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UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IX

U.S. EPA, REGION IX
REGIONAL HEARING CLERK

U.S. EPA, REGION IX
REGIONAL HEARING CLERK

In the matter of:)	U.S. EPA Docket No.:
)	RCRA - 09-2008-0012
)	
AERO-ELECTRIC CONNECTOR,)	CONSENT AGREEMENT
INC.,)	AND
)	FINAL ORDER
EPA Identification No.)	
CAL000146338)	
)	
Respondent.)	
_____)	

CONSENT AGREEMENT

A. PRELIMINARY STATEMENT

1. This is a civil administrative enforcement action instituted pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act ("RCRA") as amended, 42 U.S.C. § 6928(a)(1), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation /Termination or Suspension of Permits, 40 C.F.R. Part 22, as revised by 64 Fed. Reg. 141 (July 23, 1999). Complainant is the United States Environmental Protection Agency, Region IX ("EPA"). Respondent is Aero-Electric Connector, Inc. ("Aero-Electric" or "Respondent").

2. Aero-Electric is a designer and manufacturer of environmental and firewall-rated cylindrical connectors machined from aluminum, carbon steel, stainless steel and aluminum nickel bronze. The connectors have applications in a variety of markets, including military, aerospace, commercial and business aviation, marine applications, heavy equipment, telecommunications and general industry. Aero-Electric's facility is located at 548 Amapola Avenue, Torrance, CA 90501 (the "Facility"). In the course of operations at

the Facility, Aero-Electric generates and stores hazardous wastes in connection with its manufacturing activities. The Facility's EPA ID number is CAL000146338.

3. This Consent Agreement and Final Order ("CAFO"), pursuant to 40 CFR §22.13(b), simultaneously commences and concludes this proceeding, wherein EPA alleges that Aero-Electric failed to comply with the following requirements of Title 22 of the California Code of Regulations ("22 CCR"): (1) §66270.1¹ (*see also* 40 CFR §270.1) (storage of hazardous waste without a permit); (2) §66265.173(a) (*see also* 40 CFR §265.173(a))(failure to close containers of hazardous waste); (3) §66265.31 (*see also* 40 CFR §265.31)(failure to maintain the facility in such a manner as to minimize the possibility of a release); (4) §66265.174 (*see also* 40 CFR §265.174)(failure to perform weekly inspections of hazardous waste storage areas); (5) §66265.16 (*see also* 40 CFR §265.16)(failure to comply with hazardous waste training requirements); and (6) §66262.12(a) (*see also* 40 CFR §262.12(a)), (failure to obtain an EPA identification number). These are each in violation of Section 3001 *et seq.* of RCRA, 42 U.S.C. §6921 *et seq.* and state regulations adopted pursuant to the approved California hazardous waste management program.

B. JURISDICTION

4. On August 1, 1992, the State of California received authorization to administer the hazardous waste management program in lieu of the federal program pursuant to Section 3006 of RCRA, 42 U.S.C. §6926, and 40 CFR Part 271. This authorization was updated on September 26, 2001 (*see* 66 FR 49118, September 26, 2001). The authorized program is established pursuant the Hazardous Waste Control Law, Chapter 6.5 of Division 20 of the California Health and Safety Code ("H&SC"), and the regulations promulgated thereunder at Title 22, Division 4.5 of the California Code of Regulations, 22 CCR §§66001 *et seq.* The State of California has been authorized for all the regulations referenced in this CA/FO.

¹ Revisions to the authorized version of 22 CCR §66270.1 do not affect the alleged violations set forth herein.

5. Respondent is a “person” as defined in 22 CCR §66260.10² (*see also* 40 CFR §260.10).
6. Respondent is the “operator” of a facility as defined in 22 CCR §66260.10 (*see also* 40 CFR §260.10).
7. Respondent is the “owner” of a facility as defined in 22 CCR §66260.10 (*see also* 40 CFR §260.10).
8. Respondent is a “generator” of hazardous waste as defined in 22 CCR §66260.10 (*see also* 40 CFR §260.10).
9. Respondent generates and stores materials that are “wastes” as defined in 22 CCR §§66260.10 and 66261.2³ (*see also* 40 CFR §§260.10 and 261.2).
10. At the Facility, Respondent generates hazardous waste as defined by California H&SC Section 25117, 22 CCR §§66260.10 and 66261.3⁴ (*see also* Section 1004(5) of RCRA, 42 U.S.C. §6903(5), 40 CFR §§260.10 and 261.3).⁵ This hazardous waste includes, but may not be limited to, waste electroless nickel solution (D006), waste hexavalent

² Revisions made to the authorized version of 22 CCR §66260.10 do not affect the alleged violations set forth herein.

³ Revisions made to the authorized version of 22 CCR §66261.2 do not affect the alleged violations set forth herein.

⁴ Revisions to the authorized versions of H&SC §25117 and 22 CCR §66261.3 do not affect the alleged violations set forth herein.

⁵ The definition of “hazardous waste” contained in the California statute and regulations is broader in scope than the definition contained in RCRA and the federal regulations. Those hazardous wastes regulated under California law, but not regulated under federal law are known as “California wastes” and the portions of the California statute and regulations governing California wastes were not included in the provisions authorized under RCRA. Thus, EPA enforces California’s authorized program but does not enforce those aspects of the California program relating solely to California wastes.

chromium (D007), waste aluminum deoxidizer (D002), waste nitric acid (D002), waste solid fluoride salts (D002), and contaminated floor water from the Facility's electroless plating line (D006).

11. On April 10, 2006, EPA conducted a RCRA compliance evaluation inspection ("CEI") at the Facility. Based upon the findings made during the CEI, and additional information obtained subsequent to the CEI, EPA determined that Respondent has violated California H&SC §§25100 *et seq.* and the regulations adopted pursuant thereto, as approved and authorized by the United States.
12. Section 3006 of RCRA, 42 U.S.C. §6926 provides, *inter alia*, that authorized state hazardous waste programs are carried out under Subtitle C of RCRA. Therefore, a violation of any requirement of law under an authorized state hazardous waste program is a violation of a requirement of Subtitle C of RCRA.
13. A violation of California's authorized hazardous waste program, found at H&SC §§25100 *et seq.*, constitutes a violation of Subtitle C of RCRA and, therefore, a person who violates California's authorized hazardous waste program is subject to the powers vested in the EPA Administrator by Section 3008 of RCRA, 42 U.S.C. §6928.
14. Section 3008 of RCRA, 42 U.S.C. §6928, authorizes the EPA Administrator to issue orders requiring compliance immediately or within a specified time for violation of any requirement of Subtitle C of RCRA, Section 3001 of RCRA *et seq.*, 42 U.S.C. §6921, *et seq.*
15. The Administrator has delegated the authority under Section 3008 of RCRA, 42 U.S.C. §6928, to the EPA Regional Administrator for Region IX, who has re-delegated this authority to the Director of the Waste Management Division.

C. ALLEGED VIOLATIONS

COUNT 1

Storage of Hazardous Waste Without a Permit or Interim Status

16. Paragraphs 1 through 15 above are incorporated herein by this reference as if they were set forth here in their entirety.

17. 22 CCR §66262.34⁶ (*see also* 40 CFR §262.34) allows generators of hazardous waste to store hazardous waste on-site for certain specified time periods without a permit or interim status as long as they comply with specified waste management practices, including the labeling of hazardous waste containers. Generators who do not comply with the waste management requirements must either be eligible for interim status or obtain a permit in order to store hazardous waste at the facility pursuant to 22 CCR §66270.1 (*see also* 40 CFR §270.1).
18. In order to be eligible to store hazardous waste without a permit or interim status for less than 90 days, generators of hazardous waste must mark containers of hazardous waste with the date they start accumulating hazardous waste in each container and mark each container clearly with the words “Hazardous Waste” pursuant to 22 CCR §66262.34(f).
19. At the time of the CEI, Respondent stored numerous containers of hazardous waste without indicating the start date of accumulation of the hazardous waste or with the words “Hazardous Waste,” thus failing to comply with two of the conditions for being able to store hazardous waste for less than 90 days without a permit or interim status.
20. At the time of the CEI, Respondent was not eligible for interim status under RCRA nor was Respondent in possession of a permit to store hazardous waste.
21. Therefore, EPA alleges that Aero-Electric has violated 22 CCR §66270.1 (*see also* 40 CFR §270.1), and RCRA.

COUNT 2

Failure to Close Containers of Hazardous Waste

22. Paragraphs 1 through 21 above are incorporated herein by this reference as if they were set forth here in their entirety.

⁶ Revisions to the authorized version of 22 CCR §66262.34 do not affect the alleged violations set forth herein.

23. 22 CCR §66265.173(a) (*see also* 40 CFR §265.173(a)) requires generators of hazardous waste who store such waste on-site to ensure that, among other things, the waste is placed in closed containers.
24. At the time of the CEI, numerous containers of hazardous waste stored at the Facility were not closed.
25. Therefore, EPA alleges that Aero-Electric has violated 22 CCR §265.173(a), (*see also* 40 CFR §265.173), and RCRA.

COUNT 3

Failure to Maintain the Facility in Such a Manner as to Prevent Releases

26. Paragraphs 1 through 25 above are incorporated herein by this reference as if they were set forth here in their entirety.
27. Pursuant to 22 CCR §66265.31, hazardous waste generators who store hazardous waste must operate the facility in such a manner so as to minimize the possibility of a release of hazardous waste from or at the facility.
28. At the time of the CEI, the walkway beside the Facility's plating line contained residues of spilt liquid that tested positive as a corrosive hazardous waste. Moreover, the Facility's hazardous waste housekeeping practices were extremely poor, making proper management extremely difficult and presenting a greater risk of releases of hazardous waste.
29. Therefore, EPA alleges that Aero-Electric violated 22 CCR §66265.31 (*see also* 40 CFR §265.31), and RCRA.

COUNT 4

Failure to Perform Weekly Inspections

30. Paragraphs 1 through 29 above are incorporated herein by this reference as if they were set forth here in their entirety.

31. Pursuant to 22 CCR §66265.174, hazardous waste generators who store hazardous waste must conduct weekly inspections of their facility's hazardous waste storage areas (*see also* 40 CFR §265.174).
32. At the time of the CEI, no weekly inspections were being conducted at any of the Facility's hazardous waste storage areas.
33. Therefore, EPA alleges that Aero-Electric violated 22 CCR §66265.174 (*see also* 40 CFR §265.174), and RCRA.

COUNT 5

Failure to Comply With Hazardous Waste Training Requirements

34. Paragraphs 1 through 33 above are incorporated herein by this reference as if they were set forth here in their entirety.
35. Pursuant to 22 CCR §66265.16, hazardous waste generators who store hazardous waste must properly train employees who handle hazardous waste, provide annual refresher training to the facility's representative in charge of hazardous waste and maintain records relating to each worker receiving training (*see also* 40 CFR §265.16).
36. At the time of the CEI, no training records had been maintained for any of the employees at the Facility and no annual refresher training had been provided to the Facility's representative in charge of hazardous waste.
37. Therefore, EPA alleges that Aero-Electric violated 22 CCR §66265.16 (*see also* 40 CFR §265.16), and RCRA.

COUNT 6

Failure to Obtain an EPA Identification Number

38. Paragraphs 1 through 37 above are incorporated herein by this reference as if they were set forth here in their entirety.
39. Pursuant to 22 CCR §66262.12(a), hazardous waste generators must obtain an EPA identification number to enable tracking of all hazardous waste to its ultimate disposal destination (*see also* 40 CFR §262.12(a)).

40. At the time of the CEI, the Facility had obtained a California State identification number (used for tracking waste considered hazardous by the State of California, but not considered hazardous under RCRA). However, the Facility did not have an EPA identification number.
41. Therefore, EPA alleges that Aero-Electric violated 22 CCR §66262.12(a) (*see also* 40 CFR §262.12(a)), and RCRA.

D. TERMS OF SETTLEMENT

42. Respondent Aero-Electric consents to the assessment of a civil penalty of ONE HUNDRED AND TWENTY THOUSAND DOLLARS (\$120,000.00) PLUS INTEREST in full satisfaction of all claims for civil penalties for the violations alleged in Section C of this CAFO. Subject to the payment schedule set forth below, such civil penalty amount shall become due and payable immediately upon Respondent Aero-Electric's receipt of a true and correct copy of this CAFO. Respondent Aero-Electric must pay the civil penalty in accordance with the following schedule:

<i>Deadline to Submit Payment</i>	<i>Amount of Payment</i>
No later than THREE MONTHS after the effective date of this CAFO	\$15,682.84
No later than SIX MONTHS after the effective date of this CAFO	\$15,682.84
No later than NINE MONTHS after the effective date of this CAFO	\$15,682.84
No later than TWELVE MONTHS after the effective date of this CAFO	\$15,682.84
No later than FIFTEEN MONTHS after the effective date of this CAFO	\$15,682.84
No later than EIGHTEEN MONTHS after the effective date of this CAFO	\$15,682.84
No later than TWENTY-ONE MONTHS after the effective date of this CAFO	\$15,682.84
No later than TWENTY-FOUR MONTHS after the effective date of this CAFO	\$15,682.84

43. The aforesaid settlement amount was based upon EPA's consideration of the statutory factors of the seriousness of Aero-Electric's violations and any good faith efforts by Aero-Electric to comply with all applicable requirements as provided in RCRA Section 3008(a)(3), 42 U.S.C. § 6928(a)(3), and in accordance with the applicable provisions of the "June 2003 RCRA Civil Penalty Policy." Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), as adjusted by the Debt Collection Improvement Act of 1996, *see* 61 Fed. Reg. 69360 (Dec. 31, 1996) and 69 Fed. Reg. 7121 (Feb. 13, 2004), authorizes a civil penalty of up to TWENTY-SEVEN THOUSAND, FIVE HUNDRED DOLLARS (\$27,500) per day for violations of Subtitle C of RCRA, 42 U.S.C. § 6921 *et seq.*, occurring on or after January 31, 1997 but before March 16, 2004, and a civil penalty of up to THIRTY-TWO THOUSAND, FIVE HUNDRED DOLLARS (\$32,500) per day for violations of Subtitle C of RCRA, 42 U.S.C. § 6921 *et seq.*, occurring after March 15, 2004.

E. ADMISSIONS AND WAIVERS OF RIGHTS

44. Respondent Aero-Electric admits and agrees that the EPA Administrator and Region IX Administrator have jurisdiction and authority over the subject matter of the action commenced in this CAFO and over Aero-Electric pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, and 40 CFR §§ 22.4 and 22.37. Further, for the purposes of this proceeding, Aero-Electric admits to the jurisdictional allegations of facts and law set forth in Section B of this CAFO. Aero-Electric consents to and agrees not to contest EPA's jurisdiction and authority to enter into and issue this CAFO and to enforce its terms. Further, Aero-Electric will not contest EPA's jurisdiction and authority to compel compliance with this CAFO in any enforcement proceedings, either administrative or judicial, or to impose sanctions for violations of this CAFO.
45. Respondent Aero-Electric neither admits nor denies any allegations of fact or law set forth in Section C of this CAFO. Aero-Electric hereby waives any rights it may have to contest the allegations set forth in this CAFO, waives any rights it may have to a hearing on any issue relating to the factual allegations or legal conclusions set forth in this CAFO, including without limitation a hearing pursuant to Section 3008(b) of RCRA, 42 U.S.C. § 6928(b) and hereby consents to the

issuance of this CAFO without adjudication. In addition, Respondent Aero-Electric hereby waives any rights it may have to appeal the Final Order attached to this Consent Agreement and made part of this CAFO.

F. PARTIES BOUND

46. This CAFO shall apply to and be binding upon Respondent Aero-Electric and its agents, successors and assigns and upon all persons acting under or for Respondent Aero-Electric, until such time as the civil penalty required under Section G has been paid. At such time as those matters are concluded, this CAFO shall terminate and constitute full settlement of the violations alleged herein.
47. No change in ownership or any other legal status relating to the Facility will in any way alter Aero-Electric's obligations and responsibilities under this CAFO.
48. Respondent Aero-Electric shall give prior notice of this CAFO to any successor in interest prior to transfer of ownership or operation of the Facility and shall notify EPA within seven (7) days prior to such transfer until the termination of this CAFO.
49. The undersigned representative of Aero-Electric hereby certifies he or she is fully authorized to enter into this CAFO, to execute and to legally bind Respondent Aero-Electric to it.

G. PAYMENT OF CIVIL PENALTY

50. Respondent Aero-Electric consents to the assessment of and agrees to pay a civil penalty of ONE HUNDRED AND TWENTY THOUSAND DOLLARS (\$120,000.00) PLUS INTEREST in full settlement of the federal civil penalty claims set forth in this CAFO.
51. Respondent shall submit payment of the ONE HUNDRED AND TWENTY THOUSAND DOLLAR (\$120,000.00) PLUS INTEREST civil penalty in accordance with the schedule set forth in Section D. Unless EPA directs payments pursuant to this CAFO to a different address, each payment shall be made in accordance with one of the options set forth below:

- a. A check sent by regular U.S. Postal Service mail should be made payable to the “Treasurer, United States of America” and addressed to:

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

- b. Wire transfers should be directed to the Federal Reserve Bank of New York as follows –

Federal Reserve Bank of New York
ABA = 021030004
Account = 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York NY 10045
Field Tag 4200 of the Fedwire message should read “D
68010727 Environmental Protection Agency”

- c. A check sent by overnight mail should be payable to the “Treasurer, United States of America” and addressed to:

U.S. Bank
1005 Convention Plaza
Mail Station SL-MO-C2GL
St. Louis, MO 63101

Contact: Natalie Pearson, 314-418-4087

- d. If using ACH (also known as REX or remittance express):

Automated Clearinghouse (“ACH”) for receiving US currency
PNC Bank

808 17th Street, NW
Washington, DC 20074
Contact – Jesse White 301-887-6548
ABA = 051036706
Transaction Code 22 – checking
Environmental Protection Agency
Account 310006
CTX Format

e. An On Line Payment Option is available through the Dept. of Treasury. This payment option can be accessed from the information below:

WWW.PAY.GOV
Enter sfo 1.1 in the search field

Open form and complete required fields.

52. At the time payment in accordance with the foregoing paragraph is made, a copy of the check or other form of payment or evidence thereof shall be sent to each of the following Region IX addresses:

Danielle Carr
Regional Hearing Clerk (ORC-1)
U.S. Environmental Protection Agency - Region IX
75 Hawthorne Street
San Francisco, CA 94105

and

Loren Henning (WST-3)
Waste Management Division
U.S. Environmental Protection Agency - Region IX
75 Hawthorne Street
San Francisco, CA 94105

53. All payments shall indicate the name of the Facility, EPA identification number of the Facility, the Respondent's name and address, and the EPA docket number of this action.

54. In accordance with the Debt Collection Act of 1982 and U.S. Treasury directive (TFRM 6-8000), the payment must be received in accordance with the schedule set forth in Section D of this CA/FO to avoid additional charges. If payment is not received by each deadline specified in the schedule in Section D of this CAFO, additional interest will accrue on the principal amount due from the appropriate deadline set forth in the schedule at the current rate published by the United States Treasury as described at 40 C.F.R. §13.11. A late penalty charge of \$15.00 will be imposed after thirty (30) calendar days with an additional \$15.00 charge for each subsequent thirty (30) day period. A 6% per annum penalty will further apply on any principal amount not paid within ninety (90) calendar days of the deadline set forth in the schedule in Section D of this CAFO. Respondent will also be liable for stipulated penalties as set forth below for any payment not received by its deadline.

H. DELAY IN PERFORMANCE/STIPULATED PENALTIES

55. In the event Respondent AERO-ELECTRIC fails to submit a payment to EPA by the time required in this CAFO, Respondent shall pay stipulated penalties up to FIVE HUNDRED DOLLARS (\$500.00) per day for the first to fifteenth day of delay, up to ONE THOUSAND DOLLARS (\$1,000.00) per day for the sixteenth to thirtieth day of delay, and up to FIFTEEN HUNDRED DOLLARS (\$1,500.00) per day for each day of delay thereafter.
56. All penalties shall begin to accrue on the date that performance is due or a violation occurs, and shall continue to accrue through the final day of correction of the noncompliance or completion of the activity. Nothing herein shall prevent the simultaneous accrual of separate penalties for separate violations.
57. All penalties owed to EPA under this Section shall be due within thirty (30) days of receipt of a written demand by EPA for such penalties. Such demand shall describe the noncompliance and shall indicate the amount of penalties due. Interest at the current rate published by the United States Treasury, as described at 40 C.F.R. §13.11, shall begin to accrue on the unpaid balance at the end of the thirty (30) day period. Unless EPA directs payments pursuant to this CAFO to a different address, any stipulated penalty payment shall be

made in accordance with one of the options set forth above under paragraph 51.

58. At the time payment in accordance with the foregoing paragraph is made, a copy of the check or other form of payment or evidence thereof shall be sent to each of the following Region IX addresses:

Danielle Carr
Regional Hearing Clerk (ORC-1)
U.S. Environmental Protection Agency - Region IX
75 Hawthorne Street
San Francisco, CA 94105

and

Loren Henning (WST-3)
Waste Management Division
U.S. Environmental Protection Agency - Region IX
75 Hawthorne Street
San Francisco, CA 94105

59. All payments shall indicate the name of the Facility, EPA identification number of the Facility, Respondent Aero-Electric's name and address, and the EPA docket number of this action.
60. The payment of stipulated penalties shall not alter in any way Respondent Aero-Electric's obligation to complete the performance required hereunder.
61. The stipulated penalties set forth in this Section do not preclude EPA from pursuing any other remedies or sanctions which may be available to EPA by reason of Respondent Aero-Electric's failure to comply with any of the requirements of this CAFO.

I. RESERVATION OF RIGHTS

62. EPA expressly reserves all rights and defenses that it may have.
63. EPA hereby reserves all of its statutory and regulatory powers, authorities, rights and remedies, both legal and equitable, including

the right to require that Respondent Aero-Electric perform tasks in addition to those required by this CAFO. EPA further reserves all of its statutory and regulatory powers, authorities, rights and remedies, both legal and equitable, which may pertain to Respondent Aero-Electric's failure to comply with any of the requirements of this CAFO, including without limitation, the assessment of penalties under Section 3008(c) of RCRA, 42 U.S.C. §6928(c). This CAFO shall not be construed as a covenant not to sue, release, waiver or limitation of any rights, remedies, powers or authorities, civil or criminal, which EPA has under RCRA, the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA"), or any other statutory, regulatory or common law enforcement authority of the United States.

64. Compliance by Respondent Aero-Electric with the terms of this CAFO shall not relieve Aero-Electric of its obligations to comply with RCRA or any other applicable local, California, or federal laws and regulations.
65. The entry of this CAFO and Respondent Aero-Electric's consent to comply shall not limit or otherwise preclude EPA from taking additional enforcement actions should EPA determine that such actions are warranted except as it relates to Respondent Aero-Electric's liability for federal civil penalties for the specific alleged violations and facts as set forth in Section C of this CAFO, Counts 1-6, paragraphs 16 through 41.
66. This CAFO is not intended to be nor shall it be construed as a permit. This CAFO does not relieve Respondent Aero-Electric of any obligation to obtain and comply with any local, California, or federal permits.

J. OTHER CLAIMS

67. Nothing in this CAFO shall constitute or be construed as a release from any other claim, cause of action or demand in law or equity by or against any person, firm, partnership, entity or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous constituents, hazardous substances,

hazardous wastes, pollutants, or contaminants found at, taken to, or taken from the Facility.

K. MISCELLANEOUS

- 68. By signing this CAFO, Respondent Aero-Electric without admitting or denying them, certifies that all of the alleged violations set forth in Section C of this CAFO, which are or were capable of correction, have been corrected.
- 69. This CAFO may be amended or modified only by written agreement executed by both EPA and Respondent.
- 70. The headings in this CAFO are for convenience of reference only and shall not affect interpretation of this CAFO.
- 71. The Effective Date of this CAFO is the date the CAFO, once signed by the Regional Judicial Officer, is filed with the Regional Hearing Clerk.

IT IS SO AGREED.

4/14/2008
Date

Mark Wilkinson
~~Alan Trombly~~, President Mark Wilkinson
For Respondent Aero-Electric Connector, Inc.

6/18/08
Date

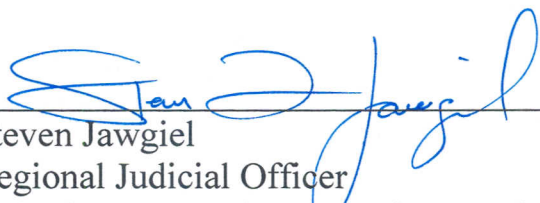
Jeff Scott Nancy Lindsay, Acting Director
Waste Management Division
U.S. Environmental Protection Agency,
Region IX

FINAL ORDER

IT IS HEREBY ORDERED that this Consent Agreement and Final Order (U.S. EPA Docket No. RCRA 09-2008-042) be entered and that Respondent AERO-ELECTRIC CONNECTOR, INC., ("Respondent") pay a civil penalty of ONE-HUNDRED AND TWENTY-THOUSAND DOLLARS (\$120,000.00) PLUS INTEREST by checks payable to "Treasurer of the United States," within the time frames and in the amounts set forth in the schedule in Section D of this Consent Agreement and Final Order. A notice of each payment and a copy of each check or other form of payment or evidence thereof shall be sent to the EPA Region IX addresses specified in Section G of this Consent Agreement and Final Order within each of the specific, applicable time frames set forth in the Schedule in Section D.

This Final Order, once signed, shall be effective immediately upon it being filed with the Regional Hearing Clerk.

06/18/08
Date



Steven Jawgiel
Regional Judicial Officer
United States Environmental Protection Agency,
Region IX

CERTIFICATE OF SERVICE

I hereby certify that on the date below, the original copy of the foregoing Complaint, Consent Agreement and Final Order, was filed with the Regional Hearing Clerk, Region IX, and that copies were sent by certified mail, return receipt requested, to:

Mark Wilkinson
President
Conesys/Aero-Electric Connector, Inc.
2280 208th St.,
Torrance, CA 90501
Certified Return Receipt No. 7000 1670 0009 7278

June 19, 2008
Date

Danielle E Carr
Danielle Carr
Regional Hearing Clerk
U. S. Environmental Protection Agency
Office of Regional Counsel, Region IX