

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II

2010 SEP 22 A 9:41

REGIONAL HEARING
CLERK

In the Matter of:

Grenadier Realty Corp.
Brooklyn, New York

Respondent

In a proceeding under Section 113(d)
of the Clean Air Act 42 U.S.C. § 7413(d)

**CONSENT AGREEMENT
AND
FINAL ORDER**

CAA-02-2010-1234

PRELIMINARY STATEMENT

The United States Environmental Protection Agency (EPA) issues this Consent Agreement and Final Order (CAFO) under the authority of the Clean Air Act (CAA or Act), 42 U.S.C. § 7401 et seq., 42 U.S.C. § 7413(d), Section 113(d), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, 40 C.F.R. Part 22 (Consolidated Rules of Practice). The Complainant in this matter is the Director of the Division of Enforcement and Compliance Assistance (DECA), EPA Region 2. The Complainant is delegated the authority to issue CAA § 113(d) Complaints and Consent Agreements on behalf of EPA Region 2, which includes the State of New York, the State of New Jersey, the Commonwealth of Puerto Rico, and the Territory of the U.S. Virgin Islands. The Regional Administrator of EPA Region 2 is duly delegated the authority to execute CAA § 113(d) Final Orders.

On July 14, 2009, the United States Department of Justice (DOJ) granted the EPA Region 2 request for a waiver of the CAA § 113(d) one year time and penalty amount limitation on EPA's authority to initiate an administrative action in this matter against Grenadier Realty Corp. (Grenadier or Respondent).

In accordance with §§ 22.13(b), and 22.18(b), EPA and Respondent enter into this Consent Agreement and propose the attached Final Order to resolve the violations alleged in the Conclusions of Law section of this Consent Agreement.

In this action, EPA finds that Grenadier, at the Bay Park 1 Facility, located at 3325 Neptune Avenue, Brooklyn, New York, and the Park Lane Facility, located at 1965 Lafayette Avenue, Bronx, New York (Facilities), violated 40 C.F.R. Part 60, Subpart A, 40 C.F.R. §§ 60.1 – 60.19, the "New Source Performance Standards General Provisions" (NSPS General Provisions), and 40 C.F.R. Part 60, Subpart Dc, 40 C.F.R. §§ 60.40c - 60.48c the "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" (NSPS Subpart Dc), promulgated pursuant to §§ 111 and 114 of the Act.

For purposes of this proceeding, and to avoid the expense of protracted litigation, Respondent: (1) admits that EPA has jurisdiction over the subject matter as alleged in this Consent Agreement; (2) neither admits nor denies specific factual allegations contained in this Consent Agreement; (3) consents to the terms of agreement set forth in this Consent Agreement; and (4) consents to the issuance of the attached Final Order.

Statutory and Regulatory Background

1. Section 113(a)(3) of the Act authorizes the Administrator of EPA to issue an administrative penalty order, in accordance with § 113(d) of the Act, against any person that has violated or is in violation of the Act.

2. Section 113(d)(1)(B) of the Act, authorizes EPA to issue an administrative order against any person whenever, on the basis of any available information, the Administrator finds that such person has or is violating any requirements or prohibitions of titles III, IV-A, V, or VI of the Act including but not limited to a requirement or prohibition of any rule, order, waiver, permit or plan promulgated, issued or approved under the Act.

3. Section 302(e) of the Act defines the term "person" as an individual, corporation, partnership, association, state municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent, or employee thereof.

4. Section 111(b)(1)(A) of the Act, authorizes the Administrator of EPA (Administrator) to publish a list of categories of stationary sources that the Administrator has determined "causes, or contributes significantly to, air pollution which may reasonably be anticipated to endanger public health or welfare."

5. Section 111(a)(3) of the Act defines "stationary source" as any building, structure, facility, or installation which emits or may emit any air pollutant.

6. Section 111(a)(5) of the Act defines "owner or operator" as any person who owns, leases, operates, controls, or supervises a stationary source.

7. Section 111(e) of the Act states "once the standards of performance promulgated under the Act are effective, it is unlawful for any owner or operator of any

new source to operate such source in violation of any standard of performance applicable to such source.”

8. Pursuant to § 114(a)(1) of the Act, the Administrator may require owners or operators of emission sources to submit specific information regarding facilities, to establish and maintain records, to make reports, to sample emission points, and to install, use and maintain such monitoring equipment or methods in order to determine whether any person is in violation of the Act.

9. Pursuant to §§ 111 and 114 of the Act, EPA promulgated 40 C.F.R. Part 60 Subpart A, “New Source Performance Standards General Provisions” (NSPS General Provisions).

10. Pursuant to §§ 111 and 114 of the Act, EPA promulgated the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 C.F.R. Part 60 Subpart Dc, 40 C.F.R. §§ 60.40c - 60.48c (NSPS Subpart Dc); 55 *Fed. Reg.* 37683 (September 12, 1990).

11. Pursuant to 40 C.F.R. § 60.1(a), the provisions of Part 60 apply to the owner or operator of any stationary source that contains an affected facility, the construction or modification of which is commenced after the date of publication in Part 60 of any standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility.

12. 40 C.F.R. § 60.2 defines “owner or operator” as “any person who owns, leases, operates, controls, or supervises an affected facility or stationary source of which an affected facility is part.”

13. Pursuant to 40 C.F.R. § 60.7(f) an owner or operator subject to any NSPS regulation must maintain a file of all information required by applicable NSPS regulations in a permanent form suitable for inspection.

14. An owner or operator of an affected facility subject to NSPS Subpart Dc must comply with the requirements of 40 C.F.R. Part 60 Subpart A, unless otherwise specified in NSPS Subpart Dc. See 40 C.F.R. § 60.7(h).

15. 40 C.F.R. § 60.40c(a), defines an NSPS Subpart Dc “affected facility,” as “each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 MW (100 mmBtu/hr) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr).”

16. 40 C.F.R. § 60.41c defines steam generating unit,” as “a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system.” The definition also provides that the term “steam generating unit” does not include process heaters as defined in Subpart Dc.

17. 40 C.F.R. § 60.41c defines “process heater” as “a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.”

18. 40 C.F.R. § 60.41c defines “residual oil” as “crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, ‘Standard Specification for Fuel Oils’ (incorporated by reference—see 40 C.F.R. § 60.17).”

19. Pursuant to 40 C.F.R. § 60.42c(d), an owner or operator of an affected facility that combusts oil must combust oil in the affected facility that contains less than 0.5 weight percent sulfur.

20. Pursuant to 40 C.F.R. § 60.42c(h) and (h)(2), an owner or operator of any affected facility that combusts residual oil with a heat input capacity between 2.9 and 8.7 MW (10 and 30 mmBtu/hr) may determine compliance with NSPS Subpart Dc emission or fuel oil sulfur limits based on a certification from the fuel supplier as described under 40 C.F.R. § 60.48c(f)(1), (2), or (3), as applicable.

21. Pursuant to 40 C.F.R. § 60.46c, owners or operators are provided with alternative methods for monitoring emissions of sulfur dioxide (SO₂).

22. Pursuant to 40 C.F.R. § 60.46c(e), the monitoring requirements of § 60.46c(a) and (d) do not apply to affected facilities subject to § 60.42c(h) (1), (2) or (3) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification as described under § 60.48c(f)(1), (2), or (3), as applicable.

23. Pursuant to 40 C.F.R. § 60.48c(d), an owner or operator of an affected facility subject to the NSPS Subpart Dc SO₂ emission limits, fuel oil sulfur limits, or percent reduction limits provided in 40 C.F.R. § 60.42c must submit reports to the Administrator.

24. Pursuant to 40 C.F.R. § 60.48c(e), an owner or operator of an affected facility, subject to NSPS Subpart Dc SO₂ emission limits, fuel oil sulfur limits, or percent reduction limits provided in 40 C.F.R. § 60.43c, must keep records and submit reports as required by paragraph 40 C.F.R. § 60.48c(d) including, when applicable, the information required by 40 C.F.R. § 60.48c(e)(11).

25. Pursuant to 40 C.F.R. § 60.48c(e)(11), an owner or operator of an affected facility must keep records of fuel supplier certifications if fuel supplier certification is used to demonstrate compliance.

26. In addition to records of fuel supplier certifications, 40 C.F.R. § 60.48c(e)(11) specifies that the report, submitted pursuant to 40 C.F.R. § 60.48c(d), must include a certified statement, signed by the owner or operator of the affected facility, that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

27. Pursuant to 40 C.F.R. § 60.48c(f)(2), a fuel supplier certification for residual oil must include the following information: (i) the name of the oil supplier; (ii) the location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to the affected facility, or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location; (iii) the sulfur content of the oil from which the shipment came (or of the shipment itself); and (iv) the method used to determine the sulfur content of the oil.

28. Prior to June 13, 2007, 40 C.F.R. § 60.48c(g) provided that an owner or operator of an affected facility must record and maintain records of the amounts of each fuel combusted during each operating day.

29. On June 13, 2007 (72 Fed. Reg. 32710), EPA revised the recordkeeping requirements of 40 C.F.R. § 60.48c(g), in pertinent part, as follows:

40 C.F.R. § 60.48c(g)(1): except as provided under paragraphs (g)(2) and (g)(3) of this section, "the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day."

40 C.F.R. § 60.48c(g)(2): "As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, or fuels using fuel certification in § 60.48c(f) to demonstrate compliance with the SO₂ standards may elect to record and maintain records of the amount of fuel combusted each calendar month."

30. Pursuant to 40 C.F.R. § 60.48c(i), all records required under 40 C.F.R. § 60.48c, must be maintained by the owner or operator of the affected facility for a period of two (2) years following the date of such record.

31. Pursuant to 40 C.F.R. § 60.48c(j), the reporting period for the reports required under NSPS Subpart Dc is each six-month period and all reports must be submitted to the Administrator and must be postmarked by the 30th day following the end of the reporting period.

Findings of Fact

32. Respondent is a domestic business corporation registered in the State of New York.

33. Respondent and Complainant entered into a Consent Agreement and Final Order (CAA-02-2008-1220), on July 21, 2009 in another matter, which included a settlement condition requiring Grenadier to complete an audit by an outside consultant of all properties owned and/or operated by Grenadier (Facilities' Audit) to evaluate the individual facilities' compliance with 40 C.F.R. Part 60 Subpart A and Subpart Dc, 40 C.F.R. §§ 60.40c – 60.48c.

34. In the July 21, 2009 Consent Agreement and Final Order (CAA-02-2008-1220) Grenadier and EPA agreed upon the following penalty schedule for any violations found as a result of the Facilities Audit:

Lateness Duration	a – Notification Failure	b – Failure to submit semi-annual reports	c – Failure to record and maintain records	d – Size of Violator
Years	§ 60.48c(a)	§ 60.48c(d), (e) & (f)	§ 60.48c(g)	Per facility
0-1	\$ 6,488	\$ 9,671	\$ 9,671	\$1,612
1-2	\$ 9,671	\$ 12,895	\$ 12,895	\$1,612
2-3	\$ 12,895	\$ 16,119	\$ 16,119	\$1,612
3-4	\$ 16,119	\$ 19,343	\$ 19,343	\$1,612
4-5	\$ 19,343	\$ 22,566	\$ 22,566	\$1,612

35. Pursuant to the July 21, 2009 Consent Agreement and Final Order, Terranext, LLC was approved by EPA to perform the Facilities Audit.

36. The results of the Facilities Audit performed by Terranext, LLC were reported to EPA on January 15, 2010 (Audit Report).

Bay Park 1

37. The Audit Report indicates that on October 26, 2009, Terranext, LLC completed a field audit of Bay Park 1 (Bay Park Facility), a facility comprised of three buildings, located at 3325 Neptune Avenue, Brooklyn, New York, to determine the compliance status with respect to NSPS Subparts A and Dc.

38. The Audit Report indicates that the Bay Park Facility is owned by Bay Park One Company and operated by Grenadier.

39. The Audit Report indicates that there is one boiler room and two boilers at the Bay Park Facility, which were installed in 1994 although a chart in the Audit Report indicates that the boilers at the Bay Park Facility were installed in 1995..

40. The Audit Report indicates that the boilers utilize natural gas as a primary fuel and #2-oil as a secondary fuel.

41. The Audit Report indicates that according to the manufacturer of the boilers, the gross heat input for the boilers is 10.461 million Btu per hour (mmBtu/hr).

42. The Audit Report indicates that the maximum fuel consumption rate for the boilers is 75 gallons per hour and 10,500 cubic feet per hour.

43. The Audit Report indicates among other things, the following information about the two (2) boilers at the Bay Park Facility:

Boiler #	Make	Model	Installation Date	Primary Fuel	Secondary Fuel
1	Burnham	SNSL-250-500GO-GP	1995	Natural Gas	#2 Oil
2	Burnham	SNSL-250-500GO-GP	1995	Natural Gas	#2 Oil

44. The Audit Report indicates that the Bay Park Facility is subject to NSPS Subpart Dc, 40 C.F.R. §§ 60.40c – 60.48c, based on:

- a. the year of installation of the two boilers – October 1994; and
- b. the heat input rating of each boiler – between 10 and 100 mmBtu/hr or 10.5 mmBtu/hr, depending on whether the boiler is firing primary or secondary fuels.

45. The Audit Report indicates that the Bay Park Facility has no records of the amounts of each fuel combusted during each operating day from 1995 – 2009.

46. The Audit Report indicates that two (2) fuel meters, one for each boiler, were purchased via a purchase order dated March 4, 2008, and the invoice for installation of the meters is dated February 13, 2009.

47. The Audit Report indicates that the earliest record of fuel consumption at the Bay Park Facility is dated February 1, 2009.

48. The Audit Report indicates that the field audit conducted on October 26, 2009 revealed that the Bay Park Facility is currently in compliance with 40 C.F.R. Part 60 Subpart A and Subpart Dc, 40 C.F.R. §§ 60.40c – 60.48c.

Park Lane

49. The Audit Report indicates that on November 6, 2009, Terranext, LLC completed a field audit of Park Lane (Park Lane Facility), a facility comprised of one building, located at 1965 Lafayette Avenue, Bronx, New York, to determine the compliance status with respect to NSPS Subparts A and Dc.

50. The Audit Report indicates that the Park Lane Facility is owned by Park Lane Residence Company and operated by Grenadier:

51. The Audit Report indicates that there is one boiler room and two boilers at the Park Lane Facility, which were installed circa 1969.

52. The Audit Report indicates that the boilers utilize #6 fuel oil as the primary fuel and have no secondary fuel.

53. The Audit Report indicates that new burners were installed on each boiler in 2005.

54. The Audit Report indicates that according to the Certificate to Operate the original burners, the gross heat input for the boilers and original burners was 14.4 mmBtu/hr.

55. The Audit Report indicates that the maximum fuel rate for the boilers and original burners was 120 gallons per hour, and a heat rating for #6-oil of 140,000 Btu per gallon.

56. The Audit Report indicates that according to the "Certificate to Operate" the new burners installed in 2005, the gross heat input is 17.9 mmBtu/hr, and a maximum fuel rate of 128 gallons per hour (gph).

57. The Audit Report calculates the actual gross heat input for the boilers and original burners as 16.8 mmBtu/hr to determine compliance, however the new burners installed in 2005 caused an increase from 16.8 mmBtu/hr to 17.9 mmBtu/hr.

58. The Audit Report, amount other things, indicates the following information about the two (2) boilers at the Park Lane Facility:

Boiler #	Make	Model	Installation Date	Primary Fuel	Maximum Fuel Rate
1	Federal	FLR	1969/2005 new burners	#6	128 gph
2	Federal	FLR	1969/2005 new burners	#6	128 gph

59. An analysis of the Audit Report by EPA provides that the Park Lane Facility is subject to NSPS Subpart Dc, 40 C.F.R. §§ 60.40c – 60.48c, based on:

- a. A modification to the boilers after June 9, 1989, i.e. the installation of new burners in 2005; and
- b. the heat input rating of each boiler is between 10 and 100 mmBtu/hr.

60. The Audit Report indicates that the Park Lane Facility has no records of the amounts of each fuel combusted during each operating day from 2005 – 2009.

61. Grenadier does not contest EPA's findings above.

Conclusions of Law

62. Paragraphs 1- 61 are re-alleged and incorporated herein by reference.

63. From the Findings of Fact set forth above, EPA finds that Respondent is a "person" within the meaning of § 302(e) of the Act.

64. From the Findings of Fact set forth above EPA finds that Respondent operates two (2) steam generating units at the Bay Park Facility within the meaning of 40 C.F.R. § 60.41c(a), each of which is an affected facility within the meaning of 40 C.F.R. § 60.40c(a).

65. From the Findings of Fact set forth above EPA finds that Respondent operates two (2) steam generating units at the Park Lane Facility within the meaning of 40 C.F.R. § 60.41c(a), each of which is an affected facility within the meaning of 40 C.F.R. § 60.40c(a).

66. From the Findings of Fact set forth above EPA finds that Respondent, as operator of the Bay Park and Park Lane Facilities is subject to the NSPS General Provisions and NSPS Subpart Dc.

67. From the Findings of Fact set forth above, EPA finds that by failing to submit semi-annual NSPS Subpart Dc reports from 1995 until 2009, Respondent was unable to fully demonstrate compliance for that period with 40 C.F.R. § 60.42c limits at the Bay Park Facility.

68. From the Findings of Fact set forth above, EPA finds that by failing to submit semi-annual NSPS Subpart Dc reports from 2005 until 2010, Respondent was unable to fully demonstrate compliance for that period with 40 C.F.R. § 60.42c at the Park Lane Facility.

69. From the Findings of Fact set forth above, EPA finds that Respondent's failures to submit notifications and semi-annual NSPS Subpart Dc reports for the stated periods are violations of 40 C.F.R. §§ 60.48c (a), (d), (e) and (j) and violations of §§ 111 and 114 of the Act.

70. From the Findings of Fact set forth above EPA finds that Respondent's failure to install and use meters, which would enable monitoring of fuel use, resulted in Respondent's inability to record and maintain records of the amount of each fuel combusted at each affected facility.

71. Respondent's failures to record and maintain records of daily or monthly,

as appropriate, fuel usage for the stated time periods in Paragraphs 67 and 68, are violations of 40 C.F.R. §§ 60.7, 60.48c(g), and 60.48c(i) and violations of §§ 111 and 114 of the Act.

Consent Agreement

Based on the foregoing, and in accordance with federal laws and regulations, it is agreed that:

72. Pursuant to § 113(d) of the Act, a previous Consent Agreement and Final Order (CAA-02-2008-1220), and this CAFO, Respondents shall pay a penalty of \$66,087 for the Bay Park Facility and \$66,087 for the Park Lane Facility for a total administrative penalty of **\$132,174**, calculated in accordance with the penalty schedule agreed upon in the previous CAFO and reiterated in paragraph 34 of this CAFO.

73. Respondents shall have the option of paying the entire **\$132,174**, either by corporate, cashiers, or certified check within thirty (30) days from the date of issuance of the attached Final Order (Due Date). Respondent shall: (1) clearly type or write the docket number (CAA-02-2010-1234) on the check to ensure proper payment; (2) make the check payable to the order of "Treasurer, United States of America;" and (3) send the check to:

U.S. Environmental Protection Agency
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

Respondent shall send notice of payment to the following individuals:

Kenneth Eng, Air Compliance Branch Chief
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 2
290 Broadway – 21st Floor
New York, New York 10007

and

Flaire Hope Mills, Air Branch Chief
Office of Regional Counsel
U.S. Environmental Protection Agency – Region 2
290 Broadway – 16th Floor
New York, New York 10007

74. If Respondents fail to make full and complete payment of the **\$132,174** penalty that is required by this CAFO, this case may be referred by EPA to the United States Department of Justice and/or the United States Department of the Treasury for collection. In such an action, pursuant to § 113(d)(5) of the CAA, 42 U.S.C.

§ 7413(d)(5) and 31 U.S.C. § 3717, Respondents shall pay the following amounts:

- a. Interest. If Respondents fail to make payment, or make partial payment, any unpaid portion of the assessed penalty shall bear interest at the rate established pursuant to 31 U.S.C. § 3717 and 26 U.S.C. § 6621 from the payment Due Date.
- b. Handling Charges. Pursuant to 31 U.S.C. § 3717(e)(1), a monthly handling charge of fifteen dollars (\$15.00) shall be paid if any portion of the assessed penalty is more than thirty (30) days past the payment Due Date.
- c. Attorney Fees, Collection Costs, Nonpayment of Penalty. If Respondents fail to pay the amount of an assessed penalty on time, pursuant to 42 U.S.C. § 7413(d)(5), in addition to such assessed penalty and interest and handling assessments, Respondents shall also pay the United States' enforcement expenses, including but not limited to attorney fees and costs incurred by the United States for collection proceedings, and a quarterly nonpayment penalty for each quarter during which such a failure to pay persists. Such nonpayment penalty shall be ten percent of the aggregate amount of Respondents' outstanding penalties and nonpayment penalties accrued from the beginning of such quarter.

75. This Consent Agreement is being entered into voluntarily and knowingly by the parties in full settlement of Respondent's alleged violations of the Act set forth herein.

76. Respondent has read the Consent Agreement and consents to the terms and issuance as a Final Order.

77. This Consent Agreement and attached Final Order constitute a settlement by EPA of all claims for civil penalties pursuant to the Clean Air Act for findings of violations alleged in this Consent Agreement. Nothing in this Consent Agreement and attached Final Order is intended to nor shall be construed to operate in any way to resolve any criminal liability of the Respondent, or to affect the right of the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law. Compliance with this Consent Agreement and attached Final Order shall not be a defense to any actions subsequently commenced pursuant to Federal laws and regulations administered by EPA, and it is the responsibility of the Respondent to comply with such laws and regulations.

78. Respondent explicitly waives its right to request a hearing and/or contest allegations in this Consent Agreement and explicitly waives its right to appeal the attached Final Order.

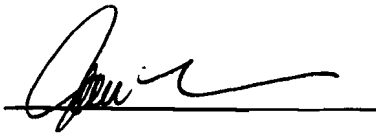
79. Respondent waives any right it may have pursuant to 40 C.F.R. § 22.08 to be present during discussions with, or to be served with and to reply to any memorandum or communication addressed to, the Regional Administrator or the Deputy Regional Administrator where the purpose of such discussion, memorandum, or communication is to recommend that such official accept this Consent Agreement and issue the attached Final Order.

80. Each party to this Consent Agreement shall bear its own costs and attorneys' fees in this action resolved by this Consent Agreement and attached Final Order.

81. The Consent Agreement and attached Final Order shall be binding on Respondent and its successors and assignees.

82. Each of the undersigned representative(s) to this Consent Agreement certifies that he or she is duly authorized by the party whom he or she represents to enter into the terms and conditions of this Consent Agreement and bind that party to it.

For Respondent:



Jane H. Kruger, President
Grenadier Realty Corporation
Brooklyn, NY 11239

Date 9/13/10

For Complainant:



Dore LaPosta, Director
Division of Enforcement and
Compliance Assistance
United States Environmental
Protection Agency, Region 2

Date 9/15/10

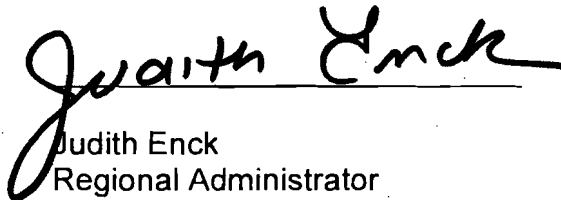
In the Matter of Grenadier Realty Corporation
CAA-02-2010-1234

FINAL ORDER

The Regional Administrator of EPA, Region 2, concurs in the foregoing Consent Agreement, in the matter of Grenadier Realty Corporation, CAA-02-2010-1234. The Consent Agreement, entered into by the parties, is hereby approved and issued, as a Final Order, effective immediately.

DATE: _____

9/17/10



Judith Enck
Regional Administrator
U.S. Environmental Protection
Agency – Region 2

bcc: M. Quintin, ORC-AB
Team Leader, ORC-AB
F. Mills, ORC-AB – Chron File
R. Hughes, DECA-ACB
G. LaVigna, DECA-ACB
K. Eng, DECA-ACB
DECA ACB Source File