

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103



In the Matter of: :
 :
 :
Shifflett's Used Auto Parts : U.S. EPA Docket No. CWA-03-2024-0050DN
724 Gorsuch Road :
Westminster, MD 21157 : **Administrative Order on Consent Pursuant to**
 : **Section 309(a)**
Respondent. : **of the Clean Water Act**
 :
 :
724 Gorsuch Road :
Westminster, MD 21157 :
 :
Facility. :
 :
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ADMINISTRATIVE ORDER ON CONSENT

I. PRELIMINARY STATEMENT

1. The United States Environmental Protection Agency ("EPA") has made the following findings of fact and issues this Administrative Order on Consent ("AOC") pursuant to the authority vested in the Administrator of EPA under Section 309(a) of the Clean Water Act ("CWA" or "Act"), 33 U.S.C. § 1319(a). This authority has been delegated by the Administrator to the Regional Administrator of EPA Region 3, and further delegated to the Director, Enforcement and Compliance Assurance Division, Region 3.
2. Section 309(a) of the Act, 33 U.S.C. § 1319(a), provides, *inter alia*, that whenever on the basis of any information available to him the Administrator finds that any person is in violation of any permit condition or limitation implementing certain sections of the Act, in a permit issued under Section 402 of the Act, 33 U.S.C. § 1342, she shall issue an order requiring such person to comply with such section or requirement.

II. JURISDICTION

3. The EPA has jurisdiction over the above-captioned matter, as described in Paragraph 1, above.

III. **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

4. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this AOC.
5. Except as provided in Paragraph 4, above, Respondent neither admits nor denies the factual allegations set forth in this AOC.
6. Respondent agrees not to contest the jurisdiction of EPA with respect to the execution and issuance of this AOC.
7. Section 301(a) of the Act, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant from a point source into waters of the United States except in compliance with, among other things, a permit issued pursuant to the National Pollutant Discharge Elimination System (“NPDES”) program under Section 402 of the Act, 33 U.S.C. § 1342.
8. “Discharge of a pollutant” includes “any addition of any pollutant or combination of pollutants to waters of the United States from any point source.” 40 C.F.R. § 122.2.
9. Section 402(p) of the CWA, 33 U.S.C. § 1342(p), and 40 C.F.R. §§ 122.2 and 122.26 provide that storm water discharges are “point sources” subject to NPDES permitting requirements under section 402(a) of the CWA, 33 U.S.C. § 1342(a).
10. “Stormwater” is defined as “storm water runoff, snow melt runoff and surface water runoff and drainage.” 40 C.F.R. § 122.26(b)(13).
11. “Stormwater discharge associated with industrial activity” is defined as “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” 40 C.F.R. § 122.26(b)(14). The term includes storm water discharges from facilities classified as Standard Industrial Classification (“SIC”) 5015. 40 C.F.R. § 122.26(b)(14)(vi).
12. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the 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.
13. 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.
14. 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.

15. Pursuant to the authority of the CWA, MDE issued the NPDES General Permit for Discharges of Stormwater Associated with Industrial Activities (Registration No. MDR003328) (“Permit”), which authorizes certain discharges from the Facility into the North Branch Patapsco River. The Facility is classified under Section M of the Permit, Automobile Salvage Yard, Standard Industrial Classification Code (SIC) 5015 – Motor Vehicle Parts, Used. The Permit is also known as 12-SWA and is available at <https://mde.maryland.gov/programs/permits/WaterManagementPermits/Documents/GDP%20Stormwater/Modification%20A%20%282018%29/12SW-Permit-w-ModA.pdf>.
16. The Permit became effective January 1, 2014, and expired December 31, 2018. MDE administratively extended the Permit to July 31, 2023, and then reissued the permit, with an expiration date of January 31, 2028.
17. The Permit authorizes the discharge of stormwater associated with industrial activity in accordance with the provisions of the Permit.
18. Respondent applied for and was granted coverage under the Permit to discharge stormwater associated with industrial activity from its facility, beginning January 1, 2014, and extended through January 31, 2028
19. Shifflett’s Used Auto Parts is, and at all times relevant to this AOC was, the permittee. Shifflett’s Used Auto Parts is the owner and the operator of an automobile salvage yard located at 724 Gorsuch Road, Westminster, MD, 21157 (the “Facility”).
20. Shifflett’s Used Auto Parts, LLC is a 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), and is subject to the assessment of civil penalties for the violations alleged herein.
21. Respondent is, and at all times relevant to this AOC was, engaging in “industrial activity” at the Facility, within the meaning of 40 C.F.R. § 122.26(a)(1)(ii).
22. The Facility discharges, and at all times relevant to this AOC discharged, stormwater and/or authorized non-stormwater through outfalls identified in its Permit into the North Branch 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).
23. On February 15, 2022, an EPA inspector and a representative from the Maryland Department of the Environment (“MDE”) conducted a compliance evaluation inspection (“CEI”) at the Facility, identifying the below alleged violations of the CWA.

Count 1

Failure to Maintain an Adequate Stormwater Pollution Prevention Plan (“SWPPP”) Map

24. The information and allegations in the preceding Paragraphs of this AOC are incorporated herein by reference.

25. Part III.C.2.c of the Permit requires the following fourteen elements to be included in the required Stormwater Pollution Prevention Plan (“SWPPP”) site map:
- a. size of the property in acres;
 - b. the location and extent of significant structures and impervious surfaces
 - c. the location and extent for planned restoration of impervious surfaces, or nutrient reduction measures;
 - d. directions of stormwater flow (use arrows);
 - e. locations of all existing structural control measures or best management practices (“BMPs”);
 - f. locations of all receiving waters in the immediate vicinity of your facility, indicating if any of the waters are impaired and if so, whether the waters have total maximum daily loads (“TMDLs”) established for them;
 - g. locations of all stormwater conveyances including ditches, pipes, and swales;
 - h. locations of potential pollutant sources identified under Part III.C.3;
 - i. locations where significant spills or leaks identified under Part III.C.3 have occurred;
 - j. locations of all stormwater monitoring points;
 - k. locations of all stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc.) indicating if you are treating one or more outfalls as substantially identical, and an approximate outline of areas draining to each outfall;
 - l. municipal separate storm sewer systems, where your stormwater discharges to them;
 - m. locations and descriptions of all non-stormwater discharges identified under Part I.E.3; and
 - n. locations of the following activities where such activities are exposed to precipitation:
 - i. fueling stations;
 - ii. vehicle and equipment maintenance and/or cleaning areas;
 - iii. loading/unloading areas;
 - iv. locations used for treatment, storage, or disposal of wastes;

- v. liquid storage tanks;
 - vi. processing and storage areas
26. At the time of CEI, EPA observed the following elements missing from the SWPPP site map, in violation of Part III.C.2.c of the Permit:
- a. Size of the property in acres;
 - b. Locations of all existing structural control measures or BMPs;
 - c. Locations of all potential pollutant sources identified under Part III.C.3;
 - d. Locations where significant spills or leaks identified under Part III.C.3 have occurred;
 - e. Locations of all stormwater monitoring points;
 - f. Locations and descriptions of all non-stormwater discharges identified under Part I.E.3;
 - g. Locations of the following activities where such activities are exposed to precipitation:
 - i. fueling stations;
 - ii. vehicle and equipment maintenance and/or cleaning areas;
 - iii. loading/unloading areas;
 - iv. locations used for the treatment, storage, or disposal of wastes;
 - v. liquid storage tanks;
 - vi. processing and storage areas;
 - vii. immediate access roads and rail lines used or traveled by carriers of raw materials,
 - viii. manufactured products, waste material, or by-products used or created by the Facility;
 - ix. transfer areas for substances in bulk; and,
27. At the time of the CEI, Respondent's failure to have a SWPPP site map as required by its Permit constituted a violation of the Permit, Part III.C.2.c issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342, and Section 301 of the Act, 33 U.S.C. § 1311.

Count 2

Failure to Document Routine Facility Inspections

28. The information and allegations in the preceding Paragraphs of this AOC are incorporated herein by reference.
29. Part V.A.1 of the Permit requires, "At least once per quarter, you must conduct a site assessment that will review the effectiveness of the SWPPP. At least once each calendar year, the routine facility inspection must be conducted during a period when a stormwater discharge is happening."
30. At the time of the CEI, EPA observed the Facility had no documents identifying any quarterly inspections during stormwater discharge events from 2021 through April 2022. Respondent's failure to document routine facility inspections during periods of stormwater discharge violated Part V.A.1 of the Permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342, and Section 301 of the Act, 33 U.S.C. §§ 1311.

Count 3

Failure to Ensure Good Housekeeping

31. The information and allegations in the preceding Paragraphs of this AOC are incorporated herein by reference.
32. Part III.B.1.b.ii of the Permit requires the Facility to "keep 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 is performed at regular intervals would be keeping a schedule for routine grounds maintenance and cleanup."
33. Part III.B.1.b.iv of the Permit requires the Facility to "minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur." At a minimum, this requires "[p]reventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage handling." Further, Part III.B.1.b.v of the Permit requires the Facility to "stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants."
34. EPA inspectors observed a 250-gallon, single-walled above-ground storage tank (AST) containing diesel in the yard without secondary containment. Petroleum stains were observed on the ground in the immediate vicinity of the AST.
35. EPA inspectors also observed petroleum stains and spill absorbent material on the ground in various locations at the Facility.
36. In addition, EPA inspectors identified an unlabeled drum stored at the Facility containing unknown liquid under a tarp with no lid. The drum was not in secondary

containment. The area near the unlabeled drum smelled of petroleum products at the time of the CEI.

37. EPA inspectors also identified spilled antifreeze and transmission fluid around the totes outside of the Main Building's north wall. Spill absorbent material was observed surrounding the totes.
38. EPA inspectors also observed a forklift stored north of the Main Building leaking hydraulic fluid during the CEI. No drip pans or absorbents were observed under or around the vehicle.
39. At the time of the CEI, Respondent's actions were not in compliance with Parts III.B.1.b.ii, iv and v of the Permit issued under Section 402 of the Act, 33 U.S.C. § 1342, and Section 301 of the Act, 33 U.S.C. § 1311.

Count 4

Failure to Maintain Proper Operation and Maintenance

40. The information and allegations in the preceding Paragraphs of this AOC are incorporated herein by reference.
41. Appendix D Sector M.M.2.1 of the Permit requires the operator to "Drain vehicles intended to be dismantled of all fluids upon arrival at the site (or as soon thereafter as feasible) or employ some other equivalent means to prevent spills and leaks. You must establish clean-up mechanisms and procedures for all fluids (e.g., anti-freeze, used, oil, used fuel, etc.) for all locations that vehicles will be drained of fluids or any equipment receives fluids, and ensure all batteries from vehicles are protected from exposure to stormwater upon arrival at the site."
42. Appendix D Sector M.M.3.2 of the Permit requires the operator to "Assess the potential for the following to contribute pollutants to stormwater discharges: vehicle storage areas, dismantling areas, parts storage areas (e.g., engine blocks, tires, hub caps, batteries, hoods, mufflers), and fueling stations. Facilities that crush vehicles produce a residual fluid that contains petroleum, metal, and glass fines. These byproducts will need to be identified as potential pollutants and measures shall be identified to ensure they do not commingle with stormwater. Fluids collected must be handled appropriately."
43. At the time of the CEI, EPA observed multiple uncovered or partially covered engines throughout the yard.
44. EPA inspectors also observed an uncovered dumpster onsite that contained engines and a battery.
45. In addition, EPA inspectors identified multiple vehicles on the lot where batteries and/or fluids had not been fully removed.

46. At the time of the CEI, Respondent failed to have mechanisms and procedures ensuring batteries and vehicle fluids were not exposed to stormwater in violation of Appendix D Sector M.M.2.1 and M.M.3.2 of the Permit issued under Section 402 of the Act, 33 U.S.C. § 1342 and Section 301 of the Act, 33 U.S.C. § 1311.

Count 5
Failure to Define All Outfalls

47. The information and allegations in the preceding Paragraphs of this AOC are incorporated herein by reference.
48. Part V.C.1 of the Permit requires the Facility to “conduct monitoring as required by this permit at each outfall authorized by this permit, except when an outfall is exempt from monitoring as a substantially identical outfall. If your facility has two or more outfalls that you believe discharge substantially identical effluents, based on the similarities of the general industrial activities and control measures, exposed materials that may significantly contribute pollutants to stormwater, and runoff coefficients of their drainage areas, you may monitor the effluent of just one of the outfalls and report that the results also apply to the substantially identical outfall(s). As required in Part III.C.5, your SWPPP must identify each outfall authorized by this permit and describe the rationale for any substantially identical outfall determinations.”
49. Appendix E of the Permit defines an outfall as “Locations where collected and concentrated stormwater flows are discharged from the facility, including pipes, ditches, swales, and other structures that transport stormwater.”
50. EPA inspectors observed an outfall location near the southwest perimeter of the Facility that was not included in the SWPPP map. Subsequently, the location was added and identified as Outfall 002.
51. At the time of CEI, Respondent failed to identify Outfall 002 in violation of Part III.C.5 of the Permit issued under Section 402 of the Act, 33 U.S.C. § 1342 and Section 301 of the Act, 33 U.S.C. § 1311.

IV. Order for Compliance

52. Therefore, the Respondent is hereby ORDERED, pursuant to Section 309(a) of the Clean Water Act, 33 U.S.C. § 1319(a), to do the following:
53. Within 12 months of the Effective Date of this AOC, Respondent shall construct a covered vehicle disassembling area with a solid concrete pad, consistent with the plans attached and incorporated herein as Appendix A. Respondent shall submit a construction completion certification upon completion and ensure use of the new vehicle disassembling area going forward.
54. For a 12-month period after the Effective Date of this AOC, Respondent shall electronically submit to EPA the following on a quarterly basis.

- Completed inspection forms Respondent uses to comply with Part V.A.1 of the Permit.
- Progress reports that include, at a minimum, any corrective actions taken pursuant to the and any updates to the SWPPP with dates of completion or updates, respectively.
- Respondent shall submit these documents in accordance with Section V, below.
- Respondent shall submit these documents beginning on the 1st day of each quarter, beginning on the first quarter after the Effective Date and for the three subsequent quarters.

55. Respondent shall take all actions necessary to comply with the Permit (or subsequent permits or permit modifications, including permit compliance schedules, issued by MDE) at the Facility. In addition, within 60 days of the Effective Date of this AOC, Respondent shall provide to EPA for review a written Standing Operating Procedure (“SOP”) and BMP plans for vehicle dismantling at the Facility. The SOP should focus on environmental compliance with the Permit. The SOP and BMP plan shall be fully implemented no later than 1 year after the Effective Date of this AOC.

V. PROCEDURES FOR SUBMISSIONS

56. All documents required to be submitted by this AOC and any Request for Termination shall be accompanied by a certification signed by a responsible officer, as defined in 40 CFR § 122.22(d), that reads as follows:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Title: _____

Date: _____

57. Any notice, submission, certification, data presentation, or other document submitted by Respondent to EPA pursuant to this AOC shall be sent via-email transmission to the attention of:

Email: Weisel.angela@epa.gov

Angela Weisel
NPDES Section (3ED32)
U.S. EPA, Region 3

and

Email: Frankenthaler.Douglas@epa.gov

Douglas Frankenthaler (3RC40)
Asst. Regional Counsel
U.S. EPA, Region 3

Notice by EPA under this AOC shall be sent via-email transmission to the attention of:

Email: [REDACTED]

Jeff Shifflett
Shifflett's Used Auto Parts

with a copy to:

Email: thomas.prevas@saul.com

Thomas K. Prevas, Esquire
Saul Ewing, LLP

All information submitted shall be submitted in a widely recognized electronic format.

58. Respondent may assert a business confidentiality claim covering part or all the information which this AOC requires it to submit to EPA, but only to the extent and only in the manner described in Part 2 Subpart B of Title 40 of the C.F.R. EPA will disclose information submitted under a confidentiality claim only as provided in Part 2 Subpart B of Title 40 of the C.F.R. If, at the time any information is submitted to EPA, the Respondent submitting such information does not assert a confidentiality claim, EPA may make the submitted information available to the public without further notice to Respondent.

**VI. CERTIFICATION OF COMPLIANCE AND
REQUEST FOR TERMINATION OF AOC**

59. Upon completion of all items required in Section IV of this AOC, Respondent shall submit to EPA a Certification of Compliance and Request for Termination of this AOC. Such certification and request shall include:
- a. A certification that Respondent has maintained compliance with this AOC for the term of this AOC and
 - b. All necessary documentation, including photo documentation as appropriate, to support a finding that Respondent has complied with Section IV of this AOC.
 - c. If, following review of any Certification of Compliance and Request for Termination of this AOC, EPA agrees that Respondent has adequately complied with all requirements of this AOC, then EPA may, in its unreviewable discretion, provide written notification of termination of this AOC.

VII. GENERAL PROVISIONS

60. Issuance of this AOC is intended to address the violations described herein. 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. Further, EPA reserves any rights and remedies available to it under the CWA, 33 U.S.C. §§ 1251-1389, the regulations promulgated thereunder, and any other federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this AOC, following its effective date (as defined below).
61. This AOC does not constitute a waiver or modification of the terms or conditions of the Respondent's Permit. Compliance with the terms and conditions of this AOC does not relieve Respondent of its obligations to comply with any applicable federal, state, or local law, regulation or permit.
62. Respondent waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this AOC, including any right of judicial review pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.
63. EPA reserves all existing inspection authority otherwise available to EPA pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, or pursuant to any other statute or law.
64. EPA reserves the right to commence an 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. EPA reserves all existing rights and remedies available to it under the CWA, 33 U.S.C. § 1311, *et seq.*, the regulations promulgated thereunder, and any other

federal laws or regulations for which EPA has jurisdiction, including enforcement of this AOC.

65. The undersigned representative of Respondent certifies that he or she is fully authorized by the party represented to enter into the terms and conditions of this AOC and to execute and legally bind the party.
66. The provisions of this AOC shall apply to and be binding upon the Respondent and its officers, directors, employees, contractors, agents, trustees, successors and assigns of Respondent.
67. Respondent shall bear its own costs and attorney's fees in connection with this proceeding and associated with the implementation or enforcement of this AOC, including any costs related to resolution of any dispute arising regarding this AOC.
68. Respondent certifies that to its knowledge, 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 AOC are in any material respect, false or 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.
69. Respondent may assert a business confidentiality claim covering part or all of the information which this AOC requires it to submit to EPA, but only to the extent and only in the manner described in Part 2 Subpart B of Title 40 of the C.F.R. The EPA will disclose information submitted under a confidentiality claim only as provided in Part 2 Subpart B of Title 40 of the C.F.R. If Respondent does not assert a confidentiality claim, EPA may make the submitted information available to the public without further notice to Respondent.
70. For purposes of the identification requirement in Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. § 162(f)(2)(A)(ii), and 26 C.F.R. § 162-21(b)(2), performance of the work required by this AOC; is restitution, remediation, or required to come into compliance with the law.
71. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, 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 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.” 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). Failure to comply with providing 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. In order to provide EPA with sufficient information to enable it to fulfill these obligations, EPA herein requires, and 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 Center at henderson.jessica@epa.gov, within 30 days after the Effective Date of this Order, and 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 has applied for a TIN and that TIN has not been issued to Respondent within 30 days after the Effective Date, then Respondent, using the same email address identified in the preceding sub-paragraph, shall further:
 - i. notify EPA’s Cincinnati Finance Center of this fact, via email, within 30 days after the 30 days after the Effective Date; and
 - ii. provide EPA’s Cincinnati Finance Center with Respondent’s TIN, via email, within five (5) days of Respondent’s issuance and receipt of the TIN.

VIII. EFFECTIVE DATE

72. This AOC will become effective upon the Respondent’s receipt of a fully executed copy of this AOC (“Effective Date”).

FOR RESPONDENT SHIFFLETT'S USED AUTO PARTS

Date: 2/6/24

By: 
 Jeffrey Shifflett
President
Shifflett's Used Auto Parts

SO ORDERED:

FOR U.S. ENVIRONMENTAL PROTECTION AGENCY

Date: _____

By: **KAREN
MELVIN**  Digitally signed by KAREN
MELVIN
Date: 2024.04.24 10:35:18
-04'00'

Karen Melvin, Director
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 3

CERTIFICATE OF SERVICE

I certify that the enclosed Administrative Order on Consent was delivered to the following persons:

Delivery by UPS:

Jeffrey Shifflett
President
Shifflett's Used Auto Parts
724 Gorsuch Road
Westminster, MD 21157

Delivery by electronic mail:

████████████████████

with a copy to

Thomas.prevas@saul.com

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 3
Philadelphia, PA 19103

Date: 4/25/24

BEVIN
ESPOSITO

 Digitally signed by BEVIN
ESPOSITO
Date: 2024.04.25 10:46:20
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