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**Ramboll Americas Engineering Solutions, Inc.**

# ANNUAL COAL COMBUSTION RESIDUALS FUGITIVE DUST CONTROL REPORT

## AES PUERTO RICO, LP

## KM 142.0, STATE ROAD PR-3, GUAYAMA, PR 00784

Reporting Period: August 2022 to December 2023


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# 1. INTRODUCTION

Ramboll Americas Engineering Solutions, Inc. (Ramboll) was retained by AES Puerto Rico, LP (AES) to evaluate and document the actions taken by AES since the prior reporting period to control fugitive dust from AES' Coal Combustion Residuals (CCR) unit located at Km 142.0, State Road PR-3 in Guayama, Puerto Rico (the "site" or the "facility").

The objective of this evaluation was to document the actions taken by AES to control CCR fugitive dust, review records of all citizen complaints, and summarize any corrective measures taken in conformance with the CCR Rule Title 40 Part § 257.80(c) of the Code of Federal Regulations.

## 1.1 Scope

This annual report describes the condition of the fugitive dust control measures present at the AES facility, considering the results of visual inspections and actions taken during the reporting period (August 2022 to December 2023). The areas covered under this report include the CCR and Agremax™ handling activity areas at the facility. The CCR handling activity areas at the facility are:

- Bottom and fly ash storage silos,
- Pug mill,
- Truck feeding area,
- Elevated covered conveyors,
- Stockpile area,
- Truck transportation areas, and
- Marine dock.

# 2. FACILITY INFORMATION

The facility, a coal-fueled generation plant, is located in the south coast of Puerto Rico, approximately 3.4 miles southwest of downtown Guayama, at Km 142.0, State Road PR-3 in the municipality of Guayama, Puerto Rico.

The facility is a bituminous coal power plant with a total power generation capacity of 520 Megawatts that generates and sells electricity to LUMA Energy (the power company responsible for power distribution and power transmission in Puerto Rico).

## 2.1 CCR unit description

Fly ash and bottom ash are produced by the coal combustion process and stored in two elevated silos south of the facility's Power Block building. Agremax™ is a manufactured aggregate produced by AES using its own CCRs. Dry ashes (bottom ash and fly ash) are mixed in a pug mill that conditions this CCR to produce Agremax™ with enough moisture to prevent wind dispersal without producing free liquids, before feeding an enclosed belt conveyor that is used to transfer the mixture to an open Stockpile Area at the facility where it is also kept wet by the application of water sufficient to prevent dispersal by wind (without producing free liquids). A stockpile to store

the inventory of Agremax™ is formed by a bulldozer or by dump trucks that are loaded with Agremax™ by an excavator or front-end loader, and the trucks then place the Agremax™ onto a stockpile. The Stockpile Area is located in the southeast quadrant of the facility, south of the power plant and east-southeast of the site's limestone storage dome.

For final off-site disposal of Agremax™, the Agremax™ is fed by a bulldozer into a crusher located in the southwest side of the Stockpile Area. Subsequently, the crusher feeds an enclosed belt conveyor to transfer the Agremax™ to marine vessels in the AES dock area (approximately 0.7 miles southwest of the Stockpile Area) for shipment overseas.

### 2.1.1 Fugitive Dust Control Components of the CCR unit

The main equipment and structures used for controlling CCR fugitive dust emissions include: structural enclosures (i.e., covered conveyor belts), a water truck with rear spray nozzles and front water cannon, a broom sweeper, mobile water sprinkler guns, large water hoses, curved paved haul roads, and a fixed water spray nozzle system within an articulated telescoping spout at the drop/loading/shipping area in the AES marine dock/pier area.

# 3. DESCRIPTION OF ACTIONS TAKEN TO CONTROL CCR FUGITIVE DUST

During this reporting period, the Agremax™ Staging Area Liner Project was ongoing on the western and northern portions of the Agremax™ Stockpile Area. The equipment and structures used for controlling dust emissions were maintained in general good operational condition during the reporting period. When some equipment was out of service due to maintenance or repairs, contingency controls (e.g., additional wetting) were implemented to CCR fugitive dust control operations. Operational inspections were performed daily and weekly in order to evaluate the effectiveness of control measures. Inspections records did not show any significant non-conformance with the CCR and Agremax™ Dust Control Plan or significant problems with any of the other control measures implemented.

One training session was provided to CCR operations personnel during this reporting period to ensure that the dust control practices and CCR and Agremax™ Dust Control Plan requirements are understood and followed.

# 4. RECORD OF CITIZEN COMPLAINTS

No formal citizen complaints were received or reported during this period.

# 5. SUMMARY OF CORRECTIVE ACTIONS TAKEN

Routine maintenance and operation of controls was ongoing throughout the reporting period. Significant corrective actions were not required.