

US Environmental Protection Agency – Region 2
 Caribbean Environmental Protection Division
 Response and Remediation Branch



Resource Conservation and Recovery Act (RCRA)
 Compliance Evaluation Inspection

Facility Name:	Aluminios de Puerto Rico LLC		
EPA ID Number:	PRR000026443		
FRS:	11007119287		
Date of Inspection:	April 24, 2024		
Generator Status in Record:	Large Quantity Generator (LQG)		
Generator Status at the time of inspection:	LQG		
RCRA Permitted:	No		
Basis for Inspection:	Core Program		
Corrective Action:	No		
Potential EJ Concern	Yes. At least 2 EJ Indexes above the 90% USA Percentile. (See Appendix C)		
Potential Flood Prone Area	Yes. (See Appendix D)		
Facility Physical Location: (Municipality, PR, zip code)	PR-3 Km 77.4 Barrio Rio Abajo Solar 5 Humacao, PR 00791		
Mailing Address:	PO Box 33 Punta Santiago, PR 00741		
Geographical Coordinates:	18.146111, -65.797996		
Facility Owner:	Aluminios de Puerto Rico LLC		
Facility Operator:	Aluminios de Puerto Rico LLC		
NAICS:	33131, Alumina and Aluminum Production and Processing		
SIC:	3334, Primary Aluminum		
Area:	~10 acres		
Number Employees:	~80		
Personnel participating in the inspection:			
Name	Affiliation	Title	Contact Information
Carlos J. Colombani	EPA Region 2 CEPD-RRB	Enforcement Officer	787-977-5862; colombani.carlos@epa.gov
Alfredo J. Cintron	Aluminios de PR LLC	Assistant, Plant Manager	787-331-5400; acintron@aluminiospr.com
Status:	Final		
Record Schedule:	1044(c)		

Resource Conservation and Recovery Act
Aluminios de Puerto Rico LLC
PRR000026443

EPA Inspector Signature/Date	X  Digitally signed by CARLOS COLOMBANI DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=CARLOS COLOMBANI, 0.9.2342.19200300.100.1.1=6800100366 7785 Date: 2024.05.13 13:04:32 -04'00' Adobe Acrobat version: 2024.002.20687 Carlos Josue Colombani Enforcement Officer
Supervisor Signature/Date	X DAVID CUEVAS- MIRANDA Digitally signed by DAVID CUEVAS-MIRANDA Date: 2024.05.13 13:14:33 -04'00' David N. Cuevas Miranda, Ph.D. Supervisor

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1 INTRODUCTION

On April 24, 2024, a Resource Conservation and Recovery Act (RCRA) Subtitle C Compliance Evaluation Inspection (CEI) was conducted at Aluminios de Puerto Rico LLC (the Facility), pursuant to Section 3007 of RCRA. As part of the inspection, an opening conference, walkthrough, document review and closing conference were conducted to evaluate the Facility's compliance with the requirements that govern hazardous waste generators, universal waste handlers and used oil generators, as applicable.

The Facility is located at PR-3 Km 77.4, Barrio Rio Abajo, Solar 5, Humacao, Puerto Rico, 00791. See aerial photograph (Figure 1) below for reference.



Figure 1: Overview of Aluminios de Puerto Rico LLC Aerial Photograph

The purpose of this inspection was to evaluate the Facility's compliance with the RCRA requirements for hazardous waste management. Based on EPA's RCRAInfo database, the Facility is listed as a large quantity generator (LQG) of hazardous waste and has never been inspected by EPA. The Puerto Rico Department of Natural and Environmental Resources (PR DNER) inspected the Facility on August 21, 2019. Under EPA Policy, LQGs are required to be inspected every five (5) years and thus, an inspection was due in 2024. The onsite inspection conducted on April 24, 2024, was unannounced.

2 OPENING CONFERENCE

I met with Mr. Alfredo J. Cintron, Assistant Plant Manager, for the opening conference. I identified myself as an EPA RCRA enforcement officer, told the Facility representative the purpose of the inspection, and offered an opportunity to claim confidential business information (CBI).

I then proceeded to request documents that would be needed to complete the compliance evaluation. These were the following:

- Hazardous waste manifests;
- Land disposal restrictions;
- RCRA personnel training;
- Contingency Plan;
- Quick reference guide;
- Biennial report; and
- Weekly inspections.

I also explained the areas that required a visit to ensure compliance with the regulations. A plan was put in place to ensure these areas were inspected during the walkthrough.

2.1 FACILITY BACKGROUND AND OPERATION

The actual plant has been at its location since approximately the 1990s but was acquired by Aluminios de Puerto Rico (ALPUR) LLC in 2015. With a four-million-dollar investment to acquire the plant and a two (2) million-dollar investment to repair the structure after damages caused by Hurricane Maria, the Facility started operating in 2019.

Its main function is the aluminum extrusion, a process by which aluminum alloy material is forced through a die with a specific cross-sectional profile. The Facility currently manufactures aluminum doors, windows, storm shutters, and other profiles. Ninety-eight (98) percent of the product manufactured is distributed inland, while the other two (2) percent is distributed internationally.

The Facility representative reported that the plant currently employs approximately eighty (80) employees between two (2) shifts from Monday through Friday. Aluminios de Puerto Rico LLC covers an area of about ten (10) acres.

2.2 SOLID AND HAZARDOUS WASTE GENERATION

Aluminios de PR LLC generates hazardous and nonhazardous wastes from its paint room, process line, facility maintenance, and wash area. The paint room and wash area have designated Satellite Accumulation Areas (SAAs) for hazardous waste management. The Facility accumulates its hazardous and non-hazardous waste in a Central Accumulation Area (CAA). Hazardous waste is generated daily throughout the Facility.

Majority of the hazardous waste generated is shipped under waste codes D001 (ignitable), D002 (corrosive), and F-listed spent non-halogenated solvents (F003 and F005). Typically, the bulk of the hazardous waste is generated during the painting and washing processes. The Facility utilizes Veolia Environmental Services LLC as their dedicated waste hauler.

3 FACILITY WALKTHROUGH

Mr. Cintron accompanied me during the facility walkthrough. The following areas were inspected for compliance:

- Wash Area SAA;
- CAA; and
- Used Oil Area.

The observations for each area are described below.

3.1 SATELLITE ACCUMULATION AREAS (SAAs)

As mentioned above, the Wash Area SAA was visited to evaluate compliance with the RCRA regulations. The area is located outside of the Facility but only generates hazardous waste when a bulk of product is washed. This generates a caustic sludge that is extracted from the machinery and stored in 55-gallon drums for waste disposal. At the time of the inspection, there was no hazardous waste in the SAA.

The Facility's main hazardous waste stream is in the Paint Room, See Appendix A, Photograph One (1) for an outside overview of this area. The room is divided into two work areas: a preparation area, and the paint room.

Due to safety measures, I did not visit the SAAs where the 55-gallon drums are. A respirator was needed because of the volatile organic compounds (VOCs) releasing from the paint process. Mr. Cintron took several photographs of the 55-gallon drums.

Based on what Mr. Cintron stated, the preparation area and the paint room had the following hazardous waste:

- a 55-gallon drum of solid paint;
- two (2) 55-gallon drums of liquid paint (containing xylene); and
- a 55-gallon drum of used rags.

I requested the photographs Mr. Cintron took of the SAAs but as of May 9, 2024, these have not been provided.

3.2 CENTRAL ACCUMULATION AREAS (CAA)

At the time of the inspection, the CAA was accumulating the following hazardous waste:

Hazardous Waste	Accumulation Start Date(s)
3 55-gallon drums of caustic sludge and waste solutions	- February 1, 2024 - February 1, 2024 - February 1, 2024
4 55-gallon drums of solid waste paint (containing xylene)	- April 5, 2024 - April 5, 2024 - April 5, 2024 - April 5, 2024
4 55-gallon drums of liquid waste paint (containing xylene)	- April 15, 2024 - April 15, 2024 - April 15, 2024 - April 15, 2024

The hazardous waste is accumulated in a locked cage inside a room within the Facility. The cage had the Facility's RCRA ID number and a "hazardous waste storage area" placard posted, See Appendix A, Photograph Two (2).

The drums were properly labeled with the words "hazardous waste", accumulation start dates and with an indication of the nature of its hazard, See Appendix A, Photographs Three (3), Four (4) and Five (5). There was a charged and inspected fire extinguisher (See Appendix A, Photograph Six [6]), and an eye washing station (See Appendix A, Photograph Seven [7]).

Although there were no spill kits inside the room where the cage is situated, the cage itself serves as a secondary containment. The room lacked automatic sprinklers, water spray systems, foam producing equipment, and/or adequate water volume and pressure to supply water hose streams. There was no radio/communication device readily accessible in case of an emergency, but Mr. Cintron stated that the personnel handling hazardous waste always carry a cellphone.

3.3 UNIVERSAL WASTE

At the time of the inspection, Mr. Cintron stated that the Facility was not accumulating any universal waste, and that the plant switched from fluorescent light bulbs to light-emitting diode (LED) bulbs.

3.4 USED OIL

The Facility generates used oil from its machinery. It is accumulated in two areas outside (adjacent to the building) for recycling. These areas have permanent awning as a preventive measure from weather exposure.

4 DOCUMENT REVIEW

During the inspection, I requested the documents listed under Section 2 of this report. Below are the observations noted after the document review was completed. Note, the documents that were not provided by the Facility at the time of the inspection were requested to be submitted electronically by May 8, 2024.

Weekly Inspections

Central Accumulation Area

On May 8, 2024, the Facility provided weekly inspection logs from January 2021 through December 2023. As of May 9, 2024, the Facility has not provided the weekly inspection logs from January through April of 2024.

The checklist includes verifying that containers are in good condition, that the hazardous waste is accumulated in compatible containers, that the containers are properly labeled with the words “hazardous waste”, with accumulation start dates, and with an indication of the nature of its hazard.

Contingency Plan

At the time of the inspection, the Facility was not able to provide its Contingency Plan but did provide the arrangements made with local response agencies. The agencies where arrangements were made are the following: Ryder Memorial Hospital, San Pablo Hima Hospital, Oriente Hospital, State and Municipal Police Department, and with the State and Municipal Emergency Management offices. As of May 9, 2024, the Contingency Plan has not been provided.

Quick Reference Guide

At the time of the inspection, the Facility was not able to provide its Quick Reference Guide. As of May 9, 2024, this document has not been provided.

Personnel Training – Job Descriptions – Duties – Education/Qualifications

Mr. Cintron stated that all the personnel related records were handled by the Human Resources department. The hazardous waste training program (i.e., job titles, job descriptions, duties, amount of introductory and continuing training required), and the RCRA hazardous waste training for Mr. Victor Vega, Plant Manager, Manuel Gonzalez, Paint Area Supervisor, and Jose Pagan, Wash Area Supervisor (all are associated with the hazardous waste at the Facility) were requested. These records were requested for calendar years 2021, 2022, and 2023.

As of May 9, 2024, these documents have not been provided.

Manifests

The hazardous waste manifests had proper land disposal restriction notification forms based on the shipped waste codes, were dated, and signed by the designated facility, and were processed into EPA's Hazardous Waste Electronic Manifest System (e-Manifest). For a list of hazardous waste shipments completed from 2021 through 2024, see Appendix B.

In 2021, the Facility shipped approximately 32,834 kilograms of non-acute hazardous waste. In 2022, it shipped approximately 20,735 kilograms of non-acute hazardous waste. In 2023, the Facility shipped approximately 35,621 kilograms of non-acute hazardous waste. So far, in 2024, the Facility has shipped approximately 2,651 kilograms of non-acute hazardous waste.

Thus, based on the manifests reviewed for the past three years, and conversations with the Facility representatives, it appears that the Facility routinely generated more than 1,000 kg per month of hazardous waste. Consequently, the Facility appears to be correctly classified as an LQG.

The following table summarizes the amount of non-acute hazardous waste the Facility shipped by calendar year.

Manifest Year	Acute?	Amount of Waste (kg)
2021	Non-Acute	32,834
2022	Non-Acute	20,735
2023	Non-Acute	35,621
2024	Non-Acute	2,651

Aluminios de PR LLC ships its hazardous waste normally every two (2) months.

Biennial Report

The Facility provided proof of its Biennial Report submission dated March 1, 2024. Due to more than a ten (10) percent difference in the amount of waste shipped for calendar year 2023 (RCRAInfo vs Biennial Report), the submission was rejected by the system.

Verifying with the hazardous waste manifests on-site, the report submitted by Mr. Cintron is accurate. The amount of hazardous waste shipped for two (2) manifests were not entered correctly in e-Manifest. The hazardous waste manifests with tracking number 002066141VES and 002066142VES shipped on July 10, 2022, have total shipments totaling 400 kilograms of hazardous waste and 3,571 kilograms of hazardous waste respectively, while e-Manifest is showing shipments totaling 1,725 kilograms of hazardous waste and 19,764 kilograms of hazardous waste respectively.

The Facility has been in contact with Ms. Camille Velez from PR DNER to fix the discrepancy that was noted in the "Manifests" sub-section of the report, and to re-submit the Biennial Report. The report was resubmitted on May 6, 2024, based on the record Mr. Cintron provided electronically on May 8, 2024.

5 CLOSING CONFERENCE

On April 24, 2024, after completion of the walkthrough and onsite document review, I met with facility representative Mr. Cintron to conduct a closing conference. I indicated that the purpose of the closing conference was to inform the Facility about the CEI observations and the opportunity to clarify any questions or doubts the representatives might have pertaining the RCRA inspection. I also communicated that a CEI report would be emailed once finalized.

6 POTENTIAL AREAS OF CONCERN

Based on observations made during the walkthrough of the Facility and/or a review of records provided to EPA by the Facility on-site and/or afterwards, the following potential areas of concern were identified:

REGULATORY, STATUTORY OR PERMIT REFERENCE	FIELD OBSERVATION
RCRA Subtitle C – Hazardous Waste	
40 CFR § Part 262.252(d) : Provides adequate water supply for fire control equipment.	The central accumulation area lacked automatic sprinklers, water spray systems, foam producing equipment, and/or adequate water volume and pressure to supply water hose streams.
40 CFR § Part 262.260(a) : A large quantity generator must have a contingency plan.	The Facility did not provide a Contingency Plan at the time of the inspection nor by the requested due date of May 8, 2024.
40 CFR § Part 262.262(b) : Prepares a quick reference guide and submits it to emergency response agencies.	The Facility did not provide a Quick Reference Guide at the time of the inspection nor by the requested due date of May 8, 2024.
40 CFR § Part 262.17(a)(7)(iii) : Facility personnel must take part in an annual review of the initial training.	The Facility did not provide the personnel training records for Mr. Vega, Mr. Gonzalez, and Mr. Pagan by the requested due date of May 8, 2024.

Note, the documents from Section 4 that have not been provided are required to evaluate the full regulatory and compliance status of the Facility.

7 ENVIRONMENTAL ASSISTANCE

Based on the observations made during the inspection, the Facility can consider the following resources to increase their understanding and compliance with applicable environmental requirements and/or go 'beyond compliance' to reduce its overall environmental footprint:

- [Final Rule: Hazardous Waste Generator Improvements | US EPA](#),
- [National Compliance Assistance Centers](#),
- [Hazardous Waste Portal - Compliance Assistance for Hazardous Waste Generators \(hazwasteportal.org\)](#),
- [Hazardous Waste Requirements for Large Quantity Generators \(LQGs\) \(epa.gov\)](#),
- [U.S. EPA Small Business Resources Information Sheet](#),
- [Surface Technology Environmental Resource Center - STERC](#), and
- [Paints & Coatings Resource Center \(paintcenter.org\)](#).

8 APPENDICES

- A. Inspection Photographs
- B. Hazardous Waste Manifests
- C. EJSscreen Report
- D. Flood Zone Map

Appendix A: Inspection Photos



Photograph One (1): Outside Overview of the Paint Room SAA



Photograph Two (2): Hazardous Waste signage at the CAA



Photograph Three (3): 4 55-gallon drums of liquid waste paint in the CAA



Photograph Four (4): 4 55-gallon drums of solid waste paint in the CAA



Photograph Five (5): 3 55-gallon drums of caustic sludge in the CAA



Photograph Six (6): Fire Extinguisher in the CAA



Photograph Seven (7): Eye Wash Station in the CAA

Appendix B: Hazardous Waste Manifests

Manifest Date	Waste (kg)	Manifest Tracking Number
1/10/2024	1,652	002066660VES
1/10/2024	414	002066661VES
1/10/2024	586	002066660VES
11/13/2023	1,678	002066431VES
11/13/2023	697	002066430VES
11/13/2023	1,015	002066431VES
9/28/2023	3,791	002065946VES
9/28/2023	367	002065948VES
9/28/2023	1,345	002065946VES
7/10/2023	16,580	002066142VES
7/10/2023	1,725	002066141VES
7/10/2023	1,378	002066142VES
5/3/2023	2,478	002068105VES
5/3/2023	364	002068106VES
5/3/2023	971	002068105VES
2/28/2023	1,881	002065664VES
2/28/2023	681	002065663VES
2/28/2023	670	002065664VES
12/9/2022	3,495	002064411VES
12/9/2022	290	002069997VES
12/9/2022	1,553	002064411VES
8/2/2022	2,084	002064313VES
8/2/2022	341	002064314VES
8/2/2022	1,309	002064313VES
8/2/2022	2,994	002069821VES
5/11/2022	2,090	002069690VES
5/11/2022	481	002064263VES
5/11/2022	913	002069690VES
1/14/2022	3,211	002064053VES
1/14/2022	373	002064054VES
1/14/2022	967	002064053VES
1/14/2022	635	002064055VES
10/22/2021	1,925	002065188VES
10/22/2021	187	002065189VES
10/22/2021	3,402	002065190VES
10/15/2021	5,670	002065314VES

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9/17/2021	1,586	002065216VES
9/17/2021	7,938	002065215VES
8/13/2021	3,618	002065110VES
8/13/2021	2,313	002065110VES
5/18/2021	2,536	001656894VES
5/18/2021	640	001656894VES
3/2/2021	2,039	001849345VES
3/2/2021	980	001849345VES

Appendix C: EJScreen Report



EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

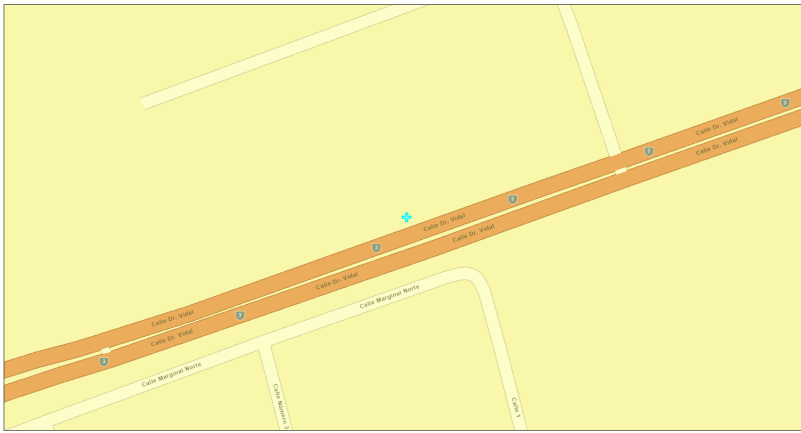
Humacao Municipio, PR

1 mile Ring Centered at 18.146112,-65.797996

Population: 6,528

Area in square miles: 3.14

A3 Landscape



May 13, 2024

Aluminos de PR LLC

0 0.01 0.02 0.03 0.04 0.05 mi
0 0.02 0.04 0.06 0.08 km

EPA: Community Maps Contributors, Esri: TomTom, IGN: Pangea, SAP: SAP, GeoTechnique, Inc. METADATA: USGS, NPS, US Census Bureau, USFWS

COMMUNITY INFORMATION



Low income:
65 percent



People of color:
99 percent



Less than high
school education:
18 percent



Limited English
households:
65 percent



Unemployment:
17 percent



Persons with
disabilities:
9 percent



Male:
51 percent



Female:
49 percent

N/A

Average life
expectancy

\$13,439

Per capita
income



Number of
households:
1,767



Owner
occupied:
84 percent

BREAKDOWN BY RACE



White: 1%



Black: 0%



American Indian: 0%



Asian: 0%



Hawaiian/Pacific
Islander: 0%



Other race: 0%



Two or more
races: 0%



Hispanic: 99%

BREAKDOWN BY AGE



From Ages 1 to 4

1%



From Ages 1 to 18

15%



From Ages 18 and up

85%



From Ages 65 and up

22%

LIMITED ENGLISH SPEAKING BREAKDOWN



Speak Spanish

100%



Speak Other Indo-European Languages

0%



Speak Asian-Pacific Island Languages

0%



Speak Other Languages

0%

LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	6%
Spanish	94%
Total Non-English	94%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

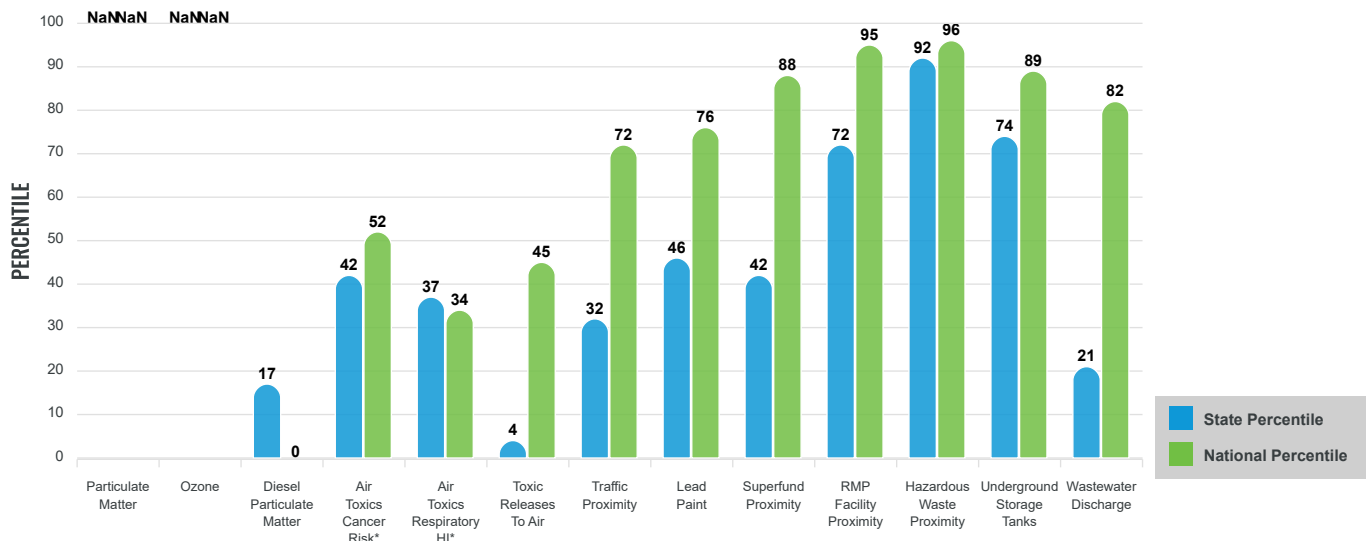
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

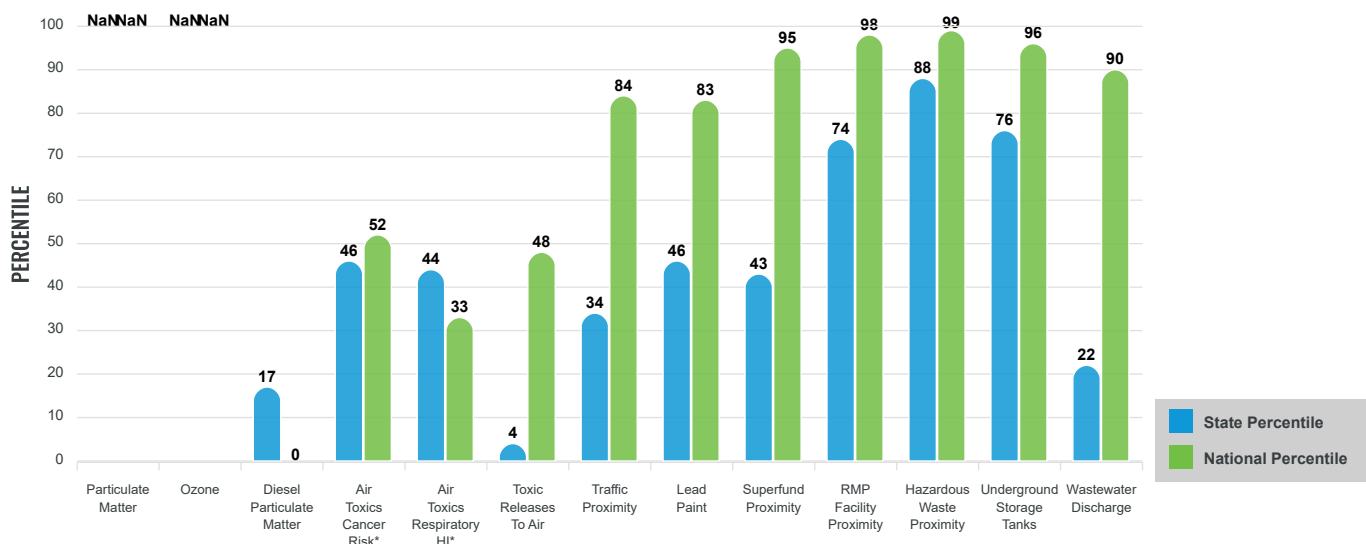
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for 1 mile Ring Centered at 18.146112,-65.797996

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter ($\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	8.08	N/A
Ozone (ppb)	N/A	N/A	N/A	61.6	N/A
Diesel Particulate Matter ($\mu\text{g}/\text{m}^3$)	0.0177	0.0667	18	0.261	0
Air Toxics Cancer Risk* (lifetime risk per million)	20	20	15	25	5
Air Toxics Respiratory HI*	0.2	0.19	0	0.31	1
Toxic Releases to Air	24	4,300	3	4,600	13
Traffic Proximity (daily traffic count/distance to road)	47	180	40	210	38
Lead Paint (% Pre-1960 Housing)	0.089	0.16	48	0.3	33
Superfund Proximity (site count/km distance)	0.069	0.15	41	0.13	54
RMP Facility Proximity (facility count/km distance)	0.48	0.47	72	0.43	75
Hazardous Waste Proximity (facility count/km distance)	2.6	0.76	94	1.9	79
Underground Storage Tanks (count/km ²)	2.2	1.7	75	3.9	60
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.00041	2.3	22	22	41
SOCIOECONOMIC INDICATORS					
Demographic Index	82%	83%	32	35%	96
Supplemental Demographic Index	41%	43%	38	14%	98
People of Color	99%	96%	27	39%	96
Low Income	65%	70%	32	31%	91
Unemployment Rate	17%	15%	65	6%	93
Limited English Speaking Households	65%	67%	38	5%	99
Less Than High School Education	18%	21%	44	12%	78
Under Age 5	1%	4%	0	6%	13
Over Age 64	22%	22%	51	17%	73
Low Life Expectancy	N/A	N/A%	N/A	20%	N/A

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	2
Water Dischargers	15
Air Pollution	2
Brownfields	0
Toxic Release Inventory	5

Other community features within defined area:

Schools	1
Hospitals	0
Places of Worship	0

Other environmental data:

Air Non-attainment	No
Impaired Waters	Yes

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

Report for 1 mile Ring Centered at 18.146112,-65.797996

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	N/A	N/A	N/A	20%	N/A
Heart Disease	N/A	N/A	N/A	6.1	N/A
Asthma	N/A	N/A	N/A	10	N/A
Cancer	N/A	N/A	N/A	6.1	N/A
Persons with Disabilities	8.9%	21.6%	4	13.4%	25

CLIMATE INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	N/A	N/A	N/A	12%	N/A
Wildfire Risk	N/A	N/A	N/A	14%	N/A

CRITICAL SERVICE GAPS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	34%	32%	58	14%	92
Lack of Health Insurance	5%	7%	40	9%	40
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	No	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Report for 1 mile Ring Centered at 18.146112,-65.797996

Appendix D: Flood Zone Map

Federal Emergency Management Agency (FEMA) 100 Year Flood Zones and EPA's Region 2 Composite Flood Risk Layer

Facility Name: Aluminios de Puerto Rico LLC



The Facility is located within the FEMA 100-Year Flood Zones layer.



The Facility is located within a flood potential risk area based on EPA's Region 2 Composite Flood Risk layer.