CHOLLA POWER PLANT ANNUAL CCR DUST PLAN REPORT §257.80(c) SITEWIDE CH_DustAnRpt_20211213

December 13, 2021

Re: Annual CCR Fugitive Dust Control Report – Cholla Power Plant, Joseph City, AZ

Arizona Public Service (APS) submits the following Annual CCR (Coal Combustion Residuals) Fugitive Dust Control Report as per 40 CFR Part 257.80. This report contains a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. A periodic review of the dust control plan and an assessment of effectiveness of the dust control plan were also performed on December 6, 2021. The results of the review and assessment are summarized in this report.

CCR Dust Activities and Control Measures

Activity	,	Control Measure(s)
1.	Bottom ash material screening and	This is a wet process performed in the boundary of
	stacking from Salt River Materials Group	the CCR surface impoundment.
	(SRMG) screening operation	
2.	Removal of raw bottom ash from pond for	Bottom ash is wet as it is removed from pond in
	sale as beneficial re-use.	small amounts and allowed to dewater prior to
		loading onto trucks for transport offsite.
3.	Loading bottom ash material to haul trucks	Bottom ash shall have sufficient moisture content
		to minimize emissions.
4.	Movement of bottom ash to Bottom Ash	Bottom ash shall have sufficient moisture content
	Monofill from Bottom Ash Pond	to minimize emissions but will not have any free
		liquids. CCR material is covered with soil prior to
		CCR material becoming dry.
5.	Collecting bottom ash from boilers and	This is a wet process and pipelines are enclosed.
	transport to ponds via pipeline	
6.	Removing bottom ash from boilers	Bottom ash removed from the boiler is saturated.
	manually during breakdown of bottom ash	The material is dewatered in a contained
	removal system	environment until no free liquid remains but will
	·	have sufficient moisture remaining to minimize
		emissions and then is transported to the Bottom
		Ash Pond.
7.	Collection and disposal of ash from	Ash (bottom and/or fly ash) is occasionally
	economizer hoppers	collected from economizer hoppers with the use of
		a commercial vacuum truck equipped with a filter
	Donas Hasting and top good of the sale to	type collection system.
8.	Dry collection and transport of fly ash to	This is an enclosed system vented through fabric
	SRMG or wet disposal system via pipeline	filters.
9.	Fly ash wet disposal system mixing tank	Dry fly ash is injected into a tank filled with waste
		lime slurry and / or water to form a wet mixture.

10. Dry fly ash collection system maintenance11. Conditioning and loading fly ash for beneficial reuse by SRMG	Fly ash is either vacuumed out of equipment to facilitate maintenance or water sprays are used to minimize emissions during maintenance of the fly ash collection system. Fabric filters are used on equipment that conditions and loads fly ash for beneficial re-use.
12. Excavation of Former Ash Pond 1	Ash is excavated and hauled from the historic/closed Ash Pond 1 to the Fly Ash Pond footprint for beneficial use staging during the eventual Fly Ash Pond closure. The excavation sites are watered. CCR is transported in trucks with a tarp covering. Unpaved roads are maintained with dust suppressants.
13. Replacement of fabric filter bags	Fabric filter bags are either bagged in plastic bags at the point of generation or dropped to ground level using an enclosed tube and placed into a roll off dumpster, covered, and transported offsite for disposal.
14.	
15. Transport of flue gas desulfurization waste to the Fly Ash Pond for disposal	This flue gas desulfurization waste remains wet through the process.
16. General Housekeeping	Spilled, leaked, and/or deposited CCR within the facility are removed by either vacuum truck or moisture treatment and removal.

Citizen Complaints

There were no citizen complaints during the reporting period of December 11, 2020, through the date of this report.

Summary of Corrective Actions Taken

No corrective actions were taken or warranted during this reporting period.

Summary of Review of the Dust Control Plan

There was one change to operations that required a change to the CCR Dust Control Plan. The Sedimentation Pond has been closed and a Sedimentation Tank has been installed. There is no CCR material transfer resulting in fugitive dust, therefore Section 3 of the Dust Control Plan has been modified to remove the Sedimentation Pond from the monthly visual inspections. Additionally, Activity 14 of Appendix A was removed because the Sedimentation Pond has been permanently closed. There were no CCR corrective actions that were needed to improve the effectiveness of the Dust Control Plan.

Summary of Assessment of Effectiveness

There were no incidences that would require a revision to the control measures. The adopted measures were effective in minimizing CCR from becoming airborne at the facility. Based on review of available records, the facility-maintained compliance with the CCR Dust Control Plan.