

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103**

In the Matter of:

**Clean Harbors Laurel, LLC
3527 Whiskey Bottom Road
Laurel, MD 20724**

Respondent.

**Clean Harbors Laurel, LLC
3527 Whiskey Bottom Road
Laurel, MD 20724**

Facility.

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:
: **U.S. EPA Docket No. RCRA-03-2020-0136**
:
: **Proceeding under Section 3008(a) and (g) of the**
: **Resource Conservation and Recovery Act, as**
: **amended, 42 U.S.C. § 6928(a) and (g)**
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CONSENT AGREEMENT

PRELIMINARY STATEMENT

1. This Consent Agreement is entered into by the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region III (“Complainant”) and Clean Harbors Laurel, LLC (“Respondent”) (collectively the “Parties”), pursuant to Section 3008(a) and (g) of the Resource Conservation and Recovery Act (“RCRA” or the “Act”), as amended, 42 U.S.C. § 6928(a) and (g), and 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. Section 3008(a) of RCRA authorizes the Administrator of the U.S. Environmental Protection Agency (“EPA” or the “Agency”) to assess penalties and undertake other actions required by this Consent Agreement. The Administrator has delegated this authority to the Regional Administrator who, in turn, has delegated it to the Complainant. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes the assessment of a civil monetary penalty against any person who violates any requirement of RCRA Subtitle C, EPA’s regulations thereunder, or any regulation of a state hazardous waste program which has been authorized by EPA. This Consent Agreement and the attached Final Order (hereinafter jointly referred to as the “Consent Agreement and Final Order”) resolve Complainant’s civil penalty claims against Respondent under RCRA for the violations alleged herein.

2. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant hereby simultaneously commences and resolves this administrative proceeding.

JURISDICTION

3. The U.S. Environmental Protection Agency has jurisdiction over the above-captioned matter, as described in Paragraph 1, above.
4. The Consolidated Rules of Practice govern this administrative adjudicatory proceeding pursuant to 40 C.F.R. § 22.1(a)(4).
5. On February 11, 1985, pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), and 40 C.F.R. Part 271, Subpart A, EPA granted the State of Maryland final authorization to administer its hazardous waste management program regulations (“MdHWMR”) set forth at the Code of Maryland Regulations (“COMAR”), Title 10, Subtitle 51 et seq., in lieu of the federal hazardous waste management program established under RCRA Subtitle C, 42 U.S.C. §§ 6921-6939e. Through this final authorization, the provisions of the MdHWMR became requirements of RCRA Subtitle C and are, accordingly, enforceable by EPA on and after that date pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a). EPA authorized revisions to the Maryland hazardous waste management program set forth at COMAR, Title 26, Subtitle 13 effective on July 31, 2001, September 24, 2004, and on October 31, 2016, and, accordingly, the provisions of the revised MdHWMR are enforceable by EPA on and after those dates pursuant to § 3008(a) of RCRA, 42 U.S.C. § 6928(a). Maryland has not sought authorization to implement the federal universal waste regulations applicable to spent lamps. Therefore, in Maryland, waste lamps are regulated as hazardous waste, with the characteristic of toxicity for mercury (D009).
6. On February 15, 2019, EPA sent a letter to the State of Maryland, through the Maryland Department of the Environment (“MDE”), giving prior notice of this action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

GENERAL PROVISIONS

7. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this Consent Agreement and Final Order.
8. Except as provided in Paragraph 7, above, Respondent neither admits nor denies the specific factual allegations set forth in this Consent Agreement.
9. Respondent agrees not to contest the jurisdiction of EPA with respect to the execution of this Consent Agreement, the issuance of the attached Final Order, or the enforcement of this Consent Agreement and Final Order.

10. For purposes of this proceeding only, Respondent hereby expressly waives its right to contest the allegations set forth in this Consent Agreement and Final Order and waives its right to appeal the accompanying Final Order.
11. Respondent consents to the assessment of the civil penalty stated herein, to the issuance of any specified compliance order herein, and to any conditions specified herein.
12. Respondent shall bear its own costs and attorney's fees in connection with this proceeding.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

13. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant alleges and adopts the Findings of Fact and Conclusions of Law set forth immediately below.
14. Respondent's facility is located at 3527 Whiskey Bottom Road, Laurel, Maryland 20724 ("Facility"). At the Facility, Respondent operates hazardous waste and non-hazardous waste transportation services. It is situated on about 3.75 acres and has building area of 34,760 square feet. At the time of the inspection, Respondent had a RCRA Controlled Hazardous Substances permit number A-207 ("Permit" or "the Permit"), which allows it to operate a hazardous waste transfer facility.
15. Respondent is a Corporation organized under the laws of the Commonwealth of Massachusetts.
16. Respondent's waste management operations primarily consist of the transfer and consolidation of hazardous waste containers into trucks for transport. This Facility picks up hazardous and non-hazardous waste from clients, transports, consolidates and tracks the waste.
17. Respondent is now and was at the time of the violations alleged herein, a "person" as that term is defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and COMAR 26.13.01.03B(61).
18. At all times relevant to the allegations set forth in this Consent Agreement, Respondent is, and has been, the "operator" and the "owner" of the Facility, as those terms are defined in COMAR 26.13.01.03.B(58) and (59), during the period of the violations alleged in this Consent Agreement. Respondent or its corporate predecessor has owned and operated the Facility since the 1990s.
19. At all times relevant to the allegations set forth in this Consent Agreement, and as described below, Respondent is, and has been, engaged in the "storage" of "solid waste" and "hazardous waste" in "containers" at the Facility, as those terms are defined in COMAR 26.13.01.03.B(76), (73), (31), and (9).

20. At all times relevant to the allegations set forth in this Consent Agreement, Respondent's Facility is, and has been, a hazardous waste storage "facility" as that term is defined in COMAR 26.13.01.03.B(23).
21. On December 13, 2017, two duly-authorized representatives of EPA ("EPA Inspectors") conducted a Compliance Evaluation Inspection at the Facility (the "CEI" or "Inspection"), along with a representative of the Maryland Department of the Environment, to examine the Respondent's compliance with the federally-authorized MdHWMR and applicable federal hazardous waste regulations.
22. On August 22, 2019, EPA sent a Request to Show Cause ("Show Cause letter") to Respondent advising it of EPA's preliminary findings of violations at the Facility and offering the Respondent an opportunity to provide such additional information as it believed the Agency should review and consider before reaching any final conclusions as to the Respondent's compliance with the MdHWMR and federal hazardous waste regulations at the Facility. Respondent provided additional information to EPA in response to the Show Cause letter.
23. On the basis of EPA's findings during the Inspection, and Respondent's response to EPA's Show Cause letter, EPA concludes that Respondent has violated certain requirements and provisions of RCRA Subtitle C, 42 U.S.C. §§ 6921-6939g, certain federally-authorized MdHWMR requirements promulgated thereunder, and certain applicable federal hazardous waste regulations as well as certain requirements under the Permit.

Count I

(Failure to Complete and Maintain the Record of Transfer Facility Tracking Logs as Required by the Permit)

24. The information and allegations in the proceeding Paragraphs of this Consent Agreement are incorporated herein by reference.
25. Part IV of the Permit states that "*The Transfer Facility Tracking Log (section 5) shall be used to record the arrival and departure of containers. The log must be completed immediately upon arrival and departure of a manifested shipment of waste.*" The intent of the transfer logs is to document the amount of time containers of hazardous waste remain onsite, and to ensure that containers of hazardous waste remain associated with the relative hazardous waste manifests.
26. During the December 13, 2017 CEI, the EPA inspectors reviewed transfer tracking log sheets from 12/8/16 to 12/12/17, which are maintained onsite using paper copies. The Facility provided copies of the following Transfer Facility Tracking Logs, which are listed hereto by the "date received" that is indicated on the log sheet: 1/6/17, 1/12/17, 2/3/17, 3/29/17, 7/7/17, 7/14/17, 7/18/17, 9/29/17, 9/30/17, 11/13/17, and 11/14/17. The

copies of the Transfer Facility Tracking Logs are incomplete insofar as they fail to include the date shipped, vehicle number, driver name, and number of containers.

27. Based on the Transfer Facility Tracking Logs that were reviewed by the EPA inspectors during the CEI, the Facility did not complete the tracking logs upon arrival and departure of hazardous waste containers.
28. Respondent failed to complete and maintain its Transfer Facility Tracking Logs (11) in violation of the Permit.

Count II

(Failure to Perform and Record Daily Inspections at the Facility as Required by the Permit)

29. The information and allegations in the proceeding Paragraphs of this Consent Agreement are incorporated herein by reference.
30. Part IV of the Permit, which references Attachment 2, states that inspections are to be done "*daily (each day operations are conducted).*"
31. During the December 13, 2017 CEI, the EPA inspector reviewed the inspection forms for the daily inspections conducted by the Facility personnel from April 2016 to the date of the CEI. Respondent manually recorded and kept paper copies of the daily inspection form per the inspection plan listed in Attachment 2 of the Permit. Records prior to this time frame were not on site at the time of the CEI.
32. Following a request from EPA to provide earlier daily inspection records, Respondent was unable to provide to EPA the daily inspection forms from May 17, 2015 to June 14, 2015 during which time the Facility was in operation.
33. Respondent failed to conduct daily inspections from May 17, 2015 to June 14, 2015 or for 28 days, in violation of the Permit.

Count III

(Failure to Perform and Record Weekly Inspections at the Facility as Required by the Permit)

34. The information and allegations in the proceeding Paragraphs of this Consent Agreement are incorporated herein by reference.
35. Part I of the Permit states that weekly inspections are to be performed and recorded at the Facility consistent with the Inspection Plan in the Permit using the form that is included in Attachment 2 of the Permit (which references Part IV, Attachment 2, Section F-2a and F-2d.).

36. During the December 13, 2017 CEI, the EPA inspector reviewed the weekly inspection records, and determined that the Facility was missing the following weekly inspection records between the following dates: 1-20-17 through 2-17-17, 2-17-17 through 3-3-17, 4-21-17 through 5-5-17, and 8-18-17 through 9-1-17. The Facility provided copies of weekly inspection records dated 1-20-17, 2-17-17, 4-21-17, 5-5-17, 8-18-17, and 9-1-17.
37. Following a request from EPA to provide weekly inspection forms between May 17, 2015 and June 14, 2015, Respondent was unable to provide a weekly inspection form from June 14, 2015.
38. Respondent failed to perform and record weekly inspections for six weeks during the following time dates: the week of June 14, 2015, 1-20-17 through 2-17-17, 2-17-17 through 3-3-17, 4-21-17 through 5-5-17, and 8-18-17 through 9-1-17 in violation of the Permit.

**Count IV
(Failure to Update the Facility Contingency Plan)**

39. The information and allegations in the proceeding Paragraphs of this Consent Agreement are incorporated herein by reference.
40. Part IV of the Permit requires that Respondent must maintain at the Facility an emergency Contingency Plan that includes, among other things, emergency coordinators names, duties, and contact information. Part VI, Attachment 5 – Section G of the Permit states: *“This plan is not a static document. It can and must be reviewed, amended, and improved frequently.”*
41. During the December 13, 2017 CEI, the Facility provided a paper copy of its Contingency Plan to the EPA inspectors and it was noted to be last updated on 10/20/11. Respondent representative indicated that the Contingency Plan was out of date, and the Facility was in the process of updating the Contingency Plan. Of the two emergency coordinators listed in the Contingency Plan, the first was in a different position and the second was no longer serving as the emergency coordinator at the Facility.
42. Respondent failed, since sometime after 10/20/11 to the date of the CEI, to review and update or amend its contingency plan in violation of the Permit.

**Count V
(Failure to Prepare Accurate Hazardous Waste Manifests as Required COMAR
26.13.03.04.A(1))**

43. The information and allegations in the proceeding Paragraphs of this Consent Agreement are incorporated herein by reference.
44. COMAR 26.13.03.04.A(1) (which references 40 C.F.R 262.20(a)(1), appendix Item 8),

requires those who transport or offer for transport hazardous waste, among other things, prepare accurate hazardous waste manifests for each shipment of hazardous waste that, among other information, includes designating the final Transfer Storage Disposal Facility (“TSDF”) on the manifest.

45. During the December 13, 2017 CEI, the EPA inspectors reviewed hazardous waste manifests for any offsite shipments of hazardous waste that were generated by Respondent. After the CEI, EPA reviewed the additional hazardous waste manifest provided by Respondent. The following four manifests listed waste which the Respondent determined corrosive (D002) hazardous waste and which Respondent also listed with a chromium (D007) toxicity waste code: #008848152 FLE dated 6/1/15, #008848159 FLE dated 6/2/15, #008848169 FLE dated 6/3/15, and #008848168 FLE dated 6/3/15. The designated TSDF in the manifests was Clean Harbors Baltimore, Inc. (EPA ID # MDD980555189). According to Facility personnel, the hazardous waste was generated from the cleanup of an Olcum spill. The spill occurred on Saturday, 5/30/15 from leaking totes that were on a transfer truck located at the Facility. In the Discrepancy Section 18.a. of each manifest, the D002 and D007 waste codes were removed, and notes were included to determine the material to be a non-hazardous waste.
46. In the Facility’s 2015 Biennial Hazardous Waste Report, Respondent reported three (3) hazardous waste shipments to Clean Harbors El Dorado (EPA ID# ARD069748192), the streams were described with the following waste codes and comments:
 - D002 “CLEANUP MATERIAL FROM RELEASE”
 - D007
 - D007 “NEUTRALIZED SPILL CLEANUP SULFURIC ACID, CHROMIUM ABSORBENTS”
47. Based on the review of the hazardous waste manifests and the information contained in the 2015 Biennial Hazardous Waste Report, Respondent failed to designate the final TSDF in three hazardous waste manifests, and therefore failed to prepare accurate hazardous waste manifests in violation of COMAR 26.13.03.04.A(1).

CIVIL PENALTY

48. In settlement of EPA’s claims for civil penalties for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty in the amount of **FOUR THOUSAND NINE HUNDRED FIFTY DOLLARS (\$4,950.00)**, which Respondent shall be liable to pay in accordance with the terms set forth below.
49. The civil penalty is based upon EPA’s consideration of a number of factors, including the penalty criteria (“statutory factors”) set forth in Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), including, the following: the seriousness of the violation and any good faith efforts to comply with the applicable requirements. These factors were applied to the particular facts and circumstances of this case with specific reference to EPA’s October, 1990 RCRA Civil Penalty Policy, as revised in June, 2003 (“RCRA Penalty Policy”), which reflect the statutory penalty criteria and factors set forth at Section 3008(a)(3) and (g) of RCRA, 42 U.S.C. §§ 6928(a)(3) and (g), the appropriate Adjustment of Civil

Monetary Penalties for Inflation, pursuant to 40 C.F.R. Part 19, and the applicable EPA memoranda addressing EPA's civil penalty policies to account for inflation.

50. Payment of the civil penalty amount, and any associated interest, administrative fees, and late payment penalties owed, shall be made by either cashier's check, certified check or electronic wire transfer, in the following manner:

- a. All payments by Respondent shall include reference to Respondent's name and address, and the Docket Number of this action, *i.e.*, RCRA-03-2020-0136;
- b. All checks shall be made payable to the "United States Treasury";
- c. All payments made by check and sent by regular mail shall be addressed and mailed to:

U.S. Environmental Protection Agency
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

- d. For additional information concerning other acceptable methods of payment of the civil penalty amount see:

<https://www.epa.gov/financial/makepayment>

- e. A copy of Respondent's check or other documentation of payment of the penalty using the method selected by Respondent for payment shall be sent simultaneously, by email and by first class mail, to:

Jeffrey S. Nast
Sr. Assistant Regional Counsel
U.S. EPA, Region III (3RC40)
1650 Arch Street
Philadelphia, PA 19103-2029
nast.jeffrey@epa.gov

Regional Hearing Clerk
U.S. EPA, Region III (3RC00)
1650 Arch Street
Philadelphia, PA 19103-2029
R3_Hearing_Clerk@epa.gov

51. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, EPA is entitled to assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim, as more fully described below. Accordingly, Respondent's failure to make timely payment of the penalty as

specified herein shall result in the assessment of late payment charges including interest, penalties and/or administrative costs of handling delinquent debts.

52. Payment of the civil penalty is due and payable immediately upon receipt by Respondent of a true and correct copy of the fully executed and filed Consent Agreement and Final Order. Receipt by Respondent or Respondent's legal counsel of such copy of the fully executed Consent Agreement and Final Order, with a date stamp indicating the date on which the Consent Agreement and Final Order was filed with the Regional Hearing Clerk, shall constitute receipt of written initial notice that a debt is owed EPA by Respondent in accordance with 40 C.F.R. § 13.9(a).
53. INTEREST: In accordance with 40 C.F.R § 13.11(a)(1), interest on the civil penalty assessed in this Consent Agreement and Final Order will begin to accrue on the date that a copy of the fully executed and filed Consent Agreement and Final Order is mailed or hand-delivered to Respondent. However, EPA will not seek to recover interest on any amount of the civil penalties that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R § 13.11(a).
54. ADMINISTRATIVE COSTS: The costs of the EPA's administrative handling of overdue debts will be charged and assessed monthly throughout the period a debt is overdue. 40 C.F.R. § 13.11(b). Pursuant to Appendix 2 of EPA's *Resources Management Directives – Case Management*, Chapter 9, EPA will assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid.
55. LATE PAYMENT PENALTY: A late payment penalty of six percent per year will be assessed monthly on any portion of the civil penalty that remains delinquent more than ninety (90) calendar days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d).
56. Respondent agrees not to deduct for federal tax purposes the civil penalty assessed in this Consent Agreement and Final Order.
57. For purposes of the identification requirement of Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. §162(f)(2)(A)(ii), obtaining engineer's certification for Tanks A and B, and providing release detection for Tanks A and B, as required by Paragraphs 81 through 86, below, is restitution or required to come into compliance with law.

GENERAL SETTLEMENT CONDITIONS

58. By signing this Consent Agreement, Respondent acknowledges that this Consent Agreement and Final Order will be available to the public and represents that, to the best of Respondent's knowledge and belief, this Consent Agreement and Final Order does not

contain any confidential business information or personally identifiable information from Respondent.

59. Respondent certifies that any information or representation it has supplied or made to EPA concerning this matter was, at the time of submission true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. EPA shall have the right to institute further actions to recover appropriate relief if EPA obtains evidence that any information provided and/or representations made by Respondent to the EPA regarding matters relevant to this Consent Agreement and Final Order, including information about respondent's ability to pay a penalty, are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that EPA may have, civil or criminal, under law or equity in such event. Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

OTHER APPLICABLE LAWS

60. Nothing in this Consent Agreement and Final Order shall relieve Respondent of its obligation to comply with all applicable federal, state, and local laws and regulations, nor shall it restrict EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on the validity of any federal, state or local permit. This Consent Agreement and Final Order does not constitute a waiver, suspension or modification of the requirements of the Resource Conservation and Recovery Act, or any regulations promulgated thereunder.

RESERVATION OF RIGHTS

61. This Consent Agreement and Final Order resolves only EPA's claims for civil penalties for the specific violation[s] alleged against Respondent in this Consent Agreement and Final Order. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. This settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice, 40 C.F.R. § 22.18(c). EPA reserves any rights and remedies available to it under RCRA, the regulations promulgated thereunder and any other federal law or regulation to enforce the terms of this Consent Agreement and Final Order after its effective date.

EXECUTION /PARTIES BOUND

62. This Consent Agreement and Final Order shall apply to and be binding upon the EPA, the Respondent and the officers, directors, employees, contractors, successors, agents and assigns of Respondent. By his or her signature below, the person who signs this Consent Agreement on behalf of Respondent is acknowledging that he or she is fully authorized

by the Respondent to execute this Consent Agreement and to legally bind Respondent to the terms and conditions of this Consent Agreement and Final Order.

EFFECTIVE DATE

63. The effective date of this Consent Agreement and Final Order is the date on which the Final Order, signed by the Regional Administrator of EPA, Region III, or his/her designee, the Regional Judicial Officer, is filed along with the Consent Agreement with the Regional Hearing Clerk pursuant to the Consolidated Rules of Practice.

ENTIRE AGREEMENT

64. This Consent Agreement and Final Order constitutes the entire agreement and understanding between the Parties regarding settlement of all claims for civil penalties pertaining to the specific violations alleged herein and there are no representations, warranties, covenants, terms, or conditions agreed upon between the Parties other than those expressed in this Consent Agreement and Final Order.

In re: *Clean Harbors Laurel, LLC*

EPA Docket No. RCRA-03-2020-0136

For Respondent: CLEAN HARBORS LAUREL, LLC

Date: 9/10/2010

By: 
William Connors, Sr. VP Compliance

For the Complainant:

After reviewing the Consent Agreement and other pertinent matters, I, the undersigned Director of the Enforcement and Compliance Assurance Division of the United States Environmental Protection Agency, Region III, agree to the terms and conditions of this Consent Agreement and recommend that the Regional Administrator, or his/her designee, the Regional Judicial Officer, issue the attached Final Order.

Date: 9/24/20

By: **KAREN MELVIN** Digitally signed by KAREN MELVIN
Date: 2020.09.24 14:34:52 -04'00'
Karen Melvin
Director, Enforcement and Compliance
Assurance Division
U.S. EPA – Region III
Complainant

Attorney for Complainant:

Date: 9/22/20

By: **JEFFREY NAST** Digitally signed by JEFFREY NAST
Date: 2020.09.22 16:23:06 -04'00'
Jeffrey S. Nast
Sr. Assistant Regional Counsel
U.S. EPA – Region III

shall not in any case affect the right of the Agency or the United States to pursue appropriate injunctive or other equitable relief, or criminal sanctions for any violations of the law. This Final Order resolves only those causes of action alleged in the Consent Agreement and does not waive, extinguish or otherwise affect Respondent’s obligation to comply with all applicable provisions of RCRA and the regulations promulgated thereunder.


The effective date of the attached Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

Date: 9/29/20

By:

**JOSEPH
LISA**

Joseph J. Lisa
Regional Judicial and Presiding Officer
U.S. EPA Region III

 Digitally signed by
JOSEPH LISA
Date: 2020.09.29
09:14:11 -04'00'

