

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9



IN THE MATTER OF:)	Docket No.
Torrent Laboratory, Inc.)	RCRA-09-2025-0067
483 Sinclair Frontage Road)	
Milpitas, CA)	
EPA ID. No. CAL000145952)	EXPEDITED SETTLEMENT
)	AGREEMENT AND
)	
Respondent.)	FINAL ORDER
)	
_____)	

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. By copy of this letter, EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA as required by Section 3008(a)(2).
3. Failure to Determine Generator Category: The Respondent failed to determine its generator category in violation of Title 22 California Code of Regulations ("CCR") § 66162.13 [40 Code of Federal Regulations ("CFR") § 262.13].
4. Failure to Close a Hazardous Waste Container: The Respondent failed to meet the conditions for exemption for satellite accumulation; specifically, failed to keep a Satellite Accumulation Area (SAA) hazardous waste container closed at all times, except when adding, removing or consolidating waste in violation of Title 22 CCR § 66262.15(a)(4) [40 CFR § 262.15(a)(4)].
5. Failure to Label a Container: Failure to meet the conditions for exemption for satellite accumulation; specifically, failure to mark or label a SAA hazardous waste container with the words "Hazardous Waste" and an indication of the hazards of the contents violation of Title 22 CCR § 66262.15(a)(5)(i-ii) [40 CFR § 262.15(a)(5)(i-ii)]
6. Failure to Label a Container: Failure to meet the conditions for exemption for satellite accumulation; specifically, failure to mark or label a SAA hazardous waste container with the composition and physical state of the wastes, the name and address of the person generating the waste, and the date that hazardous waste accumulation begins shall be clearly marked and visible for inspection on each container used for accumulation of hazardous waste violation of Title 22 CCR § 66262.15(a)(5)(B and D-E)

7. Failure to Place Signs Near Ignitable Waste: The Respondent failed to conspicuously place "No Smoking" signs in a location where there is a hazard from ignitable waste in violation of Title 22 CCR § 66262.17(a)(1)(F)(2) [40 CFR § 262.17(a)(1)(vi)(B)].
8. Failure to Develop Training Program and Train Personnel: Failure to meet the requirements to accumulate hazardous waste on site without a permit or interim status; specifically, failure to ensure that facility personnel successfully complete the training program through classroom, computer-based, or electronic instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with the requirements of Title 22 CCR Division 4.5 Chapter 12 and Title 8 CCR section 5192, subsection (p), failure to teach facility personnel hazardous waste management procedures, and failure to have a training program designed to ensure facility personnel are able to respond effectively to emergencies in violation of Title 22 CCR § 66262.17(a)(7)(A)-(C) [40 CFR § 262.17(a)(7)(i)-(iii)].
9. Failure to Obtain an EPA Identification Number: The Respondent failed to receive an EPA identification number from the Administrator by applying to the Department of Toxic Substances Control (DTSC) using U.S. EPA form 8700-12 prior to offering hazardous waste for transportation and failed to re-notify the Department in even-numbered years in violation of Title 22 CCR § 66262.18 [40 CFR § 262.18].
10. Failure to Submit a Biennial Report: The Respondent failed to complete and submit a Biennial Report, using U.S. EPA form 8700-13A/B to the Department of Toxic Substances Control by March 1, 2024, for the 2023 reporting year in violation of Title 22 CCR § 66262.41(b) [40 CFR § 262.41(b)].
11. Failure to Submit Exception Report: Failure to submit an Exception Report to the Department when the generator has not received a signed copy of the manifest from the designated facility within 45 days of the date the waste was accepted by the initial transporter violation of Title 22 CCR § 66262.42(b)
12. Failure to Make Arrangements with Responders: Failure to make arrangements with local first responders violation of Title 22 CCR § 66262.261(c) [40 CFR § 262.261(c)]
13. Failure to Develop Quick Reference Guide: Failure to develop a quick reference guide for local emergency responders in July 2024 violation of Title 22 CCR § 66262.262(b) & (c) [40 CFR 262.262(b)]
14. EPA and Respondent agree that settlement of this matter for civil penalties of fifteen thousand Dollars (\$15,000) is in the public interest.
15. 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 issues 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 files ESA. 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.

16. 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; Respondent has submitted true and accurate documentation of such correction; and, Respondent has submitted proof of payment of the civil penalty.
17. The undersigned representative of Respondent certifies that he or she is fully authorized to enter into the terms and conditions of this Expedited Settlement Agreement and Final Order and to execute and legally bind Respondent to it.
18. EPA reserves all 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.
19. Each party shall bear its own costs and fees, if any.
20. This Agreement is binding on the parties signing below, and in accordance with 40 C.F.R. § 22.31(b), is effective upon filing.
21. No portion of the civil penalty or interest paid by Respondent pursuant to the requirements of this CAFO shall be claimed by Respondent as a deduction for federal, states or local income tax purposes.

In the matter of Torrent Laboratory, Inc.

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22. Entry of the Final Order shall constitute full settlement of the civil claims alleged herein.

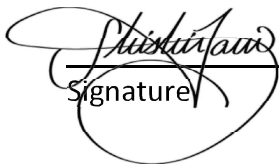
IT IS SO AGREED,

Shishir Jani

Name (print):

General Counsel

Title (print):


Signature

Date: 25 July 2025

APPROVED BY EPA:

AMY MILLER-BOWEN

Digitally signed by AMY MILLER-
BOWEN
Date: 2025.09.05 09:14:11 -07'00'

Amy C. Miller-Bowen, Director

Enforcement and Compliance Assurance Division

U.S. EPA Region 9


Date: 9/5/25

FINAL ORDER

Respondent has paid the above penalty. This Expedited Settlement Agreement and Final Order shall be entered.

IT IS SO ORDERED:

Beatrice
Wong

 Digitally signed by
Beatrice Wong
Date: 2025.09.17
09:11:53 -07'00'

Beatrice Wong
Regional Judicial Officer
U.S. EPA Region 9

Date: _____

CERTIFICATE OF SERVICE

I hereby certify the foregoing Expedited Settlement Agreement and Final Order in the matter of Torrent Laboratory, Inc. (Docket No. RCRA-09-2025-0067) was filed by the Regional Hearing Clerk, U.S. EPA, Region IX, 75 Hawthorne Street, San Francisco, CA 94105, and that a true and correct copy of the same was served on the parties, via electronic mail, as indicated below:

RESPONDENT(S): Mukesh Jani
Lab Director
Torrent Laboratory, Inc.
483 Sinclair Frontage Road
Milpitas, CA 95035
Mukesh.Jani@torrentlaboratory.com

COMPLAINANT: Andrew Helmlinger
Supervisory Attorney Adviser
U.S. EPA – Region IX
Hazardous Waste Section I (ORC-3-1)
75 Hawthorne Street
San Francisco, CA 94105
Helmlinger.Andrew@epa.gov

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Regional Hearing Clerk
U.S. EPA – Region IX