# Better Coal Ash Mitigation Practices

## Coal Ash Remediation in Practice

Coal ash is the toxic remains of coal being burned in coal plants. The most comprehensive law to address coal ash waste is the 2015 Coal Combustion Residuals rule, or the [CCR Rule](https://earthjustice.org/category/case/coal-ash-regulations). Under this rule coal-fired electric utilities were required for the first time to publicly report groundwater monitoring data for the first time. This is required so that the public, as well as state and federal regulators, can determine compliance. In 2018 Earthjustice published a [comprehensive assessment](https://earthjustice.org/features/map-coal-ash-contaminated-sites) of CCR Compliance where they found that 91% of the 265 coal plants across the United States (US) contain groundwater monitoring data with toxic levels exceeding safe levels.

Under the CCR Rule, after closure is announced, coal plant operators also have to publish a closure plan (“Assessment of Corrective Measures”) under §257.96(d). Under §257.96(g) coal plant operators must conduct a full investigation of the nature and extent of the release of coal ash constituents from the CCR unit. The polluter must design a remedy that: protects human health and the environment; attains the groundwater protection standard; controls the source(s) of releases so as to reduce or eliminate, to the maximum extent feasible, further releases into the environment; removes from the environment as much of the contaminated material that was released from the CCR unit as is feasible §257.97(b)(1)-(4).

The polluter must also solicit public input on all cleanup plans and, in selecting a remedy, must consider community concerns §§257.96(e), 257.97(c)(4). After preparing a cleanup plan, the polluter must select remedy “as soon as feasible” §257.97(a).The polluter must initiate cleanup within 90 days of remedy selection §257.98(a). The polluter must complete the cleanup “within a reasonable time” §257.97(d). The polluter must take any “interim measures” necessary to reduce leaking contaminants and potential exposures to human or ecological receptors §257.98(a)(3). Earthjustice has published a [toolkit](https://docs.google.com/document/d/1woDXd_i0xFOA6VOoDVEd8VuKQMxW1piPOkZB0n51Mq8/edit) to help communities hold coal operators accountable regarding the CCR Rule.

The CCR Rule is robust, but of course has limits. The primary issue in regards to coal plants on Navajo Nation is that the coal ash rule does not cover coal ash at the site. Most of the successful examples (seen below) have been in relation to large bodies of water, and have implications under the Clean Water Act’s designation of navigable waters (see [Federal and State Coal Ash Regulations report](https://docs.google.com/document/d/1k-3KROE-hR1aHXe-7bEBkVpQoW5jNrnXMk2PNb8zZH8/edit?usp=sharing)).

Excavation and clean closure is often thought of the [only safe way](https://eelp.law.harvard.edu/2017/12/coal-ash-rule/) to deal with closure. Clean closure requires excavation to remove coal from contact with groundwater and/or removing it from impoundments that are unsafely sites (for example where a dam collapse would cause catastrophic release of coal ash into a river). In many remediation cases, once excavated coal ash is placed into lined pits (often the previous pits are unlined and can seep into groundwater). Coal ash can also be [reused safely](https://www.nrdc.org/experts/scott-slesinger/coal-ash-why-it-better-recycled-waste) as concrete and wallboard.

Of course, just because a law exists does not not ensure compliance. The coal ash remediation success stories are often the result of years of litigation, independent testing, strong partnerships amongst an array of environmental organizations, and public participation and pressure on plant operators and regulators.

## Case Studies

### Grainger Generating Station, South Carolina

The Grainger Generating Station was a coal power plant located near Conway, South Carolina that closed in 2012. The two units had an operating capacity of 170 MW and it was owned by Central Electric Power Cooperative and operated by Santee Cooper. In 2016, coal ash reports showed arsenic pollution had dropped significantly as coal ash has been removed from unlined pits at the site.

By 2016, Santee Cooper had removed over [500,000 tons of coal ash](https://www.southernenvironment.org/news-and-press/press-releases/arsenic-pollution-plummets-at-grainger-site-as-coal-ash-is-removed-in-south)- almost half of the coal ash in its pits on the Waccamaw River. As a result, arsenic groundwater contamination dropped by 60 percent to 90 percent. “These results show that removing coal ash from unlined riverfront pits dramatically reduces pollution, as well as the risk of catastrophic failure,” [said](https://www.southernenvironment.org/news-and-press/press-releases/arsenic-pollution-plummets-at-grainger-site-as-coal-ash-is-removed-in-south) Frank Holleman, senior attorney at the Southern Environmental Law Center.

This is a result of a 2013 settlement that was reached between conservation groups and Santee Cooper after a year and a half of litigation. The Southern Environmental Law Center represented various conservation groups- the Waccamaw Riverkeeper, the South Carolina Coastal Conservation League, and the Southern Alliance for Clean Energy.

The Grainger settlement agreement requires complete removal by the end of 2023, and they are in the [final stages](https://www.myrtlebeachonline.com/news/local/article244272297.html) of cleanup now. In [September of 2013](https://www.southernenvironment.org/uploads/words_docs/2013-11-22_Grainger_Groundwater_Semi_Annual_Report.pdf), before ash removal began, one monitoring well had arsenic contamination of 450 ppb, or 45 times the state standard. By April 2016, contamination had [dropped](https://www.southernenvironment.org/news-and-press/press-releases/arsenic-pollution-plummets-at-grainger-site-as-coal-ash-is-removed-in-south) two thirds, to 330 ppb. The most contaminated groundwater dropped from 3372 ppb, or 337 times the standard, to 691 ppb, or an 80 percent decrease.

In 2014 Santee Cooper started excavating the ash ponds and was about 87 percent complete when [Hurricane Florence](https://www.myrtlebeachonline.com/news/local/article244272297.html) came through the area in October 2018. When Santee Cooper began excavating the two ash ponds, they contained [1.8 million tons of coal ash](https://www.myrtlebeachonline.com/news/local/article230077379.html). The Grainger coal ash is also being recycled into concrete at a conventional manufacturing facility, creating jobs and reducing the environmental impacts of concrete manufacturing.

Once all the ash and soil are removed, Santee Cooper will return the pond area to its natural wetlands state. Santee Cooper is [planting](https://www.myrtlebeachonline.com/news/local/article244272297.html) a mixture of species over the next year or so in the flooded area including a variety of oaks, bald cypress, swamp tupelo and red maple. The wetlands restoration efforts will protect and improve water quality, recharge underground aquifers, and act as a sponge to mitigate large flood events for residents in surrounding areas.

In the wake of this, in 2019 Santee Cooper announced it was developing plans to [close its remaining coal ash ponds](https://www.postandcourier.com/business/santee-cooper-developing-plans-to-clean-up-remaining-coal-ash-ponds/article_544c06e0-233c-11ea-94b9-ffcde9116688.html) in South Carolina by selling or landfilling more than 13.5 million tons of the waste currently stored in unlined pits. This includes Winyah Creek Power Station, a 1,260 MW coal-fired power station that plans to close two units by 2023 and two other units by 2027. In 2008, Winyah Creek Power Station [leaked](https://earthjustice.org/sites/default/files/sc-coal-ash-factsheet0811.pdf) coal ash from one of its ponds. The utility operator, Santee Cooper, is [planning](https://www.postandcourier.com/business/santee-cooper-developing-plans-to-clean-up-remaining-coal-ash-ponds/article_544c06e0-233c-11ea-94b9-ffcde9116688.html) to remove the coal ash from the site. At Winyah, Santee Cooper has partnered with SEFA of Lexington, S.C., for the construction of a new facility which converts the coal ash to a form where it can be recycled for concrete.

### Wateree Station, South Carolina

In December 2019, Dominion Energy finished excavating 3.5 million tons of arsenic- contaminated coal ash from its Wateree Station on the banks of the Wateree River, fulfilling a mandate from a court settlement finalized in 2012. Wateree Station is a 771.8-megawatt (MW) coal-fired power station owned and operated by [SCANA](https://www.gem.wiki/SCANA) near Eastover, South Carolina.

The [settlement](https://www.southernenvironment.org/news-and-press/press-releases/utility-completes-required-excavation-of-tons-of-coal-ash) reached by the SELC representing the Catawba Riverkeeper Foundation required SCE&G (now Dominion Energy) to dig out coal ash the utility had stored in unlined pits bordering the Wateree River. Arsenic from the coal ash had leaked into groundwater and then into the river. Prior to this, coal ash was being held in pits without a protective plastic liner, which allowed arsenic and other toxic materials to seep into groundwater. The Wateree site had [7 billion](https://abcnews.go.com/US/wireStory/utility-finishes-removing-toxic-coal-ash-sc-power-67922817) pounds (3.2 billion kilograms) of coal ash.

### Possum Point, Virginia

Possum Point Power Station was a coal plant until 2002 when the two units became mixed oil and gas units. It is operated by Dominion Virginia Power. Up until 2002 it, and the two units are now used as. Possum Point is located on Quantico Creek and the Potomac River, and carcinogens had leaked into the water from the toxic coal ash ponds, which went into the groundwater and then drinking wells.

The Potomac Riverkeeper Network (PRKN) discovered that water containing heavy metals called seeps had been leaking from unlined ash ponds for decades into the creek. PRKN conducted independent testing of the private drinking wells around Possum Point, and the lab results [showed](https://www.potomacriverkeepernetwork.org/the-story-behind-our-success-at-cleaning-up-possum-point-coal-ash/) that “untreated water from the wells at the properties addressed [on] Possum Point Road should not be used for potable purposes.” These lab results proved that carcinogenic metals from coal ash had move off site and into residential drinking wells. Further, aerial surveillance proved Dominion had drained an entire 52 million gallon ash of waste water into Quantico Creek.

The PRKN then in 2015 asked the EPA to conduct a criminal investigation against Dominion Energy. Through this the PRKN legal team uncovered a Dominion Engineering document [proving](https://www.potomacriverkeepernetwork.org/the-story-behind-our-success-at-cleaning-up-possum-point-coal-ash/) 27.5 million gallons of contaminated ash water had been dumped into Quantico Creek.

This began a four year [battle](https://earthjustice.org/blog/2020-february/in-the-fight-to-clean-up-coal-ash-these-states-are-making-progress) to hold Dominion Energy accountable for 27 million cubic yards of coa ashl that is stored in unlined ponds across the state- including one coal ash pit where groundwater contained 30 times more arsenic than the maximum amount the state considers safe. Throughout this process, Virginia’s Department of Environmental Quality denied any waste water from Dominion’s ash ponds had been drained into the creek.

Through this time, the PRKN hosted public forums attended by hundreds of people, engaged elected officials, and mobilized coalition partners and the public to join their “Move Your Ash” coal ash campaign. With this momentum they encouraged calls, emails, and letters to elected officials in support of coal ash legislation

This culminated in March 2019 when Governor Ralph Northan signed [Senate Bill 1355](https://www.washingtonpost.com/local/virginia-politics/coal-ash-clean-up-bill-wins-bipartisan-backing-in-virginia/2019/01/24/99c2a798-1ff4-11e9-8e21-59a09ff1e2a1_story.html), a historic bipartisan agreement that requires Dominion Energy to move its coal ash from leaking ponds to landfills with liners. This legislation also bans “cap-in-place” closures of unlined ponds and requires Dominion Energy to recycle at least 25 percent of the ash into encapsulated uses (such as concrete and wallboard). This bill in large is considered a success, even though Dominion was able to [recover the full cost](https://earthjustice.org/blog/2020-february/in-the-fight-to-clean-up-coal-ash-these-states-are-making-progress) of the project from ratepayers (adding an estimated $5 to average monthly bills for the next 15-20 years).

In 2020 Dominion Energy agreed to pay $1.4 million in fines after allegations that it violated seven state and federal environmental laws at two separate power stations, including in large part the 27 million gallons of polluted coal ash water into Quantico Creek. Previously, Dominion has claimed that the discharge was all in compliance with its Clean Water Act permit.

As a result of the 2019 legislation that the [Southern Environmental Law Center](https://www.southernenvironment.org/news-and-press/news-feed/dominion-energy-agrees-to-pay-1.4-million-fine-years-after-saying-its-toxic-water-dump-was-legal) (SELC) assisted with, Dominion is required to excavate all of the coal ash in the ponds at Possum Point and Chesterfield, along with the Bremo and Chesapeake sites. Eventually all of the coal ash must be placed into modern, fully-lined landfills or recycled into cement or concrete.

### North Carolina

Duke Energy has 14 former power plant sites in North Carolina that the SELC and others have spent years fighting. As a result, in 2019 the North Carolina State Department of Environmental Quality issued an historic [order](https://earthjustice.org/blog/2019-april/coal-ash-victory-in-north-carolina-serves-as-a-model-for-the-nation) that required Duke Energy to clean up all coal ash ponds in the state and move the toxic ash to lined landfills. The directive called for all the ash in wet, unlined pits near waterways to be excavated and moved to dry storage — about 80 million tons across [six Duke Energy coal ash sites](https://www.southernenvironment.org/uploads/words_docs/2018_6sites_v4.pdf).

This was the result of years of activism that gained traction after two pipes failed in 2014 at a Duke dump site near the Virginia border, [sending](https://energynews.us/2020/01/13/how-duke-and-its-foes-agreed-to-the-largest-coal-ash-cleanup-in-u-s-history/) 70 miles of toxic sludge into the Dan River. A contentious legal battle ensued where Duke appealed decisions and a host of community groups including the NAACP, Sierra Club, and the Catawba Riverkeeper Foundation, the Southern Environmental Law Center intervened to fight Duke’s appeal alongside the state.

Prior settlements and court orders required cleanups and excavation of 46 million tons of the toxic coal ash at eight other Duke Energy sites in North Carolina, and this order required that the utility’s sites at its Allen, Belews Creek, Cliffside, Marshall, Mayo, and Roxboro facilities are [added to that list](https://www.southernenvironment.org/uploads/words_docs/Map_of_Drinking_Water_Downstream_from_Coal_Ash_in_North_Carolina_12.31.2019.pdf). A timeline highlighting key moments in North Carolina's coal ash history is [available here](https://www.southernenvironment.org/uploads/words_docs/2019-12-31_NC_coal_ash_timeline_updated.pdf).

The coal ash of Duke’s plants in North Carolina are a mix of dry and wet storage. In some instances there are complex sets of impoundments that sprawl across large tracts of dry land, as is the case of the Roxboro site, as well as one close to Lake Normal. At some sites, Duke built legally permitted landfills on top of that buried ash. Those permitted landfills aren’t covered by state law, but Duke and North Carolina officials [disagreed](https://energynews.us/2020/01/13/how-duke-and-its-foes-agreed-to-the-largest-coal-ash-cleanup-in-u-s-history/) over whether the ash underneath them was.

Some of this ash was far from water supplies and could be mitigated with engineering, but other buried ash was dangerously close to waterways. The 2019 agreement allows Duke to leave about 3.3 million tons in designated ash waste pits but requires a nearly equal amount to be excavated from lined landfills, unlined landfills, and some ash beneath them — all depending on their proximity and risk to rivers and lakes.

In January 2021, a milestone [settlement](https://www.powermag.com/duke-energy-reaches-1-1b-deal-to-resolve-north-carolina-coal-ash-cost-issues/) was reached where North Carolina Supreme Court's decision determined that utilities would not have to pay the full cost of recovery. Duke estimated its cleanup plan could cost $8-9 billion and as part of this agreement the utility has agreed to absorb $1.1 billion in cleanup costs anticipated between 2015 and 2030. The state's attorney general and public staff, along with environmentalists, opposed the utility's plan to recover costs, arguing that the utility should be held accountable for its past handling of the waste.

The court instead directed the utility, NCUC, to reexamine a proposal from public staff that would have ratepayers pay half the cleanup cost and shareholders pay the other half, extend the timeline for paying off those costs, and prevent the utility from profiting from the [cleanup plan](https://news.duke-energy.com/releases/duke-energy-north-carolina-regulators-and-environmentalists-reach-agreement-to-permanently-close-all-remaining-ash-basins-in-north-carolina).

###

###

### AES Power Plant, Puerto Rico

Before Hurricane Maria hit Puerto Rico in September 2017, there was a 12-story pile of coal ash adjacent to the island’s sole coal plant. This 454 MW coal-fired power plant is operated by multinational power company AES based in Virginia and churns out about [400,000 tons](https://earthjustice.org/blog/2020-february/in-the-fight-to-clean-up-coal-ash-these-states-are-making-progress) of coal ash every year.

In July 2017, the Puerto Rico legislature passed a law banning the disposal of coal ash in its landfills, which led AES to Augment the massive waste pile in Guayama. The law also prevents the ash from benign stored on the island for more than 180 days, which was considered a success by [some](https://earthjustice.org/blog/2020-february/in-the-fight-to-clean-up-coal-ash-these-states-are-making-progress). Here the coal ash pits contributed to unsafe levels of boron, lithium, molybdenum, selenium, and sulfate in groundwater, [according to a recent analysis](http://www.environmentalintegrity.org/wp-content/uploads/2019/04/National-Coal-Ash-Report-4.30.2019.pdf) by the Environmental Integrity Project.

Although this has been viewed as a success in Puerto Rico, the coal has been shipped to the JED landfill in the rural area of Osceola County in Florida, where it has been [controversial](https://www.motherjones.com/environment/2019/05/puerto-rico-got-rid-of-its-coal-ash-pits-now-the-company-responsible-is-moving-them-to-florida/). The landfill is taking the coal ash for $2/ton and it was estimated that about 200,000 arrived in 2019.

In early 2020, Puerto Rico Governor Wanda Vázquez Garced signed into law a [bill](https://earthjustice.org/blog/2020-february/in-the-fight-to-clean-up-coal-ash-these-states-are-making-progress) (PS 1221) that puts into place protections far exceeding the EPA coal ash rule. The law requires AES to remove its dangerous ash pile within six months and prohibits AES from ever storing coal ash at the plant for more than six months, unless the ash is placed in a tank or silo. In addition, no can be placed on land, roads, in landfills or in water in Puerto Rico.

### Superfund sites

Another route for coal ash remediation in the US has been designation as a Superfund site. Superfund sites are areas that require a long-term response to clean up hazardous material contamination. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) authorized the Environmental Protection Agency (EPA) to create a list of locations, which includes coal ash sites.

#### Chisman Creek

[Chisman Creek](https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0302756#bkground) is a coal ash Superfund site in York County, Virginia, that consists of three abandoned sand and gravel pits where over 500,000 tons of [coal combustion residuals (CCRs)](https://www.epa.gov/coalash/coal-ash-basics) from the Yorktown Power Generating Station were disposed from 1957 to 1974.

In 1980, in response to a homeowner complaint of discolored well water, the Virginia State Board of Health, the Virginia State Water Control Board, and the Virginia Institute of Marine Science sampled residential wells and surface water in the three disposal pit areas. The investigations found heavy metal contamination in Chisman Creek and the groundwater, sediments, surface water, and soils in and around the disposal pits. The EPA placed the Site on the Superfund National Priorities List (NPL) in 1983.

The remedy included extending public water lines to homes using residential wells in the immediate Site area; installing a low permeability cap and soil cap in the disposal pit areas; collecting contaminated groundwater and treating on-Site before discharging into the Chisman Creek non-tidal tributary; and initiating groundwater and surface water monitoring and institutional controls, including deed restrictions, to prevent contact with the CCRs and contaminated groundwater. Construction was completed in December 1988.﻿

Since then there have been multiple reviews of the site. The most recent [2016 Five-Year Review (PDF),](https://semspub.epa.gov/src/document/03/2240450) concluded that the remedies are currently protective of human health and the environment

#### The Pines Groundwater Plume

The [Pines Groundwater Plume](https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0508071#bkground) site is located about four miles west of Michigan City and about one mile south of Lake Michigan in Porter County, Indiana. EPA tested residential drinking water wells in the town of Pines in May 2002, based on high levels of the metals boron and molybdenum found in drinking water wells by the Indiana Department of Environmental Management. The metals appeared to come from coal combustion by-products, or CCBs, composed primarily of fly ash that was disposed of in a nearby landfill called Yard 520. Other areas in the town were also identified as having CCB materials, including residential yards where fly ash was used as fill material and roads where bottom ash was used as bedding and surface material. CCBs are the result of burning coal to make electricity.

Originally, the cleanup called for legal restrictions to prevent exposure to contaminated soil left in place (e.g. at depth). Landowners, however, may be unwilling to enter into a restrictive covenant or may refuse to allow EPA to clean up their properties. The ESD allows EPA, in these situations, to use different legal options to prevent exposures, such as informational deed notices or ordinances.

The changes are outlined in a new report called an [explanation of significant differences](https://semspub.epa.gov/work/05/953655.pdf) that includes: adding new institutional controls (deed restrictions or an ordinance); removing hexavalent chromium as a contaminant of concern; and clarifying the scope of the original soil cleanup.

## Coal Ash Remediation on Navajo Nation

### San Juan Generating Station

In 2017, Units 2 and 3 (369 and 555 MW, completed in 1976 and 1979, respectively) were retired. Units 1 and 4 (also 369 and 555 MW, completed in 1973 and 1982, respectively) are scheduled to shut down in 2022. Coal ash generated at the San Juan Generating Station (SJGS) is returned to the adjacent mines for use in reclamation, so this station does not have or utilize ash impoundments or landfills, and therefore there is no CCR compliance data. This also means that SJGS does not have the same compliance rules for data, public meetings etc, as those coal plants that fall under the CCR Rule.

In July 2019, PNM submitted its closure [plan](https://www.knau.org/post/plan-submitted-closure-four-corners-region-coal-power-plant-0) for SJGS. As part of the Energy Transition Act (ETA), PNM will bond: $19.2 million to decommission the power plant, $283 million to refinance past investments into the plant; $9.4 million for reclamation at the San Juan Mine; $20 million for job training for power plant and mine employees; $5.9 million for economic diversification in local communities; $12.1 million for displaced workers and $1.8 million for the New Mexico Indian Affairs Department. Remediation discussions are ongoing, but PNM has included the option of fencing off the plant and walking away.

### Four Corners Power Plant

The units at the Four Corners Power Plant (FCPP) that fall under the CCR Rule compliance are the Lined Ash Impoundment, Lined Decant Water Pond, and Upper Retention Sump. The two other units- the Combined Waste Treatment Pond, and Dry Fly Ash Disposal Area, are not. They have different inspections and plans for each of the units, and the most recent facility- wide groundwater monitoring compliance report is [here](https://drive.google.com/file/d/1HZeiL8bPo_fqSWOQhdR9X3cUg5zBPE_9/view?usp=sharing). FCPP Closure Plan can be found [here](https://www.aps.com/en/Utility/Regulatory-and-Legal/Environmental-Compliance). There is not currently a public comment or public meeting date on the operator website.

 In January 2020, Arizona Public Service announced it would be decommissioning the Four Corners Generating Station ahead of schedule by the end of 2031, instead of waiting until 2038. APS is the primary owner but in January 2021, PNM [filed](https://www.daily-times.com/story/news/2021/01/12/pnm-files-application-abandon-its-share-four-corners-power-plant/6640641002/) with the NMPRC to transfer its 13% ownership, which could alter closure plans. All CCRs disposed prior to the 2015 CCR Rule in “closed” on-site wet impoundments have been abandoned in place, with only minimal engineering controls installed to limit the generation and escape of groundwater contamination from those units. APS has repeatedly stated their intent to close in place some active CCR units.

### Navajo Generating Station

Navajo Generating Station (NGS) was a 2.25-gigawatt coal-fired power plant that closed in November, 2019. The KMC is the sole source of coal buried at NGS, and NGS was the sole user of KMC coal. Most of the coal ash produced by NGS was disposed of 1.5 miles east of the plant at a dedicated landfill totaling 765 acres.

The one unit at NGS- the ash landfill falls under the CCR Rule but has different regulations since this unit is a landfill, not surface impoundment. SRP claims that over 90% of the decommissioned plant will be [recycled](https://srpnet.com/about/stations/ngs/investment-recovery.aspx). The most recent closure plan is [here](https://www.federalregister.gov/documents/2021/03/16/2021-04352/rescission-of-the-source-specific-federal-implementation-plan-for-navajo-generating-station-navajo) with a public comment date that ends April 15, 2021.

### Cholla Power Plant

Cholla power plant is a 767 MW coal plant operated by APS and Pacificorp that began operations 1962. Unit 2 was retired in 2016, Unit 4 is scheduled to retire at the end of 2020, and Units 1 and 3 are scheduled to retire in 2025. Coal burned at the plant was previously sourced from the McKinley Mine in New Mexico. When the McKinley Mine closed in 2009, the source of coal switched to the Lee Ranch and El Segundo mines near Grants, New Mexico.

All of the Cholla Closure plan data can be found [here](https://www.aps.com/en/Utility/Regulatory-and-Legal/Environmental-Compliance#Cholla). The most recent remediation [plan](https://drive.google.com/file/d/1ZIqY1oBXQJGi1-Rz0LF2lKBzZAQXN5gA/view?usp=sharing) is the January 2021 Annual Groundwater Monitoring and Corrective Action Report for 2020.

There is not currently a public comment or public meeting date on the operator website.

### Escalante

Escalante Power Plant was a 253 MW coal-fired generating station that closed it’s sole unit, Unit 1 in November, 2020. It was served by the El Segundo mine. Escalante power plant contains one unit that is a CCR landfill, but not surface impoundment.

The most recent inspection report from January 2021 can be found [here](https://tristate.coop/sites/tristategt/files/PDF/Environment/210115%20PEGS%20CCR%2C%202020%20Annual%20Landfill%20Inspection.pdf). The post closure report from 2016 can be found [here](https://tristate.coop/sites/tristate/files/PDF/Environment/161014-EscalanteCCR-PostClosurePlan.pdf). There is no comment period listed on their website.