

# FOUR CORNERS POWER PLANT COMBINED WASTE TREATMENT POND (CWTP) – CCR Closure Plan

Amendment 1

AECOM Project No. 60662374

April 13, 2026

Four Corners Power Plant  
Combined Waste Treatment Pond – CCR Closure Plan

Prepared for:

Arizona Public Service  
400 North 5<sup>th</sup> Street  
Phoenix, AZ 85004

Prepared by:

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**FOUR CORNERS POWER PLANT  
 CLOSURE PLAN §257.102(b)  
 COMBINED WASTE TREATMENT POND (CWTP)  
 Amendment 1 (April 2026)**

**Closure Plan Contents §257.102(b)(1)**

*The owner or operator of a Coal Combustion Residual (CCR) unit must prepare a written closure plan that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit consistent with recognized and generally accepted good engineering practices. The written closure plan must include, at a minimum, the information specified in paragraphs (b)(1)(i) through (vi) of this section.*

<b>Prepared for Arizona Public Service (APS) by AECOM Technical Services, Inc. (AECOM)</b>	
<b>CLOSURE PLAN AMENDMENT HISTORY</b>	
Initial	August 30, 2016
Amendment 1	April 13, 2026 – <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. Adjusted description of closure from “clean closure” to “closure by removal”.</li> <li>3. Removed reference to the CWTP being re-purposed as a “Low Volume Waste Water Pond” because APS no longer plans to discharge low volume waste water to the pond.</li> <li>4. Changed statement that the hydraulic dredging activities would not utilize a cutterhead because portions of the CCR deposits within the pond were sufficiently cemented to benefit from use of a cutterhead for removal.</li> <li>5. Changed reference to required depth of removal from “to a level assessed to be equivalent to original ground” to “to bottom of impounded CCR”.</li> <li>6. Updated dates reported for final receipt of CCR, initiation of closure, and completion of CCR removal.</li> </ol>

<b>SITE INFORMATION</b>	
Site Name / Address	Four Corners Power Plant / 691 CR-6100, Fruitland, NM 85416
Owner Name / Address	Arizona Public Service / 400 North 5 <sup>th</sup> Street, Phoenix, AZ 85004
CCR Unit	Combined Waste Treatment Pond (CWTP)
Location	36° 41' 30" N, 108° 28' 28.22" W
Reason for Initiating Closure	Final receipt of CCR
Final Cover Type	Not applicable –Closure by Removal
Closure Method	Closure by Removal
<b>CLOSURE PLAN DESCRIPTION</b>	
§257.102(b) <i>Written closure plan</i> —	
(1) <b>Content of the plan.</b> The owner or operator of a CCR unit must prepare a written closure plan that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit consistent with recognized and generally accepted good engineering practices. The written closure plan must include, at a minimum, the information specified in paragraphs (b)(1)(i) through (vi) of this section.	
§257.102(b)(1)(i) – A narrative description of how the CCR unit will be closed in accordance with this section.	<p>The Combined Waste Treatment Pond (CWTP) is an existing 13-acre detention pond located adjacent to Morgan Lake. The pond was used as a settling basin for ash-impacted wastewater prior to discharge to Morgan Lake through a monitored National Pollutant Discharge Elimination System (NPDES) Internal Outfall 01E permitted discharge point.</p> <p>Figure 1 is a Plan View of the CWTP that identifies the key features of the pond relevant to closure. The CWTP will be closed through removal of CCR material impounded within the pond by mechanical excavation and hydraulic dredging.</p> <p>After the CCR has been removed to bottom of impounded CCR throughout the base of the pond and certified as a closed CCR unit, the CWTP will be designated as a non-CCR pond, serving only</p>

	<p>to provide lake water to a pump station operated by the adjacent coal mine.</p> <p>In accordance with §257.102(b)(3), this Amendment 1 revises information in the initial written closure plan regarding the nature of closure construction, dates, and regulatory framework information. The current version of the closure plan reflects the information and planning available at the time of issuance.</p>
<p>§257.102(b)(1)(ii) – If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with paragraph (c) of this section.</p>	<p>Applicable. The CWTP will be closed by removing the existing CCR in accordance with a design that incorporates the requirements of §257.102(c), as discussed in response to that section below.</p>
<p>§257.102(b)(1)(iii) – If closure of the CCR unit will be accomplished by leaving CCR in place, a description of the final cover system, designed in accordance with paragraph (d) of this section, and the methods and procedures to be used to install the final cover. The closure plan must also discuss how the final cover system will achieve the performance standards specified in paragraph (d) of this section.</p>	<p>Not applicable. The CWTP will be closed by removing CCR in accordance with §257.102(c).</p>
<p>§257.102(c) <b>Closure by removal of CCR</b> —</p>	
<p>§257.102(c) <i>Closure by removal of CCR.</i> An owner or operator that elects to close a CCR unit by removal of CCR must follow the procedures specified in either paragraph (c)(1) or (2) of this section. Closure by removal is complete when CCR has been removed; any areas affected by releases from the CCR unit have been removed or decontaminated; and groundwater monitoring concentrations of the constituents listed in appendix IV to this part do not exceed groundwater protection standards established pursuant to</p>	<p>Applicable.</p> <p>CCR within the removal area limits shown on Figure 1 will be removed by dredging and/or mechanical excavation.</p> <p>Construction is expected to consist of the following activities:</p> <ol style="list-style-type: none"> <li>1. Permanently abandon existing NPDES Internal Outfall No. 01E using a formed concrete bulkhead within the inlet structure.</li> <li>2. Perform a pre-dredge bathymetric survey and barge- and land-based geotechnical</li> </ol>

<p>§257.95(h). Removal and decontamination activities include removing all CCR from the unit, CCR mixed with soils, and CCR included in berms, liners, or other unit structures, and removing or decontaminating all areas affected by releases from the CCR unit.</p>	<p>boring program to develop approximations of the top and bottom of CCR surfaces.</p> <ol style="list-style-type: none"><li>3. Perform a mass excavation pass of the entire CCR removal area using dredge machine control to assure sufficient coverage and depth of removal.</li><li>4. Monitor completeness of removal by actively monitoring the cutterhead performance/response and the color of dredge discharge to the decant pond.</li><li>5. Maintain 3H:1V (Horizontal:Vertical) slope offset of dredge operations from inside crest of northern dike.</li><li>6. Remove all identified CCR from bank areas around the west and south sides of the CWTP.</li><li>7. Dewater excavated and dredged spoils sufficiently for landfill disposal and load/haul to the Plant's on-site CCR landfill.</li><li>8. After 7-day settling period, perform a polishing dredge pass over the entire CCR removal area to remove any resettled CCR.</li><li>9. Perform a post-dredge bathymetric survey and removals verification sampling for visual inspection for presence of CCR.</li></ol> <p>The Contractor may utilize the existing decant cells to dewater and stack dredge spoils, deploy floating silt booms to limit redistribution of impacted sediments, and/or construct/install other temporary measures to facilitate CCR removal and dewatering.</p> <p>The primary method for assessment of completeness of removal will be visual inspection. CCR is predominantly grey, whereas the foundation soils underlying the impounded CCR are various shades of brown.</p>
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	<p>After CCR removal from the pond, APS will monitor the certified groundwater monitoring system associated with the CWTP to demonstrate that the concentrations of constituents listed in Appendix IV to §257 comply with groundwater protection standards.</p> <p><u>Exclusion of the Northern Dike –</u></p> <p>The CWTP was formed by construction of the northern dike, an earthen embankment, across a cove area on the south side of Morgan Lake. The northern dike created one side of what is now known as the cooling water return canal, as shown on Figure 1. The northern dike was constructed on sluiced CCR deposits that had been discharged from the plant, directly to the cove and the lake prior, to the Clean Water Act of 1972. APS has documented a 20-foot thickness of CCR beneath the central portion of the northern dike.</p> <p>APS has determined that its operational obligations preclude removal of the northern dike to access CCR sediments beneath it and within the adjacent cooling water return canal during the operational life of the plant. To ensure the northern dike continues to perform its current function reliably, AECOM specified a buffer to dredging activities to avoid undermining the CWTP-side of the dike. The closure design requires dredge operations to be offset from a 3:1 (H:V) slope “envelope” measured from CWTP-side crest of the northern dike to the base of the dredge excavation within the CWTP.</p> <p>The residual CCR left in place for dike stability, and any CCR that forms the foundation of the dike, will be identified in the future as a CCR Management Unit (CCRMU) in forthcoming Facility Evaluation Reports prepared for Four Corners Power Plant as part of compliance with the CCR Rule [40 CFR § 257.75].</p>
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<p>§257.102(c)(1) <i>Complete all removal and decontamination activities during the active life of the CCR unit.</i> Within the timeframes specified in paragraph (f) of this section the owner or operator must do all of the following:</p>	<p>Applicable. See responses below.</p>
<p>§257.102(c)(1)(i) Complete removal of CCR and decontamination of all areas affected by releases from the CCR unit;</p>	<p>Within the active life of the facility, removal and decontamination activities will remove CCR, CCR mixed with soils, and CCR included in berms, liners, or other unit structures, with the exception of CCR associated with the northern dike, which will be identified as a CCRMU.</p>
<p>§257.102(c)(1)(ii) Document that the standards in paragraph (c) of this section have been met. Documentation that groundwater protection standards have been met for the constituents listed in appendix IV to this part must consist of groundwater monitoring results that show no constituents were detected at statistically significant levels above the groundwater protection standards for either:</p> <p>(A) Two consecutive monitoring events; or</p> <p>(B) Three years, in accordance with § 257.98(c); and</p>	<p>APS anticipates that groundwater monitoring concentrations of the constituents listed in Appendix IV to §257, will show that no constituents are detected at statistically significant levels above the groundwater protection standards for two consecutive monitoring events after removal and decontamination of areas affected by releases from the unit is complete.</p>
<p>§257.102(c)(1)(iii) Obtain the completion of closure certification or approval required by paragraph (f)(3) of this section.</p>	<p>APS plans to obtain separate certifications by qualified professional engineers that: 1) all CCR has been removed from the CWTP and that areas affected by releases from the CWTP have been removed or decontaminated; and 2) groundwater monitoring concentrations of the constituents listed in Appendix IV to §257 will show that no constituents are detected at statistically significant levels above the groundwater protection standards. Certifications will be provided within the applicable closure timeframe (see Closure Schedule below).</p>

<p>§257.102(c)(2) <i>Complete removal and decontamination activities during the active life and post-closure care period of the CCR unit.</i> The owner or operator may close a CCR unit by completing all removal and decontamination activities, except for groundwater corrective action, during the active life of the CCR unit and by completing groundwater corrective action during the post-closure care period pursuant to the following procedures:</p>	<p>Not applicable.</p>
<p><b>INVENTORY AND AREA ESTIMATES</b></p>	
<p>§257.102 (b)(1)(iv) – An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.</p>	<p>175.5 acre-feet.</p>
<p>§257.102 (b)(1)(v) – An estimate of the largest area of the CCR unit ever requiring a final cover as required by paragraph (d) of this section at any time during the CCR unit’s active life.</p>	<p>Not applicable.</p>

<b>CLOSURE SCHEDULE</b>	
<p>§257.102 (b)(1)(vi) – A schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of CCR unit closure. When preparing the written closure plan, if the owner or operator of a CCR unit estimates that the time required to complete closure will exceed the timeframes specified in paragraph §257.102(f)(1) of this section, the written closure plan must include the site-specific information, factors and considerations that would support any time extension sought under paragraph §257.102(f)(2) of this section.</p>	<p>The following milestones are estimates based on current understandings relative to the date this plan was prepared. Activities associated with some milestones may overlap.</p> <p>Amendments to milestones and timeframes may be provided as more or different information becomes available.</p>
Initial Written Closure Plan Completed	August 30, 2016
Closure Plan Amendment 1	April 13, 2026
Date of Final Receipt of CCR	November 23, 2020
Closure Activities Initiated	November 23, 2020
Complete CCR Removal	December 2024
Date of Closure Extension Demonstration	February 5, 2026
Timeframe to Complete Closure (including 2-Year Extension)	November 23, 2027

Attachments:

- Certification Statement 40 CFR § 257.102(b)(4) – Amended Written Closure Plan for a CCR Surface Impoundment, dated April 13, 2026.

Figures:

- Figure 1: Combined Waste Treatment Pond Closure – Plan View

## **Attachments**

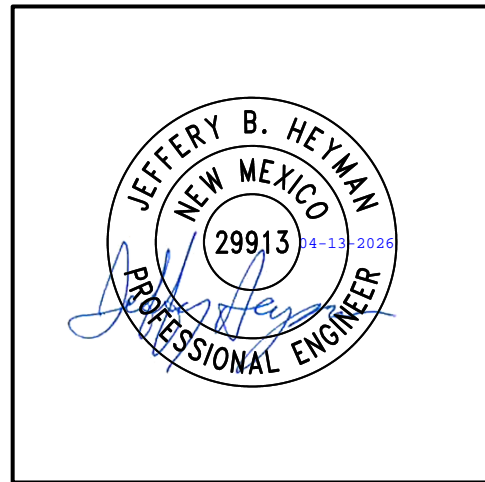
**Certification Statement 40 CFR § 257.102(b)(4) – Amended Written Closure Plan for a CCR Surface Impoundment**

**CCR Unit: Arizona Public Service; Four Corner Power Plant; Combined Waste Treatment Pond**

I, Jeffery B. Heyman, being a Registered Professional Engineer in good standing in the State of New Mexico, 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 written closure plan dated April 13, 2026, meets the requirements of 40 CFR § 257.102.

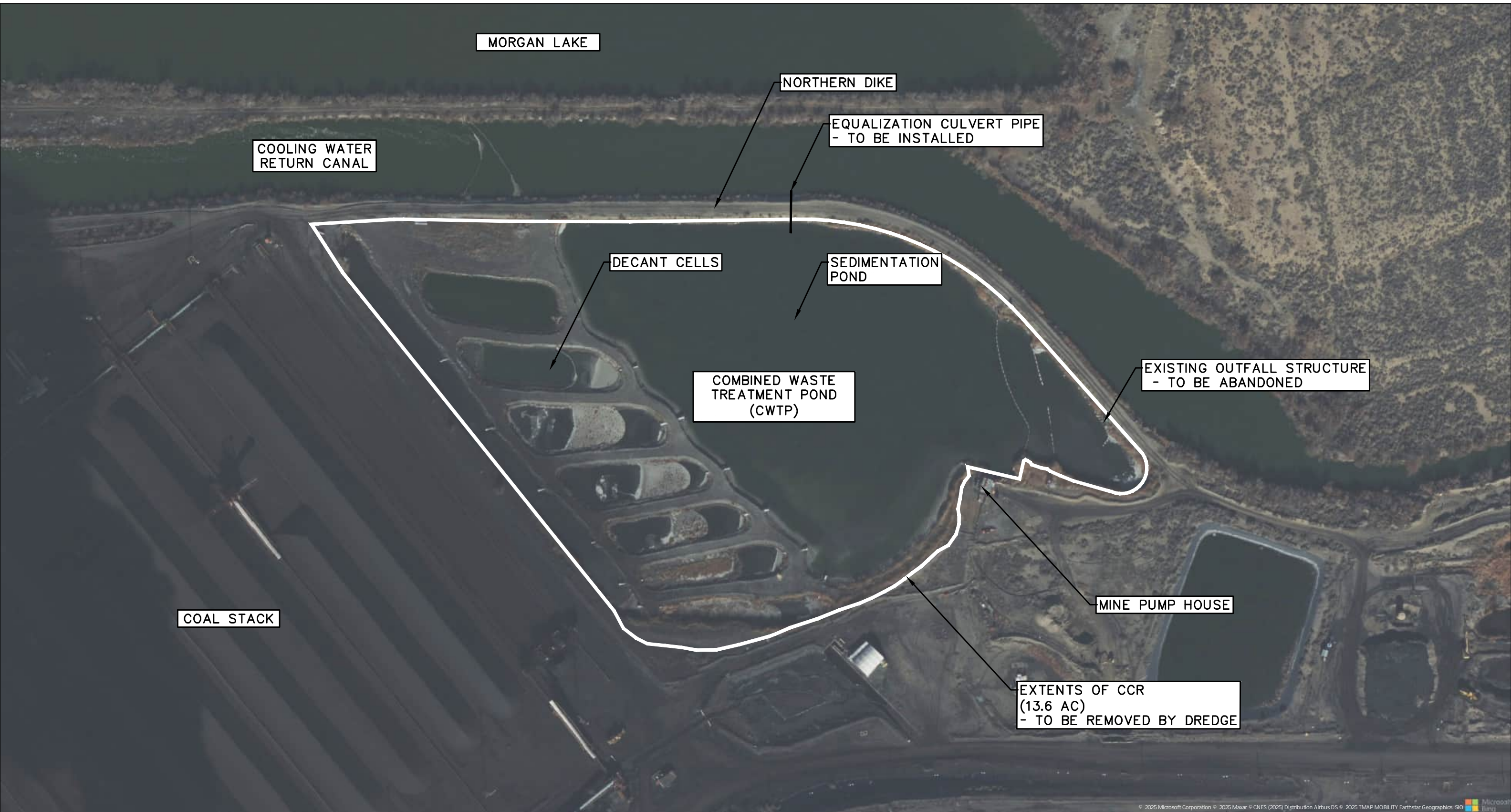
Jeffery B. Heyman, P.E.  
*Printed Name*

April 13, 2026  
*Date*



## Figures

DRAWING: C:\Users\ana.suguitan\AECOM\Engel, Matthew - CWTP\FINAL FIGURES\910-CAD\75-WORKING\APS\CWTP\_Figure 1 - Combined Waste Treatment Pond Closure - Plan View.dwg



PLAN VIEW  
SCALE: 1"=150' (FULL SIZE)

