Grossman, Lenny

From: Velez, Hector
Sent: Wednesday, April 09, 2014 11:38 AM
To: Goslin, Thomas
Cc: Grossman, Lenny; Johnson, James (James.Johnson@aa.com); Hird, David
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Attachments: AAG Draft 7003 Order on Consent 4 3 14.docx

Good morning.
As agreed, enclosed please find the draft order on consent for your review. Please excuse me for the delay. Should you have any questions or comments, please don't hesitate to contact us.
Regards.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Wednesday, April 09, 2014 10:50 AM
To: Velez, Hector
Cc: Grossman, Lenny; Johnson, James (James.Johnson@aa.com); Hird, David
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Hector,
We wanted to follow-up on our call to see if you could provide the draft order. We haven't seen anything come across yet. Thanks,

Tom

Weil
Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Monday, March 31, 2014 4:16 PM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Ok. Lenny is available tomorrow so let's have the call at **3pm** (we have the same time now) Please let me know who besides you will be in the call.
The **call-in number** is NON-
The **conference code** is RESPONSIVE
Regards.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Monday, March 31, 2014 1:49 PM
To: Velez, Hector
Cc: Grossman, Lenny

Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Hector, are you available tomorrow at 3:00 pm ET? 4:00 would also work.

Weil
Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Friday, March 28, 2014 3:36 PM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Tuesday at 2PM works for me. Please confirm.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Friday, March 28, 2014 3:27 PM
To: Velez, Hector
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Hector,
Turns out Wednesday is bad for our side. Are there times on Tuesday or Thursday that would work? Thanks,
Tom

Weil
Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Friday, March 28, 2014 1:30 PM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hi.
Wednesday, April 2, is good for me. I will have to verify Lenny's availability. Let's tentatively schedule it for **2 pm**, subject to Lenny's and your availability.
Let me know if that time works for you.
Regards.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Friday, March 28, 2014 1:25 PM
To: Velez, Hector
Cc: Grossman, Lenny

Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Hector,
Can you let me know if there are some days and times next week that would work for a call? Thanks,
Tom

Weil
Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Friday, March 14, 2014 12:29 PM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Thank you for your assistance.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Friday, March 14, 2014 11:31 AM
To: Velez, Hector
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Hector,
I spoke with American Airlines this morning and they are working to see who might be the right party and available for a call with you. We hope to be in touch sometime next week with some suggested times for a call. Best,
Tom

Weil
Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Thursday, March 13, 2014 10:38 AM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hi.
Thanks for your response. Can you please provide us with the contact information of the attorneys that do handle American's environmental issues at said facility? Your help will be deeply appreciated.
Regards.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Thursday, March 13, 2014 10:36 AM

To: Velez, Hector
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Hector,
I have passed your email along to attorneys at American Airlines. I do not represent American Airlines in connection with potential environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico, and so cannot be of further assistance at this time. Many thanks,
Tom

Weil
Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Friday, February 14, 2014 3:01 PM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Thomas D. Goslin, Esq.
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax
thomas.goslin@weil.com
Dear Attorney Goslin,
The United States Environmental Protection Agency ("EPA") Region 2 has learned that you are the legal representative for American Airlines Group, Inc. ("AA") in addressing matters related with its operations at the Luis Muñoz Marin International Airport ("LMMIA") in Isla Verde, Carolina, Puerto Rico. EPA expects to issue an Order to AA, under the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6971 et seq., Section 7003 of RCRA, 42 U.S.C. § 6973, to remedy certain conditions related to the presence of solid and/or hazardous waste which may pose an imminent and substantial endangerment to health and the environment at the LMMIA. EPA has evidence which indicates that AA contributed to such conditions requiring that necessary remedial action be taken.
It is desirable that EPA and AA work cooperatively to address the conditions and practices at the LMMIA facility. Accordingly, please contact me at your earliest convenience to further discuss this matter. I may be reached at (787) 977-5850 or via email.
Sincerely,
Héctor L. Vélez Cruz, Esq.
Lead General Attorney
Associate Regional Counsel for Caribbean Programs
Office of Regional Counsel
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 RD. 165 km 1.2
Guaynabo, PR 00968-8069

phone: 787.977.5850
email: velez.hector@epa.gov

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com, and destroy the original message. Thank you.

Grossman, Lenny

From: Velez, Hector
Sent: Thursday, May 15, 2014 11:26 AM
To: Goslin, Thomas
Cc: Grossman, Lenny; Johnson, James (James.Johnson@aa.com); Hird, David
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Attachments: LMMIA Source Removal Order on Consent.pdf

Dear Mr. Goslin,
As requested, attached please find the 2012 Order for source removal. We are sending you under separate cover a redacted copy of the final Subsurface Investigation Report that was prepared by the Respondents to the 2002 Order. Please provide us with the address to which you prefer us to send you this redacted report. Please note that both the unredacted version of this report and the Subsurface LNAPL Recovery Plan were designated by the Respondents as confidential, and may not be released by EPA. We are not in possession of a redacted version of the Recovery Plan, and can request one on your behalf if you so desire. Alternatively, you may contact Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for receipt of the unredacted documents, which we understand would be predicated by your entering into a confidentiality agreement with the PR Ports Authority. Mr. Moran may be reached at: (504) 589-9527, and his email is: earl.f.moran@exxonmobil.com
Sincerely,

Héctor L. Vélez Cruz, Esq.
Lead General Attorney
Associate Regional Counsel for Caribbean Programs
Office of Regional Counsel
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 RD. 165 km 1.2
Guaynabo, PR 00968-8069
phone: 787.977.5850
email: velez.hector@epa.gov

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Wednesday, April 16, 2014 2:09 PM
To: Velez, Hector
Cc: Grossman, Lenny; Johnson, James (James.Johnson@aa.com); Hird, David
Subject: RE: RCRA Order to American Airlines addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Hector,

We are still reviewing the draft order, but it would help if we could also review copies of some of the documents referenced in the order. Specifically, we would like to review the 2011 Final Subsurface Investigation Report, the 2012 Order on Consent issued to the 2003 respondents, and the 2013 draft Subsurface LNAPL Recovery Plan . We would appreciate if you could provide those documents at your earliest convenience. Best,
Tom

Weil
Thomas D. Goslin
Weil, Gotshal & Manges LLP

1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

Grossman, Lenny

From: Goslin, Thomas <thomas.goslin@weil.com>
Sent: Thursday, June 12, 2014 6:26 PM
To: Grossman, Lenny
Cc: Velez, Hector
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Attachments: removed.txt

Lenny,

We are reviewing and will get back to you early next week. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Grossman, Lenny [mailto:Grossman.Lenny@epa.gov]
Sent: Tuesday, June 10, 2014 3:37 PM
To: Goslin, Thomas
Cc: Velez, Hector
Subject: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

I am writing at the request of counsel to inquire regarding the status of your discussion with Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for the receipt of documents relating to the work performed under those Orders at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico.

Additionally, please be advised that issuance of the proposed Order on Consent to American Airlines Group is time critical, and to that end we respectfully request that you expedite your determination as to the willingness of American Airlines Group to enter into the proposed Order on Consent.

Sincerely,

Leonard Grossman
Senior Enforcement Team Leader

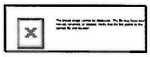
The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com, and destroy the original message. Thank you.

Grossman, Lenny

From: Goslin, Thomas <thomas.goslin@weil.com>
Sent: Wednesday, June 25, 2014 1:04 PM
To: Velez, Hector; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Attachments: removed.txt

I'm sorry. I just learned that my client is on vacation for the next two weeks and would like to participate in any discussions, so we will have to postpone the call. In the interim, though, could you provide any additional information you may have that ties American Airlines to the contamination at issue? If you could provide that in the next week or so, we will be able to review, discuss internally and be in a better position to discuss next steps with you when my client returns from vacation. Feel free to give me a call directly if you would like to discuss. Thanks,

Tom



Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Tuesday, June 24, 2014 10:22 AM
To: Goslin, Thomas; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hi.

Lenny and I are available tomorrow Wednesday, June 25, 2014, at 3 p.m. Please confirm.

Let us know if you would like us to send a call-in number in case you will have more people from your end attending the call.

Regards.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Friday, June 20, 2014 4:04 PM
To: Grossman, Lenny
Cc: Velez, Hector

Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Lenny and Hector,

Are you available next week for a call to discuss? If so, let me know if there are some times on Tuesday, Wednesday or Thursday afternoons that work. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Grossman, Lenny [mailto:Grossman.Lenny@epa.gov]
Sent: Tuesday, June 10, 2014 3:37 PM
To: Goslin, Thomas
Cc: Velez, Hector
Subject: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

I am writing at the request of counsel to inquire regarding the status of your discussion with Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for the receipt of documents relating to the work performed under those Orders at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico.

Additionally, please be advised that issuance of the proposed Order on Consent to American Airlines Group is time critical, and to that end we respectfully request that you expedite your determination as to the willingness of American Airlines Group to enter into the proposed Order on Consent.

Sincerely,

Leonard Grossman
Senior Enforcement Team Leader

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly

prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com, and destroy the original message. Thank you.

Grossman, Lenny

From: Velez, Hector
Sent: Wednesday, June 25, 2014 2:20 PM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

As indicated in paragraph 19 of the 2012 Order on Consent previously provided to and discussed with you, the largest of the three light non-aqueous phase liquid (i.e., aviation fuel) subsurface plumes identified at the Luis Muñoz Marin International Airport, with an area extent of approximately 16.9 acres, underlies the American Airlines terminal (i.e., Terminal D), extending along a southwest to northeast axis. For further information regarding this plume, we again suggest you contact Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for receipt of the unredacted subsurface investigation documents, which we understand would be predicated by your entering into a confidentiality agreement with the PR Ports Authority. Mr. Moran may be reached at: (504) 589-9527, and his email is: earl.f.moran@exxonmobil.com

Please provide a new proposed date for our next call at your earliest convenience. I would further appreciate if you would reiterate to your client our desire to expeditiously resolve this matter through issuance of an Order on Consent.

Sincerely,

Héctor L. Vélez Cruz, Esq.
Lead General Attorney
Associate Regional Counsel for Caribbean Programs
Office of Regional Counsel
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 RD. 165 km 1.2
Guaynabo, PR 00968-8069
phone: 787.977.5850
email: velez.hector@epa.gov

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Wednesday, June 25, 2014 1:04 PM
To: Velez, Hector; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

I'm sorry. I just learned that my client is on vacation for the next two weeks and would like to participate in any discussions, so we will have to postpone the call. In the interim, though, could you provide any additional information you may have that ties American Airlines to the contamination at issue? If you could provide that

in the next week or so, we will be able to review, discuss internally and be in a better position to discuss next steps with you when my client returns from vacation. Feel free to give me a call directly if you would like to discuss. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Tuesday, June 24, 2014 10:22 AM
To: Goslin, Thomas; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hi.

Lenny and I are available tomorrow Wednesday, June 25, 2014, at 3 p.m. Please confirm.

Let us know if you would like us to send a call-in number in case you will have more people from your end attending the call.

Regards.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Friday, June 20, 2014 4:04 PM
To: Grossman, Lenny
Cc: Velez, Hector
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Lenny and Hector,

Are you available next week for a call to discuss? If so, let me know if there are some times on Tuesday, Wednesday or Thursday afternoons that work. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314

+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Grossman, Lenny [mailto:Grossman.Lenny@epa.gov]
Sent: Tuesday, June 10, 2014 3:37 PM
To: Goslin, Thomas
Cc: Velez, Hector
Subject: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

I am writing at the request of counsel to inquire regarding the status of your discussion with Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for the receipt of documents relating to the work performed under those Orders at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico.

Additionally, please be advised that issuance of the proposed Order on Consent to American Airlines Group is time critical, and to that end we respectfully request that you expedite your determination as to the willingness of American Airlines Group to enter into the proposed Order on Consent.

Sincerely,

Leonard Grossman
Senior Enforcement Team Leader

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com, and destroy the original message. Thank you.

Grossman, Lenny

From: Velez, Hector
Sent: Monday, July 21, 2014 9:16 AM
To: Grossman, Lenny
Subject: FW: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Attachments: removed.txt

In our call this week we should address this too.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Tuesday, July 15, 2014 4:41 PM
To: Velez, Hector
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hector,

Apologies for the delay. As you may know, American's original local counsel was conflicted on this matter and so it had to retain new counsel. We are in the process of getting local counsel up to speed, but we will be in a position to speak the week of July 28. Can you let me know two or three days and times that would work for you and Lenny and we'll coordinate on our end? Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Thursday, July 10, 2014 11:37 AM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: FW: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

I am hereby following-up on the email I sent on June 25, 2014. Please provide a new proposed date for our next call at your earliest convenience.

We look forward to hearing from you soon.

Regards.

From: Velez, Hector
Sent: Wednesday, June 25, 2014 2:20 PM
To: 'Goslin, Thomas'
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

As indicated in paragraph 19 of the 2012 Order on Consent previously provided to and discussed with you, the largest of the three light non-aqueous phase liquid (i.e., aviation fuel) subsurface plumes identified at the Luis Muñoz Marin International Airport, with an area extent of approximately 16.9 acres, underlies the American Airlines terminal (i.e., Terminal D), extending along a southwest to northeast axis. For further information

regarding this plume, we again suggest you contact Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for receipt of the unredacted subsurface investigation documents, which we understand would be predicated by your entering into a confidentiality agreement with the PR Ports Authority. Mr. Moran may be reached at: (504) 589-9527, and his email is: earl.f.moran@exxonmobil.com

Please provide a new proposed date for our next call at your earliest convenience. I would further appreciate if you would reiterate to your client our desire to expeditiously resolve this matter through issuance of an Order on Consent.

Sincerely,

Héctor L. Vélez Cruz, Esq.
Lead General Attorney
Associate Regional Counsel for Caribbean Programs
Office of Regional Counsel
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 RD. 165 km 1.2
Guaynabo, PR 00968-8069
phone: 787.977.5850
email: velez.hector@epa.gov

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Wednesday, June 25, 2014 1:04 PM
To: Velez, Hector; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

I'm sorry. I just learned that my client is on vacation for the next two weeks and would like to participate in any discussions, so we will have to postpone the call. In the interim, though, could you provide any additional information you may have that ties American Airlines to the contamination at issue? If you could provide that in the next week or so, we will be able to review, discuss internally and be in a better position to discuss next steps with you when my client returns from vacation. Feel free to give me a call directly if you would like to discuss. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Tuesday, June 24, 2014 10:22 AM
To: Goslin, Thomas; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hi.

Lenny and I are available tomorrow Wednesday, June 25, 2014, at 3 p.m. Please confirm.

Let us know if you would like us to send a call-in number in case you will have more people from your end attending the call.

Regards.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Friday, June 20, 2014 4:04 PM
To: Grossman, Lenny
Cc: Velez, Hector
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Lenny and Hector,

Are you available next week for a call to discuss? If so, let me know if there are some times on Tuesday, Wednesday or Thursday afternoons that work. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Grossman, Lenny [mailto:Grossman.Lenny@epa.gov]
Sent: Tuesday, June 10, 2014 3:37 PM
To: Goslin, Thomas
Cc: Velez, Hector
Subject: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

I am writing at the request of counsel to inquire regarding the status of your discussion with Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for the receipt of documents relating to the work performed under those Orders at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico.

Additionally, please be advised that issuance of the proposed Order on Consent to American Airlines Group is time critical, and to that end we respectfully request that you expedite your determination as to the willingness of American Airlines Group to enter into the proposed Order on Consent.

Sincerely,

Leonard Grossman
Senior Enforcement Team Leader

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com, and destroy the original message. Thank you.

Grossman, Lenny

From: Velez, Hector
Sent: Monday, July 21, 2014 11:50 AM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,
Please contact me at your earliest convenience to arrange a conference call to discuss negotiation of the Consent Order. I would also appreciate your providing of an update on your contact with the project operating committee with regard to obtaining the background documents you had indicated necessary for your review. Please note that absent reasonable progress towards such an agreement in the near future, we will consider the use of an alternative legal mechanism to bring American Air Group into the project operating committee for the purpose of effecting subsurface recovery of jet fuel at the Luis Munoz Marin International Airport.
Sincerely,

Héctor L. Vélez Cruz, Esq.
Lead General Attorney
Associate Regional Counsel for Caribbean Programs
Office of Regional Counsel
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 RD. 165 km 1.2
Guaynabo, PR 00968-8069
phone: 787.977.5850
email: velez.hector@epa.gov

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Tuesday, July 15, 2014 4:41 PM
To: Velez, Hector
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hector,
Apologies for the delay. As you may know, American's original local counsel was conflicted on this matter and so it had to retain new counsel. We are in the process of getting local counsel up to speed, but we will be in a position to speak the week of July 28. Can you let me know two or three days and times that would work for you and Lenny and we'll coordinate on our end? Thanks,
Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Thursday, July 10, 2014 11:37 AM
To: Goslin, Thomas
Cc: Grossman, Lenny

Subject: FW: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

I am hereby following-up on the email I sent on June 25, 2014. Please provide a new proposed date for our next call at your earliest convenience.

We look forward to hearing from you soon.

Regards.

From: Velez, Hector
Sent: Wednesday, June 25, 2014 2:20 PM
To: 'Goslin, Thomas'
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

As indicated in paragraph 19 of the 2012 Order on Consent previously provided to and discussed with you, the largest of the three light non-aqueous phase liquid (i.e., aviation fuel) subsurface plumes identified at the Luis Muñoz Marin International Airport, with an area extent of approximately 16.9 acres, underlies the American Airlines terminal (i.e., Terminal D), extending along a southwest to northeast axis. For further information regarding this plume, we again suggest you contact Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for receipt of the unredacted subsurface investigation documents, which we understand would be predicated by your entering into a confidentiality agreement with the PR Ports Authority. Mr. Moran may be reached at: (504) 589-9527, and his email is: earl.f.moran@exxonmobil.com

Please provide a new proposed date for our next call at your earliest convenience. I would further appreciate if you would reiterate to your client our desire to expeditiously resolve this matter through issuance of an Order on Consent.

Sincerely,

Héctor L. Vélez Cruz, Esq.
Lead General Attorney
Associate Regional Counsel for Caribbean Programs
Office of Regional Counsel
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 RD. 165 km 1.2
Guaynabo, PR 00968-8069
phone: 787.977.5850
email: velez.hector@epa.gov

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Wednesday, June 25, 2014 1:04 PM
To: Velez, Hector; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

I'm sorry. I just learned that my client is on vacation for the next two weeks and would like to participate in any discussions, so we will have to postpone the call. In the interim, though, could you provide any additional information you may have that ties American Airlines to the contamination at issue? If you could provide that in the next week or so, we will be able to review, discuss internally and be in a better position to discuss next steps with you when my client returns from vacation. Feel free to give me a call directly if you would like to discuss. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Tuesday, June 24, 2014 10:22 AM
To: Goslin, Thomas; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hi.

Lenny and I are available tomorrow Wednesday, June 25, 2014, at 3 p.m. Please confirm.

Let us know if you would like us to send a call-in number in case you will have more people from your end attending the call.

Regards.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Friday, June 20, 2014 4:04 PM
To: Grossman, Lenny
Cc: Velez, Hector
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Lenny and Hector,

Are you available next week for a call to discuss? If so, let me know if there are some times on Tuesday, Wednesday or Thursday afternoons that work. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Grossman, Lenny [mailto:Grossman.Lenny@epa.gov]
Sent: Tuesday, June 10, 2014 3:37 PM
To: Goslin, Thomas
Cc: Velez, Hector
Subject: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

I am writing at the request of counsel to inquire regarding the status of your discussion with Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for the receipt of documents relating to the work performed under those Orders at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico.

Additionally, please be advised that issuance of the proposed Order on Consent to American Airlines Group is time critical, and to that end we respectfully request that you expedite your determination as to the willingness of American Airlines Group to enter into the proposed Order on Consent.

Sincerely,

Leonard Grossman
Senior Enforcement Team Leader

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com, and destroy the original message. Thank you.

Grossman, Lenny

From: Goslin, Thomas <thomas.goslin@weil.com>
Sent: Tuesday, November 18, 2014 12:13 PM
To: Velez, Hector
Cc: Grossman, Lenny; Johnson, James; Eduardo Negron Navas (ENEGRON@fgrlaw.com); Hird, David
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico
Attachments: removed.txt

Hector,

We are happy to discuss the proposed Order with you (though we are still trying to find a time that will work for our side), but as you may know, we still have not been provided with the documentation we requested from the Work Group in August, despite our repeated attempts. As you recall, we spoke with the Work Group on August 8. Later that month we were provided with one preliminary evaluation report prepared in 1994 that provided no specific information on how American may be tied to any contamination at the site. On our call, the Work Group members indicated that they had such information, but demanded that we enter into a confidentiality agreement before they would share it with American. On August 22, at the Work Group's request, we prepared and submitted a draft confidentiality agreement to the Group members for their collective review and comment. In late September, we were informed by the Work Group that, instead of commenting on our draft, the members would prepare their own confidentiality agreement for our review. We have never been provided with that agreement. We follow up regularly with the Work Group to inquire about the status of that agreement; however, we have not received any response. As such, we don't have much more information on American's connection to the site than we did when we last spoke. That said, if you still would like to discuss, we will let you know shortly some times that work for our side. Regards,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Monday, November 17, 2014 4:29 PM
To: Goslin, Thomas
Cc: Grossman, Lenny; Johnson, James; Eduardo Negron Navas (ENEGRON@fgrlaw.com); Hird, David
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

We would like to speak with you to discuss the proposed Order on Consent with American Air Group regarding the recovery of subsurface fuel at the Luis Munoz Marin International Airport. Please let me know if **11/19** at **9:00 EST** / 10:00 AST is acceptable, or provide an alternative date/time if not, and I will send an invite via Outlook.

Best regards,

Héctor

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Friday, August 08, 2014 2:34 PM
To: Velez, Hector
Cc: Grossman, Lenny; Johnson, James; Eduardo Negron Navas (ENEGRON@fgrlaw.com); Hird, David
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hector,

We spoke with Earl Moran and several other group members earlier today. They are going to get us some documents next week that we hope will provide greater clarity on the cause of the contamination. Once we are able to review, we expect to be in a position to continue our discussions. We will advise once we receive the documents. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Tuesday, August 05, 2014 5:18 PM
To: Goslin, Thomas
Cc: Grossman, Lenny; Johnson, James; Eduardo Negron Navas (ENEGRON@fgrlaw.com); Hird, David
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Thanks for keeping us posted.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Tuesday, August 05, 2014 5:10 PM
To: Velez, Hector
Cc: Grossman, Lenny; Johnson, James; Eduardo Negron Navas (ENEGRON@fgrlaw.com); Hird, David
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hector,

We wanted to let you know that we reached out to Earl Moran last week after our call and were just able to schedule a time to speak with Mr. Moran and other representatives of the group at 11:00 am on Friday, August 8. That was the earliest they were available to speak with us. We'll be back in touch after we've spoke with the group. Regards,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Monday, July 21, 2014 11:50 AM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

Please contact me at your earliest convenience to arrange a conference call to discuss negotiation of the Consent Order. I would also appreciate your providing of an update on your contact with the project operating committee with regard to obtaining the background documents you had indicated necessary for your review. Please note that absent reasonable progress towards such an agreement in the near future, we will consider the use of an alternative legal mechanism to bring American Air Group into the project operating committee for the purpose of effecting subsurface recovery of jet fuel at the Luis Munoz Marin International Airport.

Sincerely,

Héctor L. Vélez Cruz, Esq.
Lead General Attorney
Associate Regional Counsel for Caribbean Programs
Office of Regional Counsel
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 RD. 165 km 1.2
Guaynabo, PR 00968-8069
phone: 787.977.5850
email: velez.hector@epa.gov

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Tuesday, July 15, 2014 4:41 PM
To: Velez, Hector
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hector,

Apologies for the delay. As you may know, American's original local counsel was conflicted on this matter and so it had to retain new counsel. We are in the process of getting local counsel up to speed, but we will be in a position to speak the week of July 28. Can you let me know two or three days and times that would work for you and Lenny and we'll coordinate on our end? Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Thursday, July 10, 2014 11:37 AM
To: Goslin, Thomas
Cc: Grossman, Lenny
Subject: FW: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

I am hereby following-up on the email I sent on June 25, 2014. Please provide a new proposed date for our next call at your earliest convenience.

We look forward to hearing from you soon.

Regards.

From: Velez, Hector
Sent: Wednesday, June 25, 2014 2:20 PM
To: 'Goslin, Thomas'
Cc: Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

As indicated in paragraph 19 of the 2012 Order on Consent previously provided to and discussed with you, the largest of the three light non-aqueous phase liquid (i.e., aviation fuel) subsurface plumes identified at the Luis Muñoz Marin International Airport, with an area extent of approximately 16.9 acres, underlies the American Airlines terminal (i.e., Terminal D), extending along a southwest to northeast axis. For further information regarding this plume, we again suggest you contact Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for receipt of the unredacted subsurface investigation documents, which we understand would be predicated by your entering into a confidentiality agreement with the PR Ports Authority. Mr. Moran may be reached at: (504) 589-9527, and his email is: earl.f.moran@exxonmobil.com

Please provide a new proposed date for our next call at your earliest convenience. I would further appreciate if you would reiterate to your client our desire to expeditiously resolve this matter through issuance of an Order on Consent.

Sincerely,

Héctor L. Vélez Cruz, Esq.
Lead General Attorney
Associate Regional Counsel for Caribbean Programs
Office of Regional Counsel
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 RD. 165 km 1.2
Guaynabo, PR 00968-8069
phone: 787.977.5850
email: velez.hector@epa.gov

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Wednesday, June 25, 2014 1:04 PM
To: Velez, Hector; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

I'm sorry. I just learned that my client is on vacation for the next two weeks and would like to participate in any discussions, so we will have to postpone the call. In the interim, though, could you provide any additional information you may have that ties American Airlines to the contamination at issue? If you could provide that in the next week or so, we will be able to review, discuss internally and be in a better position to discuss next steps with you when my client returns from vacation. Feel free to give me a call directly if you would like to discuss. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP

1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Velez, Hector [mailto:Velez.Hector@epa.gov]
Sent: Tuesday, June 24, 2014 10:22 AM
To: Goslin, Thomas; Grossman, Lenny
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Hi.

Lenny and I are available tomorrow Wednesday, June 25, 2014, at 3 p.m. Please confirm.

Let us know if you would like us to send a call-in number in case you will have more people from your end attending the call.

Regards.

From: Goslin, Thomas [mailto:thomas.goslin@weil.com]
Sent: Friday, June 20, 2014 4:04 PM
To: Grossman, Lenny
Cc: Velez, Hector
Subject: RE: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Lenny and Hector,

Are you available next week for a call to discuss? If so, let me know if there are some times on Tuesday, Wednesday or Thursday afternoons that work. Thanks,

Tom

Thomas D. Goslin
Weil, Gotshal & Manges LLP
1300 Eye Street NW, Suite 900
Washington, DC 20005-3314
+1 202 682 7508 Direct
+1 202 857 0940 Fax

From: Grossman, Lenny [mailto:Grossman.Lenny@epa.gov]
Sent: Tuesday, June 10, 2014 3:37 PM
To: Goslin, Thomas
Cc: Velez, Hector

Subject: RCRA Order to American Airlines Group addressing environmental issues at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico

Dear Mr. Goslin,

I am writing at the request of counsel to inquire regarding the status of your discussion with Mr. Earl Moran, Project Operating Committee chairperson for the Respondents to the 2002 and 2012 Orders, to arrange for the receipt of documents relating to the work performed under those Orders at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico.

Additionally, please be advised that issuance of the proposed Order on Consent to American Airlines Group is time critical, and to that end we respectfully request that you expedite your determination as to the willingness of American Airlines Group to enter into the proposed Order on Consent.

Sincerely,

Leonard Grossman
Senior Enforcement Team Leader

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com, and destroy the original message. Thank you.