

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II
2011 SEP 13 A 11:21
REGIONAL HEARING
CLERK

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

<p>In the matter of</p> <p>Oil Energy System, Inc. P. O. Box 711 Mayagüez, Puerto Rico 00681</p> <p>Respondent.</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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**NOTICE OF APPEARANCE AND MOTION TO REQUEST AN EXTENSION OF
TIME**

TO THE ENVIRONMENTAL PROTECTION AGENCY:

COMES NOW Respondent Oil Energy System, Inc., hereinafter "Respondent" through the undersigned attorney, and very respectfully states, alleges and request as follows:

1. Pursuant to 40 CFR Part 22, Subpart B, §22.10, we hereby give notice that the underwriting attorney is assuming the legal representation of Respondent.
2. In light of the above, we respectfully request that any notice, motion or document that shall be given or served in the present case be forwarded or sent

to the under signer to the following business addresses and electronic mail accounts:

José Javier Lugo Toro, Esq.
PMB 171
400 Calaf Street
San Juan, Puerto Rico 00918
Tel. 787-761-1067
787-761-1310
Fax 787-283-9994
Email: lugotoro@jjlugotoro.com

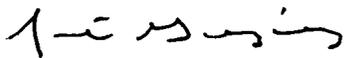
3. On the other hand, counsel for the Respondent was notified on the day the Complaint was received by Respondent.
4. However, we have not been able to gather all the information needed and related to this case in order to provide a responsive pleading to the Complaint.
5. Therefore, we respectfully request an extension of time of no less than forty five (45) days to answer the complaint or otherwise plead; to refute the proposed civil penalty; to demonstrate the Respondent is in compliance with all laws and regulations that concern its operations and therefore no compliance order had or will have to be enforced; and to formally request a hearing pursuant to 40 CFR §22.15(c).

WHEREFORE, Respondent respectfully prays from this Agency to provide as requested and therefore allow the forty five (45) days extension of time.

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 to: Regional Hearing Clerk, U.S. Environmental Protection Agency, Region 2, 290 Broadway- 16th Floor - Room 1631, New York, New York 10007-1866.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 8th day of September 2011.



MR. JOSÉ GONZÁLEZ AMADOR
President
Oil Energy System, Inc.
256 Calle Concordia
Petrowest Plaza 2do Piso
Mayaguez, Puerto Rico 00680
Tel. 787.832.5757



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