

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

Received by
EPA Region 7
Hearing Clerk

In the Matter of:)
)
 Heritage Environmental Services,) **Docket No. RCRA-07-2023-0034**
 LLC)
)
 Respondent)
 _____)

CONSENT AGREEMENT AND FINAL ORDER

PRELIMINARY STATEMENT

The U.S. Environmental Protection Agency (EPA), Region 7 (“Complainant”) and Heritage Environmental Services, LLC (“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).

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 in accordance with the Consolidated Rules of Practice.

2. This Consent Agreement and Final Order serves as notice that the EPA has reason to believe that Respondent violated Missouri Revised Statutes 260.370, Sections 3002 and 3005 of RCRA, 42 U.S.C §§ 6922 and 6925, and Missouri regulations which incorporate the following federal regulations by reference, the standards applicable to generators of hazardous waste (40 C.F.R. § 262), the standards for owners and operators of hazardous waste treatment, storage, and disposal facilities (40 C.F.R. § 264), and the standards for universal waste management (40 C.F.R. § 273).

Parties

3. Complainant is the Chief of the Chemical Branch, Enforcement and Compliance Assurance Division, Region 7, as duly delegated by the Administrator of EPA.

4. Respondent is Heritage Environmental Services, LLC, a company authorized to operate under the laws of Missouri.

Statutory and Regulatory Framework

5. RCRA was enacted to address the volumes of municipal and industrial solid waste generated nationwide in order to protect human health and the environment from potential hazards of waste disposal, conserve energy and natural resources, reduce the amount of waste generated, and ensure that wastes are managed in an environmentally sound manner.

6. RCRA provides guidelines for a waste management program and provides EPA with the authorities found in Sections 2002, 3002, 3004, and 3005 of RCRA, 42 U.S.C. §§ 6912, 6922, 6924, and 6925, to develop and promulgate specific requirements in order to implement the waste management program. Pursuant to these authorities, EPA promulgated the waste management regulations found at 40 C.F.R. Parts 262, 264, 265, and 273.

7. 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).

8. Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), authorizes a civil penalty of not more than \$25,000 per day for each violation. The Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, 28 U.S.C. § 2461, and implementing regulations at 40 C.F.R. Part 19, increased these statutory maximum penalties to \$37,500 for violations that occurred before November 2, 2015, and to \$109,024 for violations that occur after November 2, 2015, and for which penalties are assessed on or after January 12, 2022. In assessing any such penalty, EPA must take into account the seriousness of the violation and any good faith efforts to comply with applicable requirements. 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), Complainant and Respondent agree to the payment of a civil penalty pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), and to take the actions required by the Final Order, for the violations of RCRA alleged in this Consent Agreement and Final Order.

9. Section 3002 of RCRA, 42 U.S.C. § 6922, requires the Administrator to promulgate regulations establishing such standards applicable to generators of hazardous waste identified or listed under this subchapter, as may be necessary to protect human health and the environment.

10. 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.

11. Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), defines “person” as an individual, trust, firm, joint stock company, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body and shall include each department, agency, and instrumentality of the United States.

12. The regulation at 40 C.F.R. § 260.10 defines “facility” to include all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste, or for managing hazardous secondary materials prior to reclamation. A facility may consist of several treatment, storage or disposal operational units (e.g. one or more landfills, surface impoundments, or combinations of them).

13. The regulation at 40 C.F.R. § 260.10 defines “storage” as the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.

14. The regulation at 40 C.F.R. § 260.10 defines “disposal” as the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

15. “Solid waste” is defined at 40 C.F.R § 261.2.

16. “Hazardous waste” is defined at 40 C.F.R. § 261.3.

17. The regulation at 40 C.F.R. § 260.10 defines “generator” as any person, by site, whose act or process produces hazardous waste identified or listed in part 261 of this chapter or whose act first causes a hazardous waste to become subject to regulation.

18. The regulation at 40 C.F.R. § 260.10 defines “container” as any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled.

19. The regulation at 40 C.F.R. § 260.10 defines “EPA identification number” to mean the number assigned by EPA to each generator, transporter, and treatment, storage, or disposal facility.

20. The regulation at 40 C.F.R. § 260.10 defines “incompatible waste” to mean a hazardous waste which is unsuitable for: (1) placement in a particular device or facility because it may cause corrosion or decay of containment materials (e.g., container inner liners or tank walls); or (2) commingling with another waste or material under uncontrolled conditions because the commingling might produce heat or pressure, fire or explosion, violent reaction, toxic dusts, mists, fumes, or gases, or flammable fumes or gases.

21. The regulation at 40 C.F.R. § 260.10 defines “lamp,” also referred to as “universal waste lamp,” to mean the bulb or tube portion of an electric lighting device. A lamp is specifically designed to produce radiant energy, most often in the ultraviolet, visible, and infrared regions of the electromagnetic spectrum. Examples of common universal waste electric lamps include, but are not limited to, fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps.

22. The regulation at 40 C.F.R. § 260.10 defines “operator” to mean the person responsible for the overall operation of a facility.

23. The regulation at 40 C.F.R. § 260.10 defines “owner” to mean the person who owns a facility or part of a facility.

24. The regulation at 40 C.F.R. § 260.10 defines “large quantity generator” as a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste or greater than 1 kilogram (2.2 pounds) of acute hazardous waste listed in 40 C.F.R. §§ 261.31 or 261.33(e).

General Factual Background

25. Respondent is a company 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).

26. Respondent owns and operates a facility is located at 8525 NE 38th Street, Kansas City, MO (“facility”). Respondent receives from off-site, stores, and treats hazardous and non-hazardous waste at its facility. Respondent employs approximately 22 people.

27. On or about August 27, 2019, Respondent obtained a hazardous waste management facility permit from the state of Missouri.

28. On or about February 28, 2022, Respondent notified the state of Missouri, pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930, as a Large Quantity Generator (LQG) of hazardous waste, a large quantity handler of universal waste, and a co-generator of used oil, pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930.

29. On or about July 26 and 27, 2022, EPA inspectors conducted a RCRA Compliance Evaluation Inspection (hereinafter “the inspection”) of the hazardous waste management practices at Respondent’s facility. 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 a Large Quantity Generator of hazardous waste, hazardous waste transfer facility, hazardous waste processor, storer, disposer, and used oil marketer, large quantity handler of universal waste, and a co-generator of used oil.

30. Respondent has been assigned the following EPA Identification Number: MOD981505555.

Violations

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

Count 1

Failure to Minimize the Possibility of Any Unplanned Release

32. Complainant hereby incorporates the allegations contained in Paragraphs 25 through 30 above, as if fully set forth herein.

33. General Permit Condition I, incorporating the regulation at 40 C.F.R. § 264.31, requires that facilities must be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

34. At the time of the inspection, Respondent failed to securely fasten manways on Tanks 1 and 2.

35. Because Respondent failed to securely fasten manways on Tanks 1 and 2, Respondent failed to design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, and was therefore in violation of General Permit Condition I and 40 C.F.R. § 264.31.

Count 2

Failure to Inspect Daily

36. Complainant hereby incorporates the allegations contained in Paragraphs 25 through 30 above, as if fully set forth herein.

37. Special Permit Condition III.H.2 requires that Respondent shall inspect at least once each operating day: (a) above ground portions of the tank systems to detect corrosion or

releases of waste; (b) data gathered from monitoring and leak detection equipment to ensure the tank system is being operated according to its design, and (c) the construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste.

38. At the time of the inspection, Respondent failed to conduct inspections on weekends and holidays for a span of approximately five years.

39. Respondent's failure to conduct daily inspections is a violation of Special Permit Condition III.H.2.

Count 3
Failure to Equip Open-Ended Valves

40. Complainant hereby incorporates the allegations contained in Paragraphs 25 through 30 above, as if fully set forth herein.

41. Special Permit Condition IV.A, incorporating the regulation at 40 C.F.R. § 264.1056, requires that each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve.

42. At the time of the inspection, Respondent had, at the Facility, an open-ended wand attached to a hose used for transporting liquid hazardous waste. The wand did not have a cap, blind flange, plug, or second valve attached to it and was emitting organic vapors.

43. Respondent's failure to equip an open-ended wand with a cap, blind flange, plug, or second valve is a violation of Special Permit Condition IV.A and 40 C.F.R. § 264.1056.

Count 4
Failure to Properly Manage Containers Not Covered by a RCRA Permit or RCRA Interim Status

44. Complainant hereby incorporates the allegations contained in Paragraphs 25 through 30 above, as if fully set forth herein.

45. Section 3005 of RCRA, 42 U.S.C. § 6925, Missouri Revised Statutes 260.390.1(1), and the regulations at 40 C.F.R. Part 270 require each person owning or operating a facility for the treatment, storage, or disposal of hazardous wastes identified or listed under Subchapter C of RCRA to have a permit or interim status for such activities.

46. At the time of the inspection, Respondent did not have a permit or interim status for the waste streams identified below.

Generator Requirements

47. The regulation at 10 CSR 25-5.262(1), incorporating 40 C.F.R. § 262.34(a), states that a generator may accumulate hazardous waste on-site without a permit for 90 days or less, provided that, among other things, the generator complies with the requirements for owners or operators in Subparts C and D in 40 C.F.R. Part 265, and the generator complies with Subpart I of 40 C.F.R. Part 265. At the time of the inspection, Respondent did not meet the following conditions:

Failure to close hazardous waste accumulation containers

48. The regulation at 40 C.F.R. § 262.34(c), incorporating 40 C.F.R. § 265.173(a), requires that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

49. At the time of the inspection, Respondent failed to close a satellite accumulation container holding organic solid hazardous waste, contaminated debris, and personal protective equipment.

50. Respondent's failure to close a satellite accumulation container is a violation of 40 C.F.R. § 265.173(a) and therefore 40 C.F.R. § 262.34(c).

Minimize release

51. The regulation at 40 C.F.R. § 262.34(a)(1)(i), incorporating 40 C.F.R. § 265.31, requires that facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

52. At the time of the inspection, Respondent stored a container of acidic hazardous waste next to a container of caustic hazardous waste.

53. Acidic hazardous waste and caustic hazardous waste are incompatible wastes pursuant to 40 C.F.R. § 260.10.

54. Respondent's storing of incompatible hazardous wastes next to each other is a violation of 40 C.F.R. § 265.31 and therefore of 40 C.F.R. § 262.34(a)(1)(i).

55. Because Respondent failed to comply with the generator requirements as set forth in Paragraphs 45 through 54 above, Respondent was not authorized to accumulate 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, 42 U.S.C. § 6925.

Count 5
Failure to Comply with Universal Waste Management Requirements

56. Complainant hereby incorporates the allegations contained in Paragraphs 25 through 30 above, as if fully set forth herein.

Failure to label universal waste containers

57. The regulation at 10 CSR 25-16.273(1), incorporating 40 C.F.R. § 273.34(e), requires large quantity handlers of universal waste to clearly label or mark each lamp or container or package in which such lamps are contained with one of the following phrases: “Universal Waste—Lamp(s)” or “Waste Lamp(s),” or “Used Lamp(s).”

58. At the time of the inspection, one 4-foot-long box of spent fluorescent lamps was not properly labeled or marked.

59. Respondent’s failure to properly label the universal waste lamp containers described above is a violation of 40 C.F.R. § 273.34(e) and therefore of 10 CSR 25-16.273(1).

CONSENT AGREEMENT

60. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:

- (a) admits the jurisdictional allegations set forth herein;
- (b) neither admits nor denies the specific factual allegations stated herein;
- (c) consents to the assessment of a civil penalty, as stated herein;
- (d) consents to the issuance of any specified compliance or corrective action order;
- (e) consents to any conditions specified herein;
- (f) consents to any stated Permit Action;
- (g) waives any right to contest the allegations set forth herein; and
- (h) waives its rights to appeal the Final Order accompanying this Consent Agreement.

61. 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 specified herein.

62. Respondent and EPA agree to the terms of this Consent Agreement and Final Order and Respondent agrees to comply with the terms specified herein.

63. Respondent and EPA agree to conciliate this matter without the necessity of a formal hearing and to bear their respective costs and attorneys' fees.

64. Respondent consents to receiving an electronic copy of the filed Consent Agreement and Final Order at the following email address: *aalavi@heritage-enviro.com*.

Penalty Payment

65. Respondent agrees that, in settlement of the claims alleged herein, Respondent shall pay a civil penalty of seventy-four thousand and ninety-five dollars (\$74,095), as set forth below.

66. Respondent shall pay the penalty within thirty (30) days of the effective date of the Final Order. Such payment shall identify Respondent by name and docket number and shall be by certified or cashier's check made payable to the "United States Treasury" and sent to:

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

or by alternate payment method described at <http://www.epa.gov/financial/makepayment>.

67. A copy of the check or other information confirming payment shall simultaneously be emailed to the following:

Regional Hearing Clerk
R7_Hearing_Clerk_Filings@epa.gov; and

Katherine Kacsur, Attorney
kacsur.katherine@epa.gov.

68. Respondent understands that its failure to timely pay any portion of the civil penalty may result in the commencement of a civil action in Federal District Court to recover the full remaining balance, along with penalties and accumulated interest. In such case, interest shall begin to accrue on a civil or stipulated penalty from the date of delinquency until such civil or stipulated penalty and any accrued interest are paid in full. 31 C.F.R. § 901.9. Interest will be assessed at a rate of the United States Treasury Tax and loan rates in accordance with 31 U.S.C. § 3717. Additionally, a charge will be assessed to cover the costs of debt collection including processing and handling costs, and 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. 31 U.S.C. § 3717(e)(2).

Effect of Settlement and Reservation of Rights

69. Full payment of the penalty proposed in this Consent Agreement shall only resolve Respondent's liability for federal civil penalties for the violations alleged herein. Complainant reserves the right to take any enforcement action with respect to any other violations of RCRA or any other applicable law.

70. The effect of settlement described in the immediately preceding paragraph is conditioned upon the accuracy of Respondent's representations to the EPA, as memorialized in paragraph directly below.

71. Respondent certifies by the signing of this Consent Agreement and Final Order that to the best of its knowledge, it is presently in compliance with all requirements of RCRA, 42 U.S.C. § 6901 *et. seq.*, its implementing regulations, and any permit issued pursuant to RCRA.

72. Full payment of the penalty proposed in this Consent Agreement 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 law. This Consent Agreement and Final Order does not waive, extinguish or otherwise affect Respondent's obligation to comply with all applicable provisions of RCRA and regulations promulgated thereunder.

73. Notwithstanding any other provision of this Consent Agreement and Final Order, EPA reserves the right to enforce the terms and conditions 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 sixty five thousand, six hundred and sixty-six dollars (\$65,666) per day, per violation, pursuant to Section 3008(c) of RCRA, for each day of non-compliance with the terms of this Consent Agreement and Final Order, or to seek any other remedy allowed by law.

74. 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.

75. 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 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.

76. 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.

General Provisions

77. By signing this Consent Agreement, the undersigned representative of Respondent certifies that he or she is fully authorized to execute and enter into the terms and conditions of this Consent Agreement and has the legal capacity to bind the party he or she represents to this Consent Agreement.

78. This Consent Agreement shall not dispose of the proceeding without a final order from the Regional Judicial Officer or Regional Administrator ratifying the terms of this Consent Agreement. This Consent Agreement and Final Order shall be effective upon the 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.

79. The penalty specified herein shall represent civil penalties assessed by EPA and shall not be deductible for purposes of Federal, State and local taxes.

80. 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.

81. 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.

82. 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.

COMPLAINANT:

U.S. ENVIRONMENTAL PROTECTION AGENCY

Candace Bednar
Chemical Branch Chief
Enforcement and Compliance Assurance Division


Date

Katherine Kacsur
Office of Regional Counsel

Date

RESPONDENT:

HERITAGE ENVIRONMENTAL SERVICES


Signature

4/18/2023
Date

Chris Patchon
Printed Name

VP Operations
Title

FINAL ORDER

Pursuant to Sections 3008(a) of RCRA, 42 U.S.C. § 6928(a), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, 40 C.F.R. Part 22, the foregoing Consent Agreement resolving this matter is hereby ratified and incorporated by reference into this Final Order.

Respondent is ORDERED to comply with all of the terms of the Consent Agreement. In accordance with 40 C.F.R. § 22.31(b), the effective date of the foregoing Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

IT IS SO ORDERED.

Karina Borromeo
Regional Judicial Officer

Date

CERTIFICATE OF SERVICE

(For EPA use only.)

I certify that that a true and correct copy of the foregoing Consent Agreement and Final Order in the matter of Heritage Environmental Services, LLC, EPA Docket No. RCRA-07-2023-0034, was sent this day in the following manner to the addressees:

Copy via Email to Complainant:

Katherine Kacsur
Office of Regional Counsel
kacsur.katherine@epa.gov

Ed Buckner
Enforcement and Compliance Assurance Division
buckner.edwin@epa.gov

Copy via Email to Respondent:

Ali Alavi
Executive Vice President – Regulatory Affairs & General Counsel
Heritage Environmental Services, LLC
6510 Telecom Dr., Ste. 400
Indianapolis, IN 46278
aalavi@heritage-enviro.com

Copy via Email to the State of Missouri:

Chris Nagel, Director (e-copy)
Waste Management Program
Missouri Department of Natural Resources
Christopher.Nagel@dnr.mo.gov

Michael Parris, Compliance/Enforcement Chief (e-copy)
Waste Management Program
Missouri Department of Natural Resources
Michael.Parris@dnr.mo.gov

Brandon Backus, (e-copy)
Environmental Program Supervisor, Compliance and Enforcement Section
Waste Management Program
Missouri Department of Natural Resources
Brandon.Backus@dnr.mo.gov

Dated this _____ day of _____, _____.

Signed