

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

In the Matter of

Aguakem Caribe, Inc.

**Respondent**

**Prehearing Exchange**

Docket No. RCRA-02-2009-7110

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
2010 NOV -3 P 12:32  
REGIONAL HEARING  
CLERK

**COMPLAINANT'S SUPPLEMENTAL PREHEARING EXCHANGE**

Complainant through the undersigned attorney hereby supplements its Initial Prehearing Exchange for the above-captioned matter as follows:

Set of 13 Color Photos substituting the black and white photos part of Complainant's Exhibit 3, RCRA Compliance Evaluation Inspection, Port of Ponce Authority, Attachment III.

Respectfully submitted, in San Juan, Puerto Rico, on November 2, 2010.

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CERTIFICATE OF SERVICE

I certify that I have this day caused to be sent the foregoing Complainant's Supplemental Prehearing Exchange dated November 2, 2010, and bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and copy by UPS to:

Karen Maples  
Regional Hearing Clerk  
Region 2  
U.S. Environmental Protection Agency  
290 Broadway, 17<sup>th</sup> Floor  
New York, NY 10007-1866.

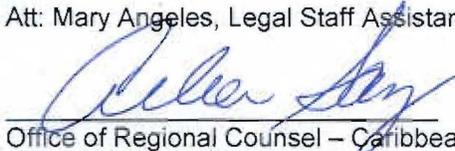
Copy by UPS to:

Attorney for Respondent:  
Armando Llorens, Esq.  
FURGANG & ADWAR  
1325 Avenue of the Americas, 28<sup>th</sup> Floor  
New York, New York 10019  
[Phone: (212) 725-1818]

Copy by UPS to:

Administrative Law Judge:  
The Honorable Barbara A. Gunning  
Office of Administrative Law Judges  
U.S. Environmental Protection Agency  
Franklin Court Building  
1099 14<sup>th</sup> Street, N.W., Suite 350  
Washington, D.C. 20005  
[Phone: (202) 564-6255 Att: Mary Angeles, Legal Staff Assistant]

11/2/2010  
Date

  
Office of Regional Counsel – Caribbean Team



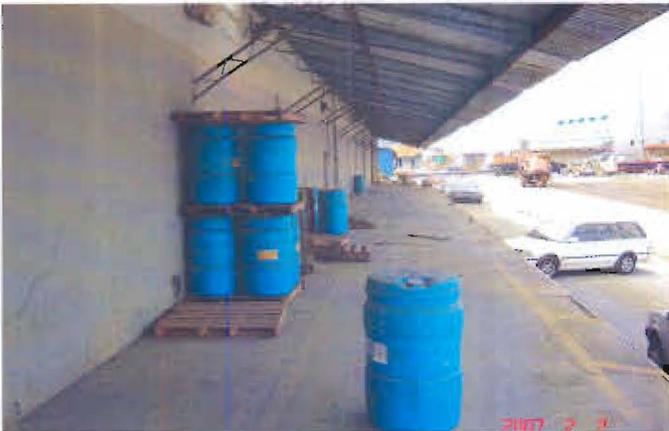
1. View of facility-Building #6.



2. Concrete containment unit located at the north-west section of the facility.



3. Stormwater catch basin obstructed by 150 yd<sup>3</sup> container labeled as FERROUS CHLORIDE and garbage.



4. Empty drums at the loading/unloading dock of the building (North).



5. Concrete ditch at the south side of the facility.



6. View of stacked 150 yd3 containers located at the north side of the facility.



7. Stacks of 150 yd3 tanks.



8. Partial view of the southeast side of the facility.



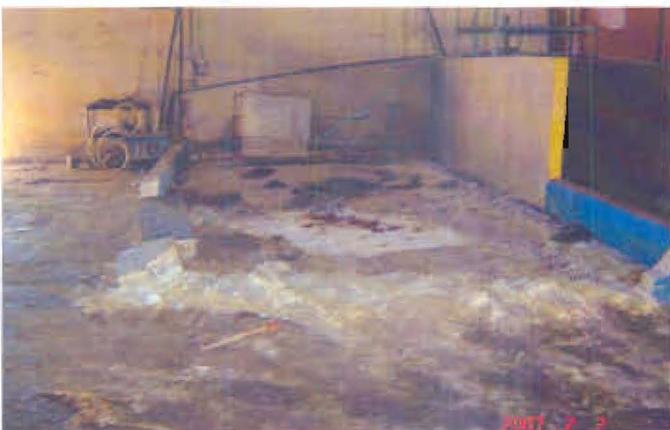
9. Unidentified 1yd3 container with its top portion removed.



10. Unidentified 1 yd3 container.



11. Demolished structure and related debris that were found at the south-central section of the facility.



12. White granular material spreaded on the surface of a partially demolished secondary containment unit.



*13. Yellow-brown granular material at secondary containment unit.*