



Neal Brown
Department Manager
Environmental Operations

Tel. 602-250-2414
e-mail: Neal.Brown@aps.com

400 N. 5th Street
Mail Station 9303
Phoenix, Arizona 85004

December 10, 2023

**Subject: §257.102(f)(2)(i) 2-YEAR CLOSURE TIMEFRAME EXTENSION
UPPER RETENTION SUMP
Four Corners Power Plant – Fruitland, New Mexico**

Pursuant to 40 Code of Federal Regulations (CFR) Section (§) 257.102(f)(2)(i) of the Coal Combustion Residuals (CCR) Rule, Arizona Public Service (APS) submits this 2-year extension demonstration to the facility operating record to extend the timeframe to complete closure of the Upper Retention Sump (URS) from December 10, 2023 to December 10, 2025. In accordance with §257.102(c) and §257.102(f)(1)(ii), CCR surface impoundments closed by removal must remove and decontaminate the CCR unit, including associated impacted groundwater, within 5 years of commencing closure activities unless it is demonstrated that additional time is required due to factors beyond the facility's control.

Initiation of closure for the URS occurred on December 10, 2018, following the cessation of CCR flow to the URS. Despite the timely identification of the URS for closure, removal of the unit and its contents (complete as of December 14, 2018), characterization of groundwater impacts, assessment of corrective measures, and implementation of interim corrective measures, the URS groundwater monitoring well network continues to indicate Appendix IV constituent (i.e., fluoride) concentrations at statistically significant levels greater than the groundwater protection standard (GWPS). Factors that contribute to not being able to complete closure activities (including compliance with groundwater GWPSs) within 5 years include:

- Groundwater impacts from past URS operation up to 400 ft downgradient of the unit;
- Constraints placed on groundwater characterization and implementation of interim corrective measures associated with an operating power plant with existing facility infrastructure; and
- Hydrogeologic limitations associated with remediating the groundwater aquifer.

If you have any questions regarding this extension, please contact Natalie Chrisman Lazarr at 602.316.1324 or via email at natalie.chrisman@aps.com

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,

A handwritten signature in blue ink that reads "Neal B" with a stylized flourish at the end.

Neal Brown
Manager, Environmental Operations