

FOUR CORNERS POWER PLANT UPPER RETENTION SUMP – CCR Closure Plan

Amendment 2

AECOM Project No. 60558087

December 17, 2025

Four Corners Power Plant
Upper Retention Sump – CCR Closure Plan

Prepared for:

Arizona Public Service
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Phoenix, AZ 85004

Prepared by:

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**FOUR CORNERS POWER PLANT
CLOSURE PLAN §257.102(b)
UPPER RETENTION SUMP
Amendment 2 (December 2025)**

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.

Prepared for Arizona Public Service (APS) by AECOM Technical Services, Inc. (AECOM)	
CLOSURE PLAN AMENDMENT HISTORY	
Initial	August 30, 2016
Amendment 1	July 24, 2018 Updated Scope and Schedule for Closure
Amendment 2	December 17, 2025 Updated Schedule for Closure. 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. Specifically, this plan was updated to include §257.102(c)(2) which allows for complete removal and decontamination activities during the active life of the unit with groundwater corrective action completed during the post-closure care period.
SITE INFORMATION	
Site Name / Address	Four Corners Power Plant / 691 CR-6100, Fruitland, NM 85416
Owner Name / Address	Arizona Public Service / 400 North 5 th Street, Phoenix, AZ 85004
CCR Unit	Upper Retention Sump
Location	36° 41' 14" N, 108° 28' 37.8" W
Reason for Initiating Closure	Replacement with a tank.
Final Cover Type	Not applicable
Closure Method	Closure by Removal

CLOSURE PLAN DESCRIPTION	
§257.102(b) Written closure plan —	
<p>(1) Content of the plan. 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.</p>	
<p>§257.102(b)(1)(i) – A narrative description of how the CCR unit will be closed in accordance with this section.</p>	<p>The Upper Retention Sump (URS) was an approximately 1-acre surge pond associated with operation of the flue gas desulfurization (FGD) systems for treatment of flue gas from Units 4 and 5 of the Four Corners Power Plant (FCPP). The pond had a soil-cement liner (“operations layer”) on the bottom and side slopes but was classified as “unlined” in accordance with §257.71(a)(3)(i).</p> <p>Following regular clean-out of accumulated CCR solids, the URS was closed by excavating and removing any remaining CCR, the existing soil cement operations layer from the pond bottom and side slopes, and any visibly impacted underlying soils.</p> <p>A reinforced concrete tank was constructed at the former location of the URS to replace the function of the URS.</p> <p>Figure 1 shows a plan view of the URS.</p> <p>Closure, CCR removal, and tank construction operations involved:</p> <ol style="list-style-type: none"> 1) Temporarily diverting URS inflows to the Lined Ash Impoundment; 2) Demolishing and removing the existing soil cement operations layer of the URS, along with any remaining CCR sediments, and placing in the Dry Fly Ash Disposal Area; and

	<p>3) Constructing a new reinforced concrete tank.</p> <p>The initial written closure plan was dated August 30, 2016. Amendment 1 was published shortly before closure was initiated to provide minor updates to the scope of closure and to update the closure schedule. In accordance with §257.102(b)(3), this Amendment 2 revises the closure schedule and provides editorial updates to closure construction, dates, and regulatory framework information. Amendment 2 also amends the Closure Plan to comply with the provisions of the USEPA’s “Legacy Coal Combustion Residuals Surface Impoundments and CCR Management Units” rulemaking, which became law on November 8, 2024 and amended 40 Code of Federal Regulations (CFR) §257 to introduce an accommodation for continued groundwater corrective action in the post-closure care period following the end of the active life of a CCR facility, as described in 40 CFR §257.102(c)(2) <i>Complete removal and decontamination activities during the active life and post-closure care period of the CCR unit.</i></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 URS was closed by removing the existing CCR in accordance with §257.102(c), as discussed in response to that section below, and replacing the facility with a reinforced concrete tank.</p> <p>The majority of impounded CCR solids were removed through regular clean-out activities. Closure-by-removal included demolition and removal of remaining CCR material and the soil cement operations layer using conventional excavators and loaders. The CCR material and operations layer were removed, transported to, and placed in the Dry Fly Ash Disposal Area.</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 URS was closed by removing the existing CCR in accordance with §257.102(c) and replacing the facility with a reinforced concrete tank.</p>
<p>§257.102(c) Closure by removal of CCR —</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 §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>Applicable. The URS was dewatered and existing CCR was removed. The soil cement operations layer at the base of the pond provided a boundary for identification of the extent of CCR wastes. Any visibly impacted soils located in the subgrade beneath the operations layer were also excavated and removed.</p> <p>The first two ‘completion’ standards of §257.102(c) (i.e., “closure is complete when CCR has been removed; [and] any areas affected by releases from the CCR unit have been removed or decontaminated”) were accomplished by removing visible CCR and visibly impacted underlying soil.</p> <p>With respect to the third and final ‘completion’ standard of §257.102(c) (i.e., closure is complete when...groundwater monitoring concentrations of the constituents listed in appendix IV to this part do not exceed groundwater protection standards established pursuant to §257.95(h)), APS will incorporate the requirements of §257.102(c)(2) as discussed in response to that section below.</p>
<p>§257.102(c)(1) <i>Complete all removal and decontamination activities during the active life of the CCR unit.</i></p>	<p>Not applicable.</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>Applicable. APS completed removal and decontamination activities during the active life of the facility and will complete groundwater corrective action during the post-closure care period.</p> <p>APS has identified groundwater impacts downgradient of the URS and completed an Assessment of Corrective Measures (Wood, 2019) for the unit. While APS continues to conduct assessment monitoring of groundwater, APS is currently implementing corrective action at the URS as an interim response measure and selecting a remedy for identified groundwater impacts. Collected groundwater data and progress regarding remedy selection are presented each year in the site Groundwater Monitoring and Corrective Action Report which is posted to the APS CCR Rule Compliance Data and Information website.</p> <p>Additional details regarding scheduling of unit closure activities are included in responses to §257.102(c)(2)(i) through (vi) in responses to those sections below.</p>
<p>§257.102(c)(2)(i) Within the timeframes specified in paragraph (f) of this section, document that CCR has been removed from the unit and any areas affected by releases from the CCR unit have been removed or decontaminated;</p>	<p>Applicable. APS completed and AECOM documented (AECOM, 2019) removal of CCR and any areas affected by releases from the URS in December 2018 and October 2019, respectively, prior to the applicable closure timeframe (see Closure Schedule below).</p>
<p>§257.102(c)(2)(ii) Within the timeframes specified in paragraph (f) of this section, begin implementation of the remedy selected in accordance with §257.97 such that all components of the remedy are constructed, or otherwise in place, and operating as intended unless the owner or operator documents both that:</p>	<p>Applicable. APS initiated groundwater corrective action as an interim response measure in February 2022, which is prior to the applicable timeframe; remedy components are operating as intended. Incorporation of this interim response measure in a remedy selected in accordance with §257.97 is forthcoming.</p>

<p>§257.102(c)(2)(ii)(A) All applicable requirements in §§ 257.96 through 257.98 have been met; and</p>	<p>Not anticipated to be applicable.</p>
<p>§257.102(c)(2)(ii)(B) The active life of the unit could not be extended until implementation of the remedy consistent with §257.102(f);</p>	<p>Not anticipated to be applicable.</p>
<p>§257.102(c)(2)(iii) Complete groundwater corrective action as a post-closure care requirement as specified in §257.104(g);</p>	<p>Applicable. Within the post-closure care period, APS plans to complete groundwater corrective action and to demonstrate that any areas affected by releases from the URS do not exceed the groundwater protection standards established pursuant to §257.95(h) for appendix IV constituents.</p>
<p>§257.102(c)(2)(iv) Amend the written closure plan required by paragraph (b) of this section and the written post-closure care plan required by §257.104(d);</p>	<p>Applicable. APS hereby amends the written closure plan required by paragraph (b) of this section and will continue to amend the written closure plan as warranted. Separately, APS has prepared an initial written post-closure care plan required by §257.104(d).</p>
<p>§257.102(c)(2)(v) Within the timeframes specified in paragraph (f) of this section, obtain the completion of closure certification or approval required by paragraph (f)(3) of this section; and</p>	<p>Applicable. APS received the completion of closure certification from a qualified professional engineer (AECOM, 2019) documenting that CCR had been removed from the unit and any areas affected by releases from the URS had been removed or decontaminated no later than prior to the applicable closure timeframe (see Closure Schedule below).</p>
<p>§257.102(c)(2)(vi) Within the timeframes specified in paragraph (f) of this section, record the notation on the deed to the property required by paragraph (i) of this section.</p>	<p>Applicable. APS submitted a request to the applicable agency to record a notation on the deed to the property required by §257.102(i) no later than the applicable closure timeframe (see Closure Schedule below). The deed restriction language notes that the land has been used as a CCR unit and its use is restricted under the post-closure care requirements identified in §257.104(d). Within 30 days of recording the notification, APS will prepare a notification for the</p>

	facility's operating record that the deed notation has been recorded.
INVENTORY AND AREA ESTIMATES	
§257.102 (b)(1)(iv) – An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.	1.07 acre-feet
§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.	Not applicable. The URS was closed by removing the existing CCR in accordance with §257.102(c). A reinforced concrete tank was constructed in place of the URS.
CLOSURE SCHEDULE	
§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>Amendments to milestones and timeframes may be provided as more or different information becomes available.</p> <p>Completion of groundwater corrective action will extend into the post-closure care period.</p>

Initial Written Closure Plan Completed	August 2016
Closure Plan Amendment 1	July 2018
Date of Final Receipt of CCR and Closure Activities Initiated	December 10, 2018
Complete Dewatering and CCR Removal	December 14, 2018
Closure Extension Demonstration	December 10, 2023
Closure Plan Amendment 2	December 2025
Complete Closure and Transition to Post-Closure Care	December 10, 2025
Complete Groundwater Corrective Action	During Post-Closure Care Period
REFERENCES	
AECOM, 2019. AECOM Technical Services, Inc. Letter to APS. URS CCR Removal and Construction Certification. October 31, 2019.	
Wood, 2019. Assessment of Corrective Measures for Multiunit 1 and the URS. Arizona Public Service Four Corners Power Plant – Fruitland, New Mexico. June 14, 2019.	

Attachments:

- Certification Statement 40 CFR § 257.102(b)(4) – Amended Written Closure Plan for a CCR Surface Impoundment, dated December 17, 2025.

Figures:

- Figure 1: Four Corners Power Plant Upper Retention Sump Closure

Attachments

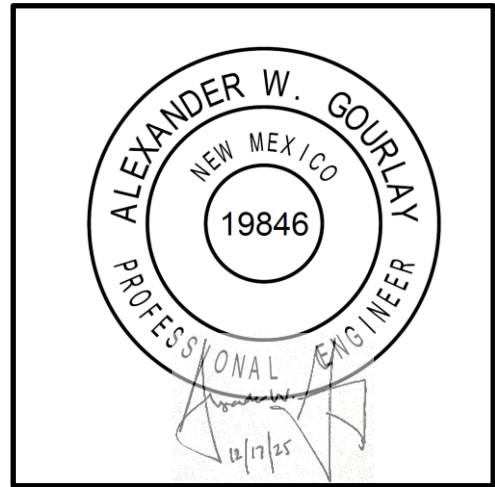
Certification Statement 40 CFR § 257.102(b)(4) – Amended Written Closure Plan for a CCR Surface Impoundment

CCR Unit: Arizona Public Service; Four Corners Power Plant; Upper Retention Sump

I, Alexander W. Gourlay, 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 December 17, 2025, meets the requirements of 40 CFR § 257.102.

Alexander W. Gourlay, P.E.
Printed Name

December 17, 2025
Date



Figures



