



Clean Water Act Section 404: Site Visit/Case Development

For inspections authorized pursuant to Clean Water Act sections 308 and 404 (33 U.S.C. §§ 1318 and 1344)

This report includes only factual information gained by documentation, onsite observations, and/or onsite interviews.

Inspector Name(s)	Seika Robinson	Time In	11:20 AM	Start Date	January 25, 2023
		Time Out	1:45 PM	End Date	January 25, 2023
Inspector's Organization	US EPA Region 2, Water Division, Water Management Branch, Wetlands Protection Section				
Organization Requesting Inspection (if different)	N/A				
Inspection Type	Case Development	Inspection Status	Original		
Site Name	Service Unlimiteds, LLC (hereinafter as "Service Unlimiteds")				
Site Address*	Tax parcel number 416-000-010-11-000 (hereinafter as "the Property")				
City*	Salinas	County*	Salinas	State*	PR Zip Code* 00751
Mailing Address*	PO Box 360653				
City*	San Juan	County*	San Juan	State*	PR Zip Code* 00936
Latitude*	17.971585	Longitude*	-66.313861		
Estimated Size of Site (acres)	20.8	Is there a home on the site?	☐ Yes ☒ No		
Inspector Signature	SEIKA ROBINSON			Digitally signed by SEIKA ROBINSON Date: 2023.03.22 15:35:53 -04'00'	Date 3/22/23
Supervisor Signature	MARCO FINOCCHIARO			Digitally signed by MARCO FINOCCHIARO Date: 2023.03.23 15:17:21 -04'00'	Date 3/23/23

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Site Name	Service Unlimiteds, LLC (hereinafter as "Service Unlimiteds")	Start Date	January 25, 2023
		End Date	January 25, 2023
Inspection Purpose	Initial site visit		
Opening Conference			
☒ Presentation of Inspector Credentials Name and Title (Use N/A if owner/operator not available to join the inspection) Inspector, Seika Robinson presented credentials to Mr. George Phillip Rivera Gonzalez of Service Unlimiteds, the owner of the Property.			
☒ Opening Conference Name of person authorizing access if applicable Mr. George Phillip Rivera Gonzalez authorized access of the Property via phone on January 19, 2023 and again, in-person, the day of the inspection.			
Notes from Opening Conference EPA explained the purpose of the inspection, including EPA and the US Army Corps of Engineers (hereinafter as "the Corps") role with regulating wetlands under the CWA, and what areas would be inspected. Mr. González explained to EPA that he has not obtained permits from the Corps for any work completed. He also stated that a few days prior to EPA's inspection, DNER seized Mr. González's John Deer brand digger, thus discontinuing any further work in the area. Mr. González also provided information such as, what activities he conducted and, what are the reasons for the vegetative clearing and earthmoving activities he had conducted. He stated that no additional fill material was brought onto the Property from an off-site source and that all the soil in the impacted area came from the northern portion of the Property. Mr. González also pointed out a shipping container on the northwestern part of the property. He explained that he utilizes the container for personal storage and there are no utilities for the container but, plans on installing utilities in the future. Upon entering the Site, Mr. González, Mr. Ortiz, and EPA drove down a road to the southern coast of the Site to begin the inspection of the Site conditions. Once EPA began the inspection after the conclusion of the opening conference, Mr. González and Mr. Ortiz left the Property.			
☐ Access Issues if Any Describe The Property is located behind a locked, gated entrance off PR-1 in which Mr. Gonzalez has the key for.			
Inspection Observations and Sample Collection			
Site Owner/Site Operator/Responsible Party (Name, title and contact information) Site owner and operator: Mr. George Phillip Rivera Gonzalez of Service Unlimiteds; [REDACTED]			
Additional Persons Present at Inspection EPA: Sofia Olivero Lora, PhD; R02-WD-WMB-WPS and Yolianne Maclay, CEPD-MPCB-CWAT Mr. David Ortiz, acquaintance of Mr. Gonzalez			
General Site Characteristics (layout of property, etc.) The Property, is approximately 20.8-acre in size. Mr. Gonzalez has expanded his work past his property boundary, into public lands. The entirety of the inspected area comprised of the Property, public coastal land, and open waters, will be hereinafter referred to as			

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Site Name	Service Unlimiteds, LLC (hereinafter as "Service Unlimiteds")	Start Date	January 25, 2023
		End Date	January 25, 2023
"the Site" (see Attachment A for a map of the Site). The Site is located on the western side of Rio Nigua which drains into Bahía de Rincón to the south, both navigable waters under the CWA. There is also an unnamed tributary to the west of the Property that was not directly impacted by the work on the Site. EPA has identified the Municipality of Salinas as a community with environmental justice concerns. The Site must be entered off of PR-1. After entering the site through a locked gated fence, an open field with a central road headed south to the coastline. A large portion of the site could not be reached by vehicle and has to be explored by foot. There are no commercial or residential buildings located on the site; however, Mr Gonzalez has a shipping container located by the northwestern corner of the property containing personal items			
Purpose and Need for Discharge of Dredged and/or Fill Material Mr. Gonzalez stated that the purpose of the earthmoving activities is to support any of his many business ventures planned for the Site. There is currently no proposed plan for the Site. Potential future plans for the site communicated by Mr. González include campgrounds, personal residence, building a hotel, etc.			
Site Overview (Past inspections, site description, permits, etc.) There are no known Corps wetland permits for activities at the Site. There has been no prior EPA inspections conducted at the Site.			
Scope of Inspection (Areas inspected or not inspected) EPA drove down to the southern portion of the Site to where the Service Unlimiteds property meets with the public lands. From that point, EPA investigated the entirety of the Site by foot.			

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Site Name	Service Unlimiteds, LLC (hereinafter as "Service Unlimiteds")	Start Date	January 25, 2023
		End Date	January 25, 2023
Environmental Conditions (e.g., wind, rain, smoke, dust, temperature, snow)			
Temperatures were in the 80s (degrees in F); sunny; dry season			
Field Work Conducted			
During the inspection, EPA collected GPS data, photographs, and handwritten notes. Observations were recorded with the understanding that the inspection occurred during the dry season. No soil pits were dug during this inspection. The inspection focused on evaluating the extent of earthmoving impacts, more specifically the southern half of the Site where the most recent impacts have been made. EPA took GPS points along the shoreline of Bahía de Rincón and Río Nigua to measure the waterward extent of the impacts at the time of the inspection. EPA found evidence of fill material, comprised of natural soils, within waters, expanding the coastline of Bahía de Rincón. GPS points were also taken at the edge of the dirt roads along the southern portion of the Site. See Attachment A for a map of the Site containing the GPS points. A large portion of the Site has been removed of vegetation. Piles of vegetative debris, mostly comprised of wood from the vegetation cleared on the Site, were found throughout the Site. In the center of the Site, a large, cleared area was seen with the majority of the large debris piles. Several dirt paths, areas cleared of vegetation, were discovered along the eastern side of the Property. These paths either lead into one another or were dead ends. Along these paths, fill material was observed covering mangrove root systems of trees that were either removed or remain on the Site. A concrete pad was found on the southernmost part of the Property on the shoreline of Bahía de Rincón. EPA also went to see the bridge structure on the northeastern part of the Property. See Attachment A- for a photolog of the observations EPA made on the Site.			
Closing Conference			
Documents Received and/or Requested During the Inspection			
Prior to the inspection, EPA issued a Section 308 Request for Information (RFI) letter to Mr. Gonzalez on January 20, 2023 via email. EPA requested that Mr. Gonzalez respond to the RFI letter. During the time of the visit, Mr. Gonzalez presented EPA a letter from the Puerto Rico Department of Agriculture entitled "Recomendaciones agronomicas adicionales para actividad incidental practicas agricolas (Ley #140)" (translation: Additional agronomic recommendations for incidental activity agricultural practices (Law #140)).			
Compliance Assistance Provided (If any)			
EPA relayed to Mr. Gonzalez that a permit from the Corps is required to be obtained prior to performing work in WOTUS, including federal wetlands, regardless of location of the WOTUS on privately and/or publicly owned property.			
Observations Relayed to Site Owner/Operator			
N/A - Mr. Gonzalez left the Site prior to completion of EPA inspection.			
Actions Taken by Owner/Operator During the Inspection (If any)			
N/A			

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Site Name	Service Unlimiteds, LLC (hereinafter as " Service Unlimiteds")	Start Date	January 25, 2023
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Potential Issues of Concern Including Regulatory Citations			
Potential areas of jurisdictional wetlands and streams may be present on the site. A forensic wetland delineation is recommended prior to conducting additional work within suspected wetland areas.			
Attachments*			
☒ Maps and Sketches			
☒ Photographs (including location) and Photo Log			
☐ Other (SSIP, Wetlands Delineation Forms, etc.)			
Attachment A: Map with GPS Points; Attachment B: Photolog			
Additional Notes			

Attachment A: Map with GPS Points



Attachment B - Photolog

CWA 404 Inspection

Service Limiteds, LLC

Tax parcel number 416-000-010-11-000 in the
Municipality of Salinas, Puerto Rico

January 25, 2023



Date: January 25, 2023

Time: 11:44 AM

Photographer: Sofia Olivera Lora

Photo ID: P1250424

Description: View of the remaining vegetation on the southeastern portion of the Property. Rio Nigua can be seen on the right.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 11:46 AM

Photographer: Sofia Olivera Lora

Photo ID: P1250426

Description: View of Rio Nigua at the southeastern most point of the Site. Widespread vegetative clearing and evidence of earthmoving work can be seen throughout the Site.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:04 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250504

Description: Widespread vegetative clearing and evidence of earthmoving work can be seen throughout the Site.

Approximately 1.5 feet of fill material was placed throughout the Site for the purposed of creating a road for vehicular access.

Bahía de Rincón can be seen ahead.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:00 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250494

Description: About 3 feet away from the bank of Rio Nigua, approximately 2 of fill material was found on top of saturated soils and mangrove roots.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 12:57 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250481

Description: Saturated soils found below 2 feet of soil.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 11:54 AM

Photographer: Sofia Olivera Lora

Photo ID: P1250429

Description: View of the southern coast of the Site.
Widespread vegetative clearing and evidence of
earthmoving work can be seen throughout the Site.

Bahía de Rincón can be seen ahead.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 11:56 AM

Photographer: Sofia Olivera Lora

Photo ID: P1250439

Description: View of the southern coast of the Site.
Widespread vegetative clearing and evidence of
earthmoving work can be seen throughout the Site.

Bahía de Rincón can be seen ahead.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 11:56 AM

Photographer: Sofia Olivera Lora

Photo ID: P1250440

Description: View of the southern coast of the Site.
Widespread vegetative clearing and evidence of
earthmoving work can be seen throughout the Site.

Bahía de Rincón can be seen ahead.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 12:01 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250448

Description: View of the southern coast of the Site.
Widespread vegetative clearing and evidence of
earthmoving work can be seen throughout the Site.

Bahía de Rincón can be seen ahead.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 12:09 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250454

Description: View of the southern coast of the Site.
Widespread vegetative clearing and evidence of
earthmoving work can be seen throughout the Site.

Bahía de Rincón can be seen ahead.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 11:54 AM

Photographer: Sofia Olivera Lora

Photo ID: P1250431

Description: Widespread vegetative clearing and evidence of earthmoving work can be seen throughout the Site.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 12:14 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250465

Description: View of the southern coast of the Site.
Widespread vegetative clearing and evidence of
earthmoving work can be seen throughout the Site.

Bahía de Rincón can be seen ahead.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 12:21 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250476

Description: Widespread vegetative clearing and evidence of earthmoving work can be seen throughout the Site.

Approximately 1.5 feet of fill material was placed throughout the Site for the purposed of creating a road for vehicular access.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 12:22 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250479

Description: Approximately 1.5 feet of fill material was placed throughout the Site for the purposed of creating a road for vehicular access.

Bahía de Rincón can be seen ahead.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:03 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250497

Description: Widespread vegetative clearing and evidence of earthmoving work can be seen throughout the Site.

Bahía de Rincón can be seen ahead.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:09 PM

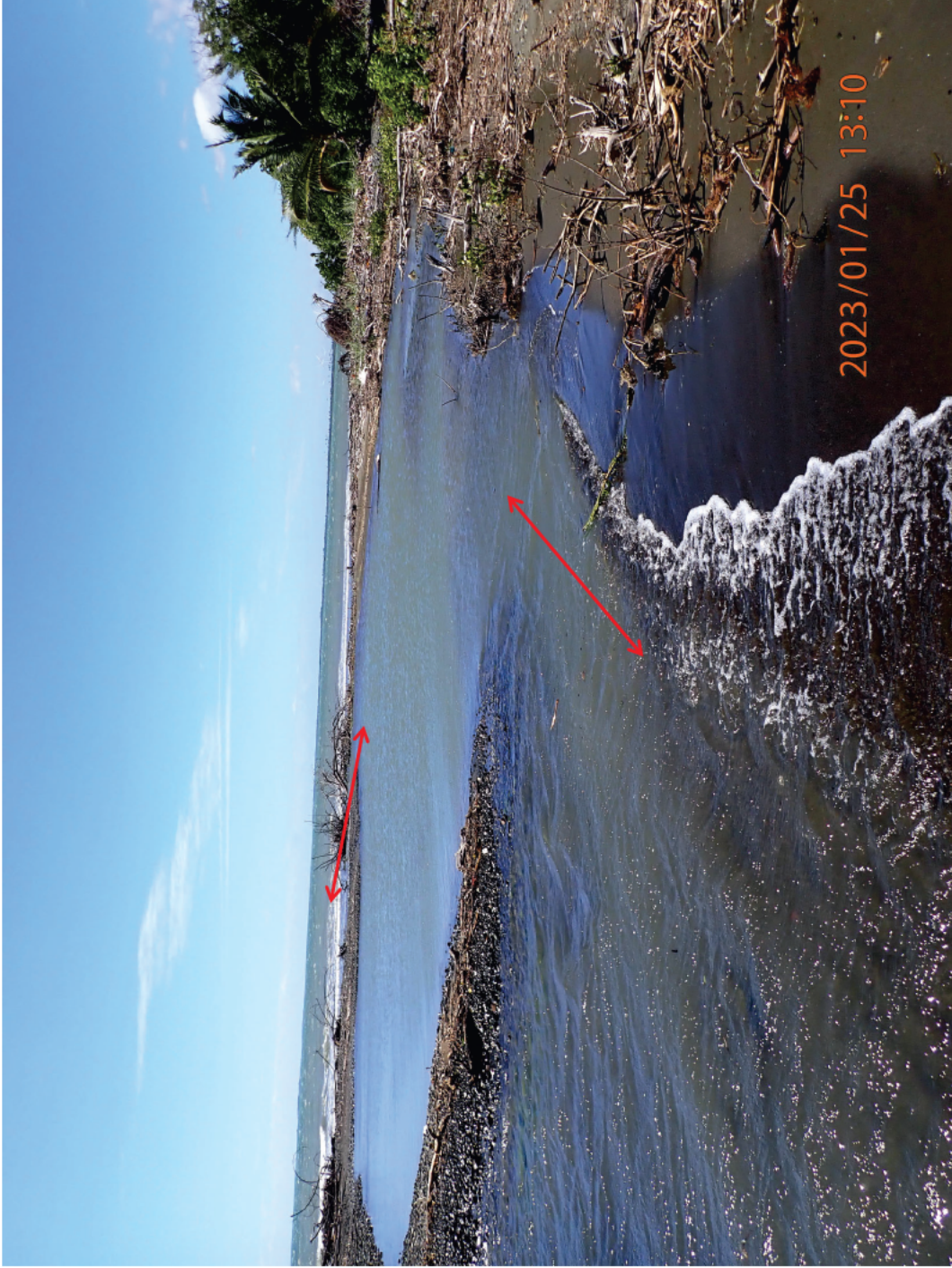
Photographer: Sofia Olivera Lora

Photo ID: P1250515

Description: Concrete pad found on the southern coast of the Site.

Bahía de Rincón can be seen ahead.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:10 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250521

Description: View of the southwestern coast of the Site.

Bahía de Rincón can be seen ahead.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:11 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250529

Description: View of the southwestern coast of the Site.

*Red arrows marks the direction of the flow.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:14 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250532

Description: Vegetative clearing and ponding water
fond on the southwestern portion of the Site.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:23 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250538

Description: Panorama of the center of the Site where vegetation had been cleared and where the vegetative debris from the Site is stored.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:24 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250541

Description: Panorama of the center of the Site where vegetation had been cleared and where the vegetative debris from the Site is stored.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 2:41 PM

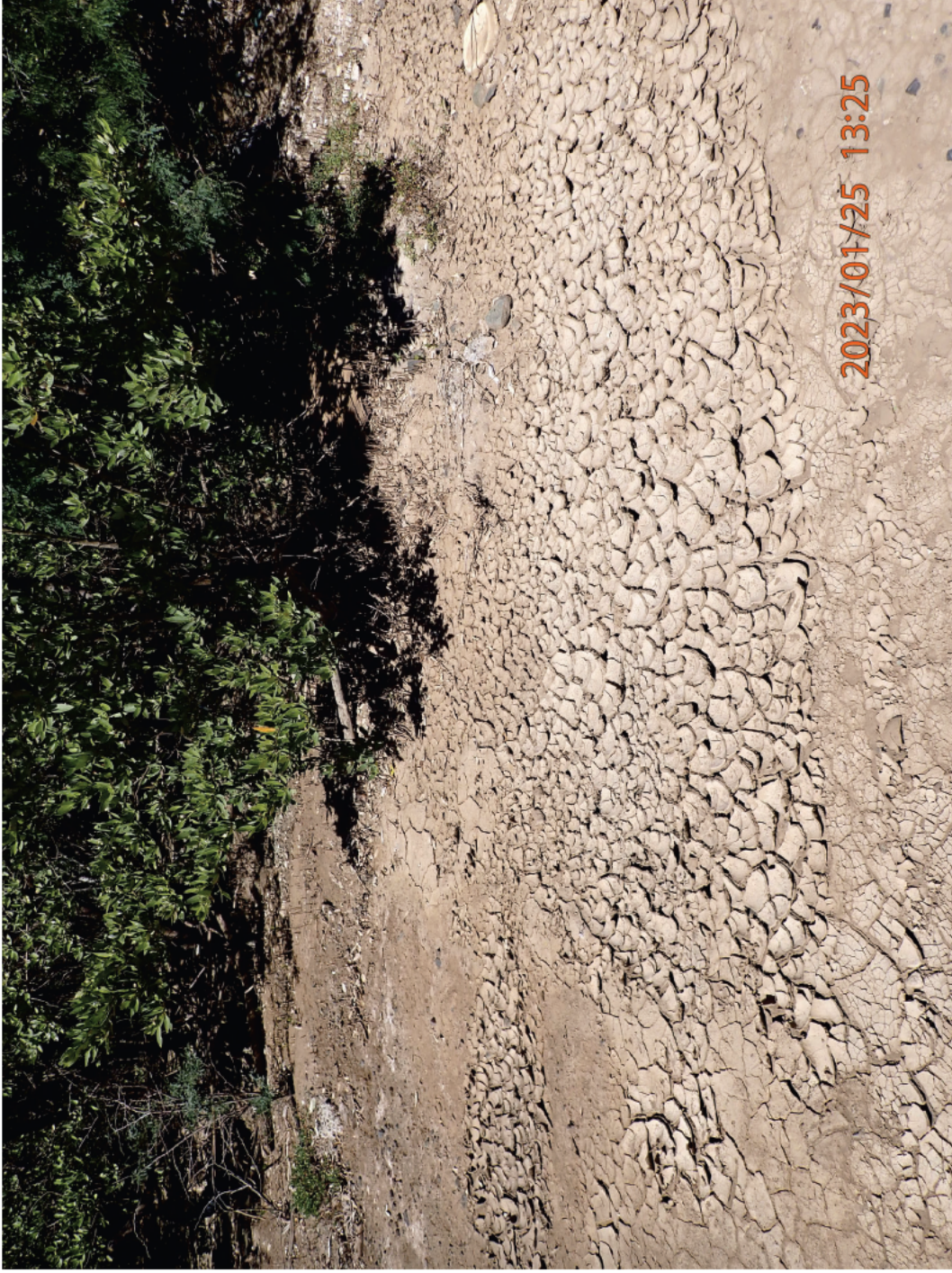
Photographer: Yolianne Maclay

Photo ID: P1250560

Description: View of the neighboring property, tax Parcel 417-000-006-04-998 from the top of the permanent bridge structure.

*Red arrows marks the direction of the flow of Rio Nigua.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:25 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250543

Description: Surface soil cracks can be found throughout the Site.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico



Date: January 25, 2023

Time: 1:30 PM

Photographer: Sofia Olivera Lora

Photo ID: P1250543

Description: Fresh crab burrows found throughout the Site.

Tax parcel number 416-000-010-11-000 in the Municipality of Salinas, Puerto Rico