



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 26 2016

REPLY TO THE ATTENTION OF

LC- 8J

VIA EMAIL

TO: Lhziemba@michaelbest.com

Ms. Leah H. Ziemba  
Michael Best & Friedrich LLP  
1 South Pinckney Street, Suite 700  
Madison, Wisconsin 53703

Consent Agreement and Final Order In the Matter of  
WRR Environmental Services Company, Inc., Docket No. EPCRA-05-2016-0019

Ms. Ziemba:

Enclosed please find a copy of a fully executed Consent Agreement and Final Order (CAFO) in resolution of the above case. This document was filed on September 26, 2016, with the Regional Hearing Clerk.

The civil penalty in the amount of \$29,861 is to be paid by the Respondent in the manner described in paragraph 70. Please be certain that the docket number is written on both the transmittal letter and the comment or description field of the electronic funds transfer.

Thank you for your cooperation in resolving this matter.

Sincerely,

*fr* Meghan Dunn  
Pesticides and Toxics Compliance Section

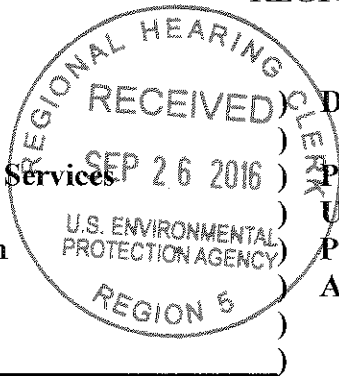
Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

In the Matter of:

WRR Environmental Services  
Company, Inc.  
Eau Claire, Wisconsin

Respondent.



Docket No. EPCRA-05-2016-0019

Proceeding to Assess a Civil Penalty  
Under Section 325(c) of the Emergency  
Planning and Community Right-to-Know  
Act of 1986, 42 U.S.C. § 11045(c)

Consent Agreement and Final Order

1. This is an administrative action commenced and concluded under Section 325(c) of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 U.S.C. § 11045(c), and Sections 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), as codified at 40 C.F.R. Part 22.
2. The Complainant is the Director of the Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.
3. Respondent is WRR Environmental Services Company, Inc., a corporation doing business in the State of Wisconsin.
4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).
5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. For the purposes of settlement, Respondent consents to the assessment of the civil penalty specified in this CAFO, and to the terms of this CAFO.

**Jurisdiction and Waiver of Right to Hearing**

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO and its right to appeal this CAFO.

9. Respondent certifies that it is complying with Section 313 of EPCRA, 42 U.S.C. § 11023.

**Statutory and Regulatory Background**

10. Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. §§ 372.22 and 372.30 require the owner or operator of a facility that has 10 or more full-time employees; is covered by certain Standard Industrial Classification (SIC) codes; meets one of the criteria set forth in 40 C.F.R. § 372.22(b)(1)-(3); and manufactured, processed or otherwise used a toxic chemical in an amount exceeding an applicable threshold quantity of that chemical listed under Section 313(f) of EPCRA and 40 C.F.R. §§ 372.25 and 372.28, during the calendar year, to complete and submit a toxic chemical release inventory form (Form R) to the Administrator of EPA and to the state in which the subject facility is located by July 1 for each toxic chemical manufactured, processed or otherwise used in quantities exceeding the established threshold during the preceding calendar year.

11. As set forth in Section 313(f) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25, except as provided in 40 C.F.R. §§ 372.27 and 372.28, the reporting threshold amount for a toxic chemical manufactured or processed at a facility is 25,000 pounds for calendar years

including and subsequent to 1989. The reporting threshold for a toxic chemical otherwise used at a facility is 10,000 pounds for calendar years including and subsequent to 1987.

12. Section 325(c) of EPCRA, 42 U.S.C. § 11045(c), authorizes the Administrator of EPA to assess a civil penalty of up to \$25,000 per day for each violation of Section 313 of EPCRA. The Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461 note (1990), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note (1996), required federal agencies to issue regulations adjusting for inflation the maximum civil penalties that may be assessed pursuant to each agency's statutes. EPA may assess a civil penalty of up to \$37,500 per day for each violation of Section 313 of EPCRA that occurred after January 12, 2009, pursuant to Section 325(c)(1) and (3) of EPCRA, 42 U.S.C. § 11045(c)(1) and (3), and 40 C.F.R. Part 19.

#### **Factual Allegations and Alleged Violations**

13. Respondent is a "person" as that term is defined at Section 329(7) of EPCRA, 42 U.S.C. § 11049(7).

14. At all times relevant to this CAFO, Respondent was an owner or operator of the facility located at 5200 Ryder Road, Eau Claire, Wisconsin (facility).

15. At all times relevant to this CAFO, Respondent had "10 or more full-time employees," as defined at 40 C.F.R. § 372.3, and was an employer at the facility.

16. Respondent's facility consists of buildings, equipment, structures and other stationary items which are located on a single site or on contiguous or adjacent sites and which are owned or operated by the same person.

17. During the calendar years 2012, 2011, and 2010, Respondent employed at its facility the equivalent of at least 10 employees with total paid hours equal to or more than 20,000

hours per calendar year.

18. Respondent's facility is a "facility" as that term is defined at Section 329(4) of EPCRA, 42 U.S.C. § 11049(4).

19. The facility has a SIC code of 4953, a covered SIC code as defined at Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.22.

20. From August 13, 2013 through August 15, 2013, a representative of EPA inspected Respondent's facility.

### Count 1

21. Complainant incorporates paragraphs 1 through 20 of the Order as if set forth in this paragraph.

22. During the 2012 calendar year, Respondent's facility processed 255,356 pounds of certain glycol ethers, Category Code N230.

23. "Certain glycol ethers" is a chemical category identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

24. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for certain glycol ethers for the 2012 calendar year on or before July 1, 2013.

25. Respondent did not submit to the Administrator of EPA and to Wisconsin a Form R for certain glycol ethers for the 2012 calendar year on or before July 1, 2013.

26. On September 23, 2015, Respondent submitted to the Administrator of EPA and to Wisconsin a Form R for certain glycol ethers for the 2012 calendar year.

27. Respondent's failure to submit timely to the Administrator of EPA a Form R for certain glycol ethers for the 2012 calendar year violated Section 313 of EPCRA, 42 U.S.C.

§ 11023, and 40 C.F.R. § 372.30.

**Count 2**

28. Complainant incorporates paragraphs 1 through 20 of this Complaint as if set forth in this paragraph.

29. During the 2012 calendar year, Respondent's facility processed 175,383 pounds of 1,2,4-trimethylbenzene, CAS No. 95-63-6.

30. 1,2,4-Trimethylbenzene, CAS No. 95-63-6, is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

31. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for 1,2,4-trimethylbenzene for the 2012 calendar year on or before July 1, 2013.

32. The Form R which Respondent submitted to the Administrator of EPA and to Wisconsin on June 19, 2013 indicated "NA" or "not applicable" for releases of 1,2,4-trimethylbenzene from the facility as fugitive and stack air emissions.

33. As part of its inspection of the facility, EPA determined that fugitive and stack air emissions of 1,2,4-trimethylbenzene occurred in calendar year 2012.

34. On September 23, 2015, Respondent submitted to the Administrator of EPA and to Wisconsin a revised Form R for 1,2,4-trimethylbenzene for the 2012 calendar year stating 54 pounds of fugitive emissions and 21 pounds of stack emissions occurred in calendar year 2012.

35. Respondent's failure to accurately report its total releases of 1,2,4-trimethylbenzene on its original Form R submission for calendar year 2012 violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.85(b).

### Count 3

36. Complainant incorporates paragraphs 1 through 20 of the Order as if set forth in this paragraph.

37. During the 2011 calendar year, Respondent's facility processed approximately 194,928 pounds of certain glycol ethers, Category Code N230.

38. "Certain glycol ethers" is a chemical category identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

39. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for certain glycol ethers for the 2011 calendar year on or before July 1, 2012.

40. Respondent did not submit to the Administrator of EPA and to Wisconsin a Form R for certain glycol ethers for the 2011 calendar year on or before July 1, 2012.

41. On October 2, 2015, Respondent submitted to the Administrator of EPA and to Wisconsin a Form R for certain glycol ethers for the 2011 calendar year.

42. Respondent's failure to submit timely to the Administrator of EPA a Form R for certain glycol ethers for the 2011 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

### Count 4

43. Complainant incorporates paragraphs 1 through 20 of this Complaint as if set forth in this paragraph.

44. During the 2011 calendar year, Respondent's facility processed approximately 146,152 pounds of 1,2,4-trimethylbenzene, CAS No. 95-63-6.

45. 1,2,4-Trimethylbenzene, CAS No. 95-63-6, is a chemical identified at Section

313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

46. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for 1,2,4-trimethylbenzene for the 2011 calendar year on or before July 1, 2012.

47. The Form R which Respondent submitted to the Administrator of EPA and to Wisconsin on May 23, 2012 indicated zero pounds 1,2,4-trimethylbenzene released from the facility as fugitive and stack air emissions.

48. As part of its inspection of the facility, EPA determined that routine fugitive and stack air emissions of 1,2,4-trimethylbenzene occurred from the facility.

49. On October 2, 2015, Respondent submitted to the Administrator of EPA and to Wisconsin a revised Form R for 1,2,4-trimethylbenzene for the 2011 calendar year stating 139 pounds of fugitive emissions and 46 pounds of stack emissions occurred in calendar year 2011.

50. Respondent's failure to accurately report its total releases of 1,2,4-trimethylbenzene on its original Form R submission for calendar year 2011 violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.85(b).

#### Count 5

51. Complainant incorporates paragraphs 1 through 20 of the Order as if set forth in this paragraph.

52. During the 2010 calendar year, Respondent's facility processed approximately 229,327 pounds of certain glycol ethers, Category Code N230.

53. "Certain glycol ethers" is a chemical category identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

54. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the



Administrator of EPA and to Wisconsin a Form R for certain glycol ethers for the 2010 calendar year on or before July 1, 2011.

55. Respondent did not submit to the Administrator of EPA and to Wisconsin a Form R for certain glycol ethers for the 2010 calendar year on or before July 1, 2011.

56. On October 2, 2015, Respondent submitted to the Administrator of EPA and to Wisconsin a Form R for certain glycol ethers for the 2010 calendar year.

57. Respondent's failure to submit timely to the Administrator of EPA a Form R for certain glycol ethers for the 2010 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

#### **Count 6**

58. Complainant incorporates paragraphs 1 through 20 of this Complaint as if set forth in this paragraph.

59. During the 2010 calendar year, Respondent's facility processed approximately 153,845 pounds of 1,2,4-trimethylbenzene, CAS No. 95-63-6.

60. 1,2,4-Trimethylbenzene, CAS No. 95-63-6, is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

61. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for 1,2,4-trimethylbenzene for the 2010 calendar year on or before July 1, 2011.

62. The Form R which Respondent submitted to the Administrator of EPA and to Wisconsin on April 19, 2012 indicated zero pounds of 1,2,4-trimethylbenzene released from the facility as fugitive and stack air emissions.

63. As part of its inspection of the facility, EPA determined that routine fugitive and

stack air emissions of 1,2,4-trimethylbenzene occurred from the facility.

64. On October 2, 2015, Respondent submitted to the Administrator of EPA and to Wisconsin a revised Form R for 1,2,4-trimethylbenzene for the 2010 calendar year stating 164 pounds of fugitive emissions and 54 pounds of stack emissions occurred in calendar year 2010.

65. Respondent's failure to accurately report its total releases of 1,2,4-trimethylbenzene on its original Form R submission for calendar year 2010 violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.85(b).

#### **Civil Penalty**

66. Pursuant to Section 325 of EPCRA, 42 U.S.C. § 11045, Complainant determined that an appropriate civil penalty to settle this action is \$29,861. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violations, and with respect to Respondent, its ability to pay, prior history of violations, economic benefit or savings resulting from the violations, and its agreement to perform a supplemental environmental project, and any other matters as justice may require. Complainant also considered EPA's Enforcement Response Policy for Section 313 of the Emergency Planning and Community Right-to-Know Act (1986) and Section 6607 of the Pollution Prevention Act (1990) (amended) (April 12, 2001).

67. Within 30 days after the effective date of this CAFO, Respondent must pay a \$29,861 civil penalty for the EPCRA violations by electronic funds transfer, payable to "Treasurer, United States of America," and sent to:

Federal Reserve Bank of New York  
ABA No. 021030004  
Account No. 68010727  
33 Liberty Street  
New York, New York 10045  
Field Tag 4200 of the Fedwire message should read:  
“D 68010727 Environmental Protection Agency”

In the comment or description field of the electronic funds transfer, state “WRR Environmental Services Company, Inc.” and the docket number of this CAFO.

68. Respondent must send a notice of payment that states Respondent’s name, complete address and the case docket number to EPA at the following addresses when it pays the penalty:

Regional Hearing Clerk (E-19J)  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Meghan Dunn (LC-8J)  
Pesticides and Toxics Compliance Section  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Thomas Williams (C-14J)  
Office of Regional Counsel  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

69. This civil penalty is not deductible for federal tax purposes.

70. If Respondent does not pay timely the civil penalty, or any stipulated penalties due under paragraph 82, below, EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States enforcement expenses for the collection action. The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

71. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount

overdue under this CAFO. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 31 U.S.C. § 3717. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

### **Supplemental Environmental Project**

72. Respondent must complete a supplemental environmental project (SEP) designed to protect public health and the environment by purchasing technological equipment for the City of Eau Claire Fire Department to improve the department's ability to respond to emergencies.

73. Respondent must complete the SEP as follows:

Purchase four (4) AreaRAE Steel Monitors and two (2) Wireless MultiRAE Lite Monitors for the City of Eau Claire Fire Department. The purchased equipment must serve the function of allowing the Eau Claire Fire Department to monitor air conditions, including toxic chemical concentrations, in emergency response situations. The equipment must be purchased by Respondent and provided to the Eau Claire Fire Department within 6 months of the filing date of this CAFO.

74. Respondent must spend at least \$46,181 to purchase the equipment.

75. Respondent certifies as follows:

I certify that WRR Environmental Services Company, Inc. is not required to perform or develop the SEP by any law, regulation, order, or agreement or as injunctive relief as of the date that I am signing this CAFO. I further certify that WRR Environmental Services Company, Inc. has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

I certify that WRR Environmental Services Company, Inc. is not a party to any open federal financial assistance transaction that is funding or could be used to fund the same activity as the SEP. I further certify that, to the best of my knowledge and belief after reasonable inquiry, there is no such open federal financial transaction that is funding or could be used to fund the same activity as the SEP, nor has the same activity been described in an unsuccessful federal financial assistance transaction proposal submitted to EPA within two years of the date that I am signing this CAFO (unless the project was barred from funding as statutorily ineligible.) For purposes of this

certification, the term “open federal financial assistance transaction” refers to a grant, cooperative agreement, loan, federally-guaranteed loan guarantee or other mechanism for providing federal financial assistance whose performance period has not expired.

76. Respondent must submit a SEP completion report to EPA no later than 7 months after the filing date of this CAFO. This report must contain the following information:

- a. Detailed description of the SEP as completed;
- b. Itemized costs of goods and services used to complete the SEP documented by copies of invoices, purchase orders or canceled checks that specifically identify and itemize the individual costs of the goods and services;
- c. Certification that Respondent has completed the SEP in compliance with this CAFO; and
- d. Description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible).

77. Respondent must submit all notices and reports required by this CAFO by first class mail to Meghan Dunn of the Pesticides and Toxics Compliance Section at the address provided in paragraph 68, above.

78. In each report that Respondent submits as provided by this CAFO, it must certify that the report is true and complete by including the following statement signed by one of its officers:

I certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, it is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

79. Following receipt of the SEP completion report described in paragraph 76, above, EPA must notify Respondent in writing that:

- a. It has satisfactorily completed the SEP and the SEP report;
- b. There are deficiencies in the SEP as completed or in the SEP report and EPA

will give Respondent 30 days to correct the deficiencies; or

- c. It has not satisfactorily completed the SEP or the SEP report and EPA will seek stipulated penalties under paragraph 81, below.

80. If EPA exercises option b, above, Respondent may object in writing to the deficiency notice within 10 days of receiving the notice. The parties will have 30 days from EPA's receipt of Respondent's objection to reach an agreement. If the parties cannot reach an agreement, EPA will give Respondent a written decision on its objection. Respondent will comply with any requirements that EPA imposes in its decision. If Respondent does not complete the SEP as required by EPA's decision, Respondent will pay stipulated penalties to the United States under paragraph 81, below.

81. If Respondent violates any requirement of this CAFO relating to the SEP, Respondent must pay stipulated penalties to the United States as follows:

- a. Except as provided in subparagraph b, below, if Respondent did not complete the SEP satisfactorily according to the requirements of this CAFO including the schedule in paragraph 73, Respondent must pay a penalty of \$36,945.
- b. If Respondent did not complete the SEP satisfactorily, but EPA determines that Respondent made good faith and timely efforts to complete the SEP and certified, with supporting documents, that it spent at least 90 percent of the amount set forth in paragraph 74, Respondent will not be liable for any stipulated penalty under subparagraph a, above.
- c. If Respondent completed the SEP satisfactorily, but spent less than 90 percent of the amount set forth in paragraph 74, Respondent must pay a penalty of \$4,000.
- d. If Respondent did not submit timely the SEP completion report, Respondent must pay penalties in the following amounts for each day after the report was due until it submits the report:

<u>Penalty per violation per day</u>	<u>Period of violation</u>
\$100	1 <sup>st</sup> through 14 <sup>th</sup> day
\$250	15 <sup>th</sup> through 30 <sup>th</sup> day
\$500	31 <sup>st</sup> day and beyond

82. EPA's determinations of whether Respondent completed the SEP satisfactorily and whether Respondent made good faith and timely efforts to complete the SEP will bind Respondent.

83. Respondent must pay any stipulated penalties within 15 days of receiving EPA's written demand for the penalties. Respondent will use the method of payment specified in paragraph 67, above, and will pay interest, handling charges and nonpayment penalties on any overdue amounts.

84. Any public statement that Respondent makes referring to the SEP must include the following language, "This action was undertaken in connection with the settlement of an enforcement action against WRR Environmental Services Company, Inc. brought by the U.S. Environmental Protection Agency to enforce federal law."

85. Nothing in this CAFO is intended to, nor will be construed to, constitute EPA approval of the equipment or technology purchased by Respondent in connection with the SEP under the terms of this CAFO.

86. For federal income tax purposes, Respondent will neither capitalize into inventory or basis, nor deduct any costs or expenditures incurred in performing the SEP.

#### **General Provisions**

87. Consistent with the "Standing Order Authorizing E-Mail Service of Order and Other Documents Issued by the Regional Administrator or Regional Judicial Officer Under the Consolidated Rules," dated March 27, 2015, the parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: [Williams.thomas@epa.gov](mailto:Williams.thomas@epa.gov) (for Complainant), and [Lhziemba@michaelbest.com](mailto:Lhziemba@michaelbest.com) (for Respondent). The parties waive their right to service by methods specified in 40 C.F.R. § 22.6.

88. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in the CAFO.

89. This CAFO does not affect the rights of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

90. This CAFO does not affect Respondent's responsibility to comply with EPCRA and other applicable federal, state and local laws.

91. This CAFO is a "final order" for purposes of EPA's Enforcement Response Policy for Section 313 of EPCRA.

92. The terms of this CAFO bind Respondent, its successors and assigns.

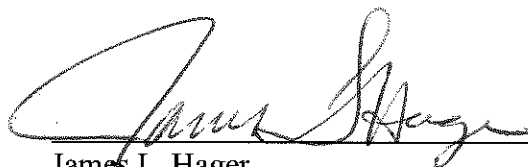
93. Each person signing this agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

94. Each party agrees to bear its own costs and attorneys fees in this action.

95. This CAFO constitutes the entire agreement between the parties.

**WRR Environmental Services Company, Inc., Respondent**

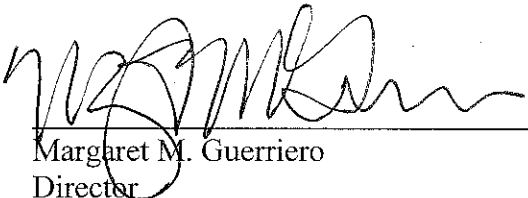
9/12/2016  
Date

  
James L. Hager  
President and CEO  
WRR Environmental Services Company, Inc.



**United States Environmental Protection Agency, Complainant**

9/20/2016  
Date

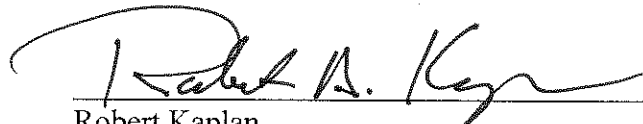
  
\_\_\_\_\_  
Margaret M. Guerriero  
Director  
Land and Chemicals Division

**In the Matter of:**  
**WRR Environmental Services Company, Inc.**  
**Docket No. EPCRA-05-2016-0019**

**Final Order**

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

9/22/15  
Date

  
Robert Kaplan  
Acting Regional Administrator  
United States Environmental Protection Agency  
Region 5

In the matter of: WRR Environmental Services Company, Inc.  
Docket Number: EPCRA-05-2016-0019

**CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of the foregoing *Consent Agreement and Final Order*, which was filed on September 26, 2016, in the following manner to the addressees:

Copy by E-mail to

Attorney for Respondent:

Leah H. Ziemba

**Lhziemba@michaelbest.com**

Copy by E-mail to

Attorney for Complainant:

Thomas Williams

**Williams.thomas@epa.gov**


Copy by E-mail to

Regional Judicial Officer:

Ann Coyle

**coyle.ann@epa.gov**

Dated:

September 26, 2016   
\_\_\_\_\_  
LaDawn Whitehead  
Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 5