

FOUR CORNERS POWER PLANT UPPER RETENTION SUMP – CCR Post-Closure Plan

AECOM Project No. 60558087

December 17, 2025

Four Corners Power Plant
Upper Retention Sump – CCR Post-Closure Plan

Prepared for:

Arizona Public Service
400 North 5th Street
Phoenix, AZ 85004

Prepared by:

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**FOUR CORNERS POWER PLANT
 POST-CLOSURE PLAN §257.104(d)
 UPPER RETENTION SUMP**

Post-Closure Plan Contents §257.104(d)(1)

Content of the plan. The owner or operator of a coal combustion residual (CCR) unit must prepare a written post-closure plan that includes, at a minimum, the information specified in paragraphs (d)(1)(i) through (iii) of this section.

Prepared for Arizona Public Service (APS) by AECOM Technical Services, Inc. (AECOM)	
POST-CLOSURE PLAN AMENDMENT HISTORY	
Initial	<p>December 17, 2025 – The United States Environmental Protection Agency’s (USEPA’s) “Legacy Coal Combustion Residuals Surface Impoundments and CCR Management Units” rulemaking, which amended 40 Code of Federal Regulations (CFR) §257 and became law on November 8, 2024, introduced an accommodation for continued groundwater corrective action during 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>This initial Post-Closure Care Plan describes the completion of groundwater corrective action for the Upper Retention Sump (URS) during the post-closure care period in accordance with the provision of 40 CFR §257.102(c)(2).</p>
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 (URS)
Location	36° 41’ 14” N, 108° 28’ 37.8” W

Reason for Initiating Closure	Replacement with a tank.
Closure Method	Closure by Removal and replacement with a tank.
POST-CLOSURE PLAN DESCRIPTION	
§257.104(d)(1)(i) – A description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed;	Responses for the three specific requirements of paragraph (b) of this section (§257.104(b)(1), (2), and (3)) are provided in following sections.
§257.104(b)(1) – Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover, as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover;	Not applicable. There is no final cover system because the CCR within the URS was removed during the closure period of the active life of the unit.
§257.104(b)(2) – If the CCR unit is subject to the design criteria under § 257.70, maintaining the integrity and effectiveness of the leachate collection and removal system and operating the leachate collection and removal system in accordance with the requirements of §257.70; and	Not applicable. The URS was never a landfill. It had no leachate collection and removal system and therefore is not subject to the design criteria under §257.70.
§257.104(b)(3) – Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of §§257.90 through 257.98.	Applicable. APS has identified groundwater impacts downgradient of the URS and completed an Assessment of Corrective Measures (Wood, 2019) for the unit. APS is currently in the process of selecting a remedy for identified groundwater impacts and intends to complete groundwater Corrective Action in the post-closure care period pursuant to §257.102(c)(2). Throughout groundwater Corrective Action, the certified Groundwater Monitoring System (AECOM, 2017) for the URS will continue to be maintained and monitored on a semiannual basis in accordance with the requirements of §257.95

	<p>(Assessment Monitoring Program), as well as any additional requirements defined in a forthcoming Corrective Action Groundwater Monitoring Program developed pursuant to §257.98(a)(1).</p>
<p>§257.104(d)(1)(ii) – The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period; and</p>	<p><u>Neal Brown</u> <u>Arizona Public Service</u> <u>400 North 5th Street Phoenix, AZ 85004</u> <u>(602) 250-1000</u></p>
<p>§257.104(d)(1)(iii) – A description of the planned uses of the property during the post-closure period. Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring systems, unless necessary to comply with the requirements in this subpart. Any other disturbance is allowed if the owner or operator of the CCR unit demonstrates that disturbance of the final cover, liner, or other component of the containment system, including any removal of CCR, will not increase the potential threat to human health or the environment.</p>	<p>Applicable. The URS was a former CCR unit used for transfer and short-term storage of flue gas desulfurization (FGD) slurry, which is classified as CCR material. The URS was demolished and all CCR and CCR-impacted underlying soils were excavated and placed in the Dry Fly Ash Disposal Area from June 25, 2018, to December 14, 2018.</p> <p>After removal of the URS, the location was repurposed for an open air, in-ground concrete tank serving a similar function. The “URS Tank” is a self-supporting, vertically sided concrete tank that was constructed within a portion of the former URS footprint and with approximately the same base elevation as the former URS.</p> <p>The property formerly occupied by the URS is located within the Four Corners Power Plant power block. APS controls site access and prevents unauthorized access while completing groundwater Corrective Action. The eventual disposition of the in-ground concrete tank at the time of final site decommissioning, closure, and reclamation is not yet determined but will reasonably include cleaning and backfill to grade to allow vegetation and other natural systems to reestablish.</p>

CLOSURE SCHEDULE	
Initial Written Post-Closure Plan Completed	December 2025
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
Complete Closure and Transition to Post-Closure Care	December 10, 2025
Complete Groundwater Corrective Action	During Post-Closure Care Period
REFERENCES	
AECOM, 2017. CCR Monitoring Well Network Report and Certification, Four Corners Power Plant, Fruitland, New Mexico. AECOM Job No. 60531071. Report dated September 18, 2017.	
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.	

Attachment:

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

Attachment

Certification Statement 40 CFR § 257.104(d)(4) – Initial Post-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 post-closure plan dated December 17, 2025, meets the requirements of 40 CFR § 257.104.

Alexander W. Gourlay, P.E.
Printed Name

December 17, 2025
Date



