

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2**

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
2008 AUG 14 PM 2:52  
REGIONAL HEARING  
CLERK

IN THE MATTER OF:

Palmas Lakes, Inc.  
P.O. Box 191334  
San Juan, Puerto Rico 00919

and

F&R Construction Corporation  
P.O. Box 9932  
San Juan, Puerto Rico 00908

Respondents

Docket No. CWA-02-2007-3410  
Proceeding Pursuant to Section 309(g) of  
The Clean Water Act, 33 U.S.C. §1319(g)  
to Assess Class II Civil Penalties

Harbour Lakes Residential Development  
NPDES GCP Number PRR10B567

**CO-RESPONDENT PALMAS LAKES, INC.'S  
INITIAL PRE HEARING EXCHANGE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

Co-Respondent Palmas Lakes, Inc. hereby files it's Initial Pre-hearing Exchange.

In it's efforts to simplify the procedures in this case and in consideration of public policy to economize procedures, Palmas Lakes, Inc. intends and herewith so informs, to make a joint defense with co-respondent F & R Contractors, except as wherein it may be specifically disavowed.

In consideration of the above co-respondent, Palmas Lakes, Inc. here-in adopts F & R Contractors Initial Pre-hearing Exchange.

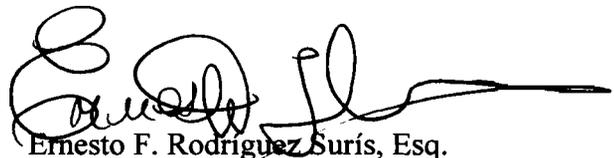
Co-respondent, Palmas Lakes, Inc. reserves the right to disavow or reject any portion of F&R Contractors Initial Pre-hearing Exchange.

Co-Respondent, Palmas Lakes, Inc., informs that in addition to any documentary evidence that may be informed by F&R Contractors, it will present plans (engineering) which evidence other areas that deposit run off water to the area in question.

**VERY RESPECTFULLY SUBMITTED.**

I HEREBY CERTIFY that on this same date copy of this motion has been mailed by certified mail to Silvia Carreño, Esq., Associate Regional Counsel, Caribbean Programs, Office of Regional Counsel, U.S. Environmental Protection Agency, Region 2, Centro Europa Suite 417, 1492 Ponce de León Ave., San Juan, Puerto Rico 00907-4127; Wanda García, P.E., Chief, Permit Section, Water Quality Division, Environmental Quality Board of PR, P.O. Box 11488, San Juan, PR 00910; and Hilda Quiñones, Esq., Adsuar Muñiz Goyco Seda & Pérez Ochoa, P.S.C., at P.O. Box 70294, San Juan, PR 00936-8294; Karen Maples, Regional Hearing Clerk, US EPA, Region II, 290 Broadway, 17<sup>th</sup> Floor, New York, NY 10007-1866; and Barbara A. Gunning, Administrative Law Judge, Office of Administrative Law Judges, U.S Environmental Agency, 1099 14<sup>th</sup> Street, N.W. Suite 350, Franklin Court, Washington D.C. 20005.

In San Juan, Puerto Rico, this August 11, 2008.



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