

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

In the Matter of:

Docket No. CAA-02-2012-1213

Puerto Rico Aqueduct and  
Sewer Authority,

Administrative Complaint  
under Section 113 of the  
Clean Air Act, 42 U.S.C.  
§7413.

Respondent.

NOTICE OF APPEARANCE AND REQUEST FOR EXTENSION OF TIME TO NOTIFY  
RESPONSIVE PLEADINGS

TO THE REGIONAL JUDICIAL OFFICER:

COMES NOW, the Puerto Rico Aqueduct and Sewer Authority  
("PRASA" or "Respondent"), thru the undersigned attorney and  
respectfully states and prays as follows:

1. Jorge Marrero Narvaez, a PRASA in-house attorney that  
had been handling the captioned matter, was upon information and  
belief, hospitalized between Sunday and Saturday (December 15<sup>th</sup> -  
16<sup>th</sup>) complaining of chest pain or discomfort.

2. In view of Mr. Marrero's condition, yesterday  
afternoon, Dec. 17, PRASA requested that our firm assume  
Respondent's legal representation in the captioned matter. PRASA  
today, Dec. 18 notified copies of case related documents from  
Mr. Marrero's file.

3. The Administrative Complaint contains factual

allegations, extending from late 2007 to late 2010, related to  
PRASA compliance with Clean Air Act, Section 112 (r), 42 U.S.C.

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sec. 7412 (r), and related 40 C.F.R. Part 68 Risk Management Program provisions at three (3) regional waste water treatment plants located in the Municipalities of San Juan, Ponce and Mayagüez.

4. The subscribing attorney will need no less than thirty (30) days, from the date of the instant motion to review necessary information, visit facilities described in the Administrative Complaint and submit Respondent's responsive allegations.

5. The hereinabove described facts constitute good cause, pursuant to Section 22.7 (b), for granting the requested extension.

**WHEREFORE**, it is respectfully requested that PRASA be granted an extension of time of thirty (30) days, counted from the date of the instant request, for submittal of responsive allegations in the instant matter.

In San Juan, Puerto Rico, this 16 day of December, 2012.

**MARTINEZ-LORENZO LAW OFFICES**

Attorneys for Respondents

Union Plaza Building - Suite 1200

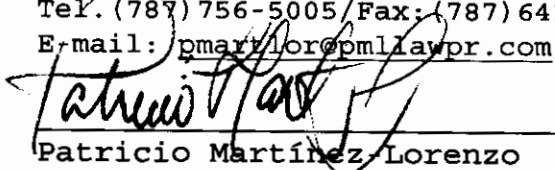
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By:

  
Patricio Martínez-Lorenzo

CERTIFICATION OF SERVICE

I hereby certify that the instant "Notice of Appearance and Request for Extension of Time to Notify Responsive Pleadings" has been sent, today, December 10, 2012, in the following manner to the addresses listed below:

Original and (1) copy, by certified mail to:

Regional Hearing Clerk  
US Environmental Protection Agency, Region 2  
290 Broadway, 16<sup>th</sup> Floor  
New York, New York 10007-1866

Copy by certified mail to:

Jocelyn Scott, Esq.  
Assistant Regional Counsel  
Office of Regional Counsel  
US Environmental Protection Agency, Region 2  
290 Broadway  
New York, NY 10007-1866

Copy by regular mail to:

Maribel Cruz de León, Esq.  
Puerto Rico Aqueduct and Sewer Authority  
Legal Division  
PO Box 7066  
San Juan, PR 00916-7066

By:



Patricio Martínez-Lorenzo