

- when referring to the Federal regulations incorporated by the Virginia regulations.
4. On February 13, 2026, EPA sent a letter to Virginia, through the Virginia Department of Environmental Quality (“VADEQ”), giving prior notice of this enforcement action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).
 5. At its facility, Greystone of Virginia, located at 7992 Richmond Road Toano, Virginia (“Facility”), Respondent performs chrome plating and anodizing for a variety of clients including aerospace, defense, hydraulics, medical, and semiconductors. The Facility generates Chrome Debris Contaminated (D007), Filter Cake (F006), Waste Chromic Acid Solution with Sodium Hydroxide (D002, D007), Waste Chromic Acid Sludge (D002, D005, D006, D007, D008), Waste Chromium with formic acid (D007), MEK liquid and solid (D001, D035, F005), and Anodize solution (D002). On January 29, 1992 Respondent submitted a notification to VADEQ that the Facility was a large quantity generator (“LQG”) of hazardous waste at the Facility, and VADEQ assigned RCRA ID No. VAD988211850 to the Facility.
 6. Complainant alleges that, at all times relevant to the allegations described in this Agreement, Respondent was and continues to be a Corporation and is therefore a “person,” as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and 9 VAC 20-60-260.A, and at all times relevant to the allegations in this Agreement was the “operator” and the “owner” of a “facility,” described in Paragraph 5, as those terms are defined in 40 C.F.R. § 260.10, as incorporated by reference in 9 VAC 20-60-260.A.
 7. At all times relevant to the allegations described in this Agreement, Respondent “stored” chrome debris contaminated (D007), filter cake (F006), waste chromic acid solution with sodium hydroxide (D002, D007), waste chromic acid sludge (D002, D005, D006, D007, D008), waste chromium with formic acid (D007), MEK liquid and solid (D001, D035, F005), and Anodize solution (D002), which are “hazardous waste(s)” from the Facility, as the terms “stored” and “hazardous waste” are defined in 40 C.F.R. § 260.10, as incorporated by reference in 9 VAC 20-60-260.A.
 8. On August 26, 2025, an EPA representative conducted a Compliance Evaluation Inspection (“CEI”) at the Facility to determine compliance with the applicable hazardous waste regulations.
 9. Based on the observations during the Inspection, Complainant alleges and finds that Respondent failed to comply with specific requirements of Subtitle C of RCRA, 42 U.S.C. §§ 6921 *et seq.*, its implementing regulations at 40 C.F.R. Parts 262, 264, 265, and the federally authorized Virginia Hazardous Waste Management Regulations (“VaHWMR”) codified at 9 VAC 20-60-12, *et seq.*
 10. Complainant has identified the following violations at the Facility:
 - a. On at least August 26, 2025, Respondent operated the Facility without a permit or interim status, in violation of 9 VAC 20-60-270.A, which incorporates 40 C.F.R. §

270.1(b) by reference. At the time of the inspection, Respondent failed to comply with the conditions for the temporary storage of hazardous waste by a generator that are required pursuant to 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17, and therefore failed to qualify for an exemption from the permitting/interim status requirements. The following acts or omissions prevented Respondent from meeting the regulatory permit exemption conditions set forth at 9 VAC 20-60-262:

- (1) Respondent failed to mark or label a container of hazardous waste with the words “Hazardous Waste”, as required by 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17 (a)(5)(i)(A). During the CEI the inspector observed the following containers not labeled “Hazardous Waste”.
 - a. A 55-gallon container collecting flammable (D001) contents from aerosol cans located in the Maintenance Area.
 - b. A 250-gallon tote containing corrosive waste (D002) stored in the hazardous waste accumulation area.
 - c. A cubic yard container with some amount of filter cake (F006) in the Wastewater Treatment Room underneath the filter press.
- (2) Respondent failed to mark or label a container of hazardous waste with an indication of the hazards of the contents, as required by 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17 (a)(5)(i)(B). During the CEI the inspector observed the following containers not marked or labeled with the indication of the hazards.
 - a. A cubic yard container with some amount of filter cake (F006) in the Wastewater Treatment Room underneath the filter press.
 - b. One 30-gallon container collecting PPE and debris contaminated with chromium (D007) is located in the Precision Plating System Department.
- (3) Respondent failed to mark or label a container of hazardous waste with the date upon which each period of accumulation begins clearly visible for inspection on each container, as required by 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17 (a)(5)(i)(C). During the CEI the inspector observed the following containers not marked or labeled with the date upon which each period of accumulation begins
 - a. A 250-gallon tote containing corrosive waste (D002) stored in the hazardous waste accumulation area.
 - b. A cubic yard container with some amount of filter cake (F006) in the

Wastewater Treatment Room underneath the filter press.

- (4) Respondent failed to maintain and operate a facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, in violation of VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17 (a)(6) and 40 C.F.R. § 262.251.
 - a. During the CEI the inspector observed filter cake (F006) on the floor underneath the filter press located in the Wastewater Treatment Room.
- (5) Respondent failed to inspect, at least weekly, areas where hazardous waste containers are stored, as required by 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17 (a)(1)(v).
 - a. During the CEI the inspector reviewed the Facility's weekly inspection records. The inspector observed two weeks undocumented for from June 20, 2023, to July 19, 2023 and two weeks undocumented from March 19, 2024 to April 3, 2024.
- (6) Respondent failed to describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, as required by 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17 (a)(6) and 40 C.F.R. § 262.261(c). During the CEI the inspector reviewed the Facility's Contingency Plan, which did not describe the arrangement the Facility has with the local authorities.
- (7) Respondent failed to provide an annual review of the initial training that ensures that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems as required under 9 VAC 20-60-262, which incorporates by reference 40 CFR § 262.17 (a)(7)(iii).
 - a. During the CEI the Inspector did not observe training records for Nicholas Gold (signer of UHWM in 2024), Stephen Lind (secondary emergency coordinator), Allen Wynne and John Duball (weekly inspector for the hazardous waste accumulation area).
- (8) Respondent failed to maintain a written job description for each position related to hazardous waste management as required under 9 VAC 20-60-262, which incorporates by reference 40 CFR § 262.17 (a)(7)(iv)(B). During the CEI the facility provided documents to the inspector for "Chem Lab Coach" and "Laboratory Technician". The job descriptions did not describe

the hazardous waste duties each position is to perform.

- b. Respondent failed to maintain and operate a facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, in violation of VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17 (a)(6) and 40 C.F.R. § 262.251.
 - (1) During the CEI the inspector observed filter cake (F006) on the floor underneath the filter press located in the Wastewater Treatment Room.
- c. Respondent failed to inspect, at least weekly, areas where hazardous waste containers are stored, as required by 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17 (a)(1)(v).
 - (1) During the CEI the inspector reviewed the Facility's weekly inspection records. The inspector observed two weeks undocumented for from June 20, 2023, to July 19, 2023 and two weeks undocumented from March 19, 2024 to April 3, 2024.
- d. Respondent failed to describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, as required by 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. § 262.17 (a)(6) and 40 C.F.R. § 262.261(c). During the CEI the inspector reviewed the Facility's Contingency Plan, which did not describe the arrangement the Facility has with the local authorities.
- e. Respondent failed to provide an annual review of the initial training that ensures that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems as required under 9 VAC 20-60-262, which incorporates by reference 40 CFR § 262.17 (a)(7)(iii).
 - (1) During the CEI the Inspector did not observe training records for Nicholas Gold (signer of UHWM in 2024), Stephen Lind (secondary emergency coordinator), Allen Wynne and John Duball (weekly inspector for the hazardous waste accumulation area).
- f. Respondent failed to maintain a written job description for each position related to hazardous waste management as required under 9 VAC 20-60-262, which incorporates by reference 40 CFR § 262.17 (a)(7)(iv)(B). During the CEI the facility provided documents to the inspector for "Chem Lab Coach" and "Laboratory Technician". The job descriptions did not describe the hazardous waste duties each position is to perform.

17. 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 the Agreement.
18. 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. In addition, this settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Sections 22.18(c) and 22.31(a) of the Consolidated Rules of Practice. Further, EPA reserves any rights and remedies available to it under the RCRA, the RCRA regulations promulgated, and any other federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this Agreement, following its filing with the Regional Hearing Clerk.
19. Late payment of the agreed upon penalty may subject Respondent to interest, administrative costs and late payment penalties in accordance with 40 C.F.R. § 13.11.
20. This Agreement is effective upon filing, in accordance with 40 C.F.R. § 22.31(b).
21. The undersigned representative certifies that she/he is fully authorized to execute this Agreement and to legally bind Greystone of Virginia, Inc.
22. As permitted under 40 CFR § 22.6, the Regional Hearing Clerk will serve copies of this Agreement and Final Order by e-mail to the parties at the following valid e-mail addresses: forostiak.stephen@epa.gov (for Complainant), and chriwats@greyst.com (for Respondent).
23. By signing this Agreement, Respondent acknowledges that this Agreement and Final Order will be available to the public and represents that, to the best of Respondent's knowledge and belief, this Agreement and Final Order does not contain any confidential business information or personally identifiable information from Respondent.

For Respondent: Greystone of Virginia, Inc.

Date: 4/11/2026

By: Chris P. Watson
Chris Watson
Process Engineer

For Complainant: U.S. Environmental Protection Agency, Region 3

After reviewing the Agreement and other pertinent matters, I, the undersigned Acting Director of the Enforcement and Compliance Assurance Division of the United States Environmental Protection Agency, Region 3, agree to the terms and conditions of this Agreement and recommend that the Regional Administrator, or his/her designee, the Regional Judicial Officer, issue the attached Final Order.

Acting Director
Enforcement and Compliance Assurance Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103



In the Matter of: : DOCKET NO.: RCRA-03-2026-0131
: :
Greystone of Virginia, Inc. : :
7992 Richmond Road : : EXPEDITED SETTLEMENT AGREEMENT AND
Toano, Virginia 23168 : : FINAL ORDER
: :
: : Proceeding under Section
: : 3008(a) and (g) of the Resource Conservation
: : and Recovery Act, as amended, 42 U.S.C.
: : § 6928(a) and (g)
: :

FINAL ORDER

Pursuant to 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 Consent Agreement resolving this matter is hereby ratified and incorporated by reference into this Final Order.

The Respondent is hereby **ORDERED** to comply with all of the terms of the Consent Agreement.

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.

By: _____
Regional Judicial and Presiding
Officer U.S. EPA, Region 3

