

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

11/20/20 AM 9:21
ENVIRONMENTAL PROTECTION
AGENCY REGION VII
REGIONAL HEARING CLERK

IN THE MATTER OF:)
)
St. Anthony's Medical Center)
10010 Kennerly Road)
St. Louis, Missouri 63128)
)
RCRA ID: MOD077118610)
)
Respondent.)
)
Proceeding under Section 3008(a) and (g) of)
the Resource Conservation and Recovery)
Act as amended, 42 U.S.C. § 6928(a) and (g))
_____)

**CONSENT AGREEMENT
AND FINAL ORDER**

Docket No. RCRA-07-2011-0028

The United States Environmental Protection Agency (EPA), Region 7 (Complainant) and St. Anthony's Medical Center (Respondent) have agreed to a settlement of this action before the filing of a complaint, and thus this action is simultaneously commenced and concluded pursuant to Rules 22.13(b) and 22.18(b)(2) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits (Consolidated Rules of Practice), 40 Code of Federal Regulations (C.F.R.) §§ 22.13(b) and 22.18(b)(2).

Jurisdiction

This administrative action is being conducted pursuant to Sections 3008(a) and (g) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA or the Act), and the Hazardous and Solid Waste Amendments of 1984 (HSWA), 42 U.S.C. § 6928(a) and (g), and in accordance with the Consolidated Rules of Practice.

1. This Consent Agreement and Final Order (CA/FO) serves as notice that the EPA has reason to believe that Respondent violated Section 3005 of RCRA, 42 U.S.C. § 6925.

Parties

2. The Complainant is the Chief of the RCRA Waste Enforcement and Materials Management Branch in the Air and Waste Management Division of the EPA, Region 7, as duly delegated from the Administrator of the EPA.

3. The Respondent is St. Anthony's Medical Center, a not for profit corporation registered in the State of Missouri. Respondent is a "person" as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

Statutory and Regulatory Framework

4. The State of Missouri has been granted authorization to administer and enforce a hazardous waste program pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926. The State of Missouri has adopted by reference the federal regulations cited herein at pertinent parts in the Missouri Code of State Regulations (C.S.R.) in Title 10, Division 25. Section 3008 of RCRA, 42 U.S.C. § 6928, authorizes EPA to enforce the provisions of the authorized State program and the regulations promulgated thereunder. When the EPA determines that any person has violated or is in violation of any RCRA requirement, EPA may issue an order assessing a civil penalty for any past or current violation and/or require immediate compliance or compliance within a specified time period pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. In the case of a violation of any RCRA requirement, where such violation occurs in a state which is authorized to implement a hazardous waste program pursuant to Section 3006 of RCRA, EPA shall give notice to the state in which such violation has occurred or is occurring prior to issuing an order. The State of Missouri has been notified of this action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

5. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes a civil penalty of not more than \$25,000 per day for violations of Subchapter III of RCRA (Hazardous Waste Management). This figure has been adjusted upward for inflation pursuant to the Civil Monetary Penalties Inflation Adjustment Rule, 40 C.F.R. Part 19, so that penalties of up to \$32,500 per day are now authorized for violations of Subchapter III of RCRA that occur after March 15, 2004, though January 12, 2009. For violations of Subchapter III of RCRA that occur after January 12, 2009, penalties of up to \$37,500 per day are now authorized.

6. Pursuant to the regulations set forth 40 C.F.R. Part 262 and 10 C.S.R. 25-5.262, generators of solid waste must perform hazard waste determinations on all solid wastes.

7. Section 3005 of RCRA, 42 U.S.C. § 6925, and the regulations at 40 C.F.R. § 270.1(b) and 10 C.S.R. 25-7.270, require each person owning or operating a facility for the treatment, storage, or disposal of a hazardous waste identified or listed under Subchapter C of RCRA to have a permit for such activities.

8. The regulations at 40 C.F.R. § 262.34(d) and 10 C.S.R. 25-5.262, allow a generator to accumulate hazardous waste in containers on-site for one hundred eighty without a permit or without interim status, provided the conditions listed in 40 C.F.R. §§ 262.34(d)(1)-(5) and 10 C.S.R. 25-5.262 are met. These conditions include compliance with various hazardous waste regulatory requirements.

9. The regulations at 10 C.S.R. 25-16.273, incorporating 40 C.F.R. Part 273 set forth the standards for generators of universal waste.
10. The regulations at 10 C.S.R. 25-11.279 (1) incorporating 40 C.F.R. 279.22(c)(2), set forth the standards for generators of used oil.

Factual Background

11. Respondent owns and operates the facility located at 10010 Kennerly Road, St. Louis, Missouri 63128.
12. On or about March 3, 2003, Respondent notified EPA that it is a small quantity generator of hazardous waste. As part of its operations, Respondent generates hazardous waste each year to be classified as a Small Quantity Generator (SQG) pursuant to 40 C.F.R. Part 262 and 10 C.S.R. 25-5.262.
13. The regulations for determining whether a waste is a solid and/or hazardous waste are set forth at 10 C.S.R. 25-4.261, which incorporate by reference the regulations at 40 C.F.R. Part 261.
14. Respondent has been assigned a RCRA facility identification number of MOD077118610.
15. On or about May 11-12, 2010, an EPA representative conducted a Compliance Evaluation Inspection at Respondent's facility (hereinafter "the EPA inspection").
16. Respondent was inspected as a small quantity generator of hazardous waste. Small quantity generators generate between 100 and 1,000 kilograms of hazardous waste per month, pursuant to 40 C.F.R. Part 262 and 10 C.S.R. 25-5.262.
17. During the inspection, it was documented that Respondent accumulated listed and characteristic hazardous waste with the following hazardous waste codes: D0001, D002, D003, D009, D035, F002, F003, and F005. Respondent is also a used oil generator and small quantity handler of universal waste, accumulating less than 5,000 kilograms of universal waste at any time.
18. The regulations for determining whether a waste is a solid and/or hazardous waste are set forth at 40 C.F.R. Part 261 and 10 C.S.R. 10 C.S.R. 25-4.261. Each of the wastes listed in Paragraph 16 are a "solid waste" and a "hazardous waste" within the meaning of these regulations.

19. Respondent operates a 180 days or less hazardous waste storage container area at the facility.

20. Based on information obtained during the 2010 inspection, Respondent was issued a Notice of Preliminary Findings for, among other things, failure to make a hazardous waste determinations on four waste streams, operating as a treatment, storage, or disposal facility without a RCRA Permit or RCRA Interim Status by violating various generator requirements, including failing to label hazardous waste storage containers, failing to label satellite accumulation containers, failing to date satellite accumulation containers, failing to maintain closed satellite accumulation containers, failing to conduct weekly inspections of hazardous waste storage containers, and various emergency preparedness violations, by failing to label containers with "Universal Waste – Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)," failure to date or otherwise track universal waste (lamps) to demonstrate length of time of accumulation, and failure to label containers containing used oil with the words "used oil."

Violations

21. Complainant hereby states and alleges that Respondent has violated RCRA and federal and state regulations promulgated there under, as follows:

Count 1

FAILURE TO MAKE A HAZARDOUS WASTE DETERMINATION

22. The allegations stated in paragraphs 1 through 20 are re-alleged and incorporated as if fully set forth herein.

Failure to Make a Hazardous Waste Determination

23. The regulations at 10 C.S.R. 25-5.262(1) and by incorporation 40 C.F.R. § 262.11 requires that a generator of solid waste must determine if that waste is a hazardous waste.

24. At the time of May 2010 inspection, Respondent was disposing of chemotherapy waste such as dispensing equipment, IV bags, syringes, tubing, gloves, and masks in the bio-hazardous waste, disposing of solvent soaked rags in the general trash, disposing of damaged, partially used and patient contacted pharmaceuticals (pills, ointments, creams, tablet, aerosol inhalers, etc.) with the bio-hazardous waste, and disposing of spent paint booth filters in the general trash without conducting hazardous waste determination on these waste streams.

25. Respondent's failure to make a hazardous waste determination on the above referenced waste streams is a violation of 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.11.

Count 2

**OPERATING AS A TREATMENT, STORAGE, OR DISPOSAL FACILITY
WITHOUT A RCRA PERMIT OR RCRA INTERIM STATUS**

26. The allegations stated in paragraphs 1 through 20 are realleged and incorporated as if fully set forth herein.

27. Section 3005 of RCRA, 42 U.S.C. § 6925, R.S.Mo. 260.390.1(1), and the regulations at 10 C.S.R. 25-7.270 incorporating by reference 40 C.F.R. § 270.1(b), require each person owning or operating a facility for the treatment, storage, or disposal of a hazardous waste identified or listed under Subchapter C of RCRA to have a permit for such activities.

28. At the time of the EPA inspection, Respondent did not have a permit or interim status for their facility.

29. The regulations at 10 C.S.R. 25-5.262(1), which incorporate by reference 40 C.F.R. § 262.34(a), allow a generator to accumulate hazardous waste in containers on-site for up to one hundred and eighty (180) days without a permit or without interim status, provided the conditions listed in 40 C.F.R. § 262.34(a)(1)-(4) are met. These conditions include compliance with other hazardous waste generator requirements.

30. At the time of the inspection, Respondent was not complying with various hazardous waste generator requirements, described below. Therefore, Respondent did not meet the exception to the regulation that allows generators to store hazardous waste at their facility for up to 180 days without a permit or interim status so long as they meet hazardous waste regulatory requirements.

Failure to Comply with Generator Requirements

Failure to label storage containers

31. The regulations at 10 C.S.R. 25-5.262(2)(c)(1) require that the hazardous waste storage containers be marked per Department of Transportation (DOT) requirements.

32. At the time of the EPA inspection, one drum of lab waste in the morgue and a one-gallon pail of waste paint in the Central Maintenance area were not marked per DOT storage requirements.

33. Respondent 10 C.S.R. 25-5.262(2)(c)(1) by not properly labeling storage containers per Department of Transportation requirements.

Undated satellite accumulation containers

34. Missouri regulation 10 C.S.R. 25-5.626(1) incorporating 40 C.F.R. 262.34(d)(4) referencing 40 C.F.R. 262.34(a)(2), requires generators to mark the accumulation start date on satellite storage accumulation containers.

35. At the time of the EPA inspection, a 55-gallon container of lab waste in the morgue, a one-gallon pail of waste paint in Central Maintenance, and a five-gallon container of waste solvent did not display the initial date of accumulation of waste.

36. Respondent violated 10 C.S.R. 25-5.626(1), incorporating 40 C.F.R. 262.34(d)(4) referencing 40 C.F.R. 262.34(a)(2), by not marking the accumulation start date on satellite storage accumulation containers.

Unlabeled satellite accumulation containers

37. The regulations at 10 C.S.R. 25-5.262.1 incorporating 40 C.F.R. 262.34(d)(4) referencing 40 C.F.R. 262.34(a)(3), require that satellite accumulation containers be labeled with the words "Hazardous Waste" or with words that identify the contents of the containers.

38. At the time of the EPA inspection Respondent's satellite accumulation containers were not labeled with the words "Hazardous Waste."

39. Respondent violated 10 C.S.R. 25-5.262.1, incorporating 40 C.F.R. 262.34(d)(4) referencing 40 C.F.R. 262.34(a)(3), when it failed to label its satellite accumulation containers.

Open satellite accumulation containers

40. The regulations at 10 C.S.R. 25-5.262(I) incorporating 40 C.F.R. 262.34(c) (I)(i) referencing 40 C.F.R. 265.173(a) require that satellite accumulation containers be closed during storage.

41. At the time of the EPA inspection, the inspector documented an open one-gallon container of lab waste in the histology lab satellite accumulation area.

42. Respondent violated 10 C.S.R. 25-5.262(I) incorporating 40 C.F.R. 262.34(c) (I)(i) referencing 40 C.F.R. 265.173(a), when it failed to close its satellite accumulation containers.

Failure to conduct weekly inspections of hazardous waste storage containers

43. The regulations at 10 C.S.R. 25-5.262(2).C(I)(II) referencing 40 C.F.R. 265.174 require generators to conduct weekly inspection of hazardous waste storage containers.

44. At the time of the EPA inspection, one 55-gallon container of lab waste in the

morgue, one pail of waste paint in Central Maintenance, and one 5-gallon red container of waste solvent did not have documentation that container was regularly inspected.

45. Respondent violated 10 C.S.R. 25-5.262(2).C(I)(II) referencing 40 C.F.R. 265.174, by failing to conduct weekly inspection of hazardous waste storage containers.

Emergency Preparedness Violations

46. The regulations at 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(d)(s)(ii)(A) require that the Emergency Coordinator's name and phone number be posted near the telephone, in violation of 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(d)(s)(ii)(A).

47. At the time of the EPA inspection, the Inspector observed that the Emergency Contact and phone number was not posted near the phones in the Lab and Central Maintenance areas.

48. The regulations at 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(d)(5)(ii)(c) require that generators post the telephone number of the fire department near the telephones.

49. At the time of the EPA inspection, the Inspector observed that the Fire Department telephone number was not posted next to at least one telephone in the Lab and Central Maintenance areas, in violation of 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(d)(5)(ii)(c).

50. The regulations at 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(d)(5)(ii)(B) require that the location of the fire extinguishers and spill control equipment be posted near the telephone.

51. At the time of the EPA inspection, the Inspector observed that the fire extinguishers and spill-control equipment were not posted next to a least one telephone, in violation of 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(d)(5)(ii)(B).

52. The regulations at 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(d)(5)(iii) require that employees be familiar with hazardous waste handling and emergency procedures.

53. At the time of the EPA inspection, the inspector documented some facility employees were not familiar with proper waste handling procedures, in violation of 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(d)(5)(iii).

FAILURE TO COMPLY WITH USED OIL STORAGE REQUIREMENTS

54. The allegations stated in Paragraphs 1 through 20 above are realleged and incorporated as if fully set forth herein.

55. At the time of the 2010 inspection, the inspector observed the Respondent failed to comply with a number of used oil requirements, described below.

Failure to Label Used Oil Containers

56. The regulation at 10 C.S.R. 25-11.279 (1) incorporating 40 C.F.R. 279.22(c)(2) requires that containers and above ground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

57. At the time of the 2010 inspection, the inspector observed that two 55-gallon drums used were not properly labeled with the words "used oil" in the Central Utility Plant.

58. Respondent's failure to properly label containers of used oil with the words "Used Oil" is a violation of 10 C.S.R. 25-11.279 (1) incorporating 40 C.F.R. 279.22(c)(2).

Count 4

FAILURE TO COMPLY WITH UNIVERSAL WASTE LAMP REQUIREMENTS

59. The allegations stated in Paragraphs 1 through 20 above are realleged and incorporated as if fully set forth herein.

60. 10 C.S.R. 25-16.273(1)(A) defines "Universal Waste" to include "lamps as described in 40 C.F.R. §273.5." At the time of the inspections, each facility had lamps that met this definition.

61. Section 3005 of RCRA, 42 U.S.C. § 6925, R.S.Mo. 260.370, and the regulations at 10 C.S.R. 25-16.273(1), incorporating by reference 40 C.F.R. § 273.35(a), require that a large quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

62. At the time of the 2010 inspection, the inspector observed the Respondent failed to comply with a number of universal waste requirements, described below.

Universal Waste Lamp Containers Incorrectly Labeled

63. Section 3005 of RCRA, 42 U.S.C. § 6925, R.S.Mo. 260.370, and the regulations at 10 C.S.R. 25-16.273(1), incorporating by reference 40 C.F.R. §§§§ 273.34(e), 273.14(e), 273.15(c) and 273.13(d), requires that each lamp or container in which such lamps are contained

must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)," must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste, and are managed in a way that prevents releases of any universal waste or component of a universal waste to the environment.

64. At the time of the EPA inspection, it was documented that numerous containers of spent fluorescent lamps were not labeled per the universal waste regulations.

65. Respondent's failure to properly label containers of universal waste is a violation of 10 C.S.R. 25-16.273(1) and, through incorporation, 40 C.F.R. § 273.14(e).

Failure to demonstrate the length of time Universal Waste Lamps were accumulated

66. Section 3005 of RCRA, 42 U.S.C. § 6925, R.S.Mo. 260.370, and the regulations at 10 C.S.R. 25-16.273(1), incorporating by reference 40 C.F.R. §§§§ 273.34(e), 273.14(e), 273.15(c) and 273.13(d), requires that each lamp or container in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)," must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste, and are managed in a way that prevents releases of any universal waste or component of a universal waste to the environment.

67. At the time of the EPA inspection, it was documented that one cardboard box containing 21 universal waste lamps did not have the earliest date of accumulation identified.

68. Respondent's failure to demonstrate the time that universal waste has been accumulated is a violation of 10 C.S.R. 25-16.273(1) and, through incorporation, 40 C.F.R. § 273.15(c).

III. CONSENT AGREEMENT

69. Respondent and EPA agree to the terms of this CA/FO and Respondent agrees to comply with the terms of this CA/FO.

70. Respondent admits the jurisdictional allegations of this CA/FO and agrees not to contest EPA's jurisdiction in this proceeding or any subsequent proceeding to enforce the terms of this CA/FO.

71. Respondent neither admits nor denies the factual allegations set forth in this CA/FO.

72. Respondent waives its right to a judicial or administrative hearing on any issue of fact or law set forth in this CA/FO, and its right to appeal the proposed Final Order portion of this CA/FO.

73. Respondent and Complainant agree to conciliate the matters set forth in this CA/FO without the necessity of a formal hearing and to bear their respective costs and attorney's fees.

74. This CA/FO resolves all civil administrative claims for the alleged RCRA violations identified in this Consent Agreement and Final Order. Complainant reserves the right to take enforcement action against Respondent for any violations of RCRA, or any violation of any other applicable law, not alleged in the CA/FO and to enforce the terms and conditions of this CA/FO.

75. Nothing contained in this CA/FO shall alter or otherwise affect Respondent's obligation to comply with all applicable federal, state, and local environmental statutes and regulations and applicable permits.

76. Respondent certifies that by signing this CA/FO that to the best of its information and belief, Respondent's facility is in compliance with all requirements of RCRA, 42 U.S.C. § 6901 *et. seq.* and all regulations promulgated thereunder.

77. The effect of settlement described in Paragraph 74 above is conditioned upon the accuracy of Respondent's representations to EPA, as memorialized in Paragraph 76 above of this CA/FO.

78. The undersigned representative of Respondent certifies that he or she is fully authorized to enter the terms and conditions of this CA/FO and to execute and legally bind Respondent to it.

79. This CA/FO shall apply to and be binding upon Respondent and Respondent's agents, successors and/or assigns. Respondent shall ensure that all contractors, employees, consultants, firms or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this CA/FO.

80. Respondent agrees that in settlement of the claims alleged in the Complaint, Respondent shall pay a mitigated civil penalty of \$42,952 as set forth in Paragraph 1 of the Final Order below.

81. The penalty specified in Paragraph 80 above shall represent civil penalties assessed by EPA and shall not be deductible for purposes of federal, state, or local income tax purposes.

82. **Late Payment Provisions:** Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. Interest will therefore begin to accrue on a civil or stipulated penalty if it is not paid by the date required. Interest will be assessed at a rate of the United States Treasury tax and loan rate in accordance with 31 C.F.R. § 901.9(b). A charge will be assessed to cover the costs of debt collection including processing and handling costs and attorneys fees. In addition, a non-payment penalty charge of six (6) percent per year compounded annually will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. Any such non-payment penalty charge on the debt will accrue from the date the penalty payment becomes due and is not paid. 31 C.F.R. §§ 901.9(c) and (d).

83. Respondent understands that failure to pay any portion of the civil penalty on the date the same is due may result in the commencement of a civil action in Federal District Court to collect said penalty, along with interest thereon at the applicable statutory rate.

84. Notwithstanding any other provision of this CA/FO, EPA reserves the right to enforce the terms of this CA/FO by initiating a judicial or administrative action under Section 3008 of RCRA, 42 U.S.C. § 6928, and to seek penalties against Respondent in an amount provided herein or, if not specified, an amount not to exceed \$37,500 per day per violation pursuant to Section 3008(c) of RCRA, for each day of non-compliance with the terms of the Final Order, or to seek any other remedy allowed by law.

85. This CA/FO shall be effective upon filing. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

FINAL ORDER

Pursuant to the authority of Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), and according to the terms of this CA/FO, IT IS HEREBY ORDERED THAT:

A. Payment of Civil Penalty

1. Within thirty (30) days of the effective date of this CA/FO, Respondent will pay a civil penalty of Forty-Two Thousand Nine Hundred and Fifty-Two Dollars (\$42,952). The payment must be received at the address below on or before 30 days after the effective date of the Final Order (the date by which payment must be received shall hereafter be referred to as the "due date"). Such payment shall identify Respondent by name and docket number and shall be by certified or cashier's check made payable to the "United States Treasury" and sent to:

US Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
PO Box 979077
St. Louis, Missouri 63197-9000.

2. Wire transfers should be directed to the Federal Reserve Bank of New York:

Federal Reserve Bank of New York
ABA = 021030004
Account = 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York, New York 10045

Field Tag 4200 of the Fedwire message should read
"D 68010727 Environmental Protection Agency"

3. A copy of the payment documentation shall also be mailed to:

Regional Hearing Clerk
U.S. EPA Region 7
901 North 5th Street
Kansas City, Kansas 66101

and to:

Kristen Nazar
Office of Regional Counsel
U.S. EPA Region 7
901 North 5th Street
Kansas City, Kansas 66106.

B. Parties Bound


4. This Final Order portion of this CA/FO shall apply to and be binding upon Complainant and Respondent, and Respondent's agents, successors and/or assigns. Respondent shall take steps to ensure that all contractors, employees, consultants, firms or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this CA/FO.

In the Matter of St. Anthony's Medical Center
Consent Agreement and Final Order
RCRA-07-2011-0028

FOR COMPLAINANT:

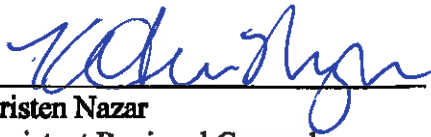
U.S. ENVIRONMENTAL PROTECTION AGENCY

8-29-11
Date



Donald Toensing
Chief
Waste Enforcement and Materials Management Branch
Air and Waste Management Division

8/26/11
Date



Kristen Nazar
Assistant Regional Counsel
Office of Regional Counsel

In the Matter of St. Anthony's Medical Center
Consent Agreement and Final Order
RCRA-07-2011-0028

FOR RESPONDENT:

ST. ANTHONY'S MEDICAL CENTER

By John T. Shean

Title EXEC VP - CFO

Signature John T. Shean

Date 8/07/14

In the Matter of St. Anthony's Medical Center
Consent Agreement and Final Order
RCRA-07-2011-0028

IT IS SO ORDERED. This Final Order is effective upon its final entry by the Regional Judicial Officer.

Aug. 30, 2011
Date

Robert Patrick
Robert Patrick
Regional Judicial Officer

IN THE MATTER OF St. Anthony's Medical Center, Respondent
Docket No. RCRA-07-2011-0028

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Consent Agreement and Final Order was sent this day in the following manner to the addressees:

Copy hand delivered to
Attorney for Complainant:

Kristen Nazar
Assistant Regional Counsel
Region 7
United States Environmental Protection Agency
901 N. 5th Street
Kansas City, Kansas 66101

Copy by Certified Mail Return Receipt to:

Linda Maciejewski
Director, Regulatory Standards
St. Anthony's Medical Center
10010 Kennerly Road
St Louis, Missouri 63128

Dated: 8/30/11


Kathy Robinson
Hearing Clerk, Region 7