



EPA REGION 2  
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION

September 18, 2024

**VIA EMAIL**

Mr. Raymond González  
Print 1 LLC  
Road PR-183 Km. 20 Bo. Montones  
Las Piedras, Puerto Rico, 00771.  
[rayzx14rr@gmail.com](mailto:rayzx14rr@gmail.com)

**RE: RCRA § 3007 – REQUEST FOR INFORMATION  
RCRA § 3008 – NOTICE OF VIOLATION  
Facility Name: Print 1 LLC  
EPA ID: PRR000026260  
CEPD-RCRA-24-3007-3008-016**

Dear Mr. González:

The U.S. 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 (HSWA) of 1984, 42 U.S.C. § 6901, 6928. Pursuant to RCRA, as amended by HSWA, EPA promulgated rules, regulations, and standards governing the handling and management of hazardous waste as set forth in 40 C.F.R. Parts 260-272. For the purposes of this Request for Information (RFI) and Notice of Violation (NOV), the hazardous waste rules were promulgated in 1980 and amended by HSWA in 1984.

The Commonwealth of Puerto Rico is not authorized by the EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926, and is not authorized to enforce RCRA. The EPA has retained its authority to enforce the hazardous waste rules and regulations in the Commonwealth of Puerto Rico.

The NOV portion of this letter (**Enclosure I**) is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by RCRA and HSWA, 42 U.S.C. §§ 6901, 6928. Issuance of this NOV and compliance with its terms does not preclude EPA from taking formal enforcement action against you and/or your company, including a monetary penalty, under Section 3008 of RCRA, 42 U.S.C. § 6928, or any other applicable regulation or statute.

If you have not already done so, you must take immediate action to correct the violations described in Enclosure I. Please submit, within thirty (30) days of the receipt of this letter, a response which includes (1) a description of the actions you have taken to correct the violations noted in Enclosure I,

(2) documentation that the violations have been corrected, and (3) a description of the procedures that will be put into place to prevent such violations from occurring in the future. For consistency, please provide your answers in a format which is keyed to the sections as outlined in Enclosure I to this letter.

This RFI 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 II to this letter using the instructions and definitions included in Enclosure III. This information is required to evaluate the full regulatory and compliance status of the facility. The response to Enclosure IV must be signed by a responsible official or agent of your facility, using the form in Enclosure IV to this letter.

Failure to respond to Enclosures I and II 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, civil judicial or criminal action. This information 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 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.

Your response to the information request in Enclosures I and II must be sent through email to the following email address [caballer.rosana@epa.gov](mailto:caballer.rosana@epa.gov), and can also be mailed to the following address:

Rosana Caballer-Cruz, Enforcement Officer  
Response and Remediation Branch  
Caribbean Environmental Protection Division  
US Environmental Protection Agency  
City View Plaza II, Suite 7000  
#48 PR-165 Km 1.2 Guaynabo, Puerto Rico 00968-8069

If you have any questions or need any additional information, please contact me at 787-977-5865 or [guerrero.carmen@epa.gov](mailto:guerrero.carmen@epa.gov) or have your staff contact Rosana Caballer-Cruz at [caballer.rosana@epa.gov](mailto:caballer.rosana@epa.gov) or (787) 977-5880.

Sincerely,

**HECTOR  
VELEZ-CRUZ**

Digitally signed by  
HECTOR VELEZ-CRUZ  
Date: 2024.09.18  
11:00:43 -04'00'

Carmen R. Guerrero Pérez  
Director

ENCLOSURES

1. RCRA § 3008 Notice of Violation
2. RCRA § 3007 Request for Information
3. Instructions and Definitions
4. Certification of Answers to Responses

cc: Mr. Rodolfo Albizures, Quality Control Supervisor  
[rodolfo@print1pr.com](mailto:rodolfo@print1pr.com)

Mr. Jose Martinez, Facility Environmental Consultant  
[jmartinez.ehsconsultant@gmail.com](mailto:jmartinez.ehsconsultant@gmail.com)

Mr. David N Cuevas Miranda, Supervisor USEPA,  
[cuevas.david@epa.gov](mailto:cuevas.david@epa.gov)

## ENCLOSURE I – RCRA § 3008 NOTICE OF VIOLATION

On August 20, 2024, a duly authorized representative of EPA conducted a Resource Conservation and Recovery Act (RCRA) Hazardous Waste Compliance Evaluation Inspection (CEI) of Print 1 LLC, located at Road PR-183 Km. 20 Bo. Montones, Las Piedras, 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.

### 1. 40 CFR § 262.262(a)

40 CFR § 262.262(a) states *“A copy of the contingency plan and all revisions to the plan must be maintained at the large quantity generator and— (a) The large quantity generator must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services). This document may also be submitted to the Local Emergency Planning Committee, as appropriate.”*

The facility failed to comply with this requirement. As part of the inspection, the document was requested to be sent, via email on a later date, in order to be evaluated. Although the Integrated Contingency Plan was sent as agreed, the latter seems to be a draft document. Furthermore, information related to the copies provided to all local emergency responders, as required by this Citation, was not available.

### 2. 40 CFR § 273.13(d)(1)

40 CFR § 273.13(d)(1) states *“A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions”.*

The facility failed to comply with this requirement. One (1) 4-ft square cardboard box with approximately five (5) fluorescent lamps was observed open.

### 3. 40 CFR § 273.14(e)

40 CFR § 273.14(e) states *“Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”.*

The facility failed to comply with this requirement. One (1) 4-ft square cardboard box with approximately five (5) fluorescent lamps was not labeled or marked clearly with one of the phrases provided in this Citation.

## ENCLOSURE II– RCRA § 3007 REQUEST FOR INFORMATION

On or about August 20, 2024, a duly authorized representative of EPA conducted a RCRA Hazardous Waste Compliance Evaluation Inspection of the Print 1 LLC (the Facility) at Road PR-183 Km. 20 Bo. Montones, Las Piedras, Puerto Rico, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. Based on the information obtained during the inspection, EPA determined that the following information is required to determine the compliance status of the Facility.

### 1. General Information

- a. Provide the full legal name of Print 1 LLC. If the company has used any other names, please provide them.
- b. Provide the management structure of the company (President/Owner, Partners, General Manager, etc.). If the company is a subsidiary, indicate the parent company.
- c. Provide the type of company (corporation, partnership, etc.), employer identification number, Department of State certificate number, DUNS number, and business licenses, if any.
- d. Besides the EPA inspection performed on or about August 20, 2024, please provide information about any other inspection conducted by any other State or Federal agency, since 2019.
- e. 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 Print 1 LLC? If yes, explain and elaborate your answers.
- f. Please certify if Print 1 LLC has filed for bankruptcy at any time under its current or any previous name.

### 2. Specific Information

- a. Drum crusher/compactor equipment
  - i. As part of the inspection activity, additional information related to the drum crusher/compactor equipment observed inside the 90-day hazardous waste accumulation area was requested.
  - ii. Please provide a narrative with information related to, but not limited to how this equipment is used, what type of containers are compacted at this equipment, if these containers have been used to store hazardous waste, cleaning process, how these containers have been classified (hazardous,

non-hazardous, etc.) and how these containers are being disposed of, among others.

iii. Additionally, please provide information related to the hazardous waste determination conducted, if any, to this waste stream.

iv. Also, please include the name/model of the equipment and, if possible, a general picture of it.

b. Satellites Accumulation Area (SAA)

i. As part of the inspection activity, information related to the quantity of SAAs available at the facility were provided. It was discussed that some SAAs would be eliminated from the facility, and some would be remained.

ii. Please provide information related to, but not limited to current quantity of SAAs available at the facility, location of the SAAs, wastes handled at those SAAs, among others.

## **ENCLOSURE III – 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 IV**).
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 Print 1 LLC at Road PR-183 Km. 20 Bo. Montones, Las Piedras, Puerto Rico.
11. A generator of hazardous waste for the purposes of this Request for Information shall be defined 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. Solid waste shall be defined for the purposes of this Request for Information as that term is defined in Section 1004(27) of RCRA, as amended, 42 U.S.C. Part 6903(27).
13. Hazardous waste shall be defined for the purposes of this Request for Information as that term is defined in Section 1004(5) of RCRA, as amended, 42 U.S.C. Part 6903(5).
14. Manage shall be defined for the purposes of this Request for Information as to market, generate, treat, store, dispose or otherwise handle.
15. 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 IV – Certification of Answers to Responses

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information CEPD-RCRA-24-3007-3008-016) 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)

Print 1 LLC

EPA ID: PRR000026260