

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

2016 MAY -3 AM 9:08

11201 RENNER BOULEVARD
LENEXA, KANSAS 66219

IN THE MATTER OF:

A.T. Still University of Health Sciences,
d/b/a A.T. Still University

Respondent

Proceeding under Sections 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-07-2016-0024

I. PRELIMINARY STATEMENT

The U.S. Environmental Protection Agency (EPA), Region 7 (Complainant) and A.T. Still University of Health Sciences d/b/a A.T. Still University (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 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).

II. ALLEGATIONS

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), and the Hazardous and Solid Waste Amendments of 1984, 42 U.S.C. § 6928(a) and (g), and in accordance with the Consolidated Rules of Practice. This 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 serves as notice that the EPA has reason to believe that Respondent violated Section 3005 of RCRA, 42 U.S.C § 6925.

Parties

3. Complainant is the Division Director of the Air and Waste Management Division of EPA, Region 7, as duly delegated from the Administrator of EPA.

4. Respondent is A. T. Still University, a not-for-profit university authorized to operate under the laws of Missouri.

Statutory and Regulatory Framework

5. The State of Missouri has been granted authorization to administer and enforce a hazardous waste program pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926. The State of Missouri has adopted by reference the federal regulations cited herein at pertinent parts in the Missouri Code of State Regulations (C.S.R.) in Title 10, Division 25. Section 3008 of RCRA, 42 U.S.C. § 6928, authorizes EPA to enforce the provisions of the authorized State program and the regulations promulgated thereunder. When 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(a) of RCRA, 42 U.S.C. § 6928(a).

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 \$37,500 per day are authorized for violations of Subchapter III of RCRA that occur after January 12, 2009. 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, 42 U.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) of 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.

7. The regulations for determining whether a waste is a solid and/or hazardous waste are set forth at 10 C.S.R. 25-4.261, which incorporate by reference the regulations at 40 C.F.R. Part 261.

8. Section 3005 of RCRA, 42 U.S.C. § 6925, R.S. Mo. 260.390.1(1), and the regulations at 10 C.S.R. 25-7.270 incorporating by reference 40 C.F.R. § 270.1(b), require each person owning or operating a facility for the treatment, storage, or disposal of a hazardous waste identified or listed under Subchapter C of RCRA to have a permit for such activities.

9. The regulations at 40 C.F.R. § 262.34(d), incorporated by reference at 10 C.S.R. 25-5.262, state that a generator may accumulate hazardous waste on-site for one hundred eighty days (180) days or less without a permit or without interim status, provided the conditions listed in 40 C.F.R. § 262.34(d)(1)-(5) are met. If a generator fails to comply with any of these

conditions, the generator is not allowed to store hazardous waste at its facility for any length of time.

10. The regulation at 40 C.F.R. § 261.5(a) states that a generator is a conditionally exempt small quantity generator in a calendar month if he generates no more than 100 kilograms of hazardous waste in that month.

11. The regulation at 40 C.F.R. § 261.5(b) states that except for specifically identified wastes in the regulations, a conditionally exempt small quantity generator's hazardous wastes are not subject to regulation under parts 262 through 268 and parts 270 and 124 of this chapter provided the generator complies with the requirements of paragraphs (f), (g), and (j).

General Factual Background

12. Respondent is a business and authorized to conduct business within the State of Missouri. Respondent is a "person" as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

13. Relevant to this Consent Agreement and Final Order, Respondent's facilities are located at 800 West Jefferson Street and 204 West Jefferson Street, Kirksville, Missouri. Respondent is an institution of osteopathic healthcare and contains the Missouri School of Dentistry and Oral Health. Respondent employs approximately 686 people.

14. At the time of the inspection, the following solid wastes were present:

- a. One 1-liter bottle labeled "phenol" and "biohazard" located under a fume hood located in the TBR Lab #307;
- b. Two 300-milliliter bottles labeled "sat. picric acid" located under a fume hood located in the TBR Lab #307;
- c. One 1-liter bottle labeled "equilibrated phenol" twice distilled located under a fume hood located in the TBR Lab #307;
- d. One 1-pint bottle that was unlabeled located under a fume hood located in the TBR Lab #307;
- e. One 300-milliliter bottle labeled "40% acrylamide stock" located under a fume hood located in the TBR Lab #307;
- f. Autoclave Indicator tape (lead-based tape and lead-safe tape); and
- g. Three 55-gallon containers of waste xylene and waste formalin.

15. At the time of the inspection, the following hazardous wastes were present:

- a. One 1-liter bottle labeled "phenol" and "biohazard" located under a fume hood located in the TBR Lab #307. This bottle contained D002 characteristic waste;
- b. Two 300-milliliter bottles labeled "sat. picric acid" located under a fume hood located in the TBR Lab #307. This bottle contained D001/D002 characteristic waste;

- c. One 1-liter bottle labeled “equilibrated phenol” twice distilled located under a fume hood located in the TBR Lab #307. This bottle contained U188 listed waste;
- d. One 1-pint bottle that was unlabeled located under a fume hood located in the TBR Lab #307. This bottle contained U007 listed waste;
- e. One 300-milliliter bottle labeled “40% acrylamide stock” located under a fume hood located in the TBR Lab #307. This bottle contained U007 listed waste;
- f. Autoclave Indicator tape (lead-based tape and lead-safe tape). These tapes are D008 listed waste; and
- g. Three 55-gallon containers of waste xylene and waste formalin. Waste xylene is D001 and F003 while waste formalin is D001.

16. On or about May 31, 1996, Respondent notified as a Small Quantity Generator (SQG) of hazardous waste pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930, for the Main Campus. On or about May 2, 1996, Respondent notified as an SQG of hazardous waste pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930, for the Coutts Learning Center. SQGs generate greater than 100 kilograms but less than 1,000 kilograms of hazardous waste per month.

17. Respondent has been assigned the following EPA ID Number for the Main Campus: MOR000007633. Respondent has been assigned the following EPA ID Number for the Coutts Learning Center: MOD985820778.

18. On or about June 10, 2014, an EPA inspector conducted a RCRA Compliance Evaluation Inspection (hereinafter “the inspection”) of the hazardous waste management practices at Respondent’s facilities. Based on a review of the inspection report and the information provided during the inspection by facility personnel, it was determined that Respondent was operating, at the time of the inspection, as an SQG at the Coutts Learning Center and Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste at the Main Campus. A CESQG generates 100 kilograms or less per month of hazardous waste or one kilogram or less per month of acutely hazardous waste. Respondent was operating as a Small Quantity Handler of universal waste and co-generator of used oil.

Violations

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

Count 1

Failure to Conduct Hazardous Waste Determinations

20. Complainant hereby incorporates the allegations contained in Paragraphs 12 through 18 above, as if fully set forth herein.

21. Pursuant to 10 C.S.R. 25-5.262(1), which incorporates 40 C.F.R. § 262.11 by reference, a generator of solid waste, as defined in 40 C.F.R. §§ 260.10 and 261.2, must

determine if that waste is a hazardous waste using methods prescribed in the regulations.

22. At the time of the inspection, it was determined that Respondent was generating the following solid waste streams on the main campus:

- a. One 1-liter bottle labeled "phenol" and "biohazard" located under a fume hood located in the TBR Lab #307. This bottle contained D002 characteristic waste;
- b. Two 300-milliliter bottles labeled "sat. picric acid" located under a fume hood located in the TBR Lab #307. This bottle contained D001/D002 characteristic waste;
- c. One 1-liter bottle labeled "equilibrated phenol" twice distilled located under a fume hood located in the TBR Lab #307. This bottle contained U188 listed waste;
- d. One 1-pint bottle that was unlabeled located under a fume hood located in the TBR Lab #307. This bottle contained U007 listed waste;
- e. One 300-milliliter bottle labeled "40% acrylamide stock" located under a fume hood located in the TBR Lab #307. This bottle contained U007 listed waste; and
- f. Autoclave Indicator tape (lead-based tape and lead-safe tape). These tapes are D008 characteristic waste.

23. At the time of the inspection, Respondent had not conducted hazardous waste determinations on any of the solid waste streams described in Paragraph 22 above.

24. Respondent's failure to perform a hazardous waste determination on the above-referenced solid waste streams is a violation of 10 C.S.R. 25-5.262 which incorporates 40 C.F.R. § 262.11 by reference.

Count 2

Operating as a Treatment, Storage or Disposal Facility Without a RCRA Permit or RCRA Interim Status

25. Complainant hereby incorporates the allegations contained in Paragraphs 12 through 18 above, as if fully set forth herein.

26. Section 3005 of RCRA, 42 U.S.C. § 6925, R.S. Mo. 260.390.1(1), and the regulations at 10 C.S.R. 25-7.270 incorporating by reference 40 C.F.R. § 270.1(b), require each person owning or operating a facility for the treatment, storage, or disposal of a hazardous waste identified or listed under Subchapter C of RCRA to have a permit for such activities.

27. At the time of the inspection, Respondent did not have a permit or interim status for the Coups Learning Center.

28. The regulations at 10 C.S.R. 25-5.262 incorporate 40 C.F.R. § 262.34(d) by reference and state that a generator may accumulate hazardous waste on-site for one hundred eighty days (180) days or less without a permit or without interim status, provided the conditions listed in 40 C.F.R. § 262.34(d)(1)-(5) are met. A generator of this size is considered a SQG of hazardous waste. If a SQG fails to comply with any of these conditions, the generator is not allowed to store hazardous waste at their facility for any length of time. Respondent failed to comply with the following conditions at the Coutts Learning Center:

Generator Requirements

Failure to conduct weekly hazardous waste inspections

29. The regulation at 10 C.S.R. 25-5.262(1) incorporates 40 C.F.R. § 262.34(d)(2) by reference and requires that generator comply with the applicable requirements of Subpart I of 40 C.F.R. Part 265.

30. Pursuant to 40 C.F.R. § 265.174, as found in 40 C.F.R. Part 265 Subpart I, the owner or operator must inspect, at least weekly, areas where containers of hazardous waste are stored, looking for leaking containers and deteriorating containers caused by corrosion or other factors.

31. At the time of the inspection, Respondent failed to inspect three 55-gallon accumulation containers each containing D001 characteristic waste and F003 listed waste that were located in Anatomy Laboratory 300, Anatomy Laboratory 301 and Anatomy Laboratory 302.

Failure to close hazardous waste accumulation containers

32. The regulation at 10 C.S.R. 25-5.262(1) incorporates 40 C.F.R. § 262.34(d)(2) by reference and requires that the generator comply with the requirements of Subpart I of 40 C.F.R. Part 265.

33. Pursuant to 40 C.F.R. § 265.173(a), as found in 40 C.F.R. § 265 Subpart I, a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

34. At the time of the inspection, Respondent failed to close three 55-gallon accumulation containers each containing D001 characteristic waste and F003 listed waste that were located in Anatomy Laboratory 300, Anatomy Laboratory 301 and Anatomy Laboratory 302 each of which had a funnel with an unsecured lid that sat in the open bung hole.

Failure to date hazardous waste accumulation containers

35. The regulation at 10 C.S.R. 25-5.262(1) incorporates 40 C.F.R. § 262.34(d)(4) by reference which further incorporates 40 C.F.R. § 262.34(a)(2). 40 C.F.R. § 262.34(a)(2) states

that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

36. At the time of the inspection, Respondent failed to mark the date of accumulation on three 55-gallon accumulation containers each containing D001 characteristic waste that were located in Anatomy Laboratory 300, Anatomy Laboratory 301 and Anatomy Laboratory 302.

Failure to label hazardous waste accumulation containers

37. The regulation at 10 C.S.R. 25-5.262(1) incorporates 40 C.F.R. § 262.34(d)(4) by reference which further incorporates 40 C.F.R. § 262.34(a)(3). 40 C.F.R. § 262.34(a)(3) states that while being accumulated on-site each container and tank is labeled or marked clearly with the words, "Hazardous Waste".

38. At the time of the inspection, Respondent failed to label or mark with the words "Hazardous Waste" three 55-gallon accumulation containers each containing D001 characteristic waste and F003 listed waste located in Anatomy Laboratory 300, Anatomy Laboratory 301, and Anatomy Laboratory 302.

Failure to post emergency coordinator's name, phone number and location of emergency equipment near a telephone

39. The regulation at 10 C.S.R. 25-5.262(1) incorporates 40 C.F.R. § 262.34(d)(5)(ii)(A) – (C) by reference which requires, in part, that the generator must post the name and telephone number of the emergency coordinator, location of fire extinguishers and spill control material, and if present fire alarm, and the telephone number of the fire department near the telephone.

40. At the time of the inspection, the information in the immediately preceding Paragraph was not posted next to the telephone.

Failure to make arrangements with local authorities

41. The regulation at 10 C.S.R. 25-5.262(1) incorporates 40 C.F.R. § 262.34(d)(4) by reference which requires that the generator comply with the requirements of Subpart C in 40 C.F.R. Part 265.

42. Pursuant to 40 C.F.R. § 265.37, as found in 40 C.F.R. § 265 Subpart C, the owner or operator must attempt to make arrangements with local authorities including police, fire departments, emergency response teams, and local hospitals.

43. At the time of the inspection, the Respondent failed to make arrangement with all the listed local authorities.

44. Because Respondent failed to comply with the generator requirements as set forth in Paragraphs 26 through 43 above, Respondent was not authorized to store hazardous

waste at its facility for any length of time, and therefore was operating a hazardous waste storage facility without a permit in violation of Section 3005 of RCRA.

CONSENT AGREEMENT

45. Respondent and EPA agree to the terms of this Consent Agreement and Final Order and Respondent agrees to comply with the terms of the Final Order portion of this Consent Agreement and Final Order.

46. Respondent admits the jurisdictional allegations of this Consent Agreement and Final Order 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 Consent Agreement and Final Order set forth below.

47. Respondent neither admits nor denies the factual allegations and legal conclusions set forth in this Consent Agreement and Final Order.

48. Respondent waives its right to contest any issue of fact or law set forth above and its right to appeal the Final Order accompanying this Consent Agreement.

49. Respondent and Complainant agree to conciliate the matters set forth in this Consent Agreement and Final Order without the necessity of a formal hearing and to bear their respective costs and attorney's fees.

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

51. This Consent Agreement and Final Order addresses 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.

52. The effect of settlement described in Paragraph 51 above is conditioned upon the accuracy of Respondent's representations to EPA, as memorialized in Paragraph 53, below, of this Consent Agreement and Final Order.

53. Respondent certifies that by signing this Consent Agreement and Final Order that to best of its knowledge, Respondent's facility is in compliance with all requirements of RCRA, 42 U.S.C. § 6901 *et. seq.*, and all regulations promulgated thereunder.

54. The undersigned representative of Respondent certifies that he or she is fully authorized to enter the terms and conditions of this Consent Agreement and Final Order and to execute and legally bind Respondent to it.

55. Respondent agrees that, in settlement of the claims alleged in this Consent Agreement and Final Order, Respondent shall pay a penalty of Eleven Thousand Two Hundred

Thirty-Three Dollars (\$11,233) as set forth in Paragraph 1 of the Final Order portion of this Consent Agreement and Final Order, below.

56. The penalty specified in the Paragraph above shall represent civil penalties assessed by EPA and shall not be deductible for purposes of Federal, State and local taxes.

57. Respondent consents to the issuance of this Consent Agreement and Final Order and consents for the purposes of settlement to the payment of the civil penalty cited in the immediately preceding Paragraph.

58. Respondent agrees to prominently post on its public web site (www.atsu.edu): 1) the Memorandum of Understanding for Hazardous Waste Exposure between A.T. Still University of Health Sciences and Northeast Regional Medical Center, and 2) the Memorandum of Understanding for Hazardous Waste Exposure between A.T. Still University of Health Sciences and the Kirksville Fire Department and Kirksville Police Department. Respondent agrees to post these documents within five (5) days of the Effective Date and may remove them one (1) year after the Effective Date. Any updates to the Memoranda of Understanding during this timeframe must also be updated in the on-line version.

59. Late Payment Provisions: Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. Interest will therefore begin to accrue on a civil or stipulated penalty if it is not paid by the date required. Interest will be assessed at a rate of the United States Treasury Tax and loan rate in accordance with 31 C.F.R. § 901.9(b). A charge will be assessed to cover the costs of debt collection including processing and handling costs and attorney fees. In addition, a non-payment penalty charge of six (6) percent per year compounded annually will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. Any such non-payment penalty charge on the debt will accrue from the date the penalty payment becomes due and is not paid. 31 C.F.R. § 901.9(c) and (d).

60. 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.

Effective Date

61. This Consent Agreement and Final Order shall be effective upon filing of the Final Order by the Regional Hearing Clerk for EPA, Region 7. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

Reservation of Rights

62. Notwithstanding any other provision of this Consent Agreement and Final Order, EPA reserves the right to enforce the terms of the Final Order portion of this Consent Agreement and Final Order 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) of RCRA, for each day of non-compliance with the terms of the Final Order, or to seek any other remedy allowed by law.

63. 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 Consent Agreement and Final Order.

64. Except as expressly provided herein, nothing in this Consent Agreement and Final Order 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.

65. Notwithstanding any other provisions of the Consent Agreement and Final Order, 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.

66. The headings in this Consent Agreement and Final Order are for convenience of reference only and shall not affect interpretation of this Consent Agreement and Final Order.

67. The provisions of this Consent Agreement and Final Order 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 Consent Agreement and Final Order, IT IS HEREBY ORDERED THAT:

A. Payment of Civil Penalty

1. Within thirty (30) days of the effective date of this Consent Agreement and Final Order, Respondent will pay a civil penalty of Eleven Thousand Two Hundred Thirty-Three Dollars (\$11,233).

2. Payment of the penalty 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:

United States Environmental Protection Agency
Fines and Penalties

Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000,

or by alternate payment method described at www.epa.gov/financial/makepayment.

3. A copy of the check, transfer, or on-line payment confirmation shall simultaneously be sent to the following:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219; and

Kelley Catlin, Attorney
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

4. No portion of the civil penalty or interest paid by Respondent pursuant to the requirements of this Consent Agreement and Final Order shall be claimed by Respondent as a deduction for federal, state, or local income tax purposes.

B. Compliance Actions

5. Respondent shall take the following actions within the time periods specified, according to the terms and conditions specified below:

- a. Prepare a written narrative with supporting photographic documentation showing that Respondent is correctly managing all hazardous waste containers in the Coats building. The first submission is due within thirty (30) days of the Effective Date of this Consent Agreement and Final Order. The subsequent three (3) submissions shall be provided ninety (90) days after the previous submission.

6. Respondent shall submit all documentation generated to comply with the requirements as set forth in the immediately preceding Paragraph to the following address:

Deborah Bredehoft, AWMD/WEMM
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

C. Parties Bound

7. The Final Order portion of this Consent Agreement and Final Order shall apply to and be binding upon Respondent and Respondent's agents, successors and/or assigns. 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 Consent Agreement and Final Order.

COMPLAINANT:

U.S. ENVIRONMENTAL PROTECTION AGENCY

4/29/16
Date

Becky Weber
Becky Weber, Division Director
Air and Waste Management Division

4/27/16
Date

Kelley Catlin
Kelley Catlin
Office of Regional Counsel

For Respondent, A.T. Still University of Health Science
d/b/a A.T. Still University

4/26/2016
Date

Richard Rieder
Signature

Richard Rieder
Printed Name

VP Finance & Administration / CFO
Title

IT IS SO ORDERED. This Final Order shall become effective upon filing.

5-3-16
Date

Karina Borromeo
Karina Borromeo
Regional Judicial Officer

IN THE MATTER Of A.T. Still University of Health Sciences, d/b/a A.T. Still University,
Respondent
Docket No. RCRA-07-2016-0024

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 emailed to Attorney for Complainant:

catlin.kelley@epa.gov

Copy by First Class Mail to Respondent:

VP Finance & Administrator/CFO

A.T. Still University of Health Sciences d/b/a A.T. Still University

800 W. Jefferson Street

Kirksville, MO 63501

Dated: 5/3/16



Kathy Robinson
Kathy Robinson
Hearing Clerk, Region 7