

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
BEFORE THE ADMINISTRATOR

FILED

Sep 29, 2025

2:04 pm

**U.S. EPA REGION 3
HEARING CLERK**

In the Matter of:

Strittmatter Materials, LLC
1906 Towne Center Blvd
Annapolis, MD 21401,

Respondent.

3334 Kenilworth Avenue
Hyattsville, MD 20781

Facility

Administrative Compliance Order on Consent

Docket No. CAA-03-2025-0124DA

ADMINISTRATIVE COMPLIANCE ORDER

A. PRELIMINARY STATEMENT

1. This Administrative Compliance Order (“Order”) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (“EPA”) by Section 113(a) of the Clean Air Act (the “Act”), 42 U.S.C. § 7413(a).
2. On the EPA’s behalf, the Director of the Enforcement and Compliance Assurance Division is delegated the authority to issue this Order under Section 113(a) of the Act, 42 U.S.C. § 7413(a).
3. Respondent is Strittmatter Materials, LLC, a limited liability company registered, and currently doing business under the trade name D.C. Materials, in the state of Maryland. Respondent is a “person” as defined in Section 302(e) of the Act, 42 U.S.C. § 7602(e).
4. Respondent signs this Order on consent.
5. In satisfaction of the notice requirements of Section 113(a) of the Act, 42 U.S.C. § 7413(a), on January 22, 2025, the EPA issued to Respondent a notice of violation (“NOV”) and provided a copy of the NOV to the Maryland Department of the Environment, providing notice to both that the EPA found that Respondent was in violation of the Act and providing Respondent an

opportunity to confer with the EPA. On or about February 4, 2025, representatives of Respondent and the EPA began discussing the January 22, 2025 NOV.

B. STATUTORY AND REGULATORY BACKGROUND

NONMETALLIC MINERAL PROCESSING PLANT NEW SOURCE PERFORMANCE STANDARD

6. Section 111 of the Act, 42 U.S.C. § 7411, requires the Administrator of EPA to publish a list of categories of stationary sources that cause, or contribute significantly to, air pollution which may reasonable be anticipated to endanger public welfare, and to promulgate Federal standards of performance, which may consist of design, equipment, work practice, or operational standards, for new sources within such category (“NSPS”). The Administrator of EPA determined that the Nonmetallic Mineral Processing industry contributes significantly to air pollution which may reasonably be anticipated to endanger public health or welfare. On August 1, 1985, EPA promulgated standards of performance for particulate matter emissions from fixed and portable nonmetallic mineral processing plants, codified at 40 C.F.R Part 60, Subpart OOO (“NMPP NSPS”). 50 Fed. Reg. 31,328 (August 1, 1985). Pursuant to Section 111(e) of the Act, 42 U.S.C. § 7411(e), any owner or operator of any new source must operate such a source in accordance with applicable NSPS.
7. Pursuant to Section 111(c) of the Act, 42 U.S.C. § 7411(c), EPA delegated to the State of Maryland the authority to implement and enforce NSPS on August 23, 1985. 50 Fed. Reg. 34,140 (August 23, 1985). EPA also retained the authority to enforce any NSPS standard whenever such enforcement is deemed by the EPA to be necessary to carry out the purposes of the Act. *Id.* at 34,141.
8. The NMPP NSPS applies to affected facilities for which construction, modification, or reconstruction commenced on or after August 31, 1983, at plants that process any of 18 nonmetallic minerals, including crushed and broken stone, sand and gravel, clay, rock salt, gypsum (natural or synthetic), sodium compounds, pumice, gilsonite, talc and pyrophyllite,

boron, barite, fluorospar, feldspar, diatomite, perlite, vermiculite, mica, and kyanite. EPA amended the NMPP NSPS on June 9, 1997 and on April 28, 2009. See 62 Fed. Reg. 31,351 (June 9, 1997) and 74 Fed. Reg. 19,294 (April 28, 2009), respectively. These amendments included revisions to the emission limits for NMPP NSPS affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008, as well as additional testing and monitoring requirements for such affected facilities.

9. Pursuant to 40 C.F.R. § 60.670, the NMPP NSPS applies to affected facilities in fixed or portable nonmetallic mineral processing plants including “each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station.”
10. Pursuant to 40 C.F.R. § 60.670(d)(1) of the NMPP NSPS, when an existing facility is replaced by a piece of equipment of equal or smaller size, as defined in 40 C.F.R. § 60.671, having the same function as the existing facility, and there is no increase in the amount of emissions, the new facility is exempt from the provisions of 40 C.F.R. §§ 60.672, 60.674, and 60.675, except as provided for in 40 C.F.R. § 60.670(d)(3). Pursuant to the applicable definitions set forth at 40 C.F.R. § 60.671, “Size” means the rated capacity in tons per hour of a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station; the total surface area of the top screen of a screening operation; the width of a conveyor belt; and the rated capacity in tons of a storage bin.
11. Pursuant to 40 C.F.R. § 60.2 and Table 1 of 40 C.F.R. Part 60, Subpart OOO, the applicable definition of the term “construction” under the NMPP NSPS means “fabrication, erection, or installation of an affected facility.”
12. Pursuant to the Standards for Particulate Matter of 40 C.F.R. § 60.672(b), NMPP NSPS affected facilities must meet the fugitive emission limits and compliance requirements set forth in Table 3 of 40 C.F.R. Part 60, Subpart OOO, within 60 days after achieving the maximum production

rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under 40 C.F.R. § 60.11. Such requirements apply to fugitive emissions from affected facilities without capture systems and to fugitive emissions escaping capture systems.

13. Table 3 of the NMPP NSPS provides that: (a) the owner or operator of an affected facility that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008 must meet a 15% opacity fugitive emissions limit for crushers at which a capture system is not used and a 10% opacity fugitive emissions limit from all other fugitive emission sources and must conduct an initial performance test of the affected facility according to 40 C.F.R. §§ 60.11 and § 60.675; and (b) the owner or operator of an affected facility that commenced construction, modification, or reconstruction on or after April 22, 2008 must meet a 12% opacity fugitive emissions limit for crushers at which a capture system is not used and a 7% opacity fugitive emissions limit from all other fugitive emission sources and, in addition to conducting an initial performance test of the affected facility according to 40 C.F.R. § 60.11 and § 60.675, must also perform periodic inspections of its water sprays according to 40 C.F.R. §§ 60.674(b) and 60.676(b). Owners and operators of affected facilities that are without water sprays must thereafter perform a repeat performance test of the affected facility, according to 40 C.F.R. §§ 60.11 and § 60.675 and within 5 years from the previous performance test, for fugitive emissions. Affected facilities controlled by water carryover from upstream water sprays that are inspected according to the requirements in 40 C.F.R. §§ 60.674(b) and 60.676(b) are exempt from this 5-year repeat testing requirement so long as the upstream water sprays are designated at the time of the initial performance test.

MARYLAND STATE IMPLEMENTATION PLAN (SIP) AND STATE OPERATING PERMIT REQUIREMENTS

14. Section 108(a) of the Act, 42 U.S.C. § 7408, requires the Administrator of the EPA to identify and prepare air quality criteria for each air pollutant, emissions of which may endanger public health or welfare, and the presence of which results from numerous or diverse mobile or stationary

sources (criteria pollutants). For each criteria pollutant, Section 109 of the Act, 42 U.S.C. § 7409, requires the EPA to promulgate National Ambient Air Quality Standards (“NAAQS”) requisite to protect the public health and welfare. Section 110(a) of the Act, 42 U.S.C. § 7410, requires each state to adopt and submit to the Administrator of EPA for approval a plan which provides for implementation, maintenance, and enforcement, for each promulgated NAAQS, in each air quality control region (or portion thereof) within the State Implementation Plan (“SIP”). Section 110(a)(2)(A) of the Act, 42 U.S.C. § 7410(a)(2)(A), provides that each SIP must include enforceable emission limitations, among other control measures, and regulate the modification and construction of any stationary source within the areas covered by the plan as necessary to assure that NAAQS are attained and maintained.

15. The Maryland State Implementation Plan (“MD SIP”) is codified at Title 26 of the Code of Maryland Regulations (“COMAR”), Subtitle 11 on Air Quality. At all times relevant herein, COMAR 26.11.01.01(23) of the MD SIP has defined a New Source Performance Standard source (“NSPS source”) as any source which is subject to 40 C.F.R. Part 60, as amended.
16. The MD SIP, at COMAR 26.11.02.02B(1), provides that “[a] permit to construct and an approval from the [Maryland Department of the Environment] is required before construction or modification of a source, except as specified in Regulation .10 of this chapter.” 68 Fed. Reg. 9012 (February 27, 2003). The MD SIP, at COMAR 26.11.02.09A(3) and COMAR 26.11.02.13A(16), further provides that each NSPS source is subject to the construction permit requirements of COMAR 26.11.02.09 and (with the exception of a source that is covered by a Part 70 permit) that a person may not operate or cause to be operated any crushers, hammermills, shredders, grinders, classifying screens of 5 tons (4540 kilograms) or more per hour throughput without first obtaining, and having in current effect, a required State permit to operate. 80 Fed. Reg. 38404 (July 6, 2015) and 68 FR 9012 (February 27, 2003).

C. FINDINGS

17. Respondent is a limited liability company registered and currently doing business in the State of Maryland, and a “person” as defined in Section 302(e) of the Act, 42 U.S.C. § 7602(e).
18. Beginning February 4, 2023, Respondent, conducting business under the trade name D.C. Materials, has owned and has been operating electric powered crushing and screening plant, equipped with wet suppression systems to control fugitive dust, and consisting of various equipment including a primary Lippman jaw crusher and a secondary Metso impact crusher, capable of operating with a throughput of 250 ton per hour (“TPH”) located at 3334 Kenilworth Avenue in Hyattsville, Maryland (“Facility”).
19. Though the two crushers as well as some of its belt conveyors are equipped with water sprays, the Facility’s wet suppression system does not include water sprays at other belt conveyors and screening operations (i.e., affected facilities) that were constructed at different times but as early as 2011.
20. In February 2015, the Facility’s previous owner sought to replace an existing Hazemag secondary impact crusher with a rated capacity of 100 TPH with a secondary Metso NP1213 impact crusher with a rated capacity of 250 TPH.
21. Based on information and representations submitted by the Facility’s previous owner, the Maryland Department of the Environment (“MDE”) has been permitting the installation of the 250 TPH Metso NP1213 crusher as if it is of equal or smaller size to the 100 TPH Hazemag crusher it replaced (i.e., an “in-kind” replacement), with provisions implementing the NMPP NSPS opacity limits and other requirements for affected facilities constructed, modified, or reconstructed after August 31, 1983 but before April 22, 2008. *See* March 10, 2015 Permit to Construct (Permit No. 033-0666-6-0159), June 23, 2015 Operating Permit (Permit No. 033-0666), and May 1, 2020 Operating Permit (Permit No. 033-0666).

22. Even though it had the same function and has been represented to not have increased emissions, the installation of the Metso NP1213 crusher by the Facility's previous owner to replace the 100 TPH Hazemag crusher does not qualify for the 40 C.F.R. § 60.670(d)(1) NMPP NSPS exemption from the provisions of 40 C.F.R. §§ 60.672, 60.674, and 60.675, since the Metso NP1213 impact crusher had an increased rated capacity of 250 TPH and was not "equipment of equal or smaller size".
23. The installation of the Metso NP1213 impact crusher by the Facility's previous owner in 2015 to replace the existing 100 TPH Hazemag secondary impact crusher was a "construction" of an affected facility that commenced on or after April 22, 2008 for purposes of applicability of the NMPP NSPS, subjecting the Facility to the more stringent opacity fugitive emissions limits and other requirements of the NMPP NSPS for affected facilities constructed, modified, or reconstructed after April 22, 2008.
24. On May 25, 2023, Respondent conducted Method 9 visible observations at the Facility to demonstrate compliance with the opacity fugitive emissions limits of the NMPP NSPS. According to the corresponding June 2023 test report, opacity readings of 0% were observed at each of the 17 observation points (e.g., crushers, feeders, screens, and belt conveyors), well below NMPP NSPS opacity limits applicable to affected facilities constructed, modified, or reconstructed either before *or after* April 22, 2008. Though the June 2023 test report indicated that a water spray system was operating during the duration of the test, it did not designate any upstream water sprays that were being relied on to control emissions at downstream screening operations and belt conveyors not equipped with water sprays.

D. VIOLATIONS

25. Based on the conduct of the Facility's previous owner, described above in connection with the 2015 installation of the 250 TPH Metso NP1213 to replace the 100 TPH Hazemag crusher, Respondent's State construction and/or operating permits do not reflect appropriate NMPP NSPS requirements in violation of COMAR 26.11.02.02B(1) and COMAR 26.11.02.09A(3) of the

MD SIP and, pursuant to 40 C.F.R. § 52.23 and Section 113(a) of the Act, 42 U.S.C. § 7413(a), subject Respondent to enforcement action.

E. ORDER

26. To address the compliance issues described above, which originated prior to Respondent's ownership of the Facility, Respondent is ordered to conduct either the compliance program described in Paragraph 27 (Compliance Program Option 1) or the compliance program described in Paragraph 28 (Compliance Program Option 2).
27. Compliance Program Option 1.
 - a. Respondent shall immediately ensure that each of the affected facilities (as defined in 40 C.F.R. §§ 60.670 and 60.671) at the Facility, including but not limited to each crusher, screening operation, and belt conveyor, meets the fugitive emission limits and compliance requirements set forth in Table 3 of the NMPP NSPS that are applicable to affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008; and
 - b. Respondent shall, within sixty (60) calendar days of the effective date of this Order, and in accordance with the requirements of COMAR 26.11.02.02B(1), COMAR 26.11.02.09A(3) and COMAR 26.11.02.13A(16), submit appropriate application(s) to the MDE (for review, comment and approval) and to the EPA (for the Agency's information) to incorporate as enforceable requirements the fugitive emission limits and compliance requirements set forth in Table 3 of the NMPP NSPS that are applicable to affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008 into the Facility's SIP approved construction and/or operating permits. These

requirements shall include repeat performance testing on or before May 25, 2028 for the screening operations and belt conveyors (i.e., affected facilities) without water sprays in accordance with 40 C.F.R. §§ 60.11 and § 60.675.

28. Compliance Program Option 2

- a. Respondent shall immediately ensure that each of the affected facilities (as defined in 40 C.F.R. §§ 60.670 and 60.671) at the Facility, including but not limited to each crusher, screening operation, and belt conveyor, meets the fugitive emission limits and compliance requirements set forth in Table 3 of the NMPP NSPS that are applicable to affected facilities that commence construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008;
- b. In addition to the existing permit provisions implementing the fugitive emission limits and compliance requirements set forth in Table 3 of the NMPP NSPS that are applicable to affected facilities that commence construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008, Respondent shall, within sixty (60) calendar days of the effective date of this Order, and in accordance with the requirements of COMAR 26.11.02.02B(1), COMAR 26.11.02.09A(3) and COMAR 26.11.02.13A(16), submit appropriate application(s) to the MDE (for review, comment and approval) and to EPA (for the Agency's information) to incorporate as enforceable requirements the following provisions into the Facility's SIP approved construction and/or operating permits:

- i. a 100 TPH limit on throughput to the Metso NP1213 secondary impact crusher that is applicable all times the crusher is operating;
- ii. the following daily monitoring and/or recording provisions applicable each day the Metso NP1213 secondary impact crusher operates:
 - A. For each delivery/batch of material fed to the primary Lippman jaw crusher:
 - 1. total volume (in cubic feet), and bulk density/bulk density source information if relying on a bulk density less than 150 pounds per cubic foot (pcf));
 - 2. total mass calculation (in pounds) based on Paragraph 28.b.ii.A.i measurement multiplied by bulk density of 150 pcf (or other applicable and documented bulk density).
 - B. total daily mass throughput at the Facility calculation (in tons) based on Paragraph 28.b.ii.A.ii results, summing masses from all deliveries/batches and multiplying by a factor of 0.0005;
 - C. total hours of operation of the primary Lippman jaw crusher (in hours);
 - D. average hourly throughput at the Facility calculation (in TPH) based on dividing Paragraph 28.b.ii.B result by Paragraph 28.b.ii.C measurement;

- E. total daily mass (in tons) of product piles RC6 and of 2 inch stone produced, to be measured as piles are depleted for sale to customers or for any other reason and at the end of the operating day;
- F. total percentage of mass throughput to the Metso NP1213 secondary impact crusher calculation relative to Facility-wide throughput as follows:
 - 1. total mass of throughput not entering Metso NP1213 secondary impact crusher calculation based on Paragraph 28.b.ii.E (in tons) measurements, summing the mass from the 2-inch stone product pile and 0.75 times the mass of the RC6 product pile;
 - 2. percentage of Facility-wide mass throughput not entering Metso NP1213 secondary impact crusher calculation, based on dividing Paragraph 28.b.ii.F.1 result by Paragraph 28.b.ii.B result;
 - 3. percentage of Facility-wide throughput entering Metso NP1213 secondary impact crusher calculation, subtracting Paragraph 28.b.ii.F.2 result from 100%;
- G. demonstration of compliance with 100 TPH limit on throughput to the Metso NP1213 secondary impact crusher by multiplying Paragraph 28.b.ii.F.3 result by Paragraph 28.b.ii.D result; and

- III. provisions to perform quarterly maintenance inspections of the spray nozzles in the Facility's wet suppression system; to record the date of inspections, the condition of the spray nozzle, and any corrective actions taken; and to maintain records of the maintenance inspections.
- c. Until the provisions in Paragraph 28.b. are incorporated into Facility's SIP approved construction and/or operating permits or until the Termination Date of the Order as set forth in Paragraph 42, whichever is earlier, Respondent shall submit monthly reports to the EPA documenting compliance with the provision of Paragraph 28.b.ii.

E. OTHER TERMS AND CONDITIONS

- 29. Respondent admits the jurisdictional allegations contained in this Order.
- 30. Respondent neither admits nor denies the findings in Section C (Findings) of this Order.

F. GENERAL PROVISIONS

- 31. Any violation of this Order may result in a civil administrative or judicial action for an injunction or civil penalties of up to \$59,114 per day per violation, or both, as provided in Sections 113(b)(2) and 113(d)(1) of the Act, 42 U.S.C. §§ 7413(b)(2) and 7413(d)(1), as well as criminal sanctions as provided in Section 113(c) of the Act, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this Order in an administrative, civil judicial, or criminal action.
- 32. Nothing in this Order shall relieve Respondent of the duty to comply with all applicable provisions of the Act or other federal, state or local laws or statutes, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit.

33. Nothing herein shall be construed to limit the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.
34. The provisions of this Order shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assigns. From the Effective Date of this Order until the Termination Date as set forth in paragraph 42, Respondent must give written notice and a copy of this Order to any successors in interest prior to any transfer of ownership or control of any portion of or interest in the Facility. Simultaneously with such notice, Respondent shall provide written notice of such transfer, assignment, or delegation to the EPA. In the event of any such transfer, assignment, or delegation, Respondent shall not be released from the obligations or liabilities of this Order unless the EPA has provided written approval of the release of said obligations or liabilities.
35. Unless this Order states otherwise, whenever, under the terms of this Order, written notice or other document is required to be given, it shall be directed to the individuals specified at the addresses below unless those individuals or their successors give notice of a change of address to the other party in writing:

For EPA:

Jennifer M. Abramson, Senior Assistant Regional Counsel
Office of Regional Counsel
Abramson.Jennifer@epa.gov

Kris Hall, Air Section Chief
Enforcement & Compliance Assurance Division
Hall.Kristen@epa.gov

For Respondent:

John Strittmatter, Vice President
Stittmatter Materials, LLC
jstrittmatter@strittmattercompanies.com

All notices and submissions shall be considered effective upon receipt.

36. To the extent this Order requires Respondent to submit any information to the EPA, Respondent may assert a business confidentiality claim covering part or all of that information, but only to the extent and only in the manner described in 40 C.F.R. Part 2, Subpart B. The EPA will disclose information submitted under a confidentiality claim only as provided in 40 C.F.R. Part 2, Subpart B. If Respondent does not assert a confidentiality claim, the EPA may make the submitted information available to the public without further notice to Respondent.
37. Each undersigned representative of the Parties certifies that he or she is authorized to enter into the terms and conditions of this Order to execute and bind legally the Parties to this document.
38. For purposes of the identification requirement in Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. § 162(f)(2)(A)(ii), and 26 C.F.R. § 162-21(b)(2), performance of either of the compliance options under Section E (Order) of this Order is restitution, remediation, or required to come into compliance with the law.
39. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, EPA is required to send to the Internal Revenue Service (“IRS”) annually, a completed IRS Form 1098-F (“Fines, Penalties, and Other Amounts”) with respect to any court order or settlement agreement (including administrative settlements), that require a payor to pay an aggregate amount that EPA reasonably believes will be equal to, or in excess of, \$50,000 for the payor’s violation of any law or the investigation or inquiry into the payor’s potential violation of any law, including amounts paid for “restitution or remediation of property” or to come “into compliance with a law.” EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (i.e., a copy of IRS Form 1098-F). Failure to comply with providing IRS Form W-9 or Tax Identification Number (“TIN”), as described below, may subject Respondent to a penalty, per 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1. In order to provide EPA with sufficient information to enable it to fulfill these obligations, EPA herein requires, and Respondent herein agrees, that:

- a. Respondent shall complete an IRS Form W-9 (“Request for Taxpayer Identification Number and Certification”), which is available at <https://www.irs.gov/pub/irs-pdf/fw9.pdf>;
- b. Respondent shall therein certify that its completed IRS Form W-9 includes Respondent’s correct TIN or that Respondent has applied and is waiting for issuance of a TIN;
- c. Respondent shall email its completed Form W-9 to EPA’s Cincinnati Finance Center at henderson.jessica@epa.gov within 30 days after the effective date of this Order, and EPA recommends encrypting IRS Form W-9 email correspondence; and
- d. In the event that Respondent has certified in its completed IRS Form W-9 that it has applied for a TIN and that TIN has not been issued to Respondent within 30 days after the Effective Date, then Respondent, using the same email address identified in the preceding sub-paragraph, shall further:
 - i. notify EPA’s Cincinnati Finance Center of this fact, via email, within 30 days after the 30 days after the effective date of this Order per Paragraph 40; and
 - ii. provide EPA’s Cincinnati Finance Center with Respondent’s TIN, via email, within five (5) days of Respondent’s issuance and receipt of the TIN.

G. EFFECTIVE DATE AND OPPORTUNITY FOR A CONFERENCE

- 40. Pursuant to Section 113(a)(4) of the Act, an Order does not take effect until the person to whom it has been issued has had an opportunity to confer with the EPA concerning the alleged violations. By signing this Order, Respondent acknowledges and agrees that it has been provided an opportunity to confer with the EPA prior to issuance of this Order. Accordingly, this Order will take effect immediately upon signature by the latter of Respondent or the EPA.

H. JUDICIAL REVIEW

- 41. Respondent waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or

law set forth in this Order, including any right of judicial review under Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1).

I. TERMINATION

42. This Order shall terminate on the earlier of the following (the “Termination Date”) at which point Respondent shall operate in compliance with the Act:
- a. One year after the Effective Date of this Order;
 - b. The effective date of any determination by the EPA that Respondent has achieved compliance with all terms of this Order; or
 - c. Immediately upon receipt by Respondent of notice from the EPA finding that an imminent and substantial endangerment to public health, welfare, or the environment has occurred.

In the Matter of:

Strittmatter Materials, LLC
1906 Towne Center Blvd
Annapolis, MD 21401,

Respondent.

3334 Kenilworth Avenue
Hyattsville, MD 20781

Facility

Administrative Compliance Order on Consent

Docket No. CAA-03-2025-0124DA

For United States Environmental Protection Agency, Region 3:

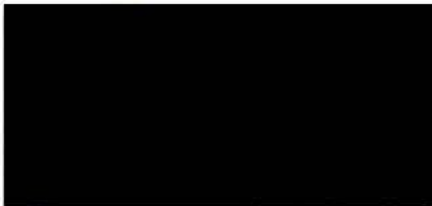
ANDREA
BAIN

Digitally signed by
ANDREA BAIN
Date: 2025.09.29
12:54:34 -04'00'

[digitally signed and dated]

Acting Director
Enforcement & Compliance Assurance Division
U.S. EPA – Region 3

For Respondent:



9/25/25
Date

Printed Name: JOHN STRITTMATTER

Title: VICE PRESIDENT

Address: 3334 KENILWORTH AVENUE, HYATTSVILLE, MD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
BEFORE THE ADMINISTRATOR

In the Matter of:

Strittmatter Materials, LLC
1906 Towne Center Blvd
Annapolis, MD 21401,

Respondent.

3334 Kenilworth Avenue
Hyattsville, MD 20781

Facility

Administrative Compliance Order on Consent

Docket No. CAA-03-2025-0124DA

CERTIFICATE OF SERVICE

I certify that the foregoing Administrative Order on Consent was filed with the EPA Region III Regional Hearing Clerk on the date that has been electronically stamped on the Administrative Order on Consent. I further certify that on the date set forth below, I caused to be served a true and correct copy of the foregoing Administrative Order on Consent to each of the following persons, in the manner specified below, at the following addresses:

Copies served via email to:

Stephen E. Luttrell, Esq.
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
100 Light Street, 19th Floor
Baltimore, MD 21202
sluttrell@bakerdonelson.com

Jennifer M. Abramson, Senior Assistant Regional Counsel
U.S. EPA, Region 3
Abramson.Jennifer@epa.gov

Kris Hall, Air Section Chief
U.S. EPA, Region 3
Hall.Kristen@epa.gov

BEVIN
ESPOSITO

Digitally signed by BEVIN
ESPOSITO
Date: 2025.09.29 14:05:37 -04'00'

[Digital Signature and Date]
Regional Hearing Clerk
U.S. EPA, Region 3