

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2**

In the Matter of:

Oil Energy Systems, Inc.
Arecibo, Puerto Rico

Respondent

In a proceeding under Section 113(a)(3)
of the Clean Air Act, 42 U.S.C. § 7413(a)(3)

NOTICE OF VIOLATION
CAA-02-2024-1304

SUMMARY

The United States Environmental Protection Agency (“EPA”) Region 2 Director of the Caribbean Environmental Protection Division (“CEPD Director”) issues this Notice of Violation (“NOV”), consistent with Section 113(a)(1) of the Clean Air Act (“CAA” or “the Act”), 42 U.S.C. § 7413(a)(1), to Oil Energy Systems, Inc. (“OES” or “Respondent”), the owner and operator of a used oil processing facility located at PR-2 Km. 62.5 in the municipality of Arecibo, Puerto Rico (“Used Oil Facility”) and a new unit that Respondent refers to as a pyrolysis unit (hereinafter referred to as “Pyrolysis Unit”) located on the same premises. EPA alleges that Respondent violated certain requirements of the Puerto Rico Regulations for the Control of Atmospheric Pollution (“RCAP”) that have been incorporated into the Puerto Rico State Implementation Plan (“SIP”).

STATUTORY, REGULATORY AND PERMITTING BACKGROUND

1. Section 302(e) of the Act, 42 U.S.C. § 7602(e), provides that the term “person” includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent, or employee thereof.
2. Section 113(a)(1) of the Act, 42 U.S.C. § 7413(a)(1), provides, in relevant part, that whenever the EPA Administrator finds, on the basis of any information available to the Administrator, that any person has violated or is in violation of any requirement or prohibition of a SIP, the Administrator shall notify the person and the state in which the SIP applies of such finding. Section 113(a)(1) further provides that 30 days after providing such notice, the EPA Administrator may take various actions to address the violation(s).
3. Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3), authorizes the Administrator to, among other actions, issue an administrative penalty order or bring a civil action against any person whenever, on the basis of any information available to EPA, the Administrator finds that such person has violated, or is in violation of, any requirement or prohibition of Title I of the Act.
4. Section 114 of the Act, 42 U.S.C. § 7414, authorizes the EPA Administrator or his authorized representatives to have access to air emissions facilities and records of those facilities and to require sampling of emissions, monitoring, record-keeping, and reporting of information, among other things, to enable him or her to carry out any provision of the Act (except certain provisions in Title II) and to assess compliance with those requirements.

5. The CEPD Director is authorized by the EPA Administrator through the EPA Region 2 Regional Administrator to make findings of violations, issue notices thereof, and gather information, pursuant to Sections 113 and 114 of the Act. *See* EPA Delegation of Authority 7-6-A; EPA Region 2 Delegation of Authority 7-6-A; EPA Delegation of Authority 7-8; EPA Region 2 Delegation of Authority 7-8.

Commonwealth of Puerto Rico Regulations for the Control of Atmospheric Pollution
6. Pursuant to the Puerto Rico Environmental Public Policy Act Law No. 9 of June 18, 1970¹, the Puerto Rico Environmental Quality Board (“EQB”) developed the Puerto Rico Regulations for the Control of Atmospheric Pollution (“RCAP”).
7. By virtue of Law 122 of December 18, 2017, EQB’s functions, services, programs and/or powers were transferred to the Puerto Rico Department of Natural and Environmental Resources (“DNER”).²
8. On January 22, 1997, EPA approved DNER’s RCAP, as submitted to EPA on September 29, 1995, as part of the federally approved State Implementation Plan (“SIP”) for the Commonwealth of Puerto Rico. 62 Fed. Reg. 3211.
9. RCAP Rule 102 contains the following relevant definitions:
 - a. “air pollutant” means dust, fumes, mist, smoke, other particulate matter, vapors, gases, odors, physical, chemical, biological, or radioactive substances, or any combination thereof, but not including uncombined water vapor.
 - b. “air pollution control equipment” means any process equipment, device, and all appurtenances thereto, used for eliminating, reducing, or controlling the emission of any air pollutant.

¹ Repealed and superseded by Act No. 416 of September 22, 2004.

² All actions taken by the EQB prior to December 18, 2017, will be referenced as actions taken by the DNER.

- c. “applicable rules and regulations” means all rules and regulations promulgated under the Environmental Public Policy Act (Law No. 9, June 18, 1970, as amended) and the CAA for the control of atmospheric pollution, including but not limited to:
 - i. All requirements established by these regulations or any other applicable laws or regulations of the Commonwealth of Puerto Rico;
 - ii. The “Standards of Performance of New Stationary Sources”;
 - iii. The “National Emission Standards for Hazardous Air Pollutants”;
 - iv. Any other requirements established by the government of the United States under the CAA as amended;
 - v. Any other requirement established by DNER to insure the attainment and maintenance of the National Ambient Air Quality Standards.
- d. “construction” means any physical change or change in the method of operation (including fabrication, erection or installation) which will result in an increase in emissions.
- e. “emission” means the release or discharge of air pollutants into the ambient air.
- f. “emissions unit” means any part or activity of a stationary source that emits or has the potential to emit any air pollutant subject to applicable rule and regulations.
- g. “owner or operator” means any person who owns, leases, operates, controls or supervises a source or facility.
- h. “person” means any person, natural or juridical, or group of persons, private or public, including agencies, government bodies, municipalities and public quasi-public corporations.

- i. “source” means any structure, building, facility or installation (or combination thereof), which is located on one or more contiguous or adjacent properties under common ownership or operation, which emits or may emit any air pollutants.
10. RCAP Rule 203 (A) (Permit to construct a source or modification) establishes that no person shall construct or modify a source without a permit from DNER.
11. RCAP Rule 203 (B) (Standards for granting a permit to construct) establishes that a permit to construct or modify a source shall be granted only if the applicant demonstrates, among other things, that, to the satisfaction of DNER, the source shall be able to comply with all applicable rules and regulations; and that air pollutant emissions from the source will be limited in accordance with applicable rules and regulations. *See* RCAP, Rule 203 (B)(1) and (4).
12. RCAP Rule 203(C) (Application for a permit to construct) establishes that each application for a permit to construct or modify a source shall include, among other things, detailed plans and specifications of the emissions and of any air pollution control equipment or measures proposed to be installed and constructed to achieve compliance with applicable rules and regulations; a layout plan of the source (projected and existing), indicating all air pollutant discharge, ventilation, exhaust and release points; and detailed plans and specifications of the source including: location, height of the emissions points, fuel used, process details, concentration and duration of emissions. *See* RCAP, Rule 203 (C) (1) (a), (c), and (h).
13. RCAP Rule 204 (A) (1) (Permit to operate a source; Permit required) establishes that no person shall operate or cause the operation of a source or air pollution control equipment without a permit to operate or a temporary permit to operate from DNER.

14. RCAP Rule 204 (A) (3) establishes that no person shall operate or cause the operation of an existing source without an operation permit or without the required application of renewal provided that the operation conditions previously approved by DNER are the same or are unchanged.

FINDINGS OF FACT

The following findings of fact are based, among other things, on a site visit and an inspection of OES's Used Oil Facility and Pyrolysis Unit:

15. Respondent owns and operates a used oil processing facility located at PR-2 Km. 62.5 in the municipality of Arecibo, Puerto Rico.
16. After receiving complaints about strong odors being emitted from Respondent's Used Oil Facility from representatives of the communities west and north of the Used Oil Facility, EPA Region 2 visited the Used Oil Facility on August 4, 2023, along with DNER Arecibo Regional Office staff. The community representatives had stated that the strong odors were recurrent in the area and community members regularly noticed the smells.
17. After arriving at OES, EPA and DNER representatives were received by Respondent's representatives, and were joined by OES's consultant by phone. The Respondent's consultant representatives were notified that the joint site visit was due to a series of odor complaints received by the EPA and DNER from the community representatives. EPA did not conduct a formal inspection of the Used Oil Facility and the Pyrolysis Unit. Instead, EPA collaborated with DNER to investigate the possible causes of the strong odors being reported by complainants and discussed potential mitigation and correction plans.

18. Respondent's representatives along with EPA and DNER personnel conducted a walkthrough to learn about the Used Oil Facility's operation and to determine whether there were any detectable odors.
19. Respondent's representatives demonstrated and described the activities that the Used Oil Facility conducts to recycle and recover oil from used oil filters.
20. After completing a walkthrough of the used oil receiving area of the Used Oil Facility, EPA representatives asked OES' representatives to provide access to a newer building located south of the Used Oil Facility. OES representatives stated that the building is part of a new project that consists of processing plastic waste through a Pyrolysis Unit to produce a diesel substitute. OES' representatives brought the EPA representatives and DNER personnel to an area under active construction. Within the area, a dike and concrete slabs were under construction and, according to an OES representative, were intended by Respondent to be the location for four (4) diesel storage tanks. The OES representatives stated that the diesel tanks would be used for storing the Pyrolysis Unit product and to supply diesel from the Pyrolysis Unit to the Used Oil Facility truck fleet.
21. OES's representatives along with EPA representatives and DNER personnel accessed the Pyrolysis Unit building. Inside the building, EPA and DNER observed a completely constructed Pyrolysis Unit. OES representatives explained during the visit that the Pyrolysis Unit had become operational, and several test runs had already been conducted. According to OES's representatives, the Pyrolysis Unit consists of components such as one (1) rotary kiln reactor, condensers, distillation columns, a flare, a scrubber, a cooling tower, a propane tank, and an emergency power engine. EPA representatives were able to observe these units during the visit and OES' representatives confirmed that all the units

were fully operational. Furthermore, during the site visit, Respondent's representatives confirmed that construction activities on all units were completed.

22. The EPA representatives noticed a strong odor that smelled like burnt plastic within the Pyrolysis Unit. The EPA representatives noted that the smell was detectable throughout the premises, including but not limited to, immediately outside the Pyrolysis Unit's premises where the flare and scrubber are located. At the time of the visit, OES' representatives stated that they did not know what stage the Pyrolysis Unit project permitting process was at, for either the air emission source construction permit or the air emission source operating permit.
23. On August 11, 2023, EPA received notice via email from DNER's Air Permits Division that an OES representative had submitted, for DNER's review and consideration, an air emission source construction permit application on August 11, 2023, related to the Pyrolysis Unit.
24. On August 14, 2023, EPA conducted an aerial imagery review³ of the area and confirmed that, by no later than September 2022, the building, flare, propane tank, and emergency engine for the Pyrolysis Unit had been erected.
25. On August 15, 2023, DNER confirmed that as of that date, no construction permits associated with the Pyrolysis Unit had been processed by DNER's Puerto Rico Permits Management Office.
26. On August 15, 2023, EPA spoke with the Director of the Environmental Compliance Division of the Puerto Rico Office of Permits Management. The Director was able to review their information system and confirm that no general construction permits

³ Aerial imagery from Google Earth® and MAXAR Global Enhanced GEOINT Delivery (G-EGD).

associated with the Pyrolysis Unit had been processed or approved by the Puerto Rico Permits Management Office.

27. On August 18, 2023, DNER Arecibo Regional Office personnel provided EPA with a copy of an inspection report from a July 20, 2023 inspection, dated August 16, 2023. The July 20th inspection was conducted by DNER representatives at both the Used Oil Facility and the Pyrolysis Unit. The inspection report noted many of the same issues (i.e. odors and lack of proper permits) that were later observed during the August 4, 2023 site visit. The August 16, 2023 DNER inspection report also noted that the Pyrolysis Unit's emergency power generator engine was being operated at the time of the July 20, 2023 inspection. On September 6, 2023, EPA sent an email to DNER's Arecibo Regional Office requesting copies of the air emission source construction and operating permits associated with OES's Used Oil Facility.
28. On September 18, 2023, a representative of DNER's Arecibo Regional Office responded to EPA's September 6, 2023 request via email. DNER's September 18, 2023 email indicated that only one (1) air emission source construction permit was found in their files which was related to the Used Oil Facility, issued by the Puerto Rico Environmental Quality Board on October 19, 2005 (PFE-LC-RA-07-0905-0078-I-C or "2005 Permit"). DNER shared a copy of the 2005 air emissions source construction permit which provides coverage only to the fugitive emissions associated with moving soil during building construction but not for construction of the Used Oil Facility. DNER's Arecibo Regional Office personnel was not able to find any air emission source operating permits that would cover the operation of the Used Oil Facility. The September 18, 2023, email

also contains a copy of the Used Oil Facility general construction permit issued by the Puerto Rico Permits and Regulations Office on August 19, 2005.

29. According to EPA's observations during the August 4, 2023 site visit and a review of electronic files associated with the Used Oil Facility, specifically its Spill Prevention Control and Countermeasure Site Plan, dated March 29, 2019, the Used Oil Facility is composed of at least sixteen (16) storage tanks for the storage of diesel fuel, used oil, processed oil, oil mixture, and kerosene. Also, the Used Oil Facility has at least one (1) emergency power generator. According to the information provided to EPA during the August 4, 2023 site visit, at least one of the Used Oil Facility's oil storage tanks is heated. None of this equipment is included in the single air emissions source construction permit from 2005 that DNER found in its files.
30. On September 21, 2023, a representative of DNER's Arecibo Regional Office shared with EPA the letter dated September 14, 2023, submitted by Respondent in response to the DNER Aug. 9, 2023 letter about the Pyrolysis Unit. In its response, Respondent confirms that, with respect to the Pyrolysis Unit, it submitted a general construction permit application for the Puerto Rico Permits Management Office evaluation on August 7, 2023, and that it also submitted an air emission source construction permit to DNER's Engineering and Permits Division on August 11, 2023.
31. The EPA obtained a copy of Respondent's air emission source construction permit application and Emergency Response Plan on September 22, 2023, which was dated September 21, 2023 ("Sept 21, 2023, Application"). The Application indicates that OES's Pyrolysis Unit will process high density plastic and used oil and convert it to

diesel fuel through pyrolysis and distillation processes and that it will divert oil plastic quarts and oil residues from municipal solid waste landfills.

32. On April 12, 2024, EPA Region 2's CAA inspectors conducted an inspection of OES's Pyrolysis Unit (April 2024 Inspection).

33. The following is a list of the main topics discussed during the April 2024 Inspection opening meeting:

- a. Air emission source construction permit status;
- b. Pyrolysis Unit operational status;
- c. Pyrolysis Unit operational scenarios;
- d. Procedures and training;
- e. Emission control devices;
- f. Product; and
- g. Used Oil Facility.

34. The following is a summary of the observations during the April 2024 Inspection walkthrough:

- a. The Respondent was storing plastic material within the Pyrolysis Unit building. Several large cardboard boxes were observed shelved in pallets racks. Some of the cardboard boxes were full of shredded plastic material.
- b. The Respondent's representatives explained that OES is receiving plastic material and shredding it to maximize storage space.
- c. The Respondent has a weighing station for the shredded plastic material.
- d. A shredder unit was observed in operation. Several operators were observed placing the plastic material in an open table to sort the material prior to being shredded. The

Respondent's representatives explained that operators inspect the material and discard any non-plastics or domestic waste.

- e. According to the Respondent's representatives, the Pyrolysis Unit is projected to operate 24 hours with 3 shifts with 5-6 operators each.
- f. The Respondent's representatives confirmed that the Pyrolysis Unit product storage tanks will include two (2) 100,000 gallons tanks, one (1) 200,000 gallons tank and one (1) 400,000 gallons tank.
- g. The Pyrolysis Unit has one (1) rotary kiln reactor. The reactor has a burner box on which propane and excess syngas are used as fuel. The Respondent's representatives explained that the combustion gases that are generated as part of the burner box and the enclosure of the rotary kiln are collected and conveyed through a wet scrubber. The Respondent's representatives further explained that the syngas is generated as a result of the pyrolysis process within the reactor and that, prior to being used as supplemental gas in the rotary kiln burner box, it is treated using a series of catalysts, heat exchangers and scrubbers. The Respondent's representatives also mentioned that the excess syngas that it is not used as supplemental gas, is conveyed, and treated through a thermal oxidizer.
- h. The Respondent's representatives explained that cardboard boxes are not going to be inserted in the reactor and that OES is considering acquiring plastic sacks to place the material in the reactor.
- i. The EPA inspectors were led outdoors where the Pyrolysis Unit thermal oxidizer and wet scrubber are located. The EPA inspectors informed the Respondent's representatives that both units are starting to show corrosion issues and that the wet

scrubber is identified as a dust collector in the process layout that was included in the Pyrolysis Unit air emission source construction permit application.

- j. The thermal oxidizer observed by the EPA inspectors is equipped with a flame arrestor.
- k. At the time of the inspection there was a contractor working on construction activities on two (2) of the Pyrolysis Unit's storage tanks. Construction activities on two (2) out of the four (4) storage tanks had already been completed.
- l. The Pyrolysis Unit has one (1) diesel burning emergency power generator and one (1) propane (liquified) storage tank of 1,000 gallons. The emergency power generator brand is Stamford and the engine is a Volvo Penta, and the unit has an internal diesel storage tank (double wall) of 1,300 gallons. The EPA inspectors verified the engine run time meter and it showed a run time of 2,255 hours and 43 minutes. The engine run time meter also showed that the unit was started 327 times. The EPA Representatives asked Respondent's representatives about the reason for these frequent engine operations. The Respondent's representatives explained that the Pyrolysis Unit building is not connected to Puerto Rico's power grid and that they are relying on a temporary power connection from OES's Used Oil Facility and the emergency engine to maintain activities within the Pyrolysis Unit building.
- m. After completing the walkthrough, the EPA inspectors proceeded with the inspection closing meeting.

- n. The EPA inspectors informed the Respondent’s representatives that a follow up email⁴ would be sent by EPA to OES with a list of questions and information that will be evaluated as part of the post inspection activities.
35. The Air Compliance Inspection Report for the EPA’s April 12, 2024, onsite CAA inspection of OES was sent to the Respondent’s representatives on May 14, 2024, via email.
36. Based on EPA’s April 2024 Inspection and subsequent EPA communication with DNER, as of mid-May 2024 Respondent’s Used Oil Facility and the Pyrolysis Unit remained without the required air emission source construction and operating permits.

CONCLUSIONS OF LAW

Based on the Findings of Fact set forth above, EPA reaches the following conclusions of law:

37. Respondent is a “person” within the meaning of Section 302(e) of the Act, 42 U.S.C. § 7602(e), and the Puerto Rico RCAP Rule 102.
38. Respondent is the owner and operator of the Used Oil Facility and Pyrolysis Unit described in this Notice of Violation, within the meaning of RCAP Rule 102.

Pyrolysis Unit

39. The Pyrolysis Unit is an “emission unit” and/or “source” within the meaning of RCAP Rule 102.
40. Respondent is in violation of RCAP Rule 203 as approved into the SIP on January 22, 1997, 62 Fed. Reg. 3211, by failing to apply for and obtain a permit to construct an air emission source prior to the construction and installation of the Pyrolysis Unit.

⁴ On April 18, 2024, EPA sent an email requesting Respondent to provide further information about the Pyrolysis Unit. The information was provided by Respondent on April 26, 2024.

41. Respondent is in violation of RCAP Rule 204(A)(1) as approved into the SIP on January 22, 1997, by operating the Pyrolysis Unit without an air emission source operation permit.

Used Oil Facility

42. The Used Oil Facility is an “emission unit” and/or “source” within the meaning of RCAP Rule 102.
43. Respondent is in violation of RCAP Rule 203 as approved into the SIP on January 22, 1997, 62 Fed. Reg. 3211, by failing to apply for a permit to construct or modify an air emission source permit prior to the construction and installation of the Used Oil Facility.
44. Respondent is in violation of RCAP Rule 204(A)(1) as approved into the SIP on January 22, 1997, by operating the Used Oil Facility without an air emission source operation permit.

ENFORCEMENT

Section 113(a)(1) and (3) of the CAA, provides that the Administrator may bring a civil action whenever, on the basis of any information available to the Administrator, if the Administrator finds that any person has violated or is in violation of any requirement rule or permit issued under the provisions of Section 113 of the CAA. The Administrator shall notify the person and the State in which the plan applies of such a finding. At any time after the expiration of thirty (30) days following the date this Notice of Violation is issued, the Administrator may, without regard to the period of violation (subject to section 2462 of title 28):

- a. issue an order requiring such person to comply with the requirements or prohibitions of a SIP or permit;
- b. issue an administrative penalty order in accordance with CAA Section 113(d); or

- c. bring a civil action in accordance with CAA Section 113(b) for civil penalties and/or injunctive relief.

The amount of civil penalties that may be recovered, for violations such as those discussed above, under the CAA and its implementing regulations is set by statute at not more than \$25,000 per day for each violation, but has been adjusted over time as required by the Federal Civil Penalties Inflation Adjustment Act of 1990 (28 U.S.C. § 2461 note; Pub. L. 101-410), as amended by the Debt Collection Improvement Act of 1996, and most recently, by the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015 (28 U.S.C. § 2461 note; Pub. L. 114-74, Section 701). For civil penalties for violations that occurred after November 2, 2015, and are assessed on or after January 6, 2023, this daily penalty maximum is adjusted to \$117,468 for judicial actions, and \$55,808 for administrative actions. *See* 40 C.F.R. Part 19, Table 1.

Furthermore, for any person who knowingly violates any requirements or prohibition of an applicable SIP and permit for more than 30-days after the date of the issuance of an NOV, Section 113(c) of the Act provides for criminal penalties or imprisonment, or both. In addition, under Section 306 of the Act, the regulations promulgated thereunder (40 C.F.R. Part 15), and Executive Order 11738, facilities to be utilized in federal contracts, grants and loans must be in full compliance with the Act and all regulations promulgated pursuant thereto. Violation of the Act may result in the subject facility, or other facilities owned or operated by Respondent, being declared ineligible for participation in any federal contract, grant, or loan program.

PENALTY ASSESSMENT CRITERIA

Section 113(e)(1) of the Act provides that if a penalty is assessed pursuant to Section 113 of the Act, EPA or the court, as appropriate, shall, in determining the amount of the penalty to be

assessed, take into consideration the size of the business, the economic impact of the penalty on the business, the violator's full compliance history and good faith efforts to comply, the duration of the violation as established by any credible evidence (including evidence other than the applicable test method), payment by the violator of penalties previously assessed for the same violation, the economic benefit of non-compliance, the seriousness of the violation, and other factors as justice may require.

Section 113(e)(2) of the Act allows EPA or the court, as appropriate, to assess a penalty for each day of violation. In accordance with Section 113(e)(2) of the Act, EPA will consider a violation to continue from the date the violation began until the date Respondent establishes that it has achieved continuous compliance. If Respondent proves that there was an intermittent day of compliance or that the violation was not continuous in nature, EPA will reduce the penalty accordingly.

OPPORTUNITY FOR A CONFERENCE

Respondent may request a conference with EPA concerning the violations alleged in this NOV. This conference will enable Respondent with an opportunity to advise the Agency of any further information the EPA should consider with respect to the alleged violations and to present evidence bearing on the finding of violations, on the nature of the violations, and on any efforts it may have taken or proposes to take to achieve compliance. Respondent has the right to be represented by counsel. A request for a conference must be made within 10-days of receipt of this NOV. A request for a conference or other inquiries concerning the NOV should be made via electronic mail or in writing to:

Nancy Rodríguez, Chief
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency - Region 2
City View Plaza II – Suite 7000
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Guaynabo, Puerto Rico 00968-8073
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Attn: Alex Rivera, Enforcement Officer
rivera.alex@epa.gov
Gloria Diaz-Galarza, Enforcement Officer
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If you are represented by counsel, your counsel may contact:

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290 Broadway, Floor 16
New York, NY 10007
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By offering the opportunity for a conference or participating in one, EPA does not waive or limit its right to any remedy available under the CAA. Also, notwithstanding this NOV and the opportunity for conference, Respondent must comply with all applicable requirements of the CAA.

For United States Environmental Protection Agency, Region 2:

Date: August 16, 2024

**CARMEN
GUERRERO PEREZ**

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Carmen R. Guerrero
Director
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency - Region 2

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