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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7  
11201 RENNER BOULEVARD  
LENEXA, KANSAS 66219

IN THE MATTER OF:

Harcros Chemicals Inc.  
5200 Speaker Road  
Kansas City, Kansas 66106

RCRA I.D. No. KST210010062

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-07-2014-0020

**I. PRELIMINARY STATEMENT**

The United States Environmental Protection Agency (EPA), Region 7 (Complainant) and Harcros Chemicals Inc. (Harcros or 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).

**II. ALLEGATIONS**

**A. 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 (HSWA), 42

U.S.C. § 6928(a) and (g), and in accordance with the Consolidated Rules of Practice at 40 C.F.R. Part 22.

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

### **B. Complainant's Conclusions of Law**

3. Respondent is a "person" as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15) and 40 C.F.R. § 260.10, as incorporated by reference at KAR 28-31-260(a).

4. Since October 2001, Harcros has been "owner" and "operator" of the Facility at 5200 Speaker Road, Kansas City, Kansas ("Facility") within the meaning of 40 C.F.R. § 260.10, which is incorporated by reference at KAR 28-31-260(a). The facility is a "hazardous waste facility" as that term is defined in KSA 65-3430(f).

5. Harcros is a "generator" of "hazardous wastes" as those terms are defined in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5), 40 C.F.R. § 260.10. Based on notifications received from the facility, Harcros was a "large quantity generator" during the following dates: from November 2008 until January 2010, in August 2011, in December 2012, from July 2014 until September 2014, and from April 2014 to September 15, 2015. At all other times, Harcros was a "small quantity generator" as defined at KAR 28-31-260(a)(8).

### **C. Parties**

6. The Complainant is the United States Environmental Protection Agency, Region  
7. The Chief of the Waste Enforcement and Materials Management Branch has been duly delegated the authority to enter into the settlement set forth in this CA/FO.

7. The Respondent is Harcros Chemicals Inc., a Kansas corporation in good standing.

**D. Statutory and Regulatory Framework**

8. The State of Kansas is authorized to administer its own hazardous waste program in the State of Kansas pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926. Kansas has promulgated regulations that incorporate by reference EPA's RCRA regulations and impose additional requirements. *See* KAR 28-31-4 through 28-31-279a.<sup>1</sup> 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 of RCRA, 42 U.S.C. § 6928.

9. 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 now authorized for violations of Subchapter III of RCRA that occurred after January 12, 2009.

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1. The most recent program revisions resulted in a change in the numbering scheme for the Kansas RCRA regulations. The regulatory citations in this CA/FO are to the current Kansas regulations, which are substantially identical to the regulations that were in place at the time of the violations alleged in this CA/FO.

**E. Complainant's Factual Allegations**

10. Harcros manufactures industrial chemicals, primarily surfactants, anti-foaming agents and emulsifiers. It also packages a number of chemicals, including surfactants and non-chlorinated solvents from bulk (storage tank, rail car or tank car) into drums or totes. From about 1960 until 1977, a prior owner of the Facility manufactured pesticides at the Facility, including 2, 4-D, Silvex, and 2, 4, 5-T. Harcros has never formulated pesticides or manufactured or distributed perchloroethylene. Harcros also operates on-site laboratories at the Facility for development and testing of new products. The products manufactured by Harcros at the Facility include non-ionic alkoxyates, alkanolamides, calcium and amine sulfates, ether sulfates, phosphate esters and specialized foamers.

11. The regulations for determining whether a solid waste is a hazardous waste are set forth at 40 C.F.R. § 262.11, as incorporated by reference at KAR 28-31-262. First, the generator must determine if the waste is excluded from regulation under 40 C.F.R. § 261.4, also set forth at KAR 28-31-261. If the waste is not excluded, the generator must determine if the waste has been listed by EPA as a hazardous waste in Subpart D and the appendices of 40 CFR part 261, some of which are incorporated by reference at KAR 28-31-261, or whether the waste exhibits one of the hazardous characteristics of ignitability, reactivity, corrosivity, or toxicity, using the tests set forth in Subpart C of 40 C.F.R., Part 261, as incorporated at KAR 28-31-261. Hazardous wastes are assigned waste code numbers.

12. As part of its operations, Respondent generates or generated and/or previous owners of the Facility generated the following characteristic and listed hazardous wastes:

- a. Previous owners of the facility generated the following wastes prior to Respondent's purchase of Facility in October 2001: D004, D010, D012,

D013, D014, D015, D017, D018, D020, D029, D031, D039, D040, D041,  
D042, D043, F003, F027, P004, P028, P059, U036, U059, U060, U061,  
U210, U213, U226, U227, U228, and U239.

- b. The following non-laboratory wastes were generated by Respondent:  
D001, D002, D003, D008, D009, F020, P095, U002, U003, U031, U041,  
and U240.
- c. The following laboratory wastes were generated by Respondent: D007,  
D016, D022, D028, D035, F002, F005, P030, U044, U196, and U220.

13. On or about December 17, 19 and 22, 2008, a KDHE inspector conducted a RCRA Compliance Evaluation Inspection at Respondent's facility (the 2008 KDHE inspection).

### **III. RCRA Violations**

#### **A. Failure to perform hazardous waste determinations**

14. At the time of the 2008 KDHE inspection, Respondent had failed to perform hazardous waste determinations on the following wastes:
- a. Five four-liter glass jars marked as "organic waste" which were located under a fume hood in a laboratory in the Lab Tech Building. These wastes were ultimately combined in a lab pack and shipped off-site under the hazardous waste code U225.
  - b. Three drums labeled as "mystery drums" located in the Formulation Building waste area. These drums were subsequently shipped off-site and the waste profile information indicated that the drums contained hazardous wastes exhibiting the hazardous characteristic of ignitability (waste code D001).

- c. Ten drums of raw material which were stored at the Liquid Blending Plant, initially designated as “heavy duty barge cleaner” (which Respondent asserts was a mixture of various non-ionic surfactant materials). However, these drums did not match the waste profile for heavy duty barge cleaner when sent to the disposal facility and were ultimately disposed as ignitable hazardous waste (D001).
- d. Material located within a vault described in Paragraph 19 below which exhibited the hazardous characteristic of toxicity for tetrachloroethylene (D039) and trichloroethylene (D040).

15. At the time of the 2008 KDHE inspection, Respondent’s hazardous waste notification on file with the KDHE indicated that the facility was a “large quantity generator,” i.e., that the facility generates more than 1,000 kilograms of hazardous waste per month.

**B. Operating a hazardous waste storage and treatment facility without a permit**

**1. Operating a hazardous waste storage facility without a permit**

**i. Storage in the vault**

16. Respondent’s predecessors operated an on-site process sewer system to convey wastewaters, washout waters and runoff to various lift stations and tanks. Among these structures is a concrete vault (vault) located just west of the Boiler House. When Respondent purchased the Facility, this vault had previously been taken out of service.

17. The vault is approximately twenty feet in diameter and fourteen feet deep, and is constructed of reinforced concrete. The vault was designed by a prior owner to carry wastewater to a now-closed surface impoundment.

18. In 2009, Respondent decided to backfill the vault for safety reasons.

19. In May 2009, Respondent hired a contractor to remove approximately 3,452 gallons of liquid from the vault and to ship the waste off-site as a non-hazardous waste after being tested for the hazardous characteristics of flammability and corrosivity. Respondent has stated that the sediment beneath the liquid was left in place.

20. Shortly after the vault cleanout, Respondent stated that the vault was refilled with a variety of available materials, including the contents of approximately twenty 55-gallon drums containing trench cleanout material, ten truckloads of purchased sand, asphalt chunks and concrete pieces. Backfilling the vault was completed by placing a layer of rock on top of the sand, then pouring an asphalt patch to match the surrounding apron. The work described in this Paragraph was completed in late July or early August of 2009.

21. In July 2011, Complainant obtained several samples from the vault. The samples were analyzed to determine whether the vault contents exhibited the toxicity characteristic for metals, volatile and semi-volatile organic compounds using the toxicity characteristic leaching procedure (TCLP). Two of the samples exceeded the TCLP limits for D039 and D040, and another sample exceeded TCLP limits for D039. A day later, also in July, 2011, the facility obtained two samples from the vault from the depth horizon where field screening identified elevated levels of organic vapors. One sample exceeded the TCLP limit for D039. While other volatile organic hazardous waste constituents were not detected, the method reporting limit was at or above the TCLP regulatory level for benzene, carbon tetrachloride, 1,2-dichloroethane, trichloroethylene, and vinyl chloride for this sample.

22. In May 2013, additional sampling of the vault contents showed the presence of D039 and D040. Other detected hazardous constituents included several metals, volatile and semi-volatile organic compounds and 2,3,7,8-TCDD (dioxin).

23. A sample of the liquid from the vault obtained by Respondent in December 2013 showed the presence of vinyl chloride (D043), D039 and D040. Another sample of liquid obtained by Respondent in April 2014 showed the presence of D043 and D039.

24. The analytical results described in Paragraphs 21 through 23 demonstrate that Respondent had stored hazardous waste in the vault for more than 90 days.

**ii. Illegal storage noted during the KDHE inspection**

25. At the time of the KDHE inspection, Harcros had stored or was storing hazardous waste for over 90 days at various locations throughout the facility, including:

- a. Ten drums of hazardous waste bearing the waste code D001 from the cleanup of a spill of N-butanol that occurred on April 4, 2008, which were not shipped off -site until October 9, 2008; and
- b. Approximately 1,500 pounds of debris contaminated with D001 hazardous waste from the cleanup of a spill. The cleanup materials were generated on May 29, 2007 and were not shipped off-site until September 5, 2007.

26. Respondent does not have a permit for the storage of hazardous waste; however, Respondent may temporarily accumulate hazardous waste in accordance with 40 C.F.R. §262.34.

27. Respondent's storage of hazardous waste at its facility as set forth in Paragraphs 21 through 26 above is a violation of Section 3005(a) of RCRA and of KSA Section 65-3437.

**2. Failure to comply with generator requirements**

28. In addition to illegally storing hazardous waste for over 90 days, Harcros failed to meet applicable federal and State regulatory requirements at the time of the KDHE Inspection. These requirements are listed at 40 C.F.R. § 262.34 (a), and constitute conditions precedent to large quantity generators being allowed to accumulate hazardous waste at their facility for up to



90 days without a permit. Failure to comply with these conditions means that a facility is not allowed to store hazardous waste for any length of time.

29. The specific requirements Respondent failed to meet are:
- a. Respondent failed to describe the arrangements agreed to by local authorities in the facility contingency plan, failed to list emergency equipment in the contingency plan, and failed to include the home address of the emergency coordinators in the contingency plan as required by 40 C.F.R. § 262.34 (a)(4), referencing 40 C.F.R. § 265.37 and 40 C.F.R. § 265.52, and KAR 28-31-262(a) and
  - b. Respondent failed to maintain an adequate personnel training program, including failure to have a person trained in hazardous waste management in charge of the program, failure to keep personnel training records that included the job title for each position responsible for hazardous waste management and the name of each person filling each of these jobs, and failure to maintain job descriptions for each position that includes a description of the hazardous waste duties as required by 40 C.F.R. § 262.34(a)(4), referencing 40 C.F.R. § 265.16 and KAR 28-31-262 (a).

**3. Operating a hazardous waste treatment facility without a permit**

30. After the May 2013 sampling results showed that the vault contained hazardous waste, Respondent proposed in-situ treatment of the vault contents, and Complainant requested a work plan for the proposed activities.

31. After reviewing Respondent's work plan, Complainant concluded that the proposed activities could not be carried out under the RCRA regulations.

32. Complainant communicated to counsel for the Respondent that EPA would not approve the in-situ treatment plan. This communication took place shortly before the date the facility indicated that treatment would begin; nevertheless, Respondent had already begun activities associated with the in-situ treatment of the wastes and the treatment proceeded. Complainant subsequently sent Respondent a letter formally disapproving the plan.

33. Section 3005 of RCRA, 42 U.S.C. § 6925(a), and Kansas Statutes Annotated (KSA) Section 65-3437 both provide that operators of hazardous waste treatment facilities must have a permit for these activities.

34. Respondent has never obtained a permit or approval for the treatment of hazardous waste at its Speaker Road facility.

35. Respondent's treatment of hazardous waste in the vault at the facility is a violation of Section 3005(a) of RCRA and of KSA Section 65-3437.

36. For the violations of RCRA described in Paragraphs 14 through 35 above, Complainant has assessed a civil administrative penalty of \$175,157.00.

#### **IV. CONSENT AGREEMENT**

1. Respondent and EPA agree to the terms of this 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 Final Order portion of the CA/FO.

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

6. This CA/FO 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.

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 the Respondent to it.

9. Respondent agrees that, in settlement of the claims alleged in this CA/FO, Respondent shall pay a civil administrative penalty of \$ 175,157.00 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 Consent Agreement and the Final Order shall remain in full force and effect until Complainant provides Respondent with written notice, in accordance with Paragraph 8 of the Final Order, that all requirements hereunder have been satisfied, except that Complainant's reservation set forth in Paragraph 19 below remains in effect until Complainant provides Respondent with written notification that the reservation is withdrawn.

13. By its signature on this Consent Agreement, Respondent certifies, to the best of its knowledge, that it is currently in compliance with RCRA at the Facility at 5200 Speaker Road, Kansas City, Kansas, except for the compliance actions required by the Final Order. In addition, EPA acknowledges that Respondent is performing RCRA corrective action at the facility pursuant to Administrative Order on Consent Docket No. VII-90-H-0028 and the amendments thereto.

**A. 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. According to Respondent, in approximately December 2008, an independent contractor performed repair work on portions of the railroad tracks on the northwest side of the Harcros facility. During the repair work, some asphalt and ballast near each of the tracks was removed and replaced. When the repair work was completed, the ballast was spread on the ground by the contractor in a grassy area immediately to the west of the edge of the concrete cap on the northwest side of the facility. Also at about the same time, the contractor piled the removed asphalt on top of the western edge of the concrete cap northwest of the facility's Formulation Building. In 2010 or 2011, another independent contractor buried all of the removed asphalt in the grassy area immediately west of where it had been piled up on the concrete cap. In mid-2012, Harcros's management discovered that these 2010 or 2011 actions had taken place and

reported it to EPA and to KDHE. EPA later obtained soil samples from the area where the asphalt was buried and where the ballast had been spread on the ground.

19. Because the area where the asphalt is buried and the area where the ballast is spread on the ground have not been completely investigated, the EPA reserves its right to take any appropriate enforcement action against Respondent with respect to these two areas until such time as the Respondent is bound by an enforceable instrument or agreement, including but not limited to a corrective action order, a closure and/or post-closure order or permit, or any other enforceable order or agreement with KDHE or EPA that addresses these areas. Respondent and Complainant agree that, for purposes of any such enforcement action by EPA, the statute of limitations regarding the disposal of the asphalt and the placement of the ballast on the ground as described in Paragraph 18 above shall be tolled until such time as EPA provides Respondent with a written notice that this reservation has been withdrawn. Written notice that the reservation has been withdrawn will be provided at any time upon a demonstration by Respondent that an enforceable instrument or agreement as described above is in place. Written notice of termination of the Final Order shall be in accordance with Paragraph 8 of the Final Order.

20. Except as expressly provided herein, Respondent reserves all of its defenses, rights and claims.

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

## **V. FINAL ORDER**

1. 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**

2. Within thirty (30) days of the effective date of this CA/FO, Respondents will pay a civil penalty of \$ 175,157.00.

3. Payment of the penalty shall be made either by cashier or certified check or by wire transfer. If made by cashier or certified check, the check shall be made payable to

“Treasurer of the United States” and remitted to:

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

Wire transfers shall be directed to the Federal Reserve Bank of New York as

follows:

Federal Reserve Bank of New York  
ABA = 021030004  
Account = 68010727  
SWIFT address = FRNYUS33  
33 Liberty Street  
New York, New York 10045

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

The Docket Number of this matter shall be referenced on the check or transfer. A copy of the check or transfer shall also be mailed to EPA’s representative identified in Paragraph 5.c. of the Final Order below, and to:

Belinda Holmes, Senior Counsel  
CNSL/CMBR  
U.S. EPA 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 CA/FO shall be claimed by Respondents as a deduction for federal, state, or local income tax purposes.

**B. Compliance Actions**

5. Within the time frames below, Respondents shall perform the following compliance actions:

- a. Within sixty (60) days of the effective date of this CA/FO, Respondent shall develop a standard operating procedure for the completion of hazardous waste determinations for solid wastes generated at the facility, at the point of generation. The SOP shall be sent to EPA's representative identified in Paragraph 5.c. below. The SOP will be reviewed and approved in accordance with the procedures set forth in Paragraph 6 below.
- b. Immediately upon the effective date of this CA/FO, Respondent shall cease in-situ treatment of the waste in the concrete vault, and shall, within forty-five (45) days of the effective date of this CA/FO, commence implementation of August 28, 2015 addendum to the of the November 13, 2012 Quality Assurance Sampling and Analysis Plan (as approved by EPA with comments in a letter dated October 27, 2015) for the Excavation of the Concrete Vault (Plan) in accordance with the schedules contained therein.
- c. All submissions required pursuant to this Paragraph shall be sent to:



Elizabeth Koesterer, Environmental Engineer  
U.S. Environmental Protection Agency, Region 7  
Mail code AWMD/WEMM  
11201 Renner Boulevard  
Lenexa, Kansas 66219

- d. Respondent may request modifications to the schedule in the approved Plan for delays due to inclement weather. Such requests must be sent in writing to the representative identified in Paragraph 5.c. above for written approval.

6. The SOP required by Paragraph 5.a. above shall be reviewed by EPA's representative identified in Paragraph 5.c. The EPA may approve the document, approve it with comments, or provide comments to be addressed by Respondent in a revised document. If EPA approved the document with comments, Respondent shall implement the SOP in accordance with EPA's comments. If EPA provides comments and requests a revision, Respondent shall address EPA's comments and resubmit the document. Failure to address EPA comments upon resubmission of the document will result in EPA modifying the plan in accordance with its previous comments, and Respondent shall implement the plan as modified by EPA.

#### **C. Parties Bound**

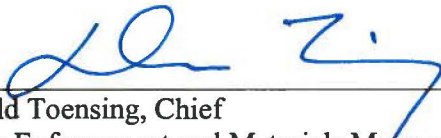

7. This Final Order portion of this CA/FO shall apply to and be binding upon Respondent and Respondent's agents, successors and/or assigns. Respondent shall ensure that all contractors, employees, consultants, firms, or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this CA/FO.

#### **D. Termination**

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

FOR COMPLAINANT:

U.S. ENVIRONMENTAL PROTECTION AGENCY

<u>12-2-15</u> Date	 Donald Toensing, Chief Waste Enforcement and Materials Management Branch Air and Waste Management Division
<u>12-3-15</u> Date	 Belinda L. Holmes Senior Counsel Chemical Management Branch Office of Regional Counsel

FOR RESPONDENT

Harcros Chemicals Inc.:

Date

Dec 1<sup>st</sup>, 2015

Signature



Printed Name

Peter Radford

IT IS SO ORDERED. This Final Order shall become effective immediately.

12-8-2015  
Date

Karina Borromeo  
Karina Borromeo  
Regional Judicial Officer

IN THE MATTER Of Harcros Chemicals Inc., Respondent  
Docket No. RCRA-07-2014-0020

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:

[holmes.belinda@epa.gov](mailto:holmes.belinda@epa.gov)

Copy by First Class Mail and email to Respondent:

Doug Curran, Esq.

Stinson Leonard Street LLP

1201 Walnut Street

Suite 2900

Kansas City, Missouri 64106

[doug.curran@stinsonleonard.com](mailto:doug.curran@stinsonleonard.com)

Dated: 12/8/15



Kathy Robinson  
Hearing Clerk, Region 7