



Region 2 Caribbean Environmental Protection Division  
Multimedia Permits and Compliance Branch

CAA Inspection Report

**Inspection Date:** 6/17/2024  
**Facility Name:** Cortes Industrial Organization Inc.  
**Facility Address:** Rio Cañas Industrial Park, Central Street, North Corner, Caguas, PR 00725  
**Coordinates:** Lat: 18.298767 / Long: -66.052418  
**ICIS-Air ID #:** PR0000007202500135  
**EPA Lead Inspector:** Alex Rivera, Enforcement Officer, [rivera.alex@epa.gov](mailto:rivera.alex@epa.gov), 787-977-5845  
**Facility Contact(s):** Yanelle Pérez, General Manager, 787-607-9029, [yperez@cortesindustrial.com](mailto:yperez@cortesindustrial.com)  
Ken Bonilla, Plant Manager, 787-643-4341, [kbonilla@cortesindustrial.com](mailto:kbonilla@cortesindustrial.com)  
Angel L. Bastardo, Plant Manager Assistant, 787-477-0864, [angelb@cortesindustrial.com](mailto:angelb@cortesindustrial.com)

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with Clean Air Act (“CAA”) regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Summary of Onsite Observations

A. Opening Conference

United States Environmental Protection Agency (USEPA) inspector Alex Rivera (the “inspector”) arrived at the Cortes Industrial Organization Inc. facility located at Rio Cañas Industrial Park in Caguas, PR (“Cortes” or “the Facility”) at approximately 10:30 am. The inspector was met upon arrival by Mr. Angel Bastardo, Plant Manager Assistant. The inspector was escorted by Mr. Bastardo to a conference room for conducting the inspection opening conference. The inspector formally presented his identification credentials, provided an overview and scope of the inspection. The inspector then proceeded with the inspection opening conference questionnaire. The following is a summary of the topics discussed:

1. The Facility started operations in Caguas, around 20 years ago. Cortes previously operated in San Juan, PR (Miramar).
2. According to Mr. Bastardo, the Facility operations consist of repairs and retrofitting of large industrial equipment. Among the operational process that are conducted on site are welding, machine shop, rewinding, cleaning, electroplating, sandblasting and vacuum pressure impregnation.
3. Cortes has around 100 employees between field operations and the Facility.
4. The Facility operation is distributed in three (3) different schedules: 1) Monday through Friday from 7:00 AM to 3:30 PM, 2) Monday through Friday from 10:00 AM to 6:30 PM, and 3) Tuesday through Friday from 7:00 AM to 3:30 PM.

5. Mr. Bastardo informed that on September 1, 2023, the Facility submitted an air emissions source operating permit modification for the Puerto Rico Department of Natural and Environmental Resources (DNER) evaluation. DNER issued a minor source air emission source operating permit PFE-LC-13-1119-0763-I-II-O (the "permit") on September 15, 2020.
6. Mr. Bastardo indicated that among the air emission sources that are operated at the Facility are five (5) paint spraying booths, two (2) vapor cleaning stations, three (3) emergency power generators, one electroplating unit, three (3) bake ovens, two (2) burn-off ovens and one (1) sandblasting unit.
7. Two (2) of the emergency power generators burn diesel fuel and the other burns liquified propane gas (LPG).
8. The Facility uses silica sand for their sandblasting activities. According to Mr. Bastardo, the Facility is interested on adding a second sandblasting unit.
9. The Facility has paint spraying and varnish application operations, for which a series of paints, varnishes and cleaning solvents are used. The inspector informed Mr. Bastardo that the permit specifies the list of paint types, colors, and amounts that can be used as part of their operations. The inspector mentioned that according to the permit, the colors are limited to red, white, and black.
10. Mr. Bastardo stated that xylene is used for dilution and common thinning products are used for cleaning purposes. Mr. Bastardo also mentioned that the Facility permit modification includes a request for increasing xylene consumption.
11. The inspector informed Mr. Bastardo that as part of the post inspection activities a request for more detailed information will be conducted, to gather further information such as types of paint, solvents and varnishes that are used at the Facility and its monthly consumption records.
12. Mr. Bastardo explained that once the retrofitted equipment (i.e. motors and pumps) are varnished, these are placed in curing ovens. The Facility has three (3) curing ovens that burns LPG and operate at temperatures of a maximum of 300°F. Each curing oven has its own stack.
13. Mr. Bastardo informed that the Facility has two (2) burn off ovens, both units burn LPG. Mr. Bastardo added that the purpose of these burn-off ovens is to burn and remove the industrial equipment coating material and that before the equipment is placed in the burn-off ovens, the equipment is cleaned, and any undesired material is removed. Each unit is equipped with two (2) burners, a primary burner that reaches temperatures up to 875°F, and a secondary burner (also known as after-burner) can reach up to 1,500°F.
14. The inspector asked Mr. Bastardo about any recent operational issues affecting the burn off ovens that could have generated odor issues in the area. Mr. Bastardo acknowledged that the Facility burn off ovens can generate odors issues if operational issues are affecting the unit. Mr. Bastardo mentioned that around the end of April 2024, the Facility stopped the operation of one of the burn-off ovens to investigate an operational issue affecting the unit and generating odors. The investigation found that the burn-off oven after-burner valve was not working as intended. According to Mr. Bastardo, the valve was replaced, and the issue was resolved. Mr. Bastardo mentioned that after that event, the Facility developed an internal procedure to avoid and manage that type of operational issue.
15. Mr. Bastardo confirmed that the Facility has two (2) water vapor cleaning stations. One station manufactured by StingRay® and the other by MART®.
16. After completing the questionnaire around 12:15 PM, the inspector proceeded to summarize the numerous odors complaints that the community have shared with EPA, spanning from May 4, 2023 through April 2024. Mr. Bastardo acknowledged that some of these odors could have been generated to the emissions from the Facility burn-off ovens. Mr. Bastardo added that after the Facility replaced the after-burner valve around the end of April 2024, no further complaints have been received. Mr. Bastardo mentioned that a procedure was prepared to prevent future issues with the after-burner valve. Mr. Bastardo added that the after-burner is the main control for any odorous gases generated in the primary burner chamber.

17. The inspection was paused for lunch at approximately 12:30 PM and was restarted at 1:30 PM.
18. Ms. Yanell Pérez, General Manager, joined the inspection. Ms. Pérez informed that Cortes was acquired by IPS company on May 24, 2024. According to Ms. Pérez, IPS operate similar facilities worldwide. Ms. Pérez added that IPS will provide substantial improvement towards environmental compliance, since the Facility will now have the support from IPS corporate Environmental Health and Safety Department.
19. The inspector provided a summary of the inspection purpose and a background about the odor complaints to Ms. Pérez.
20. Ms. Pérez informed that the Facility provide service to the island power generation plants, the Puerto Rico Electric Power Authority, the Puerto Rico Aqueduct and Sewer Authority, the Puerto Rico Ports Authority, Airports, Puerto Rico Medical Center, and other critical infrastructure. The Facility also provide service to other islands in the Caribbean.

## B. Facility Tour

At approximately 2:00 pm, Mr. Bastardo and Ms. Pérez led the inspector on a tour of the facility. The inspector explained that during the facility tour, they would capture digital images of the facility, both Mr. Bastardo and Ms. Pérez agreed. The digital images taken during the inspection are included in Appendix A. The following is a summary of the observations during the Facility walkthrough:

1. Ms. Pérez explained that equipment to be serviced is received and immediately its tagged and paperwork is prepared. An initial inspection is done to establish the type of service needed.
2. The inspector noted that the Facility paint spraying booths are not fully enclosed. Ms. Pérez explained that the pain spraying booths are open on one side and when painting is being done a blower pull air onto the side on which a filter material is located. The paint spraying booths does not have any further emission controls. The inspector noted that blue color paint was being used in one of the paint spraying booths and informed Ms. Pérez that the permit limits the type of paints to white, black and red. See images P6170042-P6170044, P6170058, and P6170060 in Appendix A for more details.
3. Mr. Bastardo informed that paint spraying booths filters are replaced in a weekly basis.
4. Mr. Bastardo showed a series of motor stator consisting of laminated core and coils of insulated wires know as windings and explained that refurbishing these motor components are part of the services provided by the Facility. See image P6170046 in Appendix A for more details.
5. Mr. Bastardo showed one of the Facility bake ovens and explained that these are used for curing and dry equipment once varnish is applied, such as the laminated motor stator windings. Mr. Bastardo indicated that the monitor the unit temperature and hours of operation, for which the unit has a temperature chart recorder and hours meter. See images P6170045, P6170047, P6170050 and P6170056 in Appendix A for more details.
6. The Facility uses a Jenkins Gen 3 series motor test system to test all motors after reassembly is completed. The motor test system uses electricity to operate.
7. Mr. Bastardo showed the Facility vacuum pressure impregnation unit, which is used for applying varnish to motors with preformed winding. See image P6170049 in Appendix A for more details.
8. Mr. Bastardo indicated that the Facility also applies varnish by submersion. The Facility has a rectangular tank on which equipment is submerged into a solution consisting of varnish and xylene (dilution). See image P6170053 in Appendix A for more details.
9. Ms. Pérez and Mr. Bastardo escorted the inspector to the rear portion of the Facility, which faces south, and on which the back part of the Facility two (2) burn-off ovens can be observed. Each burn-off oven has its own stack, and a primary and secondary burner chamber. After observing the burn-off ovens chambers, the inspector was once again escorted inside of the Facility to observe one of the burn-off ovens, which was open at the time of the inspection and had recently processed equipment placed in a crate in front of the unit front door. Mr. Bastardo showed the inspector the burn-off oven temperature

recording instrumentation. See images P6170051, P6170052, and P6170054 in Appendix A for more details.

10. The walkthrough also included observing the areas where the Facility conduct sand blasting activities, machine shop, electroplating, water vapor cleaning, the remaining paint spraying booths and the facility emergency power generation units.

At approximately 3:20 pm, the inspector concluded the walkthrough and proceeded with the inspection closing meeting.

### C. Closing Meeting

The inspector informed Mr. Bastardo and Ms. Pérez that a request for information will be sent to the Facility with a list of questions and information that will be evaluated as part of the post inspection activities. The inspectors informed that the request may contain additional items that were not discussed during the inspection. The inspector thanked Mr. Bastardo and Ms. Pérez for their time and cooperation during the inspection and informed that EPA would provide Cortes with an inspection report in approximately 60 days. At approximately 3:40 pm, the inspector departed from the facility.

## Appendices

- A. Digital Image Log

### End of Report

**Inspector's Name:** Alex Rivera

ALEX  
RIVERA

Digitally signed by ALEX  
RIVERA  
Date: 2024.08.16  
15:09:16 -04'00'

**Supervisor's Name:** Nancy Rodríguez

NANCY  
RODRIGUEZ



Digitally signed by  
NANCY RODRIGUEZ  
Date: 2024.08.16  
15:18:56 -04'00'

**Appendix A: Digital Image Log for Cortes Industrial Organization Inc., Caguas, PR**

<b>Facility Address:</b> Rio Cañas Industrial Park, Central Street, North Corner, Caguas, PR 00725	<b>Inspector:</b> Alex Rivera, EPA,	<b>Image numbers:</b> P6170037 through P6170060 <b>Camera Used:</b> Olympus Tough T-6-6 (EPA Decal # SM0134)
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**File name:** Appendix A Digital Image Log Cortes Industrial 6-17-24

Image Number	File Name	Description	Date Taken	Time taken
1	P6170037.JPG	 <p>Partial view of the south facing portion of the Facility were the burn-off ovens stacks are located.</p>	6/17/2024	10:33 am

2	P6170038.JPG	 <p data-bbox="573 716 1388 743">Partial view of the east facing portion of the Facility and its LPG storage tanks.</p>	6/17/2024	10:33 am
3	P6170039.JPG	 <p data-bbox="573 1393 1094 1421">Partial view of the west facing part of the Facility.</p>	6/17/2024	10:35 am

4	P6170040.JPG		6/17/2024	2:31 pm
		<p>Partial view of one of the Facility two steam cleaning units.</p>		
5	P6170041.JPG		6/17/2024	2:31 pm
		<p>Partial view of one of the Facility two steam cleaning units.</p>		


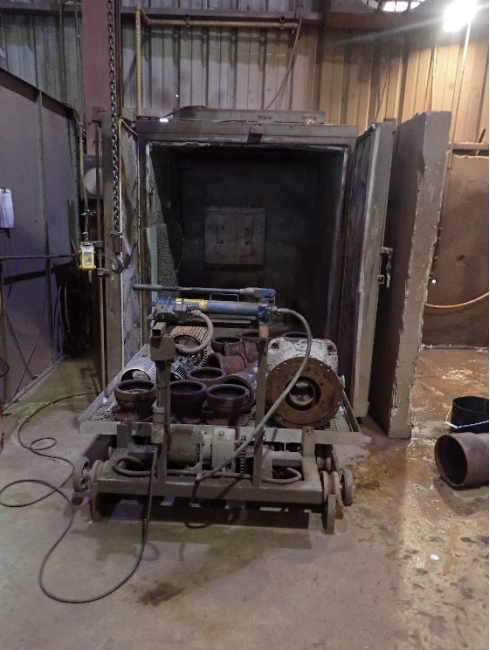
6	P6170042.JPG	 <p>A photograph showing a partial view of a paint spraying booth. A large, blue industrial motor is visible in the foreground, connected to a large, grey metal structure. The structure has a circular opening with the number '525' written on it. The background shows the interior of a large industrial facility with metal beams and pipes.</p>	6/17/2024	2:29 pm
7	P6170043.JPG	 <p>A photograph showing the interior of a paint spraying booth. A blue industrial motor is mounted on a white table in the center. The booth is equipped with various tools, hoses, and equipment. The walls are made of metal panels, and there are fluorescent lights on the ceiling. The floor is concrete.</p>	4/12/2024	11:26 am

8	P6170044.JPG		6/17/2024	2:31 pm
<p>Partial view of the inside part from one of the Facility five paint spraying booths.</p>			6/17/2024	2:39 pm
<p>Partial view of one of the Facility three bake ovens.</p>				

10	P6170046.JPG	 <p data-bbox="573 690 1501 751">Partial view of a series of motor stator consisting of laminated core and coils of insulated wires known as windings.</p>	6/17/2024	2:42 pm
11	P6170047.JPG	 <p data-bbox="573 1377 1207 1408">View of the plate from one of the Facility three bake ovens.</p>	6/17/2024	2:44 pm

12	P6170048.JPG	 <p>The image shows a circular Partlow Comparison Chart, a type of thermocouple calibration chart. It features a central hole and a grid of concentric circles and radial lines. The chart is labeled 'THE PARTLOW COMPARISON CHART' and includes various technical specifications. Handwritten data points are visible on the grid, and the chart is surrounded by a dark, textured material.</p>	6/17/2024	2:45 pm
View from one of the temperature charts used at one of the Facility three bake ovens.				
13	P6170049.JPG	 <p>The image shows a large industrial vacuum pressure impregnation unit. It consists of a large, cylindrical green base with a yellow, dome-shaped top. The unit is mounted on a yellow wooden pallet. The background shows an industrial setting with various equipment and structures.</p>	6/17/2024	2:46 pm
Partial view of the Facility vacuum pressure impregnation unit for varnish application.				

14	P6170050.JPG		6/17/2024	2:48 pm
<p>Partial view of the rear part and stack from one of the Facility two burn-off ovens.</p>			6/17/2024	2:52 pm
<p>Partial view of the rear part and stack from one of the Facility two burn-off ovens.</p>				

16	P6170053.JPG		6/17/2024	2:57 pm
<p>Partial view of the Facility for varnish application by submersion.</p>				
17	P6170054.JPG		6/17/2024	2:55 pm
<p>Partial view of one of Facility two burn-off ovens and material recently burnt-off.</p>				

18	P6170055.JPG			6/17/2024	2:56 pm
		<p>Partial view of one of the Facility two burn-off ovens temperature recording instruments.</p>			
19	P6170056.JPG			6/17/2024	2:56 pm
		<p>Partial view of one of the Facility three bake ovens.</p>			

20	P6170057.JPG		6/17/2024	3:12 pm
		<p>Partial view of a Facility machine shop equipment and component.</p>		
21	P6170058.JPG		6/17/2024	3:12 pm
		<p>View of one of the Facility five paint spraying booths.</p>		

22	P6170059.JPG		6/17/2024	3:13 pm
		Partial view of the Facility water vapor cleaning station and sandblasting unit.		
23	P6170060.JPG		6/17/2024	3:15 pm
		Partial view of one of the Facility five paint spraying booths.		