

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 1**



**IN THE MATTER OF:** )  
 )  
 )  
Northland Environmental, LLC )  
275 Allens Avenue )  
Providence, RI 02905 )  
EPA ID. No. RID040098352 )  
 )  
Proceeding under Section 3008(a) of the Resource )  
Conservation and Recovery Act, 42 U.S.C § 6928(a) )  
\_\_\_\_\_ )

Docket No.  
**RCRA-01-2026-0041**

**EXPEDITED SETTLEMENT  
AGREEMENT**

**EXPEDITED SETTLEMENT AGREEMENT**

1. The U.S. Environmental Protection Agency (“EPA”) is authorized to enter into this Expedited Settlement Agreement (“Agreement”) pursuant to Section 3008 of the Resource Conservation and Recovery Act (“RCRA”) and 40 C.F.R. § 22.13(b).
2. EPA has provided the State of Rhode Island with notice of the referenced violations of Subtitle C of RCRA, as required by Section 3008(a)(2).
3. Northland Environmental, LLC (“Respondent”) is the owner and/or operator of a treatment, storage and transfer facility located at 252 and 275 Allens Avenue, Providence, Rhode Island (“Facility”). The state of Rhode Island, which is authorized by EPA to implement its hazardous waste regulations codified at Rhode Island Hazardous Waste Regulations 250-RICR-140-10-1, issued a hazardous waste treatment, storage and transfer permit to Respondent on January 8, 2025, with an expiration date of December 1, 2027 (“Permit”).
4. Based on the EPA’s survey of Respondent’s reporting in the EPA e-Manifest system, EPA alleges that Respondent violated RCRA and the following Permit condition:

Condition #29 of the Permit incorporates by reference 40 C.F.R. § 264.71(l), which requires that after a facility has certified that a hazardous waste manifest is complete by signing it at the time of submission to the EPA e-Manifest system, any post-receipt data corrections requested by EPA or the State for portions of the manifest that a designated facility is required to complete must be made by the facility within 30 days of the request.

Between January 17, 2025, and December 5, 2025, Respondent received 16 correction requests from the State of Maine regarding hazardous waste manifests Respondent had certified and submitted to the EPA e-Manifest system (see Attachment A). Respondent did not make the requested 16 corrections within 30 days of the requests.

5. EPA and Respondent agree that settlement of this matter for a civil penalty of **twenty thousand dollars (\$20,000)** is in the public interest.
6. In signing this Agreement, Respondent: (1) admits that Respondent is subject to RCRA and its implementing regulations; (2) admits that EPA has jurisdiction over Respondent and Respondent's conduct as alleged herein, (3) neither admits nor denies the factual allegations contained herein; (4) consents to the assessment of this penalty; (5) waives the opportunity for a hearing to contest any issue of fact or law set forth herein; (6) waives its right to appeal the Final Order accompanying this Agreement pursuant to Section 3008(b) of RCRA; and (7) consents to electronic service of the filed Agreement.
7. By signing this 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 this Agreement.
8. By its signature below, Respondent certifies, subject to civil and criminal penalties for making a false submission to the United States Government, that the alleged violations have been corrected and Respondent has submitted true and accurate documentation of such correction.
9. The undersigned representative of Respondent certifies that he or she is fully authorized to enter the terms and conditions of this Expedited Settlement Agreement and Final Order and to execute and legally bind Respondent to it. Payment of the civil penalty shall constitute full settlement of the civil claims alleged herein.
10. EPA reserves all of its rights to take an enforcement action for any other past, present, or future violations by Respondent of RCRA, any other federal statute or regulation, or this Agreement.
11. Each party shall bear its own costs and fees, if any.
12. This Agreement is binding on the parties signing below, and in accordance with 40 C.F.R. § 22.31(b), is effective upon filing.
13. Within thirty (30) calendar days of the effective date of this Agreement, Respondent must pay the civil penalty of **\$20,000** using any method provided on the following website: <https://www.epa.gov/financial/makepayment>. Such payment shall identify Respondent by name and include the docket number assigned to this Agreement. As of September 30, 2025, checks are no longer accepted by the United States government for penalty payments.

14. Within 24 hours of payment, Respondent shall email proof of payment (e.g., a copy of the check or a statement of affirmation regarding electronic funds transfer), including Respondent's name, complete address, and docket number to the following:

Cheryl Wilkinson, Life Scientist  
U.S. Environmental Protection Agency, Region 1  
Via electronic mail to:  
Wilkinson.Cheryl@epa.gov

Andrea Simpson  
Senior Enforcement Counsel  
U.S. Environmental Protection Agency, Region 1  
Via electronic mail to:  
simpson.andrea@epa.gov

Wanda Santiago, Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 1  
Via electronic mail to:  
r1\_hearing\_clerk\_filings@epa.gov

U.S. Environmental Protection Agency  
Cincinnati Finance Center  
Via electronic mail to:  
CINWD\_AcctsReceivable@epa.gov

15. No portion of the civil penalty or interest paid by Respondent pursuant to the requirements of this Expedited Settlement Agreement and Final Order shall be claimed by Respondent as a deduction for federal, state or local income tax purposes.
16. Complainant and Respondent, by entering into this Agreement, each give their respective consent to accept digital signatures hereupon. Respondent further consents to accept electronic service of the fully executed Agreement, by electronic mail, to the following address: [jgustavson@cleanearthinc.com](mailto:jgustavson@cleanearthinc.com). Respondent understands that this e-mail address may be made public when the Agreement and Certificate of Service are filed and uploaded to a searchable database. Complainant has provided Respondent with a copy of the EPA Region 1 Regional Judicial Officer's Authorization of EPA Region 1 Part 22 Electronic Filing System for Electronic Filing and Service of Documents Standing Order, dated June 19, 2020. Electronic signatures shall comply with, and be maintained in accordance with, that Order.

IT IS SO AGREED,

For Respondent:



Date: 5/28/26

Melanie Frohriep  
Vice President, Regulatory Affairs and  
Environmental Compliance

For the U.S. EPA, Region 1:

Date: \_\_\_\_\_

\_\_\_\_\_  
James Chow, Director  
Enforcement and Compliance Assurance Division  
EPA, Region 1

**FINAL ORDER**

Pursuant to 40 C.F.R. § 22.18(b) and (c) of the Consolidated Rules of Practice found at 40 C.F.R. Part 22, the Expedited Settlement Agreement resolving this matter is incorporated by reference into this Final Order and is hereby ratified. The Respondent, Northland Environmental, LLC, is ORDERED to comply with all terms of the Expedited Settlement Agreement, which shall become effective on the date it is filed with the EPA Region 1 Regional Hearing Clerk.

IT IS SO ORDERED:

Date: \_\_\_\_\_

\_\_\_\_\_  
Michael J. Knapp  
Regional Judicial Officer  
EPA, Region 1