

Apache Generating Station

Combustion Waste Disposal Facility

CCR Fugitive Dust Control Plan

DUST SUPPRESSION ON ROADS

The Combustion Waste Disposal (CWDF) access roads are paved with aggregate base course (crushed rock). Traffic speed is limited to 15 mph or less on these roads to minimize fugitive dust emissions. These roads will be sprayed with water trucks should dusting become excessive.

DUST SUPPRESSION ON ASHPONDS

Fly ash and bottom ash is the material remaining from burning coal for electric power generation. The ash is pumped wet to the CWDF in enclosed pipes. Pond water levels are maintained such that the ash is kept wet at all times. This precludes generation of ash fugitive dust emissions.

Water trucks will be used for dust control if dusting becomes excessive.

DUST SUPPRESSION ON SCRUBBER PONDS

Scrubber sludge is the material remaining from the Flue Gas Desulfurization (FGD) system which controls sulfur dioxide emissions and reduces acid rain. The scrubber sludge is essentially gypsum similar to what is used to make drywall board.

The scrubber sludge is pumped wet to the CWDF in enclosed pipes. Scrubber Pond 2 water levels are maintained such that the scrubber sludge is kept wet at all times. This precludes generation of scrubber sludge fugitive dust emissions.

Scrubber Pond 1 is "closed". This pond no longer receives scrubber sludge or other CCR. The pond has been dewatered. The scrubber sludge in this pond naturally develops a hard crust which, when left undisturbed, prevents fugitive dust emissions.

Water trucks will be used for dust control if dusting becomes excessive.

MONITORING

Visual airborne dust monitoring is ongoing at the CWDF. AEPSCO personnel (including Security, Operations, Maintenance Environmental and Engineering) are routinely present at the CWDF on a daily basis.

The Fuel & Limestone Quality Manager is responsible for dust control at the site. Personnel onsite are directed to notify the Fuel & Limestone Quality Manager for visual observation of dust which requires

immediate attention. Normal dust suppression is accomplished via a water truck.

Opacity of emissions from any fugitive dust non-point source shall not be greater than 40% measured, or 20% for point sources, in accordance with the Arizona Testing Manual, Reference Method 9.

A certified Method 9 observer shall conduct a monthly visual survey of visible fugitive dust emissions from the ponds. A record of the name of the observer, date and location on which the observation was made and the results of the observation. Additional visual surveys will be completed as needed when fugitive dust is reported. If the observer sees a visible emission from a fugitive dust source that on an instantaneous basis appears to exceed applicable opacity standard, then the observer shall, if practicable, take a six-minute Method 9 observation of the visible emission.

If the six-minute opacity of the visible emission is less than or equal to applicable opacity standard, the observer shall make a record of the location, date, and time of the observation; and the results of the Method 9 observation.

If the six-minute opacity of the visible emission exceeds applicable opacity standard, then Plant staff will apply water to the road, ash or scrubber sludge to reduce opacity to below the applicable opacity standard.

CERTIFICATION

I certify that this Fugitive Dust Control Plan meets the requirements of 40 CFR 257.80 Air Criteria in Subpart D, Standards of Coal Combustion Residuals in Landfills and Impoundments.

A circular professional engineer seal for Charles S. Reece IV, Arizona P.E. 27208. The seal contains the text "Registered Professional Engineer", "CERTIFICATE NO. 27208", "CHARLES S. REECE IV", "Date Signed 11/25/15", and "ARIZONA U.S.A. Expires 6-30-17". A handwritten signature "Charles S. Reece IV" is written across the seal.

Charles S. Reece IV, Arizona P.E. 27208
November 25, 2015
Revision 1