

**REGION 9**

SAN FRANCISCO, CA 94105

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 5, 2025

Ho Nin Au Yeung, General Partner
AY-NC LP

Exemption 6: privacy

Archibald M. Sam
Agent for AY-NC LP
500 Sansome Street
San Francisco, CA 92111

Re: Notice of Intent to Perfect Lien
850 I Street, Reedley, California
Assessor Parcel Number ("APN") 368-010-64ST
Universal Meditech, Inc. Superfund Site, Reedley, Fresno County, California

Dear Ho Nin Au Yeung, General Partner of AY-NC LP:

This letter informs you that the United States Environmental Protection Agency ("EPA") intends to perfect a lien upon property located at 850 I Street in Reedley, California (APN 368-010-64ST) (the "Property"), the exact legal description of which is contained in the attachment to this letter ("Grant Deed"). The Property is part of the Universal Meditech, Inc. Superfund Site (the "Site"). EPA has determined that AY-NC LP is the owner of the Property. Our information indicates AY-NC LP is a limited partnership registered in California, and that Ho Nin Au Yeung is a General Partner.

The lien which EPA intends to perfect against the Property arises under Section 107(l) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), commonly known as the "Superfund," 42 U.S.C. § 9607(l). The lien is intended to secure payment to the United States of costs and damages for which AY-NC LP, as the owner of the Property, would be liable to the United States under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).

Under CERCLA Sections 107(a) and 101(9), 42 U.S.C. §§ 9607(a) and 9701(9), liable persons include persons who own any "facility," including a site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located. EPA has determined that a release or threat of release of hazardous substances pursuant to CERCLA Section 101(22) has occurred

at or from the Property. The Property is part of the Site, at which hazardous substances came to be located, including contamination resulting from abandoned laboratory chemicals, and is subject to or affected by a removal or remedial action. As the owner of a facility, AY-NC LP is liable for all costs of removal or remedial action at the Site. Costs and damages include the costs incurred by the United States in responding to a release or threat of release at the Site.

EPA has incurred response costs under its CERCLA authority and will continue to incur costs that are recoverable from potentially responsible parties. Such costs include, but are not limited to, expenditures for investigation, planning, response, enforcement activities, oversight of response actions that are performed by parties other than EPA or its contractors, operation and maintenance of monitoring systems, and any accrued interest. EPA has incurred at least \$272,843.86 in costs for response actions related to the Site. The amount of the lien arising in favor of the United States on the Property will increase, however, as the Agency continues to incur costs related to the Site. The lien arising in favor of the United States on the Property continues until the liability for the costs is satisfied or until the liability for the costs becomes unenforceable, including through operation of the statute of limitations in Section 113 of CERCLA.

EPA hereby furnishes notice of your potential liability under CERCLA. You may avoid the perfection of a lien upon the property by paying all costs and damages for which you are liable. EPA has assembled a Lien Filing Record consisting of documents relating to its decision to perfect the lien. This record is kept at the following address, and may be reviewed and copied at reasonable times by arrangement with:

Jon Owens, Esq. (Attorney-Advisor)
EPA Office of the Regional Counsel
Owens.Jon@epa.gov
415-972-3620

EPA has reviewed the information in the Lien Filing Record and believes that the Agency has a reasonable basis to believe that the statutory elements for perfecting a lien are satisfied. After 14 calendar days from the date of this letter, EPA intends to transmit a notice of lien to the Fresno County Recorder's Office. The effect of this filing is to perfect the lien upon your property.

You may notify EPA within 14 calendar days from the date of mailing of this letter in writing if you believe EPA's information or determination is in error. You may also request to appear before a neutral EPA official to present any information that you have indicating that EPA does not have a reasonable basis to perfect a lien. You should describe in your letter or written request your reasons for believing that EPA does not have a reasonable basis to perfect its lien, because EPA may, as described below, agree with your reasons and reconsider its intention to perfect a lien without further review or a meeting. Any written submissions or requests for a meeting should reference the Superfund Site, be addressed to the above referenced Regional Attorney, and may include documents or information which support your contentions.

If EPA receives a written submission or a request for a meeting from you within 14 calendar days from the date of mailing of this letter, Agency staff will review your submission or request for a

meeting. If, after review and consultation, EPA agrees that the Agency does not have a reasonable basis upon which to perfect a lien, EPA will not perfect its lien, and will so notify you. If EPA disagrees, the written submission or request will be referred to a neutral EPA official selected for the purpose of reviewing the submission or for conducting the meeting, along with the Lien Filing Record.

If you have requested an opportunity to appear, a meeting will be scheduled. You may choose to attend this meeting via teleconference. The Agency will be represented by its enforcement staff, including a representative from the Office of Regional Counsel. You may be represented by counsel at this meeting.

The meeting will be an informal hearing in which you may provide EPA with information as to why the Agency's assumptions require reconsideration. The meeting will not be conducted using rules of evidence or formal administrative or judicial procedures. The sole issue at the meeting would be whether EPA has a reasonable basis to perfect a lien based upon CERCLA Section 107(I).

After reviewing your written submissions, or conducting a meeting, if one is requested, the neutral EPA official will issue a recommended decision based on the Lien Filing Record. The recommended decision will state whether EPA has a reasonable basis to perfect the lien and will be forwarded to the Agency official delegated to execute liens for action. You will be notified of the Agency's action (whether perfection or the decision not to perfect) and furnished a copy of the recommended decision.

Neither you nor EPA waives or is prohibited from asserting any claims or defenses in any subsequent legal or administrative proceeding by the submission of information, a request for and participation at a meeting, or recommended decision by the neutral EPA official that EPA has a reasonable basis to perfect a lien.

If you have any questions pertaining to this letter, please contact Jon Owens, Esq. in the Office of Regional Counsel at owens.jon@epa.gov or (415) 972-3620.

Sincerely,

LYNN KELLER

Digitally signed by LYNN
KELLER
Date: 2025.08.05 09:46:49
-07'00'

Lynn Keller, Acting Assistant Director
Superfund and Emergency Management Division
Emergency Response, Planning and Preparedness
Branch

Attachment: Grant Deed (Legal Description of the Property)

cc: Craig Whitenack, EPA
Jon Owens, EPA