

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
Philadelphia, Pennsylvania 19103**

<b>In the Matter of:</b>	:	
	:	
<b>United Iron &amp; Metal, LLC</b>	:	<b>U.S. EPA Docket No. CWA-03-2023-0055</b>
<b>909 Millington Ave.</b>	:	
<b>Baltimore, MD 21223</b>	:	<b>Proceeding under Section 309(g) of the Clean</b>
	:	<b>Water Act, 33 U.S.C. § 1319(g)</b>
<b>Respondent.</b>	:	
	:	
<b>Former United Iron &amp; Metal, West</b>	:	
<b>909 Millington Ave.</b>	:	
<b>Baltimore, MD 21223</b>	:	
	:	
<b>Facility.</b>	:	

**CONSENT AGREEMENT**

**PRELIMINARY STATEMENT**

- This Consent Agreement is entered into by the Director of the Enforcement & Compliance Assurance Division, U.S. Environmental Protection Agency, Region III (“Complainant”) and United Iron & Metal, LLC (“Respondent” or “United Iron & Metal”) (collectively the “Parties”), pursuant to Section 309(g) of the Clean Water Act (“CWA” or “Act”), 33 U.S.C. § 1319(g), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation, Termination or Suspension of Permits (“Consolidated Rules of Practice”), 40 C.F.R. Part 22. Section 309(g) of the CWA, 33 U.S.C. § 1319(g), 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” or “CAFO”) resolve Complainant’s civil penalty claims against Respondent under Section 309(g) of the CWA, 33 U.S.C. § 1319(g), for the violations alleged herein.
- 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**

- The U.S. Environmental Protection Agency (“EPA”) has jurisdiction over the above-captioned matter, as described in Paragraph 1, above.
- The Consolidated Rules of Practice govern this administrative adjudicatory proceeding pursuant to 40 C.F.R. § 22.1(a)(6).

**GENERAL PROVISIONS**

- For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this CAFO.
- Except as provided in Paragraph 5, above, Respondent neither admits nor denies the specific factual allegations set forth in this CAFO.

7. Respondent agrees not to contest the jurisdiction of EPA with respect to the execution of this Consent Agreement, the issuance of the attached Final Order, or the enforcement of this CAFO.
8. 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.
9. 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.
10. Respondent shall bear its own costs and attorney's fees in connection with this proceeding.
11. Pursuant to Section 309(g)(4)(A) of the CWA, 33 U.S.C. § 1319(g)(4)(A), and 40 C.F.R. § 22.45(b), EPA is providing public notice and an opportunity to comment on the Consent Agreement prior to issuing the Final Order.

## **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

12. 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.
13. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the National Pollutant Discharge Elimination System ("NPDES") program for the discharge of pollutants from point sources to waters of the United States. The discharges are subject to specific terms and conditions as prescribed in the permit. Section 402(b) of the Act, 33 U.S.C. § 1342(b), provides for the authorization of state programs to issue NPDES permits.
14. Section 301(a) of the Act, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant by any person into waters of the U.S. except in compliance with sections 301, 302, 306, 307, 318, 402, and 404 of the Act.
15. "Pollutant" is defined as "dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water." 40 C.F.R. § 122.2. See also 33 U.S.C. § 1362(6).
16. "Discharge of a pollutant" means "[a]ny addition of any 'pollutant' or combination of pollutants to 'waters of the United States' from any 'point source.'" 40 C.F.R. § 122.2. See also 33 U.S.C. § 1362(12).
17. "Storm water" is defined as "storm water runoff, snow melt runoff, and surface runoff and drainage." 40 C.F.R. § 122.26(b)(13).
18. "Storm water discharge associated with industrial activity" means "the discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing, or raw materials storage areas at an industrial plant" and "includes, but is not limited to, storm water discharges from... material handling sites; refuse sites; sites used for the application or disposal of process waste waters...; sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and final products." 40 C.F.R. § 122.26(b)(14).
19. Section 402(p) of the CWA, 33 U.S.C. § 1342(p), and implementing regulation at 40 C.F.R. § 122.26(a)(1)(ii), require facilities discharging stormwater associated with industrial activity to obtain a permit. Under 40 C.F.R. § 122.26(c)(1), dischargers of stormwater associated with industrial activity must apply for an individual permit or seek coverage under a general permit.
20. Pursuant to Section 402(b) of the Act, 33 U.S.C. § 1342(b), the State of Maryland, through the Maryland Department of Environment ("MDE"), is authorized by EPA to administer the NPDES program in Maryland.
21. Maryland, through MDE, has incorporated the NPDES Permit program requirements of Section 402 of the CWA, 33 U.S.C. § 1342, into its state law.

22. Pursuant to the authority of the CWA, MDE issued an NPDES General Permit for Discharges of Stormwater Associated with Industrial Activities (12-SW, Registration No. MDR001216; hereinafter, the “General Permit”), on January 1, 2014.
23. The General Permit is issued for 5-year terms and requires facilities that discharge stormwater to a surface water body of the State to comply with specific requirements governing stormwater discharges associated with industrial activities.
24. MDE has administratively extended the General Permit, and permittees that are operating under the General Permit may continue to operate, to July 31, 2023.
25. The General Permit authorizes the discharge of stormwater associated with industrial activity in accordance with the provisions of the General Permit.
26. A violation of the General Permit is also a violation of the CWA and may be subject to penalties established under that statute.
27. Pursuant to Section 402(i) of the CWA, 33 U.S.C. § 1342(i), EPA retains its authority to take enforcement action within Maryland for NPDES permit violations.
28. Section 309(g) of the CWA, 33 U.S.C. § 1319(g), authorizes the assessment of administrative penalties against any person who violates any NPDES permit condition or limitation.
29. At all times relevant to this CAFO, United Iron & Metal was the permittee. At all times relevant to this CAFO, United Iron & Metal was the owner and the operator of a scrap metal processing and recycling center located at 909 Millington Ave, Baltimore, MD, 21223 (the “Facility”).
30. United Iron & Metal is a limited liability company organized and existing under the laws of the State of Maryland, and is a “person” within the meaning of Section 502(5) of the Act, 33 U.S.C. § 1362(5), that may be subject to the assessment of civil penalties for the violations alleged herein.
31. At all times relevant to this CAFO, Respondent engaged in “industrial activity” at the Facility within the meaning of 40 C.F.R. § 122.26(a)(1)(ii).
32. Respondent had applied for and was granted coverage under the General Permit, NPDES Permit Number MDR001216, to discharge stormwater associated with industrial activity from the Facility, alone or in combination with authorized non-stormwater discharges listed in Part I.E. of the General Permit, beginning January 1, 2014.
33. At all times relevant to this CAFO, the Facility discharged stormwater and/or authorized non-stormwater through outfalls identified in its Permit into the Gwynns Falls tributary to the Patapsco River, which is a “water of the United States” within the meaning of Section 502(7) of the Act, 33 U.S.C. § 1362(7).
34. On November 16, 2021, an EPA compliance inspection team conducted an inspection of the Facility (“Inspection”) pursuant to Section 308 of the Act, 33 U.S.C. § 1318.
35. EPA sent an Inspection report dated January 10, 2022, to Respondent on January 11, 2022. Respondent sent EPA subsequent documentation via email on February 10, 2022, and March 9, 2022.
36. Based on the Inspection and review of Respondent’s responses as mentioned in Paragraph 35, EPA has identified the following violations of the General Permit, and Section 301 of the CWA, 33 U.S.C. § 1311, described in the Paragraphs below.

**Count I**  
**Failure to Implement Corrective Actions**

37. The information and allegations in the preceding paragraphs of this CAFO are incorporated herein by reference.

38. Part IV.B.2 of the General Permit requires that a corrective action review is needed if “the average of 4 quarterly sampling results exceeds an applicable benchmark. If less than 4 benchmark samples have been taken, but the results are such that an exceedance [sic] of the 4 quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than 4 times the benchmark level) this is considered a benchmark exceedance [sic], triggering this review;” the Permittee must “review the selection, design, installation, and implementation of control measures to determine if modifications are necessary to meet the effluent limits in this permit.”
39. Part IV.C of the General Permit requires Respondent to, “document your discovery of any of the conditions listed in parts IV.A and IV.B within 24 hours of making such discovery. Subsequently, within 14 days of such discovery, you must document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination.”
40. The Facility experienced benchmark exceedances from Outfall No. 001 for multiple parameters 42 times between January 1, 2018 and September 30, 2021. The facility exceeded the four-quarter average 4 times from Outfall No. 001 during Q4 2020- Q3 2021.
41. At the time of the Inspection, the inspectors could not identify any documented corrective action for the Facility taken within 14 days of the benchmark exceedances.
42. In failing to comply with Part IV.B.2 and IV.C of the General Permit and Sections 301 and 402 of the Act, 33 U.S.C. §§ 1311 and 1342, Respondent is subject to the assessment of penalties under Section 309(g) of the CWA, 33 U.S.C. § 1319(g).

**Count II**  
**Failure to Ensure Good Housekeeping**

43. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
44. Part III.B.1.b.ii of the General Permit requires the Respondent to “clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers. A good practice for ensuring housekeeping activities are performed at regular intervals would be keeping a schedule for routine grounds maintenance and cleanup.”
45. Sector N of the General Permit (Scrap Recycling = Facilities) Part N.3.1.2 Scrap and Waste Material Stockpiles and Storage (Outdoor), requires Respondent to “Minimize contact of stormwater runoff with stockpiled materials, processed materials, and nonrecyclable wastes.” Control measures include “(a) permanent or semi-permanent covers; (b) sediment traps, vegetated swales and strips, catch basin filters, and sand filters to facilitate settling or filtering of pollutants; (c) dikes, berms, containment trenches, culverts, and surface grading to divert runoff from storage areas; (d) silt fencing/bio-logs; and (e) oil and water separators, sumps, and dry absorbents for areas where potential sources of residual fluids are stockpiled (e.g., automobile engine storage areas).”
46. EPA inspectors observed stockpiled rusted metal materials and steel materials stored uncovered and exposed to stormwater in violation of the above-referenced permit requirement.
47. In addition, EPA inspectors identified staining near the maintenance and vehicle wash areas, which drain to the Facility stormwater pond.
48. The inspectors also identified sheen on runoff from the dust control water truck spraying access roads. The sheen was observed flowing south towards the stormwater pond from multiple locations.
49. At the time of the Inspection, Respondent failed to perform good housekeeping measures in order to minimize pollutant discharges as required by the General Permit.

50. At the time of the Inspection, Respondent violated Part III.B.1.b.ii and Part N.3.1.2 of the General Permit and Sections 301 and 402 of the Act, 33 U.S.C. §§ 1311 and 1342, by failing to perform good housekeeping measures to minimize pollutant discharges.
51. In failing to comply with Part III.B.1.b.ii and Part N.3.1.2 of the General Permit and Sections 301 and 402 of the Act, 33 U.S.C. §§ 1311 and 1342, Respondent is subject to the assessment of penalties under Section 309(g) of the CWA, 33 U.S.C. § 1319(g).

### CIVIL PENALTY

52. In settlement of EPA's claims for civil penalties for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty in the amount of THIRTY-TWO THOUSAND AND FIVE HUNDRED dollars (\$32,500.00), which Respondent shall be liable to pay in accordance with the terms set forth below.
53. The civil penalty is based upon EPA's consideration of a number of factors, including the penalty criteria ("statutory factors") set forth in Section 309(g) of the CWA, 33 U.S.C. § 1319(g), including, the following: the nature, circumstances, extent and gravity of the violation(s), and the violator's ability to pay, any prior history of such violations, the degree of culpability, economic benefit or savings resulting from the violation, and such other matters as justice may require. These factors were applied to the particular facts and circumstances of this case and adjusted in accordance with the appropriate *Adjustment of Civil Monetary Penalties for Inflation*, pursuant to 40 C.F.R. Part 19, and the applicable EPA memoranda addressing EPA's civil penalty policies to account for inflation.
54. Payment of the civil penalty amount, and any associated interest, administrative fees, and late payment penalties owed, shall be made by either cashier's check, certified check, or electronic wire transfer, in the following manner:
- a. All payments by Respondent shall include reference to Respondent's name and address, and the Docket Number of this action, *i.e.*, *CWA-03-2023-0055*;
  - b. All checks shall be made payable to the "United States Treasury";
  - c. All payments made by check and sent by regular mail shall be addressed and mailed to:  
  
U.S. Environmental Protection Agency  
Cincinnati Finance Center  
P.O. Box 979077  
St. Louis, MO 63197-9000
  - d. For additional information concerning other acceptable methods of payment of the civil penalty amount see:  
  
<https://www.epa.gov/financial/makepayment>
  - e. A copy of Respondent's check or other documentation of payment of the penalty using the method selected by Respondent for payment shall be sent simultaneously **by email** to:

Douglas Frankenthaler  
Assistant Regional Counsel  
frankenthaler.douglas@epa.gov

**and**

U.S. EPA Region III Regional Hearing Clerk  
R3\_Hearing\_Clerk@epa.gov.

55. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, EPA is entitled to assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim, as more fully described below. Accordingly, Respondent's failure to make timely payment of the penalty as specified herein shall result in the assessment of late payment charges including interest, penalties and/or administrative costs of handling delinquent debts.
56. Payment of the civil penalty is due and payable immediately upon the effective date of this 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 as of the effective date of this Consent Agreement and Final Order by Respondent in accordance with 40 C.F.R. § 13.9(a).
57. INTEREST: Interest on the civil penalty assessed in this Consent Agreement and Final Order will begin to accrue on the effective date of this Consent Agreement and Final Order. However, EPA will not seek to recover interest on any amount of the civil penalties that is paid within thirty (30) calendar days after the effective date of this Consent Agreement and Final Order. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R § 13.11(a).
58. ADMINISTRATIVE COSTS: The costs of the EPA's administrative handling of overdue debts will be charged and assessed monthly throughout the period a debt is overdue. 40 C.F.R. § 13.11(b). If payment is not received within 30 calendar days of the effective date of this Consent Agreement, EPA will also assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid.
59. LATE PAYMENT PENALTY: A late payment penalty of six percent per year will be assessed monthly on any portion of the civil penalty that remains delinquent more than ninety (90) calendar days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d).
60. Respondent agrees not to deduct for federal tax purposes the civil penalty assessed in this Consent Agreement and Final Order.
61. **The Parties consent to service of the Final Order by e-mail at the following valid e-mail addresses: Frankenthaler.douglas@epa.gov (for Complainant), and sgould@mcneeslaw.com (for Respondent).**

#### **GENERAL SETTLEMENT CONDITIONS**

62. 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.
63. Respondent certifies that any information or representation it has supplied or made to EPA concerning this matter was, at the time of submission true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. EPA shall have the right to institute further actions to recover appropriate relief if EPA obtains evidence that any information provided and/or representations made by Respondent to the EPA regarding matters relevant to this Consent Agreement and Final Order are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that EPA may have, civil or criminal, under law or equity in such event. Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

#### **CERTIFICATION OF COMPLIANCE**

64. Respondent certifies to EPA, upon personal investigation and to the best of its knowledge and belief, that the Facility is currently in compliance with the General Permit.

## **OTHER APPLICABLE LAWS**

65. Nothing in this Consent Agreement and Final Order shall relieve Respondent of its obligation to comply with all applicable federal, state, and local laws and regulations, nor shall it restrict EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on the validity of any federal, state, or local permit. This Consent Agreement and Final Order does not constitute a waiver, suspension, or modification of the requirements of the CWA, 33 U.S.C. § 1251 *et seq.*, or any regulations promulgated thereunder.

## **RESERVATION OF RIGHTS**

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

## **EXECUTION / PARTIES BOUND**

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

## **EFFECTIVE DATE**

68. Pursuant to 40 C.F.R. § 22.45(b), this Consent Agreement and Final Order shall be issued only after a 40-day public notice and comment period is concluded. This Consent Agreement and Final Order will become final and effective thirty (30) days after having been signed by the Regional Administrator or his delegate, the Regional Judicial Officer, and filed with the Regional Hearing Clerk.

## **ENTIRE AGREEMENT**

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

For Respondent: UNITED IRON & METAL, LLC

Date: 21 March 2023

By: 

Aaron W. Hill  
Managing Member  
United Iron & Metal, LLC

For the Complainant:

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

By: \_\_\_\_\_  
[Digital Signature and Date]

Karen Melvin, Director  
Enforcement & Compliance Assurance Division  
U.S. EPA – Region III  
Complainant

Attorney for Complainant:

By: \_\_\_\_\_  
[Digital Signature and Date]

Douglas Frankenthaler  
Assistant Regional Counsel  
U.S. EPA – Region III

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
Philadelphia, Pennsylvania 19103**

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<b>Baltimore, MD 21223</b>	:	
	:	
<b>Facility.</b>	:	

**FINAL ORDER**

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

Based upon the representations of the parties in the attached Consent Agreement, the penalty agreed to therein is based upon consideration of, *inter alia*, EPA’s *Interim Clean Water Act Settlement Penalty Policy*, March 1, 1995, and the statutory factors set forth in Section 309(g)(3) of the Clean Water Act, 33 U.S.C. § 1319(g)(3).

**NOW, THEREFORE, PURSUANT TO** Section 309(a) of the Clean Water Act, 33 U.S.C. § 1319(a), 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-TWO THOUSAND AND FIVE HUNDRED DOLLARS (\$32,500.00)***, in accordance with the payment provisions set forth in the Consent Agreement and in 40 C.F.R. § 22.31(c), and comply with the terms and conditions of the Consent Agreement.

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

The Effective Date of the attached Consent Agreement and this Final Order is thirty (30) days after the date on which this Final Order is signed by the Regional Administrator or his delegate, the Regional Judicial Officer, and filed with the Regional Hearing Clerk.

By :

*[Digital Signature and Date]*

Joseph J. Lisa

Regional Judicial and Presiding Officer

U.S. EPA – Region III



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

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**United Iron & Metal, LLC** : **U.S. EPA Docket No. CWA-03-2023-0055**  
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 : **Water Act, 33 U.S.C. § 1319(g)**  
**Respondent.** :  
 :  
**Former United Iron & Metal, West** :  
**909 Millington Ave.** :  
**Baltimore, MD 21223** :  
 :  
**Facility.** :

**CERTIFICATE OF SERVICE**

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

Copies served via email to:

Scott Gould  
McNees Wallace & Nurick LLC  
100 Pine St P.O. Box 1166  
Harrisburg, PA  
sgould@mcneeslaw.com  
Aaron Hill  
United Iron & Metal  
909 Millington Avenue  
Baltimore, MD 21223  
Aaron.Hill@simsmm.com

Copies served via email to:

Douglas Frankenthaler  
Assistant Regional Counsel  
U.S. EPA, Region III  
frankenthaler.douglas@epa.gov

Angela Weisel  
Life Scientist  
U.S. EPA, Region III  
weisel.angela@epa.gov

By: \_\_\_\_\_  
[Digital Signature and Date]  
Regional Hearing Clerk  
U.S. EPA – Region III