

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

IN THE MATTER OF:

Oil Energy System, Inc.
PO Box 711
Mayagüez, PR 00681

RESPONDENT

Docket No. RCRA-02-2011-7107

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II
2012 JUN 18 A 11:15
REGIONAL HEARING
CLERK

COMPLAINANT'S PREHEARING EXCHANGE

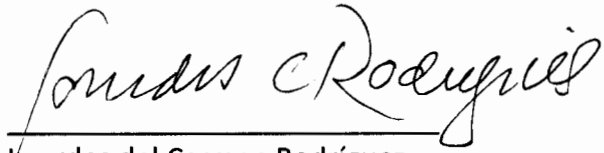
TO THE HONORABLE COURT:

Pursuant to the request made by Hon. M. Lisa Buschmann, Administrative Law Judge, on the Prehearing Order dated February 29, 2012 the Complainant in the above captioned matter hereby files Complainant's Rebuttal Prehearing Exchange:

- 2. Copies of all documents and exhibits intended to be introduced into evidence at the hearing. Included among the documents produced shall be a curriculum vitae or resume for each identified expert witness, The documents and exhibits shall be identified as Complainant's or Respondent's exhibit as appropriate, and numbered with Arabic numerals (e.g., CX 1 or RX 1). The copies may be printed double-sided.**

Complainant hereby is enclosing as **CX-4**, a document titled "Log Notes of RCRA CEI at Petro West-Mayaguez, Oil Energy Systems" dated February 2, 2010 and generated by Angel E. Salgado, Environmental Scientist.

Respectfully submitted in Guaynabo, Puerto Rico, this 15th day of June 2012.



Lourdes del Carmen Rodríguez
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U.S. Environmental Protection Agency, Region 2
Office of Regional Counsel, Caribbean Team
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CERTIFICATE OF SERVICE

I certify that I have this day caused to be sent the foregoing Complainant's Rebuttal Prehearing Exchange, dated June 15th, 2012, and bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and copy, **UPS** to:

Karen Maples
Regional Hearing Clerk
Region 2
U.S. Environmental Protection Agency
290 Broadway, 16th Floor
New York, NY 10007-1866.

Copy by certified mail, and by electronic e-mail to:

Attorney for Respondent:
Jose Javier Lugo Toro, Esq.
PMB 171
400 Calaf Street
San Juan, PR 00918
lugotoro@jjlugotoro.com

Copy by **UPS** to:

Administrative Law Judge:

The Honorable M. Lisa Buschmann

Office of Administrative Law Judges

U.S. Environmental Protection Agency

Franklin Court Building

1099 14th Street, N.W., Suite 350

Washington, D.C. 20005

[Phone: (202) 564-6262 Att: Knolyn Jones, Legal Staff Assistant]

6/15/12

Date

Allen Day

CX-4

Rodriguez/lee petrowest pr.net

Petroleum - Petroleum
Texas/Chromen -
Pump - Control

RCRA CEI at
Petro West Mayaguez
Oil Energy Systems

2-2-10

PRD980533103

PRR-5524 - Generator num

Arrived at the facility by 8:45 am. Met with Karen Rodriguez
+ Mr. Robin Gonzalez, Operations Manager.

Home 832-5757

834-0555 (Oil Energy Systems)

Postal/Phone PO Box 711

Mayaguez 00681 } Oil Energy Systems

Physical Address Concordia # 256

Millicon,

Mayaguez 00680

Petro West President: Mr. Robin Gonzalez

Petro West
PO Box 1256
Mayaguez 00681

Oil Energy System President: Mr. Jose Gonzalez

Petro West Dist. Combustibles + transportation.

Oil Energy System - Recycle, ^{intermediate} - heavy acute waste - 10 years

Plant Operations that potentially generate HLU:
Petro West: Mechanics shop

Oil Energy System:

7,100,000 gallons

After an initial briefing and general facility information gathering, EPA went on to tour the facility. Mr. Edwin Martinez showed us around the plant and guided EPA inspectors through the oil-recycling process.

(299)

Picture 1 - wide view of the oil Energy Systems' product (oil) receiving area - the oil-screening tank can be seen in the background.

Picture 2 - View of oil screening tank where used oil is poured from tank trucks.

Picture 3 - close view of oil screening tank showing 3 three (3) compartments.

Picture 4 - View of manifold that collects used oil from tank trucks and pumps to tank #3.

Picture 5 - wide view of drum storage area showing 55 55-gallon drums. Several of the drums had contents but most were empty. Some of the tanks were labeled "acetic waste".

Picture 6 - View of stainless steel tank used for heating the oil to enhance oil-water separation.

Picture 7 - View of First Station of water.

Picture 8/10 - Views of two (2) 55 gallon drums of detergent.

Picture 9 - View of ^{reverse} ~~forward~~ osmosis system and membrane (horizontal) filters, part of the water.

Picture 11 - Flocculation tank from the first WWTP station.

Picture 12 - pH adjustment tank - final phase of WWTP.

Picture 13 - Inside view of an unlabeled 55-gallon drum used for regular truck and oil-soaked absorbent materials. Label indicated 116.

Picture 14 - Oil filter from manifold to oil tank.

Picture 15 - Wide view of entrance ^{to ESS} to plant showing the truck-trucks unloading area.

Picture 16 - Wide view of the trucks maintenance area/shop.

Picture 17 - Closer view of trucks maintenance shop. Only tires + brakes replacement activities are conducted here, also some soldering work is done here.

Picture 18 - View of two (2) metal containers (open) with paint brushes + residues of spent paint + oil.

Picture 19 - Centrifuge equipment used for separating sorted oil.

For the plants (UES) tour, inspectors went back to the office to review the paperwork - manifests, lab results. EPA inspected the manifests & lab results for 2008 & 2009. Inspectors had an exit meeting with the PetroWest president, Mr. Robert Gonzalez, and Mrs. Karen Rodriguez, comptroller. EPA left the facility around 2:00 pm; returned to CEPD by 5:30 pm.

2-3-10

SP-9 submitted form ST-71 thru workplace to Carol for approval on 2-4-10. per

2-4-10

Revised the Heritage R 2001-2003 risk data comparison received at CEPD.

Attended the allhands meeting with R.A. Judith Enck at CEPD - 9:00 am

Handed 14 blue printed diagrams extracted from the Hilly del Canice Mayaguez, 2001 RCRA Permit Application to Delays for reproduction by an outside vendor. The blueprints reproduction is part of the FOIA request related to Heritage R Mayaguez by Mayaguez Neos.