



July 14, 2025

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

**Subject: Semiannual Report Documenting Progress In Remedy Selection
Multiunit 1 And 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 [LAI] and the Lined Decant Water Pond [LDWP]) 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 2024*, dated January 31, 2025. This Semiannual Report documents activities completed to date in 2025.

SUMMARY OF ACTIVITIES COMPLETED IN 2025

Activities completed by APS in the first half of 2025 in support of remedy selection for Multiunit 1 and the URS include the following:

- *Continued Assessment Monitoring at Multiunit 1 and the URS* – While corrective action evaluation progresses, assessment monitoring (including analysis of collected samples for Appendix III and Appendix IV constituents) has continued on a semi-annual basis at the Multiunit 1 and the URS per 40 CFR §257.95(b) and (d)(1).
- *Interim Response Measures at the URS* – Startup of groundwater extraction from CM-01 and CM-02 began in February 2022 and APS continued to operate the seepage extraction system throughout the first half of 2025. The extracted groundwater is discharged into a plant sump for reuse in plant operations. A performance evaluation and annual contaminant mass removal estimates from the seepage collection system will be included in the 2025 GMCAR. Additionally, the performance evaluation is expected to be included in the remedy selection report.
- *Interim Response Measures at Multiunit 1* – APS operated the Northern and Southern Intercept Trench throughout the first half of 2025 to intercept and collect seepage from Multiunit 1 and closed surface impoundments. The extracted groundwater is reused in plant operations. Annual contaminant

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mass removal estimates from the seepage collection system will be calculated and included in the 2025 GMCAR.

- *LAI and LDWP Closure Activities* – Detailed design of LAI/LDWP closure activities continued during the first half of 2025. A pilot-test field program to evaluate the extent and removal of drainable pore water in the LAI has also been ongoing since mid-2023. Multiple wells have been installed through the ash, above the base of the liner, with testing performed.
- *Remedy Selection Report for the Multiunit 1 and the URS*. Preparation of a remedy selection report continued through the beginning of 2025 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 2025 (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. Extraction wells URS-06 and URS-07 will have pumps installed in them and extracted groundwater will be discharged to the Upper Retention Tank in the second half of 2025.
- *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.
- *Preparation of Remedy Selection Report* – APS will select remedies for Multiunit 1 and the URS that meet the requirements of 40 CFR §257.97(b) and document the selection process in a remedy selection report prepared for each unit per 40 CFR §257.97(a).
- *Initiation of Remedial Activities* – Per 40 CFR §257.91(f), remedial activities at Multiunit 1 and the URS will begin within 90 days of selecting a remedy for each unit.

Respectfully submitted,

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