise, Arizona. Barry Brown of AEPSCO's engineering staff has discussed these issues with you previously. Specifically, AEPSCO requests an exemption or waiver approving the clearances at the facility as set forth in the four sheets of design drawings identified as 374-101 which are attached to this correspondence.

As background, AEPSCO owns and operates the Apache Generating Station and is in the process of making certain modifications at the Station including the installation of new coal blending facilities. The Commission is familiar with these improvements and approved the financing for them in Decision No. 65210 dated September 20, 2002. AEPSCO also owns a rail spur and coal unloading facilities which the Union Pacific Railroad uses to deliver coal to the Station under an Industrial Track Agreement between the two parties.

In addition to these improvements at Apache Station, AEPSCO must also meet new environmental regulations that take effect on January 1, 2006. They require a major reduction (50%) in opacity standards at such rail track coal unloading facilities. AEPSCO's engineers have determined that the only viable way at the existing facility to reduce the emissions to meet these new standards is installation of dual dust walls. The seal associated with the walls will significantly reduce the effect of wind on the unloading operation and will make more effective the use of dry fog type dust suppression at the railcar coal discharge points. The installation of the walls, however, will reduce somewhat the clearances from the centerline of the track and that is the reason for this request for waiver.

Letter to Don Thompson  
September 22, 2003  
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Granting the waiver will not impact safety considerations at the facility. Apache Generating Station, of course, is not open to the public and access is restricted to Station personnel. Workers are trained in appropriate procedures. Minimum clearance signage will be posted.

As you requested in your conversations with Mr. Brown, to assist in your review enclosed are eight sets of the preliminary design drawings for the dual dust wall. The first four in each set are from the dust suppression vendor. The fifth is from the structural engineering consultant showing how the west dust wall will anchor to the existing grillage. The final two drawings illustrate the current structure and the hot rail supports to which the east dust wall will attach.

As required by the Industrial Track Agreement, AEPCO has notified the Union Pacific of these proposed changes in the clearance standards and has provided the railroad structural design drawings as well. Based on AEPCO's discussions with the railroad, we don't believe it has any objections to this request. We are also copying Mr. Freddie Chueng, the Manager of Industrial & Public Projects for the railroad's engineering department, on this request.

AEPCO would appreciate approval of this request as soon as possible and no later than early November, 2003. A contractor is already on site performing the Station improvements mentioned previously and it is most efficient to integrate these modifications with that work. Potential change orders are pending and shop fabrication needs to begin promptly.

AEPCO appreciates your attention to this matter. If you have any questions concerning it or you need additional information, please contact Barry Brown at (520) 586-5214 or me.

Very truly yours,

GALLAGHER & KENNEDY, P.A.



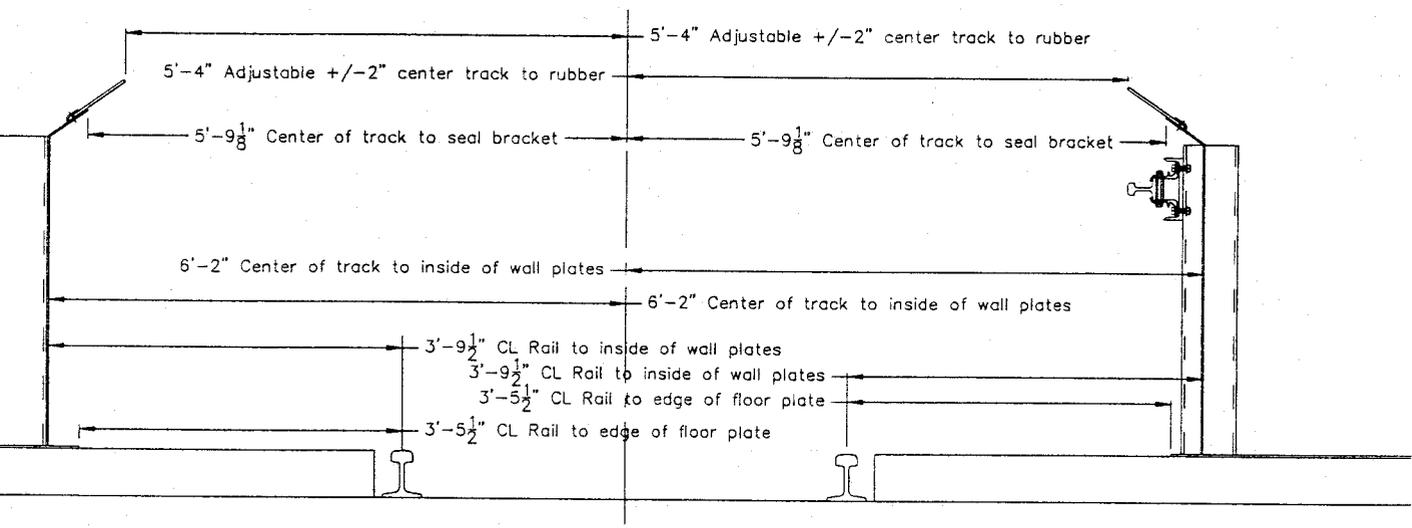
By:

Michael M. Grant

MMG:bo  
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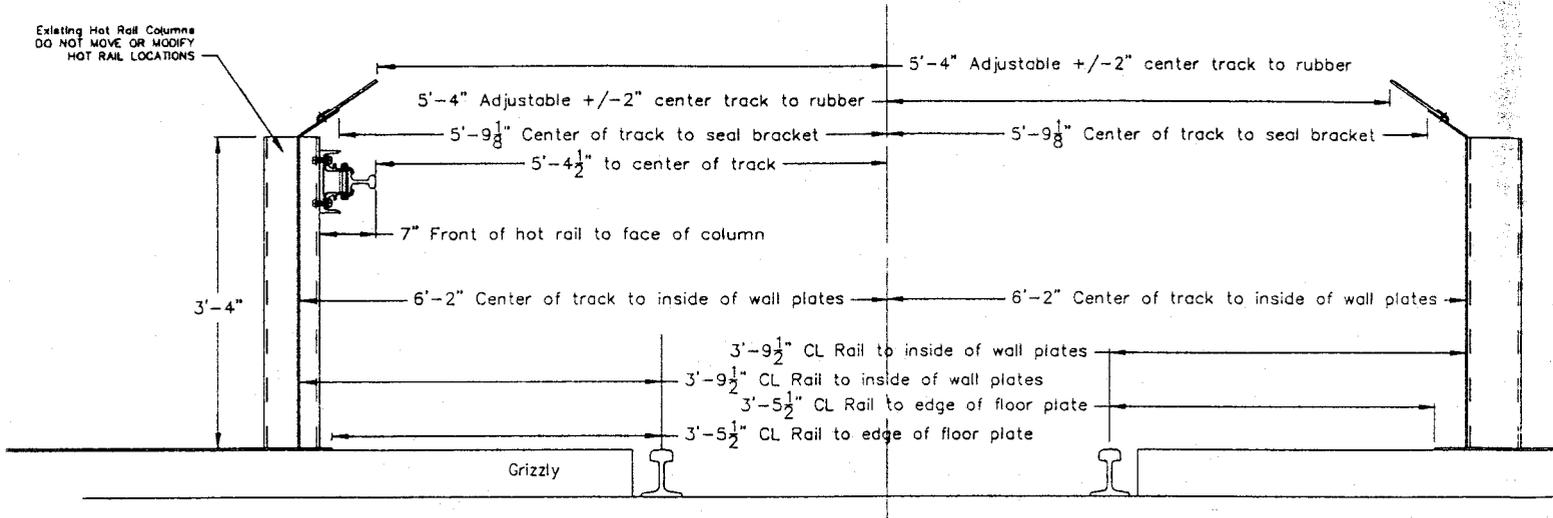
Freddie Chueng (regular mail)  
Barry Brown (regular mail)  
Patricia Cooper (regular mail)



VIEW LOOKING NORTH FROM SOUTH END OF  
DUMP HOPPERS  
LOCATION OF NEW DUST CONTAINMENT WALL  
SUPPORT COLUMNS, PLATES, AND DUST SEALS

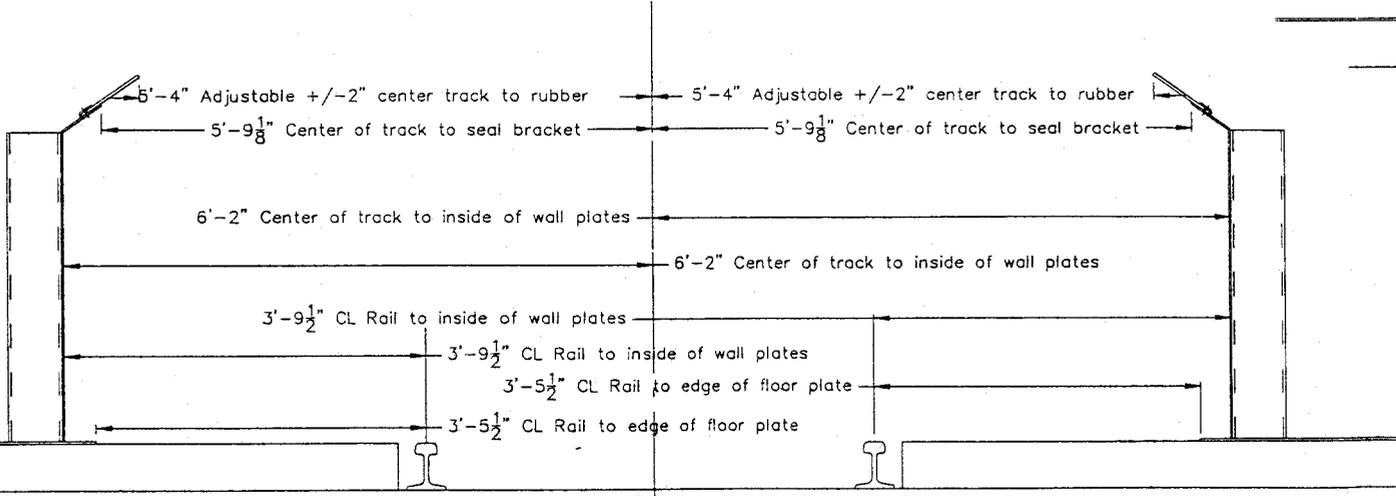
VIEW LOOKING NORTH FROM SOUTH END OF DUMP  
HOPPERS  
EXISTING HOT RAIL SUPPORT COLUMN #9 WITH LOCATION  
OF NEW DUST CONTAINMENT WALL AND SEAL  
MATCHING ORIGINAL DUST WALL STILL EXISTING BETWEEN  
COLUMNS 1. AND 2.

DESCRIPTION	DATE	BY	TOLERANCES	TRC The Raring Corporation		CUSTOMER :		
			UNLESS OTHERWISE SPECIFIED	Tel (360) 892 1659 Fax (360) 892 1624 www.raringcorp.com 12117 NE 99th St, Suite 1920, Vancouver, WA 98682		Dearborn Midwest Conveyor		
			DECIMAL: 1 PL ±.015 (.38mm)			DRAWN : dr	7/31/03	CONTRACT NO :
			2 PL ±.010 (.25mm)			CHECK :		374
			3 PL ±.005 (.13mm)	TITLE :		DWG NO :	REV	
			FRACTIONAL: ±1/64	ADS Dust Control Systems-		374-101	0	
			ANGULAR: ±1/2"	Rail Dump Dust Walls		SCALE : N/A	SHEET 2 OF 5	
			SURFACE FINISH: 125 ✓	End View Cuts				



VIEW LOOKING SOUTH FROM NORTH END OF DUMP HOPPERS  
EXISTING HOT RAIL SUPPORT COLUMNS WITH LOCATION OF NEW DUST CONTAINMENT WALL AND SEAL MATCHING ORIGINAL DUST WALL STILL EXISTING BETWEEN COLUMNS 1 AND 2.

VIEW LOOKING SOUTH FROM NORTH END OF DUMP HOPPERS  
LOCATION OF NEW DUST CONTAINMENT WALL SUPPORT COLUMNS, PLATES, AND DUST SEALS



VIEW LOOKING NORTH FROM SOUTH END OF DUMP HOPPERS  
LOCATION OF NEW DUST CONTAINMENT WALL SUPPORT COLUMNS, PLATES, AND DUST SEALS

VIEW LOOKING NORTH FROM SOUTH END OF DUMP HOPPERS BETWEEN EXISTING HOT RAIL COLUMNS 8 AND 7  
NEW COLUMNS AND DUST WALL

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