



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
CARRIBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA II BUILDING, 7TH FLOOR
ROUTE 165 GUAYNABO, PUERTO RICO 00968

ENCLOSURE II – RCRA § 3008 NOTICE OF VIOLATION

Boehringer Ingelheim Animal Health Puerto Rico LLC
EPA ID: PRR000025189
CEPD-RCRA-23-0000-3008-010

On or about July 19, 2023, a duly authorized representative of EPA conducted a Resource Conservation and Recovery Act (RCRA) Hazardous Waste Compliance Evaluation Inspection (CEI) of the Boehringer Ingelheim Animal Health Puerto Rico LLC (the Facility) located at Rd 2 Km 56.7 Bo Trinidad, Barceloneta, Puerto Rico, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. As a result of the CEI, EPA has identified the following violations of the RCRA regulations.

i. 40 C.F.R. § 262.15(a)(5)(i)

At the time of the inspection, Boehringer Ingelheim Animal Health Puerto Rico LLC failed § 40 C.F.R., § 262.15(a)(5)(i) which required a generator to mark or label its container with the following: *“the words “Hazardous Waste...”*”.

The Facility failed to comply with this requirement in the F6 Satellite Accumulation Area (SAA) and in the Paint Shop SAA. At the F6 SAA, a 5-gallon container of isopropyl alcohol waste was not marked and/or labeled with the words “hazardous waste” and at the Paint Shop SAA, a 55-gallon drum of waste paint was not marked and/or labeled with the words “hazardous waste”.

ii. 40 C.F.R. § 262.15(a)(5)(ii)

At the time of the inspection, Boehringer Ingelheim Animal Health Puerto Rico LLC failed § 40 C.F.R., § 262.15(a)(5)(ii) which required a generator to mark or label its container with the following: *“An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at [49 CFR part 172 subpart E](#) (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at [29 CFR 1910.1200](#); or a chemical hazard label consistent with the National Fire Protection Association code 704).”*

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The Facility failed to comply with this requirement in the F6 SAA and in the Paint Shop SAA. At the F6 SAA, a 5-gallon container of isopropyl alcohol waste was not marked and/or labeled with an indication of the hazards of the contents and at the Paint Shop SAA, a 55-gallon drum of waste paint was not marked and/or labeled with an indication of the hazards of the contents.