

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2**

IN THE MATTER OF

CARIBBEAN PROPERTIES INVESTMENT,  
INC.;  
VPI CONSTRUCTION, CORP.

BAHÍA MARINA RESORT  
DEVELOPMENT  
NPDES PRU201934

**RESPONDENTS**

**DOCKET NO. CWA-02-2008-3461**

PROCEEDING PURSUANT TO SECTION  
309(G) OF THE CLEAN WATER ACT  
U.S.C. §1319(G) TO ASSESS CLASS II  
CIVIL PENALTY

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
2010 OCT 12 A 9:13  
NATIONAL HEARINGS  
OFFICE

**RESPONDENTS' INITIAL PREHEARING EXCHANGE**

**TO THE HONORABLE ENVIRONMENTAL PROTECTION AGENCY  
REGION 2:**

COME NOW respondents C.P.I. Hospitality, Inc. and V.P.I. Construction, Corp., through the undersigned counsel, and respectfully state, and pray as follows:

1. Pursuant to the Order Setting Prehearing Procedures, dated June 29, 2010, Respondents hereby submit their Initial Prehearing Exchange for the instant case.

Respectfully submitted.

In San Juan, Puerto Rico, this 5 day of October of 2010.



**Eduardo J. Mayoral García**  
Attorney for Respondents  
PR BAR No. 17025  
USDC-PR No. 224607  
PMB 157  
PO Box 194000  
San Juan PR 00919-4000  
Tel. and Fax (787) 754-2002  
emayoral@gmail.com

**A. Names of expert or other witnesses, together with summary of expected testimony.**

1. Mr. Fernando Torres, P.E. (Project manager for the construction of phase two of the Hotel)  
Mr. Torres will testify about the construction of phase two of Bahia Marina Hotel.  
Mr. Torres will describe and explain all control measures taken during construction that kept sediment or other materials from reaching beyond the project's site.
2. José Mayoral (managing partner of Bahía Marina Hotel)  
Mr. Mayoral will testify about the development of the project, and all inspections performed that different governmental agencies and financial institutions made during the construction phase of the project, as well as of the storm water control measures.
3. Eduardo J. Oliver Polanco, P.E. (Expert)  
Civil Engineer, Lic. 7248.  
Mr. Oliver Polanco will testify about his expert report dated October 4, 2010.
4. Javier Medina Garayalde, P.E. (engineer hired for the installation of the water tanks)  
Mr. Medina will testify about the process of installation of water tanks for the Hotel, and will also confirm the storm water control measures kept at the project.

Respondents reserve the right, and nothing herein is intended or is to be construed to prejudice or waive any such right, to call or not to call any of the aforementioned potential witnesses, and to expand or otherwise modify the scope, extent and/or areas of the testimony of any of the above mentioned potential witnesses, where appropriate. In addition, Respondents reserve the right to list and to call additional potential witnesses to answer and/or rebut any additional evidence that Complaint announces after this Prehearing Exchange is submitted.

**B. Copies of all documents and exhibits.**

1. Respondents' Exhibit 1- Answer to Administrative Complaint.
2. Respondents' Exhibit 2- C.P.I. Hospitality, Inc. virtual corporate file with the Department of state, showing the effective date of C.P.I.'s change of corporate name and address.
3. Respondents' Exhibit 3- Environmental Quality Control Permit issued for the project.
4. Respondents' Exhibit 4- Ground Photographs of the area that Complaint refers as "water flow path" (12 photographs).
5. Respondents' Exhibit 5- Expert Report prepared by Eduardo J. Oliver Polanco.
6. Respondents' Exhibit 6- Curriculum vitae of Mr. Eduardo J. Oliver Polanco.

Respondents reserve the right, and nothing herein is intended or is to be construed to prejudice or waive any such right, to supplement or add, subject to notice to the Court and Complainant, documentary evidence to Respondents' prehearing exchange submission in order to respond and/or rebut any additional evidence that Complaint announces after this Prehearing Exchange is submitted, or to otherwise update this prehearing exchange.

**C. Statement expressing its view as to the place for the hearing and estimated amount to present its case.**

Respondents' concur with Complainant's position that the most convenient location for the parties and the witnesses is the E.P.A.'s regional offices in San Juan and therefore respectfully request that the hearing be held in such place. Respondent estimates that it will need one day to present its evidence.

**D. Statement regarding why the penalty should be reduced or eliminated.**

It is respondents' position that no CWA violations have been committed in the instant case, since respondents were neither required to apply for a discharge permit, nor they discharged storm water carrying pollutants traceable into the Atlantic Ocean. Considering the penalty imposed upon respondents should be eliminated. In the alternative that this Honorable Court finds that respondents violated the CWA, respondents contend that the penalty issued should be reduced. The factors for reducing the penalty imposed are: 1) respondents implemented adequate control measures at the project; 2) there is no intermittent creek in the area, as the complainant states in its reports; 3) complainant failed to notify respondents to their correct address regarding their findings to clarify this matter, 4) the gravity component of the violation (\$45,000.00) is being imposed with no reference to actual data that corroborates threats to receiving waters and human health; 5) respondents did not receive any economic benefit since they invested considerable amounts of capital in the preventive storm water control measures; 6) Respondents have no prior history of violations.

In addition to the former, the issued penalty would cause a serious prejudice to the financial stability of the project. Since the construction was complete no units have been sold due to the serious effect that the recession has had over Puerto Rico, and especially over Culebra Island, where the project is located. As such, the project is facing threats from its creditors and the proposed penalty would further disrupt the project's delicate financial condition. Respondent is in the process of gathering the financial data to support its position.

Respectfully Submitted.

In San Juan, Puerto Rico, this 5 day of October of 2010.



**Eduardo J. Mayoral García**

Attorney for Respondents

PR BAR No. 17025

USDC-PR No. 224607

PMB 157

PO Box 194000

San Juan PR 00919-4000

Tel. and Fax (787) 754-2002

emayoral@gmail.com

I HEREBY CERTIFY that a true and exact copy of this document and its exhibits were notified to the following:

**Karen Maples**

Regional Hearing Clerk

U.S. Environmental Protection Agency

290 Broadway – 16<sup>th</sup> Floor

New York NY 10007-1866;

**Héctor L. Vélez Cruz**

Office of Regional Counsel

U.S. Environmental Protection Agency

1492 Ponce de León Ave., Suite 417

San Juan PR 00907-4127

**Hon. Barbara A. Gunning**

Administrative Law Judge

Office of Administrative Law Judges

U.S. Environmental Protection Agency

1099 14<sup>th</sup> Street, N.W. Suite 350

Franklin Court

Washington, D.C. 20005

## RESPONDENTS' EXHIBIT 1

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2**

IN THE MATTER OF

CARIBBEAN PROPERTIES  
INVESTMENT, INC.;  
VPI CONSTRUCTION, CORP.

BAHÍA MARINA RESORT  
DEVELOPMENT  
NPDES PRU201934

**RESPONDENTS**

**DOCKET NO. CWA-02-2008-3461**

PROCEEDING PURSUANT TO  
SECTION 309(G) OF THE CLEAN  
WATER ACT, 33 U.S.C. §1319(G) TO  
ASSESS CLASS II CIVIL PENALTY

**ANSWER TO COMPLAINT AND REQUEST FOR HEARING**

**TO THE HONORABLE ENVIRONMENTAL PROTECTION AGENCY  
REGION 2:**

COME NOW respondents C.P.I. Hospitality, Inc. and V.P.I. Construction, Corp., through the undersigned counsel, and respectfully state, allege and pray as follows:

**I. Statutory Authority**

Part I of the complaint, including paragraphs 1 and 2 of the complaint are neither admitted nor denied as they aver legal statements and not factual allegations. In the alternative, they are denied.

**II. Statutory and Regulatory Background**

Part II of the complaint, including paragraphs 3-13 of the complaint are neither denied nor admitted as they aver legal statements and not factual allegations. In the alternative they are denied.

### **III. Findings of Violation**

14. Paragraph 14 of the complaint is admitted. It is affirmatively alleged that on May 15, 2006, Caribbean Properties Investments, Inc. changed its corporate name to "C.P.I. Hospitality, Inc."

15. Paragraph 15 of the complaint admitted.

16. Paragraph 16 of the complaint is denied. It is affirmatively alleged that CPI is the developer of the project "Condo-Hotel Bahía Marina Resort" and VPI is the general contractor for said project.

17. Paragraph 17 of the complaint is admitted.

18. Paragraph 18 of the complaint is denied as drafted. It is affirmatively alleged that the project is a Condo-Hotel which consist of a 4 apartment buildings with 6 units per building.

19. Paragraph 19 of the complaint is neither admitted nor denied at this stage of the proceedings, since it avers a legal conclusion and not a factual allegation. In the alternative it is denied.

20. Paragraph 20 of the complaint is admitted.

21. Of paragraph 21 of the complaint it is only admitted that activities at the project involve clearing, grading and excavation. The remaining averments of paragraph 21 are denied.

22. Paragraph 22 of the complaint is denied. It is affirmatively alleged that the activities began on August 2006.

23. Paragraph 23 of the complaint is neither admitted nor denied at this stage of the proceedings since it avers a legal conclusion and not a factual allegation. In the alternative it is denied.
24. Paragraph 24 of the complaint is neither admitted nor denied at this stage of the proceedings, since it avers a legal conclusion and not a factual allegation. In the alternative it is denied.
25. Paragraph 25 of the complaint is denied. It is affirmatively alleged that in the Playa Sardinias II Ward of the Municipality of Culebra there are neither rivers nor creeks.
26. Of paragraph 26 of the complaint it is only admitted that the Atlantic Ocean are waters of the United States. The remaining averments of paragraph 26 are denied for the reasons stated in paragraph 25 of this Answer.
27. Paragraph 27 of the complaint is neither admitted nor denied at this stage of the proceedings, since it avers a legal conclusion and not a factual allegation. In the alternative it is denied.
28. Paragraph 28 of the complaint is denied.
29. Paragraph 29 of the complaint is neither admitted nor denied at this stage of the proceedings, since it avers a legal conclusion and not a factual allegation. In the alternative it is denied.
30. Paragraph 30 of the complaint is denied.
31. Paragraph 31 of the complaint is denied for lack of sufficient knowledge to state an opinion upon its veracity. In the alternative it is denied.



32. Paragraph 32 of the complaint is denied for lack of sufficient knowledge to state an opinion upon its veracity. In the alternative it is denied.

33. Paragraph 33 of the complaint is denied for lack of sufficient knowledge to state an opinion upon its veracity. In the alternative it is denied.

34. Paragraph 34 of the complaint is denied.

35. Paragraph 34 of the complaint is denied.

36. Paragraph 36 of the complaint is denied for lack of sufficient knowledge to state an opinion upon its veracity. In the alternative it is denied.

37. Paragraph 37 of the complaint is denied for lack of sufficient knowledge to state an opinion upon its veracity. In the alternative it is denied. It is affirmatively alleged that respondents took all necessary and adequate control measures to prevent that sediments and/or storm waters carrying sediments reached any area outside of the project. Among these measures is a retention pond located at the lowest point of the land where the project is situated that stores any storm water that may run off from the construction site. Moreover, even considering that these measures were not sufficient to completely prevent storm water from reaching beyond the premises of the project, it is physically impossible for this storm water to reach the Atlantic Ocean. The distance between the project and the Atlantic Ocean is approximately half a kilometer. To reach the Atlantic Ocean the water must go up and over a high hill of sandy and vegetation covered land. Therefore, it is highly unlikely for storm water that travels half a kilometer through elevated and rough land to reach the Atlantic Ocean.

38. Paragraph 38 of the complaint is denied for lack of sufficient knowledge to state an opinion upon its veracity. In the alternative it is denied.

39. Paragraph 39 of the complaint is denied for lack of sufficient knowledge to state an opinion upon its veracity. In the alternative it is denied.

40. Paragraph 40 of the complaint is denied.

41. Paragraph 41 of the complaint is denied for lack of sufficient knowledge to state an opinion upon its veracity. In the alternative it is denied.

42. Paragraph 42 of the complaint is denied for lack of sufficient knowledge to state an opinion upon its veracity. In the alternative it is denied.

43. Paragraph 43 of the complaint is neither denied nor admitted since it avers conclusions of law and not factual allegations. In the alternative it is denied.

#### **AFFIRMATIVE DEFENSES AND REQUEST FOR HEARING**

1. The complaint fails to state a claim upon which relief can be granted.
2. Laches.
3. There are neither rivers nor creeks in the Playa Sardinias II Ward of the Municipality of Culebra.
4. Respondents took all necessary and adequate control measures to prevent any sediment from reaching any area outside of the project.
5. No storm water reaches beyond the project's grounds. In the alternative, it is impossible for any storm water traceable to the project to reach the Atlantic Ocean.
6. The project does not border at any point a body of water.

7. The project is located between two hills at the lower part of one of these hills. The lowest point between the two hills is a road. Therefore, for storm water to reach the Atlantic Ocean it would need to go down the hill, across the road, and up and over the second hill to finally reach the Atlantic Ocean.
8. Moreover, the distance between the project and the Atlantic Ocean is approximately half a kilometer. This land is sandy and covered with vegetation and, therefore, it is highly unlikely for storm water that travels this distance through this rough ground to reach the Atlantic Ocean.
9. Respondents have never been notified with any report, finding or other kind of document from this Honorable Agency. If this were the case, this matter would have clarified and/or corrected if necessary.
10. Lack of due notice and due process of law.
11. Respondents' postal addresses contained in the public records of the Department of State are not the addresses that this Honorable Agency notified the complaint in this case. Therefore, this Honorable Agency has not given due opportunity for respondents to state their position and before proposing the civil penalty notified in the present complaint.
12. The proposed penalty is excessive and disproportioned to the violations described in the complaint.
13. **Hearing is requested pursuant to 40 C.F.R. §22.15(c).**

WHEREFORE it is respectfully requested from this Honorable Agency to accept and take notice of respondents' answer to the complaint and schedule a hearing to

allow respondents to present evidence to rebut the allegations stated in the complaint with any other order or ruling that it deems proper.

I HEREBY CERTIFY that this Answer to the Complaint and Request For Hearing was notified to the following persons at the addresses listed below:

Original and copy (express mail):

Regional Hearing Clerk  
U.S. Environmental Protection Agency  
290 Broadway -- 16<sup>th</sup> Floor  
New York NY 10007-1866;

Copy to (certified mail):

Héctor L. Vélez Cruz  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
1492 Ponce de León Ave., Suite 417  
San Juan PR 00907-4127

Respectfully submitted.

In San Juan, Puerto Rico, this 3 day of June of 2010.



**Eduardo J. Mayoral García**  
Attorney for Respondents  
PR BAR No. 17025  
USDC-PR No. 224607  
PMB 157  
PO Box 194000  
San Juan PR 00919-4000  
Tel. and Fax (787) 754-2002  
emayoral@gmail.com

## RESPONDENTS' EXHIBIT 2



Gobierno de Puerto Rico

# Departamento de Estado

Búsqueda de Corporaciones

## C.P.I. HOSPITALITY, INC - Detalles

Radicar Informe

## Instrucciones

[Informes Anuales En Línea](#)

### Información General

Núm. Registro	138637	Clase	Corporación
Nombre	C.P.I. HOSPITALITY, INC	Tipo	Con Fines de L
Fecha Inscripción	19/09/2003 10:54 a.m.	Jurisdicción	Doméstica
Status	Activa		
Propósito	Inversiones bienes raices, compra venta y alquiler de inmueble.		

### Dirección Oficina Designada

Dirección Física: Edificio Norfe Oficina 201  
Ave. 65th Infantería 714

Dirección Postal: Calle 13 N-1  
Quintas de Dorado

### Agente Residente

Nombre: José E. Mayoral

Dirección Física: Calle 13 N-1  
Quintas de Dorado

Dirección Postal: Calle 13 N-1  
Quintas de Dorado

### Incorporadores

Información no disponible.

### Directores

Información no disponible.

### Oficiales

Información no disponible.

### Informes Anuales, Prórrogas y/o Pago de Derechos

Año Informe	2009	Status	Radicado
Fecha Radicación	14/06/2010	Ver Documentos	
Volumen Negocio	No excede los tres millones de dólares		

Año Informe	2009	Status	Prórroga
Fecha Radicación	09/04/2010		
Volumen Negocio			

Año Informe	2008	Status	Prórroga
Fecha Radicación	15/04/2009		
Volumen Negocio			

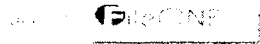
Año Informe	2008	Status	Recibido
Fecha Radicación	14/04/2009		
Volumen Negocio	Informe Anual		

Año Informe	2007	Status	Prórroga
Fecha Radicación	14/04/2008		
Volumen Negocio			

Año Informe	2006	Status	Prórroga
Fecha Radicación	16/04/2007		
Volumen Negocio			

### Transacciones Efectuadas

Tipo de Transacción	<b>Solicitud de Goodstanding</b>
Radicado:	<b>20/11/2009</b>
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Tipo de Transacción	<b>Solicitud de Goodstanding</b>
Radicado:	<b>18/03/2009</b>
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Tipo de Transacción	<b>Solicitud de Goodstanding</b>
Radicado:	<b>28/08/2008</b>
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Tipo de Transacción	<b>Solicitud de Goodstanding</b>
Radicado:	<b>26/08/2008</b>
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Tipo de Transacción	<b>Solicitud de Goodstanding</b>
Radicado:	<b>09/05/2007</b>
<hr/>	
Tipo de Transacción	<b>Cambio Oficina Designada</b>
Radicado:	<b>15/05/2006</b>
<hr/>	
Tipo de Transacción	<b>Enmienda Nombre Corporativo</b>
Radicado:	<b>15/05/2006</b>
<b>Nombres Anteriores</b>	
Nombre Anterior	<b>CARIBBEAN PROPERTIES INVESTMENTS INC.</b>
Fecha Cambio	<b>15/05/2006 12:00:00 a.m.</b>



v1.5.3.0 (01)

RESPONDENTS' EXHIBIT 3







ESTADO LIBRE ASOCIADO DE PUERTO RICO  
Oficina del Gobernador  
Junta de Calidad Ambiental

Área de Calidad de Agua

**PERMISO DE OPERACION  
CONFORME AL REGLAMENTO PARA EL  
CONTROL DE LA INYECCION SUBTERRANEA  
POR CERTIFICACION**

Por la autoridad de la Junta de Calidad Ambiental (JCA) al amparo de la Ley sobre Política Pública Ambiental (Ley Núm. 416 del 22 de septiembre de 2004) y por el Reglamento para el Control de la Inyección Subterránea (RCIS), la JCA autoriza a:

**BAHIA HONDA RESORT  
UIC-99-25-0024**

referido más adelante como el "peticionario", localizado en:

**CARRETERA 250, KM 4.5  
BARRIO PLAYA SARDINAS II  
CULEBRA, PUERTO RICO**

a operar un sistema de inyección subterránea (SIS) Clase VC-1, el cual consiste de un tanque séptico de 10 pies de ancho por 15 pies de largo por 5 pies de profundidad líquida con una capacidad de 5,699 galones y dos pozos filtrantes de 10 pies de ancho por 10 pies de largo por 5 pies de profundidad líquida, cada uno, con un área de percolación total de 600 pies cuadrados para la disposición de aguas sanitarias provenientes de cuatro (4) villas, un restaurante y la oficina de administración, en conformidad con las limitaciones del efluente, requisitos de rastreo y otras condiciones establecidas en las Partes I, II y III de este permiso.

Este permiso será efectivo a partir del 8 de octubre de 2008.

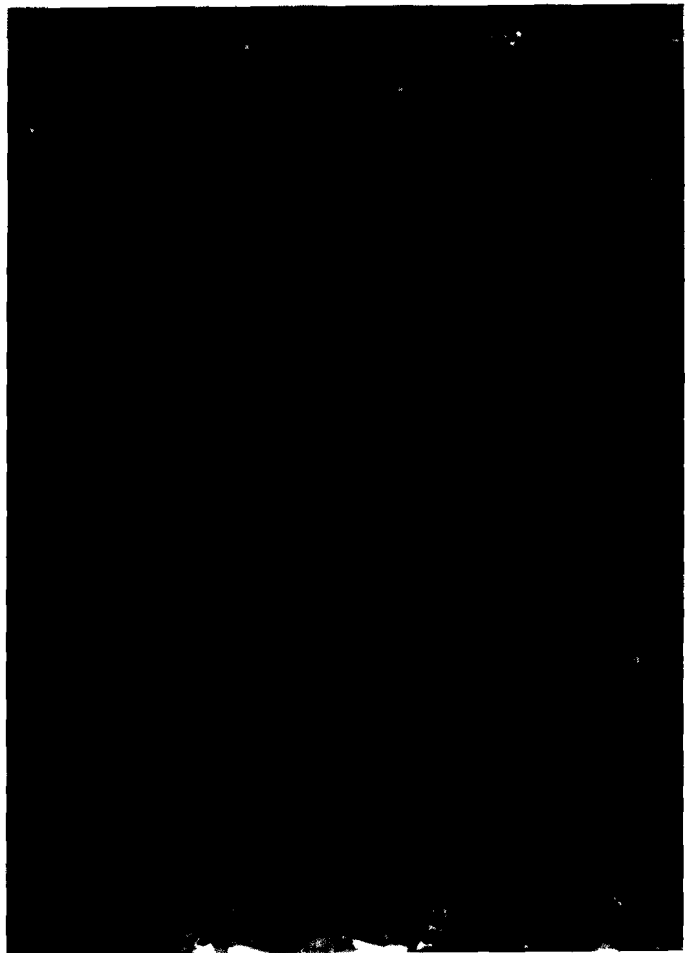
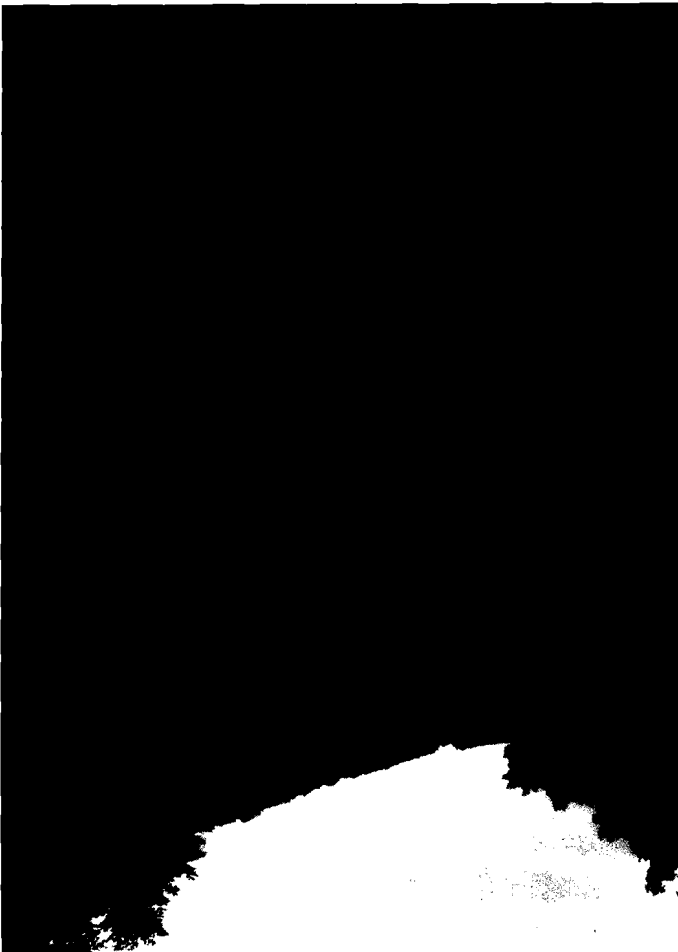
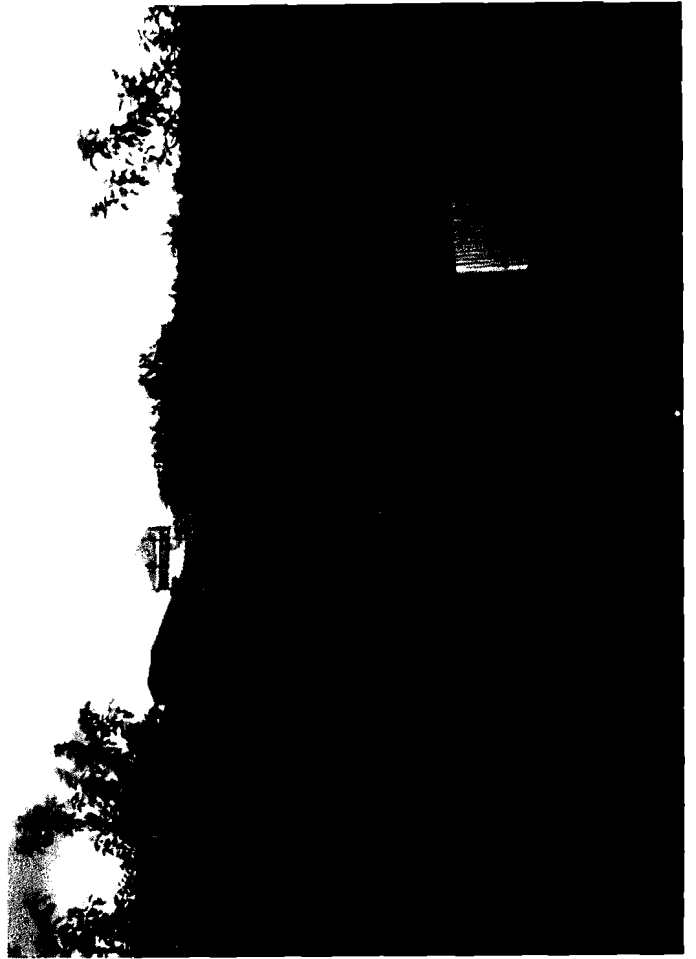
Este permiso y la autorización para operar expirará a la medianoche del 7 de octubre de 2010.

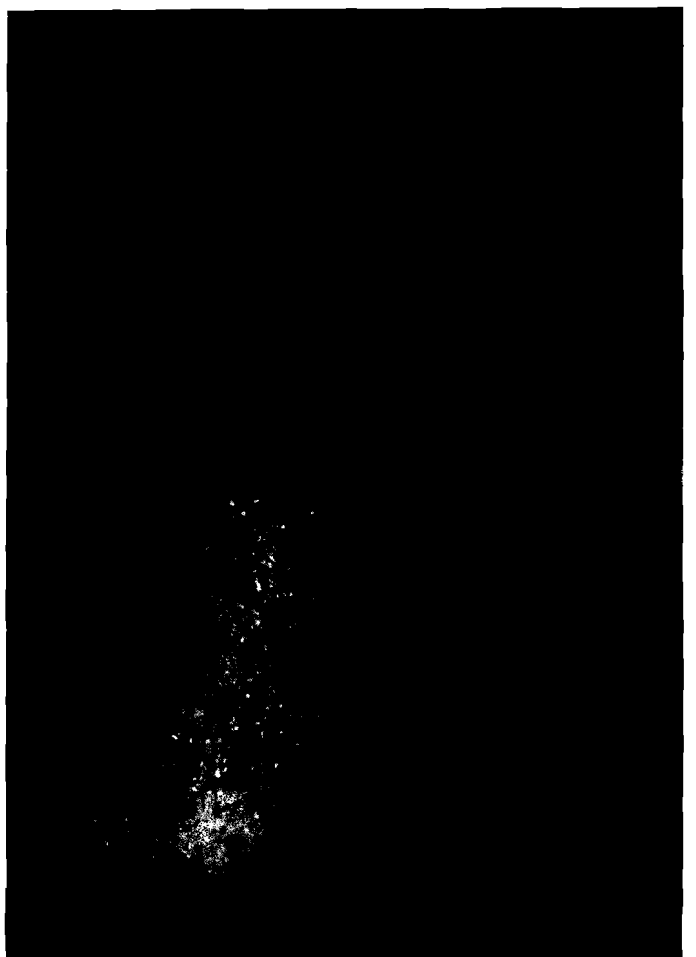
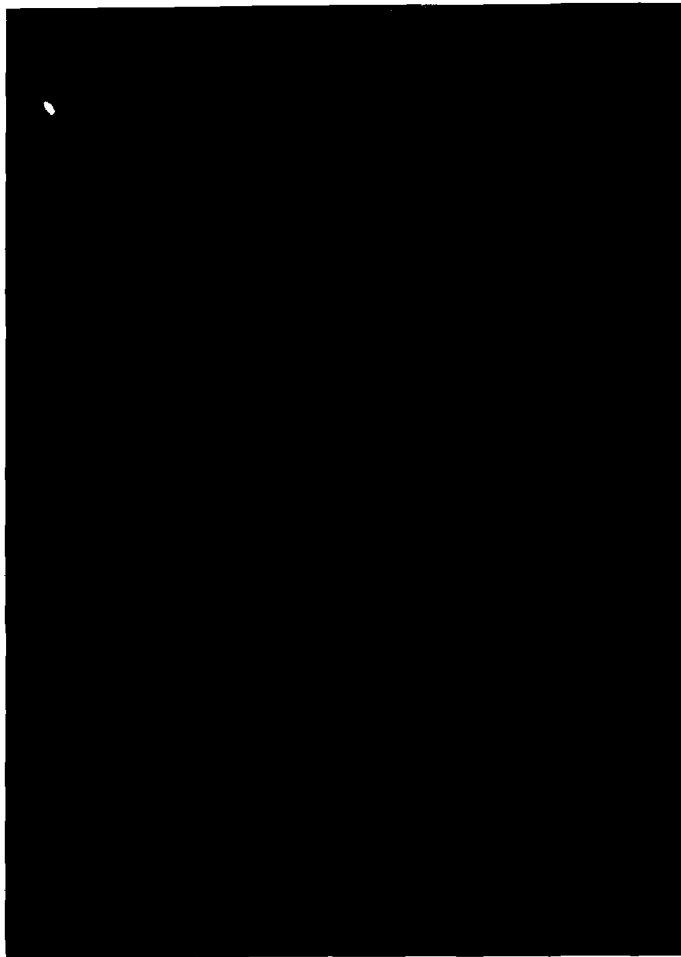
Firmado el 08 OCT 2008

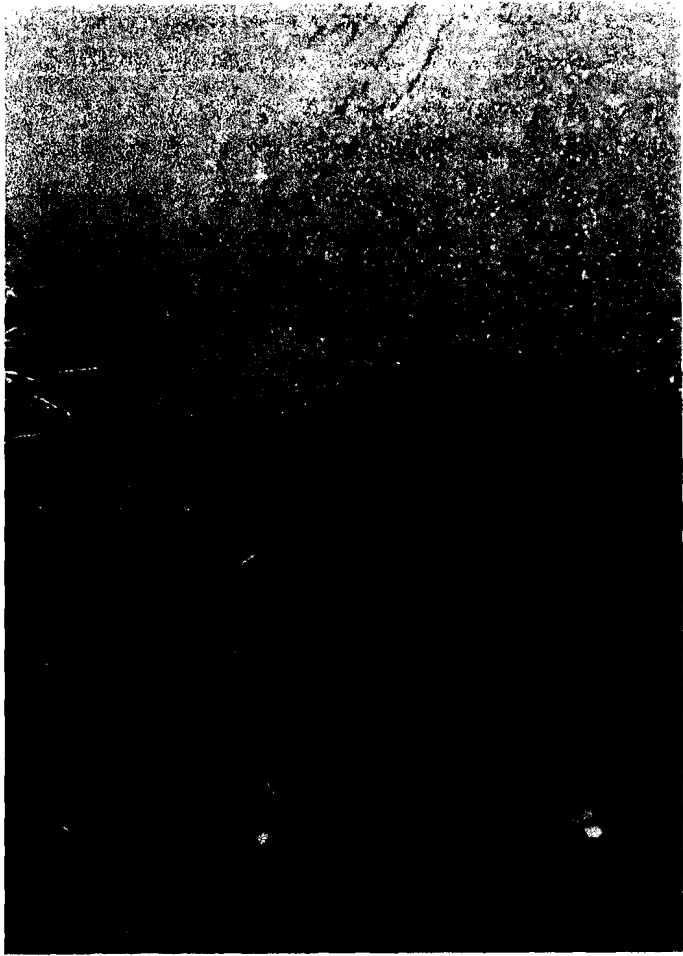
*Wanda E. García Hernández*

Wanda E. García Hernández  
Gerente Interina  
Área de Calidad de Agua

## RESPONDENTS' EXHIBIT 4







## RESPONDENTS' EXHIBIT 5

**Ing. EDUARDO OLIVER POLANCO**  
INGENIERO CIVIL  
LICENCIA 7248

CALLE BOLIVAR 406 ALTOS PDA. 24  
SANTURCE, P.R. 00912  
TELS. (787) 723-3777 / 723-4110  
FAX: (787) 722-9261

October 4, 2010

CPI Hospitality, Inc.  
P.M.B. 157  
P.O. Box. 194000  
San Juan, P.R. 00919-4000

Dear Sirs:

C.P.I. Hospitality has requested me to prepare a report on my findings regarding a complaint filed by the Environmental Protection Agency (E.P.A.) for storm water discharges in the Atlantic Ocean.

The following documents have been reviewed to prepare this Report:

1. Administrative Complaint (Complainant's Exhibit 1).
2. C.P.I.'s Answer to the Complaint (Complainant's Exhibit 3).
3. Penalty Memorandum dated September 22, 2008 (Complainant's Exhibit 4).
4. Administrative Compliance Order dated September 11, 2007 (Complainant's Exhibit 5 and 5a).
5. EPA Water Compliance Inspection Report dated August 16, 2007 (Complainant's Exhibit 6).
6. EPA Water Compliance Inspection Report dated July 10, 2008 (Complainant's Exhibit 6a).
7. Letter from Eduardo Oliver, dated August 29, 2006 (Complainant's Exhibit 7).
8. Letter from the EPA dated September 11, 2006 (Complainant's Exhibit 8).
9. EPA's NPDES NOI Application Search Results for Culebra (Complainant's Exhibit 9).
10. EPA's General NPDES Permit for Storm Water Discharges (Complainant's Exhibit 10).
11. Aerial Photograph of the Project (Complainant's Exhibit 11).
12. Aerial Photograph of the Project depicting point source (Complainant's Exhibit 12).
13. Photographs submitted by C.P.I. Hospitality.
14. Topographic Maps for Culebra Island.

This report is also based on my personal visits to the project.

From a reading of the Administrative Complaint, the EPA states that CPI discharges storm water from the project into an "unnamed creek reaching the Atlantic Ocean". A review of the topographic maps for Culebra Island reveals that there are no creeks nor rivers in the Playa Sardinias II Ward in Culebra, where the project is located. The former is confirmed from the aerial photographs submitted by the EPA (Complainant's Exhibits 11 and 12) which show that there is no creek in the Playa Sardinias Ward since the "water route" referred by the EPA is the road.

Not only are there no creeks nor rivers in the area, but also, it is physically impossible for storm water to reach the Atlantic Ocean through the "storm water flow" described by the EPA in Complainant's Exhibits 11 and 12. The road which the EPA refers as a creek is a slope that has a continuous change in upward and downward elevations. Therefore, any water that could flow through the road would be diverted to other paths once it reaches the part of the road with higher elevation.

To the former we must also add a few points. First, the project managers have informed me that they that at the lowest point of the project there is a retention pond that was created to retain any storm water that might runoff from the project. I personally checked that silty fences were situated at the project as another control measure to prevent storm water to run off from the project. Finally, it must also be considered the distance between the project and the Atlantic Ocean which is more than half a kilometer. Considering this distance it is highly unlikely that storm water carrying "pollutants", as stated by the EPA, could reach the Atlantic Ocean. Many factors contribute to this conclusion. We have already mentioned that the project managers created control measures to retain run offs. Any water that might spill beyond such control measures would necessarily carry less sediments and/or pollutants. Afterwards, such pollutants or sediments that could would remain first on the road and then absorbed by the vegetation. Therefore, if any storm water traceable to the project could indeed reach the Atlantic Ocean, it would be without any sediments and/or pollutants.

A visual inspection coordinated with representatives of the EPA is recommended to further explain the findings and conclusions included with this report.

Sincerely yours,



Eng. Eduardo Oliver





## RESPONDENTS' EXHIBIT 6

RESUME PROFESIONAL

NOMBRE: EDUARDO JOSE OLIVER POLANCO

LUGAR DE NACIMIENTO: SANTURCE, PUERTO RICO

FECHA DE NACIMIENTO: 31 DE AGOSTO DE 1952

PROFESION: INGENIERO CIVIL

LICENCIA: 7248

EDUCACION PRIMARIA Y SECUNDARIA: COLEGIO LA MERCED, HATO REY, PR.

FECHA DE GRADUACION: MAYO 1969

EDUCACION UNIVERSITARIA: BACHILLERATO DE INGENIERIA CIVIL,  
COLEGIO DE AGRICULTURA Y ARTES MECANICAS.  
UNIVERSIDAD DE PUERTO RICO, RECINTO  
DE MAYAGÜEZ

FECHA DE GRADUACION: JUNIO 1974

- OTROS CURSOS:
- 1) PLANTAS DE TRATAMIENTO (1974), JUNTA DE CALIDAD AMBIENTAL
  - 2) ANALISIS TRANSACCIONAL (1982) UNIVERSIDAD SAGRADO CORAZON
  - 3) HIPNOLOGIA (1982), INSTITUTO DE HIPNONISMO DE PUERTO RICO
  - 4) YOGA (1983), UNIVERSIDAD SAGRADO CORAZON
  - 5) EL ARTE DE HABLAR (1987), UNIVERSIDAD SAGRADO CORAZON
  - 6) RELACIONES PUBLICAS (1987), UNIVERSIDAD DE PR.
  - 7) DISEÑO AUTOCAD (1988), COLEGIO DE INGENIEROS Y AGRIMENSORES
  - 8) DISEÑO PAISAJISTA (1992), UNIVERSIDAD SAGRADO CORAZON
  - 9) ARQUITECTURA (1994), INSTITUTO DE ESTUDIOS Y CREACION
  - 10) WORDPERFECT 5.1 (1994) UNIVERSIDAD INTERAMERICANA

continúa . . . . .

EXPERIENCIA PROFESIONAL:

1. JUNIO DE 1974 A OCTUBRE 1979; GOBIERNO DE PUERTO RICO, JUNTA DE PLANIFICACION Y ADMINISTRACION DE REGLAMENTOS Y PERMISOS. REVISION Y APROBACION DE PLANOS DE CONSTRUCCION DE URBANIZACIONES.
2. NOVIEMBRE DE 1979 HASTA LA ACTUALIDAD; NEGOCIO PROPIO DE INGENIERIA PARA LA OBTENCION DE LAS APROBACIONES GUBERNAMENTALES (PERMISOS Y ENDOSOS). DISEÑO DE PLANOS DE CONSTRUCCION DE URBANIZACIONES Y DISEÑO DE PLANOS DE CONSTRUCCION DE ESTRUCTURAS (ARQUITECTURA E INGENIERIA).

OTRA PROFESION: AGRIMENSOR LICENCIADO (1988)  
COLEGIO DE INGENIEROS Y AGRIMENSORES.

continua . . . . .

PROYECTOS DISEÑADOS:

\*CONSTRUIDOS

- \* 1. REPARTO SAN RAFAEL - TRUJILLO ALTO - (33 SOLARES).
- \* 2. VILLA MARINES - CAYEY - (25 SOLARES).
- 3. VILLA POLANCO - GUAYNABO - (28 SOLARES).
- \* 4. MOJACASABE CAMPING - CABO ROJO.
- 5. EXT. JARDINES DE SAN LORENZO - (20 CASAS).
- \* 6. EXT. JARDINES DE BARCELONA - JUNCOS - (16 CASAS).
- \* 7. URB. HACIENDAS DEL DORADO - FASE II Y III - DORADO Y TOA ALTA - (134 SOLARES).
- \* 8. URB. COLINAS DE SANTA CECILIA - CABO ROJO - (52 SOLARES).
- \* 9. VILLA ISABEL - CABO ROJO - (48 SOLARES).
- \* 10. EXT. COMUNIDAD BARRIO PALMAS - ARROYO - (32 SOLARES).
- \* 11. URB. JARDINES DE CALDAS - RIO PIEDRAS - (24 SOLARES).
- \* 12. EXTENSION GUARICO - VEGA BAJA - (73 CASAS).
- \* 13. URB. PARQUE DE BUCARE - RIO PIEDRAS - (62 CASAS).
- 14. CENTRO COMERCIAL LAS MALVINAS - BAYAMON.
- \* 15. URB. REMANSOS DEL COMBATE - CABO ROJO - (88 SOLARES).
- \* 16. URB. HACIENDA CARABALI - LUQUILLO - (50 SOLARES).
- \* 17. IRMILEY CAMP RESORT - SALINAS.
- \* 18. URB. VISTA DEL CANAL - CABO ROJO - (97 SOLARES).
- \* 19. EXT. COMUNIDAD VAZQUEZ - SALINAS - (100 SOLARES).
- 20. URB. MARIA JOSE - GUAYNABO - (133 CASAS).
- \* 21. URB. MONTE VERDE - RIO PIEDRAS - (16 SOLARES).
- \* 22. URB. MONTE GRANDE - CABO ROJO - (150 SOLARES).
- \* 23. URB. VISTA BAHIA - CABO ROJO - (32 SOLARES).

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- \* 24. COND. CRISTINA DEL MAR - CABO ROJO - (30 APARTAMENTOS).
- \* 25. RESTAURANTE RODECIO DE CARABALI - LUQUILLO.
- \* 26. COND. BORINQUEN GARDENS - CABO ROJO - (44 APARTAMENTOS).
- \* 27. YAUCO PLAZA - YAUCO - (CONSULTA DE UBICACION).
- \* 28. TRIGAL PLAZA - MANATI - (CONSULTA DE UBICACION).
- \* 29. PRESTHOMES - (SEGUNDAS PLANTAS).
- \* 30. NUEVO HORIZONTE - (SEGUNDAS PLANTAS).
- 31. COND. SUANCES - CABO ROJO - (30 APARTAMENTOS).
- \* 32. URB. INDUSTRIAL HATO TEJAS - BAYAMON - 17 SOLARES.
- 33. URB. PARQUE DE LAS CEIBAS - SAN LORENZO - (154 SOLARES).
- 34. CENTRO COMERCIAL SAN LORENZO PLAZA - SAN LORENZO.
- 35. URB. ESTANCIAS DE VIANA - VEGA BAJA - (42 SOLARES).
- \* 36. URB. REMANSO TAINO - CAROLINA - (45 SOLARES).
- 37. PROYECTO BAHIA HONDA - CULEBRA - (32 VILLAS).
- \* 38. PROYECTO OASIS - TOA BAJA - (9 CASAS).
- \* 39. CENTRO COMERCIAL MARIA DEL CARMEN - COROZAL.
- \* 40. PROYECTO TURISTICO VILLA BRUSI - CAMUY - (20 CABAÑAS).
- \* 41. CEMENTERIO LOS JARDINES - ISABELA.
- 42. PARADOR CARABALI - LUQUILLO - (40 UNIDADES).
- 43. URB. RANCHO POCHO - RIO GRANDE - (38 SOLARES).
- \* 44. RIO GRANDE PLANTATION - RIO GRANDE.
- \* 45. FARMACIA MEDIANIA - LOIZA.
- \* 46. CORMADO RIVERA - GUAYNABO

- \* 49. LOTIFICACION PONS - TRUJILLO ALTO - (6 SOLARES).
- 50. FERRETERIA HERMANOS FABRE - YAUCO - (CONSULTA DE UBICACION).
- 51. URB. SANTANA - RIO PIEDRAS - (36 SOLARES).
- \* 52. URB. ESTANCIAS DEGETAU - CAGUAS - (163 SOLARES).
- \* 53. HOTEL PUERTO PALMAS - BARCELONETA - (CONSULTA DE UBICACION).
- \* 54. JUVENTUD CON UNA MISION - JUNCOS - (CONSULTA DE UBICACION).
- \* 55. EDIFICIO RUXAYELA - SANTURCE - (REMODELACION).
- \* 56. OFICINAS LIC. DOITTEAU - CABO ROJO.
- \* 57. EDIFICIO TERESINA - SANTURCE - (4 APARTAMENTOS).
- \* 58. TORRE ALMENADA - SANTURCE - (REMODELACION).
- \* 59. IGLESIA ARCA DE NOE - GUAYNABO.
- \* 60. EDIFICIO MARIOLGA - SANTURCE - (REMODELACION).
- 61. URB. CABO DEL SOL - CABO ROJO - (40 SOLARES).
- 62. URB. ALTOS DE LA VILLA - ARECIBO - (96 SOLARES).
- 63. URB. VISTA DEL RIO - RIO GRANDE - (17 SOLARES).
- \* 64. OFICINAS LIC. SANABRIA - HATO REY - (REMODELACION).
- \* 65. TIENDA DE ROPA, ROMA ELITE - HATO REY

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- \* 66. PASO FINO CARABALI - LUQUILLO - 72 SOLARES.
- \* 67. HACIENDAS DEL DORADO, FASE IV - TOA ALTA - 142 SOLARES
- \* 68. COND. OLIVER - SEGREGACION - HATO REY
- \* 69. COMERCIAL DE VALLE VERDE Y COMERCIAL VALLE VERDE - PONCE - 60 CASAS.
- 70. INDUSTRIAL PALMAS - CATAÑO - 14 LOTES.
- \* 71. RESTAURANTE - CALLE LOIZA - SANTURCE.
- \* 72. URB. VALLE HUCARES - JUANA DIAZ - 165 CASAS, (CONSULTA DE UBICACION).
- \* 73. URB. QUINTAS DE ALTAMIRA - JUANA DIAZ - 60 SOLARES, (CONSULTA DE UBICACION).
- 74. ALMACENES RIVIERA - CENTRO COMERCIAL BAYAMON OESTE.
- 75. LA TERRAZA DE NAGUABO - CENTRO COMERCIAL - NAGUABO.
- 76. CENTRO COMERCIAL JUNCOS PLAZA.
- 77. URB. CEIBA REAL - JUNCOS - 100 CASAS, (CONSULTA DE UBICACION).
- \* 78. URB. HACIENDAS DEL CEDRO EN NARANJITO, (18 SOLARES).
- \* 79. OFICINAS DR. JOSE DISLA PEÑA - SANTURCE.
- 80. ACCESO ESTACIONAMIENTO DEL HOTEL SAN JUAN.
- \* 81. TALLER DE COSTURA BURGUERA - HATO REY.
- \* 82. TALLER DE HOJALATERIA - CAGUAS.
- 83. RIO PLATA FAST FOOD COURT - DORADO, (CONSULTA DE UBICACION).
- \* 84. REMODELACION DE APARTAMENTOS MARI-JANA - SANTURCE.
- 85. CENTRO COMERCIAL OLIMPIA - YAUCO, (CONSULTA DE UBICACION).
- 86. COMERCIAL CEDEÑO - BAYAMON.
- \* 87. CASAS ELEGANTES (SEGUNDAS PLANTAS).
- \* 88. AVANTI HOMES (SEGUNDAS PLANTAS).

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- \* 89. COQUI HOMES (SEGUNDAS PLANTAS).
- \* 90. CASAS BONITAS (SEGUNDAS PLANTAS).
- \* 91. TOWER HOMES (SEGUNDAS PLANTAS).
- 92. GASOLINERA MONACO - MANATI.
- 93. COND. DANZA DEL SOL - CABO ROJO - 48 APARTAMENTOS, (CONSULTA DE UBICACION).
- 94. HOTEL PLAZA DE HOSTOS - MAYAGUEZ - 60 UNIDADES, (CONSULTA DE UBICACION).
- \* 95. VILLAS DEL ROSARIO - SAN GERMAN - 40 CASAS, (CONSULTA DE UBICACION).
- \* 96. REMODELACION EQUITY MORTGAGE - SANTURCE.
- \* 97. CONTROL DE ACCESO - URB. BORINQUEN GARDENS - RIO PIEDRAS.
- \* 98. COMERCIO ZONA DE NIÑOS - LOIZA.
- 99. CONTROL DE ACCESO - COND. WINDSOR TOWER - RIO PIEDRAS.
- \* 100. FARMACIA WALGREENS - VIEJO SAN JUAN.
- \* 101. VILLAS DE ALBAEDEN - CABO ROJO - 10 APARTAMENTOS.
- \* 102. RESIDENCIA HOTEL, CHARLIE GARCIA - AGUAS BUENAS.
- 103. RESIDENCIA, EDUARDO REYES - DORADO.
- 104. 2DA. PLANTA - EDIFICIO FLYING SAUCER - ISLA VERDE.
- \* 105. PERSPECTIVA DE LA PISTA DE CAROLINA.
- 106. ALMACEN KELLY SPRINGFIELD - AMPLIACION - BAYAMON.
- \* 107. CLINICA PARA CABALLOS - ESTERIO ENRIQUE HERRERA - SANTA