Section 1

Cover Letter

Four Corners
Power Plant
P.O. Box 355
Fruitland, NM 87416

February 15, 2013

CERTIFIED MAIL

Mr. David Smith, Manager
NPDES Permits Office, WTR-5
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

RE: NPDES Permit Renewal Application NN0000019; By EPA's Request

Dear Mr. Smith:

Arizona Public Service Company (APS), Four Corners Steam Electric Station is providing a second renewal application at the request of the Environmental Protection Agency (EPA), because of the time elapsed for the first application renewal. EPA requested a full application to be provided per 40 CFR Part 122 and a discussion of the impacts for the closure of Units 1, 2, and 3. This submittal provides the permit renewal application and information requested by EPA.

The current NPDES permit for the Four Corners Power Plant became effective on April 7, 2001, and has been administratively extended from the expiration date of April 6, 2006. APS is applying for authorization to continue discharging from the following Outfalls until permit renewal is granted:

001-A Cooling Pond Discharge commonly known as Morgan lake Blow Down
to unnamed wash tributary to Chaco Wash

Internal Outfalls:

01A-A Condenser Cooling Water Discharge
01E-A Combined Waste Treatment Pond Discharge
01B-A Chemical Metal Cleaning Wastewater Discharge

APS has enclosed a copy of the present Four Corners Power Plant Permit, to assure your files are complete. APS has also included as part of the renewal application a discussion of the impacts when they occur in the future for the closure of Units 1, 2, and 3.

ADDITIONAL INFORMATION/REQUESTS

Analytical data for 01B-A is not included in Form 2C. The Outfall 01B-A, Chemical Metal Cleaning Wastewater, is not presently being used. Four Corners currently co-disposes chemical metal cleaning wastewater with fly ash and scrubber sludge, as allowed by the RCRA Dietrich exemption (Bevill Amendment). This Outfall must be retained, however, in case the ability to co-dispose with coal combustion byproducts is eliminated by future rulemaking. Recent analytical data is not available for chemical metal cleaning wastewater because the boilers are chemically cleaned infrequently. Since this wastewater would require treatment before discharge, samples of the raw wastewater would not be meaningful.

The analytical data for 001 is not entirely complete. There are a few parameters that are still being analyzed. Updated sheets with those parameters will be submitted once we have received the results.

APS requests EPA's consideration in using EPA Method 330.5 for the determination of the total residual chlorine instead of the amperometric methods currently being used. We make this request due to the difficulty of getting a sample and then returning to lab for analysis, due to the distance and new Homeland security measures put in place.

APS is requesting that EPA allow the continued annual Toxicity monitoring as presently allowed in the facility's NPDES permit reduced sampling option. The sampling and analysis have indicated no impact from our industrial activity on a regular basis.

APS would like to request the use of grab temperature monitoring at 001-A, Morgan Lake Blow Down, during cool months due to the potential malfunction of the continuous monitor. Lake water does not change significantly over short intervals and is several degrees below the maximum allowable limit in the permit during these months.

APS would like to take this opportunity to indicate that it is our opinion that Morgan Lake meets the definition in the Steam Electric Standards as a Re-circulating Closed Cycle Cooling Water system (40 CFR423.11(h)).

DISCUSSION OF THE IMPACTS FOR THE CLOSURE OF UNITS 1, 2, and 3

A detailed list reflecting impacts of Unit 1-2-3 is in Section 14 of the permit renewal application. The closure of Units 1-2-3 would reduce the cooling water flow circulation by about 30%. Some chemical additions would stop and some eliminated at the plant because of use on these units only. The wastewater slurry for flyash and scrubber sludge would decrease by about 30% to the lined ash pond. The wet handling of coal combustion residues on Units 1-2-3 would cease, except for clean up during decommissioning. A 30% water use reduction for these units may be observed too. Chemical cleaning of the boilers and resulting waste would discontinue on a 5-7 year cycle.

If you have any questions concerning this application, please contact Carl Woolfolk, Section Leader Environmental at (505) 598-8459. APS requests the opportunity to work with you on any modifications that may be made to the permit.

Sincerely,

David C Bloomfield

David C. Bloomfield
Four Corners Site Manager

CDW/DAY/jmd

Enclosures

cc: Patrick Antonio NNEPA