



EPA REGION 2  
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION

February 20, 2024

**Vía Electronic Mail**

Carlos R. Caez-Sierra  
Colonel  
Camp Santiago  
State Rd #1, Intersection Rd #154  
Salinas, Puerto Rico 00751  
[carlos.r.caezsierra.mil@army.mil](mailto:carlos.r.caezsierra.mil@army.mil)

RE: **RCRA § 3007 – REQUEST FOR INFORMATION**  
**Facility Name: Camp Santiago – Maneuver Area Training Equipment Site (MATES)**  
**EPA ID: PRD982275406**  
**CEPD-RCRA-24-3007-0000-006**

Dear Colonel Caez-Sierra:

The United States Environmental Protection Agency (EPA) is charged with the protection of human health and the environment under Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HWSA) of 1984, 42 U.S.C. §§ 6901, 6928.

This request for information is made pursuant to the provisions of Section 3007 of RCRA, 42 U.S.C. § 6927, which requires that you provide the information requested in Enclosure I to this letter using the instructions and definitions included in Enclosure II. This information is required to evaluate the full regulatory and compliance status of the facility. The information requested in Enclosure I must be submitted no later than thirty (30) calendar days from receipt of this letter. Requests for additional time to provide the information requested in Enclosure I must be justified and made in writing within ten (10) calendar days of receipt of this letter. The response must be signed by a responsible official or agent of your facility, using the form in Enclosure III to this letter.

Failure to respond to this letter truthfully and accurately within the time provided may subject you to sanctions authorized by federal law, including but not limited to a potential enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, including the assessment of a monetary penalty. Please also note that all information you provide may be used in an administrative, or criminal action. This information request is not subject to the requirements of the Paperwork Reduction Act as amended, 44 U.S.C. § 3501 et seq.

You may, if you desire, assert a business confidentiality claim covering all or part of the information herein requested. This claim may be asserted by placing on (or attaching to) the information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret”, “proprietary”, or “company confidential”. The claim should set forth the information requested in 40 C.F.R. § 2.204(e)(4). Information covered by such a claim will be disclosed by EPA only to the extent permitted by, and by means of procedures set forth in 40 C.F.R. Part 2. EPA will review the information to determine the extent of confidentiality of the information, and may, at its discretion challenge the confidentiality claim pursuant to the procedures set forth at 40 C.F.R. Part 2. If no such claim accompanies the information when it is received by EPA, it may be available to the public by EPA without further notice you.

The responses to the information request in Enclosure I must be provided either by email or by mail to the following address:

Carlos J. Colombani, Enforcement Officer  
Response and Remediation Branch  
U.S. Environmental Protection Agency - Region 2  
Caribbean Environmental Protection Division  
City View Plaza II, Suite 7000  
#48 PR-165 km 1.2  
Guaynabo, PR 00968-8069  
[colombani.carlos@epa.gov](mailto:colombani.carlos@epa.gov)

If you have any questions regarding this matter, please contact Mr. Colombani, of my staff, at 787-977-5862 or via e-mail at [colombani.carlos@epa.gov](mailto:colombani.carlos@epa.gov).

Sincerely,

**HECTOR  
VELEZ-CRUZ** Digitally signed by  
HECTOR VELEZ-CRUZ  
Date: 2024.02.20  
22:03:16 -04'00'

Hector L. Velez-Cruz, Esq.  
Acting Director

Enclosures:

- I. Request for Information
- II. Instructions and Definitions
- III. Certification of Answers

cc: Lorna Rodríguez, Chief  
Hazardous Waste Enforcement Program  
Puerto Rico Department of Natural & Environmental Resources  
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Rio Piedras, PR 00936  
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**ENCLOSURE I**  
**RCRA § 3007 REQUEST FOR INFORMATION**

Facility Name: Camp Santiago – MATES  
EPA ID No.: PRD982275406

On or about May 22-23, 2023, duly authorized representatives of EPA conducted a consolidated multi-media inspection (MMI) at Camp Santiago. The MMI included a RCRA hazardous waste compliance evaluation pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, at the Maneuver Area Training Equipment Site (MATES) (the Facility) located at State Rd #1, Intersection Rd #154, Salinas, Puerto Rico.

On September 5, 2023, EPA emailed the Facility a MMI report alongside a 45-Day Letter requesting feedback on several preliminary findings. On October 19, 2023, the Facility provided a response stating that during calendar years 2019, 2020 and 2021, MATES was a small quantity generator (SQG) for generating more than one hundred (100) kilograms but less than one thousand (1,000) kilograms of non-acute hazardous waste per month, and not a very small quantity generator (VSQG) as listed in RCRAInfo, a national program management and inventory system about hazardous waste handlers.

Based on the information obtained during the inspection, and the Facility's 45-Day Letter response, EPA determined that the following information is required to fully determine the compliance status of the Facility.

*Manifests*

1. Provide a signed copy with the handwritten signature of the owner or operator of the designated facility the hazardous waste was transported to for the following manifest tracking numbers:
  - a. 019765061JJK shipped on January 28, 2019;
  - b. 019765379JJK shipped on June 25, 20219;
  - c. 020920707JJK shipped on December 10, 2019;
  - d. 021854002JJK shipped on September 22, 2020;
  - e. 023163514JJK shipped on June 28, 2021; and
  - f. 023163890JJK shipped on November 9, 2021.

*Waste Analysis, Waste Determination and Land Disposal Restrictions*

2. Provide the waste analysis, waste determination, and land disposal restrictions for the following manifest tracking numbers:
  - a. 021854002JJK shipped on September 22, 2020;

- b. 023163514JJK shipped on June 28, 2021; and
- c. 023163890JJK shipped on November 9, 2021.

*Preparedness, Prevention and Training*

- 3. Provide records that document the arrangements with local response agencies.
- 4. Provide records that document employee familiarization with waste handling and emergency procedures.
- 5. Provide the name(s) of the designated emergency coordinator(s) for calendar years 2019, 2020 and 2021.

*Re-Notification*

- 6. Provide the Re-Notification EPA Form 8700-12 for calendar year 2021.

*Central Accumulation Area (CAA)*

- 7. Provide the weekly inspection logs for calendar years 2020 and 2021.

## **ENCLOSURE II INSTRUCTIONS AND DEFINITIONS**

In responding to this Request for Information, apply the following instructions and definitions:

1. The signatory should be an officer or agent who is authorized to respond on behalf of the company or facility. The signatory must complete and return the attached Certification of Answers to Responses (ENCLOSURE III).
2. A complete response must be made to each individual question in this Request for Information. Identify each answer with the number of the question to which it is addressed.
3. In preparing your response to each question, consult with all present and former employees and agents of the company or facility who you have reason to believe may be familiar with the matter to which the question pertains.
4. In answering each question, identify all contributing sources of information.
5. If you are unable to answer a question in a detailed and complete manner or if you are unable to provide any of the information or documents requested, indicate the reason for your inability to do so. If you have reason to believe that there is an individual who may be able to provide more detail or documentation in response to any question, state that person's name and last known address and phone number and the reasons for your belief.
6. If you cannot provide a precise answer to any question, please approximate and state the reason for your inability to be specific.
7. For each document produced in response to this Request for Information, indicate on the document or in some other reasonable manner, the number of the question to which it applies.
8. If anything is deleted from a document produced in response to this Request for Information, state the reason for and the subject matter of the deletion.
9. If a document is requested but is not available, state the reason for its unavailability. In addition, identify any such document by author, date, subject matter, number of pages, and all recipients and their addresses.
10. The company and/or facility for the purposes of this Request for Information is Camp Santiago – Maneuver Area Training Equipment Site (MATES) at State Rd #1, Intersection Rd #154, Salinas, Puerto Rico.

11. A *hazardous waste generator* is defined, for the purposes of this Request for Information, as any person (which includes this facility), by site, whose act or process produces hazardous waste or whose act first causes a hazardous waste to become subject to regulation.
12. *Hazardous waste* is defined, for the purposes of this Request for Information, as it is defined in Section 1004(5) of RCRA, as amended, 42 USC 6903(5).
13. *Manage* is defined, for the purposes of this Request for Information, as: to market, generate, treat, store, dispose, or otherwise handle.
14. *Hazardous Constituents* is defined, for the purposes of this Request for Information, as those substances listed in 40 CFR 261 Appendix VIII.
15. The term *Solid Waste Management Unit (SWMU)* is defined, for the purposes of this Request for Information, as any landfill, surface impoundment, land application area, waste pile, incinerator, tank, injection well, transfer station, waste recycling operation, tank, or container storage area that currently or formerly was used to manage a solid waste.
16. Used oil shall be defined for the purposes of this Request for Information as any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use is contaminated by physical or chemical impurities.

**ENCLOSURE III**  
**Certification of Answers**

**CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION**

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in response to EPA's Request for Information, and all documents submitted herewith; that the submitted information is true, accurate, and complete; and that all documents submitted herewith are complete and authentic, unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

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Name (Print or Type)

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Title (Print or Type)

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Signature

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Date (Print or Type)

Facility Name: Camp Santiago – Maneuver Area Training Equipment Site (MATES)  
EPA ID: PRD982275406