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**U.S. EPA REGION 4
HEARING CLERK**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

In the Matter of:

LANXESS CORPORATION
2151 King Street Extension, Charleston, South
Carolina 29405
EPA ID No.: **SCD003358389**

Respondent.

Docket No.: **RCRA-04-2025-4004(b)**

Proceeding Under Section 3008(a) of the
Resource Conservation and Recovery Act,
42 U.S.C. § 6928(a)

CONSENT AGREEMENT

I. NATURE OF ACTION

1. This is an administrative penalty assessment proceeding brought under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA or the Act), 42 U.S.C. § 6928(a), and Sections 22.13(b) and 22.18 of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (Consolidated Rules), as codified at Title 40 of the Code of Federal Regulations (C.F.R.), Part 22.
2. This Consent Agreement and the attached Final Order shall collectively be referred to as the CAFO.
3. Having found that settlement is consistent with the provisions and objectives of the Act and applicable regulations, the Parties have agreed to settle this action pursuant to 40 C.F.R. § 22.18 and consent to the entry of this CAFO without the Respondent's admission of violation or adjudication of any issues of law or fact herein.

II. PARTIES

4. Complainant is the Director, Enforcement and Compliance Assurance Division, United States Environmental Protection Agency (EPA) Region 4, who has been delegated the authority on behalf of the Administrator of the EPA to enter into this CAFO pursuant to 40 C.F.R. Part 22 and Section 3008(a) of the Act.

5. The Respondent is **LANXESS CORPORATION**, a corporation doing business in the State of South Carolina. This proceeding pertains to the Respondent's facility located at **2151 King Street Extension, Charleston, South Carolina 29405** (Facility).

III. GOVERNING LAW

6. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the State of South Carolina (State) has received final authorization to implement a hazardous waste program in lieu of the federal program set forth in RCRA. The requirements of the authorized State program are found in the South Carolina Hazardous Waste Management Act (SCHWMA), S.C. Code Ann. §§ 44-56-10 *et seq.* [Subtitle C of RCRA, 42 U.S.C. §§ 6921 *et seq.*], the South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273, and 61-79.279 [40 C.F.R. Parts 260 through 270, 273, and 279].
7. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), the requirements established by the Hazardous and Solid Waste Amendments of 1984 (HSWA), Pub. L. 98-616, are immediately effective in all states regardless of their authorization status and are implemented by the EPA until a state is granted final authorization with respect to those requirements. The State has received final authorization for certain portions of HSWA, including those recited herein.
8. Although the EPA has granted the State authority to enforce its own hazardous waste program, the EPA retains jurisdiction and authority to initiate an independent enforcement action pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2). This authority is exercised by the EPA in the manner set forth in the Memorandum of Agreement between the EPA and the State.
9. As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations for the violations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.
10. Pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), Complainant has given notice of this action to the State before issuance of this CAFO.
11. Section 44-56-30 of the SCHWMA [Section 3002(a) of RCRA, 42 U.S.C. § 6922(a)] requires the promulgation of standards applicable to generators of hazardous waste. The implementing regulations for these standards are found at S.C. Code Ann. Regs. 61-79.262 [40 C.F.R. Part 262].
12. Section 44-56-60(a)(2) and (b) of the SCHWMA [Section 3005 of RCRA, 42 U.S.C. § 6925] sets forth the requirement that a facility treating, storing, or disposing of hazardous waste must have a permit or interim status. The implementing regulations for this requirement are found at S.C. Code Ann. Regs. 61-79.264 (permitted) and S.C. Code Ann. Regs. 61-79.265 (interim status) [40 C.F.R. Parts 264 (permitted) and 265 (interim status)].

13. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “generator” is defined as any person, by site, whose act or process produces hazardous waste identified or listed in S.C. Code Ann. Regs. 61-79.261 [40 C.F.R. Part 261], or whose act first causes a hazardous waste to become subject to regulation.
14. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “facility” includes all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste.
15. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “person” includes an individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, or political subdivision of a State.
16. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], an “owner” is “the person who owns a facility or part of a facility” and an “operator” is “the person responsible for the overall operation of a facility.”
17. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “large quantity generator” (LQG) includes a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds (lbs)) of non-acute hazardous waste in a calendar month.
18. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], “storage” means the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.
19. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], “container” means “any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled.”
20. Pursuant to S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], a “solid waste” is any discarded material that is not otherwise excluded from the regulations. A discarded material includes any material that is abandoned by being stored in lieu of being disposed.
21. Pursuant to S.C. Code Ann. Regs. 61-79.261.3 [40 C.F.R. § 261.3], a solid waste is a “hazardous waste” if it meets any of the criteria set forth in S.C. Code Ann. Regs. 61-79.261.3(a)(2) [40 C.F.R. § 261.3(a)(2)] and is not otherwise excluded from regulation as a hazardous waste by S.C. Code Ann. Regs. 61-79.261.4(b) [40 C.F.R. § 261.4(b)].
22. Pursuant to S.C. Code Ann. Regs. 61-79.261.3(a)(2)(i) and 61-79.261.20 [40 C.F.R. §§ 261.3(a)(2)(i) and 261.20], solid wastes that exhibit any of the characteristics identified in S.C. Code Ann. Regs. 61-79.261.21 to 61-79.261.24 [40 C.F.R. §§ 261.21-24] are characteristic hazardous waste and are provided with the EPA Hazardous Waste Numbers D001 through D043.

23. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 61-79.261.21 [40 C.F.R. §§ 261.20 and 261.21], a solid waste that exhibits the characteristic of ignitability is a hazardous waste and is identified with the EPA Hazardous Waste Number D001.
24. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 61-79.261.22 [40 C.F.R. §§ 261.20 and 261.22], a solid waste that exhibits the characteristic of corrosivity is a hazardous waste and is identified with the EPA Hazardous Waste Number D002.
25. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 61-79.261.23 [40 C.F.R. §§ 261.20 and 261.23], a solid waste that exhibits the characteristic of reactivity is a hazardous waste and is identified with the EPA Hazardous Waste Number D003.
26. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 61-79.261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for Arsenic is a hazardous waste and is identified with the EPA Hazardous Waste Number D004.
27. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 61-79.261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for Barium is a hazardous waste and is identified with the EPA Hazardous Waste Number D005.
28. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 61-79.261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for Cadmium is a hazardous waste and is identified with the EPA Hazardous Waste Number D006.
29. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 61-79.261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for Chromium is a hazardous waste and is identified with the EPA Hazardous Waste Number D007.
30. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 61-79.261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for Cresol is a hazardous waste and is identified with the EPA Hazardous Waste Number D026.
31. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 61-79.261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for 1,2-Dichloroethane is a hazardous waste and is identified with the EPA Hazardous Waste Number D028.
32. Pursuant to S.C. Code Ann. Regs. 61-79.261.3(a)(2)(ii) and 61-79.261.30 [40 C.F.R. §§ 261.3(a)(2)(ii) and 261.30], a solid waste is a listed "hazardous waste" if it is listed in S.C. Code Ann. Regs. 61-79.261, Subpart D [40 C.F.R. Part 261, Subpart D].
33. Pursuant to S.C. Code Ann. Regs. 61-79.261.31 [40 C.F.R. § 261.31], the following spent non-halogenated solvents are listed hazardous wastes from a non-specific source and identified by EPA Hazardous Waste Number F002: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those

listed in F001, F004, or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

34. Pursuant to S.C. Code Ann. Regs. 61-79.261.31 [40 C.F.R. § 261.31], the following spent non-halogenated solvents are listed hazardous wastes from a non-specific source and identified by EPA Hazardous Waste Number F003: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, or methanol; a spent solvent mixture/blend containing, before use, only the above spent non-halogenated solvents; or a spent solvent mixture/blend containing, before use, one or more of the above non-halogenated solvents, and, a total of ten percent or more (by volume) of one or more of the solvents identified by EPA Hazardous Waste Numbers F001, F002, F004, or F005; or still bottoms from the recovery of these spent solvents and spent solvent mixtures.
35. Pursuant to the Hazardous Waste Permit Number SCD003368389 (the RCRA Permit), which was issued by the South Carolina Department of Health and Environmental Control (SCDHEC) (now the South Carolina Department of Environmental Services (SCDES)) on September 25, 2014, Condition I.A., the RCRA Permittee shall store hazardous waste and perform corrective action in accordance with the Conditions of the RCRA Permit. Any storage, treatment, and/or disposal of hazardous waste not authorized in the RCRA Permit is prohibited, except as allowed by S.C. Code Ann. Regs. 61-79.260-270, 61-79.273, and 61-79.279.
36. Pursuant to the RCRA Permit, Condition I.B.3, and S.C. Code Ann. Regs. R.61-79.270.51 [40 C.F.R. § 270.51], the Permit and all Conditions of the Permit will remain in effect beyond the permit's expiration date, if the Permittee has submitted a timely, complete renewal application and, through no fault of the Permittee, SCDES has not issued a new permit.
37. Pursuant to the RCRA Permit, Condition I.E.1, the Permittee shall comply with the Approved Permit Application and all Conditions of the Permit.

Satellite Accumulation Area

38. Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or one quart of liquid acute hazardous waste at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the SCHWMA [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with the conditions for exemption in S.C. Code Ann. Regs. 61-79.262.16(b) and 61-79.262.17(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required by S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

39. Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers holding hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Universal Waste

40. Pursuant to S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 273.9)], a small quantity handler of universal waste (SQHUW) means a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.
41. Pursuant to S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each battery or container of batteries clearly with one of the following phrases: "Universal Waste – Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."
42. Pursuant to S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste – Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."
43. Pursuant to S.C. Code Ann. Regs. 61-79.273.15(a) and (c) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Permitted Storage Area

44. Pursuant to the RCRA Permit, Condition IV.D.1, in the event of a leak or a spill from the tank system or secondary containment system, the Permittee shall remove the system from service immediately and stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.
45. Pursuant to the RCRA Permit Condition IV.D.2, in the event of a leak or a spill from the tank system or secondary containment system, the Permittee shall remove the system from service immediately and remove waste from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the system.

Recordkeeping

46. Pursuant to S.C. Code Ann. Regs. 61-79.262.12(b), an authorized State requirement that is more stringent than the federal re-notification requirement found in 40 C.F.R. § 262.18(d)(2), every generator within the State who generates a new hazardous waste shall file with SCDES a revised or new Site Identification Form for that waste within 30 days after such waste is first produced.

47. Pursuant to the RCRA Permit, Condition II.G., the Permittee shall conduct personnel training as required by S.C. Code Ann. Regs. 61-79.264.16 [40 C.F.R. § 264.16]. This training shall follow the outline described in Section H of the Approved Permit Application. The Permittee shall maintain training documents and records at the Facility, as required by S.C. Code Ann. Regs. 61-79.264.16(d) and (e) [40 C.F.R. § 264.16(d) and (e)]. Specifically, S.C. Code Ann. Regs. 61-79.264.16(d) [40 C.F.R. § 264.16(d)] requires the owner or operator to maintain the following documents and records at a facility: (1) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; (2) a written job description for each position listed under paragraph (d)(1) of this section; (3) a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section; and (4) records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.
48. Pursuant to the RCRA Permit, Condition II.E.1, the Permittee's Contingency Plan must cover the requirements of S.C. Code Ann. Regs. 61-79.264.50 through 264.56 [40 C.F.R. §§ 264.50 through 264.56]. Specifically, S.C. Code Ann. Regs. 61-79.264.52(e) and (f) [40 C.F.R. § 264.52(e) and (f)] require the plan to include a list of all emergency equipment at the facility and an evacuation plan for facility personnel.
49. Pursuant to the RCRA Permit, Condition II.E.2, the Permittee shall comply with the requirements of S.C. Code Ann. Regs. 61-79.264.53 [40 C.F.R. § 264.53]. Specifically, S.C. Code Ann. Regs. 61-79.264.53(b) [40 C.F.R. § 264.53(b)] requires the owner or operator to submit a copy of the contingency plan and all revisions to the plan to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.
50. Pursuant to S.C. Code Ann. Regs. 61-79.262.24(a)(3) [40 C.F.R. § 262.24(a)(3)], any requirement for a generator to keep or retain a copy of each manifest is satisfied by retention of a signed electronic manifest in the generator's account on the national e-Manifest system, provided that such copies are readily available for viewing and production if requested by an EPA or authorized State inspector.
51. Pursuant to S.C. Code Ann. Regs. 61-79.262.40(a) [40 C.F.R. § 262.40(a)], a generator must retain a signed copy of each manifest as a record for at least three years from the date the waste was accepted by the initial transporter.
52. Pursuant to the RCRA Permit, Condition III.F., the Permittee shall inspect the container area weekly (generally every seven days, not to exceed any nine-day calendar interval), in accordance with the Inspection Schedule included in Section F of the Approved Permit Application, to detect leaking containers and deterioration of containers and the containment system caused by corrosion and other factors. Specifically, Section F-2b of the Approved Permit Application states that inspections of the two areas where hazardous waste containers are stored, the Organic and Inorganic Waste Storage Areas, are

performed on a weekly basis by Facility personnel meeting all hazardous waste management training requirements.

53. Pursuant to the RCRA Permit, Condition IV.B.2, the Permittee shall design, construct, and operate the secondary containment system for tank systems with secondary containment, in accordance with the detailed design plans and descriptions contained in Section D of the Approved Permit Application. Specifically, Section D-4 of the Approved Permit Application states that the shared secondary containment area for the Organic Hazardous Waste Storage Tanks is inspected weekly for gaps, cracks, or coating failure, and any required repairs are promptly performed.
54. Pursuant to the RCRA Permit, Condition IV.E.1, the Permittee shall inspect the tank systems, in accordance with the Inspection Schedule in Section F of the Approved Permit Application, and shall complete the items in Permit Conditions IV.E.2 and IV.E.3 as part of those inspections. Specifically, Section F-2b of the Approved Permit Application states that the Organic Hazardous Waste Storage Tanks are located within secondary containment areas that are inspected on a daily basis. Results of each daily inspection are recorded on an inspection log sheet.
55. Pursuant to the RCRA Permit, Condition IV.E.3, the Permittee shall inspect the components of the tank system once each operating day to detect erosion or signs of releases of hazardous waste.
56. Pursuant to the RCRA Permit, Condition I.E.9.a.v, the Permittee shall retain the following at the Facility, or at another location as approved by the SCDES: certification required by S.C. Code Ann. Regs. 61-79.264.73(b)(9) [40 C.F.R. § 264.73(b)(9)]. Specifically, S.C. Code Ann. Regs. 61-79.264.73(b)(9) [40 C.F.R. § 264.73(b)(9)] requires the owner or operator to record, as it becomes available, and maintain in the operating record for three years unless noted, a certification by the Permittee no less often than annually, that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment.
57. Pursuant to the RCRA Permit, Condition VII.A.1, in the event that the Permittee treats, stores, or disposes of hazardous wastes on site where such wastes were generated, then the Permittee must comply with R.61-79.264.73(b)(9), and Section 3005(h) of RCRA, 42 U.S.C. § 6925(h), and the Permittee must certify, no less than annually that the Permittee has a program (Waste Minimization Plan) in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the Permittee to be economically practicable.
58. Pursuant to the RCRA Permit, Condition VII.B., the Permittee shall maintain copies of this certification in the Facility operating record as required by R.61-79.264.73(b)(9) if Permit Condition VII.A. is applicable.

IV. FINDINGS OF FACTS

59. The Respondent owns and operates the Facility, located at 2151 King Street Extension, Charleston, South Carolina.
60. The Facility manufactures phosphorus chloride and numerous derivative products, such as flame-retardant additives and intermediate products for agrochemicals. The Facility also manufactures phosphorus trichloride (PCl₃), the largest volume product where the reactor liberates the chlorine and produces phosphorus. The Facility has five production units: Halide, High Temperature Phosphate (HTP), Organic Specialty Unit (OSU), BRIQUEST (Ethephon) Unit, and Thermal Oxidizer Unit (TOU).
61. The Respondent's RCRA Permit for the Facility became effective on October 11, 2014. The Permit allows the Permittee to store a total volume of 20,000 gallons of hazardous waste in two 10,000-gallon tanks: the East Organic Waste Tank and the West Organic Waste Tank (Organic Hazardous Waste Storage Tanks). Each tank is permitted to hold D001, D002, D028, F003, and F005 wastes.
62. The RCRA Permit expired on September 24, 2024. The Permittee timely submitted a Permit renewal application and the SCDES has not issued a new permit. Therefore, the RCRA Permit is administratively continued and remains in effect.
63. The Respondent's Hazardous Waste Generator Notification (EPA Form 8700-12), dated January 1, 2023, characterized the Facility as a LQG of hazardous waste. The Facility's waste streams have included used solvent and paint waste designated with various EPA Hazardous Waste Numbers, including, but not limited to, D001, D002, D003, D004, D005, D006, D007, D026, D028, F002, and F003.
64. On April 9, 2024, EPA inspectors, accompanied by inspectors for the SCDES, conducted an unannounced RCRA compliance evaluation inspection (CEI) at the Facility. The EPA's results of this CEI were provided to the Respondent in a report dated July 2, 2024.

Satellite Accumulation Area

65. At the time of the CEI, the inspectors observed one 4-liter amber jar for spent high-performance liquid chromatography (HPLC) which held 100 milliliters (mL) of liquid in the SAA of the Facility's Laboratory. The container was open, and the inspectors observed tubing from an idle HPLC machine in the container opening. No hazardous waste was being added to or removed from the open container.

Universal Waste

66. At the time of the CEI, the inspectors observed one container of spent lead acid batteries and one container holding a single spent lithium battery. The containers were not labeled with the words "Universal Waste – Battery(ies)," "Waste – Battery(ies)," or "Used Battery(ies)."

67. At the time of the CEI, the inspectors observed one square box of spent universal waste U-lamps that was labeled as "Other," and was not labeled with the words "Universal Waste – Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)".
68. At the time of the CEI, the Respondent was not able to demonstrate the length of time that universal waste had been accumulated from the date it became a waste or was received.

Permitted Area

69. At the time of the CEI, the inspectors observed hazardous waste leaking from a recirculation pump onto the secondary containment of the permitted hazardous waste storage tank - the West Organic Waste Tank.
70. At the time of the CEI, the inspectors observed an area of corroded concrete that needed repair under the sample port in the permitted secondary containment system.

Recordkeeping

71. At the time of the CEI, the inspectors reviewed the Facility's most recent Hazardous Waste Generator Notification (EPA Form 8700-12), which was last updated January 1, 2023. This notification was found to be missing Waste Code F003.
72. At the time of the CEI, the Respondent did not provide the names of employees filling positions related to hazardous waste management, or records documenting that the required training had been given to and completed by Facility personnel.
73. At the time of the CEI, the inspectors reviewed the Respondent's Contingency Plan, which did not include a current evacuation map, or a list of emergency response equipment and where the equipment is located at the Facility.
74. At the time of the CEI, the Respondent did not provide documentation (i.e., green return receipt cards, emails) that copies of the current Contingency Plan, which was last updated in 2023, were provided to the local emergency response agencies (i.e., fire, police, hospital) or to the Local Emergency Planning Committees (LEPCs).
75. At the time of the CEI, the inspectors requested copies of hazardous waste manifest records for review, but the Respondent was not able to make copies of those records available for viewing.
76. At the time of the CEI, the inspectors observed that the Respondent had not recorded the time of each inspection on the permitted 2022 Organic Hazardous Waste Central Accumulation Area (HWCAA) weekly inspection log sheets, and the Respondent's environmental file database did not include inspection log sheets for weekly inspections of the permitted container storage area during the weeks of December 1, 2023, and December 18, 2023.

77. At the time of the CEI, the inspectors observed that the daily tank inspections did not document the leaking recirculation pump nor the corroded secondary containment under the sample port, which were observed at the time of the CEI. In addition, the inspectors observed that the January 30, 2022, March 9, 2022, and March 21, 2022, daily tank inspection log sheets for the permitted Organic Hazardous Waste Storage Tank System were blank.
78. At the time of the CEI, the inspectors requested annual certifications, from 2021 through 2023, of the Respondent's Waste Minimization Plan, but the Respondent was not able to provide the requested certifications.

V. ALLEGED VIOLATIONS

79. The Respondent is a "person" as defined in S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10].
80. The Respondent is the "owner" and "operator" of a "facility" located in Charleston, South Carolina, as those terms are defined in S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10].
81. The Respondent generates wastes that are "solid wastes" and "hazardous wastes" as those terms are defined in S.C. Code Ann. Regs. 61-79.260.10, 61-79.261.2, and 61-79.261.3 [40 C.F.R. §§ 260.10, 261.2, and 261.3].
82. The Respondent is a "LQG" of hazardous waste as defined in S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10].

Satellite Accumulation Area

83. The Respondent failed to close one container of hazardous waste in an SAA. The EPA therefore alleges that the Respondent violated Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925] by storing hazardous waste without a permit or interim status, because the Respondent failed to meet a condition of the SAA Permit Exemption, by failing to keep containers of hazardous waste closed in accordance with S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)].

Universal Waste

84. The Respondent failed to label two containers of universal waste batteries. The EPA therefore alleges that the Respondent violated S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 273.14(a)] by failing to label two containers of universal waste batteries clearly with the words "Universal Waste – Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."
85. The Respondent failed to label one container of universal waste lamps. The EPA therefore alleges that the Respondent violated S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. §

273.14(e)] by failing to label one container of universal waste lamps clearly with the words “Universal Waste – Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).”

86. The Respondent failed to demonstrate the length of time three containers of universal waste had been accumulated. The EPA therefore alleges that the Respondent violated S.C. Code Ann. Regs. 61-79.273.15(a) and (c) [40 C.F.R. § 273.15(a) and (c)] by failing to demonstrate the length of time the Facility’s universal waste had been accumulated from the date that the universal waste became a waste or was received.

Permitted Storage Area

87. The Respondent failed to remove a leaking recirculation pump associated with the permitted hazardous waste storage tank from service to determine the cause of release and remediate spills of hazardous waste. The EPA therefore alleges that the Respondent violated RCRA Permit Conditions IV.D.1 and IV.D.2, because the Respondent failed to remove the pump from service immediately upon a leak or spill from the tank system and stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release, and remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the system.
88. The Respondent failed to maintain secondary containment free from gaps, cracks, deterioration, or coating failure. The EPA therefore alleges that the Respondent violated RCRA Permit Condition IV.B.2 by failing to promptly perform required repairs to the secondary containment in accordance with Section D-4 of the Approved Permit Application, and RCRA Permit Condition IV.E.1 by failing to promptly make repairs in accordance with Section F-b of the Approved Permit Application.

Recordkeeping

89. The Respondent generated F003 hazardous waste but did not include this EPA Waste Code in the most recent Hazardous Waste Generator Notification (EPA Form 8700-12). The EPA therefore alleges that the Respondent violated S.C. Code Ann. Regs. 61-79.262.12(b), an authorized State requirement that is more stringent than the federal re-notification requirement found in 40 C.F.R. § 262.18(d)(2), by failing to file a revised or new Site Identification Form for the new hazardous waste within 30 days after such waste was first produced.
90. The Respondent failed to maintain the job titles and job descriptions for each position at the Facility related to hazardous waste management, and the name of the employee filling each job. The EPA therefore alleges that the Respondent violated RCRA Permit Condition II.G. because the Respondent failed to meet hazardous waste recordkeeping requirements found in S.C. Code Ann. Regs. 61-79.264.16(d) and (e) [40 C.F.R. § 264.16(d) and (e)].
91. The Respondent’s Contingency Plan did not include a current evacuation map or a list of emergency response equipment. The EPA therefore alleges that the Respondent violated

RCRA Permit Condition II.E.1, because the Respondent failed to comply with the contingency plan requirements in S.C. Code Ann. Regs. 61-79.264.52(e) and (f) [40 C.F.R. § 264.52(e) and (f)].

92. The Respondent did not provide documentation that the Contingency Plan had been provided to the local emergency response agencies. The EPA therefore alleges that the Respondent violated RCRA Permit Condition II.E.2, because the Respondent failed to comply with the contingency plan requirements in S.C. Code Ann. Regs. 61-79.264.53(b) [40 C.F.R. § 264.53(b)].
93. The Respondent did not make copies of hazardous waste manifest records available for viewing when requested by the inspectors. The EPA therefore alleges that the Respondent violated S.C. Code Ann. Regs. 61-79.262.40 [40 C.F.R. § 262.40] because the Respondent failed to retain a signed copy of each manifest as a record for at least three years from the date the waste was accepted by the initial transporter, and by failing to make copies of the hazardous waste manifest records readily available for viewing and production when requested by the inspectors in accordance with S.C. Code Ann. Regs. 61-79.262.24(a)(3) [40 C.F.R. § 262.24(a)(3)].
94. The Respondent failed to properly complete weekly inspections of the permitted HWCAA. The EPA therefore alleges that the Respondent violated RCRA Permit Condition III.F. by failing to properly complete weekly inspections in accordance with Section F of the Approved Permit Application.
95. The Respondent failed to properly complete daily inspections of the permitted tank system - the Organic Hazardous Waste Storage Tanks. The EPA therefore alleges that the Respondent violated RCRA Permit Condition IV.E.1 by failing to conduct daily inspections in accordance with Section F-2b of the Approved Permit Application, and Permit Condition IV.E.3 by failing to conduct inspections of the tank system once each operating day.
96. The Respondent failed to provide three annual certifications of the Waste Minimization Plan. The EPA therefore alleges that the Respondent violated RCRA Permit Condition I.E.9.a.v, by failing to comply with waste minimization plan certification and recordkeeping requirements found in S.C. Code Ann. Regs. 61-79.264.73(b)(9) [40 C.F.R. § 264.73(b)(9)].

VI. STIPULATIONS

97. The issuance of this CAFO simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).
98. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), the Respondent:
 - a. admits that the EPA has jurisdiction over the subject matter alleged in this CAFO;
 - b. neither admits nor denies the factual allegations set forth in Section IV (Findings of Facts) of this CAFO;

- c. consents to the assessment of a civil penalty as stated below;
 - d. consents to the conditions specified in this CAFO;
 - e. waives any right to contest the allegations set forth in Section V (Alleged Violations) of this CAFO; and
 - f. waives its rights to appeal the Final Order accompanying this CAFO.
99. For the purpose of this proceeding, the Respondent:
- a. agrees that this CAFO states a claim upon which relief may be granted against the Respondent;
 - b. acknowledges that this CAFO constitutes an enforcement action for purposes of considering the Respondent's compliance history in any subsequent enforcement actions;
 - c. waives any and all remedies, claims for relief, and otherwise available rights to judicial or administrative review that the Respondent may have with respect to any issue of fact or law set forth in this CAFO, including any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706;
 - d. waives any rights it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to compel compliance with the CAFO, and to seek an additional penalty for such noncompliance, and agrees that federal law shall govern in any such civil action;
 - g. waives any right it may have pursuant to 40 C.F.R. § 22.8 to be present during any discussions with, or to be served with and reply to, any memorandum or communication addressed to EPA officials where the purpose of such discussion, memorandum, or communication is to persuade such official to accept and issue this CAFO;
 - h. waives any rights or defenses that the Respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the Final Order accompanying this Consent Agreement; and
 - e. agrees to comply with the terms of this CAFO.
100. By executing this CAFO, the Respondent certifies to the best of its knowledge that the Respondent is currently in compliance with all relevant requirements of SCHWMA, S.C. Code Ann. §§ 44-56-10 *et seq.*, and the SCHWMR, S.C. Code Ann. Regs. 61-79.260-270, 61-79.273, and 61-79.279, and the Act and its implementing regulations, and that all violations alleged herein, which are neither admitted nor denied, have been corrected.

101. In accordance with 40 C.F.R. § 22.5, the individuals named in the Certificate of Service are authorized to receive service related to this proceeding and the Parties agree to receive service by electronic means.

VII. TERMS OF PAYMENT

102. The Respondent consents to the payment of a civil penalty, which was calculated in accordance with the Act, in the amount of **ONE HUNDRED TWENTY-ONE THOUSAND AND SIX HUNDRED DOLLARS (\$121,600.00)**, which is to be paid within 30 days of the Effective Date of this CAFO.
103. The Respondent shall pay the civil penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the following EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions, see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>. However, for any payments made after September 30, 2025, and in accordance with the March 25, 2025, Executive Order on [Modernizing Payments To and From America's Bank Account](#), the Respondent shall pay using one of the electronic payment methods listed on <https://www.epa.gov/financial/makepayment> and will not pay with a paper check. In addition, Respondent shall identify every payment with Respondent's name and the docket number of this CAFO, Docket No. RCRA-04-2025-4004(b).
104. The Respondent shall send proof of payment, within 24 hours of payment of the civil penalty, to:

Regional Hearing Clerk
R4_Regional_Hearing_Clerk@epa.gov

and

Sarah Rowell
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
rowell.sarah@epa.gov

and

U.S. Environmental Protection Agency
Cincinnati Finance Center
CINWD_AcctsReceivable@epa.gov

105. "Proof of payment" means, as applicable, a copy of the check, confirmation of credit card or debit card payment, confirmation of wire or ACH transfer, and any other information required to demonstrate that payment has been made according to EPA requirements, in

the amount due, and identified with the Respondent's name and Docket No. RCRA-04-2025-4004(b).

106. Pursuant to 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if the Respondent fails to remit the civil penalty as agreed to herein, the EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the costs of processing and handling the delinquent claim. Accordingly, the EPA may require the Respondent to pay the following amounts on any amount overdue:
107. Interest. Interest will begin to accrue on the civil penalty from the Effective Date of this CAFO. If the civil penalty is paid within 30 days of the Effective Date of this CAFO, interest is waived. However, if the civil penalty is not paid in full within 30 days, interest will continue to accrue on any unpaid portion until the unpaid portion of the civil penalty and accrued interest are paid. To protect the interests of the United States the rate of interest is set at the IRS large corporate] underpayment rate, any lower rate would fail to provide Respondent adequate incentive for timely payment;
- b. Non-Payment Penalty. On any portion of a civil penalty more than 90 days past due, the Respondent must pay a non-payment penalty of not more than six percent (6%) per annum, which will accrue from the date the penalty payment became due and is not paid, as provided in 31 U.S.C. § 3717(e)(2) and 31 C.F.R. § 901.9(d). This non-payment penalty is in addition to charges which accrue or may accrue under subparagraphs (a) and (c) and will be assessed monthly. 40 C.F.R. § 13.11(c); and
- i. Monthly Handling Charge. The Respondent must pay a late payment handling charge to cover the administrative costs of processing and handling the delinquent claim, based on either actual or average cost incurred. 31 C.F.R. § 901.9(b) and (c) and 40 C.F.R. § 13.11(b). Administrative costs will be assessed monthly throughout the period the debt is overdue except as provided by 40 C.F.R. § 13.12.
108. In addition to what is stated in the prior Paragraph, if the Respondent fails to timely pay any portion of the penalty assessed under this CAFO, the EPA may:
- a. refer the debt to a credit reporting agency or a collection agency (*see* 40 C.F.R. §§ 13.13 and 13.14);
- b. collect the debt by administrative offset (i.e., the withholding of money payable by the United States to, or held by the United States for, a person to satisfy the debt the person owes the Government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds (*see* 40 C.F.R. Part 13, Subparts C and H);
- c. suspend or revoke the Respondent's licenses or other privileges, or suspend or disqualify the Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds (*see* 40 C.F.R. § 13.17); and/or

- d. refer the debt to the Department of Justice as provided in 40 C.F.R. § 13.33. In any such judicial action, the validity, amount, and appropriateness of the penalty and of this CAFO shall not be subject to review.
109. Penalties paid pursuant to this CAFO shall not be deductible for purposes of federal taxes.
110. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, the EPA is required to send a completed Form 1098-F (“Fines, Penalties, and Other Amounts”) to the Internal Revenue Service (IRS) annually with respect to any court order and settlement agreement (including administrative settlements), that requires a payor to pay an aggregate amount that the 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.” The EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (for example, a copy of Form 1098-F). In order to provide the EPA with sufficient information to enable it to fulfill these obligations, the EPA herein requires, and the Respondent herein agrees, that:
- a. The Respondent shall complete a Form W-9 (“Request for Taxpayer Identification Number and Certification”), which is available at <https://www.irs.gov/pub/irs-pdf/fw9.pdf>;
 - b. The Respondent shall therein certify that its completed Form W-9 includes the Respondent’s correct Tax Identification Number (TIN) or that the Respondent has applied and is waiting for issuance of a TIN;
 - c. The Respondent shall email its completed Form W-9 to the EPA’s Cincinnati Finance Center Region 4 contact, Jessica Henderson (Henderson.Jessica@epa.gov), on or before the date that the Respondent’s initial penalty payment is due, pursuant to Paragraph 102 of this CAFO, and the EPA recommends encrypting Form W-9 email correspondence; and
 - d. In the event that the Respondent has certified in its completed Form W-9 that it has applied for a TIN and that TIN has not been issued to the Respondent by the date that its initial penalty payment is due, then the Respondent, using the same email address identified in the preceding subparagraph, shall further:
 - i. notify the EPA’s Cincinnati Finance Center of this fact, via email, by the date that the Respondent’s initial penalty payment is due; and
 - ii. provide the EPA’s Cincinnati Finance Center with the Respondent’s TIN, via email, within five (5) days of Respondent’s issuance and receipt of the TIN.
111. Failure to comply with providing Form W-9 or TIN may subject the Respondent to a penalty. See 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1.

VIII. EFFECT OF CAFO

112. In accordance with 40 C.F.R. § 22.18(c), the Respondent's full compliance with this CAFO shall only resolve the Respondent's liability for federal civil penalties for the violations and facts specifically alleged above.
113. Full payment of the civil penalty, as provided in Section VII (Terms of Payment) shall satisfy the requirements of this CAFO; but, shall not in any case affect the right of the EPA or the United States to pursue other equitable relief or criminal sanctions for any violations of law. 40 C.F.R. § 22.18(c).
114. Any violation of this CAFO may result in a civil penalty for each day of continued noncompliance with the CAFO and/or the suspension or revocation of any federal or state permit issued to the violator, as provided in Section 3008(c) of the Act, 42 U.S.C § 6928(c).
115. Nothing in this CAFO shall relieve the Respondent of the duty to comply with all applicable provisions of the Act and 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, except as expressly provided herein.
116. Nothing herein shall be construed to limit the power of the EPA to undertake any action against the Respondent or any person in response to conditions that may present an imminent and substantial endangerment as provided under the Act.
117. The terms and conditions and compliance requirements of this CAFO may not be modified or amended except upon the written agreement of both Parties, and approval of the Regional Judicial Officer.
118. The provisions of this CAFO shall apply to and be binding upon the Respondent and its successors and assigns. The Respondent shall direct its officers, directors, employees, agents, trustees, and authorized representatives to comply with the provisions of this CAFO, as appropriate.
119. Any change in the legal status of the Respondent, or change in ownership, partnership, corporate or legal status relating to the Facility, will not in any way alter the Respondent's obligations and responsibilities under this CAFO.
120. By signing this Consent Agreement, the Respondent acknowledges that this CAFO will be available to the public and agrees that this CAFO does not contain any confidential business information or personally identifiable information.
121. By signing this Consent Agreement, the Complainant and the undersigned representative of the Respondent each certify that each person is fully authorized to execute and enter into the terms and conditions of this CAFO and has the legal capacity to bind the Party represented by that person to this CAFO.

122. By signing this Consent Agreement, both Parties agree that each Party's obligations under this CAFO constitute sufficient consideration for the other Party's obligations.
123. By signing this Consent Agreement, the Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and continues to be, true, accurate, and complete for each such submission, response, and statement. The Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.
124. The EPA also reserves the right to revoke this CAFO and settlement penalty if and to the extent that the EPA finds, after signing this CAFO, that any information provided by the Respondent was materially false or inaccurate at the time such information was provided to the EPA. If such false or inaccurate material was provided, the EPA reserves the right to assess and collect any and all civil penalties for any violation described herein. The EPA shall give the Respondent notice of its intent to revoke, which shall not be effective until received by the Respondent in writing.
125. Unless specifically stated otherwise in this CAFO, each Party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.
126. It is the intent of the Parties that the provisions of this CAFO are severable. If any provision or authority of this CAFO or the application of this CAFO to any Party or circumstances is held by any judicial or administrative authority to be invalid or unenforceable, the application of such provisions to other Parties or circumstances and the remainder of the CAFO shall remain in force and shall not be affected thereby.

IX. EFFECTIVE DATE

127. This CAFO shall become effective after execution of the Final Order by the Regional Judicial Officer, on the date of filing with the Regional Hearing Clerk.

[Remainder of Page Intentionally Left Blank

Complainant and the Respondent will Each Sign on Separate Pages.]

The foregoing Consent Agreement *In the Matter of LANXESS CORPORATION*, Docket No. **RCRA-04-2025-4004(b)**, is Hereby Stipulated, Agreed, and Approved for Entry.

FOR RESPONDENT:

Signed by:  F49EA969A92A413...		13 October 2025
Signature	Date	
Printed Name:	Glen Bowen	
Title:	Head of BU PLA Americas	
Address:	Lanxess Corporation, 111 RIDC Parkwest, Pittsburgh, PA	

The foregoing Consent Agreement *In the Matter of LANXESS CORPORATION*, Docket No. **RCRA-04-2025-4004(b)** is Hereby Stipulated, Agreed, and Approved for Entry.

FOR COMPLAINANT:

Keriema S. Newman, Director
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

In the Matter of:

LANXESS CORPORATION
2151 King Street Extension, Charleston, **South
Carolina 29405**
EPA ID No.: **SCD003358389**

Respondent.

Docket No. **RCRA-04-2025-4004(b)**

Proceeding Under Section 3008(a) of the
Resource Conservation and Recovery Act,
42 U.S.C. § 6928(a)

FINAL ORDER

The Regional Judicial Officer is authorized to ratify this Consent Agreement which memorializes a settlement between Complainant and the Respondent. 40 C.F.R. §§ 22.4(b) and 22.18(b)(3). The foregoing Consent Agreement is, therefore, hereby approved, ratified, and incorporated by reference into this Final Order in accordance with 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.

The Respondent is hereby ORDERED to comply with all of the terms of the foregoing Consent Agreement effective immediately upon filing of this Consent Agreement and Final Order with the Regional Hearing Clerk. This Final Order disposes of this matter pursuant to 40 C.F.R. §§ 22.18 and 22.31.

BEING AGREED, IT IS SO ORDERED.

Regional Judicial Officer

CERTIFICATE OF SERVICE

I certify that the foregoing Consent Agreement and Final Order, *In the Matter of LANXESS CORPORATION*, Docket No. **RCRA-04-2025-4004(b)**, were filed and copies of the same were emailed to the Parties as indicated below.

Via email to all Parties at the following email addresses:

Respondent: Eric Banks
Head of Health and Safety and Environmental Quality
Lanxess Corporation
eric.banks@lanxess.com
(336) 317-5529

EPA: Sarah Rowell
Environmental Engineer
rowell.sarah@epa.gov
(404) 562-9418

Joshua Lee
Associate Regional Counsel
lee.joshua@epa.gov
(404) 562-9255

Regional Hearing Clerk
R4_Regional_Hearing_Clerk@epa.gov