



2023-07-15

Arizona Public Service Company
400 N. 5th Street
Phoenix, Arizona 85004

**Subject: Semiannual Report Documenting Progress In Remedy Selection
Multiunit 1 And The Upper Retention Sump
Four Corners Power Plant - Fruitland, New Mexico**

In accordance with 40 Code of Federal Regulations (CFR) Section (§) 257.97(a) of the Coal Combustion Residuals (CCR) Rule, this Semiannual Remedy Selection Progress Report (Semiannual Report) has been prepared on behalf of Arizona Public Service Company (APS) to document progress in selection of remedies for CCR units which have been identified as potentially impacting groundwater at the APS Four Corners Power Plant, located in Fruitland, New Mexico (the Site). Applicable Site CCR units include Multiunit 1 (comprised of the Lined Ash Impoundment and the Lined Decant Water Pond) and the Upper Retention Sump (URS). Semiannual progress reporting to support remedy selection began on July 15, 2019. The most recent update was provided in the *Annual Groundwater Monitoring and Corrective Action Report (GMCAR) for 2022*, dated January 31, 2023. This Semiannual Report serves as the ninth update on remedy selection progress at the site and documents activities completed to date in 2023.

SUMMARY OF ACTIVITIES COMPLETED IN 2023

Activities completed by APS in the first half of 2023 in support of remedy selection for Multiunit 1 and the URS include the following:

- *Groundwater Monitoring at Multiunit 1 and the URS.* Monitoring requirements pursuant to CFR § 257.95 have continued at both Multiunit 1 and the URS at a minimum on a semiannual basis.
- *Ongoing Operation of Extraction Wells at the URS.* In 2019 two extraction wells (CM-01, CM-02) were installed downgradient of the URS. This system is considered an interim corrective measure to evaluate the effectiveness of targeted extraction of groundwater downgradient of the URS with elevated fluoride concentrations. Transducers were installed in several wells around the URS and extraction system to monitor water level changes and evaluate performance in 2023. A performance evaluation and annual contaminant mass removal estimates from the seepage collection system will be included in the 2023 GMCAR. Additionally, the performance evaluation is expected to be included in remedy selection report.
- *Ongoing Operation of Seepage Collection Systems Downgradient of Multiunit 1.* Operation of the existing seepage intercept trench and extraction well systems has continued into 2023 and will continue throughout the year as part of interim response measures at Multiunit 1. Annual contaminant mass removal estimates from the seepage collection system will be calculated and included in the 2023 GMCAR.

WSP USA Environment & Infrastructure Inc.
4600 East Washington Street, Suite 600
Phoenix, Arizona 85034-1917

T: +1 602-733-6000
F: +1 602-733-6100
wsp.com



- *Replacement of Select Seepage Collection System Extraction Wells.* Following a well inspection program and operational assessment, select seepage collection system extraction wells were abandoned and replaced in June 2023 to improve the efficiency of this system.
- *Remedy Selection Report for the Multiunit 1 and the URS.* Preparation of a remedy selection report continued through the beginning of 2023 to document how the selected remedy will meet the requirements of 40 CFR §257.97(b).

FUTURE PLANNED ACTIVITIES

APS plans to perform the following activities in support of remedy selection during the second half of 2023 (and in upcoming years, as noted):

- *Continued Operation of the Extraction System at URS.* The extraction well system at URS will continue to serve as part of interim response measures until remedial activities begin. The seepage collection system will also likely be a part of final selected remedy.
- *Integration of Additional Extraction Wells into Seepage Collection System Operations at the URS.* Installation of additional extraction wells as part of the seepage collection system at the URS is planned for the second half of 2023.
- *Continued Operation of the Seepage Collection Systems Downgradient of Multiunit 1.* The seepage intercept system downgradient of Multiunit 1 will continue to serve as part of interim response measures until remedial activities begin. The seepage collection system will also likely be a part of final selected remedy.
- *Remedy Selection Reports for the URS and Multiunit 1.* Preparation of a remedy selection report documenting how the selected remedy will meet the requirements of 40 CFR §257.97(b) will continue during the second half of 2023.
- *Initiation of Remedial Activities.* Upon completion of the Multiunit 1 and URS Remedy Selection Reports, within 90 days APS will initiate and begin documentation of remedial activities for each CCR unit pursuant to 40 CFR §257.98(a).

Respectfully submitted,

WSP USA Environment & Infrastructure Inc.

Reviewed by:

Samantha O'Shea
Senior Consultant
Site Investigation & Remediation Team Lead
samantha.oshea@wsp.com

Maren Henley, PE
Project Manager
maren.henley@wsp.com

WSP ref.: 1420232011