

**U.S. EPA REGION 3
HEARING CLERK**

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 Chaitnya Inc. (“Respondent”) (collectively the “Parties”), pursuant to Section 9006 of the Solid Waste Disposal Act, commonly referred to as the Resource Conservation and Recovery Act of 1976, as amended (“RCRA” or “the Act”), 42 U.S.C. § 6991e, 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 9006 of RCRA, 42 U.S.C. § 6991e, authorizes the Administrator of the U.S. Environmental Protection 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 the authority to enter into agreements concerning administrative penalties to the Complainant. 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 Subtitle I 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 (“EPA”) 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. The EPA has given the Virginia Department of Environmental Quality (“VADEQ”) notice of the issuance of this Consent Agreement and Final Order in accordance with Section 9006(a)(2) of RCRA, 42 U.S.C. § 6991e(a)(2).

GENERAL PROVISIONS

6. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this Consent Agreement and Final Order.
7. Except as provided in Paragraph 6, above, Respondent neither admits nor denies the specific factual allegations set forth in this Consent Agreement.
8. Except as provided in Paragraph 6 above, Respondent neither admits nor denies the alleged violations of law set forth in this Consent Agreement.
9. Respondent agrees not to contest the jurisdiction of the 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.

13. By signing this Consent Agreement, Respondent waives any rights or defenses that respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the Final Order accompanying the Consent Agreement.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

14. 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.
15. The Commonwealth of Virginia is approved to administer and enforce an underground storage tank (“UST”) program in lieu of the Federal program under Subtitle I of RCRA, as amended, 42 U.S.C. §§ 6991-6991m. The program, as administered by VADEQ, was approved by the EPA, pursuant to 42 U.S.C. § 6991c and 40 C.F.R. part 281. The EPA approved Virginia’s UST program, set forth in the Virginia Administrative Code (“VAC”), as “Underground Storage Tanks: Technical Standards and Corrective Action Requirements” (“VA UST Regulations”) at 9 VAC §§ 25-580 *et seq.* and 9 VAC §§ 25-50 *et seq.* on September 28, 1998. The approval became effective on October 28, 1998. A subsequent program revision application was approved by the EPA and became effective on May 3, 2021.
16. Virginia has primary responsibility for administering and enforcing its federally approved UST program. However, the EPA retains the authority to exercise its inspection and enforcement authorities under sections 9005 and 9006 of Subtitle I of RCRA, 42 U.S.C. §§ 6991d and 6991e, regardless of whether Virginia has taken its own actions, as well as under any other applicable statutory and regulatory provisions.
17. Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d), authorizes the assessment of civil penalties against any owner or operator of an UST who fails to comply with, *inter alia*, any requirement or standard of a State program that has been approved pursuant to Section 9004 of RCRA, 42 U.S.C. § 6991c, for the violations alleged herein.
18. The VA UST Regulations regulate USTs used to contain “regulated substances,” as that term is defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 9 VAC § 25-580-10.
19. At all times relevant to the alleged violations in this Consent Agreement and Final Order, Respondent has been a “person” as defined in Section 9001(5) of RCRA, 42 U.S.C. § 6991(5), and 9 VAC § 25-580-10.
20. At all times relevant to this Consent Agreement, Respondent is, and has been, the “owner” and “operator,” as defined by Section 9001(3) and (4) of RCRA, 42 U.S.C. § 6991(3) and (4), and 9 VAC § 25-580-10, of “USTs” and “UST systems,” as defined in

Section 9001(10) of RCRA, 42 U.S.C. § 6991(10), and 9 VAC § 25-580-10, at the Country Corner gas station and convenience store facility located at 332 Douglas Drive, Damascus, Virginia 24236 (“the Facility”).

21. At all times relevant to this Consent Agreement, there is, and there has been, the following UST at the Facility, which contains a regulated substance.

- a. One (1) UST, which is compartmentalized into two (2) sections:

Tank #	Material Stored	Capacity (gallons)	Installation Date	Tank Construction Material	Piping Construction Material
1C	Regular Gasoline	8,000	8/7/95	Double-Walled Composite	Fiberglass-Reinforced Plastic
2C	Premium Gasoline	4,000	8/7/95	Double-Walled Composite	Fiberglass-Reinforced Plastic

22. At all times relevant to the alleged violations in this Consent Agreement and Final Order, the UST at the Facility was and is a “new tank system,” as defined in 9 VAC § 25-580-10, which states that a “new tank system” means a tank system used to contain an accumulation of regulated substances and for which installation has commenced after December 22, 1988.
23. On April 17, 2024, under the authority of Section 9005(a) of RCRA, 42 U.S.C. § 6991d(a), EPA inspectors conducted a compliance evaluation inspection (the “Inspection”) at the Facility to determine its compliance with RCRA Subtitle I and the VA UST Regulations.
24. On February 20, 2025, the EPA sent Respondent a Notice to Show Cause letter outlining the alleged violations described herein.

Count 1

Failure to Conduct Required Release Detection

25. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
26. 9 VAC § 25-580-140.1.a requires that facilities monitor tanks installed before September 15, 2010 for releases at least once every thirty (30) days using a method listed in 9 VAC § 25-580-160.4 through .9.
27. 9 VAC § 25-580-160.7 allows release detection through interstitial monitoring.

28. At the time of the Inspection, the Respondent used a vacuum gage, which monitors the interstitial space of the UST, to perform release detection. Accordingly, the Facility used interstitial monitoring for release detection.
29. At the Inspection, the Respondent provided records of pressure readings, where the Facility checked the vacuum gauge on the UST for release detection, from January 2023 through April 2024. EPA officials observed that the records indicated the following:
 - a. A reading on February 6, 2023, but the next reading was not until March 24, 2023 (sixteen days late);
 - b. A reading on June 15, 2023, but the next reading was not until July 18, 2023 (three days late);
 - c. A reading on July 18, 2023, but the next reading was not until August 21, 2023 (four days late);
 - d. A reading on September 5, 2023, but the next reading was not until October 9, 2023 (four days late);
 - e. A reading on November 2, 2023, but the next reading was not until December 4, 2023 (two days late);
 - f. A reading on January 2, 2024, but the next reading was not until February 2, 2024 (one day late); and
 - g. A reading on February 2, 2024, but the next reading was not until March 8, 2024 (five days late).
30. From March 2023 through March 2024, Respondent failed to conduct release detection monitoring at least once every thirty days during the periods specified in Paragraph 29.
31. From March 2023 through March 2024, Respondent violated 9 VAC § 25-580-140.1.a by failing to conduct release detection monitoring at least once every thirty days during the periods specified in Paragraph 29.
32. In failing to comply with 9 VAC § 25-580-140.1.a, Respondent violated Subtitle I of RCRA, 42 U.S.C. §§ 6991-6991m, and is subject to the assessment of penalties under Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d).

Count 2

Failure to Conduct Required Walkthrough Inspections

33. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
34. 9 VAC § 25-580-85.A.1.a requires that facilities, as of January 1, 2021, conduct a walkthrough inspection that, at minimum, checks spill prevention equipment and release detection equipment, at least once every thirty (30) days.

35. At the Inspection, the Respondent provided records of walkthrough inspections, from January 2023 through April 2024. EPA officials observed that the records indicated the following:
- a. A walkthrough inspection on February 6, 2023, but the next walkthrough inspection was not until March 24, 2023 (sixteen days late);
 - b. A walkthrough inspection on June 15, 2023, but the next walkthrough inspection was not until July 18, 2023 (three days late);
 - c. A walkthrough inspection on July 18, 2023, but the next walkthrough inspection was not until August 21, 2023 (four days late);
 - d. A walkthrough inspection on September 5, 2023, but the next walkthrough inspection was not until October 9, 2023 (four days late);
 - e. A walkthrough inspection on November 2, 2023, but the next walkthrough inspection was not until December 4, 2023 (two days late);
 - f. A walkthrough inspection on January 2, 2024, but the next walkthrough inspection was not until February 2, 2024 (one day late); and
 - g. A walkthrough inspection on February 2, 2024, but the next walkthrough inspection was not until March 8, 2024 (five days late).
36. From March 2023 through April 2024, Respondent failed to conduct walkthrough inspections to check spill prevention equipment and release detection equipment at least once every thirty days during the periods specified in Paragraph 35.
37. From March 2023 through April 2024, Respondent violated 9 VAC § 25-580-85.A.1.a by failing to conduct release detection monitoring at least once every thirty days during the periods specified in Paragraph 35.
38. In failing to comply with 9 VAC § 25-580-85.A.1.a, Respondent violated Subtitle I of RCRA, 42 U.S.C. §§ 6991-6991m, and is subject to the assessment of penalties under Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d).

Count 3

Failure to Annually Certify Tank Release Detection Equipment

39. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
40. 9 VAC § 25-580-130.A.3.d requires that Owners and Operators of UST systems, as of January 1, 2021, must provide a method, or combination of methods, of release detection that is operated and maintained, and where electronic and mechanical components are tested for proper operation. Testing of proper operation must be

performed annually and for vacuum pumps and pressure gauges must at minimum ensure proper communication with sensors and the controller.

41. The Facility uses a vacuum gauge as its release detection equipment.
42. At the Inspection, EPA officials asked for the most recent certification of the vacuum gauge, but the Respondent was unable to provide the documentation and indicated the Facility had recently installed a new gauge.
43. VADEQ subsequently provided the EPA with documentation that the Facility replaced the vacuum gauge on June 3, 2022.
44. Accordingly, an annual certification of the release detection equipment was due June 3, 2023.
45. The Respondent was unable to provide an annual certification of the release detection equipment for either 2023 or 2024.
46. The Facility provided an annual certification to the EPA dated May 19, 2025.
47. From June 3, 2023 through May 19, 2025, Respondent failed to annually certify its tank release detection equipment.
48. From June 3, 2023 through May 19, 2025, Respondent violated 9 VAC § 25-580-130.A.3.d by failing to annually certify its tank release detection equipment.
49. In failing to comply with 9 VAC § 25-580-130.A.3.d, Respondent violated Subtitle I of RCRA, 42 U.S.C. §§ 6991-6991m, and is subject to the assessment of penalties under Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d).

CIVIL PENALTY

50. In settlement of the 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 **THIRTY THOUSAND** dollars (**\$30,000**), which Respondent shall be liable to pay in accordance with the terms set forth below.
51. In determining the amount of the civil penalty to be assessed, the EPA has taken into account the factors specified in Section 9006(c) and (e) of RCRA, 42 U.S.C. § 6991e(c) and (e). After considering these factors, the EPA has determined that an appropriate penalty to settle this action is \$30,000.

52. Respondent agrees to pay a civil penalty in the amount of \$30,000 ("Assessed Penalty") within thirty (30) days of the Effective Date of this Consent Agreement and Final Order.
53. 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>. Any checks should be made payable to "Treasurer, United States of America." However, for any payments made after September 30, 2025, and in accordance with the March 25, 2025 Executive Order on [Modernizing Payments To and From America's Bank Account](#), Respondent shall pay using one of the electronic payments methods listed on [EPA's How to Make a Payment website](#) and will not pay with a paper check.
54. When making a payment, Respondent shall:
- a. Identify every payment with Respondent's name and the docket number of this Consent Agreement, **EPA Docket Number RCRA-03-2025-0122**,
 - b. Concurrently with any payment or within 24 hours of any payment, Respondent shall serve Proof of Payment simultaneously **by email** to the following person(s):

Amy Stevens
Assistant Regional Counsel
Stevens.amy@epa.gov,

U.S. Environmental Protection Agency
Cincinnati Finance Center
CINWD_AcctsReceivable@epa.gov,

and

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

"Proof of Payment" means, as applicable, a copy of the check, confirmation of credit card or debit card payment, or confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to the EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent's name.

55. Interest, Charges, and Penalties on Late Payments. Pursuant to 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay the full amount of the Assessed Penalty per this Consent Agreement, the EPA is authorized to recover, in addition to the amount of the unpaid Assessed Penalty, the following amounts.

a. Interest. Interest begins to accrue from the Effective Date of this Consent Agreement. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. To protect the interests of the United States, the rate of interest is set at the Internal Revenue Service ("IRS") standard underpayment rate, any lower rate would fail to provide Respondent adequate incentive for timely payment.

b. Handling Charges. Respondent will be assessed monthly a charge to cover the EPA's costs of processing and handling overdue debts. If Respondent fails to pay the Assessed Penalty in accordance with this Consent Agreement, the EPA will assess a charge to cover the costs of handling any unpaid amounts for the first thirty (30) day period after the Effective Date. Additional handling charges will be assessed every thirty (30) days, or any portion thereof, until the unpaid portion of the Assessed Penalty as well as any accrued interest, penalties, and other charges are paid in full.

c. Late Payment Penalty. A late payment penalty of six percent (6%) per annum, will be assessed monthly on all debts, including any unpaid portion of the Assessed Penalty, interest, penalties, and other charges, that remain delinquent more than ninety (90) days. Any such amounts will accrue from the Effective Date.

56. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Consent Agreement, the EPA may take additional actions. Such actions the EPA may take include, but are not limited to, the following.

a. Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R. §§ 13.13 and 13.14.

b. Collect the debt by administrative offset (i.e., the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, per 40 C.F.R. Part 13, Subparts C and H.

c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, per 40 C.F.R. § 13.17.

d. Refer this matter to the United States Department of Justice for litigation and collection, per 40 C.F.R. § 13.33.

57. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.
58. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Consent Agreement shall not be deductible for purposes of federal taxes.
59. 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 the EPA by Respondent in accordance with 40 C.F.R. § 13.9(a).
60. The Parties consent to service of the Final Order by e-mail at the following valid email addresses: stevens.amy@epa.gov (for Complainant), and yog965@aol.com (for Respondent).

GENERAL SETTLEMENT CONDITIONS

61. 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.
62. Respondent certifies that any information or representation it has supplied or made to the 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. The EPA shall have the right to institute further actions to recover appropriate relief if the 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, are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that the 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

63. Respondent certifies to the 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

64. 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 the 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

65. This Consent Agreement and Final Order resolves only the EPA's claims for civil penalties for the specific violations alleged against Respondent in this Consent Agreement and Final Order. The EPA reserves the right to commence action against any person, including Respondent, in response to any condition which the 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). The 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.

EXECUTION /PARTIES BOUND

66. 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 providing the signature below, the person who signs this Consent Agreement on behalf of Respondent is acknowledging that the person signing 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

67. The effective date of this Consent Agreement and Final Order (“Effective Date”) is the date on which the Final Order, signed by the Regional Administrator of the EPA, Region 3, or the Regional Administrator’s 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

68. 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.

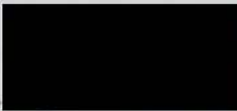
In the Matter of: Chaitnya Inc.

EPA Docket No. RCRA-03-2025-0122

For Respondent: Chaitnya Inc.

Date: 8/28/25

By: _____


Yuvraj Patel
Owner

For the Complainant:

After reviewing the Consent Agreement and other pertinent matters, I, the undersigned Acting Director of the Enforcement & Compliance Assurance Division of the United States Environmental Protection Agency, Region 3, agree to the terms and conditions of this Consent Agreement and recommend that the Regional Administrator, or the Regional Administrator's designee, the Regional Judicial Officer, issue the attached Final Order.

By: **ANDREA BAIN** Digitally signed by ANDREA BAIN
Date: 2025.09.08 08:18:34 -04'00'

[Digital Signature and Date]
Acting Director
Enforcement & Compliance Assurance Division
U.S. EPA – Region 3
Complainant

Attorney for Complainant:

By: **AMY STEVENS** Digitally signed by AMY STEVENS
Date: 2025.09.04 13:45:11 -04'00'

[Digital Signature and Date]
Amy Stevens
Assistant Regional Counsel
U.S. EPA – Region 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

FILED

Sep 15, 2025

10:16 am

U.S. EPA REGION 3
HEARING CLERK

In the Matter of:	:
	:
Chaitnya Inc.	: U.S. EPA Docket No. RCRA-03-2025-0122
332 Douglas Drive	:
Damascus, Virginia 24236	: Proceeding under Section 9006 of the Resource
	: Conservation and Recovery Act, as amended,
Respondent.	: 42 U.S.C. Section 6991e
	:
Country Corner	:
332 Douglas Drive	:
Damascus, Virginia 24236,	:
	:
Facility.	:
	:

FINAL ORDER

Complainant, the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3, and Respondent, Chaitnya Inc., 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.

NOW, THEREFORE, PURSUANT TO Section 9006 of RCRA, 42 U.S.C. Section 6991e, 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 **THIRTY THOUSAND DOLLARS (\$30,000)**, 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 foregoing Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

By: **JEFFREY NAST** Digitally signed by JEFFREY NAST
Date: 2025.09.15 08:31:25 -04'00'

Regional Judicial and Presiding Officer
U.S. EPA Region 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

In the Matter of:	:	
	:	
Chaitnya Inc.	:	
332 Douglas Drive	:	U.S. EPA Docket No. RCRA-03-2025-0122
Damascus, Virginia 24236	:	
	:	
Respondent,	:	Proceeding under Section 9006 of the
	:	Resource Conservation and Recovery Act, as
	:	amended, 42 U.S.C. Section 6991e
	:	
Country Corner	:	
332 Douglas Drive	:	
Damascus, Virginia 24236	:	
	:	
	:	
Facility.	:	

CERTIFICATE OF SERVICE

I certify that the foregoing ***Consent Agreement and Final Order*** was filed with the EPA Region 3 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:

Yuvraj Patel, Owner
Chaitnya Inc.
Yog965@aol.com
332 Douglas Drive
Damascus, Virginia 24236

Amy Stevens
Assistant Regional Counsel
U.S. EPA, Region 3
stevens.amy@epa.gov

Melissa Toffel
UST Enforcement Officer
U.S. EPA, Region 3
toffel.melissa@epa.gov

BEVIN ESPOSITO Digitally signed by BEVIN ESPOSITO
Date: 2025.09.15 10:19:03 -04'00'

[Digital Signature and Date]

Regional Hearing Clerk

U.S. Environmental Protection Agency, Region 3