

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

# VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

SEP 18 2014

Mrs. Vickey Bratcher Majors Management LLC. Post Office Box 1565 Lawrenceville, GA 30046

Re: Consent Agreement and Final Order

Majors Management LLC.

Docket Number: RCRA-04-2014-0001

Dear Mrs. Vickey Bratcher:

Enclosed is a copy of the executed CA/FO as filed with the Regional Hearing Clerk (RHC) in the above-referenced matter. The CA/FO is effective on the date it is filed with the RHC, and the penalty due date is calculated from the effective date.

Also enclosed is a document entitled "Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings." This document puts Environmental Remedies, LLC on notice of its potential duty to disclose to the Securities Exchange Commission any environmental actions taken by the United States Environmental Protection Agency.

If you have any questions, please feel free to contact Roberto X. Busó, Associate Regional Counsel, at (404) 562-8530.

a commen

Michael Norman, Chief

Restoration and Underground Storage Tanks

Branch

**RCRA** Division

#### Enclosure

cc: Jason Wiles. P.L.

President/ CEO

7G Environmental Compliance Management LLC.

Post Office Box 3433

Tallahassee, FL 32315

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 4

				0	
IN THE MATTER OF:	)	Docket No.: RCRA-UST-04-20	H-00	可	EP -
	)		A	4	DA.
Majors Management, LLC	)	Proceeding under Section 9006	=		MM
Post Office Box 1565	)	of the Resource Conservation	5	ω	OZ
Lawrenceville, Georgia 30046	)	and Recovery Act, as amended	2	3	웃띰
	)	42 U.S.C. § 6991e	1	0	Z
RESPONDENT.	)		£	ယ	
	)			1	

## CONSENT AGREEMENT

## I. NATURE OF THE ACTION

- 1. This is a civil administrative enforcement action, ordering compliance with the requirements of the Georgia Underground Storage Tank Act (GUSTA), Official Code of Georgia Annotated Act (O.C.G.A), O.C.G.A. §§ 12-13-1 et seq. [Subtitle I of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6991 et seq.]. This action seeks civil penalties pursuant to Section 9006 of RCRA, 42 U.S.C. § 6991e, for violations of GUSTA and its corresponding regulations, set forth at GUST Rule 391-3-15 et seq. [Subtitle I of RCRA and its corresponding regulations, set forth at Title 40 of the Code of Federal Regulations (40 C.F.R.), Part 280].
- 2. 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, provide that where the parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding may be simultaneously commenced and concluded by the issuance of a Consent Agreement and Final Order (CA/FO). 40 C.F.R. §§ 22.13 and 22.18(b)(2).
- 3. The parties have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18, and desire to settle this action. Accordingly, before any testimony has been taken upon the pleadings and without any admission of violation or adjudication of any issue of fact or law, and in accordance with 40 C.F.R. § 22.13(b), the parties have agreed to the execution of this CA/FO, and Respondent hereby agrees to comply with the terms of this CA/FO.

## II. THE PARTIES

- 4. Complainant is the Director, RCRA Division, Region 4, United States Environmental Protection Agency (EPA). Complainant is authorized to issue the instant CA/FO pursuant to Section 9006 of RCRA, 42 U.S.C. § 6991e, and applicable delegations of authority.
- 5. Respondent is Majors Management, LLC, the owner of underground storage tank (UST) systems at the following locations: (1) Chevron 400 Food Mart, 104 South Highway 400, Dawsonville, Georgia 30534; (2) Chevron Food Mart (formerly Sav-A-Ton), 807 North Main

Street, Lafayette, Georgia 307287; (3) Canton Food Mart, 3005 Canton Highway, Ball Ground, Georgia 30107; and (4) Riverstone Texaco, 1490 Riverstone Parkway, Canton, Georgia 30114 (collectively referred to as "the Facilities").

### III. PRELIMINARY STATEMENTS

- 6. Pursuant to Section 9004 of RCRA, 42 U.S.C. § 6991c, the State of Georgia (State) received final authorization from EPA to carry out the State UST program in lieu of the federal UST program. The requirements of the authorized State program are found at GUST Rule 391-3-15 *et seq.*; however, for ease of reference, the federal citations will follow in brackets.
- 7. Although EPA has granted the State authority to enforce its own UST program, EPA retains jurisdiction and authority to initiate independent enforcement actions in the State pursuant to Section 9006 of RCRA, 42 U.S.C. § 6991e. This authority is exercised by EPA in the manner set forth in the Memorandum of Agreement between EPA and the State.
- 8. Pursuant to Section 9006(a)(2) of RCRA, 42 U.S.C. § 6991e (a)(2), Complainant has given notice of this action to the State.
- 9. Section 12-13-6 of GUSTA [Section 9003 of RCRA, 42 U.S.C. § 6991b] authorizes the promulgation of release detection, prevention, and corrective action regulations applicable to all owners and operators of UST systems as may be necessary to protect human health and the environment. These regulations are found at GUST Rule 391-3-15 et seq [40 C.F.R. Part 280].
- 10. Pursuant to GUST Rule 391-3-15-.11 [40 C.F.R. § 280.70(a)], all UST system owners and operators must continue operation and maintenance of release detection in a temporarily closed tank if it is not empty (i.e., if more than 2.5 centimeters of residue or 0.3 percent by weigh of the total capacity of the UST system remain in the system).
- 11. Pursuant to GUST Rule 391-3-15-.08 [40 C.F.R. § 280.50)], all UST system owners and operators must report a suspected release within twenty-four (24) hours to the implementing agency.
- 12. Pursuant to GUST Rule 391-3-15-.07 [40 C.F.R. § 280.45(b)], all UST system owners and operators must maintain the results of sampling, testing or monitoring for release detection for at least one (1) year.
- 13. Pursuant to GUST Rule 391-3-15-.07 [40 C.F.R. §§ 280.41 and 280.44], a test of piping (i.e., line tightness test) used to comply with the release detection requirements must be conducted annually, and be able to detect 0.1 gallon per hour leak rate at one and one-half times the operating pressure.

- 14. Pursuant to GUST Rule 391-3-15-.07 [40 C.F.R. §280.44], automatic line leak detectors must be tested annually, and be capable of detecting leaks of three (3) gallons per hour at ten (10) pounds per square inch line pressure within one (1) hour.
- 15. Pursuant to GUST Rule 391-3-15-.06 [40 C.F.R. § 280.31(c)], all owners and operators of steel UST systems equipped with an impressed current corrosion protection system must ensure the impressed current system is inspected every 60 days.
- 16. Pursuant to GUST Rule 391-3-15-.06 [40 C.F.R. § 280.31(b)], all owners and operators of UST systems with cathodic protection must ensure these systems are inspected by a qualified cathodic protection tester at least once every three (3) years.

## IV. ALLEGATIONS AND DETERMINATIONS

- 17. Respondent is a "person" as defined in GUST Rule 391-3-15-.02 [40 C.F.R. § 280.12].
- 18. Respondent is the "owner" of "underground storage tanks" used as "petroleum UST systems" as those terms are defined in GUST Rule 391-3-15-.02 [40 C.F.R. § 280.12].
- 19. The USTs at the Facilities are "existing tank systems" storing "regulated substances" as those terms are defined in GUST Rule 391-3-15-.02 [40 C.F.R. § 280.12].
- 20. On February 23, 2013, EPA conducted a petroleum UST system compliance inspection (CI) at Chevron 400 Food Mart, located at 104 South Highway 400, Dawsonville, Georgia 30534.
- 21. At the time of the CI at Chevron 400 Food Mart, Respondent failed to produce release detection records for Tank 4 (missing 2 months) and Tank 5 (missing 12 months) at this facility.
- 22. EPA therefore alleges that Respondent violated GUST RULE 391-3-15-.07 [40 C.F.R. § 280.45(b)] by failing to maintain all results of sampling, testing, or monitoring for release detection for at least one (1) year for Tank 4 and Tank 5 at Chevron 400 Food Mart.
- 23. At the time of the CI at Chevron 400 Food Mart, Respondent produced records indicating that line tightness and line leak detector functionality tests were not performed annually on piping associated with Tank 5 at this facility.
- 24. EPA therefore alleges that Respondent violated, GUST RULE 391-3-15-.07 [40 C.F.R. § 280.44], by failing to perform annual line tightness tests and annual testing of the automatic line leak detectors associated with Tank 5 at Chevron 400 Food Mart.
  - 25. On December 5, 2012, EPA conducted a petroleum UST CI at Chevron Food

Mart (formerly Sav-A-Ton), located at 800 North Main Street, Lafayette, Georgia 30728.

- 26. At the time of the CI at Chevron Food Mart, Respondent produced records indicating that cathodic protection system tests were not performed once every three (3) years at this facility (tests were performed on March 26, 2009, and on December 14, 2012).
- 27. EPA therefore alleges that Respondent violated GUST RULE 391-3-15-.06 [40 C.F.R. § 280.31(b)(1)] by failing to perform a cathodic protection test at least once every three (3) years at Chevron Food Mart.
- 28. At the time of the CI at Chevron Food Mart, Respondent failed to produce records documenting that the impressed current system was monitored at least once every sixty (60) days at this facility.
- 29. EPA therefore alleges that Respondent violated GUST RULE 391-3-15-.06 [40 C.F.R. § 280.31(c)] by failing to inspect the impressed current system at least once every sixty (60) days at Chevron Food Mart.
- 30. At the time of the CI at Chevron Food Mart, Respondent produced records indicating that line tightness and line leak detector functionality tests were not performed annually on piping at this facility.
- 31. EPA therefore alleges that Respondent violated GUST RULE 391-3-15-.07 [40 C.F.R. § 280.44] by failing to perform annual line tightness tests and annual testing of the automatic line leak detectors at Chevron Food Mart.
- 32. On February 27, 2013, EPA conducted a petroleum UST CI at Canton Food Mart, located at 3005 Canton Highway, Ball Ground, Georgia 30107.
- 33. At the time of the CI at Canton Food Mart, Respondent produced information indicating that a suspected release for Tank 1 at this facility (failing release detection results from May through September 2012) was not reported to the implementing agency.
- 34. EPA therefore alleges that Respondent violated GUST RULE 391-3-15-.07 [40 C.F.R. § 280.50] by failing to report a suspected release from an UST systems at Canton Food Mart.
- 35. On February 27, 2013, EPA conducted a petroleum UST CI at Riverstone Texaco (formerly Citgo), located at 1490 Riverstone Parkway, Canton, Georgia 30114.
- 36. At the time of the CI at Riverstone Texaco, Tank 5 and Tank 6 were in temporarily out of service status and not empty (Tank 5 contained approximately 4 inches of water and 1 inch of petroleum; Tank 6 contained approximately 8 inches of petroleum).

Respondent failed to produce records documenting that these tanks were monitored for release detection every thirty (30) days (Tank 5 missing 12 months, Tank 6 missing 3 months).

37. EPA therefore alleges that Respondent violated GUST RULE 391-3-15-.11 [40 C.F.R. § 280.70(a)] by failing to continue release detection in temporarily closed tanks that are not empty at Riverstone Texaco.

### V. TERMS OF AGREEMENT

Based on the foregoing, the parties agree to the following:

- 38. Respondent has submitted information demonstrating that all the alleged violations identified in this CA/FO have been corrected and the Facilities identified in this CA/FO are in compliance with the above cited regulations.
- 39. For the purposes of this CA/FO, Respondent admits the jurisdictional allegations set forth above pursuant to Section 9006 of RCRA, 42 U.S.C. § 6991e.
- 40. Pursuant to 40 C.F.R. § 22.18(b)(2), Respondent neither admits nor denies the factual allegations set forth above.
- 41. Pursuant to 40 C.F.R. § 22.18(b)(2), Respondent waives any right to contest the EPA allegations and its right to appeal the CA/FO.
- 42. Respondent waives its right to challenge the validity of this CA/FO and the settlement of the matters addressed in this CA/FO on the basis of any issue related to the Paperwork Reduction Act.
- 43. Respondent waives any right it may have pursuant to 40 C.F.R. § 22.8 to participate in any communication addressed to EPA officials where the purpose of such communication is to persuade such officials to accept and issue this CA/FO.
- 44. 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 CA/FO, including any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.
- 45. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of GUSTA and RCRA Subtitle I.
- 46. The parties agree that compliance with the terms of this CA/FO shall resolve Respondent's liability for civil penalties for the violations and facts alleged and stipulated to in this CA/FO.

47. The parties agree that they will pay their own costs and attorney's fees.

## VI. PAYMENT OF CIVIL PENALTY

- 48. Respondent consents to the payment of a civil penalty in the amount of **FORTY FIVE THOUSAND, ONE HUNDRED EIGHTY NINE DOLLARS (\$45,189.00)**, payable as follows.
  - a. With regards to the alleged violations at Chevron 400 Food Mart, a civil penalty in the amount of TWENTY ONE THOUSAND, THREE HUNDRED DOLLARS (\$21,300.00) may be made in up to 4 payments for complete payment of the entire civil penalty including interest. Including the civil penalty and interest, the total amount that will be paid upon completion of all payments will be \$21,379.00. The first payment is due within thirty (30) days of the effective date of this CA/FO, which is upon its filing with the Regional Hearing Clerk. Respondent's subsequent payments shall thereafter be due within 90-day intervals from said effective date. Respondent shall make payments in accordance with the following schedule:

Payment Number	Payment shall be made no later than	Payment Amount
1	Thirty (30) calendar days following the effective date of this CA/FO.	U.S. \$ 5,344.96
2	Ninety (90) calendar days following the effective date of this CA/FO.	U.S. \$ 5,344.96
3	One hundred and eighty (180) calendar days following the effective date of this CA/FO.	U.S. \$ 5,344.96
4	Two hundred and seventy (270) calendar days following the effective date of this CA/FO	U.S. \$ 5,344.96

b. With regards to the alleged violations at Chevron Food Mart. a civil penalty in the amount of EIGHTEEN THOUSAND, FIVE HUNDRED AND THIRTY SIX DOLLARS (\$18,536.00) may be made in up to 4 payments for complete payment of the entire civil penalty including interest. Including the civil penalty and interest, the total amount that will be paid upon completion of all payments will be \$18,605.00. The first payment is due within thirty (30) days of the effective date of this CA/FO, which is upon its filing with the Regional Hearing Clerk. Respondent's subsequent payments shall thereafter be due within 90-day intervals from said effective date. Respondent shall make payments in accordance with the following schedule:

Payment Number	Payment shall be made no later than	Payment Amount
1	Thirty (30) calendar days following the effective	U.S. \$

	date of this CA/FO.	4,651.37
2	U.S. \$ 4,651.37	U.S. \$
		4,651.37
3	One hundred and eighty (180) calendar days	U.S. \$
	following the effective date of this CA/FO.	4,651.37
4	Two hundred and seventy (270) calendar days	U.S. \$
	following the effective date of this CA/FO	4,651.37

- c. With regards to the alleged violations at Canton Food Mart, a civil penalty in the amount of ONE THOUSAND, NINE HUNDRED AND SEVENTEEN DOLLARS (\$1,917.00), which is to be paid within thirty (30) calendar days of the effective date of this CA/FO.
- d. With regards to the alleged violations at Riverstone Texaco, a civil penalty in the amount of THREE THOUSAND, FOUR HUNDRED AND THIRTY SIX DOLLARS (\$3,436.00), which is to be paid within thirty (30) calendar days of the effective date of this CA/FO.
- 49. If Respondent fails to make one of the installment payments in accordance with the schedule set forth above, the entire unpaid balance of the penalty and all accrued interest shall become due immediately upon such failure, and Respondent shall immediately pay the entire remaining principal balance of the civil penalty along with any interest that has accrued up to the time of such payment. In addition, Respondent shall be liable for and shall pay administrative handling charges and late payment penalty charges as described below in the event of any such failure or default.
- 50. Further, if Respondent fails to pay the installment payments in accordance with the schedule set forth above, EPA may refer the debt to a collection agency, a credit reporting agency, or to the Department of Justice for filing of a collection action in the appropriate United States District Court. In any such collection action, the validity, the amount, and appropriateness of the assessed penalty and of this CA/FO shall not be subject to review.
- 51. Notwithstanding, Respondent's agreement to pay the assessed civil penalty in accordance with the installment schedule set forth above, Respondent may pay the entire civil penalty of **FORTY FIVE THOUSAND, ONE HUNDRED EIGHTY NINE DOLLARS** (\$45,189.00) within thirty (30) calendar days after the date on which a copy of this CA/FO is mailed or hand delivered to Respondent and, thereby, avoid the payment of interest pursuant to 40 C.F.R. § 13.11(a). In addition, Respondent may, at any time after commencement of payments under the installment schedule, elect to pay the entire principal balance remaining, together with interest accrued up to the date of such full payment.
- 52. Payment shall be made by cashier's or certified check, by electronic funds transfer (EFT), or by Automated Clearing House (ACH) (also known as REX or remittance express). If paying by check, the check shall be payable to: **Treasurer**, **United States of America**.

Respondent's name and the docket number for this matter shall be referenced on the face of the check. If Respondent sends payment by the U.S. Postal Service, payment shall be sent to:

United States Environmental Protection Agency Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

If Respondent sends payment by non-U.S. Postal express mail delivery, the payment shall be sent to:

U.S. Bank Government Lockbox 979077 U.S. EPA Fines and Penalties 1005 Convention Plaza Mail Station SL-MO-C2GL St. Louis, Missouri 63101 (314) 418-1028

If paying by ACH, Respondent shall remit payment to:

PNC Bank
ABA: 051036706
Account Number: 310006
CTX Format Transaction Code 22 - checking
Environmental Protection Agency
808 17<sup>th</sup> Street, NW
Washington, D.C. 20074
Contact: Jessee White, (301) 887-6548

53. Respondent shall submit a copy of the payment to:

Patricia A. Bullock Regional Hearing Clerk U.S. Environmental Protection Agency, Region 4 Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, Georgia 30303

and to:

William E. Truman

Chief, Underground Storage Tank Section
U.S. Environmental Protection Agency, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303

- 54. If Respondent fails to remit the civil penalty as agreed to herein, EPA is required to assess interest, penalties, and a charge to cover the costs of processing and handling the delinquent claim. Interest, at the statutory judgment rate provided for in 31 U.S.C. § 3717, will begin to accrue on the civil penalty if not paid as specified above. Pursuant to 31 U.S.C. § 3717, Respondent must pay the following amounts on any amount overdue:
  - (a) Interest. Any unpaid portion of a civil penalty or stipulated penalty must bear interest at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Interest will therefore begin to accrue on a civil penalty or stipulated penalty if it is not paid by the last date required. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 4 C.F.R. § 102.13(c).
  - (b) Monthly Handling Charge. Respondent must pay a late payment handling charge of \$15.00 on any late payment, with an additional charge of \$15.00 for each subsequent thirty (30) calendar-day period over which an unpaid balance remains.
  - (c) Non-Payment Penalty. On any portion of a civil penalty or stipulated penalty more than ninety (90) calendar days past due, Respondent must pay a non-payment penalty of six percent (6%) per annum, which will accrue from the date the penalty payment became due and is not paid. This non-payment is in addition to charges which may accrue under subparagraphs (a) and (b).
- 55. Penalties paid pursuant to this CA/FO are not tax deductible under 26 U.S.C. § 62(f).

#### VII. PARTIES BOUND

- 56. This CA/FO shall be binding upon Respondent and its successors and assigns. Respondent shall cause its officers, directors, employees, agents, and all persons, including independent contractors, contractors, and consultants acting under or for Respondent, to comply with the provisions hereof in connection with any activity subject to this CA/FO.
- 57. No change in ownership, partnership, corporate, or legal status relating to the Facilities will in any way alter Respondent's obligations and responsibilities under this CA/FO.
- 58. The undersigned representative of Respondent hereby certifies that she or he is fully authorized to enter into this CA/FO and to execute and legally bind Respondent to it.

## VIII. RESERVATION OF RIGHTS

- 59. Notwithstanding any other provision of this CA/FO, an enforcement action may be brought pursuant to Section 9003(h) of RCRA, 42 U.S.C. § 6991b(h), or other statutory authority, should EPA find that the release of regulated substances from a UST may have occurred and implementation of any corrective action is needed to address such release.
- 60. Complainant reserves the right to take enforcement action against Respondent for any future violations of RCRA or GUSTA and their implementing regulations and to enforce the terms and conditions of this CA/FO.
- 61. Except as provided above, nothing in this CA/FO shall constitute a release from any claim (civil or criminal), cause of action, or demand in law or equity for any liability Respondent may have arising out of or relating in any way to Respondent's management of the USTs located at the Facilities.
- 62. This CA/FO may be amended or modified only by written agreement executed by both EPA and Respondent.
- 63. The provisions of this CA/FO shall be deemed satisfied when Respondent has fully fulfilled the payment and certification obligations required by this CA/FO.

## IX. OTHER APPLICABLE LAWS

58. All actions required to be taken pursuant to this CA/FO shall be undertaken in accordance with the requirements of all applicable laws and regulations. Respondent shall obtain or cause its representatives to obtain all necessary permits and approvals as required.

## X. SERVICE OF DOCUMENTS

59. A copy of any legal documents that Respondent files in this action should be sent to the following attorney who represents EPA in this matter and who is authorized to receive service for EPA in this proceeding:

Roberto X. Busó Associate Regional Counsel U.S. Environmental Protection Agency, Region 4 Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, Georgia 30303

### XI. SEVERABILITY

60. It is the intent of the parties that the provisions of this CA/FO are severable. If

any provision or authority of this CA/FO or the application of this CA/FO to any party or circumstance 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 CA/FO shall remain in force and shall not be affected thereby.

## XII. EFFECTIVE DATE

61. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

## AGREED AND CONSENTED TO:

Majors Management LLC.

Respondent

By: Can C. Moon

T. Moon Dated: 6/27/14

Print Tixle: Can A. M

U.S. Environmental Protection Agency, Complainant

By:

G Alan Farmer, Director

RCRA Division
U.S. EPA, Region 4

Dated: 9-11-14

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 4

IN THE MATTER OF:	) Docket No.: RCRA-UST-04-2014-0001
Majors Management, LLC. Post Office Box 1565	) Proceeding under Section 9006 ) of the Resource Conservation
Lawrenceville, Georgia 30046	) and Recovery Act, as amended ) 42 U.S.C. § 6991e
RESPONDENT.	) ) )

## **FINAL ORDER**

The foregoing Consent Agreement is 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 (Consolidated Rules of Practice), 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 Order disposes of matters under RCRA Subtitle I pursuant to 40 C.F.R. §§ 22.18 and 22.31.

BEING AGREED, IT IS SO ORDERED this /8 day of \_\_\_\_\_\_, 2014.

BY:

Susan B. Schub

Regional Judicial Officer

United States Environmental Protection Agency, Region 4

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Consent Agreement and the attached Final Order (CA/FO), in the Matter of Majors Management LLC. Docket Number: RCRA-UST-04-2014-0001, on the parties listed below in the manner indicated:

Roberto X. Busó, Associate Regional Counsel U.S. Environmental Protection Agency Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, Georgia 30303 (Via EPA's internal mail)

Quantindra Smith RCRA Division U.S. Environmental Protection Agency Sam Nunn Atlanta Federal center 61 Forsyth Street, S.W. Atlanta, Georgia 30303 (Via EPA's internal mail)

Majors Management LLC. Post Office Box 1565 Lawrenceville, Georgia 30046 (Via Certified Mail- Return Receipt Requested)

Jason A. Wiles, P.L. 1114 East 5th Avenue Tallahassee, FL 32303 (Via Certified Mail- Return Receipt Requested)

Date 9-18-14

Patricia Bullock, Regional Hearing Clerk U.S. Environmental Protection Agency Atlanta Federal Center 61 Forsyth Street, SW Atlanta, Georgia 30303

(404) 562-9511