



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA II BUILDING, 7TH FLOOR
ROUTE 165 GUAYNABO, PUERTO RICO 00968

August 8, 2023

SENT VIA EMAIL:

Pall Life Sciences Puerto Rico LLC
STATE ROAD 194 KM. 0.4
FAJARDO, 00738
C/O: Ms. Jalixa Díaz
Emails: jalixa_diaz@pall.com; natalia_perez@pall.com

RE: RCRA § 3008 – NOTICE OF VIOLATION
Pall Life Sciences Puerto Rico LLC
EPA ID: PRD981139611
CEPD-RCRA-23-0000-3008-006

Dear Ms. Jalixa Díaz:

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 March 16, 2023, a duly authorized representative of the EPA conducted a Compliance Evaluation Inspection (CEI) of the Pall Life Sciences Puerto Rico LLC., located in Fajardo, Puerto Rico, (the "Facility") pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. As a result of the CEI, EPA representative found the Facility in violation of §§ 40 CFR § 262.17(a)(1)(ii), 40 CFR 262.17(a)(1)(vii)(C), 40 CFR § 262.17(a)(5)(i)(A), 40 CFR § 262.17(a)(5)(i)(B), and 40 CFR 262.262(b) of the RCRA Regulations.

This Notice of Violation (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 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 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 violation noted in Enclosure I, (2) documentation that the violation has been corrected, and (3) a description of the procedures that will be put into place to prevent such violation 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.

Your response to this NOV can be send through email to the following email address caballer.rosana@epa.gov and can also be mailed to the following address:

Rosana Caballer-Cruz, 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 Ms. Rosana Caballer-Cruz, from my staff, at 787-977-5880 or via e-mail at caballer.rosana@epa.gov.

Sincerely,

**CARMEN
GUERRERO
PEREZ**

Carmen R. Guerrero Pérez
Director

 Digitally signed by
CARMEN GUERRERO PEREZ
Date: 2023.08.08 13:56:14
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Enclosures: Enclosure I - Notice of Violation

cc: Ms. Lorna Rodríguez, RCRA Enforcement Section Chief
Puerto Rico Dept. Natural & Environmental Resources