

ENCLOSURE I – RCRA § 3007 REQUEST FOR INFORMATION

On or about October 10, 2024, a duly authorized representative of EPA conducted a RCRA Hazardous Waste Compliance Evaluation Inspection at Sartorius Stedim Filters Inc – ECO Building located in Yauco, Puerto Rico, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. The inspection included a site visit to the Demaco Terminal Operations Corp. (the Facility) located at Road 127 Km 13.5, Guayanilla, Puerto Rico. Based on the information obtained, the following information is required to determine the compliance status of the Facility.

General Information

1. Provide the full legal name of Demaco Terminal Operations Corp. If the company has used any other names, please provide them.
2. Provide the management structure of the company (President/Owner, Partners, General Manager, etc.). If the company is a subsidiary, indicate the parent company.
3. Provide the type of company (corporation, partnership, etc.), employer identification number, Department of State certificate number, DUNS number, and business licenses, if any.
4. Besides the EPA inspection performed on or about October 10, 2024, please provide information about any other inspection conducted by any other State or Federal agency, since 2020.
5. Do you have any knowledge of any State or Federal agency (EPA, Department of Justice, Puerto Rico Department of Natural and Environmental Resources, etc.) actions (complaints, suits, investigations, etc.) against Demaco Terminal Operations Corp.? If yes, explain and elaborate your answers.
6. Please certify if Demaco Terminal Operations Corp. has filed for bankruptcy at any time under its current or any previous name.

Specific Information

a. Waste Generation

- i. Please describe each activity conducted at Demaco Terminal Operations Corp. that has generated solid and/or hazardous waste (as defined in 40 C.F.R. Part 261) since 2020.
- ii. Please list the solid, universal, and/or hazardous wastes generated from each activity indicated in Response to Question a.i. above (i.e. spent solvent, leftover chemical mixtures,

discarded and/or expired chemical products, discarded laboratory reagents, used oil, used oil filters, used oil impacted materials, spent lead-acid batteries, spent paint brushes/rolls, spent rags impregnated with paints/solvents, spent lacquer thinner, spent diesel, spent fluorescent bulbs, etc.).

- iii. Please indicate the monthly quantity of each such waste in kilograms generated since 2020 to the present.
- iv. Please provide the manifests generated as part of the hazardous waste storage, handling, and/or disposal activities at the Facility since 2020 to the present.

b. Oldware

- i. Between April 2021 and March 2022, Demaco Terminal Operations Corp. received approximately 650,000 gallons of Oldware (containing isopropyl alcohol, 2-pyrrolidone, glycerin and water) from Sartorius Stedim Filters, Inc.
- ii. The Oldware is currently being stored in two aboveground storage tanks. Tank #603 with a rating capacity of 500,000 gallons and Tank # 605 with a rating capacity of 520,00 gallons.
- iii. Was a waste profile and/characterization completed prior to accepting the Oldware for storage? If yes, please provide documentation.
- iv. Was an assessment completed to determine the tanks were compatible with the Oldware? If yes, please provide documentation.
- v. Provide a description on how the Oldware was transferred to the Facility.
- vi. Provide all inspection documents related to Tank # 603 and Tank # 605 prior to the Oldware being stored.
- vii. Provide all inspection documents related to Tank # 603 and Tank # 605 since the first drop of Oldware was stored to the present.

c. Personnel Training

- i. Provide a copy of the training program established for employees associated with the management of hazardous waste.
- ii. List all employees associated with the management of hazardous waste at the Facility.
- iii. For the employees listed, provide documentation demonstrating that the training was completed for calendar years 2022, 2023, and 2024.

d. Contingency Plan

- i. Provide a copy of the Facility's latest contingency plan