



Region 2 Caribbean Environmental Protection Division
Multimedia Permits and Compliance Branch – Air Protection Team

CAA Site Visit Report

Inspection Date: August 4, 2023

Facility Name: Borinquen Container Corp.

Facility Address: State Road PR-2 Km 85.2, #800 Mangotín Sector, Carrizales Ward, Hatillo, Puerto Rico

Coordinates: Latitude: 18.478396 Longitude: -66.803546

Facility Contact(s): Milton Rosa, Manufacturing Officer, mrosa@borinquengroup.com

EPA Inspector(s): Alex O. Rivera, Environmental Engineer, (787) 977-5845, rivera.alex@epa.gov;
Gloria Diaz-Galarza, Environmental Engineer, (787) -977-5882,
diaz-galarza.gloria@epa.gov

State Inspector: Raúl Burgos, Puerto Rico Department of Natural and Environmental Resources (“DNER”) Arcibo Regional Office

I. Facility Description and Background

Borinquen Container Corp. operates a corrugated cardboard and fiber drum packaging manufacturing facility located at State Road PR-2 Km 85.2, #800 El Mangotín Sector, Carrizales Ward, in the municipality of Hatillo, Puerto Rico (“BCC or “Facility”). The Facility started operations in 1969. Among BCC emission sources, the Facility operate two (2) boilers for providing steam to their manufacturing processes. After receiving complaints from representatives of the community adjacent to the Facility about opaque black smoke emissions being emitted from BCC boilers, on June 15, 2023, EPA Region 2 sent an Information Request Letter to Respondent pursuant to Section 114 of the Clean Air Act (“114 Letter”).

II. Site Visit Purpose

An unannounced site visit was conducted with the purpose of investigating the alleged black smoke emissions from BCC’s boilers and discuss the information submitted through the 114 Letter.

III. Site Visit Summary

EPA’s Alex Rivera and Gloria Diaz-Galarza (“EPA Inspectors”) along with DNER’s Arcibo Regional Office Raúl Burgos arrived at the Facility surroundings at around 1:30 PM. The EPA Inspectors along with Mr. Burgos drove around the Facility surroundings and parked near the Facility to observe the Facility boilers stacks. The EPA Inspectors did not observe any black smoke emissions from approximately 1:30 PM through 2:00 PM. Also, during that period, two residents of the community adjacent to the Facility approached the Government

Owned Vehicle and informed the EPA Inspectors and Mr. Burgos about the frequent black emissions from the Facility boilers stacks, showed videos and described how the issue is affecting the community. After listening to the residents, the EPA Inspectors decided to access the Facility and discuss the issue with the Facility. The EPA Inspectors and Mr. Burgos accessed the Facility around 2:15 PM and were received by Mr. Milton Rosa, Manufacturing Officer. The following is a summary of the conversation with Mr. Rosa:

- a. Inspector Rivera told Mr. Rosa that the purpose of the visit was to investigate the source of the emissions affecting the neighboring community and discuss the preliminary findings as a result of the 114 Letter.
- b. Mr. Rosa informed the EPA inspectors and Mr. Burgos that BCC already submitted the air emission source permit application for DNER's evaluation in 2021.
- c. Mr. Rosa acknowledged that the Facility boilers have been generating events of high opacity periods due to issues with the boilers fuel metering pump. Mr. Rosa further stated that the company had replaced the boilers' fuel metering pumps several times until August 3, 2023, when the Facility boilers maintenance contractor installed a fuel oil controller with a metering valve. Mr. Rosa indicated that such repair should maintain an adequate fuel-to-air mixture and proper combustion and added that at the time of the site visit he was not aware of any opacity issue. Further, Mr. Rosa told the EPA inspector that BCC's boiler maintenance contractor also conducted the required boilers tune up on August 3, 2023, and that the tune up report was shared with EPA.
- d. Inspector Rivera acknowledged receiving the boiler's August 3, 2023, tune up report and asked Mr. Rosa about the recommendation included in the report to open Boiler 2 for inspection and how often BCC should conduct this type of maintenance activity. Mr. Rosa stated that BCC normally opens the boilers for maintenance at least every six (6) months. The EPA inspector asked Mr. Rosa about the possibility of conducting such maintenance in a more frequent basis, such as every three (3) months, and Mr. Rosa indicated that opening the boilers for maintenance every three (3) months would be doable, convenient, and would improve the boilers' overall performance.
- e. Mr. Rosa told Inspector Rivera that the boilers burn Fuel No. 5 with a usual sulfur content of around 0.37%. Inspector Rivera asked Mr. Rosa about the copy of the permit application that was presented for DNER's evaluation, which proposes a scenario for burning Fuel No. 5 at a maximum of 1.47% sulfur content. Mr. Rosa explained that such was the scenario that was allowed in the air emission source operating permit issued in 2008. The EPA inspector then informed Mr. Rosa that under such scenario (Fuel No. 5 with a sulfur content of 1.47%) the Facility boilers' emissions would exceed the 100 tons/yr of SO₂ emissions. Mr. Rosa stated that if that is the case, BCC will be interested on modifying the application presented to DNER to propose a lower sulfur content.
- f. The EPA inspector also asked Mr. Rosa about the possibility of burning a fuel with a lower sulfur content, such as propane or diesel. Mr. Rosa stated that although the units are currently capable of burning propane, they have conducted tests in the past and deemed propane as not economically feasible. Mr. Rosa further explained that due to the lower heating content of propane, they need to use four times more propane than the Fuel No. 5, increasing the cost significantly. Mr. Rosa then stated that for BCC to burn diesel, it will need to modify the boilers and replace its burners.

IV. Closing Meeting

The EPA Inspectors concluded the site visit and expressed gratitude to Mr. Rosa for the assistance during the site visit and concluded the visit at 3:00 PM.

Inspection Report Sign-off

Inspector's Name: Alex O. Rivera

ALEX RIVERA  Digitally signed by ALEX RIVERA
Date: 2023.08.15 11:36:38 -04'00'

Supervisor's Name: Nancy Rodríguez

NANCY RODRIGUEZ  Digitally signed by NANCY RODRIGUEZ
Date: 2023.08.15 11:57:14 -04'00'