

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

10 MAR 12 AM 8:32
ENVIRONMENTAL PROTECTION
AGENCY-REGION VII
REGIONAL HEARING CLERK

IN THE MATTER OF:)
)
University of Central Missouri)
)
114 W. South Street)
Warrensburg, Missouri 64093)
)
EPA I.D. No. MOD981729205)
)
Respondent.)
)
Proceeding under Sections 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-07-2010-0010

CONSENT AGREEMENT AND FINAL ORDER

The United States Environmental Protection Agency, Region 7 ("EPA" or "Complainant") and the University of Central Missouri ("Respondent" or "UCM") 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), 22.18(b)(2), and 22.18(b)(3) 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), 22.18(b)(2), and 22.18(b)(3).

Section I

Jurisdiction

1. 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") 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.

2. This Consent Agreement and Final Order ("CAFO") serves as notice that EPA has reason to believe that Respondent violated Section 3005 of RCRA, 42 U.S.C. § 6925, and the regulations found at 40 C.F.R. Part 262, as incorporated at 10 C.S.R. 25-5.262(1), and 40 C.F.R. Part 273 as incorporated by 10 C.S.R. 25-16.273(1).

Section II

Parties

3. The Complainant is the Chief of the RCRA Enforcement and State Programs Branch in the Air and Waste Management Division of EPA, Region 7, pursuant to the following delegations by the Administrator of EPA: Delegation No. 8-9-A, dated May 11, 1994; Delegation No. R7-8-9-A, dated June 14, 2005; and Delegation No. R7-Div-8-9-A, dated June 15, 2005.

4. The Respondent is University of Central Missouri, an accredited public university in Warrensburg, Missouri.

Statutory and Regulatory Framework

5. The State of Missouri ("Missouri") has been granted authorization to administer and enforce a hazardous waste program pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926. Missouri has adopted by reference the federal regulations cited herein at pertinent parts of Title 10, Division 25 of the Missouri Code of State Regulations (hereinafter "10 C.S.R. 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 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.

6. When a RCRA violation occurs in a state that is authorized to implement a hazardous waste program pursuant to Section 3006, 42 U.S.C. § 6926, EPA shall give notice to the state in which such violation has occurred or is occurring prior to issuing an order. Missouri has been notified of this action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

7. 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,

through 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.

General Factual Allegations

8. Respondent is a public accredited liberal arts university in the state of Missouri and is a "person" as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

9. Respondent is located at 114 West South Street, Warrensburg, Missouri. Respondent was founded in 1871 and currently employs approximately 1,500 faculty and staff.

10. As part of its operations, Respondent generates waste, including lab packs from Chemistry and Biology laboratories, waste silver from Photography laboratories, and waste oil and fuels from Aviation and Automotive shops. Respondent also generates universal wastes, including spent fluorescent lamps and spent lead-acid batteries. These wastes are managed at UCM's Hazardous Materials Management Facility, located at 114 West South Street.

11. 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 incorporates by reference the regulations at 40 C.F.R. Part 261. Each of the wastes listed in Paragraph 10 is a "solid waste" and all of the wastes except the used oil and universal waste are also "hazardous wastes" within the meaning of these regulations.

12. Respondent filed a notification of hazardous waste activity on October 25, 2006, stating that UCM was a "Large Quantity Generator" of hazardous waste in Missouri pursuant to 40 C.F.R. § 262.34, incorporated by reference at 10 C.S.R. 25-5.262(1).

13. Respondent has been assigned a facility identification number of MOD981729205.

14. On or about October 28-29, 2008, an EPA representative conducted a RCRA Compliance Evaluation Inspection at UCM's facility (hereinafter "the October 2008 inspection"). Based on a review of the inspection report and the information provided during the inspection by facility personnel, it was determined that Respondent was operating, at the time of inspection, as a Large Quantity Generator of hazardous waste, a Small Quantity Handler of universal waste, and a Generator of used oil.

Violations

15. Complainant hereby states and alleges that Respondent has violated RCRA and federal and state regulations promulgated thereunder, as follows:

Count 1

Failure to Conduct Hazardous Waste Determinations

16. The allegations stated in Paragraphs 8 through 14 are realleged and incorporated as if fully set forth herein.

17. 10 C.S.R. 25-5.262(1), incorporating by reference 40 C.F.R. § 262.11, requires a generator of solid waste, as defined in 40 C.F.R. § 260.10, to determine if a solid waste is a hazardous waste using methods prescribed in the regulations.

18. At the time of the October 2008 inspection, Respondent was generating multiple solid waste streams in the Hazardous Material Management Facility, including 34 containers that bore the following labels: "isoproponal, ethanol, acetone, dimethyl carbonate"; "acetone, 95% ethanol"; "CHCl₃, nicotinamide, methanol, NaOH"; "acetone, d-chloroform, unknown aromatic"; "CHCl₃, CH₃OH, nicotinamide, NaOH"; "Mg³⁺⁺, K⁺, Pb²⁺, Zn²⁺, NaOH"; "Sulfamic acid"; "EDTA"; "Galactose"; "P-Hydroxybenzoic acid"; "methylene chloride/caffeine"; and "Mystery Powder."

19. At the time of the October 2008 inspection, Respondent had not conducted hazardous waste determinations on any of the containers listed in Paragraph 18.

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

Count 2

Operating as a Treatment, Storage or Disposal Facility Without a RCRA Permit or RCRA Interim Status

21. The allegations stated in Paragraphs 8 through 20 are realleged and incorporated as if fully set forth herein.

22. Section 3005 of RCRA, 42 U.S.C. § 6925, and 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 III of RCRA to have a permit for such activities.

23. 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 90 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 regulatory requirements.

24. Respondent failed to comply with various hazardous waste regulatory requirements, described below.

25. Respondent does not have a RCRA Permit or Interim Status to operate as a storage facility and is therefore in violation of Section 3005 of RCRA, 42 U.S.C. § 6925, and 10 C.S.R. 25-7.270.

Failure to Comply with Generator Requirements

26. At the time of the October 2008 inspection, Respondent was not complying with the following regulatory requirements:

Satellite Accumulation Container Stored for Longer Than One Year

27. Pursuant to 10 C.S.R. 25-5.262(1), incorporating by reference 40 C.F.R. § 262.34(c)(1)(ii) as amended by 10 C.S.R. 25-5.262(2)(C)3, a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation (“satellite storage” or “satellite accumulation”) without a permit or interim status provided that it takes several actions listed in the regulations. Specifically, within one year from the date satellite storage begins, the waste must be transferred to the area where hazardous waste is stored.

28. The EPA inspector found a 1-liter container labeled as “isoproponal, ethanol, acetone, dimethyl carbonate” and dated “5/16/05” in the satellite storage area during the October 2008 inspection.

29. Respondent’s failure to move hazardous waste from the satellite storage area to the hazardous waste storage area within one year is a violation of 10 C.S.R. 25-5.262(1), incorporating by reference 40 C.F.R. § 262.34(c)(1)(ii) as amended by 10 C.S.R. 25-262(2)(C)3.

Failure to Include Start Date on a Satellite Accumulation Container

30. The regulations at 10 C.S.R. 25-5.262(1), incorporating by reference 40 C.F.R. § 262.34(a)(2), require that the date upon which each period of satellite accumulation begins is clearly marked and visible for inspection on each container.

31. During the October 2008 inspection, a 2-liter container labeled as “acetone, chloroform, methanol, and 2,4 Pyridine” located in the satellite accumulation area in Room 419 in the W.C. Morris Building was not marked with a satellite accumulation start date.

32. Respondent’s failure to adequately label the 2-liter container at the satellite storage location with a start date is a violation of 40 C.F.R. § 262.34(a)(2), incorporated by reference at 10 C.S.R. 25-5.262(1).

Failure to Conduct Weekly Inspections

33. The regulations in 10 C.S.R. 25-5.262(2)(C)2.C(I) and (II), which incorporate by reference 40 C.F.R. § 265.174, require that generators of hazardous waste inspect their facility for malfunction, deterioration, or both, as well as for operator error and evidence of discharges that could cause the release of hazardous waste constituents to the environment or could pose a threat to human health. At a minimum, inspections must comply with the requirements of 40 C.F.R § 265.174, which mandates at least weekly inspections of hazardous waste container storage areas.

34. There is no record of Respondent performing a weekly inspection of its hazardous waste container storage area from March 26, 2007, until April 2, 2007.

35. Respondent’s failure to conduct an inspection at least once weekly during the above-referenced period is a violation of 40 C.F.R. § 265.174, incorporated by reference at 10 C.S.R. 25-5.262(2)(C)2.C(I) and (II).

Failure to Ensure Employees Are Properly Trained

36. 10 C.S.R. 25-5.262(1), incorporating by reference 40 C.F.R. § 262.34(d)(5)(iii), requires the generator to ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures.

37. At the time of the October 2008 inspection, the facility had no formal hazardous waste training for student employees working in the Hazardous Materials Management Area, despite the fact that the student employees regularly handled waste (e.g., signing weekly

inspection logs for the hazardous waste storage area). Numerous unlabeled and undated containers were also present.

38. The lack of formal training and the abundance of unlabeled and undated containers indicate that UCM failed to train employees sufficiently to familiarize them with the required waste handling procedures, thus violating 40 C.F.R. § 262.34(d)(5)(iii), incorporated by reference at 10 C.S.R. 25-5.262(1).

Failure to Document Employee Training

39. The regulations at 10 C.S.R. 25-5.262(1) incorporate by reference 40 C.F.R. § 262.34(a)(4), which in turn references the requirements for documenting training at 40 C.F.R. § 265.16. Specifically, 40 C.F.R. § 265.16(d)(4) requires the owner or operator to maintain records documenting that requisite training or job experience has been given to, and completed by, facility personnel.

40. During the October 2008 inspection, no documentation was provided for completed training for several student employees whose signatures were on the weekly inspection logs of the hazardous waste storage area.

41. The failure to document training is a violation of 40 C.F.R. § 265.16(d)(4) as referenced by 40 C.F.R. § 262.34(a)(4), which is incorporated by reference at 10 C.S.R. 25-5.262(1).

Failure to Maintain Former Employee Training Documents for at Least Three Years

42. The regulations at 10 C.S.R. 25-5.262(1) incorporate by reference 40 C.F.R. § 262.34(a)(4), which in turn references the requirements for documenting training at 40 C.F.R. § 265.16. Specifically, 40 C.F.R. § 265.16(e) requires that training records on current personnel be kept until closure of the facility, and training records for former employees be kept for at least three years from the date the employee last worked at the facility.

43. Mr. Scott Ammon, UCM's Hazardous Material Coordinator, stated during the October 2008 inspection that employee training records are not maintained on-site for the required three years.

44. The failure to maintain training documentation on-site for the appropriate amount of time is a violation of 40 C.F.R. § 265.16(e) as referenced by 40 C.F.R. § 262.34(a)(4), which is incorporated by reference at 10 C.S.R. 25-5.262(1).

Failure to Label Storage Containers with Words "Hazardous Waste"

45. The regulations at 10 C.S.R. 25-5.262(1), incorporating by reference 40 C.F.R. § 262.34(a)(3), require that while a tank or container is accumulated on-site, it must be labeled or marked clearly with the words "Hazardous Waste."

46. At the time of the October 2008 inspection, the Hazardous Material Management Facility had 19 containers that were not labeled or marked clearly with the words "Hazardous Waste."

47. Respondent's failure to properly label these containers with the words "Hazardous Waste" constitutes a violation of 40 C.F.R. § 262.34(a)(3), incorporated by reference at 10 C.S.R. 25-5.262(1).

Count 3

Failure to Comply with Universal Waste Lamp Requirements

48. The allegations stated in Paragraphs 8 through 47 are realleged and incorporated as if fully set forth herein.

49. 10 C.S.R. 25-16.273(1) incorporates 40 C.F.R. Part 273 by reference. The regulations at Part 273 contain several requirements for handling universal waste lamps:

- i. 40 C.F.R. § 273.14(e) requires that individual lamps or containers in which lamps are contained must be marked clearly with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."
- ii. 40 C.F.R. § 273.15(c) requires small quantity handlers of universal waste to demonstrate the length of time that a particular universal waste has been accumulated, from the date it becomes a waste or is received.
- iii. 40 C.F.R. § 273.13(d)(1) requires that lamps must be contained in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. These containers must remain closed and must lack evidence of leakage, spillage, or damage.

50. During the October 2008 inspection, more than one hundred spent fluorescent lamps were stored in approximately ten containers in two separate storage areas of the General Services Building. These containers were neither closed nor adequately handled to prevent

breakage. The containers were not dated or properly labeled as "Universal Waste-Lamp(s)," "Waste Lamp(s)" or "Used Lamp(s)."

51. Respondent's failure to properly label, date, and close the lamp storage containers is a violation of 40 C.F.R. §§ 273.14(e), 273.15(c), and 273.13(d)(1), as incorporated by reference at 10 C.S.R. 25-16.273(1).

CONSENT AGREEMENT

1. Respondent and EPA agree to the terms of this CAFO and Respondent agrees to comply with the terms of the Final Order portion of this CAFO. The terms of this CAFO shall not be modified except by a subsequent written agreement between the parties.

2. Respondent admits the jurisdictional allegations of this CAFO and agrees not to contest EPA's jurisdiction in this proceeding or any subsequent proceeding to enforce the terms of the Final Order portion of this CAFO set forth below.

3. Respondent neither admits nor denies the factual allegations and legal conclusions set forth in this CAFO, but agrees to settle all claims alleged by Complainant under the terms set forth herein without further cost or delay.

4. Respondent waives its right to a judicial or administrative hearing on any issue of fact or law set forth above, and its right to appeal the proposed Final Order portion of the CAFO.

5. Respondent and Complainant agree to conciliate the matters set forth in this CAFO without the necessity of a formal hearing and to bear their respective costs and attorneys' fees.

6. This CAFO addresses all civil administrative claims for the RCRA violations identified above. Complainant reserves the right to take any enforcement action with respect to any other violations of RCRA and its implementing regulations or any other applicable law.

7. Nothing contained in the Final Order portion of this CAFO shall alter or otherwise affect Respondent's obligation to comply with all applicable federal, state, and local environmental statutes and regulations and applicable permits.

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

9. 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.

10. This CAFO shall be effective upon entry of the Final Order by the Regional Judicial Officer for EPA, Region 7. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

11. Respondent certifies by the signing of this CAFO that, to the best of Respondent's knowledge, it is presently in compliance with all requirements of Subchapter III of RCRA (Hazardous Waste Management).

12. Respondent agrees that, in settlement of the claims alleged in this CAFO, Respondent shall pay a penalty of Fourteen Thousand, Nine Hundred and Eighty-Eight Dollars and No Cents (\$14,988.00) as set forth in Paragraph 1 of the Final Order.

13. The effect of the settlement described in Paragraph 6 above is conditioned upon the accuracy of the Respondent's representations to EPA, memorialized in Paragraph 11 above.

14. This CAFO shall remain in full force and effect until Complainant provides Respondent with written notice, in accordance with Paragraph 7 of the Final Order portion of the CAFO, that all requirements hereunder have been satisfied.

Reservation of Rights

15. Notwithstanding any other provision of this CAFO, EPA reserves the right to enforce the terms of the Final Order portion of this CAFO 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 not to exceed Thirty-seven Thousand Five Hundred Dollars (\$37,500) per day per violation pursuant to Section 3008(c) and/or Section 3008(g) of RCRA, for each day of non-compliance with the terms of the Final Order, or to seek any other remedy allowed by law.

16. Complainant reserves the right to take enforcement action against Respondent to enforce the terms and conditions of this CAFO.

17. Except as expressly provided herein, nothing in this CAFO shall constitute or be construed as a release from any claim (civil or criminal), 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 Respondent's facility.

18. Notwithstanding any other provisions of the CAFO, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority, should EPA find that the future handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at Respondent's facility may present an imminent and substantial endangerment to human health and the environment.

19. The headings in this CAFO are for convenience of reference only and shall not affect interpretation of this CAFO.

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 CAFO, IT IS HEREBY ORDERED THAT:

A. Payment of Civil Penalty

1. Within thirty (30) days of the effective date of this CAFO, Respondent will pay a civil penalty of \$14,988.00. 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:

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

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"

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

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

and:

Demetra O. Salisbury
U.S. Environmental Protection Agency, Region 7
901 North 5th Street
Kansas City, Kansas 66101.

3. 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, state, or local income tax purposes.

B. Compliance Actions

4. Respondent shall take the following actions within the time periods specified, according to the terms and conditions specified below:
- a. Respondent shall take the following actions within 30 days after the effective date of this CAFO, and on an annual basis thereafter for a period of two years:
 - (1) perform laboratory cleanouts throughout the campus, where "laboratory cleanouts" means evaluating the inventory of chemicals and other materials in a laboratory that are no longer needed or that have expired and the subsequent removal of those chemicals or other unwanted materials from the laboratory.
 - b. Within 30 days of each laboratory cleanout, Respondent shall provide an inventory of the waste collected (and moved to the Hazardous Materials Management Area) during the campus-wide laboratory cleanout.
 - c. Beginning in April 2010 and on a quarterly basis for a period of two years, Respondent shall provide a copy of the manifests for wastes generated during the previous quarter.
 - d. Respondent shall take the following actions within 30 days after each quarter for a period of one year:
 - (1) provide documentation of proper labeling and dating of 10% hazardous waste containers and 10% of universal waste containers stored or generated during that

quarter;
(2) provide documentation of proper storage of 10% of hazardous waste containers and 10% of universal waste containers (e.g. closed containers that are stored with adequate aisle space), stored or generated during that quarter; and
(3) provide copies of inspections of hazardous waste containers, stored or generated during that quarter.

e. Within 30 days after the effective date of the CAFO, Respondent shall provide the training plan and training materials that meet the requirements of 40 C.F.R. § 264.16, specifically including instruction which teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed.

f. Within 30 days after the effective date of the CAFO, Respondent shall provide a revised Environmental Management Plan, incorporating the revised training requirements and universal waste information. Within 30 days after a new Environmental and Hazardous Materials Coordinator is employed, Respondent shall provide the revised Environmental Management Plan.

For the purposes of paragraph 4, “quarters” are defined as January – March, April – June, July – September, and October – December.

5. All documents required to be submitted by this CAFO shall be sent to the attention of:

Nicole Cruise
Environmental Scientist
U.S. Environmental Protection Agency, Region 7
AWMD/RESP
901 North 5th Street
Kansas City, Kansas 66101.

6. The provisions of this CAFO shall be deemed satisfied upon a written determination by Complainant that Respondent has fully implemented the actions required in the Final Order.

Parties Bound

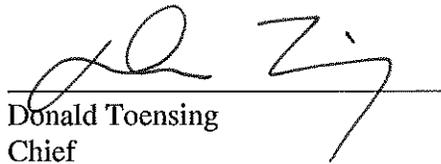
7. The Final Order portion of this CAFO shall apply to and be binding upon Respondent and Respondent’s agents, successors and/or assigns. Respondent shall ensure that all contractors, employees, consultants, firms, or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this CAFO.

FOR COMPLAINANT:

U.S. ENVIRONMENTAL PROTECTION AGENCY- REGION 7

2-24-10

Date

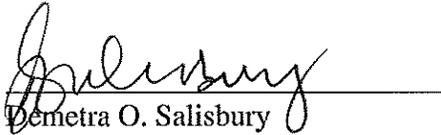


Donald Toensing
Chief

RCRA Enforcement and State Programs Branch
Air and Waste Management Division

3/1/10

Date



Demetra O. Salisbury
Assistant Regional Counsel

FOR RESPONDENT:

UNIVERSITY OF CENTRAL MISSOURI

2/17/10
Date

Signature Betty J. Roberts
Printed Name Betty J. Roberts
Title VP Admin + Finance

Consent Agreement and Final Order
University of Central Missouri
Docket No. RCRA-07-2010-0010
Page 16 of 16

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

March 12, 2010
Date

Robert Patrick
Robert Patrick
Regional Judicial Officer

IN THE MATTER OF University of Central Missouri, Respondent
Docket No. RCRA-07-2010-0010

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:

Demetra O. Salisbury
Assistant Regional Counsel
Region VII
United States Environmental Protection Agency
901 N. 5th Street
Kansas City, Kansas 66101

Copy by Certified Mail Return Receipt to:

University of Central Missouri
Office of the General Counsel
Administration Building 208
Warrensburg, Missouri 64093
Attn: Henry R. Setser

Dated: 3/12/10



Kathy Robinson
Hearing Clerk, Region 7