UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2

In the Matter of:

Brookdale Hospital Center Housing Company, Inc.,

Respondent,

Proceeding Under Section 3008 of the Resource Conservation and Recovery Act as amended.

AMENDMENT TO COMPLAINT
Docket No. RCRA-02-2015-7102

U.S. Environmental Protection Agency-Reg 2
2016 JAN - 7 PM 12: 48

WHEREAS on August 4, 2014, Complainant in this proceeding, the Director of the Division of Enforcement and Compliance Assistance, United States Environmental Protection Agency, Region 2, issued a Complaint and Notice of Opportunity for Hearing (the "Complaint") to Respondent Brookdale Hospital Center Housing Company, Inc. ("Respondent").

WHEREAS in an email dated 12/14/15, Respondent indicated that its actual corporate name is "The Brookdale Hospital Medical Center."

WHEREAS the Parties have agreed that it is appropriate that the corporate name of "The Brookdale Hospital Medical Center" will replace the corporate name of "Brookdale Hospital Center Housing Company, Inc." in the caption and other parts of the Complaint.

WHEREBY:

- 1. The caption of the Complaint is amended to read "The Brookdale Hospital Medical Center, Docket Number RCRA-02-2015-7102."
- 2. The named Respondent in Complaint is revised to be "The Brookdale Hospital Medical Center."
- 3. All references to "Brookdale Hospital Center Housing Company, Inc.," Respondent, in the Complaint are replaced by Respondent "The Brookdale Hospital Medical Center" in which entity is also referred to as Brookdale.

<u>In the Matter of Brookdale Hospital Center Housing Company, In</u>c., <u>Docket Number RCRA-02-2015-7102</u>

COMPLAINANT:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2

Dore LaPosta, Director

Division of Enforcement and Compliance Assistance U.S. Environmental Protection Agency - Region 2 290 Broadway

New York, New York 10007

DATE: DECEMBER 24, 2015

In the Matter of Brookdale Hospital Center Housing Company, Inc., Docket Number RCRA 22-2015-7102

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CERTIFICATE OF SERVICE

I certify that I have this day caused to be sent the foregoing Amendment to the Complaint bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and One Copy By Hand:

Karen Maples Regional Hearing Clerk U.S. Environmental Protection Agency- Region 2 290 Broadway, 16th floor New York, New York 10007-1866

Copy by EMAIL:

Lisa D. Hayes Assistant General Counsel The Brookdale Hospital Medical Center 1 Brookdale Plaza Brooklyn, New York 11212-3198

Dated: 1/6/16

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