COAL COMBUSTION RESIDUALS (CCR)
ANNUAL INSPECTION REPORT

AES PUERTO RICO, KM 142.0, STATE ROAD PR-3
GUAYAMA, PR 00784

Intended for:

AES Puerto Rico

Report Date:

January 28, 2026

Reporting Period:

January 2025 to December 2025

Prepared by:

AEN Consulting Engineering, P.S.C.

AEN GROUP
INTEGRATED SOLUTIONS, RELIABLE INDUSTRIAL SERVICES

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1. INTRODUCTION

AEN Consulting Engineering (AEN) was retained by AES Puerto Rico, LP (AES) to conduct an annual inspection of AES on-site Coal Combustion Residuals (CCR) unit facility located at Km 142.0, State Road PR-3 in Guayama, Puerto.

The objective of this annual inspection was to ensure that the design, construction, operation, and maintenance of the CCR unit are consistent with recognized and accepted engineering practices in conformance with the CCR Rule Title 40 CFR § 257.84(b).

1.1. Inspection Scope

The scope of this annual inspection included:

- A review of available information and documentation related to the current condition and operational status of the CCR unit, including records maintained in the operating record.
- A visual inspection of the CCR unit (AES Agremax™ Stockpile Area) conducted to identify any visible signs of structural distress, deterioration, or indications of potential malfunction

2. FACILITY INFORMATION

The facility is a coal-fired electric generating plant located on the south coast of Puerto Rico, approximately 3.4 miles southwest of downtown Guayama, within the municipality of Guayama, Puerto Rico.

The facility operates as a bituminous coal-fueled power plant with a total electricity generation capacity of 520 megawatts. Electricity generated at the facility is supplied to LUMA Energy, the entity responsible for electric power transmission and distribution throughout Puerto Rico.

Address: AES Puerto Rico
Km 142.0 State Road PR-3
Guayama, Puerto Rico 00784

2.1. CCR unit description

The CCR unit, also known as the Agremax™ Stockpile Area, is located in the southeast quadrant of the AES-PR facility, south of the power plant and east of the limestone storage dome.

Fly ash and bottom ash generated from the coal combustion process are initially stored in two elevated silos located south of the facility's Power Block building. Agremax™ is a manufactured aggregate produced by AES using coal combustion residuals (CCRs). The dry CCRs (fly ash and bottom ash) are blended in a pug mill, where the material is conditioned to achieve sufficient moisture content to prevent wind dispersal without generating free liquids.

Following conditioning, the Agremax™ material is transferred via an enclosed belt conveyor to an open stockpile area, where it is maintained in a moist condition through controlled water application to minimize wind dispersion without producing free liquids. The Agremax™ inventory is placed and shaped into stockpiles using bulldozers or by dump trucks loaded with material using an excavator or front-end loader. The dump trucks then place the material onto the stockpile within the designated Stockpile Area, located south of the power plant and east-southeast of the limestone storage dome.

For final off-site disposition, Agremax™ material is transported by a bulldozer to a crusher located on the southwest side of the Stockpile Area. The crushed material is then conveyed via an enclosed belt conveyor to the AES dock area, approximately 0.7 miles southwest of the Stockpile Area, where it is loaded onto marine vessels for overseas shipment.

2.2. Components of the CCR unit

Equipment and vehicles present and/or utilized within and around the Agremax™ Stockpile Area include a front-end loader, bulldozer, backhoe, water truck equipped with rear spray nozzles and a front water cannon, broom sweeper, mobile water sprinkler guns, large-diameter water hoses, and a feeder/crusher/breaker mill.

The CCR unit also incorporates a physical containment system designed to prevent run-on, sediment migration, and uncontrolled runoff from the stockpile area. This containment system consists of a leachate collection system, reinforced concrete drainage channels, a low concrete containment wall located along the facility's southern property boundary on the south side of the Stockpile Area, and a no-discharge runoff pond. The runoff pond collects stormwater runoff that may contain Agremax™ and/or coal particulates, preventing any discharge beyond the facility boundary.

3. CCR UNIT SITE RECONNAISANCE

3.1. Date of CCR unit inspection

AEN Consulting Engineering, conducted a site visit and performed a visual inspection of the AES CCR unit during the morning of December 16, 2025.

3.2. Weather at time of CCR unit inspection

Weather conditions at the time of the CCR unit inspection were sunny with clear skies, calm winds (approximately 10 to 15 mph), and an ambient temperature of approximately 81 degrees Fahrenheit (°F).

3.3. Methodology and Limiting Conditions

AEN Consulting Engineering, confirmed the boundaries of the Stockpile Area and conducted a reconnaissance-level inspection along its accessible perimeter and terraces. Areas where access could have posed potential health and/or safety hazards were not entered or evaluated.

The Stockpile Area was visually assessed to identify any observable evidence of distress, deterioration, or operational malfunction of the CCR unit.

3.4. Escort

AES personnel supported the CCR unit inspection through on-site escort services and the provision of operational and administrative information. Luis Cruz, Senior Environmental Coordinator, served as the primary point of contact for the inspection and accompanied the inspection team during the field reconnaissance. Gil Rosario, CCP Operator, also provided on-site escort support during the site visit.

As part of the same inspection effort, AEN Consulting Engineering, conducted discussions with AES personnel to obtain relevant information and documentation related to CCR management practices, operational procedures, and recordkeeping. In addition to Mr. Cruz, these consultations included Felipe Bruneau, EHS Manager, and José Manautou, Coal Combustion Product (CCP) Coordinator.

3.5. General Observations

Based on the visual inspection conducted during the site visit, the Agremax™ Stockpile Area was observed to be in good condition at the time of inspection. The stockpile appeared stable, with no visible signs of structural distress, instability, or operational malfunction. Surface conditions were orderly and well maintained, and overall housekeeping within the Stockpile Area was observed to be satisfactory. No material transfer operations to or from the stockpile were taking place at the time of the inspection.

No visible dust emissions or wind-blown material were observed during the inspection, indicating that dust control measures were effectively implemented at the time of the site visit. The stockpile surface appeared adequately conditioned, and the surrounding area

was clean, with no apparent accumulation of loose CCR material beyond the designated stockpile footprint.

3.6. Access Road

The Stockpile Area access road was observed to be well graded, with Agremax™ berms along the edges. The roadway was wetted at the time of the inspection.

3.7. Stockpile Surface / Slopes

The berms surrounding the Stockpile Area were observed to be stable, intact, and free of obstructions at the time of the inspection. No visible signs of erosion, settlement, or distress were observed along the berms.

The stockpile surface was observed to be adequately wetted as part of routine dust control practices. Minor surface rills were observed in localized areas of the stockpile surface. These rills appeared to be primarily associated with routine operational activities, including haul truck traffic and ongoing stockpile maintenance conducted using heavy equipment, rather than excessive water application. These surface features did not appear to adversely affect the overall performance or stability of the stockpile.

No evidence of animal burrows or other surface disturbances was observed within the Stockpile Area. Overall, the stockpile slopes appeared uniform and stable, with an estimated inclination ranging from approximately 45 to 55 degrees and were observed to be adequately maintained at the time of the inspection.

3.8. Erosion

No significant erosion was observed on the slopes or surface of the Stockpile Area at the time of the inspection. The slopes appeared stable, and no evidence of rills, gullies, or erosional features indicative of adverse erosion conditions was identified that would affect the integrity or performance of the stockpile.

3.9. Dust

Operational dust control measures were observed to be present on site and in service-ready condition at the time of the inspection. These measures included a water truck, large-diameter water hoses, mobile water sprinkler guns, and a broom sweeper within the Stockpile Area. Water hoses and mobile sprinkler guns were observed on site and in operable condition during the inspection. During the site visit, a water truck was also observed actively spraying operational areas of the facility, consistent with routine dust suppression practices.

No visible fugitive dust emissions or dust plumes were observed originating from the Stockpile Area at the time of the site visit, indicating that dust control measures were effective under the observed site and weather conditions.

3.10. Sediment

No sediment accumulations were observed within the concrete drainage channels bordering the Stockpile Area at the time of the inspection. Sediment conditions within the Stockpile Area appeared to be adequately controlled, and no sediment deposits were observed that would impede drainage or affect the performance of the CCR unit.

3.11. Drainage

The concrete drainage channels surrounding the Stockpile Area were observed to be clean, unobstructed, and free of debris at the time of the inspection. The channels appeared to be properly maintained and capable of conveying runoff as intended under observed site conditions.

3.12. Containment Structures

The containment and control structures associated with the CCR unit, including the leachate collection system, concrete drainage channels, the low concrete wall along the facility's southern property boundary, and the no-discharge runoff pond, were visually inspected and appeared to be in good overall condition. These structures exhibited no visible signs of cracking, settlement, deformation, erosion, or other conditions that would indicate compromised structural integrity or reduced functionality at the time of the inspection.

4. REVIEW OF AVAILABLE INFORMATION

A review of available inspection and operational records was conducted as part of the annual CCR unit inspection. The reviewed documentation included daily Dust Control Inspection Checklists, weekly Stockpile Inspection forms, results of previous annual inspections and records related to Dust Control Training. All requested information was available for review at the time of the inspection.

Based on the reviewed records, routine inspections and monitoring activities appear to have been conducted in accordance with the established frequencies and inspection intervals. The records did not identify any significant issues or adverse conditions related to CCR management or stockpile operations during the referenced inspection periods.

Based on the review of the available records, no issues were identified related to CCR handling practices or conditions that would indicate concerns with the structural integrity or overall performance of the CCR unit.

5. CONCLUSIONS

5.1. Changes in Geometry of CCR unit

Both the eastern and western portions of the Stockpile Area were observed to be filled with Agremax™. The Agremax™ present in the Stockpile Area was stored as a single stockpile with a height of approximately 75 feet above ground surface.

5.2. Approximate volume of CCR contained in the unit

The estimated volume of Agremax™ within the Stockpile Area was determined using the most recent structural laser scan survey, consistent with facility practices in which surveys are performed following significant changes in stockpile tonnage, volume, or height resulting from material shipped off-site for overseas disposal and inventory management purposes.

During 2025, AES completed three such surveys due to variations in the stockpile associated with these inventory changes. Because no significant changes occurred between the last survey in November 2025 and the date of the visual inspection, those measurements were considered representative of site conditions. Based on this survey, the Agremax™ stockpile volume was estimated at approximately 315,973 cubic yards, corresponding to about 212,002 tons.

5.3. Potential structural weakness of CCR unit

Based on the visual inspection conducted as part of this annual evaluation, no apparent or potential structural weaknesses were observed in the Agremax™ stockpile or its associated ancillary structures at the time of the inspection. The CCR unit appeared to be stable and properly managed under observed site conditions.

No visual indicators of instability, distress, or conditions that would suggest compromised structural performance of the CCR unit were identified during the inspection.

6. CERTIFICATION

I hereby certify that the visual inspection and report for the Agremax™ Stockpile Area, owned and operated by AES Puerto Rico, LP, has been prepared by AEN Consulting Engineering, PSC. I have prepared the contents of this report and certify that, to the best of my professional knowledge and judgment, the information presented herein meets the applicable requirements of the Coal Combustion Residuals Rule, 40 CFR §257.84(b).

I am a duly licensed Professional Engineer under the laws of Puerto Rico.

Axel E. Nieves Arriba, P.E.

01/26/2026

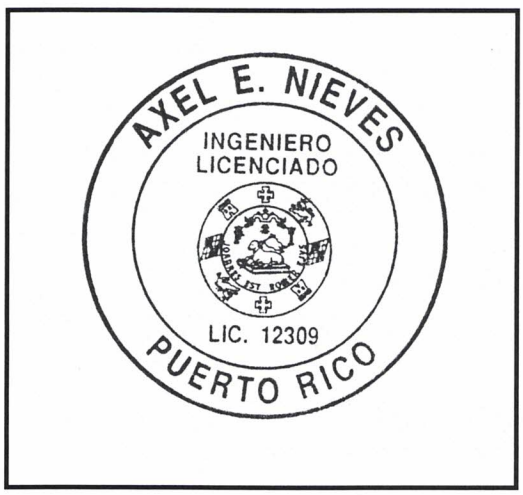
Date

12309

P.E License Number

03/04/2026

P.E. License Renewal Date



P.E. Seal

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ESTAMPILLA DIGITAL ESPECIAL (EDE)

Ing. Axel E. Nieves Arriba, PE

Práctica de:	Ingeniería
Licencia:	12309
Renglón:	Certificación
Descripción del Trabajo:	Inspección y Verificación de Instalaciones
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Rol del Profesional:	Consultor

Certificación:

El profesional certifica con la emisión de la estampilla digital especial del Colegio de Ingenieros y Agrimensores de Puerto Rico el haber cumplido con las disposiciones de la Sección 11 de la Ley 319 del 15 de mayo de 1938, según enmendada.

La colocación del sello profesional constituye la cancelación de la estampilla digital especial