FOUR CORNERS POWER PLANT ANNUAL CCR DUST PLAN REPORT \$257.80(c) SITEWIDE FC_DustAnRpt_20211213

December 13, 2021

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 11, 2020. 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	This is an enclosed system vented through fabric
Salt River Materials Group (SRMG) or wet	filters.
disposal system via pipeline	
2. Transporting fly ash (FA) to Dry Fly Ash	Fly ash is moisture conditioned, mixed with water or
Disposal Area (DFADA)	process liquid and or wet FGD sludge in pug mills,
	loaded into trucks and hauled and stacked on the
2 Fl 1 1 1 1 1 1 FGD 1 1	DFADA.
3. Fly ash, bottom ash, and FGD sludge	Fly ash, bottom ash, and FGD sludge is stacked on
stacking and storage on the DFADA	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
4. Dry my asir concetion system maintenance	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	Fabric filters are used on equipment that conditions
beneficial reuse by SRMG	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	This is a wet process and pipelines are enclosed.
transport to hydrobins via pipeline	
8. Collection and disposal of ash from	Ash (bottom and/or fly ash) is occasionally collected
economizer hoppers	from economizer hoppers with the use of a
	commercial vacuum truck equipped with a filter
	type collection system and transported to the DFADA.
0 I goding bottom ash material to have trustee	Bottom ash shall have sufficient moisture content to
9. Loading bottom ash material to haul trucks	minimize emissions.
	minimize chiissions.

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.
13. The Particulate flow path from units to baghouse, collection & storage, FA removal, transport & disposal systems	This is a dry process and pipelines are enclosed.
14. 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.
15. Unpaved Roads Construction with CCR Materials	Roads were stabilized by application of water and enforcement of limits to ensure reduce vehicle speed.
16. 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 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 were no changes to the operation that would require a change to Sections 1, 2, or 3 of the CCR Dust Control Plan. However, transportation of flue gas desulfurization waste to the LAI has permanently ceased, therefore Activity #13 has been removed from Appendix A of the CCR Dust Control Plan. There were no CCR corrective actions that were needed to improve the effectiveness of the Dust Control Plan.

The facility is in the process of modifying its operations in accordance with the CCR Rule. These modifications will ultimately result in the closure of CCR management units (CWTP, LAI and LDWP). The full effect of these changes is expected to manifest in 2025.

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.