

**ANNUAL COAL COMBUSTION RESIDUALS (CCR)
FUGITIVE DUST CONTROL REPORT**

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

Intended for:

AES Puerto Rico

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Reporting Period:

January 2025 to December 2025

Prepared by:

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1. INTRODUCTION

This Annual CCR Fugitive Dust Control Report has been prepared to document the measures implemented by AES Puerto Rico (AES) to minimize and control fugitive dust emissions associated with the Coal Combustion Residuals (CCR) unit located at Km. 142.0 of State Road PR-3 in Guayama, Puerto Rico. The report has been developed in accordance with the requirements of the CCR Rule, Title 40 Code of Federal Regulations (CFR) §257.80(c), which mandates annual documentation of fugitive dust control activities, citizen complaint records, and any corrective measures taken during the reporting period of January 2025 through December 2025.

AES engaged AEN Consulting Engineering to conduct an evaluation of the facility's fugitive dust control practices and to prepare this annual report. This evaluation includes a review of site activities related to CCR handling and management, implementation of dust control measures, responses to any fugitive dust incidents, and documentation of operational controls designed to ensure continued compliance with the CCR Rule.

1.1. Scope

This annual report evaluates the condition and effectiveness of the fugitive dust control measures implemented at the AES Puerto Rico facility during the reporting period of January 2025 through December 2025.

As part of this assessment, AEN Consulting Engineering conducted an on-site visual inspection to verify the condition of CCR-related equipment, observe operational practices, and evaluate the actions taken by AES to minimize and control fugitive dust associated with the handling, storage, and management of Coal Combustion Residuals (CCR) and Agremax™ materials.

The scope of this evaluation includes the review of inspection findings, operational controls, and supporting documentation related to the implementation and performance of fugitive dust control measures across all CCR and Agremax™ handling areas at the facility, including:

- Bottom ash and fly ash storage silos
- Pug mill operations
- Truck loading and feeding areas
- Elevated covered conveyor systems
- Stockpile areas
- On-site truck transportation routes
- Marine dock handling and loading operations

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.

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

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. CCR Fugitive Dust Control Components

The primary equipment and structural controls used to minimize and control fugitive dust emissions from the CCR unit include a combination of engineered enclosures,

water-based suppression systems, and roadway management practices. These controls consist of:

- **Structural enclosures**, including covered and elevated conveyor belts designed to contain material during transport
- **A dedicated water truck** equipped with rear spray nozzles and a front water cannon for roadway and material wetting
- **A broom sweeper** for maintaining paved surfaces free of accumulated particulate material
- **Mobile water sprinkler guns** deployed as needed for targeted dust suppression
- **Large-diameter water hoses** used for operational wetting and material conditioning
- **Curved and paved haul roads**, engineered to reduce vehicle-generated dust and allow effective maintenance
- **A fixed water spray nozzle system**, located within the articulated telescoping spout at the material drop/loading and shipping area of the AES marine dock/pier

Together, these components function as the facility's integrated fugitive dust control system, supporting compliance with 40 CFR §257.80 requirements for minimizing off-site migration of CCR-related particulate matter.

3. DESCRIPTION OF ACTIONS TAKEN TO CONTROL CCR FUGITIVE DUST

During the reporting period, AES continued implementing the fugitive dust control practices established in the CCR and Agremax™ Dust Control Plan. Routine operational inspections and dust-suppression activities were performed to ensure that control measures remained effective throughout all CCR and Agremax™ handling areas.

Daily dust control activities included the regular operation of the facility's water truck, which is equipped with rear spray nozzles and a front water cannon. The water truck was used to wet paved haul roads, loading areas, and other high-traffic surfaces to minimize vehicle-generated particulate emissions. During the on-site visual inspection performed by AEN Consulting Engineering, the water truck was observed actively applying water to roadway surfaces as part of the facility's standard dust-suppression practices.

AES personnel completed the Dust Control Inspection Checklist twice per day, consistent with facility procedures. These inspections document equipment condition, housekeeping, roadway surfaces, and the effectiveness of control measures. In addition

to the twice-daily inspections, the facility continued preparing its weekly Fugitive Dust Control Report, which summarizes operational conditions, dust control activities, equipment performance, and any observations requiring follow-up. A review of these weekly reports found no significant non-conformances or deviations from the CCR and Agremax™ Dust Control Plan.

During the site visit, speed limit signage was observed throughout CCR handling areas. The posted speed limits help reduce vehicle-generated dust and promote consistent adherence to operational best practices for dust minimization. Observations during the inspection confirmed that these controls were in place and properly maintained.

Fugitive dust control equipment was also evaluated during the visit. The broom sweeper—used to maintain paved surfaces free of accumulated particulate material—was observed to be in excellent operational condition, with no deficiencies noted. Other dust-suppression components also appeared to be functioning as intended.

As part of the review, AEN Consulting Engineering verified the facility's internal training documentation. One annual training session was provided to CCR operations personnel during the reporting year to ensure that dust control practices, inspection protocols, and Standard Operating Procedure (SOP) requirements are understood and effectively followed. Training records reviewed confirmed that this session was conducted and that relevant staff completed the required training.

Overall, inspection records, weekly reports, field observations, and training documentation collectively demonstrate that AES maintained effective implementation of fugitive dust control measures during the reporting period, supporting continued compliance with the requirements of 40 CFR §257.80(c).

4. RECORD OF CITIZEN COMPLAINTS

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

5. SUMMARY OF CORRECTIVE ACTIONS TAKEN

No significant corrective actions were required or implemented during this reporting period. A review of the twice-daily Dust Control Inspection Checklists, weekly Fugitive Dust Control Reports, and operational records indicated that fugitive dust control measures were functioning as intended and in accordance with the CCR and Agremax™ Dust Control Plan.

Field observations conducted during the on-site inspection by AEN Consulting Engineering further confirmed that equipment and control practices were in good operational condition, and routine dust-suppression activities were performed during the reporting period.