

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 RENNER BLVD
LENEXA, KANSAS 66219

2014 OCT 30 AM 8:38

IN THE MATTER OF:)
)
Tect Aerospace Wellington Inc.)
)
1515 North A Street)
Wellington, Kansas)
)
And)
)
102 West Hillside)
Wellington, Kansas)
)
RCRA I.D. No. KS0001006410)
KSD980633366)
)
Respondent.)
)
Proceeding under Section 3008(a) and (g) of)
the Resource Conservation and Recovery)
Act as amended, 42 U.S.C. § 6928(a) and (g))
)
_____)

**CONSENT AGREEMENT
AND FINAL ORDER**

Docket No. RCRA-07-2014-0032

The United States Environmental Protection Agency (EPA), Region 7 (Complainant) and Tect Aerospace Wellington Inc. (Respondent) have agreed to a settlement of this action before the filing of a complaint, and thus this action is simultaneously commenced and concluded pursuant to Rules 22.13(b) and 22.18(b)(2) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits (Consolidated Rules of Practice), 40 Code of Federal Regulations (C.F.R.) §§ 22.13(b) and 22.18(b)(2).

Section I

Jurisdiction

1. This administrative action is being conducted pursuant to Sections 3008(a) and (g) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA or the Act), and the Hazardous and Solid Waste Amendments of 1984 (HSWA), 42 U.S.C. § 6928(a) and (g), and in accordance with the Consolidated Rules of Practice. The authority has been delegated by the Administrator of EPA to the Regional Administrator and further delegated to the Director of the Air and Waste Management Division.

2. This Consent Agreement and Final Order (CA/FO) serves as notice that the EPA has reason to believe that Respondent violated Section 3005 of RCRA, 42 U.S.C. § 6925.

Section II

Parties

3. The Complainant is the Chief of the Waste Enforcement Materials Management Branch in the Air and Waste Management Division of EPA, Region 7, who has been duly delegated the authority to bring this action by the Administrator of EPA.

4. The Respondent is Tect Aerospace Wellington Inc., a company registered to do business in Kansas. The Settlement Agreement addresses the Tect Aerospace facility located at 1515 North A Street in Wellington, KS (Tect-1515 facility) and the Tect Aerospace facility located at 102 West Hillside in Wellington, KS (Tect-102 facility).

Statutory and Regulatory Framework

5. The State of Kansas has been granted authorization to administer and enforce a hazardous waste program pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, and the State of

Kansas has adopted by reference the federal regulations cited herein at pertinent parts of Title 28, Article 31 of the Kansas Administrative Regulations (hereinafter K.A.R. 28-31). Section 3008 of RCRA, 42 U.S.C. § 6928, authorizes the EPA to enforce the provisions of the authorized State program and the regulations promulgated thereunder. When the EPA determines that any person has violated or is in violation of any RCRA requirement, EPA may issue an order assessing a civil penalty for any past or current violation and/or require immediate compliance or compliance within a specified time period pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. In the case of a violation of any RCRA requirement, where such violation occurs in a state which is authorized to implement a hazardous waste program pursuant to Section 3006 of RCRA, EPA shall give notice to the state in which such violation has occurred or is occurring prior to issuing an order. The State of Kansas has been notified of this action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

6. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes a civil penalty of not more than \$25,000 per day for violations of Subchapter III of RCRA (Hazardous Waste Management). This figure has been adjusted upward for inflation pursuant to the Civil Monetary Penalties Inflation Adjustment Rule, 40 C.F.R. Part 19, so that penalties of up to \$32,500 per day are now authorized for violations of Subchapter III of RCRA that occur after March 15, 2004 though January 12, 2009. For violations of Subchapter III of RCRA that occur after January 12, 2009, penalties of up to \$37,500 per day are now authorized. Based upon the facts alleged in this Consent Agreement and Final Order and upon those factors which Complainant must consider pursuant to Section 3008(a)(3) of RCRA, 42U.S.C. § 6928(a)(3), as discussed in the RCRA Civil

Penalty Policy issued by EPA in June 2003, the Complainant and Respondent agree to the payment of a civil penalty pursuant to Section 3008(g) or RCRA, 42 U.S.C. § 6928(g), and to take the actions required by the Final Order, for the violations of RCRA alleged in this Consent Agreement and Final Order

General Factual Allegations of EPA

7. Respondent is a corporation authorized to conduct business in the State of Kansas and is a “person” as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

8. Respondent has four facilities located in Wellington, KS. The manufacturing processes at the four facilities are interconnected. The Tect-1515 facility is a machining facility involved in manufacturing airplane frame parts. This involves machining parts (including CNC (computerized) and conventional (manual) cutting, sawing and hand grinding/polishing), assembling parts (including fastening and applying adhesives), inspecting parts, shipping some parts to Tect-102 to be shipped to customers, sending some parts off-site to another company for processing (including etching, painting and penetrate inspecting) and receiving parts back from off-site processing for additional machining. The Tect-102 facility is a fabrication facility involved in manufacturing airplane frame parts. This involves machining parts (including CNC and conventional cutting, sawing, hand grinding/polishing and bending), heat treating parts in a salt bath, assembling parts (fastening, applying adhesives and welding), inspecting parts, shipping some parts to customers, sending some parts off-site to another company for processing (including etching, painting and penetrate inspecting), and receiving parts back from off-site processing for additional machining.

9. Based on a review of the Inspection Report and the information provided during and following the 2011 CEI by facility personnel, it was determined that the TECT-1515 facility was generating D001, D004, D005, D006, D007, D008, D035, D039, D040, F003 and F005 hazardous waste. Tect-1515 is also a used oil generator and a small quantity handler of universal waste.

10. Based on a review of the Inspection Report and the information provided during and following the 2011 CEI by facility personnel, it was determined that the TECT-102 facility was generating D001, D002, D005, D006, D007, D018, D035, D039, D040, F003 and F005 hazardous waste. Tect-102 is also a used oil generator and a small quantity handler of universal waste.

11. The regulations for determining whether a waste is a solid and/or hazardous waste are set forth at K.A.R. 28-31-1(a)(2) and (3), which incorporate by reference the regulations at 40 C.F.R. Parts 260 and 261. Each of the wastes listed in paragraph 9 and 10 is a "solid waste" and all of the wastes except the used oil and universal waste are also "hazardous wastes" within the meaning of these regulations.

12. On or about November 15 - 17, 2011, an EPA inspector conducted a RCRA Compliance Evaluation Inspection at Respondent's Tect-1515 and Tect-102 facilities (2011 CEI). EPA requested and received from Respondent additional information relevant to the issues identified by the EPA inspector during the Inspection.

13. Respondent had filed a notification of hazardous waste activity. The TECT-1515 facility notified as a Kansas generator of hazardous waste as defined at KAR 28-31-2 (d).

14. The TECT-102 facility notified as a Kansas generator of hazardous waste as defined at KAR 28-31-2 (d). However, at the time of the 2011 CEI it was determined that Tect-102 was generating less than 25kg of waste per month. Therefore at the time of the 2011 CEI, the inspector inspected the Tect-102 as a small quantity generator as defined at KAR 28-31-2 (e).

15. Respondent has been assigned RCRA facility identification numbers of KS0001006410 for TECT-1515 and KSD980633366 for TECT-102.

Violations

16. Complainant hereby states and alleges that Respondent has violated RCRA and federal and state regulations promulgated thereunder, as follows:

Count 1

Failure to Perform Hazardous Waste Determination

17. The allegations stated in paragraphs 7 through 15 are realleged and incorporated as if fully set forth herein.

18. K.A.R. 28-31-4(b) requires generators of solid waste to perform hazardous waste determinations using methods prescribed in the regulations.

19. At the time of the 2011 CEI, Respondent had been generating multiple solid waste streams at the Tect-1515 and Tect-102 facilities. The Tect-151 facility was generating waste streams including spent metal halide lamps, high pressure sodium lamps, spent batteries, and spent ink jet make-up fluid. The Tect-102 facility was generating waste streams including spent metal halide lamps, lab waste, and approximately 60 containers of unknown chemicals in the Back Room.

20. At the time of the 2011 CEI inspection, Respondent had not conducted a hazardous waste determination on the solid waste streams noted in paragraph 18.

21. Respondent's failure to make a hazardous waste determination on the above referenced waste streams is a violation of 40 C.F.R. § 262.11 and K.A.R. 28-31-4(b).

Count 2

**Operation of a Hazardous Waste Treatment, Storage or Disposal Facility
Without a Permit**

22. The allegations stated in paragraphs 7 through 15 are realleged and incorporated as if fully set forth herein.

23. Section 3005 of RCRA and Section 65-3437 of the Kansas Statutes, Annotated (K.S.A.) require each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste identified or listed under Subchapter C of RCRA to have a permit for such activities.

Failure to Comply with Generator Requirements

24. The regulations at K.A.R. 28-31-4 (h) state that Kansas generators may accumulate hazardous waste in containers on-site for ninety (90) days without a permit or without interim status, provided certain conditions are met. These conditions include compliance with other hazardous waste regulatory requirements.

25. The regulations at K.A.R. 28-31-4 (m)(2) state how small quantity generators who accumulate 25 kilograms or more of hazardous waste shall handle such waste and also state that such generators shall be subject to the requirements listed in (m)(2)(A), (m)(2)(B), and

(m)(2)(C).

26. At the time of the 2011 CEI, the Tect-102 facility, a small quantity generator, had accumulated more than 25 kilograms of hazardous waste.

27. The Tect-102 facility's accumulation of more than 25 kilograms of waste requires the Tect-102 facility to comply with K.A.R. 28-31-4 (m)(2)(B) which refers to K.A.R. 28-31-4(k) and with K.A.R. 28-31-4 (m)(2)(C) which refers to K.A.R. 28-31-4 (h)(2), (3), and (4).

28. At the time of the 2011 CEI, Respondent was not complying with the following regulatory requirements:

*Conduct and Document Weekly Inspections of Hazardous Waste
Container Storage Area*

29. As a small quantity generator accumulating more than 25 kilograms of hazardous waste, Tect-102 was subject to the requirements of K.A.R. 28-31-4 (m)(2)(C). K.A.R. 28-31-4 (m)(2)(C) requires compliance with K.A.R. 28-31-4(k).

30. KAR 28-31-4(k) referencing 40 CFR 262.34(c)(2) referencing 265.174, requires that Kansas generators of hazardous waste document weekly inspections of their hazardous waste storage areas.

31. At the Tect-1515 facility, Respondent failed to document weekly inspections of one full 55-gallon container of unpunctured aerosol cans and the area it where it was stored.

32. At the Tect-102 facility, Respondent failed to document weekly inspections on three 55-gallon hazardous waste containers and the area, Building 7, where they were being stored.

*Mark Waste Accumulation Containers with the Date
Accumulation Began*

33. As a small quantity generator accumulating more than 25 kilograms of hazardous waste, Tect-102 was subject to the requirements of K.A.R. 28-31-4 (m)(2)(B). K.A.R. 28-31-4 (m)(2)(B) requires compliance with K.A.R. 28-31-4(h)(3).

34. The regulations at 40 C.F.R. § 262.34(a)(2) and KAR 28-31-4(h)(3) require that a Kansas generator must clearly mark the date upon which the period of accumulation begins for each container of hazardous waste.

35. At the time of the 2011 CEI at the Tect-1515 facility, Respondent had failed to mark the accumulation start date on one full 55-gallon container of unpunctured aerosol cans located in Building 18.

36. At the time of the 2011 CEI at the Tect-102 facility, Respondent had failed to mark the accumulation start date on three 55-gallon hazardous waste containers being stored in Building 7; one undated 55-gallon container containing aerosol liquid located in the hazardous waste container accumulation area shed; and two 55-gallon containers containing assembly/paint debris located in the area next to the paint booth.

Label Containers of Hazardous Waste with the Words "Hazardous Waste"

37. As a small quantity generator accumulating more than 25 kilograms of hazardous waste, Tect-102 was subject to the requirements of K.A.R. 28-31-4 (m)(2)(B). K.A.R. 28-31-4 (m)(2)(B) requires compliance with K.A.R. 28-31-4(h)(4).

38. The regulations at 40 C.F.R. § 262.34(a)(3) and KAR 28-31-4(h)(4) require that while being accumulated on-site by a Kansas generator, each container and tank be marked clearly with the words, "Hazardous Waste."

39. At the time of 2011 CEI at the Tect-102 facility, Respondent failed to label two hazardous waste containers, containing assembly/paint debris, located in the accumulation area next to the paint booth with the words "Hazardous Waste."

Close Hazards Waste Accumulation Containers

40. As a small quantity generator accumulating more than 25 kilograms of hazardous waste, Tect-102 was subject to the requirements of K.A.R. 28-31-4 (m)(2)(B). K.A.R. 28-31-4 (m)(2)(B) requires compliance with K.A.R. 28-31-4(h)(2).

41. The regulations at 40 CFR 265.173(a) and KAR 28-31-4(h)(2)(A) require that a Kansas generator keep hazardous waste accumulation containers closed during storage, except when it is necessary to add or remove waste.

42. At the time of the 2011 CEI at the Tect-102 facility, Respondent failed to close two containers of assembly/paint debris located in the accumulation area next to the paint booth.

Failure to Post Emergency Information

43. The regulations at 40 CFR 262.34(d)(5)(ii) and KAR 28-31-4(h)(7)(A), (B), and (C) require that emergency information, including the emergency coordinator's name and number, location of emergency equipment, and fire department's number are posted next to at least one telephone that is accessible, with little or no delay, by employees during an emergency.

44. At the time of the 2011 CEI at the Tect-1515 facility, Respondent had failed to

post the required emergency information next to the closest land-line phone to the hazardous waste accumulation area shed.

Access to Communications or Alarm Systems

45. The regulations at 40 CFR 265.34(a) and KAR 28-31-4(h)(5) require whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

46. At the time of the 2011 CEI at the Tect-1515 facility, Respondent failed to provide immediate access to an internal alarm or emergency communication device in the hazardous waste accumulation area shed.

Arrangements with Local Authorities

47. The regulations at 40 CFR 265.37(a)(1) and KAR 28-31-4(h)(5) require the owner or operator to attempt to make the arrangements with police, fire departments, and emergency response teams, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations.

48. At the time of the 2011 CEI at the Tect-1515 facility, Respondent failed to make required arrangement with the police.

49. Respondent has never obtained a permit to operate a hazardous waste treatment, storage or disposal facility pursuant to Section 3005 of RCRA and KSA Section 65-3437.

50. Respondent's failure to comply with the generator requirements above constitutes the operation of a hazardous waste treatment, storage, or disposal facility (TSD) without a permit, in violation of Section 3005 of RCRA and KSA Section 65-3437.

51. Therefore, Respondent is in violation of Section 3005 of RCRA, 42 U.S.C. § 6925, and K.S.A. 65-3437.

Count 3

Storage of Restricted Waste

52. The allegations stated in paragraphs 7 through 15 are realleged and incorporated as if fully set forth herein.

53. The regulations at 40 CFR 268.50(c) and KAR 28-31-14 prohibit an owner/operator of a treatment, storage or disposal facility to store wastes restricted from land disposal under subpart C of RCRA section 3004 beyond one year unless the owner/operator can prove that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal.

54. At the 2011 CEI for the Tect-102 facility, Respondent had been storing four 55-gallon hazardous waste containers of liquid paint waste, assembly/paint debris, and expired sealant in Building 7 for over one year.

55. The wastes listed in paragraph 54 were wastes restricted from land disposal under subpart C of RCRA section 3004.

56. Respondent did not prove that these wastes were stored beyond one year solely for the purpose of accumulation of such quantities of hazardous waste as were necessary to

facilitate proper recovery, treatment, or disposal.

57. Respondent's storage of these wastes beyond one year without proving that said storage was solely for the purpose of accumulation of such quantities of hazardous waste as were necessary to facilitate proper recovery, treatment, or disposal means that these is a violation of 40 CFR 268.50(c) and KAR 28-31-14.

CONSENT AGREEMENT

1. Respondent and EPA agree to the terms of this Consent Agreement and Final Order (CA/FO) and Respondent agrees to comply with the terms of the Final Order portion of this CA/FO.

2. Respondent admits the jurisdictional allegations of this CA/FO and agrees not to contest EPA's jurisdiction in this proceeding or any subsequent proceeding to enforce the terms of the Final Order portion of this CA/FO set forth below.

3. Respondent neither admits nor denies the factual allegations and legal conclusions set forth in this CA/FO.

4. Respondent waives its right to a judicial or administrative hearing on any issue of fact or law set forth above, and its right to appeal the proposed Final Order portion of the CA/FO.

5. Respondent and Complainant agree to settle the matters set forth in this CA/FO without the necessity of a formal hearing and to bear their respective costs and attorneys' fees.

6. This CA/FO constitutes a settlement of all civil administrative claims for the RCRA violations identified above. Complainant reserves the right to take any enforcement action with respect to any other violations of RCRA or any other applicable law.

7. Nothing contained in the Final Order portion of this CA/FO shall alter or otherwise affect Respondent's obligation to comply with all applicable federal, state, and local environmental statutes and regulations and applicable permits.

8. The undersigned representative of Respondent certifies that he or she is fully authorized to enter the terms and conditions of this CA/FO and to execute and legally bind Respondent to it.

9. Respondent agrees that, in settlement of the claims alleged in this CA/FO, Respondent shall pay a penalty of fifty thousand dollars (\$50,000.00) as set forth in Paragraph 1 of the Final Order.

10. Respondent understands that failure to pay any portion of the civil penalty on the date the same is due may result in the commencement of a civil action in Federal District Court to collect said penalty, along with interest thereon at the applicable statutory rate.

11. This CA/FO shall be effective upon entry of the Final Order by the Regional Judicial Officer for EPA, Region 7. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

12. This CA/FO shall remain in full force and effect until Complainant provides Respondent with written notice, in accordance with Paragraph 19 of the Consent Agreement, that all requirements hereunder have been satisfied.

13. Respondent shall ensure that all contractors, employees, consultants, firms, or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this CA/FO.

Reservation of Rights

14. Notwithstanding any other provision of this CA/FO, EPA reserves the right to enforce the terms of the Final Order portion of this CA/FO by initiating a judicial or administrative action under Section 3008 of RCRA, 42 U.S.C. § 6928, and to seek penalties against Respondent in an amount not to exceed Thirty-seven Thousand Five Hundred Dollars (\$37,500) per day per violation pursuant to Section 3008(c) and/or Section 3008(g) of RCRA, for each day of non-compliance with the terms of the Final Order, or to seek any other remedy allowed by law.

15. Complainant reserves the right to take enforcement action against Respondent for any future violations of RCRA and its implementing regulations and to enforce the terms and conditions of this CA/FO.

16. Except as expressly provided herein, nothing in this CA/FO shall constitute or be construed as a release from any claim (civil or criminal), cause of action, or demand in law or equity by or against any person, firm, partnership, entity, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous constituents, hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken from Respondent's facility.

17. Notwithstanding any other provisions of the CA/FO, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority, should EPA find that the future handling, storage, treatment, transportation, or disposal of solid

waste or hazardous waste at Respondent's facility may present an imminent and substantial endangerment to human health and the environment.

18. The headings in this CA/FO are for convenience of reference only and shall not affect interpretation of this CA/FO.

19. The provisions of this CA/FO shall be deemed satisfied upon a written determination by Complainant that Respondent has fully implemented the actions required in the Final Order.

FINAL ORDER

Pursuant to the authority of Section 3008(a) and (g) of RCRA, 42 U.S.C. § 6928(a) and (g), and according to the terms of this CA/FO, IT IS HEREBY ORDERED THAT:

A. Payment of Civil Penalty

1. Within thirty (30) days of the effective date of this CA/FO, Respondent will pay a civil penalty of fifty thousand dollars (\$50,000.00). Such payment shall identify Respondent by name and docket number and shall be by certified or cashier's check made payable to the "United States Treasury" and sent to:

US Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
PO Box 979077
St. Louis, MO 63197-9000

2. Wire transfers should be directed to the Federal Reserve Bank of New York:

Federal Reserve Bank of New York
ABA = 021030004
Account = 68010727

SWIFT address = FRNYUS33
33 Liberty Street
New York, NY 10045

Field Tag 4200 of the Fedwire message should read
“D 68010727 Environmental Protection Agency”

3. A copy of the payment documentation shall also be mailed to EPA’s representative identified in paragraph 6 below, and to:

Regional Hearing Clerk
U.S. EPA Region 7
11201 Renner Blvd
Lenexa, KS 66219

And to:

Jennifer Trotter/CNSL
U.S. EPA Region 7
11201 Renner Blvd
Lenexa, KS 66219

4. No portion of the civil penalty or interest paid by Respondent pursuant to the requirements of this CA/FO shall be claimed by Respondent as a deduction for federal, state, or local income tax purposes.

B. Compliance Actions

5. Within sixty (60) days of the effective date of the Final Order, Respondent shall:
- a. At each facility that generates hazardous waste, create a Standard Operating Procedure (SOP) for making hazardous waste determinations and provide each copy to EPA.
 - b. Create an inventory of all solid wastes generated for each facility that generates hazardous waste, with appropriate hazardous waste determinations.
 - c. Provide a list of the employees who require annual RCRA training and a copy of each facility’s training plan for each facility that generates hazardous waste. Also provide

documentation that the employees contained within the list(s) have been trained.

- d. Demonstrate how inspections and container management practices have been improved to eliminate container and storage violations in the future, such as an improved SOP, for each facility that generates hazardous waste.

6. On a quarterly basis for a period of one year, beginning no later than sixty (60) days after the effective date of this order, Respondent shall:

- a. provide photographic documentation that accumulation containers are closed, labeled, dated and managed according to the regulations for each facility that generates hazardous waste as follows: Both facilities are notified and operating as SQG's. Photos of satellite accumulation containers and less than 180 day hazardous waste storage containers will be done in the following areas: the Pylon Cell at the Machining site, the Satellite area beside the paint booth at the Fabrication Site, and all less than 180 day hazardous waste storage areas. The photos will be digitally taken and transposed to a pdf. There will be two photos per area. For satellite accumulation containers, one photo will be an up-close photo of a container label showing that it is labeled as hazardous waste. The second photo will be a photo showing the entire container and that it is properly labeled and closed. For less than 180 day hazardous waste storage containers, one photo will be an up-close photo of a container label showing that it is properly labeled as hazardous waste and dated. The second photo will be a photo showing the entire container and that it is properly labeled, dated and closed. The photos will be electronically forwarded to Nicole Moran.

All compliance documentation required under this section shall be sent to:

Nicole Moran

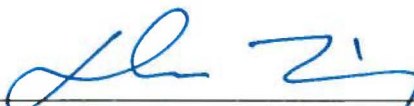
IN THE MATTER OF TECT AEROSPACE WELLINGTON INC.
Docket No. RCRA-07-2014-0032

Air and Waste Management Division
Waste Enforcement and Materials Management Branch
U.S. EPA Region 7
11201 Renner Blvd
Lenexa, KS 66219

FOR COMPLAINANT:
U.S. ENVIRONMENTAL PROTECTION AGENCY

10-27-14

Date



Donald Toensing
Chief, RCRA Enforcement and State Programs Branch
Air and Waste Management Division
U.S. Environmental Protection Agency
Region 7

10-27-14

Date



Jennifer Trotter
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 7

FOR RESPONDENT
Tect Aerospace Wellington, Inc.

OCT 14, 2014

Date

Scott F. Burdick

Printed Name

Signature

A handwritten signature in blue ink, appearing to read 'SFB', is written over a horizontal line.

IT IS SO ORDERED. This Final Order is effective upon its final entry by the Regional Judicial Officer.

10-30-14
Date

Karina Borromeo
Karina Borromeo
Regional Judicial Officer

IN THE MATTER OF Tect Aerospace Wellington Inc., Respondent
Docket No. RCRA-07-2014-0032

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Order was sent this day in the following manner to the addressees:

Copy by email to Attorney for Complainant:

trotter.jennifer@epa.gov

Copy by First Class Mail to:

Mr. Efflandt
FOULSTON SIEFKIN LLP
Attorneys at Law
1551 N. Waterfront Parkway, Suite 100
Wichita, Kansas 67206-4466

Dated: 10/30/14



Kathy Robinson
Hearing Clerk, Region 7