



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Via Certified Mail, Return Receipt Requested

Daniel Moreka, President
Idas, LLC
2869 Broad Rock Blvd
Richmond, VA 23224

OCT 25 2012

Re: Certified Copy of CAFO (Docket No. RCRA-03-2013-0016)

Dear Mr. Moreka:

Please find enclosed a certified copy of the above captioned settlement document ("CAFO"). This CAFO was filed with the Regional Hearing Clerk today, October 26, 2012, and is therefore in full force and effect. Your payment obligations are set forth in paragraphs 26-39. The due dates for the installment payments are set forth in paragraph 27. You should note the date that you received this CAFO so that you can calculate the timing of your payment obligations. Thank you for cooperating with EPA during the pendency of this matter.

Sincerely,


Benjamin Cohan, Esq.

REGIONAL HEARING CLERK
EPA REGION III, PHILA. PA

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Enclosure

cc: Melissa Toffel (3LC70)

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BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

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REGIONAL HEARING CLERK
EPA REGION III, PHILA. PA

In the Matter of:)
)
Idas LLC)
2869 Broad Rock Blvd)
Richmond, VA 23224)

U.S. EPA Docket Number
RCRA-03-2013-0016

RESPONDENT)
)
)

BP Amoco and/or Broad Rock BP)
2869 Broad Rock Blvd)
Richmond, VA 23224)

FACILITY.)
)
)

Proceeding Under Section 9006 of the
Resource Conservation and Recovery Act,
as amended, 42 U.S.C. Section 6991e

CONSENT AGREEMENT

This Consent Agreement ("CA") is entered into by the Director, Land and Chemicals Division, U.S. Environmental Protection Agency, Region III ("Complainant") and Idas, LLC ("Respondent"), pursuant to Section 9006 of the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. §§ 6991e, and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules"), 40 C.F.R. Part 22, including, specifically 40 C.F.R. §§ 22.13(b) and .18(b)(2) and (3).

This CA and the Final Order (collectively "CAFO"), resolve alleged violations of RCRA Subtitle I, 42 U.S.C. §§ 6991-6991m, and the Commonwealth of Virginia's federally authorized underground storage tank ("UST") program by Respondent in connection with its underground storage tanks at Respondent's facility located at 2869 Broad Rock Blvd, Richmond, Virginia (the "Facility").

Effective October 28, 1998, pursuant to Section 9004 of RCRA, 42 U.S.C. § 6991c, and 40 C.F.R. Part 281, Subpart A, the Commonwealth of Virginia was granted final authorization to administer a state UST management program *in lieu* of the Federal underground storage tank management program established under Subtitle I of RCRA, 42 U.S.C. §§ 6991-6991i. The

provisions of the Virginia UST management program, through these final authorizations, have become requirements of Subtitle I of RCRA and are, accordingly, enforceable by EPA pursuant to Section 9006 of RCRA, 42 U.S.C. § 6991e. Virginia's authorized UST program regulations are set forth in the Virginia Administrative Code as Underground Storage Tanks: Technical Standards and Corrective Action Requirements ("VA UST Regulations"), 9 VAC § 25-580-10 *et seq.*

GENERAL PROVISIONS

1. For purposes of this proceeding only, Respondent admits to the jurisdictional allegations set forth in this CAFO.
2. Respondent neither admits nor denies the specific factual allegations and conclusions of law set forth in this CAFO, except as provided in Paragraph 1, above.
3. Respondent agrees not to contest EPA's jurisdiction with respect to the execution of this Consent Agreement ("CA"), the issuance of the attached Final Order ("FO"), or the enforcement thereof.
4. For the purposes of this proceeding only, Respondent hereby expressly waives its right to a hearing on any issue of law or fact set forth in this CA and any right to appeal the accompanying FO.
5. Respondent consents to the issuance of this CAFO, and agrees to comply with its terms and conditions.
6. Respondent shall bear its own costs and attorney's fees.
7. As to RCRA, Subtitle I, 42 U.S.C. §§ 6991-6991m, and the Commonwealth of Virginia's federally authorized underground storage tank program set forth at 9 VAC § 25-580-10 *et seq.* allegedly violated as set forth in the Factual Allegations and Conclusions of Law, Respondent certifies to EPA that, upon appropriate investigation, to the best of Respondent's knowledge and belief, Respondent is presently in compliance with all such relevant provisions and regulations.
8. This CAFO shall not relieve Respondent of its obligations to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state or local permit, nor does this CAFO constitute a waiver, suspension or modification of the requirements of RCRA Subtitle I, 42 U.S.C. §§ 6991-6991m, or any regulations promulgated thereunder.
9. Complainant shall have the right to institute further actions to recover appropriate relief if Complainant obtains evidence that the information provided and/or representations made by Respondent to EPA regarding matters at issue in the CAFO are false or, in any material respect, inaccurate. Respondent is aware that the submission of false or misleading

information to the United States government may subject Respondent to separate civil and/or criminal liability.

10. EPA has given the Commonwealth of Virginia prior notice of the issuance of this CAFO in accordance with Section 9006(a)(2) of RCRA, 42 U.S.C. § 6991e(a)(2).

FACTUAL ALLEGATIONS AND CONCLUSIONS OF LAW

The United States Environmental Protection Agency - Region III ("EPA" or the "Region") and EPA's Office of Administrative Law Judges have jurisdiction over this matter pursuant to Section 9006 of RCRA, 42 U.S.C. § 6991e, 40 C.F.R. Part 280 and 40 C.F.R. § 22.1(a)(4) and .4(c).

11. At all times relevant to this CAFO, Respondent has been the "owner" and/or "operator," respectively, as those terms are defined in Section 9001(3) and (4) of RCRA, 42 U.S.C. § 6991(3) and (4), and 9 VAC § 25-580-10, of the "underground storage tanks" ("USTs") and "UST systems" as those terms are defined in Section 9001(10) of RCRA, 42 U.S.C. § 6991(10), and 9 VAC § 25-580-10, located at the Facility.
12. On October 4, 2011, EPA performed a Compliance Evaluation Inspection ("CEI") at the Facility. At the time of the October 4, 2011 CEI, and at all times relevant to the violations alleged herein, five (5) USTs were located at the Facility as described in the following subparagraph:
 - A. A twelve thousand (12,000) gallon cathodic-protected steel tank that was installed in or about 1970, and that, at all times relevant hereto, routinely contained and was used to store premium grade gasoline fuel, a "regulated substance" as that term is defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 9 VAC § 25-580-10 (hereinafter "UST No. 1");
 - B. A twelve thousand (12,000) gallon cathodic-protected steel tank that was installed in or about 1970, and that, at all times relevant hereto, routinely contained and was used to store mid-grade gasoline fuel, a "regulated substance" as that term is defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 9 VAC § 25-580-10 (hereinafter "UST No. 2");
 - C. A twelve thousand (12,000) gallon cathodic-protected steel tank that was installed in or about 1970, and that, at all times relevant hereto, routinely contained and was used to store regular grade gasoline fuel, a "regulated substance" as that term is defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 9 VAC § 25-580-10 (hereinafter "UST No. 3");
 - D. A ten thousand (10,000) gallon tank that was installed in or about 1985, and that, at all times relevant hereto, routinely contained and was used to store

diesel fuel, a "regulated substance" as that term is defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 9 VAC § 25-580-10 (hereinafter "UST No. 4"); and

E. A twelve thousand (12,000) gallon cathodic-protected steel tank that was installed in or about 1974, and that, at all times relevant hereto, routinely contained and was used to store kerosene fuel, a "regulated substance" as that term is defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 9 VAC § 25-580-10 (hereinafter "UST No. 5").

13. At all times relevant to the applicable violations alleged in this CAFO, USTs Nos. 1 through 5 have been "petroleum UST systems" and "existing tank systems" as these terms are defined in 9 VAC § 25-580-10.
14. USTs Nos. 1 through 5 are and were, at all times relevant to the applicable violations alleged in this CAFO, used to store "regulated substance(s)" at Respondent's Facility, as defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 9 VAC § 25-580-10, and have not been "empty" as that term is defined at 9 VAC § 25-580-310.1.

COUNT 1

(Failure to test automatic line leak detectors annually for USTs Nos. 1 through 5)

15. The allegations of Paragraphs 1 through 14 of this CA are incorporated herein by reference.
16. 9 VAC § 25-580-140(2) provides, in pertinent part, that all owners and operators of petroleum UST systems must provide release detection for pressurized piping as follows: ...Underground piping that conveys regulated substances under pressure must...be equipped with an automatic line leak detector conducted in accordance with 9 VAC § 25-580-170(1).
17. 9 VAC § 25-580-170(1) provides, in pertinent part, that with respect to automatic line leak detectors, "[a]n annual test of the operation of the leak detector must be conducted in accordance with the manufacturer's requirements".
18. From 4/1/07-10/13/11, Respondent failed to conduct the annual automatic line leak detector tests associated with USTs Nos. 1 through 5 as required by 9 VAC § 25-580-170(1).
19. Respondent's acts and/or omissions as alleged in Paragraph 18, above, constitute violations by Respondent of 9 VAC § 25-580-170(1).

COUNT 2

(Failure to Provide Financial Assurance)

20. The allegations in Paragraphs 1 through 19, above, are incorporated herein by reference as though fully set forth at length herein.
21. 9 VAC § 25-590-40 provides, in pertinent part, that owners and operators of petroleum UST systems are required, with exceptions not relevant hereto, to demonstrate financial responsibility for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases arising from the operation of petroleum USTs.
22. Pursuant to 9 VAC § 25-590-50, and subject to the limitations set forth in 9 VAC § 25-590-40.A. and B., an owner or operator may demonstrate financial responsibility using any of the allowable mechanisms set forth in 9 VAC § 25-590-60 through 9 VAC § 25-590-120.
23. From approximately 4/1/07-1/26/12 Respondent's USTs were not exempt UST systems and Respondent did not demonstrate financial responsibility for USTs Nos. 1 through 5 by any of the methods set forth in 9 VAC § 25-590-60 through 9 VAC § 25-590-120.
24. Respondent's acts and/or omissions as alleged in Paragraph 23, above, constitutes a violation by Respondent of 9 VAC § 25-590-40 and 9 VAC § 25-590-50.

CERTIFICATION OF COMPLIANCE

25. As to all relevant provisions of RCRA and the Commonwealth of Virginia Authorized UST management program allegedly violated as set forth herein, Respondent certifies to EPA that, upon investigation, to the best of each Respondent's knowledge and belief, Respondent is currently in compliance with all such relevant provisions and regulations.

CIVIL PENALTY

26. In settlement of EPA's claims for civil monetary penalties assessable for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty of Eight Thousand Dollars (\$8,000.00), which Respondent agrees to pay in accordance with the terms set forth below.
27. The civil penalty of Eight Thousand Dollars (\$8,000.00) set forth in Paragraph 26, above, shall be paid in eight (8) installments with interest at the rate of one percent (1%) per annum on the outstanding principal balance in accordance with the following schedule:

1st Payment: The first payment in the amount of One Thousand Dollars

(\$1,000.00), consisting of a principal payment of \$1,000.00 and an interest payment of \$0.00, shall be paid within thirty (30) days of the date on which this CAFO is mailed or hand-delivered to Respondent;

2nd Payment: The second payment in the amount of One Thousand and Ten Dollars and twenty cents (\$1,010.20), consisting of a principal payment of \$ 992.64 and an interest payment of \$17.56, shall be paid no later than three (3) calendar months after the date on which this CAFO is mailed or hand-delivered to Respondent;

3rd Payment: The third payment in the amount of One Thousand and Ten Dollars and sixteen cents (\$1,010.16), consisting of a principal payment of \$ 994.81 and an interest payment of \$15.35, shall be paid no later than six (6) calendar months after the date on which this CAFO is mailed or hand-delivered to Respondent; and

4th Payment: The fourth payment in the amount of One Thousand and Ten Dollars and sixteen cents (\$1,010.16), consisting of a principal payment of \$ 997.51 and an interest payment of \$ 12.65, shall be paid no later than nine (9) calendar months after the date on which this CAFO is mailed or hand-delivered to Respondent.

5th Payment: The fifth payment in the amount of One Thousand and Ten Dollars and sixteen cents (\$1,010.16), consisting of a principal payment of \$ 999.82 and an interest payment of \$ 10.34, shall be paid no later than twelve (12) calendar months after the date on which this CAFO is mailed or hand-delivered to Respondent.

6th Payment: The sixth payment in the amount of One Thousand and Ten Dollars and sixteen cents (\$1,010.16), consisting of a principal payment of \$ 1,002.55 and an interest payment of \$ 7.61, shall be paid no later than fifteen (15) calendar months after the date on which this CAFO is mailed or hand-delivered to Respondent.

7th Payment: The seventh payment in the amount of One Thousand and Ten Dollars and sixteen cents (\$1,010.16), consisting of a principal payment of \$ 1,004.97 and an interest payment of \$ 5.19, shall be paid no later than eighteen (18) calendar months after the date on which this CAFO is mailed or hand-delivered to Respondent.

8th Payment: The eighth and final payment in the amount of One Thousand and Ten Dollars and sixteen cents (\$1,010.16), consisting of a principal

payment of \$ 1,007.70 and an interest payment of \$ 2.46, shall be paid no later than twenty-one (21) calendar months after the date on which this CAFO is mailed or hand-delivered to Respondent

28. Pursuant to the above schedule, Respondent will remit total principal payments for the civil penalty in the amount of Eight Thousand Dollars (\$8,000.00) and total interest payments in the amount of Seventy-One Dollars and Sixteen Cents (\$71.16) for a total payment in the amount of Eight Thousand Seventy-One Dollars and Sixteen Cents (\$8,071.16).
29. If Respondent fails to make one of the installment payments in accordance with the schedule set forth in paragraph 27, above, the entire unpaid balance of the penalty and all accrued interest shall become due immediately upon such failure, and Respondents 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.
30. Notwithstanding Respondent's agreement to pay the assessed civil penalty in accordance with the installment schedule set forth in Paragraph 27, above, Respondent may pay the entire civil penalty of Eight Thousand Dollars (\$8,000.00) within thirty (30) calendar days after the date on which a copy of this CAFO is mailed or hand-delivered to Respondent and, thereby, avoid the payment of interest pursuant to 40 C.F.R. § 13.11(a) as calculated in Paragraph 27, above, and as described in Paragraph 27. In addition, Respondent may, at any time after commencement of payments under the installment schedule, elect to pay the entire principal balance, together with accrued interest to the date of such full payment.
31. The aforesaid settlement amount was based upon Complainant's consideration of a number of factors, including, but not limited to, the statutory factors of the seriousness of Respondent's violations and any good faith efforts by Respondent to comply with all applicable requirements as provided in RCRA Section 9006(c), 42 U.S.C. § 6991e(c), and in accordance with EPA's Penalty Guidance for Violations of UST Regulations ("UST Guidance") dated November 4, 1990.
32. Respondent shall remit each installment payment for the civil penalty and interest, pursuant to Paragraph 27, above, and/or the full penalty pursuant to Paragraph 30, above, and/or any administrative fees and late payment penalties, in accordance with Paragraphs 38 and 39, below, in the following manner:
33. a. All payments shall be made to the "United States Treasury" by cashier's or certified check and sent by U.S Postal Service regular mail shall be addressed to:

US Environmental Protection Agency

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

The customer service contact for this address may be reached at 513-487-2105

- b. All payments made by check and sent by UPS, FedEx, or overnight mail delivery service (except as noted in section c, below) shall be addressed to:

U.S. Bank
Government Lockbox 979077
U.S. EPA, Fines & Penalties
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, MO 63101

The U.S. Bank customer service contact for overnight delivery is 314-418-1028.

- c. All payments made by check in any currency drawn on banks with no branches in the United States shall be addressed for delivery to the following address:

Cincinnati Finance
US EPA, MS-NWD
26 W. M.L. King Drive
Cincinnati, OH 45268-0001

- d. All payments made by electronic funds transfer ("EFT") shall be directed to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 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"

The Federal Reserve customer service contact may be reached at 212-720-5000.

- e. All electronic payments made through the Automated Clearinghouse

(“ACH”), also known as Remittance Express (“REX”), shall be directed to:

US Treasury REX / Cashlink ACH Receiver
ABA = 051036706
Account No.: 310006, Environmental Protection Agency
CTX Format Transaction Code 22 - Checking

Physical location of U.S. Treasury facility:
5700 Rivertech Court
Riverdale, MD 20737

Customer service contact: John Schmid, at 202-874-7026, or REX at 1-866-234-5681

f. On-line payment option

WWW.PAY.GOV

Enter “sfo 1.1” in the search field. Open and complete the form.

g. Additional payment guidance is available at:

http://www.epa.gov/ocfo/finservices/payment_instructions.htm

34. All payments by Respondent shall include Respondent’s full name and address and the EPA Docket Number of this Consent Agreement (**RCRA-03-2013-0016**).

35. At the time of payment, Respondent shall send a notice of such payment, including a copy of the check, EFT authorization or ACH authorization, as appropriate to:

Lydia Guy
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region III (Mail Code 3RC00)
1650 Arch Street
Philadelphia, PA 19103-2029

and

Benjamin M. Cohan
Sr. Assistant Regional Counsel
U.S. Environmental Protection Agency
Region III (Mail Code 3RC50)
1650 Arch Street

Philadelphia, PA 19103-2029

36. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, EPA is entitled to assess interest, administrative costs 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.
37. In accordance with 40 C.F.R. § 13.11(a), interest on any civil penalty assessed in a Consent Agreement and Final Order begins to accrue on the date that a copy of the Consent Agreement and Final Order is mailed or hand-delivered to the Respondent. However, EPA will not seek to recover interest on any amount of such civil penalty 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).
38. The costs of the Agency'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 - Cash 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.
39. A late payment penalty of six percent (6%) per year will be assessed monthly on any portion of a civil penalty which remains delinquent more than ninety (90) calendar days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on a debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d).

RESERVATION OF RIGHTS

40. Nothing herein shall be construed to limit the authority of the Complainant to undertake action against any person, including the Respondent, in response to any condition which Complainant determines may present an imminent and substantial endangerment to the public health, public welfare or the environment, nor shall anything in this Consent Agreement and the attached Final Order be construed to limit the United States' authority to pursue criminal sanctions against any person or entity. In addition, Complainant reserves any rights and remedies available to it under RCRA, the regulations promulgated thereunder, and any other federal laws or regulations for which Complainant has jurisdiction, to enforce the provisions of this CA/FO, following its filing with the Regional Hearing Clerk.
- 40(a). The undersigned representative of Respondent certifies that he is fully authorized to enter into the terms and conditions of this CA and bind Respondent hereto.

FULL AND FINAL SATISFACTION

41. EPA hereby agrees and acknowledges that the settlement of the proposed penalty as set forth above shall be in full and final satisfaction of all civil claims for penalties which EPA may have under Sections 9006(a) of RCRA for the violations alleged herein.

EFFECTIVE DATE

42. The effective date of this CA/FO is the date on which the Final Order, signed by the Regional Administrator or the Regional Judicial Officer, is filed with the Regional Hearing Clerk.

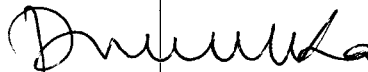
For Respondent:

Idas LLC, Inc.

Date:

9/28/12

By:



Daniel Moreka
President

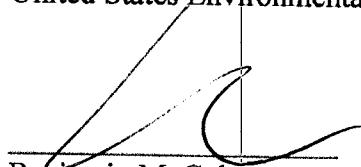
For Complainant:

United States Environmental Protection Agency, Region III

Date:

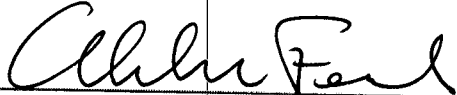
9/27/12

By:


Benjamin M. Cohan
Sr. Assistant Regional Counsel

After reviewing the foregoing Consent Agreement and other pertinent information, the Director, Land and Chemicals Division, EPA Region III, recommends that the Regional Administrator or the Regional Judicial Officer issue the Final Order attached hereto.

Date: 10/11/12


Abraham Ferdas, Director
Land and Chemicals Division
EPA Region III

**BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III**

In the Matter of:

Idas LLC
2869 Broad Rock Blvd
Richmond, VA 23224

U.S. EPA Docket Number
RCRA-03-2013-0016

RESPONDENT

BP Amoco and/or Broad Rock BP
2869 Broad Rock Blvd
Richmond, VA 23224

FACILITY

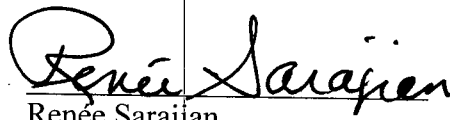
FINAL ORDER

Complainant, the Director, Land and Chemicals Division, U.S. Environmental Protection Agency - Region III, and Respondent, Idas, LLC ("Respondent"), have executed a document entitled "Consent Agreement" which I hereby ratify as a Consent Agreement 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 terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated herein as if set forth at length.

NOW, THEREFORE, PURSUANT TO Section 22.18(b)(3) of the *Consolidated Rules of Practice* and Section 9006(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6991e(a) ("RCRA"), and having determined, based on the representations of the parties in the attached Consent Agreement, that the civil penalty agreed to therein was based upon a consideration of the factors set forth in Section 9006(c)-(e) of RCRA, 42 U.S.C. § 6991e(c)-(e), **IT IS HEREBY ORDERED** that Respondent pay a civil penalty of Eight Thousand Dollars (\$8,000.00) in accordance with the terms and conditions of the Consent Agreement.

The effective date of this Final Order and the accompanying Consent Agreement is the date on which the Final Order, signed by the Regional Administrator of U.S. EPA Region III or the Regional Judicial Officer, is filed with the Regional Hearing Clerk of U.S. EPA - Region III.

Date: 10/25/12


Renee Sarajian
Regional Judicial Officer
U.S. EPA, Region III

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III
1650 Arch Street

Philadelphia, Pennsylvania 19103-2029

REGIONAL HEARING CLERK
EPA REGION III, PHILA. PA

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IN RE:

Idas LLC
2869 Broad Rock Blvd
Richmond, VA 23224

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Docket No: RCRA-03-2013-0016

Consent Agreement

Respondent

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the date provided below, I hand-delivered and filed the original of the above captioned United States Environmental Protection Agency's Consent Agreement and Final Order, with the Regional Hearing Clerk, EPA Region III, 1650 Arch Street, Philadelphia, Pennsylvania 19103-2029, and that true and correct copies of the Consent Agreement, along with its enclosures and/or attachments, were sent by certified mail, return receipt requested, to:

Daniel Moreka, President
Idas, LLC
2869 Broad Rock Blvd
Richmond, VA 23224

Sincerely,


Benjamin M. Cohan
Senior Assistant Regional Counsel

10/26/12