



Annual CCR Fugitive Dust Control Report



Reporting period:

August 1, 2015 to October 1, 2016

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1.0 Background, information and areas covered under this report

Part 257.80 of the Code of Federal Regulation establish that the owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes 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.¹

This annual report describes the condition of the fugitive dust control measures present at the facility, taking into account the results of visual inspections and actions taken during the reporting period.² The areas covered under this report include the coal combustion residuals and Agremax™ handling activity areas at the AES Puerto Rico facility. The CCR handling activity areas at the facility are:

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

The main equipment and structures used for controlling dust emissions include a water truck with rear spray nozzles and front water cannon, a broom sweeper, mobile water sprinkler guns, large water hoses, fixed water spray nozzle systems / articulated telescoping spouts at drop and loading / shipping areas, a truck wheel cleaning station and curved paved haul roads.

¹ AES Puerto Rico's temporary storage of its inventory of manufactured aggregate is not a CCR unit subject to the CCR Rule, 40 C.F.R. Part 257. Nonetheless, as a protective measure, AES Puerto Rico has taken steps to satisfy CCR Rule requirements. By undertaking these measures, AES Puerto Rico does not admit its facility is covered by the CCR Rule and expressly preserves all rights and defenses.

² AES Puerto Rico has been implementing these measures during the reporting period under Administrative Order on Consent, Docket No. CWA-02-2015-3102 with U.S. EPA Region 2.

2.0 Description of Actions Taken

AES Puerto Rico has implemented a Standard Operating Procedure (SOP) that contains actions to prevent and control CCR fugitive dust emissions. During this period all control equipment including the water truck, sweeper, sprinklers and hoses, were maintained in good operational condition. Operational inspections were performed on a daily basis in order to evaluate the effectiveness of control measures. Inspections records did not show any non-conformance with the SOP or deficiencies in any of the control measures implemented.

Training was provided to the CCR operations personnel during this period to ensure that the dust control practices and SOP requirements are followed.

In addition to the actions taken, steel doors were installed at the truck feeding area in order to keep the area enclosed during operations.

3.0 Record of Citizen Complaints

No citizen complaints were received or reported during this period.

4.0 Summary of Corrective Measures Taken

Corrective actions have been completed, documented and kept in the facility operating record with the Coal Combustion Residuals and Agremax Dust Control Plan SOP. In summary, corrective actions generated during this period were all related to routine vehicle maintenance. This includes replacement of normal wear and tear parts of the truck sweeper and water truck due to its extensive use. As a corrective action, an external water truck was rented during the period in which the plant water truck was placed out of service for maintenance. Also, the frequency of use of the water truck was increased during the truck sweeper's maintenance periods.