

FILED

January 15, 2026

3:42PM

**U.S. EPA REGION 7
HEARING CLERK**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219**

IN THE MATTER OF:

WASTE CORPORATION OF KANSAS,
LLC

Respondent.

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Docket No. CAA-07-2024-0107

CONSENT AGREEMENT

I. PRELIMINARY STATEMENT

1. This is an administrative penalty assessment proceeding brought under Section 113(d) of the Clean Air Act (“CAA”), 42 U.S.C. § 7413(d), and Sections 22.13 and 22.18 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. Complainant is the United States Environmental Protection Agency, Region 7 (the “EPA”). On the EPA’s behalf and as delegated by the Administrator of the EPA and the Regional Administrator of Region 7, the Director of the Enforcement and Compliance Assurance Division is delegated the authority to settle civil administrative penalty proceedings under Section 113(d) of the CAA.

3. Respondent is Waste Corporation of Kansas, LLC, which is incorporated under the laws of the state of Delaware and is authorized to do business in Kansas.

4. Complainant and Respondent, having agreed that settlement of this action is in the public interest, consent to the entry of this consent agreement (“Consent Agreement” or “Agreement”) and the attached final order (“Final Order” or “Order”) without adjudication of any issues of law or fact herein, and Respondent agrees to comply with the terms of this Consent Agreement and Final Order.

II. JURISDICTION

5. This Consent Agreement is entered into under Section 113(d) of the CAA, as amended, 42 U.S.C. § 7413(d), and the Consolidated Rules, 40 C.F.R. Part 22. The alleged violations in this Consent Agreement are enforced pursuant to Section 113(a)(1)(B) and 113(a)(3)(A).

6. The Regional Judicial Officer is authorized to ratify this Consent Agreement which memorializes a settlement between Complainant and Respondent. 40 C.F.R. §§ 22.4(a) and 22.18(b).

7. The issuance of this Consent Agreement and attached Final Order simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).

8. The EPA Administrator and the United States Attorney General, through their delegated representatives, have jointly determined that this administrative penalty action is appropriate for a larger penalty amount or longer period of violation than the time and penalty limitations set forth in Section 113(d) of the CAA.

III. GOVERNING LAW

9. The Clean Air Act establishes a regulatory framework designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population. 42 U.S.C. § 7401.

10. Section 111 of the CAA, 42 U.S.C. § 7411, requires the EPA to develop technology-based standards that apply to specific categories of stationary sources. The New Source Performance Standards (NSPS) apply to new, modified, and reconstructed affected facilities in specific source categories. The NSPS are developed and implemented by the EPA and are delegated to the states. However, even when delegated to the states, the EPA retains authority to implement and enforce the NSPS.

11. Pursuant to the authority granted under Section 111 of the CAA, 42 U.S.C. § 7411, the EPA promulgated general regulations applicable to all NSPS source categories in 40 C.F.R. Part 60, Subparts A, B, and C. In addition, the EPA promulgated regulations set forth at 40 C.F.R. Part 60, Subpart WWW, which apply to municipal solid waste landfills that commence construction, reconstruction, or modification on or after May 30, 1991.

12. NSPS Subpart WWW applies to affected facilities in the municipal solid waste (MSW) industry that commence construction, reconstruction or modification on or after May 30, 1991, but before July 18, 2014 and provides compliance options for MSW landfills with a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³), and a calculated nonmethane organic compound (NMOC) emission generation rate equal to or greater than 50 megagrams per year (Mg/yr). An affected facility may install and operate a gas collection and control system (GCCS) that captures the landfill gas in accordance with the requirements of the NSPS.

13. In 2016, the EPA revised the NSPS and emission guidelines for MSW landfills at 40 C.F.R. Part 60, Subpart XXX and 40 C.F.R. Part 60, Subpart Cf, respectively. *See* 81 Fed. Reg. 59332 (Aug. 29, 2016); 81 Fed. Reg. 59276 (Aug. 29, 2016). The revised emission guidelines required states to submit state plans implementing the emission guidelines by May 30, 2017.

14. On February 29, 2020, the EPA found that 42 states and territories, including Kansas, failed to submit state plans implementing the MSW landfill emission guidelines. 85 Fed. Reg. 14474 (Feb. 29, 2020). As a result of this failure, the EPA promulgated a MSW Landfill Federal Plan implementing the emission guidelines, which are set forth at 40 C.F.R. Part 62, Subpart OOO “Subpart OOO”.

15. Subpart OOO applies to each MSW landfill that commenced construction, reconstruction, or modification prior to July 17, 2014, and has not been modified or reconstructed since then, and has accepted waste since November 8, 1987, or has capacity for future waste deposition. Existing landfills that were subject to 40 C.F.R. Part 60, Subpart WWW became subject to Subpart OOO.

16. Subpart OOO sets forth operational standards for gas collection and control systems. *See* 40 C.F.R. § 62.16716.
17. Section 111(e) of the CAA, 42 U.S.C. § 7411(e), prohibits any person from operating any source in violation of any NSPS standard applicable to such source after the effective date of the NSPS.
18. Title V of the CAA, 42 U.S.C. §§ 7661-7661f, establishes an operating permit program for major sources of air pollution.
19. Section 502(d) of the CAA, 42 U.S.C. § 7661a(d), requires each state to develop and submit a permit program meeting the requirements of Title V for approval by the EPA.
20. Under 40 C.F.R. § 70.6(b), all terms and conditions contained in a permit issued under a permit program approved pursuant to the Title V are federally enforceable under Section 113 of the CAA, 42 U.S.C. § 7413, unless the term or condition is not required under the CAA.
21. On January 30, 1996, the EPA approved the Kansas Class I Operating Permit Program, Kansas Rules K.A.R. 28-19-510 – K.A.R. 28-19-518, pursuant to subchapter V of the CAA. *See* 61 Fed. Reg. 2938 (Jan. 30, 1996).
22. Subpart OOO and K.A.R. 28-19-722(d) require the owner or operator of a MSW landfill subject to the NSPS with a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters to comply with Part 70 permitting requirements.
23. Pursuant to Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), it is unlawful for any person to, among other things, operate a major source subject to Title V except in compliance with a Title V permit after the effective date of any permit program approved or promulgated under Title V of the Act.
24. Section 113(d) of the CAA, 42 U.S.C. § 7413(d), authorizes the Administrator to issue an administrative order against any person assessing a civil penalty of up to \$25,000 per day of violation whenever, on the basis of any available information, the Administrator finds that such person has violated or is violating any requirement or prohibition of the CAA referenced therein, including Section 111, and the implementing regulations. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, as amended, and the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, 28 U.S.C. § 2461, and implementing regulations at 40 C.F.R. Part 19, increased these statutory maximum penalties to \$59,114 for violations that occur after November 2, 2015, and for which penalties are assessed on or after January 8, 2025.

IV. FACTUAL ALLEGATIONS

25. Respondent is, and at all times referred to herein was, a “person” as defined by Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
26. At all times pertinent to this action, Respondent Waste Corporation of Kansas, LLC, was the “owner” and/or “operator” of a municipal solid waste landfill located at 1150 E 700th Ave, Arcadia, Kansas 66711 (the “Oak Grove Landfill” or “Facility”) within the meaning of Section 111(a)(5) of the Act, 42 U.S.C. § 7411(a)(5).

27. At all times pertinent to this action, the Facility was a “stationary source” as defined by Section 111(a)(3) of the Act, 42 U.S.C. § 7411(a)(3).

28. At all times pertinent to this action, Respondent operated a disposal facility in a contiguous space where household waste was placed in or on the land, and is, therefore, a “municipal solid waste landfill” as defined by 40 C.F.R. § 62.16730.

29. The Facility is subject to the provisions of the Federal Plan at 40 C.F.R. Part 62, Subpart OOO, because it is a MSW landfill that commenced construction, reconstruction, or modification on or before July 17, 2014, and accepted waste at any time since November 8, 1987. 40 C.F.R. § 62.16711(a).

30. At all times pertinent to this action, the Facility had a capacity greater than 2.5 million megagrams and 2.5 million cubic meters, and was therefore a designated facility required to obtain a Class I operating permit pursuant to 40 C.F.R. § 62.16711(e).

31. The Facility’s initial Kansas Class I Operating Permit was issued on June 26, 2002. The permit was last renewed on January 18, 2022, and expires on January 17, 2027.

32. In November 2004, Tier II testing showed that the Facility exceeded the 50 Mg/year emission rate for NMOC. Per 40 C.F.R. § 60.752(b)(2)(i), if the calculated NMOC emission rate is greater than 50 Mg/yr, the owner or operator must submit a Gas Collection and Control System (GCCS) Design Plan within one year.

33. Respondent submitted a GCCS Design Plan to the Kansas Department of Health and Environment (KDHE) in March of 2006.

34. On June 9, 2006, KDHE approved the revised Design Plan.

35. On November 18, 2022, the EPA conducted an on-site inspection of the Facility.

36. On November 6, 2023, the EPA issued a request for information (“2023 Request for Information”) to the facility pursuant to Section 114 of the CAA, 42 U.S.C. § 7414.

37. On December 19, 2023, Respondent submitted its response to the 2023 Request for Information.

38. On August 28, 2024, the EPA issued a Finding of Violation concerning alleged violations of Subpart OOO at the facility.

V. ALLEGED VIOLATIONS OF LAW

39. Complainant hereby states and alleges that Respondent has violated the CAA and federal regulations promulgated thereunder as follows:

COUNT 1

40. Paragraphs 1 through 38 are incorporated by reference herein.

41. The regulation at 40 C.F.R. § 62.16720(c)(5) requires the owner or operator to implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.

42. The regulation at 40 C.F.R. § 62.16724(d)(5) requires the owner or operator to comply with the GCCS Design Plan.

43. Respondent's GCCS Design Plan describes Respondent's program for monitoring cover integrity, and states that Respondent will document inspections on a monthly cover integrity inspection form.

44. According to the response to the 2023 Request for Information, Respondent failed to document monthly cover integrity inspections for all of calendar year 2021, and 10 months of calendar year 2022.

45. Respondent's failure to comply with the GCCS Design Plan by failing to document monthly cover integrity inspections is a violation of 40 C.F.R. § 62.16724(d)(5) and Section 111(e) of the CAA, 42 U.S.C. § 7411(e).

COUNT II

46. Paragraphs 1 through 38 are incorporated by reference herein.

47. The regulation at 40 C.F.R. § 62.16720(c)(4)(ii) requires the owner or operator to perform cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in the vicinity of each location that emits methane at a concentration that exceeds 500 parts per million (ppm) above background within 10 days of detecting an exceedance.

48. The EPA's inspection revealed that Respondent detected methane emissions that exceeded 500 ppm above background at two separate locations on February 15, 2022.

49. According to the response to the 2023 Request for Information, Respondent did not perform cover maintenance or adjustments to the vacuum of adjacent wells until after March 4, 2022, and each location continued to emit methane exceeding 500 ppm above background until June 2, 2022.

50. Respondent's failure to perform cover maintenance or adjustments to the vacuum of adjacent wells within 10 days of detecting a methane exceedance is a violation of 40 C.F.R. § 62.16720(c)(4)(ii) and Section 111(e) of the CAA, 42 U.S.C. § 7411(e).

COUNT III

51. Paragraphs 1 through 38 are incorporated by reference herein.

52. The regulation at 40 C.F.R. § 62.16720(c)(4)(v) requires the owner or operator to install a new well or other collection device within 120 days of the initial exceedance, or submit an alternative remedy for approval to the Administrator, for each location that emits methane at a concentration that exceeds 500 parts per million above background three times within a quarter.

53. The EPA's inspection revealed that Respondent detected methane exceedances at two separate locations on February 15, 2022, February 23, 2022, and March 4, 2022 (*i.e.*, three times within a quarter).

54. According to the response to the 2023 Request for Information, Respondent did not install a new well or other collection device at each exceedance location within 120 days of the initial exceedance, or submit an alternative remedy for approval to the Administrator.

55. Respondent's failure to install a new well or other collection device within 120 days of the initial exceedance, or submit an alternative remedy for approval to the Administrator at two separate exceedance locations, is a violation of 40 C.F.R. § 62.16720(c)(4)(v) and Section 111(e) of the CAA, 42 U.S.C. § 7411(e).

COUNT IV

56. Paragraphs 1 through 38 are incorporated by reference herein.

57. The regulation at 40 C.F.R. § 62.16720(c)(4)(v) requires the owner or operator to install a new well or other collection device within 120 days of the initial exceedance, or submit an alternative remedy for approval to the Administrator, for each location that emits methane at a concentration that exceeds 500 parts per million above background three times within a quarter.

58. According to the response to the 2023 Request for Information, Respondent detected a methane exceedance at one location on September 11, 2023, September 12, 2023, September 22, 2023, and November 21, 2023. Respondent did not install a new well or other collection device at the exceedance location or submit an alternative remedy for approval to the Administrator.

59. Respondent's failure to install a new well or other collection device within 120 days of the initial exceedance, or submit an alternative remedy for approval to the Administrator is a violation of 40 C.F.R. § 62.16720(c)(4)(v) and Section 111(e) of the CAA, 42 U.S.C. § 7411(e).

VI. TERMS OF THE CONSENT AGREEMENT

60. Respondent consents to the issuance of this Consent Agreement and Final Order. In addition, for the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:

- (a) admits the jurisdictional allegations set forth herein;

- (b) neither admits nor denies the factual allegations stated herein;
- (c) consents to the assessment of a civil penalty as stated herein;
- (d) consents to the issuance of any specified compliance or corrective action order as provided herein;
- (e) consents to the conditions specified herein;
- (f) consents to any stated Permit Action;
- (g) waives any right to contest the allegations set forth herein; and
- (h) waives its rights to appeal the Order accompanying this Agreement.

61. 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.

62. Respondent consents to the issuance of this Consent Agreement and Final Order and consents for the purposes of settlement to the payment of the civil penalty specified herein.

63. Respondent and the EPA agree to conciliate this matter without the necessity of a formal hearing and to bear their respective costs and attorneys' fees.

64. The parties consent to service of this Consent Agreement and Final Order electronically at the following e-mail addresses: *meyer.jonathan@epa.gov* (for Complainant) *shoboy@gflenv.com* and *mbachhuber@gflenv.com* (for Respondent). Respondent understands that the Consent Agreement and Final Order will become publicly available upon filing.

Penalty Payment

65. Respondent agrees that, in settlement of the claims alleged herein, Respondent shall pay a civil penalty of one hundred forty-six thousand eight hundred ninety-four dollars (\$146,894) as set forth below.

66. Respondent shall pay the penalty within thirty (30) days of the effective date of the Final Order. Such payment shall identify Respondent by name and docket number and shall be made using any payment method provided at <http://www.epa.gov/financial/makepayment>. For instructions for wire transfers and additional information, see <https://www.epa.gov/financial/additional-instructions-making-payments-epa>.

67. Confirmation of payment shall simultaneously be sent to the following:

Regional Hearing Clerk
R7_Hearing_Clerk_Filings@epa.gov; and

Jonathan Meyer, Attorney
meyer.jonathan@epa.gov

68. Respondent understands that its failure to timely pay any portion of the civil penalty may result in the commencement of a civil action in Federal District Court to recover the full remaining balance, along with penalties and accumulated interest. In such case, interest shall begin to accrue on a civil or stipulated penalty from the date of delinquency until such civil or stipulated penalty and any accrued interest are paid in full. 31 C.F.R. § 901.9(b)(1). Interest will be assessed at a rate of the United States Treasury Tax and loan rates in accordance with 31 U.S.C. § 3717. Additionally, a charge will be assessed to cover the costs of debt collection including processing and handling costs, and a non-payment penalty charge of six (6) percent per year compounded annually will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. 31 U.S.C. § 3717(e)(2).

69. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, the EPA is required to send to the Internal Revenue Service (“IRS”) annually, a completed IRS Form 1098-F (“Fines, Penalties, and Other Amounts”) with respect to any court order or settlement agreement (including administrative settlements) that require a payor to pay an aggregate amount that the EPA reasonably believes will be equal to, or in excess of, \$50,000 for the payor’s violation of any law or the investigation or inquiry into the payor’s potential violation of any law, including amounts paid for “restitution or remediation of property” or to come “into compliance with a law.” The EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (i.e., a copy of IRS Form 1098-F). Respondent’s failure to provide IRS Form W-9 or Tax Identification Number (“TIN”), as described below, may subject Respondent to a penalty, per 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1. To provide the EPA with sufficient information to enable it to fulfill these obligations, Respondent herein agrees that:

- a. Respondent shall complete an IRS Form W-9 (“Request for Taxpayer Identification Number and Certification”), which is available at <https://www.irs.gov/pub/irs-pdf/fw9.pdf>.
- b. Respondent shall therein certify that its completed IRS Form W-9 includes Respondent’s correct TIN or that Respondent has applied and is waiting for issuance of a TIN.
- c. Respondent shall email its completed Form W-9 to EPA’s Cincinnati Finance Division at sherrer.dana@epa.gov within 30 days after the Final Order ratifying this Agreement is filed. The EPA recommends encrypting IRS Form W-9 email correspondence; and
- d. In the event that Respondent has certified in its completed IRS Form W-9 that it does not yet have a TIN but has applied for a TIN, Respondent shall provide EPA’s Cincinnati Finance Division with Respondent’s TIN, via email, within five (5) days of Respondent’s receipt of a TIN issued by the IRS.

**VII. EFFECT OF CONSENT AGREEMENT
AND ATTACHED FINAL ORDER**

70. In accordance with 40 C.F.R. § 22.18(c), full payment of the penalty proposed in this Consent Agreement and Final Order resolves Respondent's liability for federal civil penalties for the violations and facts specifically alleged above.

71. The effect of settlement described in the immediately preceding paragraph is conditioned upon the accuracy of Respondent's representations to the EPA, as memorialized in the paragraph directly below.

72. Respondent certifies by the signing of this Consent Agreement that it is presently in compliance with all requirements of the CAA and its implementing regulations.

73. Full payment of the penalty proposed in this Consent Agreement 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 law. This Consent Agreement and Final Order does not waive, extinguish, or otherwise affect Respondent's obligation to comply with all applicable provisions of the CAA and regulations promulgated thereunder.

74. By signing this Agreement, the undersigned representative of Complainant and the undersigned representative of Respondent each certify that they are fully authorized to execute and enter into the terms and conditions of this Agreement and have the legal capacity to bind the party they represent to this Agreement.

75. The provisions of this Agreement shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assigns. Respondent shall ensure that all contractors, employees, consultants, firms, or other persons acting for Respondent with respect to matters included herein comply with the terms of this Consent Agreement and Final Order.

76. This Agreement constitutes the entire agreement and understanding of the parties and supersedes any prior agreements or understandings, whether written or oral, among the parties with respect to the subject matter hereof.

77. The terms, conditions and compliance requirements of this Agreement may not be modified or amended except upon the written agreement of both parties, and approval of the Regional Judicial Officer.

78. Any violation of this Order may result in a civil judicial action for an injunction or civil penalties of up to \$124,426 per day per violation, or both, as provided in Section 113(b)(2) of the CAA, 42 U.S.C. § 7413(b)(2), and adjusted for inflation pursuant to 40 C.F.R. Part 19, as well as criminal sanctions as provided in Section 113(c) of the CAA, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this Order in an administrative, civil judicial, or criminal action.

79. Nothing in this Agreement shall relieve Respondent of the duty to comply with all applicable provisions of the CAA and other federal, state, or local laws or statutes, 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, or determination of, any issue related to any federal, state, or local permit.

80. Nothing herein shall be construed to limit the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.

VIII. EFFECTIVE DATE

81. Respondent and Complainant agree to issuance of the attached Final Order. Upon filing, the EPA will transmit a copy of the filed Consent Agreement to the Respondent. This Consent Agreement and attached Final Order shall become effective after execution of the Final Order by the Regional Judicial Officer on the date of filing with the Hearing Clerk.

82. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

The foregoing Consent Agreement in the matter of Waste Corporation of Kansas, LLC, Respondent, EPA Docket No. CAA-07-2024-0107, is Hereby Stipulated, Agreed, and Approved for Entry.

FOR RESPONDENT

Waste Corporation of Kansas, LLC:

Ben Seiferman
Signature

1/12/26
Date

Printed Name: BEN SEIFERMAN

Title: REGIONAL VICE PRESIDENT

Address: 1150 EAST 700 AVE, ARCADIA, KS 66711

Respondent's Federal Tax Identification Number: _____

The foregoing Consent Agreement in the matter of Waste Corporation of Kansas, LLC, Respondent, EPA Docket No. CAA-07-2024-0107, is Hereby Stipulated, Agreed, and Approved for Entry.

FOR COMPLAINANT:

U.S. Environmental Protection Agency Region 7

DATE

Alyse Stoy, Acting Director
Enforcement and Compliance Assurance Division
U.S. EPA Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

DATE

Jonathan Meyer, Senior Counsel
Office of Regional Counsel
U.S. EPA Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

FINAL ORDER

Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(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, the foregoing Consent Agreement resolving this matter is hereby ratified and incorporated by reference into this Final Order.

Respondent is ORDERED to comply with all of the terms of the Consent Agreement. In accordance with 40 C.F.R. § 22.31(b), 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.

IT IS SO ORDERED.

Karina Borromeo
Regional Judicial Officer

Date

CERTIFICATE OF SERVICE
(to be completed by EPA)

I certify that that a true and correct copy of the foregoing Consent Agreement and Final Order in the matter of Waste Corporation of Kansas, LLC, Respondent, EPA Docket No. CAA-07-2024-0107, was sent this day in the following manner to the addressees:

Copy via E-mail to Complainant:

Jonathan Meyer
Office of Regional Counsel
meyer.jonathan@epa.gov

Carrie Venerable
Office of Regional Counsel
venerable.carrie@epa.gov

Avery Bowers
Enforcement and Compliance Assurance Division
bowers.avery@epa.gov

Copy via E-mail to Respondent:

Matthew Sanders
Waste Corporation of Kansas, LLC
msanders@gflenv.com

Philip L. Comella
Taft Law
PComella@taftlaw.com

Dated this _____ day of _____, _____

Signed