AES/EPA -005

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March 25, 2015

Chief, Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
48 RD. 165 Km. 1.2
Guaynabo, Puerto Rico 00968-8069

RE: Administrative Order on Consent Docket Number CWA-02-2015-3102 – Compliance with AOC Section VII, ¶70

Dear Jose:

On March 18, 2015 AES Puerto Rico LP ("AES-PR") and the United States Environmental Protection Agency ("EPA") entered into the above referenced Administrative Order on Consent ("AOC"), under which AES-PR is obligated to comply with certain requirements (AOC Section VII, Ordered Provisions). All capitalized terms in this letter shall have the meaning as defined in the AOC.

Under AOC Section VII ¶70, within thirty (30) calendar days of the Effective Date of this Order, Respondent shall submit a detailed report concerning the implementation of each of the action items included in the BMPs Matrix table and schedule, which EPA approved in its May 5, 2013 letter. Respondent shall supplement this information with documentation, which shall include at a minimum, photo-documentation and an updated BMPs Matrix table.

In compliance with the new AOC requirement, AES-PR hereby submits the required Updated BMP Matrix and detailed report as attachments to this letter.

Please note that AES-PR is submitting these forms four days after signing the AOC, well in advance of the required deadline. We respectfully ask EPA to advise AES-PR promptly, should the agency have any concerns with this submission. Should AES-PR not receive any timely comments from EPA, we will reasonably consider that EPA has agreed that AES-PR has satisfied this requirement of AOC Section VII, ¶70 in full. Should EPA require additional time to review and provide comments back to AES-PR, that review time is of course entirely beyond the control of AES-PR and should be added to the required time frame for AES-PR to comply with this requirement.

Regards,

Manuel Mata
President AES Puerto Rico
Attachments

Administrative Order on Consent
AES Puerto Rico Coal Fired Power Plant
Docket Number CWA-02-2015-3102
NPDES Tracking Number PRU020663

Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Manuel Mata
President AES Puerto Rico

3/25/2015
Date

Appendix 1

Administrative Order on Consent
AES-PR Coal Fired Power Plant
Docket Number CWA-02-2015-3102

BMP Matrix Table

Action No.	Subbasin ID	Originator	Observation	Action Taken	Structural	Non structural	Completed	Estimated Date of Completion
1	Sub basain 11	EPA	Non-storm water stream. Condensate from Vapor line.	Vapor transmission line has been put out of service and capped.		X	X	Already Implemented
2	Multiple	EPA	Settleable solids in concrete channel	Periodic visual inspection of concrete conveyance channels		X	X	Already Implemented
3	Multiple	EPA	Settleable solids in concrete channel	Ash loading operations control by means of securely fastening tarps on trucks before departure		X	X	Already Implemented
4	Multiple	EPA	Settleable solids in concrete channel	Establish Inspection Protocol for Ash loading operations vehicules		X	X	Already Implemented
5	Multiple	EPA	Settleable solids in concrete channel	Establish Maintenance and Inspection Protocol to carry out periodic street sweeping		X	X	Already Implemented
6	Multiple	EPA	Settleable solids in concrete channel	Ash loading operations control by means of water sprinking of trucks		X	X	Already Implemented
7	Multiple	EPA	Settleable solids in concrete channel	Gabion was installed along the Agremax pile, 10 feet of clean space is kept between the gabion and the agremax pile	X		X	Already Implemented
8	Multiple	EPA	Settleable solids in concrete channel	Established Maintenance and Inspection Protocol for Temporary silt fences		X	X	Already Implemented
9	Multiple	EPA	Settleable solids in concrete channel	Low wall was installed along the concerned area, cleaning was assigned to CCP area	X		X	Already Implemented
10	Multiple	EPA	Settleable solids in concrete channel	Area was divided by berm and areas were assigned CCP and MH		X	X	Already Implemented
11	Sub basin 23	EPA	Settleable solids in concrete channel	Heavy Equipment washing area was built	X		X	Already Implemented
12	Sub basin 23	EPA	Settleable solids in concrete channel	Washing and inspection protocol was established in SWPPP		X	X	Already Implemented
13	Multiple	EPA	Off site tracking of sediments	Inspection protocol was established, dust suppression system was upgraded		X	X	Already Implemented
14	Multiple	EPA	Off site tracking of sediments	Dust suppression system was upgraded for the Agremax pile. The agremax pile and the coal pile are active piles. Tire Washing station was also implemented		X	X	Already Implemented
15	Multiple	EPA	Off site tracking of sediments	As described on action No. 6 through 14 as well as silt fence was installed	X	X	X	Already Implemented
16	Sub basin 17A	EPA	Lack of soil stabilization near vehicle maintenance shop	Soil was stabilized by placing gravel on all exposed ground including the surroundings of the vehicle maintenance shop	X		X	Already Implemented
17	Sub basin 23	EPA	Process wastewater from Aggremax preparation area into coal pile runoff pond collection system	Level sensor and submersible pump system was installed to prevent overflow. Wall installed to prevent overflow. The accumulated water is pumped to theconcrete channel in controlled manner		X	X	Already Implemented
18	Sub basin 3	EPA	Chemical Containers/vessels without secondary containment in proximity of storm water catch basin/drain. Catch basin with out inlet protection. Process wastewater entering storm water catch basin.	Permanent chemical unloading facility was built along with the required secondary containment.	X		X	Already Implemented
19	Sub basin 3	EPA	Chemical Containers/vessels without secondary containment in proximity of storm water catch basin/drain. Catch basin with out inlet protection. Process wastewater entering storm water catch basin.	Inspection protocol was included in the SWPPP and are assigned Operations		X	X	Already Implemented
20	Sub basin 3	EPA	Chemical Containers/vessels without secondary containment in proximity of storm water catch basin/drain. Catch basin with out inlet protection. Process wastewater entering storm water catch basin.	Drain guards were installed	X		X	Already Implemented
21	Sub basin 3	EPA	Chemical Containers/vessels without secondary containment in proximity of storm water catch basin/drain. Catch basin with out inlet protection. Process wastewater entering storm water catch basin.	Filter inspection and maintenance are included in the SWPPP		X	X	Already Implemented
22	Sub basin 3	EPA	Chemical Containers/vessels without secondary containment in proximity of storm water catch basin/drain. Catch basin with out inlet protection. Process wastewater entering storm water catch basin.	Low wall was constructed to protect the channel from chemical entering into this area.			X	Already Implemented
23	Sub basin 3	EPA	Chemical Containers/vessels without secondary containment in proximity of storm water catch basin/drain. Catch basin with out inlet protection. Process wastewater entering storm water catch basin.	Chemical containers stored in secondary containment areas, waste containers are covered with roll on and off covers.			X	Already Implemented
24	Sub basin 16 A	EPA	Water inside the offsite storm water diversion system during dry weather.Potential sources are groundwater and cooling tower spills/mist	Certification of groundwater presence through water sampling and inspection where concrete fissure infiltration was visible. We also built a secondary containment to prevent any spills from occuring.		X	X	Already Implemented
25	Sub basin 16 A	EPA	Water inside the offsite storm water diversion system during dry weather.Potential sources are groundwater and cooling tower spills/mist	Cooling Tower foaming control by means of anti-foaming agents		X	X	Already Implemented
26	Sub basin 16 A	EPA	Water inside the offsite storm water diversion system during dry weather.Potential sources are groundwater and cooling tower spills/mist	Establish Inspection Protocol for divising and clean-up of any foam splills		X	X	Already Implemented
27	Sub basin 16	EPA	Stormwater runoff from areas near cooling tower enters the off site storm water diversion system at this location. Velocity dissipation is not provided. Sediments and gravel observed	Wall was constructed and area was stabilized with gravel	X		X	Already Implemented
28	Multiple	EPA	Waste storage containers without cover and secondary containment for spills	Use of tarps for temporary coverage and lining. Elimination of scrap material and debris disposal sites where it could impact Stormwater Runoff. All Waste Storage containers have been outfitted with roll on and off covers.		X	X	Already Implemented
29	Multiple	EPA	Waste storage containers without cover and secondary containment for spills	Establish Maintenance and Inspection Protocol for coverage with tarps after waste depositing (SWPPP). All Waste Storage containers have been outfitted with roll on and off covers.	X		X	Already Implemented
30	Multiple	EPA	Waste storage containers without cover and secondary containment for spills	Roll on and off covers are installed on the waste bins	X		X	Already Implemented

Action No.	Subbasin ID	Originator	Observation	Action Taken	Structural	Non structural	Completed	Estimated Date of Completion
31	Sub basin 17A	EPA	Storage Areas exposed to stormwater	Extensive cleanup of the area was conducted, Housekeeping is regularly done and assigned in the SWPPP		X	X	Already Implemented
32	Sub basin 18	EPA	Backflow conditions at the off-site storm water diversion system	Canal is regularly cleaned, procedure is in the SWPPP	X		X	Already Implemented
33	Multiple	EPA	Lack of pile stabilization and erosion controls. Coal reaching conveyance concrete channel that discharges into coal pile runoff	As described on action No. 2 and 6 through 14	X	X	X	Already Implemented
34	Sub basin 20	EPA	Lack of pile stabilization and erosion controls. Coal reaching conveyance concrete channel that discharges into coal pile runoff	Cleaning of deposited material at Coal Pile entrance sediment trap		X		Already Implemented
35	Sub basin 20	EPA	Lack of pile stabilization and erosion controls. Coal reaching conveyance concrete channel that discharges into coal pile runoff	Established Maintenance and Inspection Protocol for sediment trap (done in SWPPP)		X		Already Implemented
36	Sub basin 16	EPA	Sedimentation in storm water pond	As described on action No. 2 and 6 through 12. Stormwater Pond was completely cleaned of any sediment and replaced the entire liner with new 60mil liner.	X	X	X	Already Implemented
37	Sub basin 16	EPA	Sedimentation in storm water pond	As described on action No. 20 through 21	X	X	X	Already Implemented
38	Sub basin 16	EPA	Sedimentation in storm water pond	The drian was cleaned.Drain Filters have been installed.		X	X	Already Implemented
39	Sub basin 17A	EPA	Exposed soil without erosion control and stabilization	Gravel stabilization was done	X		X	Already Implemented
40	Sub basin 17A	EPA	Exposed soil without erosion control and stabilization	Gravel stabilization was done	X		X	Already Implemented
41	Multiple	AES	Debris from landscape maintenance	Established Maintenance and Inspection Protocol for contractors or facility personnel must adhere to while maintaining the plants landscape		X	X	Already Implemented
42	Multiple	AES	Herbicide application	Established Maintenance and Inspection Protocol for contractors or facility personnel must adhere to while applying an EPA regulated herbicide		X	X	Already Implemented
43	Multiple	AES	Sediment accumulation in conveyance channels	As described on action No. 5	X		X	Already Implemented
44	Multiple	AES	Portolettes	Poroletts are anchored and inspected during site inspections		X	X	Already Implemented
45	Sub basin 5	AES	Storage of chemical containers/vessels without secondary containment and exposed to rainwater	Storage inside secondary containment areas of Water Treatment	X		X	Already Implemented
46	Sub basin 5	AES	Storage of chemical containers/vessels without secondary containment and exposed to rainwater	Establish Maintenance and Inspection Protocol for chemical containers integrity inspection	X		X	Already Implemented
47	Multiple	AES	Limestone storage exposed to rainwater	All of the limestone areas that were potentially exposed to rain have all been repaired.		X	X	Already Implemented
48	Multiple	AES	Conveyance system's missing protection panels	Panels are installed and regularly inspected	X		X	Already Implemented
49	Sub basin 15	UNIPRO	Northeast culvert entrace poor drainage	Area was modified, new catch basin was constructed		X	X	Already Implemented
50	Sub basin 1	UNIPRO	Crossing for heavy vehicles at Switchyard East entrance	Permanent crossing was constructed		X	X	Already Implemented
51	Multiple	UNIPRO	Erosion visible in channels due to overbank instability	Geotextile membranes were installed to control erosion		X	X	Already Implemented
52	Multiple	UNIPRO	Sedimentation control	Channels are regularly cleaned and sand bags are installed to facilitate sediment cleanup		X	X	Already Implemented
53	Sub basin 23	UNIPRO	Lack of loading area for diesel tanks	After further evaluation, the current unloading area is sufficient and meets all requirements.		X		Already Implemented
54	Sub basin 23	UNIPRO	Need for wheel washing areas for the Agremax yard	As described on action No. 11 and 12		X	X	Already Implemented
55	Sub basin 23	UNIPRO	South open channel crossing for heavy vehicles	Permanent crossing was constructed		X	X	Already Implemented
56	Sub basin 16	UNIPRO	Treatment plant run-off discharges	Designed and built secondary containment at the treatment plant		X	X	Already Implemented
57	Sub basin 16	UNIPRO	Uncovered sludge container	Use of tarps for coverage/ Stored in secondary containment	X		X	Already Implemented
58	Sub basin 16	UNIPRO	Uncovered sludge container	Established Maintenance and Inspection Protocol for coverage with tarps after sludge depositing (SWPPP), responsible areas are assigned.	X		X	Already Implemented
59	Sub basin 20	UNIPRO	Coal sediment trap	As described on action No. 34 and 35. It is Cleaned regularly and inspected as per the SWPPP.			X	Already Implemented
60	Sub basin 23	UNIPRO	Earth channel discharging process water into Coal Pile Runoff Pond instability	Earth Channel was eliminated, water is pumped to an existing concrete channel		X	X	Already Implemented
61		UNIPRO	Collapsed storm pipe	New bridge was constructed		X	X	Already Implemented
62	Off site	UNIPRO	Commingled waters from TAPI	A concrete wall was constructed to divide the channel and separate the waters from Tapi and AES		X	X	Already Implemented
63	Sub Basin 16A	UNIPRO	Cooling tower related streams reaching 100-yr offsite storm water management channel	Secondary Containment was built around the cooling tower		X	X	9/21/2015
64	Sub Basin 16A	UNIPRO	Cooling tower related streams reaching 100-yr offsite storm water management channel	Secondary Containment was built around the cooling tower	X		X	Already Implemented
65	Multiple	UNIPRO	Open channels headwalls poor structural integrity	New head wall was built		X	X	Already Implemented
66	Sub basin 15	UNIPRO	Incoming storm water from Chevron Phillips	Low wall was build along the side of Phillips		X	X	Already Implemented
67	Sub basin 20	UNIPRO	Coal ash runoff pond overflows	Coal pile runoff pond was completely dredged, sediment was removed, liner was replaced in several sections, various patches in required areas and the pond is maintained at the appropiate level. Per the H&H study the pond has the capacity to handle the required 100 year storm event, therefore a hydrulic control structure to aviod offsite runnoff is not necessary.		X	X	Already Implemented

Action No.	Subbasin ID	Originator	Observation	Action Taken	Structural	Non structural	Completed	Estimated Date of Completion
68	Sub basin 20	UNIPRO	Coal ash runoff pond overflows	Optimize pond volume by monitoring the sedimentation and clean as necessary.	X	X	X	Already Implemented
69	Sub basin 20	UNIPRO	Coal ash runoff pond overflows	SWPPP requires annual survey. Other actions as described in 67 & 68 above.	X		X	Already Implemented
70	Multiple	UNIPRO	AST spillage prevention controls and countermeasures plan	The required inspections for this action are uploaded into our maintenance system and assigned to the appropiate personnel	X		X	Already Implemented
71	Sub basin 15	UNIPRO	Exposed chemicals at facilities' Norteast side	Enclosure was installed over the chemicals to prevent any outside exposure.		X	X	Already Implemented
72	Sub basin 10	UNIPRO	Oil and grease traps possible overflows	Sensor and alarm system is installed to prevent overflow				Already Implemented
73	Sub basin 10	UNIPRO	Oil and grease traps possible overflows	PM Plan was created to inspect and clean on a as needed basis with the maintenance management system.	X		X	Already Implemented
74	Multiple	UNIPRO	Fugitive dust and material off tracking control	Traffic and speed signs have been installed to control the flow of traffic.	X		X	Already Implemented
75	Sub basin 16	UNIPRO	Airborne coal particle control needed at dust control building	Conveyor covers were corrected	X		X	Already Implemented
76	Sub basin 16	UNIPRO	Airborne coal particle control needed at coal crushing building	Dust control system has the appropiate sensors in place.	X		X	Already Implemented
77	Sub basin 16	UNIPRO	Wastestream control at coal crushing building	Building was sealed, BMP for cleaning was implemented.	X		X	Already Implemented
78	Sub basin 16	UNIPRO	Wastestream control at coal crushing building	BMP of using the Vacuum truck to extract the water during building washing has been implemented.		X	X	Already Implemented
79	Sub basin 20	UNIPRO	Overflows from ponds	Water used from the ponds are prioritized to prevent any potnetial overflow condition to occur.	X		X	Already Implemented
80	Sub basin 20	UNIPRO	Overflows from ponds	After further evaluation, the collection of rooftop and parking lot rainwater is currently diverted to the storm water runoff pond.		X	X	Already Implemented
81	Multiple	UNIPRO	On site stormwater exiting presmises	Changed the slope of the road to ensure that all water is collected in the exsisting trench and constructed a low wall for prevention of any water leaving the site from this location.		X	X	Already Implemented
82	Sub basin 11	UNIPRO	On site storm water leaving AES presises	Southeast area of the plant had undergone extensive grading, slope control and the construction of a retaining wall to separate the water from leaving our site into the chevron phillips site.		X	X	Already Implemented
83	Multiple	UNIPRO	Coal/ ash area-Storm water pond interconexion	Connection was eliminated		X	X	Already Implemented
84	Sub basin 3	UNIPRO	Rain water intrusion into oil storage warehouse	Rolling door was replaced, building is sealed		X	X	Already Implemented

Appendix 2

Administrative Order on Consent
AES-PR Coal Fired Power Plant
Docket Number CWA-02-2015-3102

BMP's Implemented Detailed Photographs & Explanation

Structural BMP's

Administrative Compliance Order
AES-PR Coal Fired Power Plant
Docket Number CWA-02-2012-3100
&
Administrative Order on Consent
AES-PR Coal Fired Power Plant
Docket Number CWA-02-2015-3102

Constructed Structural BMP's

1- Action No.: 7
Subbasin: Multiple
Observation: Settleable solids in concrete channel
Proposed Action: Temporary silt fences
Actual Action: Gabion wall and geotexlie where installed.

Action No: 7 Before

Action No: 7 After

2- Action No.: 9
Subbasin: Multiple
Observation: Settleable solids in concrete channel
Proposed Action: Structural barrier with whipping holes lined with sediment filtering and oil and debris control rolls
Actual Action: Low Wall installation with flap valve and gabion wall.

Action No: 9 After

3- Action No.: 11
Subbasin: Multiple
Observation: Settleable solids in concrete channel
Proposed Action: Build a new wheel washing area for overall in plant fugitive dust control.
Actual Action: Wheel washer installation.

Action No: 11

4- Action No.: 16
Subbasin: 17A
Observation: Lack of soil stabilization near vehicle maintenance shop.
Proposed Action: Site regrading and stabilization.
Actual Action: Site regrading and stabilization with gabion rocks. Heavy equipment storage was relocated.

Action No: 16 Before

Action No: 16 After – From West to East

Action No: 16 After – From North to South

5- Action No.: 18
Subbasin: 3
Observation: Chemical Containers/vessels without secondary containment in proximity of storm water catch basin/drain, catch basin without inlet protection, process wastewater entering storm water catch basin.
Proposed Action: Temporary containment berm.
Actual Action: Construction of permanent unloading area for liquid and pellet urea with secondary containment.

Action No: 18 Before

Action No: 18 After

6- Action No.: 20 – 22 - 23
Subbasin: 3
Observation: Chemical Containers/vessels without secondary containment in proximity of storm water catch basin/drain. Catch basin without inlet protection. Process wastewater entering storm water catch basin.
Proposed Action: Drain guard catch basin filters.
Actual Action: Construction of permanent berms at urea preparation process and construction of low wall to avoid contamination at storm water catch basin.

Action No: 20 – 22 -23 Before

Action No: 20 – 22 -23 After

7- Action No.: 27
Subbasin: 16
Observation: Stormwater runoff from areas near cooling tower enters the offsite storm water diversion system at this location. Velocity dissipation is not provided. Sediments and gravel observed
Proposed Action: Control runoff by regarding the area and construct a berm.
Actual Action: Construction of low wall to avoid storm water runoff from areas near cooling tower enters the of site storm water diversion system.

Action No: 27 Before

Action No: 27 After

8- Action No.: 29 -30
Subbasin: Multiple
Observation: Waste storage containers without cover and secondary containment for spills.
Proposed Action: Establish Maintenance and Inspection Protocol for coverage with tarps after waste depositing.
Actual Action: All waste containers are covered with roll up covers. Also the numbers of waste bins has been reduced.

Action No: 29 - 30 Before

Action No: 29 - 30 After

9- Action No.: 32
Subbasin: 18
Observation: Backflow conditions at the off-site storm water diversion system.
Proposed Action: Backflow conditions are due to prevailing water saturated conditions at wetland discharge. Practices to reduce in-plant storm water by rainwater harvesting and in-situ infiltration
Actual Action: Divided wall and separate box culvert from offsite channel.

Action No: 32 After

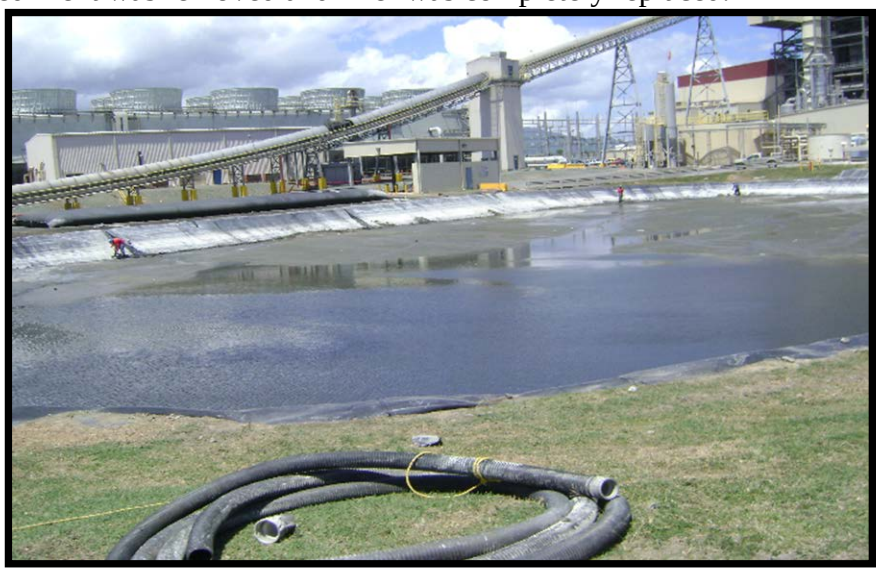
Action No: 32 After

10- Action No.: 33
Subbasin: Multiple
Observation: Lack of pile stabilization and erosion controls. Coal reaching conveyance concrete channel that discharges into coal pile runoff.
Proposed Action: As described on action No. 2 and 6 through 14
Actual Action: Installation of super silt fence and periodic cleaning.

Action No: 33 Before

Action No: 33 After

11- Action No.: 37
Subbasin: 16
Observation: Sedimentation in storm water pond
Proposed Action: As described on action No. 20 through 21
Actual Action: Installation of catch basin filters and routine inspection. Storm Water pond sediment was removed and liner was completely replaced.



Action No: 37 Before

Action No: 37 After

12- Action No.: 39
Subbasin: 17A
Observation: Exposed soil without erosion control and stabilization
Proposed Action: Site regrading and stabilization and revegetation
Actual Action: Site regrading and stabilization with gravel.

Action No: 39 Before

Action No: 39 After

13- Action No.: 40
Subbasin: 17A
Observation: Exposed soil without erosion control and stabilization
Proposed Action: Site regrading and stabilization and revegetation
Actual Action: Site regrading and stabilization with Geotextile Materials.

Action No: 40 Before

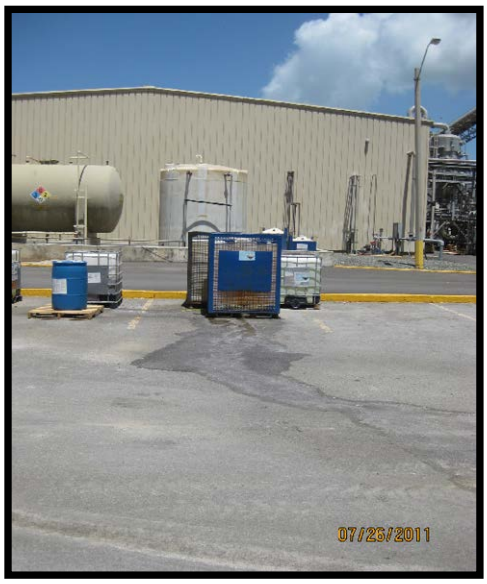
Action No: 40 After

14- Action No.: 44
Subbasin: Multiple
Observation: Portolettes
Proposed Action: Anchor of such system as to avoid overturning and spillage.
Actual Action: Anchor of such system as to avoid overturning and spillage.

Action No: 44 Before

Action No: 44 After

15- Action No.: 45 - 46
Subbasin: 5
Observation: Storage of chemical containers/vessels without secondary containment and exposed to rainwater
Proposed Action: Storage inside roofed areas of the Water Treatment Building
Actual Action: Storage inside roofed areas of the Water Treatment Building or secondary containment area.



Action No: 45 - 46 Before

Action No: 45 - 46 Before

16- Action No.: 48
Subbasin: Multiple
Observation: Conveyance system's missing protection panels
Proposed Action: Assemble missing panels
Actual Action: Assemble missing panels

Action No: 48 Before

Action No: 48 After

17- Action No.: 49
Subbasin: 15
Observation: Northeast culvert entrance poor drainage.
Proposed Action: Modify invert elevation and re-grading to manage offsite storm water runoff.
Actual Action: Modified the area, re-graded and installed new inlet.

Action No: 49 Before

Action No: 49 After

18- Action No.: 50
Subbasin: 1
Observation: Crossing for heavy vehicles at Switchyard East entrance
Proposed Action: Design a permanent crossing over open channel
Actual Action: Construction of permanent crossing.

Action No: 50 Before

Action No: 50 After

19- Action No.: 51 - 53
Subbasin: Multiple
Observation: Erosion visible in channels due to overbank instability
Proposed Action: Design controls to avoid erosion from overbanks
Actual Action: Installation of Geotextile Materials.

Action No: 51 Before

Action No: 51 After

20- Action No.: 53
Subbasin: 23
Observation: Lack of loading area for diesel tanks
Proposed Action: Design a loading area
Actual Action: After further evaluation, the current unloading area is sufficient and meets all requirements.

Action No: 53

21- Action No.: 54
Subbasin: 23
Observation: Need for wheel washing areas for the Agremax yard
Proposed Action: As described on action No. 11 and 12
Actual Action: Installation of wheel washer.

Action No: 54 Before

Action No: 54 After

22- Action No.: 55
Subbasin: 23
Observation: South open channel crossing for heavy vehicles
Proposed Action: Design a permanent crossing over open channel
Actual Action: Construction of permanent crossing.

Action No: 53 Before

Action No: 53 After

23- Action No.: 56
Subbasin: 16
Observation: Treatment plant run-off discharges
Proposed Action: Design secondary containment at the treatment plant
Actual Action: Extension of drain grating.

Action No: 56 Before

Action No: 56 After

24- Action No.: 60
Subbasin: 23
Observation: Earth channel discharging process water into Coal Pile Runoff Pond
Proposed Action: Concrete wall construction
Actual Action: Earth Channel was eliminated; water is pumped to an existing concrete channel

Action No: 60 Before

Action No: 60 After

25- Action No.: 61
Subbasin: 17A
Observation: Collapsed storm pipe
Proposed Action: Replacement of collapsed storm pipe between the rectangular and trapezoidal channel
Actual Action: Replacement of collapsed storm pipe between the rectangular and trapezoidal channel as well as the construction of a new crossing as seen above.

Action No: 61 After

26- Action No.: 62
Subbasin: Off site
Observation: Commingled waters from TAPI
Proposed Action: Design the solution to EPA's opinion about commingling of waters coming from TAPI
Actual Action: Construction of dividing wall and box culvert.

Action No: 62 Before

Action No: 62 After

27- Action No.: 63
Subbasin: 16A
Observation: Cooling tower related streams reaching 100-yr offsite storm water management channel
Proposed Action: Design containment to avoid foam from reaching said channel
Actual Action: Construction of secondary containment around the cooling tower.

Action No: 63 Before

Action No: 63 After

28- Action No.: 65
Subbasin: Multiple
Observation: Open channels headwalls poor structural integrity
Proposed Action: Design new headwalls for conveyance channels
Actual Action: Old head wall was taken out and replaced with a concrete bridge to increase flow and reduce potential blockage.

Action No: 65 Before

Action No: 65 After

29- Action No.: 66
Subbasin: 15
Observation: Incoming storm water from Chevron Phillips
Proposed Action: Design a hydraulic control structure to avoid offsite runoff from Chevron Phillips facility from entering AES's premises
Actual Action: Construction of berm and low wall.

Action No: 66 Before

Action No: 66 After

30- Action No.: 67 - 68
Subbasin: 20
Observation: Coal ash runoff pond overflows
Proposed Action: Design a hydraulic containment structure to eliminate overflows
Actual Action: Coal pile runoff pond was completely dredged, sediment was removed, liner was replaced in several sections, various patches in required areas and the pond is maintained at the appropriate level. Per the H&H study the pond has the capacity to handle the required 100 year storm event, therefore a hydraulic control structure to avoid offsite runoff is not necessary.

Action No: 67 – 68 Before

Action No: 67 – 68 After

31- Action No.: 71
Subbasin: 15
Observation: Exposed chemicals at facilities Northeast side
Proposed Action: Provide roofing over water clarifying chemical storage totes
Actual Action: Chemicals storage shed was purchased and installed.

Action No: 71 Before

Action No: 71 After

32- Action No.: 74
Subbasin: Multiple
Observation: Fugitive dust and material off tracking control
Proposed Action: Signage to control heavy equipment traffic direction and velocity
Actual Action: Installation of signage to control heavy equipment traffic direction and speed and water sprinkle to control fugitive dust.

Action No: 74 Before

Action No: 74 After

33- Action No.: 78
Subbasin: 16
Observation: Waste stream control at coal crushing building
Proposed Action: Design a sump pit to collect this waste streams and direct it to coal pile runoff pond
Actual Action: BMP of using the Vacuum truck to extract the water during building washing has been implemented.

Action No: 78 Before

Action No: 78 After

34- Action No.: 80
Subbasin: 20
Observation: Overflows from ponds
Proposed Action: Rooftop leaders and Parking lots runoff collection and direction into vegetated areas to infiltrate.
Actual Action: No action required. Based on the H&H Study, this water ends at the Storm Water Retention Pond and the overflow is allowed based on the MSGP Permit.

Action No: 80 Before

35- Action No.: 81
Subbasin: Multiple
Observation: On site storm water exiting premises
Proposed Action: South flank road leveling to avoid on site storm water and/or agremax pond overflows from reaching adjacent off site premises and existing storm water discharge
Actual Action: Low wall construction and road leveling.

Action No: 81 Before

Action No: 81 After

36- Action No.: 82
Subbasin: 11
Observation: On site storm water leaving AES presises
Proposed Action: South flank road leveling to avoid on site storm water and/or agremax pond overflows from reaching adjacent off site premises and existing storm water discharge
Actual Action: Construction of low wall, re-grading and head wall.

Action No: 82 Before

Action No: 82 After

37- Action No.: 85
Subbasin: 3 - 4
Observation: Potential pollution of storm water from ash.
Proposed Action: Re-grading of existing concrete slab and storm water diversion berm.
Actual Action: Re-grading of existing concrete slab and storm water diversion berm.

Action No: 85 Before

Action No: 85 After

38- Action No.: 86
Subbasin: 5
Observation: Potential pollution of storm water from ash.
Proposed Action: Dike with corresponding drainage and sump pit.
Actual Action: Secondary containment with corresponding drainage and sump pit.

Action No: 86 After

39- Action No.: New
Subbasin: Multiple
Observation: Lack of fugitive emission control at Agremax Pile.
Proposed Action: Upgrade pump and add additional sprinklers to cover all Agremax Pile.
Actual Action: Upgrade pump and add additional sprinklers to cover all Agremax Pile.