FOUR CORNERS POWER PLANT
ANNUAL CCR DUST PLAN REPORT §257.80(c)
SITEWIDE
FC_DustAnRpt_20191205

December 5, 2019

Re: Annual CCR Fugitive Dust Control Report – Four Corners Power Plant, Fruitland, NM

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 5, 2019. The results of the review and assessment are summarized in this letter as well.

CCR Dust Activities and Control Measures

Activity	Control Measure(s)
1. Dry collection and transport of fly ash to Salt River Materials Group (SRMG) or wet disposal system via pipeline	This is an enclosed system vented through fabric filters.
2. Transporting fly ash (FA) to Dry Fly Ash Disposal Area (DFADA)	Fly ash is moisture conditioned, mixed with water or process liquid in pug mills, loaded into trucks and hauled and stacked on the DFADA.
3. Fly ash and bottom ash stacking and storage on the DFADA	Fly ash and bottom ash is stacked on the DFADA in a layer and compacted. The material is moisture conditioned with water, and or dust suppressant is applied as necessary.
4. Dry fly ash collection system maintenance	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.
5. Conditioning and loading fly ash for beneficial reuse by SRMG	Fabric filters are used on equipment that conditions and loads fly ash for beneficial re-use.
6. 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 DFADA for disposal.
7. Collecting bottom ash from boilers and transport to hydrobins via pipeline	This is a wet process and pipelines are enclosed.
8. Collection and disposal of ash from economizer hoppers	Ash (bottom and/or fly ash) is occasionally collected from economizer hoppers with the use of a commercial vacuum truck equipped with a filter type collection system and transported to the DFADA.
9. Loading bottom ash material to haul trucks	Bottom ash shall have sufficient moisture content to minimize emissions.

10. Movement of bottom ash to DFADAs from Units 4&5 hydrobins.	Bottom ash shall have sufficient moisture content to minimize emissions but will not have any free liquids. Dust suppressant is applied to CCR material as necessary.
11. Transporting Bottom Ash to DFADA.	The material is dewatered in a contained environment until no free liquid remains but will have sufficient moisture remaining to minimize emissions and limiting speed when in transport to the DFADA.
12. Removing bottom ash from boilers manually during breakdown of bottom ash removal system	Bottom ash removed from the boiler is saturated. The material is dewatered in a contained environment until no free liquid remains but will have sufficient moisture remaining to minimize emissions and then is transported to the DFADA or provided for beneficial use in construction and/or roadways.
13. Transport of flue gas desulfurization waste to the Lined Ash Impoundment (LAI)	The flue gas desulfurization is slurried via pipeline and slurry ditch to the LAI.
14. The Particulate flow path from units to baghouse, collection & storage, FA removal, transport & disposal systems	This is a dry process and pipelines are enclosed.
15. Removal of raw bottom ash from Combine Waste Treatment Pond	Bottom Ash is removed wet, allowed to dewater, then transported to DFADA for disposal. The material is transported while sufficient moisture remains to minimize emissions.
16. Unpaved Roads Construction with CCR Materials	Roads were stabilized by application of water and enforcement of limits to ensure reduce vehicle speed.
17. General Housekeeping	Spilled, leaked, and/or deposited CCR within the facility are removed.

Citizen Complaints

There were no citizen complaints during the reporting period of December 7, 2018 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 were no changes to the operation that would require a change to the CCR Dust Control Plan. There were two typographical corrections. First, the document reference number in the header was corrected. Second, in Appendix A: List of CCR Related Activities at Four Corners Generating Station, the 17th activity, General Housekeeping, was inadvertently removed, therefore it was put back into the list in Appendix A. 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. The Dust Control Inspection Form, completed on a monthly basis, was modified to differentiate between CCR requirements and other applicable requirements. Based on review of available records, the facility maintained compliance with the CCR Dust Control Plan.