CHOLLA POWER PLANT
ANNUAL CCR DUST PLAN REPORT §257.80(c)
SITEWIDE
CH_DustAnRpt_20201211

December 11, 2020

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 11, 2020. 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 stacking from Salt River Materials Group (SRMG) screening operation	This is a wet process performed in the boundary of the CCR surface impoundment.
2. Removal of raw bottom ash from pond for sale as beneficial re use.	Bottom ash is wet as it is removed from pond in 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 Monofill from Bottom Ash Pond	Bottom ash shall have sufficient moisture content 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 transport to ponds via pipeline	This is a wet process and pipelines are enclosed.
6. 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 Bottom Ash Pond.
7. 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.
8. Dry collection and transport of fly ash to SRMG or wet disposal system via pipeline	This is an enclosed system vented through fabric 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 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.
11. 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.
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. Closure of Sedimentation Pond and removal of solids	Solids containing CCR are removed wet, allowed to dewater, then transported to either the Bottom Ash Pond or Bottom Ash Monofill for disposal. The material is transported while sufficient moisture remains to minimize emissions. Water sprays are utilized during Sedimentation Pond closure related construction activities.
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 two citizen complaints during the reporting period of December 5, 2019 (date of last report) through the date of this report. The complaints have been logged and are listed below.

1. August 5, 2020 – Dust generated from Ash Pond 1 activity
2. October 15, 2020 – Dust from haul road

Summary of Corrective Actions Taken

The corrective actions taken during this reporting period are listed below.

Date	Concern	Corrective Action(s)
08/05/20	Dust generated from AP1 activity	Pre-wet system will be installed to spray area continuously when excavating Contractor will dedicate a water truck with a cannon to spray stockpiles and roads until pre-wet system is functional.
10/15/20	Dust from haul road	Added aggregate base material to road Increased water deposition on road for dust control

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 no CCR corrective actions that were needed to improve the effectiveness of the Dust Control Plan. There were three changes to Appendix A: List of CCR Related Activities at Cholla Generating Station of the CCR Dust Control Plan. First, "Excavation of Former Ash Pond 1" was added as an activity along with the associated control measures. The control measures are consistent with Section 2 of the Cholla CCR Dust Control Plan. Second, the control measures for activity 7 was modified by removing the last sentence. Due the closure of the sedimentation pond disposal of fly ash in the sedimentation pond does not occur. Third, activity 14 was modified to include the closure of the sedimentation pond. Lastly, General Housekeeping was added as activity 16 along with the associated control measures. The control measures are consistent with Section 2 of the Cholla CCR 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.