

## Winston R. Esteves

## **Environmental Consultant**

July 15, 2019

SUBJECT: Demonstration for 60-Day Extension – Corrective Measures Assessment (CMA)
AGREMAX<sup>TM</sup> Staging Area-AES Puerto Rico, Guayama, Puerto Rico

Pursuant to CFR Title 40 Chapter 257 Subpart D §257.96(a) (CCR Rule), I certify that AES Puerto Rico (AES-PR) AGREMAX™ staging area (Staging Area) has demonstrated the need for an additional 60 days beyond the regulatory time period of 90 days to complete the assessment of corrective measures due to site-specific conditions and the evaluation of remedial treatment alternatives in support of an informed CMA process.

In the case of the assessment for the Staging Area, the site has complex transitional marine shoreline hydro geological and geochemical characteristics and is encroached by other industrial facilities. This setting will require further comprehensive investigations to support a thorough CMA process since nature and extent information is an important component of the CMA. Based on these site-specific conditions, a 60-day extension is needed to complete the CMA process.

This certification is based solely upon, and limited by, information provided by others and my understanding of applicable environmental regulations. While I used reasonable care to avoid reliance upon faulty or incomplete information, I am not able or required to verify the accuracy of all data and information provided by third parties. I did not detect obvious inconsistencies or omissions of a nature that might question the validity of the information. I assume no responsibility for any consequence arising from any information or condition that was inaccurate, concealed, withheld, misrepresented or otherwise not fully disclosed or available to me from third parties. If additional information that might impact my conclusions becomes available, I reserve the right to review the information, reassess the potential concerns, and modify my opinions, if warranted.

This certification is to the best of my knowledge and belief, accurate and complete.

Signed:

Winston R. Esteves PE, BCEE, QEP, CHMM Consulting Principal