

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 Broadway  
New York, New York 10007

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG.11  
2011 NOV -7 P 3:30  
REGIONAL HEARING  
CLERK

<p>In the matter of</p> <p><b>Oil Energy System, Inc.</b> P. O. Box 711 Mayagüez, Puerto Rico 00681</p> <p><b>Respondent.</b></p> <p>Proceeding under Section 3008 of the Solid Waste Disposal Act, as amended, 42 USC §6928</p>	<p>Complaint, Compliance Order, and Notice of Opportunity for Hearing</p> <p>Docket No. RCRA-02-2011-7107</p>
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**REQUEST FOR HEARING AND ANSWER TO 'COMPLAINT, COMPLIANCE ORDER,  
AND NOTICE OF OPPORTUNITY FOR HEARING'**

**TO THE ENVIRONMENTAL PROTECTION AGENCY:**

**COMES NOW** Respondent Oil Energy System, Inc., hereinafter "Respondent" through the undersigned attorney, and very respectfully requests a hearing and submits its Answer to the Complaint, Compliance Order, and Notice of Opportunity for Hearing, (hereinafter, "Complaint") as follows:

**I. Introduction**

1. Paragraph 1 of Section I of the Complaint consists of statements and/or conclusions as to matters of law and, as such,

does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

2. Paragraph 2 of Section I of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied. Respondent does admit that it only has received from Complainant copy of 40 CFR § 279 Subpart F. As to the rest of the allegations contained in said paragraph regarding Oil Energy System's operations, Respondent specifically denies that it has violated in whole or in part the Solid Waste Disposal Act, as amended, 42 U.S.C. § 6901 *et seq*, or any other federal regulations concerning the management of hazardous waste at its facility.

3. Paragraph 3 of Section I of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

4. Paragraph 4 of Section I of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

## **II. Jurisdiction and General Provisions**

5. Paragraph 5 of Section II of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

6. Paragraph 6 of Section II of the Complaint consists of statements and/or conclusions as to matters of fact not known to the Respondent so it is denied for lack of information or knowledge sufficient to form a belief as to its truth.

7. Paragraph 7 of Section II of the Complaint is admitted.

8. Paragraph 8 of Section II of the Complaint is admitted. However, Respondent hereby clarifies that its facilities are strictly owned by sister company, Petro West, Inc. (hereinafter "Sister Company").

9. Paragraph 9 of Section II of the Complaint is admitted.

10. Paragraph 10 of Section II of the Complaint is admitted.

11. Paragraph 11 of Section II of the Complaint is denied.

## **III. Definitions and Statutory Provisions**

12. Paragraph 12 of Section III of the Complaint consists of statements and/or conclusions as to matters of law and as

such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

13. Paragraph 13 of Section III of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

14. Paragraph 14 of Section III of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

15. Paragraph 15 of Section III of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, Respondent hereby admits that Sister Company owns and mainly controls the premises used by Respondent in the normal course of its operations.

16. Paragraph 16 of Section III of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, Respondent hereby admits that Sister Company owns and mainly controls the premises used by Respondent in the normal course of its operations.

17. Paragraph 17 of Section III of the Complaint is admitted.

18. Paragraph 18 of Section III of the Complaint is admitted regarding the allegation that Respondent operates as a used oil transporter. As for the rest of the allegation, it consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

#### **IV. Findings**

19. Paragraph 19 of Section IV of the Complaint is admitted regarding the allegation that representatives of the EPA conducted an inspection of Respondent's facilities on or about February 2, 2010. As for the rest of the allegation, it is denied since Respondent has not received a formal and express verbal or written confirmation on the purposes of such visit.

20. Paragraph 20 of Section IV of the Complaint is admitted regarding the allegation that representatives of the EPA conducted an inspection of Respondent's facilities on or about March 2, 2011. As for the rest of the allegation, it is denied since Respondent has not received a formal and express verbal or written confirmation on the purposes of such visit.

21. Paragraph 21 of Section IV of the Complaint is admitted regarding the allegation that representatives of the

EPA held a meeting with Respondent's representatives on or about March 2, 2011. As for the rest of the allegation, including the hue given to such meeting as a "closing conference", it is denied since Respondent has not received a formal and express verbal or written confirmation on the purposes of such visit. However, EPA representatives did required Respondent to provide 40 CFR §279 Subpart F evidence of compliance.

22. Paragraph 22 of Section IV of the Complaint is admitted regarding the allegation that representatives of the EPA held a meeting with Respondent's representatives on or about March 2, 2011. As for the rest of the allegation it is denied since Respondent has not received a formal and express verbal or written confirmation on the purposes of such visit or the possibility of any penalty that could be imposed. However, EPA representatives did required Respondent to provide 40 CFR §279 Subpart F evidence of compliance.

It is hereby admitted that communication between the meeting's participants was not the desired by both parts because Respondent's representatives, thinking that the way the matter was being handled by an employee of the EPA was not appropriate, objected to that procedure and called off the meeting and the visit to the facilities. Nonetheless, an apology was addressed

to that specific EPA representative with the idea to make way for an open dialogue for the benefit of all parties involved.

As for the evidence submittal, it was recently produced and, according to our best interpretation, Respondent is in compliance with 40 CFR §279 Subpart F since 2005.

23. Paragraph 23 of Section IV of the Complaint is admitted. However, on September 16, 2011 Respondent submitted all the pertinent evidence. According to Respondent's records, it has been in compliance with regulations contained in 40 CFR § 279 Subpart F since 2005. The details of this compliance are as follows:

a) EPA Identification Number:

The initial EPA ID Number for the facility was submitted in 1998 (EPAID PRR000008524). Recently, this EPA ID number was amended to provide updated information of the facility. (See enclosure 1, pages 1-7 of appendix)

b) Internal Communication System:

40 CFR § 279.52 Subpart F requires the processor facilities to be equipped with certain equipment as part of its preparedness and prevention efforts. Specifically, in subpart (i), the regulation requires "An internal communication system or alarm system capable of providing immediate instructions (voice or signal) to the facility personnel".

Respondent's facility has always had an internal communication system consisting of:

- Processing of used oil will always require the presence of two persons at the Respondent's facility, so one can react for the other at an emergency situation.
- Although both Respondent's employees would be watching for each other, they both carry cellular phones with them so they can communicate among themselves, other fellow workers or emergency team members.
- They also have access to a line phone located at the loading rack shop area, capable of communicating to other locations within the Respondent's facility and to the emergency response team members, if necessary.
- A list of emergency phone numbers is readily available at the Respondent's line phone station.

Also, in an effort to improve Respondent's preparedness and prevention efforts, its' internal communication system was upgraded by adding an alarm system with several activation stations at different locations throughout the facility and with visual and audible enunciators. Respondent's personnel have been trained to use the alarm system as an additional tool in the emergency prevention efforts. (See enclosure 2, p. 8-9)

c) Arrangement with Local Authorities:

In 2005, letters were sent out to the local police department, fire department, hospitals in the Mayaguez, Puerto Rico, area and the local Agencia Estatal para el Manejo de Emergencias y Administración de Desastres (AEMED). Respondent hereby enclose copies of such although we could not find the one for the AEMED but which was in fact sent by Mr. Raymond Huddleston, Respondent's environmental consultant since 2005. Mr. Huddleston is available to provide a sworn statement regarding that particular matter if requested by the EPA. (See enclosure 3 with letters form 2005 and 2011 with the MSDS, p. 10-30)

d) Fire Extinguishing Equipment:

Due to the nature of the Respondent's facilities sister company, the facility has ample capabilities for firefighting equipment. Local contractors are regularly inspecting the equipment as well as by other regulatory agencies with jurisdiction over these and other matters.

e) Testing & Maintenance of Equipment:

All Respondent's facility communications, alarm, response equipment and response capabilities are inspected and tested on a quarterly basis and documented. These procedures take place in compliance with Title 33 CFR part 154 and under the jurisdiction of the U.S. Coast Guard. The drill and exercises procedures and

the drill and exercises performed to meet Coast Guard's standards go beyond the requirements of testing and maintenance described in Title 40 CFR part 279. (See evidence of drills & exercises in enclosure 4, p. 31-70)

f) Contingency Plan & Emergency Procedures:

A Respondent's facility contingency plan was developed on 2005 and in accordance with the requirements of 40 CFR §279(b)(2) [See enclosure 5, p. 71-98], copies of which were submitted to the local Police and Fire Departments as well as to AEMED. In addition, the Respondent's facility had a more comprehensive Facility Response Plan under 33 CFR part 154.

g) Analysis Plan:

In an effort to comply with §279.55, Respondent has always had an operational procedure regarding on site and off site sampling and testing since it was originally organized to become a used oil collector/transporter. Back in 2005, an analysis plan was formalized. The purpose of such plan was to ensure any used oil to be collected was first tested off-site to ensure that it was, in fact, what the generator said it was and within the halogen parameters. (See enclosure 6, p. 99-102)

- The operational procedure was written and made part of Respondent's operational procedures manual as it was

organized. The procedure calls for the Respondent's truck drivers to inspect the used oil prior to collection and to perform an off-site test to the oil in an effort to determine if the oil is not contaminated.

- The operational procedure states that only non contaminated oil is to be collected, transported and processed by Respondent.
- Respondent's truck drivers use the "Manifiesto de Transportacion de Aceite Usado" as the document where the amount of non-contaminated oil is registered, prior to collection and transportation.
- Recently, Respondent added another document to their operational procedure, where the truck drivers write down the amount of non-contaminated oil to be collected and transported, in addition to the manifest.

As part of the Analysis Plan, Respondent has always performed on-site testing for the oil stored at its facilities. Random samples are collected from the used oil storage tanks and sent out to independent laboratories. An example of such laboratory analysis is included in enclosure 6 (p. 99-102) as reference along with a copy of the biennial report. (see enclosure 6, p. 102)

h) Tracking:

All Respondent's pickups and shipments of used oil have been documented in the used oil manifest format required by local state agencies. This manifest includes important information on the used oil generators as well as on the collector, transporter and processor. All the information required by §279.56 is included and filled out in the "Manifiesto de Transportacion de Aceite Usado". (Enclosure 7, p. 103-109) These manifests are available at the offices of the facility and are extensive; nevertheless they are available for inspection by the EPA.

24. Paragraph 24 of Section IV of the Complaint consists of statements and/or conclusions as to matters of law or complaint writing techniques and as such does not require a responsive pleading. However, inasmuch as a response is required, paragraphs "7" through "24", Respondent re-alleges each allegation and/or affirmative defense hereby contained in such paragraphs.

25. Paragraph 25 of Section IV of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

26. Paragraph 26 of Section IV of the Complaint consists of statements and/or conclusions as to matters of law and as such

does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

27. Paragraph 27 of Section IV of the Complaint is hereby denied. No such tank exists.

28. Paragraph 28 of Section IV of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

29. Paragraph 29 of Section IV of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, inasmuch as a response is required, it is denied.

30. Paragraph 30 of Section IV of the Complaint consists of statements and/or conclusions as to matters of law and as such does not require a responsive pleading. However, Respondent hereby admits that it has been in compliance since 2005 with 40 CFR §279 Subpart F.

31. Paragraph 31 of Section IV of the Complaint is hereby admitted. Respondent always had such documentation and the Biennial Report was recently submitted to the EPA.

32. Paragraph 32 of Section IV of the Complaint is hereby denied. Respondent has always been in compliance with RCRA since 2005.

**V. Proposed Civil Penalty**

33. All Paragraphs set forth in Section V of the Complaint does not require a responsive pleading from Respondent. However, inasmuch as it is required, it is denied.

**VI. Compliance Order**

34. All Paragraphs set forth in Section VI of the Complaint does not require a responsive pleading from Respondent. However, inasmuch as it is required, it is denied. Also, as to the factual part of said paragraphs, Respondent hereby denies that it is processing oil at its facilities and alleges that it has complied with 40 CFR §279 Subpart F requirements and all other related regulations since 2005.

**VII. Notice of Liability for Additional Civil Penalties**

35. The Paragraph set forth in Section VII of the Complaint does not require a responsive pleading from Respondent. However, inasmuch as it is required, it is denied.

**VIII. Procedures Governing this Administrative Litigation**

36. The Paragraphs set forth in Section VIII of the Complaint does not require a responsive pleading from Respondent. However, inasmuch as it is required, it is denied, and Respondent specifically and affirmatively requests a Hearing upon the issues raised by the Complaint and the present Answer to the Complaint.

**IX. Informal Settlement Conference**

37. The Paragraphs set forth in Section IX of the Complaint does not require a responsive pleading from Respondent. However, Respondent specifically alleges that it requested and it was granted a first meeting regarding the informal settlement conference. It was held on August 31, 2011 in San Juan, Puerto Rico.

**X. Resolution of this Proceeding without Hearing or Conference**

38. The Paragraph set forth in Section X of the Complaint does not require a responsive pleading from Respondent. However, as stated in Paragraph 36 of the present Answer, we hereby request a Hearing upon the issues raised by the Complaint and the present Answer to the Complaint.

**XI. Filing of Documents**

39. The Paragraphs set forth in Section XI of the Complaint do not require a responsive pleading from Respondent.

**XII. Affirmative Defenses**

40. Respondent has complied with 40 CFR §279 Subpart F requirements and all other related regulations since 2005.

41. The allegations against Respondent, as alleged in the Complaint, fail to state a claim upon which relief can be granted.

42. The Complaint fails to state liability on Respondent that is cognizable under any federal law or regulation as for the facts alleged in the Complaint.

43. The allegations against Respondent, as alleged in the Complaint, do not amount to any violation of any kind of 40 CFR §279 Subpart F requirements or all other related regulations.

44. The imposition of the proposed civil penalties cannot stand given that there is no nexus or causation between Respondent's acts and/or omissions and the violations alleged in the Complaint.

45. Respondent was and is not involved in the alleged violations of law and regulations mentioned or cited on the Complaint.

46. Respondent acted, at all times, in good faith, according to law.

47. Respondent reserves its right to amend the pleadings and to raise any other affirmative defenses that arise as a result of the discovery taken herein or upon good cause shown.

**WHEREFORE**, Respondent respectfully prays that the Complaint be dismissed and that no civil penalties be imposed.

**IT IS HEREBY CERTIFIED** that on this same date a true and exact copy of this document was sent via certified mail to: Lourdes del Carmen Rodríguez, Esq., Assistant Regional Counsel, U.S.

Environmental Protection Agency, Region 2, Centro Europa Building, suite 417, 1492 Ponce de León Avenue, San Juan, Puerto Rico 00907. Ms. María V. Rodríguez, Director, Land Pollution Regulation Program, Puerto Rico Environmental Quality Board, PO Box 11488, Santurce, Puerto Rico 00910. For filing purposes, the Original and One (1) Copy of this document has been sent via certified mail to: Regional Hearing Clerk, U.S. Environmental Protection Agency, Region 2, 290 Broadway- 16<sup>th</sup> Floor - Room 1631, New York, New York 10007-1866.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this 31<sup>st</sup> day of October 2011.



**JOSÉ JAVIER LUGO TORO, ESQ.**

Counsel to Respondent

PMB 171

400 Calaf Street

San Juan, Puerto Rico 00918

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ENCLOSURE 4

**FACILITY RESPONSE PLAN****2****QI NOTIFICATION & TABLE TOP (Quarterly)**

Facility: Petrowest, Inc.

Date: 11/12/07

Address: Carretera 341, Mayaguez, P.R. 00681

Start: 1000

End: 1130

Location: Mayaguez

Drill PIC: Raymond B. Huddleston

Facility  
PIC: Mr. Jose GonzalezRegulatory Compliance  
787-869-7796

Applicability: Spill management team and qualified individual

Frequency: Quarterly

Initiating Authority: Facility policy, Hired advisor, U.S. Coast Guard, EPA

Participating Elements: Facility personnel and qualified individuals

Scope: Table top scenario, exercise communications between facility personnel, qualified individuals and command &amp; control personnel if different, exercise knowledge of the facility response plan.

Objectives: Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

Certification: To be performed by Regulatory Compliance 787-869-7796

Verification: U.S. Coast Guard, EPA

Records: This one form, equipment records and any attachment described herein.

Retention Period: 3 Years minimum

**Scenario:**

Facility discharged 10,000 gallons of diesel fuel into Bahia de Mayaguez. Winds are from the East at 25 knots, tide is flooding. Discharge occurred at facility storage tanks while loading for a transfer. All oil accessed the water via the storm drain at the entrance of the facility.

**Lessons Learned:****Certification:**

I certify under penalty of law that this document and the procedures performed were prepared and carried out under my direction and/or supervision in accordance with a system designed to assure that the procedures, drills and exercises were performed. Based on my personal observation the information contained is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Raymond Huddleston

Name

Signature

**FACILITY RESPONSE PLAN**

**2**

**QI NOTIFICATION (Quarterly)**

**Facility:** Petrowest, Inc.

**Date:** 8/21/07

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0820      **End:** 0930

**Location:** Mayaguez

**Drill PIC:** Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

**Facility PIC:** Mr. Jose Sanchez

**Applicability:** Spill management team and qualified individual

**Frequency:** Quarterly

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Facility personnel and qualified individuals

**Scope:** Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if diferent, exercise knowledge of the facility response plan.

**Objectives:** Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

10,000 gallon spill of used oil from a Coast Guard Cutter at the mayaguez pier. Winds are from the east at 5 MPH. Tide is flooding. DR Ferry is in port.

**Evaluation:**

Name	ATTENDEES	Signature
Raymond Valentin Cordero		Raymond Valentin Cordero
Javier Morales Rodriguez		Javier Morales Rodriguez
Daniel Martinez Mungueta		Daniel Martinez Mungueta
EDWIN MARTINEZ Emizarry		Edwin Martinez Emizarry
Oscar Troche Ortiz		Oscar Troche Ortiz

# FACILITY RESPONSE PLAN

3

## TABLE TOP (Yearly)

**Facility:** Petrowest, Inc.

**Date:** 8/21/07

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0820      **End:** 0930

**Location:** Mayaguez

**Excercise PIC:** Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

**Facility PIC:** Mr. Jose Sanchez

**Applicability:** Spill management team and qualified individuals

**Frequency:** Annualy

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Spill management team and qualified individuals

**Scope:** Table top scenario, excercise the spill management team organization, communications and decision making in managing a spill response. All 3 types of discharge will be addressed.

**Objectives:** Ascetain spill management team and QI knowledge in: Knowledge of the FRP, proper notification, communications system, ability to access OSRO, coordination with internal personnel for spill response, NRC notification, ESI information comprehension.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

10,000 gallon spill of used oil from a Coast Guard Cutter at the mayaguez pier. Winds are from the east at 5 MPH. Tide is flooding. DR Ferry is in port.

**Evaluation:**

Name	ATTENDEES	Signature
Raymond Valentin Cinglearo		Raymond Valentin Cinglearo
Javier Morales Rodriguez		Javier Morales
Daniel Martinez Minguella		Daniel Martinez Minguella
EDUARDO MARTINEZ DEL CARMY		Edo. Mart
Oscar Troche Ortiz		Oscar Troche Ortiz

# FACILITY RESPONSE PLAN

4

## UNANNOUNCED EQUIPMENT DEPLOYMENT (Yearly)

**Facility:** Petrowest, Inc.

**Date:** 8/21/07

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0820      **End:** 0930

**Location:** Mayaguez

**Excercise PIC:** Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

**Facility PIC:** Mr. Jose Sanchez

**Applicability:** All hands

**Frequency:** Annualy

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard

**Participating Elements:** All hands

**Scope:** Unannounced activation of personnel with responsibility under the plan, deploy mayor equipment and an explanation provided of the procedures. A practice of the spill mitigation procedures will be explained.

**Objectives:** Demonstate ability of the facility personnel to responde, deploy, and operate facility response equipment and evaluate the effectiveness of the response.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

10,000 gallon spill of used oil from a Coast Guard Cutter at the mayaguez pier. Winds are from the east at 5 MPH. Tide is flooding. DR Ferry is in port.

**Evaluation:**

Name	ATTENDEES	Signature
Raymond Valentin Cordero		Raymond Valentin Cordero
Javier Morales Rodriguez		Javier Morales Rodriguez
Daniel Martinez Minguela		Daniel Martinez Minguela
EDWIN MARRAZO Izquierdo		Edwin Marrazo Izquierdo
Oscar Troche Ortiz		Oscar Troche Ortiz

# Regulatory Compliance



**PRODUCT: FRPCG**

**PURPOSE: DRILLS & EXERCISES**

**ENTITY: Petrowest, Inc.**

**DATE: March 30, 2007**

**FOR: 1st QTR 2007**

The present document contains information researched, and developed by Regulatory Compliance (RCI). The information is intended for the use of the individual or entity named above. You are hereby notified that any disclosures, copying, distribution or the taking of any action in reliance on the contents of this information, is strictly prohibited, and action will be enforced under the laws of the Commonwealth of Puerto Rico, unless previous written authorization has been given by RCI.

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# FACILITY RESPONSE PLAN

3

## TABLE TOP (Yearly)

**Facility:** Petrowest, Inc. **Date:** March 30, 2007  
**Address:** Carretera 341. Mayaguez, P.R, 00681 **Start:** 80000 **End:** 0930  
**Location:** Mayaguez **Excercise PIC:** Raymond B. Huddleston  
**Facility PIC:** Mr. Jose Sanchez **Regulatory Compliance**  
**787-869-7796**

**Applicability:** Spill management team and qualified individuals

**Frequency:** Annualy

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Spill management team and qualified individuals

**Scope:** Table top scenario, excercise the spill management team organization, communications and decision making in managing a spill response. All 3 types of discharge will be addressed.

**Objectives:** Ascetain spill management team and QI knowledge in: Knowledge of the FRP, proper notification, communications system, ability to access OSRO, coordination with internal personnel for spill response, NRC notification, ESI information comprehension.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

10,000 gallon spill of used oil from a Coast Guard Cutter at the mayaguez pier. Winds are from the east at 5 MPH. Tide is flooding. DR Ferry is in port.

**Evaluation:**

Name	ATTENDEES	Signature
Reggie Borrero Martinez		<i>[Signature]</i>
Daniel Martinez Munguia		<i>[Signature]</i>
JANIER NOVALES RODRIGUEZ		<i>[Signature]</i>
EDUARDO MARTINEZ RODRIGUEZ		<i>[Signature]</i>
Sahyd Valentin Cardenas		<i>[Signature]</i>

<b>FACILITY RESPONSE PLAN</b>	<b>2</b>
<b>QI NOTIFICATION (Quarterly)</b>	

**Facility:** Petrowest, Inc. **Date:** March 30, 2007  
**Address:** Carretera 341, Mayaguez, P.R, 00681 **Start:** 8000000 **End:** 0930  
**Location:** Mayaguez **Drill PIC:** Raymond B. Huddleston  
**Facility PIC:** Mr. Jose Sanchez **Regulatory Compliance**  
787-869-7796  
**Applicability:** Spill management team and qualified individual  
**Frequency:** Quarterly  
**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA  
**Participating Elements:** Facility personnel and qualified individuals  
**Scope:** Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if different, exercise knowledge of the facility response plan.

**Objectives:** Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any attachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**  
 10,000 gallon spill of used oil from a Coast Guard Cutter at the mayaguez pier. Winds are from the east at 5 MPH. Tide is flooding. DR Ferry is in port.

**Evaluation:**

Name	ATTENDEES	Signature
Reggie Borrero Martinez		<i>[Signature]</i>
Daniel Martinez Minguela		<i>[Signature]</i>
JAVIER Morales Rodriguez		<i>[Signature]</i>
Edwin Morales Serrano		<i>[Signature]</i>
Sahyd Valentin Cardona		<i>[Signature]</i>

<b>FACILITY RESPONSE PLAN</b>	<b>2</b>
<b>QI NOTIFICATION (Quarterly)</b>	

**Facility:** Petrowest, Inc.

**Date:** 2/22/08

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0700      **End:** 0830

**Location:** Mayaguez

**Drill PIC:** Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

**Facility PIC:** Mr. Jose Sanchez

**Applicability:** Spill management team and qualified individual

**Frequency:** Quarterly

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Facility personnel and qualified individuals

**Scope:** Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if different, exercise knowledge of the facility response plan.

**Objectives:** Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any attachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

Worst case discharge scenario of a spill of 10,000 gallons of diesel fuel while refueling one of the Coast Guard cutters. Cutter had left open vent and all oil spilled into the water. Coast Guard is not cooperative so facility must attend entire drill by themselves. Coast Guard is demanding containment boom removed so they can get underway.

**Evaluation:**

Name	ATTENDEES	Signature
Daniel Martinez Minguela		<i>Daniel Martinez Minguela</i>
JAVIER NOVALES Rodriguez		<i>Javier Novales Rodriguez</i>
EDUARD MARCHESI IRIZARRY		<i>Edu Marchesi</i>
Oscar Troche Ortiz		<i>Oscar Troche Ortiz</i>

# FACILITY RESPONSE PLAN

3

## TABLE TOP (Yearly)

**Facility:** Petrowest, Inc.

**Date:** 2/22/08

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0700 **End:** 0830

**Location:** Mayaguez

**Excercise PIC:** Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

**Facility PIC:** Mr. Jose Sanchez

**Applicability:** Spill management team and qualified individuals

**Frequency:** Annualy

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Spill management team and qualified individuals

**Scope:** Table top scenario, excercise the spill management team organization, communications and decision making in managing a spill response. All 3 types of discharge will be addressed.

**Objectives:** Ascetain spill management team and QI knowledge in: Knowledge of the FRP, proper notification, communications system, ability to access OSRO, coordination with internal personnel for spill response, NRC notification, ESI information comprehension.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

### Scenario:

Worst case discharge scenario of a spill of 10,000 gallons of diesel fuel while refueling one of the Coast Guard cutters. Cutter had left open vent and all oil spilled into the water. Coast Guard is not cooperative so facility must attend entire drill by themselves. Coast Guard is demanding containment boom removed so they can get underway.

### Evaluation:

Name	ATTENDEES	Signature
Daniel Martinez Minguela		Daniel Martinez Minguela
JAVIER Morales Rodriguez		Javier Morales Rodriguez
Eduin Martinez Suarez		Eduin Martinez Suarez
Oscar Troche Ortiz		Oscar Troche Ortiz

# FACILITY RESPONSE PLAN

4

## UNANNOUNCED EQUIPMENT DEPLOYMENT (Yearly)

**Facility:** Petrowest, Inc. **Date:** 2/22/08  
**Address:** Carretera 341, Mayaguez, P.R, 00681 **Start:** 0700 **End:** 0830  
**Location:** Mayaguez **Exercise PIC:** Raymond B. Huddleston  
**Facility PIC:** Mr. Jose Sanchez **Regulatory Compliance**  
**787-869-7796**

**Applicability:** All hands

**Frequency:** Annually

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard

**Participating Elements:** All hands

**Scope:** Unannounced activation of personnel with responsibility under the plan, deploy major equipment and an explanation provided of the procedures. A practice of the spill mitigation procedures will be explained.

**Objectives:** Demonstrate ability of the facility personnel to respond, deploy, and operate facility response equipment and evaluate the effectiveness of the response.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any attachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

Worst case discharge scenario of a spill of 10,000 gallons of diesel fuel while refueling one of the Coast Guard cutters. Cutter had left open vent and all oil spilled into the water. Coast Guard is not cooperative so facility must attend entire drill by themselves. Coast Guard is demanding containment boom removed so they can get underway.

**Evaluation:**

Name	ATTENDEES	Signature
Daniel Martinez Mingula		<i>Daniel Martinez Mingula</i>
JAVIER NOVALES RODRIGUEZ		<i>Javier Novales Rodriguez</i>
Edwin Martinez Izarray		<i>Edwin Martinez Izarray</i>
Oscar Troche Ortiz		<i>Oscar Troche Ortiz</i>

# FACILITY RESPONSE PLAN

5

## UNANNOUNCED EQUIPMENT DEPLOYMENT (Yearly)

**Facility:** Petrowest, Inc. **Date:** May 2, 2008  
**Address:** Carretera 341, Mayaguez, P.R, 00681 **Start:** 0730 **End:** 0800  
**Location:** Mayaguez **Excercise PIC:** Raymond B. Huddleston  
**Facility PIC:** Mr. Jose Gonzalez **Regulatory Compliance**  
**787-869-7796**

**Applicability:** All hands

**Frequency:** Annually

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard

**Participating Elements:** All hands

**Scope:** Unannounced activation of personnel with responsibility under the plan, deploy mayor equipment and an explanation provided of the procedures. A practice of the spill mitigation procedures will be explained.

**Objectives:** Demonstate ability of the facility personnel to responde, deploy, and operate facility response equipment and evaluate the effectiveness of the response.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

Facility was performing transfer operations at their onshore facility when one of the storage tanks of used oil ruptured and the spill reached the stormdrain at the entrance to the facility. Approximately 5,000 gallons of product was discharged and aproximatedlt 1,000 of them went into the stormdrain. Tide is ebbing.

**Evaluation:**

Name	ATTENDEES	Signature
Raymond Valentin Cruz		Raymond Valentin Cruz
Miguel Rodriguez		[Signature]
Savie Morales Rodriguez		[Signature]
Humberto Torres Otero		[Signature]
Edwin Martinez Ferrer		[Signature]
Angel Luis Perez Pardo		[Signature]
Daniel Martinez Munucla		Daniel Martinez Munucla

**FACILITY RESPONSE PLAN**

**2**

**QI NOTIFICATION (Quarterly)**

**Facility:** Petrowest, Inc.

**Date:** May 2, 2008

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0730

**End:** 0800

**Location:** Mayaguez

**Drill PIC:** Raymond B. Huddleston

**Facility PIC:** Mr. Jose Gonzalez

**Regulatory Compliance**  
787-869-7796

**Applicability:** Spill management team and qualified individual

**Frequency:** Quarterly

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Facility personnel and qualified individuals

**Scope:** Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if different, exercise knowledge of the facility response plan.

**Objectives:** Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any attachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

Facility was performing transfer operations at their onshore facility when one of the storage tanks of used oil ruptured and the spill reached the stormdrain at the entrance to the facility. Approximately 5,000 gallons of product was discharged and approximatedlt 1,000 of them went into the stormdrain. Tide is ebbing.

**Evaluation:**

Name	ATTENDEES	Signature
Raymond Valentin Compliance		Raymond Valentin Compliance
MARCO RODRIGUEZ		MARCO RODRIGUEZ
Javier R. Morales Rodriguez		Javier R. Morales Rodriguez
Lombardo Torres Otero		Lombardo Torres Otero
EDWIN MARTINEZ SAIZANO		EDWIN MARTINEZ SAIZANO
Angel Luis Perez Rojas		Angel Luis Perez Rojas
Antel Martinez Minguela		Antel Martinez Minguela

# FACILITY RESPONSE PLAN

3

## TABLE TOP (Yearly)

**Facility:** Petrowest, Inc. **Date:** May 2, 2008  
**Address:** Carretera 341, Mayaguez, P.R, 00681 **Start:** 0730 **End:** 0800  
**Location:** Mayaguez **Excercise PIC:** Raymond B. Huddleston  
**Facility PIC:** Mr. Jose Gonzalez **Regulatory Compliance**  
**787-869-7796**

**Applicability:** Spill management team and qualified individuals

**Frequency:** Annualy

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Spill management team and qualified individuals

**Scope:** Table top scenario, excercise the spill management team organization, communications and decision making in managing a spill response. All 3 types of discharge will be addressed.

**Objectives:** Ascetain spill management team and QI knowledge in: Knowledge of the FRP, proper notification, communications system, ability to access OSRO, coordination with internal personnel for spill response, NRC notification, ESI information comprehension.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

Facility was performing transfer operations at their onshore facility when one of the storage tanks of used oil ruptured and the spill reached the stormdrain at the entrance to the facility. Approximately 5,000 gallons of product was discharged and aproximatedlt 1,000 of them went into the stormdrain. Tide is ebbing.

**Evaluation:**

Name	ATTENDEES	Signature
Raymond Valentin Cruz		Raymond Valentin Cruz
Manuel Rodriguez		[Signature]
JAYIER Morales Rodriguez		Javier Morales
Humberto Torres Otero		[Signature]
Edwin Martinez Escobar		[Signature]
Angel Luis Perez Pizar		[Signature]
Daniel Martinez Alguade		Daniel Martinez Alguade

**FACILITY RESPONSE PLAN**

2

**QI NOTIFICATION & TABLE TOP (Quarterly)**

Facility: Petrowest, Inc.

Date: 12/20/10

Address: Carretera 341, Mayaguez, P.R. 00681

Start: 0930 End: 1030

Location: Mayaguez

Drill PIC: Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

Facility PIC: Mr. Jose Gonzalez

Applicability: Spill management team and qualified individual

Frequency: Quarterly

Initiating Authority: Facility policy, Hired advisor, U.S. Coast Guard, EPA

Participating Elements: Facility personnel and qualified individuals

Scope: Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if different, exercise knowledge of the facility response plan.

Objectives: Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

Certification: To be performed by Regulatory Compliance 787-869-7796

Verification: U.S. Coast Guard, EPA

Records: This one form, equipment records and any attachment described herein.

Retention Period: 3 Years minimum

Scenario:

*Discussed hose requirements and inspection procedures for the same. Rehearsed emergency shutdown procedures.*

Lessons Learned and Outcome:

*were some doubt about the length of the hoses.*

Certification:

I certify under penalty of law that this document and the procedures performed were prepared and carried out under my direction and/or supervision in accordance with a system designed to assure that the procedures, drills and exercises were performed. Based on my personal observation the information contained is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Raymond Huddleston

Name

Signature

**FACILITY RESPONSE PLAN**

**4**

**UNANNOUNCED EQUIPMENT DEPLOYMENT (Semi-Annual)**

Facility: Petrowest, Inc.

Date: *April 20, 2010*

Address: Carretera 341, Mayaguez, P.R, 00681

Start: *0830* End: *1045*

Location: Mayaguez

Excercise PIC: **Raymond B. Huddleston**  
Regulatory Compliance  
787-869-7796

Facility  
PIC: Mr. Jose Gonzalez

Applicability: All hands

Frequency: Semi-Annualy

Initiating Authority: Facility policy, Hired advisor, U.S. Coast Guard

Participating Elements: All hands

Scope: Unannounced activation of personnel with responsibility under the plan, deploy mayor equipment and an explanation provided of the procedures. A practice of the spill mitigation procedures will be explained.

Objectives: Demonstate ability of the facility personnel to responde, deploy, and operate facility response equipment and evaluate the effectiveness of the response.

Certification: To be performed by Regulatory Compliance 787-869-7796

Verification: U.S. Coast Guard, EPA

Records: This one form, equipment records and any atachment described herein.

Retention Period: 3 Years minimum

Scenario: *simulated a wcs at facility. Deployed boom at waterfront on 2 occasions. Discussed Boom deployment strategies in the area and Sensitive Maps were explained.*

Lessons Learned: *Need more practice deploying boom.*

Certification:

I certify under penalty of law that this document and the procedures performed were prepared and carried out under my direction and/or supervision in accordance with a system designed to assure that the procedures, drill's and exercises were performed. Based on my personal observation the information contained is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**Raymond Huddleston**

Name

Signature



**FACILITY RESPONSE PLAN**

2

**QI NOTIFICATION & TABLE TOP (Quarterly)**

Facility: Petrowest, Inc.

Date: 2/25/10

Address: Carretera 341, Mayaguez, P.R. 00681

Start: 0830 End: 0910

Location: Mayaguez

Drill PIC: Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

Facility PIC: Mr. Jose Gonzalez

Applicability: Spill management team and qualified individual

Frequency: Quarterly

Initiating Authority: Facility policy, Hired advisor, U.S. Coast Guard, EPA

Participating Elements: Facility personnel and qualified individuals

Scope: Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if different, exercise knowledge of the facility response plan.

Objectives: Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

Certification: To be performed by Regulatory Compliance 787-869-7796

Verification: U.S. Coast Guard, EPA

Records: This one form, equipment records and any attachment described herein.

Retention Period: 3 Years minimum

Scenario:

Discussed Area Map and identification of sensitive areas.  
Tested communications and all were fine except one.

Lessons Learned and Outcome:

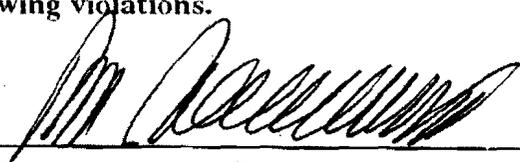
Need more familiarization with the maps and one phone was changed.

Certification:

I certify under penalty of law that this document and the procedures performed were prepared and carried out under my direction and/or supervision in accordance with a system designed to assure that the procedures, drill's and exercises were performed. Based on my personal observation the information contained is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Raymond Huddleston

Name



Signature

**FACILITY RESPONSE PLAN**

**2**

**QI NOTIFICATION & TABLE TOP (Quarterly)**

**Facility:** Petrowest, Inc.

**Date:** 8/25/09

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0715 **End:** 0830

**Location:** Mayaguez

**Drill PIC:** Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

**Facility PIC:** Mr. Jose Gonzalez

**Applicability:** Spill management team and qualified individual

**Frequency:** Quarterly

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Facility personnel and qualified individuals

**Scope:** Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if different, exercise knowledge of the facility response plan.

**Objectives:** Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any attachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

Vessel discharged 30,000 gallons of diesel fuel into Bahia de Mayaguez. Winds are from the East at 10 knots, tide is ebbing.

**Lessons Learned:**

**Certification:**

I certify under penalty of law that this document and the procedures performed were prepared and carried out under my direction and/or supervision in accordance with a system designed to assure that the procedures, drill's and exercises were performed. Based on my personal observation the information contained is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**Raymond Huddleston**

Name



Signature

<b>FACILITY RESPONSE PLAN</b>	<b>4</b>
<b>UNANNOUNCED EQUIPMENT DEPLOYMENT (Yearly)</b>	

<b>Facility:</b> Petrowest, Inc.	<b>Date:</b> MAY 5, 2009
<b>Address:</b> Carretera 341, Mayaguez, P.R, 00681	<b>Start:</b> 0800 <b>End:</b> 1030
<b>Location:</b> Mayaguez	<b>Excercise PIC:</b> Raymond B. Huddleston
<b>Facility PIC:</b> Mr. Jose Gonzalez	<b>Regulatory Compliance</b> 787-869-7796

**Applicability:** All hands

**Frequency:** Annualy

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard

**Participating Elements:** All hands

**Scope:** Unannounced activation of personnel with responsibility under the plan, deploy mayor equipment and an explanation provided of the procedures. A practice of the spill mitigation procedures will be explained.

**Objectives:** Demonstate ability of the facility personnel to responde, deploy, and operate facility response equipment and evaluate the effectiveness of the response.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

Vessel discharged 30,000 gallons of diesel fuel into Bahia de Mayaguez. Winds are from the East at 10 knots, tide is ebbing.

**Lessons Learned:**

**Certification:**

I certify under penalty of law that this document and the procedures performed were prepared and carried out under my direction and/or supervision in accordance with a system designed to assure that the procedures, drill's and exercises were performed. Based on my personal observation the information contained is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Raymond Huddleston

Name



Signature

<b>FACILITY RESPONSE PLAN</b>	<b>3</b>
<b>TABLE TOP (Yearly)</b>	

**Facility:** Petrowest, Inc. **Date:** November 13, 2008.  
**Address:** Carretera 341, Mayaguez, P.R, 00681 **Start:** 0700 **End:** 0830  
**Location:** Mayaguez **Exercise PIC:** Raymond B. Huddleston  
**Facility PIC:** Mr. Jose Gonzalez **Regulatory Compliance**  
**787-869-7796**

**Applicability:** Spill management team and qualified individuals

**Frequency:** Annualy

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Spill management team and qualified individuals

**Scope:** Table top scenario, exercise the spill management team organization, communications and decision making in managing a spill response. All 3 types of discharge will be addressed.

**Objectives:** Ascertain spill management team and QI knowledge in: Knowledge of the FRP, proper notification, communications system, ability to access OSRO, coordination with internal personnel for spill response, NRC notification, ESI information comprehension.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

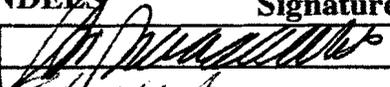
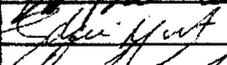
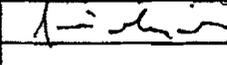
**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**  
 Facility was performing transfer operations to a Coast Guard cutter when the transfer was ordered to stop because oil was being discharged through one of the vessels vents. Approximately 5,000 gallons of diesel fuel were spilled into the water.

**Evaluation:**

Name	ATTENDEES	Signature
Raymond B. Huddleston		
EDWIN MARTINEZ		
OSCAR L. Tronche Lopez		
Jose Gonzalez		

**FACILITY RESPONSE PLAN**

**2**

**QI NOTIFICATION (Quarterly)**

**Facility:** Petrowest, Inc.

**Date:** November 13, 2008

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0700

**End:** 0830

**Location:** Mayaguez

**Drill PIC:** Raymond B. Huddleston

**Facility PIC:** Mr. Jose Gonzalez

**Regulatory Compliance**  
787-869-7796

**Applicability:** Spill management team and qualified individual

**Frequency:** Quarterly

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Facility personnel and qualified individuals

**Scope:** Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if diferent, exercise knowledge of the facility response plan.

**Objectives:** Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**scenario:**

Facility was performing transfer operations to a Coast Guard cutter when the transfer was ordered to stop because oil was being discharged through one of the vessels vents. Approximately 5,000 gallons of diesel fuel were spilled into the water.

**Evaluation:**

Name	ATTENDEES	Signature
Raymond B. Huddleston		
Eowin Klabiner		
Jose Gonzalez		
Dora F Troche Lopez		

<b>FACILITY RESPONSE PLAN</b>	<b>5</b>
<b>HOSE/PIPELINE INSPECTION RECORD</b>	

**Petrowest, Inc.**

Hose/Pipe ID#: <input style="width: 90%;" type="text" value="1"/>	Manufacturer: <input style="width: 90%;" type="text" value="Petro Vac"/>
Hose Length: <input style="width: 90%;" type="text" value="50"/>	Hose Product: <input style="width: 90%;" type="text" value="Oil Service"/>
Hose Diameter: <input style="width: 90%;" type="text" value="2"/>	Hose Fittings: <input style="width: 90%;" type="text" value="PJG (PCMP)"/>
Hose MAWP: <input style="width: 90%;" type="text" value="150 PSI"/>	Hose Built Date: <input style="width: 90%;" type="text" value="UNK"/>
Test Pressure: <input style="width: 90%;" type="text" value="225 PSI"/>	Hose Test Time: <input style="width: 90%;" type="text" value="10 min."/>

**Hose Test Procedure:**

Hose filled with water and plugged with fittings equipped with valve and gauge. Hose is pressurized with air to 225 PSI. Air valve is shut and timer started. Hose must maintain 225 PSI for a minimum of 10 minutes. After, test hose is marked with Test date, MAWP and name of product intended.

**WARNING:** All hoses which may be connected to each other in order to create a longer length of hose must be additionally tested all connected together as if one long hose.

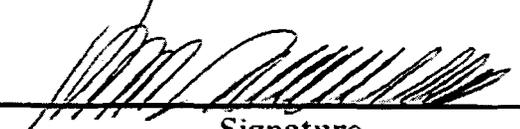
In-Line testing performed? Yes  No

**Restrictions:**

1. Hose shall not be used for products other than authorized by its markings.
2. Hose will not be used at a pressure of more than 150 PSI.
3. Hose will not be connected to any pumping equipment which may exceed 150 PSI.

**Hose Inspection Performed by Raymond B. Huddleston of  
Regulatory Compliance, 787-869-7796 / 869-8241 Fax.**

11/12/09  
Inspection Date

  
Signature

<b>FACILITY RESPONSE PLAN</b>	<b>5</b>
<b>HOSE/PIPELINE INSPECTION RECORD</b>	

**Petrowest, Inc.**

Hose/Pipe ID# <input style="width: 90%;" type="text" value="2"/>	Manufacturer: <input style="width: 90%;" type="text" value="good year"/>
Hose Length <input style="width: 90%;" type="text" value="251"/>	Hose Product: <input style="width: 90%;" type="text" value="oil service"/>
Hose Diameter <input style="width: 90%;" type="text" value="3"/>	Hose Fittings: <input style="width: 90%;" type="text" value="P+G (PUMP)"/>
Hose MAWP: <input style="width: 90%;" type="text" value="150 PSI"/>	Hose Built Date: <input style="width: 90%;" type="text" value="unk"/>
Test Pressure <input style="width: 90%;" type="text" value="225 PSI"/>	Hose Test Time: <input style="width: 90%;" type="text" value="10min"/>

**Hose Test Procedure:**

Hose filled with water and plugged with fittings equipped with valve and gauge. Hose is pressurized with air to 225 PSI. Air valve is shut and timer started. Hose must maintain 225 PSI for a minimum of 10 minutes. After, test hose is marked with Test date, MAWP and name of product intended.

**WARNING:** All hoses which may be connected to each other in order to create a longer length of hose must be additionally tested all connected together as if one long hose.

In-Line testing performed? Yes  No

**Restrictions:**

1. Hose shall not be used for products other than authorized by its markings.
2. Hose will not be used at a pressure of more than 150 PSI.
3. Hose will not be connected to any pumping equipment which may exceed 150 PSI.

**Hose Inspection Performed by Raymond B. Huddleston of  
Regulatory Compliance, 787-869-7796 / 869-8241 Fax.**

11/12/04  
Inspection Date

  
Signature

U.S. Department of  
Homeland Security

United States  
Coast Guard



FACILITY INSPECTION REPORT

FACILITY: Penonolas

DATE: 11/2/07 TIME: 0930

Sector San Juan  
Prevention Department  
#5 La Puntilla Final  
San Juan, PR 00901  
Phone: (787) 729-2376  
Fax: (787) 729-2377

INSPECTION TYPE:

- SECURITY (MTSA)
- BULK OIL/HAZMAT
- LNG/LHG
- DWF

- ANNUAL
- SPOT CHECK
- FOLLOW-UP
- TRANSFER MONITOR

MISLE # 3075511

DEFICIENCY DESCRIPTION	CFR CITE	COTP REQUIREMENT
1. <del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
2. <del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
3. <del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
4. <del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>
<del>_____</del>	<del>_____</del>	<del>_____</del>

COMMENTS

\_\_\_\_\_

Facility Representative: \_\_\_\_\_

Signature: Rosendo B. Haddad

USCG Inspector: \_\_\_\_\_

Signature: \_\_\_\_\_

**\*\*This report is for information only. Notice will be given if penalty action is initiated.  
MTSA inspection results are considered Sensitive Security Information.\*\***



FACILITY INSPECTION REPORT

FACILITY: PETROWEST

DATE: 21 DEC 10 TIME: 1003

Sector San Juan  
Prevention Department  
#5 La Puntilla Final  
San Juan, PR 00901  
Phone: (787) 729-2376  
Fax: (787) 729-2377

INSPECTION TYPE:

- SECURITY (MTSA)
- BULK OIL/HAZMAT (MORREP)
- LNG/LHG
- DWF
- ANNUAL
- SPOT CHECK
- FOLLOW-UP
- TRANSFER MONITOR

MISLE # 391092

DEFICIENCY DESCRIPTION	CFR CITE	COTP REQUIREMENT
1. <u>CONTAINMENT OF</u>	<u>49 CFR 154.545</u>	<u>PATCH OR REPLACE ACCOUNT WITHIN 30 DAYS</u>
<u>HAZARDOUS MATERIALS</u>	<u>49 CFR 154.545</u>	<u>WITHIN 30 DAYS</u>
<u>WILL NOT LEAK</u>	<u>49 CFR 154.545</u>	
<u>DSL</u>		
2. _____		
3. _____		
4. _____		

COMMENTS

\_\_\_\_\_

Facility Representative: \_\_\_\_\_

Signature: \_\_\_\_\_

USCG Inspector: JAMES M. ST...

Signature: \_\_\_\_\_

**\*\*This report is for information only. Notice will be given if penalty action is initiated. MTSA inspection results are considered Sensitive Security Information.\*\***

U.S. Department of Homeland Security

United States Coast Guard



FACILITY INSPECTION REPORT

FACILITY: RETROWEST

DATE: 09 DEC 09 TIME: 0930

Sector San Juan  
Prevention Department  
#5 La Puntilla Final  
San Juan, PR 00901  
Phone: (787) 729-2376  
Fax: (787) 729-2377

INSPECTION TYPE:

- SECURITY (MTSA)
- ANNUAL
- BULK OIL/HAZMAT (MORSE)
- SPOT CHECK
- LNG/LHG
- FOLLOW-UP
- DWF
- TRANSFER MONITOR

MISLE # 3646935

DEFICIENCY DESCRIPTION	CFR CITE	COTP REQUIREMENT
1. ANNUAL HAZARDOUS WASTE TANKER TRAINING HAS NOT BEEN CONDUCTED	33CFR154.1050(A)	COMPLETE TRAINING AND PROVIDE EVIDENCE W/I 30 DAYS
2. HOSE # 2 BODDAGE HOLE	33CFR156.170(C)(3)(i)	REPAIR OR REPLACE HOLE #2 PRIOR TO CONDUCTING ANY MARINE TRANSFERS
3. <del>_____</del>	<del>_____</del>	<del>_____</del>
4. <del>_____</del>	<del>_____</del>	<del>_____</del>

COMMENTS

Facility Representative: [Signature]

Signature: [Signature]

USCG Inspector: JEFFREY MERRELL

Signature: [Signature]

\*\*This report is for information only. Notice will be given if penalty action is initiated. MTSA inspection results are considered Sensitive Security Information.\*\*



FACILITY INSPECTION REPORT

Sector San Juan  
Prevention Department  
#5 La Puntilla Final  
San Juan, PR 00901  
Phone: (787) 729-2376  
Fax: (787) 729-2377

FACILITY: PETROWEST  
DATE: 17 NOV 08 TIME: 10:15

INSPECTION TYPE:

- SECURITY (MTSA)  ANNUAL  
 BULK OIL/HAZMAT (HORE)  SPOT CHECK  
 LNG/LHG  FOLLOW-UP  
 DWF  TRANSFER MONITOR

MISLE # 3361401

DEFICIENCY DESCRIPTION	CFR CITE	COTP REQUIREMENT
1. <u>COULD NOT SEE EVIDENCE OF WARNING SIGNS</u>	<u>33CFR154.735(V)</u>	<u>PROVIDE EVIDENCE OF WARNING SIGNS W/I 30 DAYS</u>
2. <del>_____</del>	<del>_____</del>	<del>_____</del>
3. <del>_____</del>	<del>_____</del>	<del>_____</del>
4. <del>_____</del>	<del>_____</del>	<del>_____</del>

COMMENTS

RE ADDED TO THE HOSES  
HAVE BEEN AVAILABLE FOR INSPECTION DURING  
FOUR MONTHS FOR WARNING SIGNS

Facility Representative: [Signature] Signature: [Signature]  
 USCG Inspector: [Signature] Signature: [Signature]

\*\*This report is for information only. Notice will be given if penalty action is initiated.  
 MTSA inspection results are considered Sensitive Security Information.\*\*

U.S. Department of Homeland Security

United States Coast Guard



FACILITY INSPECTION REPORT

Sector San Juan  
Prevention Department  
#5 La Puntilla Final  
San Juan, PR 00901  
Phone: (787) 729-2376  
Fax: (787) 729-2377

FACILITY: PETROLIST INC

DATE: 11/27/06 TIME: 0900

INSPECTION TYPE:

- SECURITY (MTSA)
- BULK OIL/HAZMAT
- LNG/LHG
- DWF

- ANNUAL
- SPOT CHECK
- FOLLOW-UP
- TRANSFER MONITOR

MISLE # 2928 11

DEFICIENCY DESCRIPTION	CFR CITE	COTP REQUIREMENT
1. Transfer hoses not labeled	33CFR151.500	Conduct annual test of transfer hoses and for results to COTP. 30 days
2.		
3.		
4.		

COMMENTS

Facility Representative: [Signature]

Signature: [Signature]

USCG Inspector: [Signature]

Signature: [Signature]

\*\*This report is for information only. Notice will be given if penalty action is initiated. MTSA inspection results are considered Sensitive Security Information.\*\*

## QUALIFIED INDIVIDUAL NOTIFICATION EXERCISE

<b>Facility:</b>	PetroWest
<b>Exercise Date &amp; Time:</b>	12/16/05      Commenced at: 0830
<b>Exercise Location:</b>	Mayaguez Office (conference room)
<b>Applicability:</b>	Facility spill management team and qualified individuals
<b>Frequency:</b>	Quarterly
<b>Initiating Authority:</b>	Facility policy, Hired advisor, U.S. Coast Guard, EPA
<b>Participating Elements:</b>	Facility personnel & Qualified Individuals
<b>Scope:</b>	Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if different, exercise knowledge of response plan.
<b>Objectives:</b>	Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan.
<b>Certification:</b>	To be performed by Regulatory Compliance (787-869-7796)
<b>Verification:</b>	U.S. Coast Guard, EPA
<b>Records:</b>	This one form and any attachment described in the same.
<b>Retention Period:</b>	3 Years
<b>Record Location:</b>	Facility Response Plan appendix 8.
<b>Evaluation:</b>	To be performed by third party advisor, Regulatory Compliance (787-869-7796)

### SCENARIO DESCRIPTION

(Describes what type of scenario was presented to the participants, from where did it spill, what was spilled, how much, etc.)  
 Discharge of 10,000 gallons of diesel from facility tank storage area. Oil reached the water and through the storm drain at the facility and reached the beach across the road. Winds are from the East at approximately 5 MPH making the oil run towards the Mayaguez Pier where the DR Ferry is moored.

### EVALUATION

(describes what was observed, did participants address all areas of concern, ck ESI's, strategy maps, comms ckoff, donned PPE, etc.)  
 All COMS were operational with the exception of the coast guard # which there are still confused as to which one it is.

### RECOMENDED CHANGES & TIME TABLE

None.

PARTICIPANTS		Sequence
Name	Signature	
Sahid Valentin Cardenas	<i>[Signature]</i>	<input checked="" type="checkbox"/> Brief
Ryan Berroiz Martinez	<i>[Signature]</i>	<input checked="" type="checkbox"/> Call contacts
OMAR MERALLES	<i>[Signature]</i>	<input checked="" type="checkbox"/> RESPLAN know
EDWIN MARTINEZ RODRIGUEZ	<i>[Signature]</i>	<input checked="" type="checkbox"/> SMT coordination
José Santos Hernández	<i>[Signature]</i>	<input checked="" type="checkbox"/> Recordkeeping
Daniel Martínez Minguola	<i>[Signature]</i>	<input checked="" type="checkbox"/> Critique & Log
BRYAN NOVALES RODRIGUEZ	<i>[Signature]</i>	<input type="checkbox"/>
JAVIER E. NOVALES RODRIGUEZ	<i>[Signature]</i>	<input type="checkbox"/>
<b>MODERATOR</b>		
<b>Name &amp; Title:</b>	Raymond B. Huddleston, QA Manager, Regulatory Compliance	
<b>Contact Info:</b>	PMB-13 HC-72 Box 3766 Naranjito, P.R. 00719 787-869-7796	
<b>Print Name:</b>	Raymond Huddleston	<b>Signature:</b> <i>[Signature]</i>

OMAR MERALLES      Omar Meralles

## SPILL MANAGEMENT TEAM TABLE TOP EXERCISE

<b>Facility:</b>	Petrowest
<b>Exercise Date &amp; Time:</b>	12/16/05 <span style="float: right;">Commenced at: 0830</span>
<b>Exercise Location:</b>	MAYAGUEZ OFFICES CONFERENCE ROOM
<b>Applicability:</b>	Facility spill management team and qualified individuals
<b>Frequency:</b>	Annually
<b>Initiating Authority:</b>	Facility policy, hired advisor, U.S. Coast Guard, EPA
<b>Participating Elements:</b>	Spill management team and qualified individuals as established in the Facility Response Plan.
<b>Scope:</b>	Table top scenario, exercise the spill managements team organization, communication and decision making in managing a spill response. One exercise will consider an average most probable discharge and another will consider a worst-case discharge.
<b>Objectives:</b>	Ascertain spill management team and QI knowledge in: Knowledge of the Response Plan, Proper notifications, Communications systems, Ability to access the OSRO, Coordination with internal personnel for spill response, NRC notifications, ESI information comprehension.
<b>Certification:</b>	To be performed by Regulatory Compliance (787-869-7796)
<b>Verification:</b>	U.S. Coast Guard, EPA
<b>Records:</b>	This one form and any attachment described in the same.
<b>Retention Period:</b>	3 Years
<b>Record Location:</b>	Facility Response Plan appendix 8.
<b>Evaluation:</b>	To be performed by third party advisor, Regulatory Compliance (787-869-7796)

### SCENARIO DESCRIPTION

(Describes what type of scenario was presented to the participants, from where did it spill, what was spilled, how much, etc.)  
 Discharge of 10,000 gallons of diesel from facility tank storage area. Oil reached the water and through the storm drain at the facility and reached the beach across the road. Winds are from the East at approximately 5 MPH making the oil run towards the Mayaguez Pier where the DR Ferry is moored.

### EVALUATION

(describes what was observed, did participants address all areas of concern, ck ESI's, strategy maps, comms ckoff, donned PPE, etc.)  
 all went well, employees understood the purpose of the drill and had location of the equipment readily available. they all understood their responsibilities

### RECOMENDED CHANGES & TIME TABLE

NONE.

PARTICIPANTS		Sequence
Name	Signature	
Sahiel Velez Jim Cardona	<i>[Signature]</i>	<input checked="" type="checkbox"/> Brief
Rogelio Barrios Martinez	<i>[Signature]</i>	<input checked="" type="checkbox"/> Act Scenarios 1
OSCAR TORRES OLIVERA	<i>[Signature]</i>	<input checked="" type="checkbox"/> Call contacts
EDWIN MARTINEZ IRIARTE	<i>[Signature]</i>	<input checked="" type="checkbox"/> RESPLAN know
José Sanchez Hernandez	<i>[Signature]</i>	<input checked="" type="checkbox"/> SMT coordination
Daniel Martinez Mangual	<i>[Signature]</i>	<input checked="" type="checkbox"/> Act Scenarios 2
BRYAN HERRERA RODRIGUEZ	<i>[Signature]</i>	<input checked="" type="checkbox"/> SMT coordination
JAVIER O. NOYALES RODRIGUEZ	<i>[Signature]</i>	<input checked="" type="checkbox"/> Recordkeeping
	<b>MODERATOR</b>	<input checked="" type="checkbox"/> Critique & Log
<b>Name &amp; Title:</b>	Raymond B. Huddleston, QA Manager, Regulatory Compliance	
<b>Contact Info:</b>	PMB-13 HC-72 Box 3766 Naranjito, P.R. 00719 787-869-7796	
<b>Print Name:</b>	Raymond Huddleston	<b>Signature:</b> <i>[Signature]</i>

OSCAR MARTINEZ *[Signature]*

# FACILITY RESPONSE PLAN

## TABLE TOP

**Facility:** Petrowest, Inc.

**Date:** April 27, 2006

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0810      **End:**

**Location:** Mayaguez

**Exercise PIC:** Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

**Facility PIC:** Mr. Jose Sanchez

**Applicability:** Spill management team and qualified individuals

**Frequency:** Annually

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Spill management team and qualified individuals

**Scope:** Table top scenario, exercise the spill management team organization, communications and decision making in managing a spill response. All 3 types of discharge will be addressed.

**Objectives:** Ascertain spill management team and QI knowledge in: Knowledge of the FRP, proper notification, communications system, ability to access OSRO, coordination with internal personnel for spill response, NRC notification, ESI information comprehension.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any attachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

10,000 Galon Spill at the Mayaguez pier while unloading Used Oil from a USCG Cutter. Winds are from the East at 10 mph and there is a vessel moored at the tuna plants.

**Evaluation:** All went well, Better participation & comprehension since last drill

Name	ATTENDEES	Signature
Javier E. Morales Rodriguez		Javier Morales Rodriguez
Daniel Martinez Minguella		Daniel Martinez Minguella
Edwin Martinez Rodriguez		Edwin Martinez Rodriguez
Oscar Roche Ortiz		Oscar Roche Ortiz
Raymond Valentin Complexo		Raymond Valentin Complexo
Jose A. Sanchez		Jose A. Sanchez

# FACILITY RESPONSE PLAN

## QI NOTIFICATION

**Facility:** Petrowest, Inc.

**Date:** April 27, 2006

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0810 **End:**

**Location:** Mayaguez

**Drill PIC:** Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

**Facility PIC:** Mr. Jose Sanchez

**Applicability:** Spill management team and qualified individual

**Frequency:** Quarterly

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Facility personnel and qualified individuals

**Scope:** Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if different, exercise knowledge of the facility response plan.

**Objectives:** Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any attachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

10,000 Galon Spill at the Mayaguez pier while unloading Used Oil from a USCG Cutter. Winds are from the East at 10 mph and there is a vessel moored at the tuna plants.

**Evaluation:**

*All went well. Better participation and comprehension since last Drill.*

Name	ATTENDEES	Signature
JAVIERE NOVALES RODRIGUEZ		<i>Javiera Novales Rodriguez</i>
Daniel Martinez Mungueta		<i>Daniel Martinez Mungueta</i>
EDWIN MARTINEZ JIMENEZ		<i>Edwin Martinez Jimenez</i>
Oscar Trache Ortiz		<i>Oscar Trache Ortiz</i>
Raymond Valentin Cuslerio		<i>Raymond Valentin Cuslerio</i>
Jose A. Sanchez		<i>Jose A. Sanchez</i>

## FACILITY RESPONSE PLAN

### UNANNOUNCED EQUIPMENT DEPLOYMENT (Yearly)

**Facility:** Petrowest, Inc. **Date:** 10/12/06  
**Address:** Carretera 341, Mayaguez, P.R. 00681 **Start:** 0830 **End:** 1000  
**Location:** Mayaguez **Exercise PIC:** Raymond B. Huddleston  
**Facility PIC:** Mr. Jose Sanchez **Regulatory Compliance**  
**787-869-7796**

**Applicability:** All hands

**Frequency:** Annually

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard

**Participating Elements:** All hands

**Scope:** Unannounced activation of personnel with responsibility under the plan, deploy mayor equipment and an explanation provided of the procedures. A practice of the spill mitigation procedures will be explained.

**Objectives:** Demonstate ability of the facility personnel to responde, deploy, and operate facility response equipment and evaluate the effectiveness of the response.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

5,000 Gallon spill at facility premises, oil has reached the storm drain which leads into the water. Shore has already been impacted and oil continues to flow from the storm drain because the drain is full of oil and the tide is flooding.

**Evaluation:** Equipment deployed PROMPTLY. Employees aware of procedures and safety requirements.

Name	ATTENDEES	Signature
Reggie Borroero		<i>[Signature]</i>
Daniel Martinez		<i>[Signature]</i>
Javier Morales		<i>[Signature]</i>
Oscar Roche		<i>[Signature]</i>
BRYAN MORALES		<i>[Signature]</i>
Humberto Torres Herzo		<i>[Signature]</i>
EDWIN MARTINEZ		<i>[Signature]</i>

# FACILITY RESPONSE PLAN

## TABLE TOP (Yearly)

**Facility:** Petrowest, Inc.

**Date:** 10/12/06

**Address:** Carretera 341, Mayaguez, P.R, 00681

**Start:** 0830      **End:** 1000

**Location:** Mayaguez

**Exercise PIC:** Raymond B. Huddleston  
Regulatory Compliance  
787-869-7796

**Facility PIC:** Mr. Jose Sanchez

**Applicability:** Spill management team and qualified individuals

**Frequency:** Annualy

**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA

**Participating Elements:** Spill management team and qualified individuals

**Scope:** Table top scenario, exercise the spill management team organization, communications and decision making in managing a spill response. All 3 types of discharge will be addressed.

**Objectives:** Ascertain spill management team and QI knowledge in: Knowledge of the FRP, proper notification, communications system, ability to access OSRO, coordination with internal personnel for spill response, NRC notification, ESI information comprehension.

**Certification:** To be performed by Regulatory Compliance 787-869-7796

**Verification:** U.S. Coast Guard, EPA

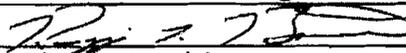
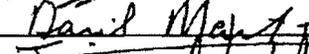
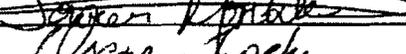
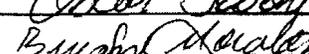
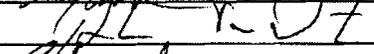
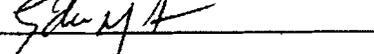
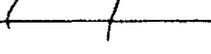
**Records:** This one form, equipment records and any atachment described herein.

**Retention Period:** 3 Years minimum

**Scenario:**

5,000 Gallon spill at facility premises, oil has reached the storm drain which leads into the water. Shore has already been impacted and oil continues to flow from the storm drain because the drain is full of oil and the tide is flooding.

**Evaluation:** Personnel understood procedures and Response Plan. Emergency procedures were recited and ESI's reviewed

Name	ATTENDEES	Signature
Reggie Barrios		
Daniel Martinez		
Javier Morales		
Oscar Vasquez		
BRYAN MORALOS		
Humberto Torres Otero		
EDWIN MARTINEZ		

<b>FACILITY RESPONSE PLAN</b>
<b>QI NOTIFICATION (Quarterly)</b>

**Facility:** Petrowest, Inc. **Date:** 1/12/06  
**Address:** Carretera 341, Mayaguez, P.R, 00681 **Start:** 0830 **End:** 1000  
**Location:** Mayaguez **Drill PIC:** Raymond B. Huddleston  
**Facility PIC:** Mr. Jose Sanchez **Regulatory Compliance**  
787-869-7796  
**Applicability:** Spill management team and qualified individual  
**Frequency:** Quarterly  
**Initiating Authority:** Facility policy, Hired advisor, U.S. Coast Guard, EPA  
**Participating Elements:** Facility personnel and qualified individuals  
**Scope:** Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if diferent, exercise knowledge of the facility response plan.

**Objectives:** Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan

**Certification:** To be performed by Regulatory Compliance 787-869-7796  
**Verification:** U.S. Coast Guard, EPA  
**Records:** This one form, equipment records and any atachment described herein.  
**Retention Period:** 3 Years minimum

**Scenario:**  
 5,000 Gallon spill at facility premises, oil has reached the storm drain which leads into the water. Shore has already been impacted and oil continues to flow from the storm drain because the drain is full of oil and the tide is flooding.

**Evaluation:** *performed notifications and all phones remained current*

Name	ATTENDEES	Signature
Reggie Borvevo		<i>[Signature]</i>
Daniel Martinez		<i>[Signature]</i>
Javier Morales		<i>[Signature]</i>
Oscar Trach		<i>[Signature]</i>
BRYAN MORALES		<i>[Signature]</i>
Humberto Torres Otero		<i>[Signature]</i>
EDWIN MARTINEZ		<i>[Signature]</i>

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander  
United States Coast Guard  
Sector San Juan

#5 La Puntilla Final  
San Juan, PR 00901  
Staff Symbol: p  
Phone: (787) 729-2376  
Fax: (787) 729-2377

16465  
P 123-05  
March 11, 2005

PETROWEST, INC  
P.O. Box 126  
Mayaguez, PR 00681

Dear Sir or Madam:

The Captain of the Port finds that PETROWEST, INC. Oil Spill Response Plan meets the requirements of Title 33 Code of Federal Regulations Part 154, Subpart F (Response Plans for Oil Facilities). Your plan has been approved and a signed copy is enclosed. Your plan will remain valid for five years from the date of this approval letter, at which time you will be required to resubmit your plan for approval. You are required to submit plan updates to this office whenever changes are made.

Any questions or comments regarding this issue should be directed to Chief Petty Officer Sean Baker at (787) 289-2086

Sincerely,

A handwritten signature in cursive script, appearing to read "E. Emeric".

E. EMERIC  
Commander, U.S. Coast Guard  
By Direction of Captain of the Port

## QUALIFIED INDIVIDUAL NOTIFICATION EXERCISE

<b>Facility:</b>	<i>Petro WEST INC.</i>
<b>Exercise Date &amp; Time:</b>	<i>050409 1215</i>
<b>Exercise Location:</b>	<i>Main offices</i>
<b>Applicability:</b>	Facility spill management team and qualified individuals
<b>Frequency:</b>	Quarterly
<b>Initiating Authority:</b>	Facility policy, Hired advisor, U.S. Coast Guard, EPA
<b>Participating Elements:</b>	Facility personnel & Qualified Individuals
<b>Scope:</b>	Table top scenario, exercise communications between facility personnel, qualified individuals and command & control personnel if different.
<b>Objectives:</b>	Contact must be made with all related personnel or designated alternates as described in the Facility Response Plan.
<b>Certification:</b>	To be performed by Regulatory Compliance (787-869-7796)
<b>Verification:</b>	U.S. Coast Guard, EPA
<b>Records:</b>	This one form and any attachment described in the same.
<b>Retention Period:</b>	3 Years
<b>Record Location:</b>	Facility Response Plan appendix 8.
<b>Evaluation:</b>	To be performed by third party advisor, Regulatory Compliance (787-869-7796)

### EVENT SUMMARY

*Perform all Notifications all went well no issues*

ATTENDEES		Sequence
Name	Signature	
		<input checked="" type="checkbox"/> Brief
		<input checked="" type="checkbox"/> Call QI
		<input checked="" type="checkbox"/> Call AQI
		<input checked="" type="checkbox"/> Call SMT
		<input checked="" type="checkbox"/> Call COM&CONT
		<input checked="" type="checkbox"/> Call OSRO
		<input checked="" type="checkbox"/> Call USCG
		<input checked="" type="checkbox"/> Critique
		<input checked="" type="checkbox"/> Log

### ATTACHMENTS

--	--

### MODERATOR

<b>Name &amp; Title:</b>	Raymond B. Huddleston, QA Manager
<b>Organization:</b>	Regulatory Compliance
<b>Address:</b>	PMB-13 HC-72 Box 3766 Naranjito, P.R. 00719
<b>Phone &amp; Fax:</b>	787-869-7796 / Fax 787-869-8241
<b>Print Name:</b>	<i>Raymond B. Huddleston</i>
<b>Signature:</b>	

## SPILL MANAGEMENT TEAM TABLE TOP EXERCISE

<b>Facility:</b>	<i>Petro West</i>
<b>Exercise Date &amp; Time:</b>	<i>050908 1245</i>
<b>Exercise Location:</b>	<i>Main P. 20000005</i>
<b>Applicability:</b>	Facility spill management team and qualified individuals
<b>Frequency:</b>	Annually
<b>Initiating Authority:</b>	Facility policy, hired advisor, U.S. Coast Guard, EPA
<b>Participating Elements:</b>	Spill management team and qualified individuals as established in the Facility Response Plan.
<b>Scope:</b>	Table top scenario, exercise the spill managements team organization, communication and decision making in managing a spill response. One exercise will consider an average most probable discharge and another will consider a worst-case discharge.
<b>Objectives:</b>	Ascertain spill management team and QI knowledge in: Knowledge of the Response Plan, Proper notifications, Communications systems, Ability to access the OSRO, Coordination with internal personnel for spill response, NRC notifications, ESI information comprehension.
<b>Certification:</b>	To be performed by Regulatory Compliance (787-869-7796)
<b>Verification:</b>	U.S. Coast Guard, EPA
<b>Records:</b>	This one form and any attachment described in the same.
<b>Retention Period:</b>	3 Years
<b>Record Location:</b>	Facility Response Plan appendix 8.
<b>Evaluation:</b>	To be performed by third party advisor, Regulatory Compliance (787-869-7796)

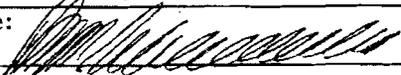
### EVENT SUMMARY

*Needed words but redid 2 times.*

ATTENDEES		Sequence
Name	Signature	
		<input type="checkbox"/> Brief
		<input checked="" type="checkbox"/> Call all
		<input checked="" type="checkbox"/> RESPLAN know
		<input checked="" type="checkbox"/> Who do you call
		<input checked="" type="checkbox"/> OSRO access
		<input checked="" type="checkbox"/> SMT coordination
		<input checked="" type="checkbox"/> Call NRC
		<input checked="" type="checkbox"/> ESI Know
		<input checked="" type="checkbox"/> Critique & Log

### ATTACHMENTS

### MODERATOR

<b>Name &amp; Title:</b>	Raymond B. Huddleston, QA Manager
<b>Organization:</b>	Regulatory Compliance
<b>Address:</b>	PMB-13 HC-72 Box 3766 Naranjito, P.R. 00719
<b>Phone &amp; Fax:</b>	787-869-7796 / Fax 787-869-8241
<b>Print Name:</b>	<i>Raymond B. Huddleston</i>
<b>Signature:</b>	

## EQUIPMENT DEPLOYMENT EXERCISE

<b>Facility:</b>	Petro West Inc.
<b>Exercise Date &amp; Time:</b>	050408 1300
<b>Exercise Location:</b>	Beach in front of main office
<b>Applicability:</b>	All facility personnel with responsibilities under the plan.
<b>Frequency:</b>	Semiannually (every 6 month)
<b>Initiating Authority:</b>	Facility policy, hired advisor, U.S. Coast Guard, EPA
<b>Participating Elements:</b>	All facility personnel with responsibilities under the plan.
<b>Scope:</b>	Deploy and operate facility owned and operated response equipment identified in the Response Plan. All personnel will be briefed in the capacities and usage of the equipment and the maintenance procedures required to maintain the same in adequate working order and reliability. Identification of spilled material and the safety precautions applicable to the same.
<b>Objectives:</b>	Demonstrate ability of facility personnel to deploy and operate facility response equipment and review of diversion strategies.
<b>Certification:</b>	To be performed by Regulatory Compliance (787-869-7796)
<b>Verification:</b>	U.S. Coast Guard, EPA
<b>Records:</b>	This one form and any attachment described in the same.
<b>Retention Period:</b>	3 Years
<b>Record Location:</b>	Facility Response Plan appendix 8.
<b>Evaluation:</b>	To be performed by third party advisor, Regulatory Compliance (787-869-7796)

### EVENT SUMMARY

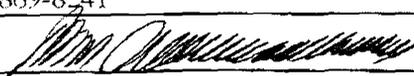
Need work. First time done, will improve next drill.

### ATTENDEES

Name	Signature	Sequence
		<input checked="" type="checkbox"/> Brief
		<input checked="" type="checkbox"/> Call QI's & SMT
		<input checked="" type="checkbox"/> Ready equipment
		<input checked="" type="checkbox"/> Explain scenario
		<input checked="" type="checkbox"/> ID spilled material
		<input checked="" type="checkbox"/> Don PPE
		<input checked="" type="checkbox"/> Deploy equipment
		<input checked="" type="checkbox"/> Critique
		<input checked="" type="checkbox"/> Log

### ATTACHMENTS

### MODERATOR

<b>Name &amp; Title:</b>	Raymond B. Huddleston, QA Manager
<b>Organization:</b>	Regulatory Compliance
<b>Address:</b>	PMB-13 HC-72 Box 3766 Naranjito, P.R. 00719
<b>Phone &amp; Fax:</b>	787-869-7796 / Fax 787-869-8241
<b>Print Name:</b>	Signature: 

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ENCLOSURE 5

# **OIL ENERGY SYSTEMS**

**State Road 341 Km 711  
Mayaguez, P.R. 00681**

## **USED OIL CONTINGENCY PLAN**

**As per 40 C.F.R. Part 279**

**The present document contains information researched and developed by Regulatory Compliance (RCI) and pertaining to Oil Energy Systems. The information is intended for the use of the individual or entity named above. You are hereby notified that any disclosures, copying, distribution or the taking of any action in reliance on the contents of this information, is strictly prohibited, and action will be enforced under the laws of the Commonwealth of Puerto Rico, unless previous written authorization has been given by Regulatory Compliance.**

**Document ID# 1104170938**

**Developed By:  
Regulatory Compliance  
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Naranjito, P.R. 00719-9788  
787-869-7796 / 787-869-2323 Fax  
Email [compliance@hughes.net](mailto:compliance@hughes.net)**

## EMERGENCY COORDINATORS

### Personnel Responsibility To Initiate A Response And Supervise Response Resources Pending Arrival Of The Qualified Individual:

#### **Robin Gonzalez Amador-Spill Director:**

Responsible for the overall cleanup effort and Compliance with the procedures of this plan. Responsible for the filling of the spill form and the contracting of all outside services if necessary. He/She will also be responsible for the follow-up reports to be submitted to the agencies with jurisdiction over the matter. In the event the spill director is not available the Spill Supervisor will assume his duties. Responsible for the hands on and coordination of cleanup effort with the other two employees. In the event the spill supervisor is not available or must assume spill director duties Utility 1 will assume his duties.

#### **Robin Gonzalez Gonzalez-Spill Supervisor:**

Also responsible for the overall cleanup effort and Compliance with the procedures of this plan. In the event the spill director is not available the Spill Supervisor will assume his duties. Responsible for the hands on and coordination of cleanup effort with the other two employees. In the event the spill supervisor is not available or must assume spill director duties Utility 1 will assume his duties.

#### **Utility 1**

Responsible for the coordination, transportation, and commencing the equipment deployment with the assistance of the Spill Director or Spill Supervisor whichever is at the transfer site at the moment. In the event utility 1 is not available or must assume Spill Supervisor duties the remaining personnel not at spill site will assume the responsibilities of transporting and deploying response equipment. *(During this time he will remain with his title of Utility in order to avoid confusion during communications)*

#### **Utility 2**

Responsible for commencing the equipment deployment with the assistance of the Spill Director, Spill Supervisor or Utility 1 whichever is at the transfer site at the moment. In the event utility 1 is not available or must assume Spill Supervisor duties the remaining personnel not at spill site will assume the responsibilities of transporting and deploying response equipment. *(During this time he will remain with his title of Utility in order to avoid confusion during communications)*

The duties of the Spill Director or Utilities are interchangeable with each other depending who is at the transfer site at the time of the incident.

Any of the 3 who is at the transfer site will commence onshore response strategies as described in this plan and filling of the Notification Form contained in section 5 of this plan.

## EMERGENCY PROCEDURES

### Alarms or communication systems:

The facility has an internal alarm system with remote activation devices throughout its premises, all employees and administrative personnel are periodically trained in the usage and circumstances in which such emergency alarm system should be activated and the procedures to follow in the event the system is activated.

### Notification Procedures:

<b>PRIORITIZED NOTIFICATION LIST</b>	
This list comprises the names, titles and contact information of personnel to be contacted in the event of an emergency. The list is arranged by the priority in which they should be called beginning at the top of the list.	
<b>Facility Response Personnel</b>	<b>Spill Management Team</b>
Robin Gonzalez Amador Spill Director 787-553-8555	Robin Gonzalez Amador Spill Director 787-553-8555
Robin Gonzalez Spill Supervisor 787-383-3742	Robin Gonzalez Gonzalez Spill Supervisor 787-383-3742
Jose Gonzalez Amador Alternate Spill Supervisor 787-453-9555	Jose Gonzalez Amador Alternate Spill Supervisor 787-453-9555
Jose Sanchez Spill Management Team 787-462-3619	Jose Sanchez Spill Management Team 787-462-3619
Daniel Martinez Spill Management Team 787-553-5790	Daniel Martinez Spill Management Team 787-553-5790
Carlos Martinez Spill Management Team 787-314-2189	Carlos Martinez Spill Management Team 787-314-2189
Manuel Rodriguez Rodriguez Spill Management Team 787-486-5757	Manuel Rodriguez Rodriguez Spill Management Team 787-486-5757

Manuel Rodriguez Alicea Spill Management Team 787-374-4313	Manuel Rodriguez Alicea Spill Management Team 787-374-4313
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## FEDERAL AGENCIES

National Response Center	<b>1-800-424-8802</b> <u>Ensure to ask for the NRC case number.</u>
U.S. Coast Guard	Captain of the Port (COTP) Coast Guard Prevention Command 787-289-2041 Command Center 787-729-6800 Main Switchboard 787-729-2377 Fax
Environmental Protection Agency	Environmental Protection Agency Caribbean Field Office Centro Europa Bling. 787-729-6829 / 787-977-5870

## STATE AGENCIES

Puerto Rico Department of Natural Resources (Departamento de Recursos Naturales)	P.O. Box 5887 Puerta de Tierra Station San Juan, P.R. 00906 787-724-8772 / 787-724-2340
Environmental Quality Board (Junta de Calidad Ambiental)	Ponce de Leon Avenue #431 Corner of Duarte Street Hato Rey, P.R. 00902 787-767-8181 / 787-766-2823
State Emergency Management Agency (Agencia Estatal para el Manejo de Emergencias)	Office of the Governor La Fortaleza San Juan, P.R. 00901 787-724-0124
Puerto Rico Fire Department (Bomberos de Puerto Rico)	P.O. Box 13325 Santurce, P.R. 00908 9-1-1
Puerto Rico Police (Policia de Puerto Rico)	P.O. Box 70166 Roosevelt Avenue San Juan, P.R. 00936 9-1-1
Puerto Rico Aqueduct and Sewer Authority (Autoridad de Acueductos y Alcantarillados de Puerto Rico)	P.O. Box 7066, Barrio Obrero Station Santurce, P.R. 00902 787-756-2412 / 787-620-2277 787-620-3787F

<b>Puerto Rico Ports Authority</b> (Autoridad de los Puertos)	P.O. Box 362829 San Juan, P.R. 00936-2829 787-729-8973
<b>Puerto Rico Electric Power Authority</b> (Autoridad de Energia Electrica)	P.O. Box 363508 San Juan, P.R. 00936-3508 787-289-3434 / 800-981-2434

# OIL ENERGY SYSTEMS NOTIFICATION CHECKOFF SHEET

- Qualified Individual**  
Robin Gonzalez Amador  
Spill Director  
787-553-8555
- Designated Alternate Qualified Individuals**  
Robin Gonzalez Gonzalez  
Spill Supervisor  
787-383-3742
- National Response Center**  
1-800-424-8802
- U.S. Coast Guard**  
U.S. Coast Guard  
Prevention Command  
787-289-2041  
787-729-6800  
787-729-2377 Fax
- Environmental Protection Agency:**  
Environmental Protection Agency  
Caribbean Field Division  
787-729-6829 / 787-977-5870
- Puerto Rico Department of Natural Resources**  
(Departamento de Recursos Naturales)  
787-724-8772 / 787-724-2340
- Environmental Quality Board**  
(Junta de Calidad Ambiental)  
787-767-8181 / 787-766-2823
- State Emergency Management Agency**  
(Agencia Estatal para el Manejo de Emergencias)  
787-724-0124
- Puerto Rico Fire Department**  
(Bomberos de Puerto Rico)  
911
- Puerto Rico Police**  
(Policia de Puerto Rico)  
911
- Puerto Rico Aqueduct and Sewer Authority**  
(Autoridad de Acueductos y Alcantarillados de Puerto Rico)  
787-756-2412 / 787-620-2277
- Puerto Rico Ports Authority**  
(Autoridad de los Puertos)  
787-729-8973
- Puerto Rico Electric Power Authority**  
(Autoridad de Energia Electrica)  
787-289-3434 / 800-981-2434

## **EMERGENCY ASSESMENT**

An Emergency Assessment will be performed as soon as practicable and without interrupting response operations. The assessment will ensure all pertinent information is collected in order to completely fill the Spill Notification Form enclosed in the following pages.

# NOTIFICATION FORM: \*

Reporting Party		Suspected Responsible Party	
Name _____	_____	Name _____	_____
Phone _____	_____	Phone _____	_____
Company _____	_____	Company _____	_____
Position _____	_____	Position _____	_____
Address _____	_____	Address _____	_____
Address _____	_____	Address _____	_____
Address _____	_____	Address _____	_____
City _____	_____	City _____	_____
State _____	_____	State _____	_____
Zip Code _____	_____	Zip Code _____	_____

Were Materials Discharged? **YES** **NO** Calling for Responsible Party? **YES** **NO**

## INCIDENT DESCRIPTION

Source and/or Cause of Incident: \_\_\_\_\_

Date: \_\_\_\_\_ Time: \_\_\_\_\_

Incident Address/Location: \_\_\_\_\_

Nearest City: \_\_\_\_\_ Distance from City: \_\_\_\_\_

**Storage Tank Container Type: Aboveground/Belowground/Unknown**

Tank Capacity: \_\_\_\_\_ Facility Capacity: \_\_\_\_\_ Latitude: \_\_\_\_\_

Longitude: \_\_\_\_\_ Mile Post or River Mile: \_\_\_\_\_

## MATERIALS

Quantity Discharged: \_\_\_\_\_ Units of Measure: \_\_\_\_\_ Material: \_\_\_\_\_

Quantity in Water: \_\_\_\_\_

## RESPONSE ACTION

Corrective & Mitigation Action Taken: \_\_\_\_\_

## IMPACT

Number of Injuries: \_\_\_\_\_ Number of Fatalities: \_\_\_\_\_

Were There Evacuations Y/N/U?: \_\_\_\_\_ Number Evacuated: \_\_\_\_\_

Was there any Damage Y/N/U?: \_\_\_\_\_ Damage in Dollars: \_\_\_\_\_

## ADDITIONAL INFORMATION

## CALLER NOTIFICATIONS

USCG

EPA

STATE

OTHER

**\* IT IS NOT NECESSARY TO WAIT FOR ALL INFORMATION BEFORE CALLING  
NRC AT 1-800-424-8802**

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## **INCIDENT REPORTING**

In the event that the assessment indicates that the event is of such magnitude that it may be advisable to evacuate local areas, the facility must immediately notify the State authority described in the Emergency Contact sections of this plan.

## MITIGATION PROCEDURES

### Facility Spill Mitigation Procedures For Persistent And Non-Persistent Oil Groups.

*NOTE: Recovery of oil will vary according to the weather conditions and time of day. For example a calm sunny day will be much beneficial for the recovery of spilled product, by the contrary in a rainy and windy day it would be much difficult to perform cleanup operations or even at night where free floating oil is difficult to see.*

### AVERAGE MOST PROBABLE DISCHARGE

The average most probable discharge is calculated as follows:

Considering 1% of the worst case discharge of 2,436.90 barrels (102,350 gallons) is equal to 24.3 barrels (1,020 gallons).

In most spills several response operations will begin at the onset of the response and continue simultaneously. However resource allocation for the **average** most probable discharge should follow this priority:

**1. SECURE THE SOURCE-** Reducing the amount of spilled product is the highest priority and the best course of action to reduce impact. Securing the source may involve patching a pipe or tank, closing a valve, building a containment system, removing product from a damaged vessel, transferring cargo to stop product outflow, or perform salvage operations. Contain any spill by deploying boom or constructing dams, in as many layers as necessary around the source point. Do not hesitate to deploy containment measures for potential releases.

**2. RECOVER FREE FLOATING OIL-** Take measures from preventing oil to impact the shore. This includes mechanical and non mechanical measures approved in accordance with the National Contingency Plan (NCP). Recovering free floating oil that may impact the shore is usually of higher priority than cleaning an area that has already been impacted.

**3. PROTECT SENSITIVE AREAS-** The protection of sensitive areas immediately threatened must commence at the onset of the response. The prioritization of protecting sensitive areas is an operational decision that must be made both through the unified command system and the responders on scene. The response should never be delayed to get a consensus when immediate action is needed. In some cases it may be better to protect a lower priority resource, or even a resource not listed, before a higher priority resource. For example, a high priority resource may have a very low probability of impact for a given spill. Thus, it would not be wise to waste resources protecting it when the resources may be more productive elsewhere.

**4. CLEAN CONTAMINATED SHORES-** In many cases it is better not to conduct cleanup of a contaminated shore until free floating oil that may reimpact the area is recovered. It may be better to determine the best method of shoreline cleanup before workers are allowed in. Before commencing the shoreline cleanup consider your options with the local environmental agencies. Damage may be compounded if areas are cleaned and then reimpacted. Shore areas that require immediate attention include:

a) Areas where resources may be adversely impacted if the oil is not immediately removed. Once the oil has impacted an area the damage may be done and not increase substantially over a short time, other areas, like a turtle nesting beach, may need continual cleaning.

b) Areas where oil may refloat and do further damage down wind should be cleaned and contained immediately. This oil, although it is on the shore may be considered free floating.

### **MAXIMUM MOST PROBABLE DISCHARGE**

The Maximum most probable discharge is calculated as follows:

Considering 10% of the worst case discharge of 2,436.90 barrels (102,350 gallons) is equal to 243.69 barrels (10,235 gallons).

In most spills several response operations will begin at the onset of the response and continue simultaneously. However resource allocation for the **maximum** most probable discharge should follow this priority:

**1. SECURE THE SOURCE-** Reducing the amount of spilled product is the highest priority and the best course of action to reduce impact. Securing the source may involve patching a pipe or tank, closing a valve, building a containment system, removing product from a damaged vessel, transferring cargo to stop product outflow, or perform salvage operations. Contain any spill by deploying boom or constructing dams, in as many layers as necessary around the source point. Do not hesitate to deploy containment measures for potential releases.

**2. RECOVER FREE FLOATING OIL-** Take measures from preventing oil to impact the shore. This includes mechanical and non mechanical measures approved in accordance with the National Contingency Plan (NCP). Recovering free floating oil that may impact the shore is usually of higher priority than cleaning an area that has already been impacted.

**3. PROTECT SENSITIVE AREAS-** The protection of sensitive areas immediately threatened must commence at the onset of the response. The prioritization of protecting sensitive areas is an operational decision that must be made both through the unified command system and the responders on scene. The response should never be delayed to get a consensus when immediate action is needed. In some cases it may be better to protect a lower priority resource, or even a resource not listed, before a higher priority resource. For example, a high priority resource may have a very low probability of impact for a given spill. Thus, it wouldn't be wise to waste resources protecting it when the resources may be more productive elsewhere.

**4. CLEAN CONTAMINATED SHORES-** In many cases it is better not to conduct cleanup of a contaminated shore until free floating oil that may reimpact the area is recovered. It may be better to determine the best method of shoreline cleanup before workers are allowed in. Before commencing the shoreline cleanup consider your options with the local environmental agencies. Damage may be compounded if areas are cleaned and then reimpacted. Shore areas that require immediate attention include:

a) Areas where resources may be adversely impacted if the oil is not immediately removed. Once the oil has impacted an area the damage may be done and not increase substantially over a short time, other areas, like a turtle nesting beach, may need continual cleaning.

b) Areas where oil may refloat and do further damage down wind should be cleaned and contained immediately. This oil, although it is on the shore may be considered free floating.

### **WORST CASE DISCHARGE**

The Worst case discharge is calculated as follows:

Entire cargo 2,436.90 barrels (102,350 gallons).

In most spills several response operations will begin at the onset of the response and continue simultaneously. However resource allocation for the **worst** case discharge should follow this priority:

**1. SECURE THE SOURCE-** Reducing the amount of spilled product is the highest priority and the best course of action to reduce impact. Securing the source may involve patching a pipe or tank, closing a valve, building a containment system, removing product from a damaged vessel, transferring cargo to stop product outflow, or perform salvage operations. Contain any spill by deploying boom or constructing dams, in as many layers as necessary around the source point. Do not hesitate to deploy containment measures for potential releases.

**2. RECOVER FREE FLOATING OIL-** Take measures from preventing oil to impact the shore. This includes mechanical and non mechanical measures approved in accordance with the National Contingency Plan (NCP). Recovering free floating oil that may impact the shore is usually of higher priority than cleaning an area that has already been impacted.

**3. PROTECT SENSITIVE AREAS-** The protection of sensitive areas immediately threatened must commence at the onset of the response. The prioritization of protecting sensitive areas is an operational decision that must be made both through the unified command system and the responders on scene. The response should never be delayed to get a consensus when immediate action is needed. In some cases it may be better to protect a lower priority resource, or even a resource not listed, before a higher priority resource. For example, a high priority resource may have a very low probability of impact for a given spill. Thus, it wouldn't be wise to waste resources protecting it when the resources may be more productive elsewhere.

**4. CLEAN CONTAMINATED SHORES-** In many cases it is better not to conduct cleanup of a contaminated shore until free floating oil that may reimpact the area is recovered. It may be better to determine the best method of shoreline cleanup before workers are allowed in. Before commencing the shoreline cleanup consider your options with the local environmental agencies. Damage may be compounded if areas are cleaned and then reimpacted. Shore areas that require immediate attention include:

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**a)** Areas where resources may be adversely impacted if the oil is not immediately removed. Once the oil has impacted an area the damage may be done and not increase substantially over a short time, other areas, like a turtle nesting beach, may need continual cleaning.

**b)** Areas where oil may refloat and do further damage down wind should be cleaned and contained immediately. This oil, although it is on the shore may be considered free floating.

**Procedures For Facility Personnel To Mitigate Or Prevent Spills Resulting From Operational Activities And The Actions And Responsibilities Of Personnel By Job Title To Be Taken For:**

**Shut Down Operations:**

The Spill Director or Utility whichever is performing transfer operations will shut down the transfer operations by hand closing the discharge valve or shutting down the transfer pumps.

**Manifold Failure:**

Employees will not be involved with the manifold failure incident due to the fact that this is part of the vessel and/or facility, nevertheless they will familiarize themselves with the manifold failure procedures of the receiving vessels and/or facility fuel oil transfer procedures and/or Response Plan.

**Mechanical Loading Arm Failure:**

The Spill Director or Utility whichever is performing transfer operations will shut down the transfer operations by hand closing the discharge valve or shutting down the transfer pumps.

**Hose Failure:**

The Spill Director or Utility whichever is performing transfer operations at the time will immediately stop transfer operations and inform the vessel and/or facility of the situation and commence spill mitigation procedures.

**Other Transfer Equipment:**

The Spill Director or Utility whichever is performing transfer operations at the time will immediately shut down transferring operations and commence to mitigate the situation.

**Tank Overfill:**

The Spill Director or Utility whichever is performing transfer operations at the time will immediately shut down transferring operations and commence spill mitigation procedures. If the overfill is at the receiving vessels side, transfer operations will immediately stop and utilities will stand by while ship mitigates the spill in accordance with their procedures.

**Tank Failure:**

The Spill Director or Utility whichever is performing transfer operations at the time will immediately stop transfer operations and commence evaluation of the situation to determine remedial action. If a rupture is leaking product from a tank and can not be stopped it might be better to continue discharging to the vessel to empty the tank and stop the discharge if the facility so agrees, meanwhile assistance to the facility will be offered for containment and patching procedures.

**Piping Rupture:**

The Spill Director or Utility whichever is performing transfer operations at the time will immediately stop transfer operations and commence evaluation of the situation to determine remedial action. If a damaged pipe is leaking product from a piping rupture and can not be stopped it might be better to continue discharging to the vessel to empty the tank and stop the release, meanwhile containment and patching procedures will be implemented unless the rupture is after a closing valve where the release can be stopped by closing the valve.

**Piping Leak Under Pressure:**

The Spill Director or Utility whichever is performing transfer operations at the time will immediately stop transfer operations and commence evaluation of the situation to determine remedial action. If a rupture is leaking product from a piping rupture and can not be stopped it might be better to continue discharging to the vessel to empty the tank and stop the release, meanwhile containment and patching procedures will be implemented unless the rupture is after a closing valve where the release can be stopped by closing the valve or shutting down the pump.

**Piping Leak Not Under Pressure:**

The Spill Director or Utility whichever is performing transfer operations at the time will immediately stop transfer operations and commence evaluation of the situation to determine remedial action. If a rupture is leaking product from a piping rupture and can not be stopped it might be better to continue discharging to the vessel to empty the tank and stop the release, meanwhile containment and patching procedures will be implemented unless the rupture is after a closing valve where the release can be stopped by closing the valve.

**Explosion And/Or Fire:**

The Spill Director or Utility whichever is performing transfer operations at the time will immediately shut down transfer operations if possible and commence fire fighting procedures as per the Operations Manual if possible. Fire department and Police will be immediately notified.

**Pumping System Failure:**

When pumping systems are utilized, the Spill Director or Utility whichever is performing transfer operations at the time will immediately shut down operations and commence to mitigate any spill or potential threat of a spill.

**Relieve Valve Failure:**

The Spill Director or Utility whichever is performing transfer operations at the time will shut down transfer operations and commence evaluation and correction procedures and mitigate any spill that may occur.

**Other Equipment Failure:**

The Spill Director or Utility whichever is performing transfer operations at the time will immediately shut down transfer operations and commence evaluation, spill mitigation, and correction of the situation.

**List Of Equipment:**

At present the facility maintains in storage and available within one hour of the notification of the spill and of the areas of operations the following response equipment:

- 18" Containment Boom 250 feet
- Sorbent Pads 500
- Absorbent Boom 120 feet
- 3 portable ABC fire extinguishers
- 3 Tyvek Coveralls
- 3 Pairs of Rubber Gloves
- 3 Splash Safety Goggles
- 3 Pairs of Rubber Boots
- 12 pairs leather gloves

## **FACILITY RESPONSE ACTIVITIES:**

### **Personnel Responsibility To Initiate A Response And Supervise Response Resources Pending Arrival Of The Qualified Individual:**

#### **Robin Gonzalez Amador-Spill Director:**

Responsible for the overall cleanup effort and Compliance with the procedures of this plan. Responsible for the filling of the spill form and the contracting of all outside services if necessary. He/She will also be responsible for the follow-up reports to be submitted to the agencies with jurisdiction over the matter. In the event the spill director is not available the Spill Supervisor will assume his duties. Responsible for the hands on and coordination of cleanup effort with the other two employees. In the event the spill supervisor is not available or must assume spill director duties Utility 1 will assume his duties.

#### **Robin Gonzalez Gonzalez-Spill Supervisor:**

Also responsible for the overall cleanup effort and Compliance with the procedures of this plan. In the event the spill director is not available the Spill Supervisor will assume his duties. Responsible for the hands on and coordination of cleanup effort with the other two employees. In the event the spill supervisor is not available or must assume spill director duties Utility 1 will assume his duties.

#### **Utility 1**

Responsible for the coordination, transportation, and commencing the equipment deployment with the assistance of the Spill Director or Spill Supervisor whichever is at the transfer site at the moment. In the event utility 1 is not available or must assume Spill Supervisor duties the remaining personnel not at spill site will assume the responsibilities of transporting and deploying response equipment. *(During this time he will remain with his title of Utility in order to avoid confusion during communications)*

#### **Utility 2**

Responsible for commencing the equipment deployment with the assistance of the Spill Director, Spill Supervisor or Utility 1 whichever is at the transfer site at the moment. In the event utility 1 is not available or must assume Spill Supervisor duties the remaining personnel not at spill site will assume the responsibilities of transporting and deploying response equipment. *(During this time he will remain with his title of Utility in order to avoid confusion during communications)*

The duties of the Spill Director or Utilities are interchangeable with each other depending who is at the transfer site at the time of the incident.

Any of the 3 who is at the transfer site will commence onshore response strategies as described in this plan and filling of the Notification Form contained in section 5 of this plan.

**QUALIFIED INDIVIDUAL AND ALTERNATE QUALIFIED INDIVIDUAL'S  
RESPONSIBILITY AND AUTHORITY: (AS REQUIRED BY 154.1026)**

**Qualified Individual- Robin Gonzalez Amador -Spill Director**

Responsible for the overall cleanup effort and Compliance with the procedures of this plan. He is also authorized to:

1. Activate and engage in contracting with Oil Spill Removal Organizations.
2. Act as a Liaison with the pre-designated Federal On-Scene Coordinator (OSC).
3. Obligate funds required to carry out response activities.

**Alternate Qualified Individual- Robin Gonzalez Gonzalez -Spill Supervisor**

Responsible for the overall cleanup operation and plan implementation. He is also authorized to:

1. Activate and engage in contracting with Oil Spill Removal Organizations.
2. Act as a Liaison with the pre-designated Federal On-Scene Coordinator (OSC).
3. Obligate funds required to carry out response activities.

**Consolidated PIC Listing**

Robin Gonzalez Amador  
Spill Director  
787-553-8555

Robin Gonzalez Gonzalez  
Spill Supervisor  
787-383-3742

Jose Gonzalez Amador  
Alternate Spill Supervisor  
787-453-9555

Jose Sanchez  
Spill Management Team  
787-462-3619

Daniel Martinez  
Spill Management Team  
787-553-5790

Carlos Martinez  
Spill Management Team  
787-314-2189

Manuel Rodriguez Rodriguez  
Spill Management Team  
787-486-5757

Manuel Rodriguez Alicea  
Spill Management Team  
787-374-4313

## ORGANIZATIONAL STRUCTURE

<b>Organizational structure:</b>	Robin Gonzalez Amador Spill Director 787-553-8555  Robin Gonzalez Gonzalez Spill Supervisor 787-383-3742  All PIC's
<b>Command and control:</b>	Robin Gonzalez Amador Spill Director 787-553-8555  Robin Gonzalez Gonzalez Spill Supervisor 787-383-3742  All PIC's
<b>Public information:</b>	Robin Gonzalez Gonzalez Spill Supervisor 787-383-3742
<b>Safety:</b>	Robin Gonzalez Gonzalez Spill Supervisor 787-383-3742
<b>Liaison with government agencies:</b>	Robin Gonzalez Gonzalez Spill Supervisor 787-383-3742
<b>Spill operations:</b>	Robin Gonzalez Gonzalez Spill Supervisor 787-383-3742
<b>Planning:</b>	Robin Gonzalez Gonzalez Spill Supervisor 787-383-3742
<b>Logistic Support:</b>	Robin Gonzalez Amador Spill Director 787-553-8555
<b>Finance:</b>	Robin Gonzalez Amador Spill Director 787-553-8555

## **OIL SPILL REMOVAL ORGANIZATION INFORMATION**

This section must include job descriptions for each spill management team member within the organizational structure described in paragraph (b)(3)(iii) of this section. These job descriptions should include the responsibilities and duties of each spill management team member in a response action.

**Oil Spill Removal Organization Capable Of Responding To The Following Spill Scenarios And Provide Trained Personnel Necessary To Continue Operation Of The Equipment And Staff Of The Oil Spill Removal Organization For The First 7 Days Of The Response:**

**Average most probable discharge:**

*(< 50 bbls or 1% of worst case discharge)*

**Maximum most probable discharge:**

*(<1,200 bbls or 10% of worst case discharge)*

**Worst case discharge to the maximum extent practicable:**

*(Loss of entire cargo)*

**(Oil spill removal organization for each C.O.T.P. zone. (MOBILE FACILITY ONLY)**

**MSRC**

480-991-5599

480-991-5550

**Spill Management Team Capable Of Responding To The Following Spill Scenarios And Provide Trained Personnel Necessary To Continue Operation Of The Equipment And Staff Of The Spill Management Team For The First 7 Days Of The Response:**

**Average most probable discharge:**  
*(< 50 bbls or 1% of worst case discharge)*

**Maximum most probable discharge:**  
*(<1,200 bbls or 10% of worst case discharge)*

**Worst case discharge to the maximum extent practicable:**  
*(Loss of entire cargo)*

**(Spill Management Team For Each C.O.T.P. Zone. (Mobile Facility Only)**

Robin Gonzalez Amador  
Spill Director  
787-553-8555

Robin Gonzalez Gonzalez  
Spill Supervisor  
787-383-3742

Jose Gonzalez Amador  
Alternate Spill Supervisor  
787-453-9555

Jose Sanchez  
Spill Management Team  
787-462-3619

Daniel Martinez  
Spill Management Team  
787-553-5790

Carlos Martinez  
Spill Management Team  
787-314-2189

Manuel Rodriguez Rodriguez  
Spill Management Team  
787-486-5757

Manuel Rodriguez Alicea  
Spill Management Team  
787-374-4313

The Spill Management Team belongs to the facility and no written consent is needed to mention them in the plan. In the event the Spill Management Team can not handle the situation the Oil Spill Removal Organization will be activated, nevertheless the Oil Spill Removal Organization will be put on standby in the event of any size spill or potential threat of a spill

## **SEGREGATION OF INCOMPATIBLE MATERIALS**

Segregation of all materials will be monitored to ensure they are properly segregated to prevent reaction or cross contamination.

The references of the Segregation Table found in Title 49 Code of Federal Regulations (CFR) and the corresponding Hazardous Materials Table, will be referenced for this purpose.

## **DECONTAMINATION OF EMERGENCY EQUIPMENT**

All emergency equipment will be decontaminated in accordance with the contaminated product Material Safety Data Sheet.

Decontamination will be performed on facility equipment whenever the equipment will no longer be used in order to make ready and/or the equipment will be used to contain and/or control other materials that are not compatible with the prior contaminated product.

## **PRIOR RESUMING OF OPERATIONS REPORTING**

The owner or operator will notify the Regional Administrator, and appropriate State and local authorities that in the affected areas of the facility the cleanup operations have been completed and that there is no presence of waste or used oil that may be incompatible with the released material.

That it has been recycled, treated, stored, or disposed of and that cleanup operations have been completed, and that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

## **REGIONAL ADMINISTRATOR REPORTING**

The facility will note in the operating record the time, date and details of any incident that requires implementing the contingency plan.

Within 15 days after the incident, the facility must submit a written report on the incident to the Regional Administrator.

This report will include as a minimum:

Name, address, and telephone number of the owner or operator

Name, address, and telephone number of the facility

Date, time, and type of incident (e.g., fire, explosion)

Name and quantity of material(s) involved

The extent of injuries, if any

An assessment of actual or potential hazards to human health or the environment, where this is applicable

Estimated quantity and disposition of recovered material that resulted from the incident

# **OIL ENERGY SYSTEMS**

**State Road 341 Km 711  
Mayaguez, P.R. 00681**

## **USED OIL ANALYSIS PLAN**

**As per 40 C.F.R. Part 279**

**The present document contains information researched and developed by Regulatory Compliance (RCI) and pertaining to Oil Energy Systems. The information is intended for the use of the individual or entity named above. You are hereby notified that any disclosures, copying, distribution or the taking of any action in reliance on the contents of this information, is strictly prohibited, and action will be enforced under the laws of the Commonwealth of Puerto Rico, unless previous written authorization has been given by Regulatory Compliance.**

**Document ID# 0907150330**

**Developed By:  
Regulatory Compliance  
HC-72 Box 3766 #13  
Naranjito, P.R. 00719-9788  
787-869-7796  
Email [compliance@hughes.net](mailto:compliance@hughes.net)**

ENCLOSURE 7



***Proceso de recogido***

1. Al momento del recogido se toma una muestra del producto
2. El chofer verificara si el aceite esta contaminado o no contaminado, mediante una maquina que detecta cualquier tipo de contaminante con halógenos ó utilizamos el Clor-D-Tect 1000 Chlorine Halogen Test Kit (autorizado por las agencias ambientales reguladoras)
3. Si el producto no esta contaminado procedemos a hacer el recogido del aceite y si esta contaminado no recogemos el producto
4. Solo estamos autorizados a recoger el aceite usado contaminado con agua hasta un 10%, si excede no entraría en el programa de Cesion de Derecho aprobado por ley.



ESTADO LIBRE ASOCIADO DE PUERTO RICO / OFICINA DEL GOBERNADOR

Junta de Calidad Ambiental  
Apartado 11488, Santurce PR 00910

Manifiesto de Transportación de Aceite Usado

Núm. Manifiesto J 12640

3

Generador			Instrucciones		
1. Nombre y Dirección del Generador <i>Mangle Dealers 2616 Ponce by Pass Ponce, PR 00778-0342</i>		2. Número de Identificación <i>AU- 01-58-0750</i>	Copia 1 - Copia de la JCA: enviada por el Destinatario a la JCA Copia 2 - Copia del Generador: enviada por el Destinatario al Generador Copia 3 - Copia del Destinatario Final: la retiene el Destinatario Copia 4 - Copia del Transportador: la retiene el Transportador Copia 5 - Copia de la JCA: enviada por el Generador a la JCA Copia 6 - Copia del Generador: retenida por el Generador  Este documento tiene que acompañar el cargamento de aceite usado. Los encasillados del 1 al 8 tienen que estar llenos al momento de firmar la certificación en el encasillado número 9. La información debe estar legible en todas las copias del formulario. De necesitar ayuda para llenar el formulario, favor de comunicarse con cualquiera de las oficinas de la JCA. Area Metro    Arecibo    Ponce    Mayagüez    Guayama    Humacao 767-8124    880-0013    840-4070    833-1188    864-0103    502-4102		
4. Número de identificación patronal del generador o número de seguro social de individuo. Indicar el nombre de la compañía o persona a la que pertenece el número. Si está cediendo a un procesador el derecho de recibir pagos por acarreo y disposición del aceite usado, deberá indicar el nombre y el número de identificación patronal del mismo.		3. Teléfono <i>812-4000</i>			
Nombre <i>Oil Energy System 660 54 798 8</i>			Destinatario		
5. Descripción a) aceite usado contaminado ** b) aceite usado sin contaminar	6. Tipo de envase* <i>T</i>	7. Volumen total (gal.) <i>312</i>	14. Nombre y Dirección del Destinatario <b>OIL ENERGY SYSTEM, INC</b> PO BOX 711 MAYAGUEZ, PR 00681-0711		15. Número de permiso <b>IP-50-0041-RM</b>
* Bidones ("drones")- B Tanque- T ** Especificar contaminante en el encasillado 22			16. Teléfono <b>787-832-5790</b>		
8. Cantidad en palabras de aceite usado sin contaminar <i>trececienta Docce</i>			17. Certificación del Destinatario: Sujeto a ser procesado criminal y civilmente por declaraciones falsas u omisiones, declaro que la cantidad de aceite usado recibida corresponde a la cantidad descrita en los encasillados de la columna 7 y el encasillado 8. <i>Mayra M Rivera</i> <i>Mayra M Rivera</i> <i>29/4/05</i>		
9. Certificación del Generador: Sujeto a ser procesado criminal y civilmente por declaraciones falsas u omisiones, declaro que la cantidad de aceite usado descrita en los encasillados de la columna 7 y el encasillado 8 es correcta. Además, certifico que el pago por acarreo y disposición debe ser realizado a la entidad indicada en el encasillado 4. <i>Anthony Colina</i> <i>Anthony Colina</i> <i>29/4/05</i>			Nombre en letra de molde    Firma    Fecha (D/M/A)		
Transportador			Estación de Tránsito		
10. Nombre del Transportador <b>OIL ENERGY SYSTEM, INC.</b> PO BOX 711 • MAYAGUEZ, P.R. 00681-0711 Núm. Identificación de la EPA para Aceites Usados PRR - 000008524		11. Número de permiso <b>SR-50-0199-RM</b>	18. Nombre de la Estación de Tránsito		19. Número de permiso
13. Certificación del Transportador: Sujeto a ser procesado criminal y civilmente por declaraciones falsas u omisiones, declaro que la cantidad de aceite usado recogida está descrita correctamente en los encasillados de la columna 7 y el encasillado 8. <i>Daniel Martínez</i> <i>Daniel Martínez</i> <i>29/4/05</i>		12. Teléfono <b>787-832-5790</b>	20. Teléfono		
21. Certificación de la Estación: Sujeto a ser procesado criminal y civilmente por declaraciones falsas u omisiones, declaro que la cantidad de aceite usado recibida corresponde a la cantidad descrita en los encasillados de la columna 7 y el encasillado 8. <i>Pampares Ponce</i>			Nombre en letra de molde    Firma    Fecha (D/M/A)		
22. Discrepancias: Al hacer cualquier corrección, favor de indicar el número y letra (si aplica) del encasillado que se está corrigiendo. Firmar al lado de la corrección.					

# Sanco Laboratories

June 14, 2005

Mrs. Karen Rodríguez  
OIL ENERGY SYSTEM, INC.  
P.O. Box 1256  
Mayaguez, Puerto Rico 00681

## LABORATORY REPORT

Sample Submitted by : Mrs. Rodríguez      06/07/05  
Sample Description : USED OIL  
Sampled by : Client  
Log Number : 05-5274

PARAMETER	METHOD NUMBER	UNIT	RESULT	DATE ANALYZED	ANALYST
Arsenic	7061A	mg/Kg	0.170	06/10/05	RVC
Cadmium	7130	mg/Kg	0.80	06/10/06	RVC
Chromium	7190	mg/Kg	1.00	06/10/05	RVC
Lead	7420	mg/Kg	14.0	06/10/05	RVC
Total Halogen	D-808	% Wt.	0.070	06/13/05	IH
Total Sulfur	D-129	% Wt.	0.463	06/13/05	RVC
Flash Point	D-093	°F	>140	06/13/05	IH
Heating Value	D-240	BTU/Lb.	20,995	06/13/05	IH
Gravity	D-1298	API @ 60°F	33.8	06/13/05	RVC
Water & Sediment	D-1796	% Vol.	Water - <0.05 Sediment -1.0	06/13/05	IH
Ash	D-482	% Wt.	0.750	06/10/05	RVC
Viscosity	D-445/D-2161	SFS	43.37	06/13/05	IH
Vanadium	7910	mg/Kg	<1.0	06/10/05	RVC

\*As per client request, result is reported for water percent only.



January 18, 2011

OIL ENERGY SYSTEM, INC  
 P O Box 711  
 Mayaguez, Puerto Rico 00681

**REPORT OF ANALYSIS**

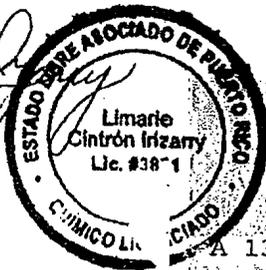
Sample Identification: Aceite Usado January 12, 2011  
 Custody #P-14123 Lab sample 11-0296

TEST	METHOD	RESULTS
Flash Point, F	SW 846 D-93	>230°F
Arsenic, ppm	ASTM D-5708	0.041
Cadmium, ppm	ASTM D-5708	<0.005
Chromium, ppm	ASTM D-5708	0.225
Lead, ppm	ASTM D-5708	0.289
Sulfur, %wt	ASTM D-4294	0.23

PCB's (units ppm)	Result (PPM)
AROCLOR 1016	Not Detected
AROCLOR 1221	Not Detected
AROCLOR 1232	Not Detected
AROCLOR 1242	Not Detected
AROCLOR 1248	Not Detected
AROCLOR 1254	Not Detected
AROCLOR 1260	Not Detected

TOX, ppm	500
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*Limarie Cintron Irizarry*  
 Limarie Cintron Irizarry  
 Licensed Chemist # 3871  
 Laboratory Director



CERTIFIED BY PUERTO RICO DEPARTMENT OF HEALTH FOR DRINKING WATER  
 CERTIFICATION NUMBER PR00947

SABANETAS INDUSTRIAL PARK - PONCE • P.O. BOX 359 • MERCEDITA, PR 00715  
 TELS. (787) 848-6050 • (787) 848-6085 • (787) 848-6265 • FAX (787) 848-6299