

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

JAN 1 6 2014

The Honorable Laura Velez Velez Chairperson Puerto Rico Environmental Quality Board 1372 Ponce De Leon Ave. San Juan, Puerto Rico 00926

Dear Chairperson Velez Velez:

EPA has an ongoing program of conducting periodic evaluations of the Clean Air Act title V permitting programs. As we discussed on our October 31, 2013 quarterly conference call, EPA Region 2 staff conducted a review of Puerto Rico's title V program on August 22, 2013. EPA previously evaluated Puerto Rico's program in September 2004 and May 2009. The focus of this year's evaluation was to assess Puerto Rico's progress in implementing the program and in resolving deficiencies that were identified in the May 2009 title V program review.

Enclosed are EPA's detailed findings and results of the August 22, 2013 program evaluation. To summarize our findings, Puerto Rico has made good progress in resolving some of the previous deficiencies, however some issues still remain. Progress made on previous deficiencies includes the following:

- Providing a "Statement of Basis" with every title V permit
- · Providing the necessary training to EQB staff
- Tracking and reviewing compliance certifications and conducting inspections
- · Collecting permit fees in a timely manner, and
- Maintaining the web site to provide permit related information to the public.

Even with these program improvements, EPA has serious concerns with the continuing low rate of permit issuance. While Puerto Rico has issued six initial title V permits in the last four years, overall the initial permits for eleven sources were not issued in a timely manner. In addition, many permits are due for renewal and the permit renewal process contains similar delays with issuing permits. These continued delays warrant your immediate attention. As discussed in the enclosed findings, EPA's evaluation concluded that there is a surplus of funds within Puerto Rico's title V program. EPA recommends that this surplus be used directly to support the title V program by either hiring or reassigning additional staff or hiring a contractor to assist in the permitting activities.

We would also like to bring to your attention that historically the Puerto Rico Small Business Program was a huge success of the title V program, providing a helpful resource to small businesses. However, it appears that in recent years the program has not been supported with the necessary staff and funding to continue that success. As a result of EPA's review, we found that Puerto Rico's Small Business Program has not reported any compliance assistance related activity since 2010.

The next step in the title V program evaluation process is for the EQB to submit an action plan within the next 60 days, along with a schedule on how EQB plans to address the program deficiencies and, most importantly, the low title V permit issuance problem in the Air Quality Area. I urge you to take the necessary steps to follow up on EQB's action plan and ensure that the title V permits are issued in a timely manner. Should you have any questions or wish to discuss these issues, please call me at (212) 637-5000 or have your staff contact Mr. Richard Ruvo, Chief of our Air Programs Branch, at (212) 637-4014.

Sincerely,

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Judith A. Enck Regional Administrator

Enclosure

cc: Luis Sierra, Environmental Quality Board Leimarys Delgado, Environmental Quality Board

The Environmental Protection Agency's Evaluation of the Puerto Rico Environmental Quality Board's (EQB) Title V Program

Date of Audit: August 22, 2013

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Outline

- I. Introduction
- II. Summary of Findings
- III. Review Considerations
- IV. Evaluation of EQB's Title V Program
- V. Recommendations
- VI. Attachments
 - A. Meeting Agenda/Participants
 - B. Fee and Finance Documents

Puerto Rico Environmental Quality Board (EQB)

Title V Program Evaluation- August 22, 2013

I. Introduction

Pursuant to EPA's oversight responsibilities, EPA has an ongoing program of conducting periodic evaluations of the Clean Air Act title V permitting programs. As part of this program, EPA Region 2 staff conducted a program review of Puerto Rico's federally approved title V program. In August 2013, EPA Region 2 staff evaluated air permitting and enforcement files, and interviewed EQB's Air Quality Area management and staff. The focus of this year's evaluation was to assess Puerto Rico's progress in implementing the program and in resolving deficiencies that were identified in the May 2009 review. Based on the discussions and review of the permit files, EPA evaluated the progress the EQB is making in implementing the title V program and addressing the deficiencies. EPA notes that as of this evaluation, Puerto Rico's title V program covers 48 sources of which 17 sources have not been issued initial title V permitts. One of these 17 sources has applied for a synthetic minor permit to avoid the title V permitting requirements. All those sources seeking initial or renewal permits have submitted their applications more than 18 months ago and in many cases years ago.

II. Summary of Finding

Overview-

In addition to reviewing the program's progress, the Region's review also included whether Puerto Rico is complying with the 40 C.F.R. Part 70 requirements and title V of the federal Clean Air Act ("the Act") with respect to administration and enforcement of Puerto Rico's approved title V program, or if not, is taking corrective action to do so. The Region reviewed and evaluated Puerto Rico's administration and enforcement of the program against the requirements of 40 C.F.R. Part 70. The details of that review are included in this report. EPA's review is based on EQB's responses to the program/fee evaluation questionnaires, management/staff interviews, review of files and an examination of supporting documents. As part of this evaluation EQB provided information related to its source files, permits and the financial records.

The following is Region 2's analyses of the Puerto Rico's current title V program:

Addressing Past Permit Deficiency

Puerto Rico now prepares and issues a Statement of Basis when issuing a draft title V permit, which explains the permit and the permit's general requirements. This was a deficiency EPA brought to the attention of Puerto Rico in previous evaluations.

Continued Implementation

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1) Air Quality Area: The EQB's air program's permitting engineers have developed further expertise in the area of permitting requirements and in addressing applicants' concerns. EQB has provided ample training opportunities over the years, including permit writing training provided by the California Air Resources Board staff.

2) Permit Enforcement: The EQB enforcement staff tracks and reviews every annual compliance certification, deviation and semi-annual report. Further, EQB conducts a full compliance inspection of every permitted facility every other year.

3) Fee Collection: The EQB ensures that appropriate fees are collected from every title V facility in a timely fashion. Currently, this program carries a \$ 4 million surplus.

4) Public Outreach- EQB maintains a web site on which it provides permits and other permit related information in Spanish and English.

Areas of Serious Concern

1) Permit Issuance Rate: As of the date of this review, EQB has issued a total of 31 final title V permits out of 48 permit applications. EPA granted full approval to the Puerto Rico' Operating Permit Program on February 26, 1996 and the Clean Air Act requires that all permits be issued within three years of such an approval. Puerto Rico's initial 70 source title V universe is now reduced because of shutdowns and sources becoming minor. EPA expressed concern in its 2004 and 2009 reviews that EQB's permit issuance rate was low. In spite of EQB's past commitments, EPA notes that EQB finalized only 6 permits in the last four years. It should be noted that after the program evaluation in 2009, the EQB committed to issue all the remaining initial permits by July 2010. However, it failed to meet its commitment.

2) Small Business Program: The Small Business Program did not report any activity for the last four years. This program was active and a successful program in the last decade but it appears that Puerto Rico does not give any priority to this program now.

III. Review Consideration

This program review focused on two questions:

1) Is Puerto Rico administering its permitting program consistent with the requirements of 40 C.F.R. Part 70?

2) Is Puerto Rico adequately enforcing its permitting program consistent with the requirements of 40 C.F.R. Part 70?

It is Region 2's intent to assist Puerto Rico identify problems in administering the title V program and to resolve them in a timely way. Ultimately, however, if Puerto Rico

cannot administer or enforce its permitting program consistent with the requirements of 40 C.F.R. Part 70, EPA may have to exercise its authority to withdraw Puerto Rico's program approval in whole or in part.

The process for withdrawing the program would be for EPA to publish a Notice of Deficiency in the Federal Register, notifying Puerto Rico of the determination and the corrective actions required. Puerto Rico would have to correct the deficiency within eighteen (18) months or face the imposition of sanctions in accordance with section 502(i)(2) of the Act, 42 U.S.C. § 7661a(i)(2). If Puerto Rico is unable to correct the deficiencies within two years, EPA must withdraw the program approval and then promulgate a federal operating permits program pursuant to Section 502(i)(4) of the Clean Air Act within two years. Under this option EPA would issue title V permits and enforce the title V program. Again it is not the Region's goal to implement this program in Puerto Rico but rather to ensure that the EQB issues permits that meet all Puerto Rico and Federal requirements as expeditiously as possible and also enforces these permits.

IV. Evaluation of Puerto Rico's Title V Program

On August 22, 2013, the staff from the Clean Air and Sustainability Division and the Caribbean Environmental Protection Division conducted a phone and an onsite review of Puerto Rico's title V air permitting program. During the onsite visit, regional staff reviewed permitting documents and files, including public notices, emission statements and fee receipts. The Region sent the agenda topics for the title V program review in advance to the EQB.

PREQB- Organization-Air Quality Area

The Air Quality Area is part of Puerto Rico's Environmental Quality Board. The air related issues are handled by Air Quality Area's Permitting, Air Toxics and Enforcement Divisions. The Permitting Division currently has six full time permit writers and they are responsible for minor and major source permitting. In the years 2010 to 2012, the Division had effectively 4 permit writers. The Air Quality Area's Director reports to the Environmental Quality Board. The Air Quality Area Director has estimated that 10 full time permit writers are needed for the title V program.

Puerto Rico title V Permitting Status

The Region evaluated EQB's permitting status and expertise in evaluating title V air permit applications by reviewing information regarding the number of sources permitted, those which still need initial title V permits and the training activities initiated to ensure sufficient staff expertise. The Region's review relied on information from Puerto Rico's re-evaluation report, air permit chart, semi-annual input to EPA's title V Operating Permits System data base and discussions with staff. Based on this information, EPA concludes that the PREQB continues to have a serious backlog in issuance of initial and renewal title V permits.

Puerto Rico began this program with a potential title V permit universe consisting of 50-60 sources. The EQB subsequently eliminated some sources because they had either shut down or obtained synthetic minor status. As of this evaluation, Puerto Rico reported a total of 48 title V sources, of which 17 sources still are waiting for an action on their title V applications. All these 17 title V applications are more than 18 months old. In the last four years, that is, after the last program evaluations, Puerto Rico issued 6 initial title V permits and 4 renewal permits. During the evaluation, EPA learned that the delay in the issuance of initial permits was caused due to having the lower number of permit writers and having the permit writers' efforts tied up in working on other priorities such as waivers and minor permit issuance and revisions. Puerto Rico also informed EPA that the sources do not update their applications on time and fail to provide additional information that the permit writers seek from the sources. The Air Quality Area's proposal to hire a contractor for permitting assistance was also not approved by the Budget Office. It was further reported that the delay in permit issuance was also caused by other priorities in issuing permits for the energy related projects and internal difficulties in developing air toxics related permit conditions. The Permitting Chief was also given additional responsibilities of other rule and SIP development for Puerto Rico's air program.

PREQB title V Staff

The title V program is implemented by the Permitting Division within the Air Quality Area. It also handles, as stated above, minor source permitting related activities for these title V permittees. This Division is headed by the Chief who oversees 6 permanent staff members in the San Juan Office. There is an attorney who assists in permitting matters. EQB has provided a comprehensive permit writing training to all the staff members. This training was provided by the permit writers from the California Air Resources Board and via various EPA webinars. EQB also provided training in the areas of air pollution related activities for the pharmaceutical industry, refineries, power plants, landfills etc. The staff has good knowledge of the Clean Air Act requirements and has now developed an expertise in writing title V permits that should minimize the issues that the permittees had with the earlier permits.

Puerto Rico title V Enforcement

As part of EPA's oversight of Puerto Rico's approved title V program, Region 2 also evaluated the EQB's title V enforcement program. The EQB informed us that it conducts a bi-annual full compliance inspection of every title V source. It also reviews every annual compliance certification and malfunction report. The EQB also tracks the submission of the annual compliance certification and follows up with a source that does not submit a timely report. EPA reviewed the files of AES, CEMEX, GE, Tradewind and SJ Landfill facilities. All the files were well organized and complete. Further all the files contained annual compliance certifications and inspection reports. In general, all these sources reported that they are in compliance.

Puerto Rico title V Fees/Expenses

The Federal requirements regarding title V fee adequacy are found in 40 C.F.R. Part 70 section 70.9. The provisions in Part 70 require that the state program require Part 70 sources to pay a fee sufficient to cover the permit program costs (direct and indirect). Further, states can only use title V fee revenues for title V program costs. The purpose of this evaluation was to verify that there were procedures still in place to receive these fees, keep them separate from other funds, disburse the fees for valid expenses, and to provide adequate fiscal oversight of Puerto Rico's title V funds. EPA Region 2's Air Program conducted a preliminary review of the Puerto Rico's title V fee structure to find out if there is any change since the 2009 evaluation. The one major point to note is that the fee structure has not changed i.e., the fee remains at \$37 per ton since 2003. The 2012-2013 federal presumptive permitting fee is \$ 46.73 per ton. EPA Region 2 was able to verify that title V fees are being calculated in accordance with the Puerto Rico title V fee regulation. The EOB maintains facility specific invoices, receipts, the amount billed and the amount collected information for accountability. The Air Quality Area sends a list of facilities with their permit number, actual emissions in tons and the amount of fee to be invoiced to the Finance Division. The Finance Division then sends an invoice to every source asking to pay the amount billed. Generally, all the facilities pay the fees due on time. The EQB provided Accounts Receivable/Expenditure summary for the fiscal years FY 2009, 2010, 2011 and 2012. Currently, this summary indicates that the PREQB carries a \$4 million surplus in its title V account, however, the Air Quality Area reported that the title V revenue becomes part of the general State revenue. Further, based on the discussions during this evaluation, it appears that the title V revenue is made part of the general budget and that the communication between the Air Quality Area and the Finance Division as it relates to the revenue and expenses for the title V program needs to be improved because they do not share the details of fee timing and expense allocation on a routine basis.

Puerto Rico Small Business Program

The CAA section 507 requires that a State provide compliance assistance to small businesses. In the past, Puerto Rico actively implemented compliance assistance activities under the title V program. However, it was reported that the Small Business Program ceased to be a priority in the last few years and currently there is no employee working for this program. There was also no activity reported under this program.

V. Recommendations

EPA's first recommendation is that the management of EQB needs to prepare an Action plan for issuing the remaining initial permits and begin issuing the renewal permits with a commitment to a realistic date for their completion and with provisions for accountability and for addressing those factors which have caused delays and problems to date. The title V program's surplus funds be used directly to support the title V program by either hiring or reassigning additional staff or hiring a contractor to assist in permitting activities.

EPA asks that the EQB carry out its title V related finances pursuant to the requirements of the CAA. The CAA requires that title V revenues and expenses be kept in a separate account and not be comingled with other State revenues and that the title V revenue be used only for the implementation of the title V program. However, it appears, based on the conversation with the EQB staff, that the title V funds are made part of the general budget. EPA also notes that the title V program seems to carry a surplus of about \$4 million. EPA, therefore, recommends that an internal financial audit be conducted and that the steps be taken to maintain the title V account pursuant to the Clean Air Act.

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EPA further recommends that all necessary activities for the Small Business Program be reinstituted because the law requires that the small business assistance be provided on a regular basis under the title V program.

AGENDA

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Puerto Rico Title V Program Evaluation August, 22 -2013- NY Office via Conference Call/CEPD @ EQB Office

9:30-10	Introduction- 2009 Audit Summary
10-12	2009/2013- Permit Issuance Rate/Renewals/Certifications/Staff/Issues
1.30-2.30	EQB Title V Finance-Q/A-fees/expenses/Small Business
2.30-3.00	Permit and File Reviews- CEPD EPA

We will prepare questions that we will discuss during this audit – we will send the list to EQB in advance. Similarly, EQB should send us a list of any questions that it may have for EPA.

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PR Title V Audst-// 8/22/2013

ASISTENCIA REUNIÓN AUDITORIA TITULO V 22 DE AGOSTO DE 2013

	NOMBRE	FIRMA	REPRESENTA	TELÉFONO	· CORRE ELECTRÓNICO
1	Leimarys Delgado	Hermanplefol	JEA	787-767-5181 Ext- 3270	kimoryscholgado & jea.gobierne pe
2	John Aporte		USEPA	787-977-5853	aroute phale epa-sor
3	Marina Castro	M. Catro	US EPA	212-637- 3713	casto, marina @ epa . Jiv
4	Curs R. Seria	Au	JCA	257-767-8101	hussing agoa. sobiens. pr
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Edificio de Agencias Ambientales Cruz A. Matos Carretera Estatal 8838, Sector el Cinco, Rio Piedras, PR 00926 PO Box 11488, Santurce, PR 00910 Tel. 787-767-8181, Fax 787-767-4861 www.jca.gobierno.pr



Commonwealth of Puerto Rico Office of the Governor Environmental Quality Board Finance Division Title V Income and Expense Summary

Fiscal Year	Income	Expenses	Change	Balance	
1995-1996	\$ 741,696.82	\$ 378,204.49	\$ 363,492.33	\$ 363,492.33	
1996-1997	2,848,184.99	1,268,586.34	\$ 1,579,598.65	1,943,090.98	
1997-1998	2,494,207.59	1,589,665.99	\$ 904,541.60	2,847,632.58	
1998-1999	2,222,261.32	179,963.35	\$ 2,042,297.97	4,889,930.55	
1999-2000	2,397,358.70	2,383,910.26	\$ 13,448.44	4,903,378.99	
2000-2001	2,250,622.47	2,545,263.83	\$ (294,641.36)	4,608,737.63	
2001-2002	1,768,988.98	2,145,982.17	\$ (376,993.19)	4,231,744.44	
2002-2003	1,942,062.35	2,584,967.07	\$ (642,904.72)	3,588,839.72	
2003-2004	1,927,843.95	2,520,569.51	\$ (592,725.56)	2,996,114.16	
2004-2005	1,848,593.58	1,389,227.36	\$ 459,366.22	3,455,480.38	
2005-2006	1,808,055.51	1,868,024.69	\$ (59,969.18)	3,395,511.20	
2006-2007	2,350,157.50	1,433,822.65	\$ 916,334.85	4,311,846.05	
2007-2008	2,478,805.35	2,736,553.46	\$ (257,748.11)	4,054,097.94	
2008-2009	2,486,064.07	2,312,787.57	\$ 173,276.50	4,227,374.44	
2009-2010	2,077,348.53	2,485,917.15	\$ (408,568.62)	3,818,805.82	
2010-2011	1,876,444.60	1,722,437.95	\$ 154,006.65	3,972,812.47	
2011-2012	1,856,681.97	1,533,407.33	\$ 323,274.64	4,296,087.11	
Totals	\$ 35,375,378.28	\$ 31,079,291,17	NET ADJU HIT OF AN	\$ 4,296,087.11	

Expense Reconciliation Report Title V FY2012

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Exhibit 6

Commonwealth of Puerto Rico Office of the Governor Environmental Quality Board Finance Division Reviewed Title V Balance Reconciliation For The Period of July 1, 2011 to June 30, 2012 BALANCE AS PER BOOKS

Balance in GL-015 as of June 30, 2012 Add:				\$	1,765,774.56
Encumbrances as of June 30, 2012 in GL015		Exhibit 1	37,716.98		
Pre-Encumbrances as of June 30, 2012 in GL015		Exhibit 1	5,034.50		42,751.48
Cash Available in fund 226-014-782-1998				\$	1,808,526.04
Add:					
Account Receivable as of June 30, 2012		Exhibit 2	1,662,494.16		
Invoice collected in FY 2012 and registered in FY 2013		Exhibit 2	192,798.18		
Other Income for FY 2012 and registered in FY 2013		Exhibit 3	1,252.30	_	1,856,544.64
SUBTOTAL				\$	3,665,070.68
Less:					
Payroll and other expenses for FY 2012 registered in FY 2013		Exhibit 4		\$	(64,530.23)
Adjusted fund balance in GL-015 as of June 30, 2012				\$	3,600,540.45
Balance as per Revenue and Expenses Title V as of June 30, 2012		Exhibit 6		\$	4,296,087.11
Payroll for FY 1998-1999 not considered and reviewed by PKF				_	(980,664.15)
Adjusted Fund Balance as per Revenue and Expenses Title V as of					
June 30, 2012				\$	3,315,422.96
Difference between GL-015 and Revenues and Expenses				\$	285,117.49
Balance Breakdown					
Cash Balance	\$	1,808,526.04			
Income Collected	14	192,798.18			
Account Receivable		1,662,494.16			
Other Income Registered in 2012		1,252.30			
Payroll Registered in 2012		(64,530.23)			
	\$	3,600,540.45			
Difference	\$	(285,117.49)			
	\$	3,315,422.96			

Commonwealth of Puerto Rico Office of the Governor Environmental Quality Board / Finance Division Title V. Income Invoice For The Period of July 1, 2011 to June 30, 2012

DATE	POSTED GL015 FIMAS	DESCRIPTION	INVOICE NUMBER	VOUCHER NUM	DEPOSIT ID	RECEIPT	AMOUNT	ANOUNT	PAID BEFORE 6/30/2012 RECOGNIZED IN FY 2013	AMOUNT DUE	PAID AFTER \$30-2012	AMOUNT DUE	OVER / UNDER PATMENT
- No Charles		TO PAPER CARRIENCES IN DESIGNATION OF				42251	1.871.68	1.878.68	1,878.68				
5/18/2012		BUCKEYE CARIBUGAN TERMINALS, INC				and the second se	390.71	290.71					
\$/1/7017		CARIBE GEINDUSTRIAL OF PRILLE				41833		790.71	290.71				
		COMMENCIAL INCINERATOR					185.74	1 201 21	-	185.74	1,201 51	185.74	
9/13/2012		CROWN BEVERAGE PACKAGING PR				40858	3,196 #4	11 586 61	11,586.61	3,201.51	1,201 51		507
5/23/2017		OESTILERIA SERRALLES	S			42003	the state of the s		and the standard statements				
A REAL PROPERTY.		-GNWALL INTERNATIONAL				42004/62306/42771	3,196.44	1,434.62	1,434.02	1,762.42		1,767.42	(1.762.42)
4/9/2012		PETALESS OIL & CHENT				41624	7,973.32	7,973.32		A1 111 A1	AL 243 M	the local day in the local day is a second day in the local day is a second da	-
7/18/2012		ABBOT LABORATOR ESP. R	014-00000587			425#8	\$7,241.93	91,663.80		91,663.80	91,663,80		4,421,87
6/14/2012		ALS FUERTO RICC, UP	014-00000581			42198	92,417.49	\$2,417.49	92,417 45				-
		API INDUSTRIES PUERTO RICO (TAPI)	014-00000592				309,76		-	309.76		309.76	
6/1/2012	-	BACARDI CORP	014-00000593			42077	14,003,16	14,603.16	14,601.16				
5/30/2017		BRISTOL MYERS SQUIRE COMPANY	014-00000594			42045	1,099-27	1,098.27	1,099.27				
9/11/2012		CEMEX PUEATO RICO INC.	014-2000595M			42970	39,760.42	39,760.42		39,760.42	39,760.42		
6/14/2012	-	CERVECERIA INDIA	014-00000556			42202	2,945.05	2,545.05	2,945.05				
5/24/2012		CORCO	014-00000597			#2023	3,168.11	3,188.15	3,188.11				
		CROWN BEVERAGE FACKAGING PR	014-00000598				6,279.30			6,279.30		6,279.30	
6/18/2052		ECO ELECTRICA	014-00000599			42253	18,486.54	18,485.54					1.4
9/12/2012		HIMA MEDICAL CLINIC	014-00000600			40849	745.55	745.55		745.55	745.55		
5/8/2012		LILLY DEL CARINE, INC	014-00000601			4188)	7,795.90	7,795.90	7,795.90	-			
(7A/2012		HENTAGE ENVIRONMENTAL SERVICE (LILLY DEL CARIBE MAVAGUEZ)	014-00000602			42356	62.90	62.90	62.90	_			
L/20/2012		MONON, HEALTHEARE LLC	014-00000603			42275	3,150.18	3,150.18	3,150.18				
5/17/2011	Statistics of	MERCE SHARP & DOHME	014-00000604		(a)	41964	1,512.56	2,717.65	2,717.65			110 - Contra 1	1,205.09
1/11/2012		APP PHARMACEUTICALS LLG	014-00000605			40853	469.24	470.27		470.27	470.17		1.09
1/20/2012	6	PREPA CAMBALACHE	014-00000666			42613	11,045,08	11,045.98		11.045.98	11,0#5 98	Sector Sector	1000-001
1/20/2012		PREPA	014-00000607			42614	750,000.00	750,000.00		750,000.00	750.000.00		
1000		PREPA	014-00000607		1.10	No. of the second second second	750,000.00			750,000.00	A Distance in the second	752.000.00	100 C
6/14/2012		SARTORIUS, INC	014-00000608		1	42215	1.643.02	1,643.02	1,643.02		1893 Barris		
5/22/2012	- 11/2 - 1	SCHERING PLOUGH PRODUCTS	014-00000609			41990	\$61.86	361.85	361.86				4
	Stores -	SHELL CHEMICAL YABUCDA INC [LLC]	014-00000610				1,878.68		1	1,878.68		1,#78.68	1.1.1.1.1.1.1.1.1
1/31/7012		SAFETEER COMP	014-00000611		5481	41154	137.33	137.33					
5/22/2613		TRADEWINDS FOODS	014-00000612	1.00	100 C	41987	1,272.48	1,272,48	1,272.48			1	
6/5/2011		ALLIED WASTE OF PONCE, INC.	014 00000613			42123	2,399.82	2,399.82	2,399.82				2.4
1/23/2017	1.	VERTEDERO DE HUMACAO	014-00000616	Sec. 1	-	42017	4,107 37	4,107.37	4,107.37		2-1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	(10	
5/23/2012		VERTEDERO DE ARECIBO	014-00000615			42018	1,017.27	1,017.27	1,017.27			1	
5/22/2017		VERTIDERD OF CAROLINA	014-00000616			42016	1,068.92	1,068.92	1.068.92			S	
5/23/2012	2-12-C	VERTEDERO DE GUAYNABO	014-00000617		1	42015	1,719.99	1,719.99	1,719.99		1.12 11-12	6	
/28/2012		VERTEDEND OF SAN IUAN	014-00000618		5	42017	£1 01a	610.13	610.13				
5/23/2017	4	VERTEDERO DE TOA ALTA	014-00000619		-	42013	1.378.07	1,373.07	1,373.07			2-11-1-1	
6/1/2012		HOLSUM DE PRINC	014-00000620			42073	6.774.70	6,774.70	6,274.70				100
1-1-1		NAVAL ACTIVITY FUERTO RICO	014-00000621		Y 5 844		5,190.73		100 C	5,190.73	and the second	6,190.73	· · · · · ·
		VENTEDERO DE FAJAKOU (LANOFILL TECHNOLOGIES CORP	014-00000622			42014		B19.96	\$19.96				
5/23/2912		Nume:	018/00/00022			1011	n19.10	#19.90	913.30			-	
			- million				1,849,796.61	1,089,823.04	192,798.18	1,662,494.16	896,887.53	765,606.63	3,870.64

Expense Reconciliation Report Title V FY2012

Exhibit 2

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Commonwealth of Puerto Rico Office of the Governor Environmental Quality Board Finance Division Title V Expense For Fiscal Year 2011 For The Period of July 1, 2011 to June 30, 2012

Account Description	Expense Object	Amount of Expenses as of 6/30/11	Accumulation of Expenses FY 2010	Accumulation of Expenses FY 2011	Adjusted Balance as of 6/30/11	
					\$ -	
					s –	
Salaries · Regular Employees	E1110	1,179,361.64	\$ 48,647.95	\$ 48,776.42	\$ 1,179,490.11	
Employee Insurance - Workman Compensation	E2810	42,800.55	\$ 1,765.56	\$ 1,768.26	\$ 42,803.25	
Employee Insurance - Hospital and Medical Attention	E2870	39,000.00	\$ 3,250.00	\$ 3,375.00	\$ 39,125.00	
Federal Social Security Contribution	E6410	88,786.72	\$ 3,638.26	\$ 10,610 55	\$ 95,759.01	
Contribution to State Government Pension Fund	E6610	115,491.17	\$ 4,425.88		\$ 111,065.29	
Privatized Services - Payment for Services	E1294	6,120.75			\$ 6,120.75	
Contracted Auto Equipment Maintenance & Repair	E2772	24,257.28			\$ 24,257.28	
Contracted Other Equipment Maintenance & Repair	E2780	11,895.00			\$ 11,895.00	
Public Officers & Employee Training	E2960	4,210.00			\$ 4,210.00	
Air Travel in State of Puerto Rico	E2310	372.00	\$ 90.00		\$ 282.00	
Allowances Expenses in State of Puerto Rico	E2320	3,705.20			\$ 3,705.20	
Air Travel out of State of Puerto Rico	E2330	3,079.60	\$ 1,205.20		\$ 1,874.40	
Allowances Expenses out State of Puerto Rico	E2340	1,270.00	\$ 410.00		\$ 860.00	
Use Milleage Bonus	E2350	783.70			\$ 783.70	
Non Classified in State of Puerto Rico Travel Expenses	E2380	160.35	\$ 20.00		\$ 140.35	
Non Classified Out Of State of Puerto Rico Travel Expenses	E2390	495.01	\$ 263.34		\$ 231.67	
Accommodation Out Of Puerto Rico	E2470	902.96	\$ 287.36		\$ 615.60	
Transportation Expenses - Non Classified	E2490	1,246.50			\$ 1,246.50	
Advance Funds To Travel Disbursment Officers	E9051	(3,513.18)	\$ (3,210.02)		\$ (303.16)	
Accounting Services	E1240	35.00			\$ 35.00	
Non Classified Miscellaneous Services	E2990	673.00			\$ 673.00	
Non Capitalizable Equipment Purchase	E4414	761.60			\$ 761.60	
Office Goods and Supplies	E4012	294.80			\$ 294.80	
Laboratory Supplies	E4132	6,335.98			\$ 6,335.98	
Cloth & Cloth Materials	E4152	900.00			\$ 900.00	
Non Classified Equipment	E5490	245.00			\$ 245.00	
					s -	
	GRAND TOTAL	\$ 1,529,670.63	\$ 60,793.53	\$ 64,530.23	\$ 1,533,407.33	

Notes: The Accumulation of Payroll amount is waiting for the distribution using the Time Allocation Methodology in the new Accounting System (FIMAS).

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Commonwealth of Puerto Rico Office of the Governor Environmental Quality Board / Finance Division Title V Other Income for the Fiscal Year 2011 Registered in Fiscal Year 2012 For The Period of July 1, 2011 to June 30, 2012

Date	Acct Period	Transaction Num.	Acct.	Amount Collected
4/9/2012	11/12	5483	R1590	1,252.30
	*			\$ 1,252.30