EPA REGION 2
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION

January 31, 2024

Via Electornic Mail

Javier Ramis
Director of Operations
Hamilton Sundstrand de Puerto Rico, Inc.
Felicia Industrial Park PR-576 Km 0.7
Santa Isabel, Puerto Rico 00757
javier.ramis@collins.com

RE: **RCRA § 3008 – NOTICE OF VIOLATION**
Facility Name: Hamilton Sundstrand de Puerto Rico, Inc.
EPA ID: PRD987380078
CEPD-RCRA-24-0000-3008-005

Dear Mr. Ramis:

The U.S. Environmental Protection Agency (EPA) is charged with the protection of human health and the environment under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901, et seq. Pursuant to RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), EPA promulgated rules, regulations, and standards governing the handling and management of hazardous waste as set forth in 40 Code of Federal Regulations (C.F.R.) Parts 260-272. For the purposes of this Notice of Violation (NOV), the hazardous waste regulations governing the generation of hazardous waste 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 and to enforce RCRA under Section 3006 of RCRA, 42 U.S.C. § 6926.

On or about January 10, 2024, a duly authorized representative of the EPA conducted a Compliance Evaluation Inspection (CEI) of Hamilton Sundstrand de Puerto Rico Inc., located in Santa Isabel, Puerto Rico, (the "Facility") pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. As a result of the CEI, the EPA representative found the Facility in violation of 40 C.F.R. §§ 262.262(a), 262.262(b), and 262.263(d) of the RCRA Regulations.

This Notice of Violation (Enclosure II) is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by RCRA and HSWA, 42 U.S.C. §§ 6901 and 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 II. Please submit, within thirty (30) days of the receipt of this letter via electronic mail, a response which includes (1) a description of the actions you have taken to correct the violations noted in Enclosure II, (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 II to this letter.

Your response to this NOV can be sent through email to the following email address colombani.carlos@epa.gov and can also be mailed 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

Failure to respond in full to the above requirements may result in federal enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, including the assessment of a monetary penalty. If you have any questions regarding this matter, please contact Mr. Carlos J. Colombani, from my staff, at 787-977-5862 or via e-mail at colombani.carlos@epa.gov.

Sincerely,

HECTOR VELEZ-CRUZ

Digitally signed by HECTOR VELEZ-CRUZ
Date: 2024.01.31 22:05:12 -04'00'

Héctor L. Vélez Cruz, Esq.
Acting Director

Enclosures:

I. Compliance Evaluation Inspection Report
II. Notice of Violation

cc: Lorna Rodríguez, Chief
Hazardous Waste Enforcement Program
Puerto Rico Department of Natural & Environmental Resources
8838 Street, Km 6.3, Sector El Cinco
Rio Piedras, PR 00936
lornarodriguez@drna.pr.gov