

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR**

IN THE MATTER OF:

Homeca Recycling Center Co., Inc.

Respondent

Docket No. CAA-02-2024-1201

**RESPONDENT'S UPDATED INDEX OF EXHIBITS**

Respondent's Exhibit <sup>(1)</sup>	Description of Exhibit
RX 1	Photos of the Work Area at TIP
RX 2	Aerial photo of CORCO Petrochemical Complex
RX 3	Aerial photo of TIP and Work Area
RX 4	Photos of work performed inside Work Area
RX 5	Aerial video of Work Area taken in 2021, after Respondent's work completed <sup>(2)</sup>
RX 6	Examples of ACM Abatement Permits issued by the state agency
RX 7	EPA-Weston Report on background asbestos
RX 8	Report on Other Sources of Asbestos Chrysotile Structures Along PR-2, dated July 2014, by The Atmospheric Assessment Group, and EPA's Technical Review dated November 6, 2014 by Chuck Nace, Environmental Toxicologist, EPA, Region II
RX 9	Analytical Environmental Services International, Inc. (AESI) Report of Initial Fingerprinting Related to Puerto Rico Olefin February 2015, by Ady Padan, Ph. D
RX 10	Presentation of Fingerprinting Report to EPA
RX 11	May 29, 2015 EPA letter on Initial Fingerprinting Findings, PR Olefin Site, Peñuelas, PR, by Chloe Metz, Chief, Technical Support Section, Emergency and Remedial Response Division, EPA, Region 2

Respondent's Exhibit <sup>(1)</sup>	Description of Exhibit
RX 12	July 10, 2015 US DOJ ENRD letter (CAMP)
RX 13	September 18, 2015 Work Plan (same as CX#13)
RX 14	October 2, 2015 EPA's Work Plan approval letter (same as CX#14)
RX 15	June 4, 2017 Environmental Wipe Sampling Assessment
RX 16	Transportation and Disposal Manifests for ACM from the TIP Project
RX 17	Daily Logs for the TIP Project
RX 18a <sup>(3)</sup>	Air monitoring records for the TIP Project (pages 1 to 400)
RX 18b <sup>(3)</sup>	Air monitoring records for the TIP Project (pages 401 to 600)
RX 18c <sup>(3)</sup>	Air monitoring records for the TIP Project (pages 601 to 823)
RX 19 <sup>(4)</sup>	Respondent's Income Statement 2023 (redacted)
RX 20	Photos for re-bagging activities after EPA July 31, 2019 inspection
RX 21	Notification for disposal of ACM after June 30, 2021 inspection
RX 22	Draft AOC and photos for the rest of the TIP site
RX 23	Removal Action Work Plan for rest of TIP site
RX 24	February 5, 2021 notification to EPA on completion of the Work Plan (same as CX 70)
RX 25	Tallaboa, Peñuelas Climate Temperature Data for July 2019

- (1) Some exhibits had been previously labeled with exhibits numbers because they were used at different stages prior to this case and for unrelated purposes. There are others that were bates stamped with page numbers. These numbers are to be ignored, as the correct exhibit identification numbers for this case are those prefixed with "RX" and inserted at the bottom-right location on each page.
- (2) The video could not be stamped with its RX 5 identification number.
- (3) Due to the size of the RX 18 electronic file which exceeds the file size limit, it had to be divided into three smaller files, identified as RX 18 a, 18b and 18c.
- (4) An unredacted version of RX 19 is not submitted since only the previous year's net income, that is 2023, is considered in the federal Circuit Appeals Court case cited in the Respondent's ability to pay argument.