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September 2, 2025

SEP 0 9 2025

September 10, 2025 11:50 A.M. U.S. EPA REGION IX HEARING CLERK

Regional Hearing Clerk
Office of Regional Counsel (ORC-I)
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
TU.Ponly@epa.gov

This responds to your letter received by Unitek in early August 2025.

The solvent in question, according to Unitek's test results, did not constitute hazardous waste. Moreover, the solvents were being legitimately recycled and/or destined for legitimate recycling in compliance with EPA's standards, regulations, and guidance documents accordingly.

Even if the solvent in question exhibited a hazardous characteristic, which we deny, it was properly recycled and therefore did not constitute a RCRA hazardous waste.

To adequately prepare Unitek's defense, we will need to obtain, and therefore respectfully request, all documents including, but not limited to, all test results and inspection materials.

We also request a hearing to contest the alleged violations.

Sincerely.

Mulain Apl

President