

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
1600 JFK BLVD
Philadelphia, Pennsylvania 19103



In the Matter of: :
:
Southern Galvanizing Company : U.S. EPA Docket No. RCRA-03-2024-0024
1620 Bush Street :
Baltimore, MD 21230 : Proceeding under Section 3008(a) and (g) of the
Respondent. : Resource Conservation and Recovery Act, as
:
Southern Galvanizing Company : amended, 42 U.S.C. § 6928(a) and (g)
1620 Bush Street :
Baltimore, MD 21230 :
Facility. :
:

CONSENT AGREEMENT

PRELIMINARY STATEMENT

1. This Consent Agreement is entered into by the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3 (“Complainant”) and Southern Galvanizing Company (“Respondent”) (collectively the “Parties”), pursuant to Section 3008(a) and (g) of the Resource Conservation and Recovery Act (“RCRA” or the “Act”), as amended, 42 U.S.C. § 6928(a) and (g), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation, Termination or Suspension of Permits (“Consolidated Rules of Practice”), 40 C.F.R. Part 22. Section 3008(a) of RCRA authorizes the Administrator of the U.S. Environmental Protection Agency (“EPA” or the “Agency”) to assess penalties and undertake other actions required by this Consent Agreement. The Administrator has delegated this authority to the Regional Administrator who, in turn, has delegated it to the Complainant. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes the assessment of a civil monetary penalty against any person who violates any requirement of RCRA Subtitle C, EPA’s regulations thereunder, or any regulation of a state hazardous waste program which has been authorized by EPA. This Consent Agreement and the attached Final Order (hereinafter jointly referred to as the “Consent

Agreement and Final Order”) resolve Complainant’s civil penalty claims against Respondent under RCRA for the violations alleged herein.

2. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant hereby simultaneously commences and resolves this administrative proceeding.

JURISDICTION

3. The U.S. Environmental Protection Agency has jurisdiction over the above-captioned matter, as described in Paragraph 1, above.
4. The Consolidated Rules of Practice govern this administrative adjudicatory proceeding pursuant to 40 C.F.R. § 22.1(a)(4).
5. On February 11, 1985, pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), and 40 C.F.R. Part 271, Subpart A, EPA granted the State of Maryland final authorization to administer its hazardous waste management program regulations (“MdHWMR”) set forth at the Code of Maryland Regulations (“COMAR”), Title 10, Subtitle 51 et seq., in lieu of the federal hazardous waste management program established under RCRA Subtitle C, 42 U.S.C. §§ 6921-6939e. Through this final authorization, the provisions of the MdHWMR became requirements of RCRA Subtitle C and are, accordingly, enforceable by EPA on and after that date pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a). EPA authorized revisions to the Maryland hazardous waste management program set forth at COMAR, Title 26, Subtitle 13 effective on July 31, 2001, September 24, 2004, and on October 31, 2016, and, accordingly, the provisions of the revised MdHWMR are enforceable by EPA on and after those dates pursuant to § 3008(a) of RCRA, 42 U.S.C. § 6928(a). Maryland has not sought authorization to implement the federal air monitoring RCRA regulations, commonly known as RCRA Subparts AA, BB, and CC. EPA promulgates the regulations in Subpart AA, BB and CC pursuant to the 1984 Hazardous and Solid Waste Amendments, and those federal regulations apply in Maryland.
6. On August 10, 2021, EPA sent notice to the State of Maryland, through the Maryland Department of the Environment (“MDE”), giving prior notice of this action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

GENERAL PROVISIONS

7. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this Consent Agreement and Final Order.

8. Except as provided in Paragraph 7, above, Respondent neither admits nor denies the specific factual allegations set forth in this Consent Agreement.
9. Respondent agrees not to contest the jurisdiction of EPA with respect to the execution of this Consent Agreement, the issuance of the attached Final Order, or the enforcement of this Consent Agreement and Final Order.
10. For purposes of this proceeding only, Respondent hereby expressly waives its right to contest the allegations set forth in this Consent Agreement and Final Order and waives its right to appeal the accompanying Final Order.
11. Respondent consents to the assessment of the civil penalty stated herein, to the issuance of any specified compliance order herein, and to any conditions specified herein.
12. Respondent shall bear its own costs and attorney's fees in connection with this proceeding.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

13. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant alleges and adopts the Findings of Fact and Conclusions of Law set forth immediately below.
14. Respondent's facility is located at 1620 Bush Street, Baltimore, Maryland 21230 ("Facility"). At the Facility, Respondent conducts a hot dip galvanization process on metal for corrosion protection. The primary waste streams include hydrochloric acid waste, secondary containment liquid (generated from spills and drips during the galvanizing process), aerosol cans and their contents, and acid filter cake waste.
15. Respondent most recently notified as a Large Quantity Generator of hazardous waste ("LQG") on April 21, 2022. The Facility does not have a RCRA permit to treat, store and/or dispose of hazardous waste.
16. Respondent is a corporation organized under the laws of the State of Maryland.
17. Respondent is now and was at the time of the violations alleged herein, a "person" as that term is defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and COMAR 26.13.01.03B(61).
18. At all times relevant to the allegations set forth in this Consent Agreement, Respondent is, and has been, the "operator" and the "owner" of the Facility, as those terms are

defined in COMAR 26.13.01.03B(58) and (59), during the period of the violations alleged in this Consent Agreement.

19. At all times relevant to the allegations set forth in this Consent Agreement, and as described below, Respondent is, and has been, engaged in the “storage” of “solid waste” and “hazardous waste” in “containers” at the Facility, as those terms are defined in COMAR 26.13.01.03B(76), (73), (31), and (9).
20. At all times relevant to the allegations set forth in this Consent Agreement, Respondent’s Facility is, and has been, a hazardous waste storage “facility” as that term is defined in COMAR 26.13.01.03B(23).
21. On September 24, 2019, an EPA inspector and a MDE inspector (“the Inspectors”) conducted a Compliance Evaluation Inspection at the Facility (the “CEI” or “Inspection”) to examine the Respondent’s compliance with the federally-authorized MdHWMR and applicable federal hazardous waste regulations.
22. On the basis of EPA’s findings during the Inspection, and other information Respondent provided to EPA by the Respondent after the Inspection, EPA concludes that Respondent has violated certain requirements and provisions of RCRA Subtitle C, 42 U.S.C. §§ 6921-6939g, and certain federally-authorized MdHWMR requirements promulgated thereunder, as enumerated below.

Count I

Failure to make a hazardous waste determination

23. The information and allegations in the proceeding paragraphs of this Consent Agreement are incorporated herein by reference.
24. COMAR § 26.13.03.02A, provides that a person who generates solid waste shall determine if that waste is hazardous prior to disposal.
25. At the time of the September 24, 2019 CEI, the Inspectors observed a 55-gallon drum with an aerosol can puncture unit attached. The drum contained aerosol can content waste and was approximately 20% full. The drum did not have a label indicating the contents nor the start accumulation date. A representative of the Facility stated that a waste determination had not been made on the waste stream.
26. At the time of the September 24, 2019 CEI, Respondent violated COMAR § 26.13.03.02.A, by generating solid waste in the form of aerosol can contents and failing to determine if that waste is hazardous at the point of generation.
27. In failing to comply with COMAR § 26.13.03.02A, Respondent is subject to the

assessment of penalties under Section 3008(g) of RCRA, 42 U.S.C. § 6928(g).

Count II

Operating without a permit or valid exemption to the permitting requirement or interim status

28. The information and allegations in the preceding Paragraphs of this Consent Agreement are incorporated herein by reference.
29. COMAR § 26.13.07.01 states, subject to certain exceptions, no person may own or operate a facility that treats, stores or disposes of hazardous waste without first obtaining a permit or interim status for such facility.
30. At the time of the September 24, 2019 CEI, the Facility did not have a Hazardous Waste Permit or a valid exemption to the permitting requirement or interim status.
31. Pursuant to COMAR § 26.13.03.05E, a large quantity generator of hazardous waste may accumulate hazardous waste on site without a permit or interim status for 90 days or less provided that all of the requirements of the exemptions in COMAR § 26.13.03.05E are met.
32. At the time of the September 24, 2019 CEI, Respondent did not meet the following requirements for the exemption in COMAR 26.13.03.05E:
 - a. COMAR § 26.13.03.05E(1)(h)(iv) when it failed to label or mark clearly with the words “Hazardous Waste” one Main hazardous waste Tank (“MHW Tank”).
 - b. COMAR § 26.13.05.10D, as referenced by COMAR § 26.13.03.05E(1)(h), when it failed to document the daily walk-around inspections conducted by the Respondent on the MHW Tank at the Facility.
 - c. COMAR § 26.13.05.03.B, as referenced by COMAR §26.13.03.05E(1)(g), when it failed to operate and maintain the Facility to minimize the possibility of a release of hazardous waste or hazardous waste constituents to air, soil or surface water. Inspectors observed that the floor of the filter press room upon which acid filter cake residue (D002) is swept and washed into the Containment Pit Tank was corroded and in disrepair and not maintained sufficiently to minimize the possibility of release of hazardous waste to the environment.
33. At the time of the September 24, 2019 CEI, Respondent violated COMAR § 26.13.07.01, by operating a hazardous waste storage facility without a permit, interim status, or valid exemption to the permitting requirement.

34. In failing to comply with COMAR § 26.13.07.01 Respondent violated RCRA Section 3005(a) and (e), 42 U.S.C. § 6925(a) and (e), and is subject to the assessment of penalties under Section 3008(g) of RCRA, 42 U.S.C. § 6928(g).

Count III

Failure to document daily inspections of hazardous waste tank

35. The information and allegations in the preceding Paragraphs of this Consent Agreement are incorporated herein by reference.
36. COMAR § 26.13.05.10D requires a facility that accumulates hazardous waste in tanks to document daily inspections of hazardous waste tanks.
37. At the time of the September 24, 2019 CEI, Respondent violated COMAR § 26.13.05.10D, by failing to document the daily walk-around inspections that it conducted of its MHW Tank at the Facility.
38. In failing to comply with COMAR § 26.13.05.10D, Respondent is subject to the assessment of penalties under Section 3008(g) of RCRA, 42 U.S.C. § 6928(g).

Count IV

Failure to maintain and operate facility to minimize the possibility of a release

39. The information and allegations in the preceding Paragraphs of this Consent Agreement are incorporated herein by reference.
40. COMAR § 26.13.05.03B provides that the owner or operator of a hazardous waste facility will ensure that it is maintained sufficiently to minimize the possibility of release of hazardous waste to the environment.
41. At the time of the September 24, 2019 CEI, Respondent violated COMAR § 26.13.05.03B, by failing to ensure that it maintained the Facility sufficiently to minimize the possibility of release of hazardous waste to the environment. Inspectors observed that the floor of the filter press room, upon which acid filter cake residue (D002) is swept and washed into the Containment Pit Tank, was corroded and in disrepair and not maintained sufficiently to minimize the possibility of release of hazardous waste to the environment.
42. In failing to comply with COMAR § 26.13.05.03B, Respondent is subject to the assessment of penalties under Section 3008(g) of RCRA, 42 U.S.C. § 6928(g).

CIVIL PENALTY

43. In settlement of EPA’s claims for civil penalties for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty in the amount of **FIFTEEN THOUSAND FIFTY-ONE DOLLARS (\$15,051.00)**, which Respondent shall be liable to pay in accordance with the terms set forth below.
44. The civil penalty is based upon EPA’s consideration of a number of factors, including the penalty criteria (“statutory factors”) set forth in Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), including, the following: the seriousness of the violation and any good faith efforts to comply with the applicable requirements. These factors were applied to the particular facts and circumstances of this case with specific reference to EPA’s October, 1990 RCRA Civil Penalty Policy, as revised in June, 2003 (“RCRA Penalty Policy”), which reflect the statutory penalty criteria and factors set forth at Section 3008(a)(3) and (g) of RCRA, 42 U.S.C. §§ 6928(a)(3) and (g), the appropriate Adjustment of Civil Monetary Penalties for Inflation, pursuant to 40 C.F.R. Part 19, and the applicable EPA memoranda addressing EPA’s civil penalty policies to account for inflation.
45. Respondent agrees that, within 30 days of the effective date of this Consent Agreement and Final Order, Respondent shall make a payment of **FIFTEEN THOUSAND FIFTY-ONE DOLLARS (\$15,051.00)** to “**United States Treasury**” with the case name, address and docket number of this Consent Agreement and Final Order (RCRA-03-2024-0024), for the amount specified above. Respondent shall pay the assessed penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA website:
<https://www.epa.gov/financial/makepayment>. For additional instructions see:
<https://www.epa.gov/financial/additional-instructions-making-payments-epa>.
46. A copy of Respondent’s check or other documentation of payment of the penalty using the method selected by Respondent for payment shall be sent simultaneously, by email, to:

Jeffrey S. Nast
Sr. Assistant Regional Counsel
U.S. EPA, Region 3
nast.jeffrey@epa.gov

Regional Hearing Clerk
U.S. EPA, Region 3
R3_Hearing_Clerk@epa.gov

47. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, EPA is entitled to assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim, as more fully described below. Accordingly, Respondent's failure to make timely payment of the penalty as specified herein shall result in the assessment of late payment charges including interest, penalties and/or administrative costs of handling delinquent debts.
48. Payment of the civil penalty is due and payable immediately upon receipt by Respondent of a true and correct copy of the fully executed and filed Consent Agreement and Final Order. Receipt by Respondent or Respondent's legal counsel of such copy of the fully executed Consent Agreement and Final Order, with a date stamp indicating the date on which the Consent Agreement and Final Order was filed with the Regional Hearing Clerk, shall constitute receipt of written initial notice that a debt is owed EPA by Respondent in accordance with 40 C.F.R. § 13.9(a).
49. INTEREST: In accordance with 40 C.F.R § 13.11(a)(1), interest on the civil penalty assessed in this Consent Agreement and Final Order will begin to accrue on the date Respondent is notified of its debt to the United States as established upon the ratification and filing of a fully executed Consent Agreement and Final Order with the Regional Hearing Clerk. However, EPA will not seek to recover interest on any amount of the civil penalties that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R § 13.11(a).
50. ADMINISTRATIVE COSTS: The costs of the EPA's administrative handling of overdue debts will be charged and assessed monthly throughout the period a debt is overdue. 40 C.F.R. § 13.11(b). If Payment is not received within 30 calendar days of the effective date of this Consent Agreement, EPA will also assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid.
51. LATE PAYMENT PENALTY: A late payment penalty of six percent per year will be assessed monthly on any portion of the civil penalty that remains delinquent more than ninety (90) calendar days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d).
52. Respondent agrees not to deduct for federal tax purposes the civil penalty assessed in this Consent Agreement and Final Order.

53. The parties consent to service of the Final Order by e-mail at the following valid email addresses: nast.jeffrey@epa.gov (for Complainant), and mwitherup@witherupallenlaw.com (for Respondent).

GENERAL SETTLEMENT CONDITIONS

54. By signing this Consent Agreement, Respondent acknowledges that this Consent Agreement and Final Order will be available to the public and represents that, to the best of Respondent's knowledge and belief, this Consent Agreement and Final Order does not contain any confidential business information or personally identifiable information from Respondent.
55. Respondent certifies that any information or representation it has supplied or made to EPA concerning this matter was, at the time of submission true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. EPA shall have the right to institute further actions to recover appropriate relief if EPA obtains evidence that any information provided and/or representations made by Respondent to the EPA regarding matters relevant to this Consent Agreement and Final Order, including information about respondent's ability to pay a penalty, are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that EPA may have, civil or criminal, under law or equity in such event. Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

CERTIFICATION OF COMPLIANCE

56. Respondent certifies to EPA, upon personal investigation and to the best of its knowledge and belief, that it currently is in compliance with regard to the violations alleged in this Consent Agreement.

OTHER APPLICABLE LAWS

57. Nothing in this Consent Agreement and Final Order shall relieve Respondent of its obligation to comply with all applicable federal, state, and local laws and regulations, nor shall it restrict EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on the validity of any federal, state or local permit. This Consent Agreement and Final Order does not constitute a waiver, suspension or modification of the requirements of RCRA, or any regulations promulgated thereunder.

RESERVATION OF RIGHTS

58. This Consent Agreement and Final Order resolves only EPA’s claims for civil penalties for the specific violations alleged against Respondent in this Consent Agreement and Final Order. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. This settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice, 40 C.F.R. § 22.18(c). EPA reserves any rights and remedies available to it under RCRA, the regulations promulgated thereunder and any other federal law or regulation to enforce the terms of this Consent Agreement and Final Order after its effective date. Respondent reserves whatever rights or defenses it may have to defend itself in any such action .

EXECUTION /PARTIES BOUND

59. This Consent Agreement and Final Order shall apply to and be binding upon the EPA, the Respondent and the officers, directors, employees, contractors, successors, agents and assigns of Respondent. By his or her signature below, the person who signs this Consent Agreement on behalf of Respondent is acknowledging that he or she is fully authorized by the Respondent to execute this Consent Agreement and to legally bind Respondent to the terms and conditions of this Consent Agreement and Final Order.

EFFECTIVE DATE

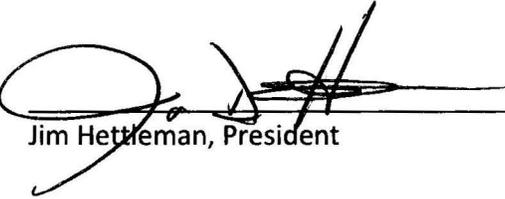
60. The effective date of this Consent Agreement and Final Order is the date on which the Final Order, signed by the Regional Administrator of EPA, Region III, or his/her designee, the Regional Judicial Officer, is filed along with the Consent Agreement with the Regional Hearing Clerk pursuant to the Consolidated Rules of Practice.

ENTIRE AGREEMENT

61. This Consent Agreement and Final Order constitutes the entire agreement and understanding between the Parties regarding settlement of all claims for civil penalties pertaining to the specific violations alleged herein and there are no representations, warranties, covenants, terms, or conditions agreed upon between the Parties other than those expressed in this Consent Agreement and Final Order.

For Respondent: Southern Galvanizing Company

Date: 2/23/2024

By: 
Jim Hettleman, President

For the Complainant:

After reviewing the Consent Agreement and other pertinent matters, I, the undersigned Director of the Enforcement and Compliance Assurance Division of the United States Environmental Protection Agency, Region III, agree to the terms and conditions of this Consent Agreement and recommend that the Regional Administrator, or his/her designee, the Regional Judicial Officer, issue the attached Final Order.

By: _____

[Digital Signature and Date]

Karen Melvin

Director, Enforcement and Compliance Assurance

Division

U.S. EPA – Region 3

Complainant

Attorney for Complainant:

By: _____

[Digital Signature and Date]

Jeffrey S. Nast

Sr. Assistant Regional Counsel

U.S. EPA – Region 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
1600 JFK BLVD
Philadelphia, Pennsylvania 19103



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Southern Galvanizing Company : U.S. EPA Docket No. RCRA-03-2024-0024
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: :
Southern Galvanizing Company :
1620 Bush Street :
Baltimore, MD 21230 :
Facility. :
:

FINAL ORDER

Complainant, the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region III, and Respondent, Southern Galvanizing Company have executed a document entitled "Consent Agreement," which I hereby ratify as a Consent Agreement in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22 (with specific reference to Sections 22.13(b) and 22.18(b)(2) and (3)). The terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated into this Final Order as if fully set forth at length herein.

Based upon the representations of the parties in the attached Consent Agreement, the penalty agreed to therein is based upon consideration of, *inter alia*, EPA's 1990 RCRA Civil Penalty Policy, as revised in June, 2003 ("RCRA Penalty Policy"), and again on May 6, 2020, and the statutory factors set forth at Section 3008(a)(3) and (g) of RCRA, 42 U.S.C. § 6928(a)(3) and (g).

NOW, THEREFORE, PURSUANT TO Section 3008(a) and (g) of the Resource Conservation and Recovery Act ("RCRA" or the "Act"), as amended, 42 U.S.C. § 6928(a) and (g), and Section 22.18(b)(3) of the Consolidated Rules of Practice, **IT IS HEREBY ORDERED** that Respondent pay a civil penalty in the amount of **FIFTEEN THOUSAND FIFTY-ONE DOLLARS (\$15,051.00)**, in accordance with the payment provisions set forth in the Consent Agreement and in 40 C.F.R. §

22.31(c), and comply with the terms and conditions of the Consent Agreement.

This Final Order constitutes the final Agency action in this proceeding. This Final Order shall not in any case affect the right of the Agency or the United States to pursue appropriate injunctive or other equitable relief, or criminal sanctions for any violations of the law. This Final Order resolves only those causes of action alleged in the Consent Agreement and does not waive, extinguish or otherwise affect Respondent’s obligation to comply with all applicable provisions of RCRA and the regulations promulgated thereunder.

The effective date of the attached Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

Date: _____

By: _____

Joseph J. Lisa
Regional Judicial and Presiding Officer
U.S. EPA Region III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103-2029

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|------------------------------|---|---|
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| Southern Galvanizing Company | : | DOCKET NO.: RCRA-03-2024-0024 |
| 1620 Bush Street | : | |
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| | : | |
| Southern Galvanizing Company | : | |
| 1620 Bush Street | : | |
| Baltimore, MD 21230 | : | |
| | : | |
| Facility. | : | |
| | : | |

CERTIFICATE OF SERVICE

I certify that the foregoing ***Consent Agreement and Final Order*** was filed with the EPA Region III Regional Hearing Clerk on the date that has been electronically stamped on the ***Consent Agreement and Final Order***. I further certify that, on the date set forth below, I caused to be served a true and correct copy of the foregoing to each of the following persons, in the manner specified below, at the following addresses:

Copies served via email to:

Margaret M. Witherup, Esq.
Witherup Allen Law
mwitherup@witherupallenlaw.com

Jeffrey S. Nast
Senior Assistant Regional Counsel
U.S. EPA, Region 3
nast.jeffrey@epa.gov

Rebecca Serfass
Senior Enforcement Officer/Inspector
U.S. EPA, Region 3
serfass.rebecca@epa.gov

Date: _____

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 3