

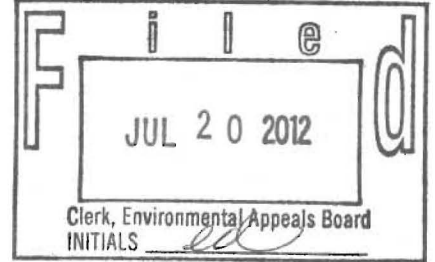
**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In the Matter of:)

Haldor Topsoe, Inc.)

Respondent)

) TSCA-HQ-2012-5015



FINAL ORDER

On June 20, 2012, the U.S. Environmental Protection Agency's Office of Civil Enforcement, Waste and Chemical Enforcement Division ("EPA"), filed a complaint against Haldor Topsoe, Inc. ("Haldor Topsoe"), alleging that Haldor Topsoe failed to comply with the reporting requirements of section 8(a) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2607(a), and the Inventory Update Reporting Rule promulgated thereunder at 40 C.F.R. Part 710, therefore violating section 15 of TSCA, 15 U.S.C. § 2614. The complaint proposed a civil penalty of \$202,779. The Consolidated Rules of Practice, codified at 40 C.F.R. part 22, govern this administrative proceeding. Section 22.18(a) of the Consolidated Rules of Practice states that a respondent may opt for a *quick resolution* of the proceeding at any time by paying the specific penalty proposed in the complaint. 40 C.F.R. § 22.18(a)(1). On July 5, 2012, EPA informed the Environmental Appeals Board ("Board") that it had received a copy of the instrument of payment for the full amount of the \$202,779 penalty from Haldor Topsoe in resolution of the above-captioned matter.

In accordance with section 22.18(a)(3), upon receipt of payment in full the Board shall issue a final order. 40 C.F.R. § 22.18(a)(3). Payment by respondent constituted a waiver of

respondent's rights to contest the allegations and to appeal the final order. *Id.* Therefore, the above-captioned matter case is hereby RESOLVED civilly for the violations and facts alleged in the complaint.

So ordered.

ENVIRONMENTAL APPEALS BOARD

Dated: *July 20, 2018*

By: *Lesly M. Fraser*
Lesly M. Fraser
Environmental Appeals Judge

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Final Order in the Matter of Haldor Topsoe, Inc., Docket No. TSCA-HQ-2012-5015, were sent to the following persons in the manner indicated:

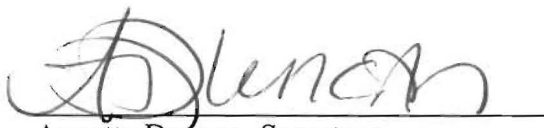
By Facsimile and Pouch Mail:

Erin Saylor, Attorney Advisor
Waste and Chemical Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W. (Mail Code 2249A)
Washington, D.C. 20460
Ph: 202-564-6124
Fax: 202-564-0035

By First Class U.S. Mail:

Anders Olsen
Chief Executive Officer
Haldor Topsoe, Inc.
17629 El Camino Real, Suite 300
Houston, Texas 77058

Edward Lewis, Partner
Fulbright & Jaworski LLP
Fulbright Tower
1301 McKinney, Suite 5100
Houston, Texas 77010-3095



Annette Duncan, Secretary
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

JUL 20 2012

Dated: _____