

FILED
March 13, 2025
3:00 P.M.
U.S. EPA REGION IX
HEARING CLERK

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Docket No.
RCRA-09-2025-0002

1. The U.S. Environmental Protection Agency (“EPA”) is authorized to enter into this Expedited Settlement Agreement (“Agreement”) pursuant to Section 3008 of the Resource Conservation and Recovery Act (“RCRA”) and 40 C.F.R. § 22.13(b).
2. By copy of this letter, EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA as required by Section 3008(a)(2).
3. Sturm, Ruger & Company, Inc. (“Respondent”) is the owner or operator of the facility located at 200 Ruger Rd., Prescott, AZ 86301. EPA alleges that the Respondent violated the following requirements of the RCRA and EPA approved and authorized Arizona hazardous waste management programs.
 - a. Failure to update the contingency plan and submit a quick reference guide to local emergency response teams: Respondent failed to properly update the contingency plan and submit a quick reference guide to local emergency response teams, in violation of Arizona Administrative Code (“AAC”) §R18-8-262 [40 Code of Federal Regulations (“CFR”) § 262.262(b)].
 - b. Failure to comply with requirements for a tank accumulating hazardous waste: Respondent failed to comply with requirements for a tank accumulating hazardous waste, in violation of AAC § R18-8-262 [40 CFR §262.17(a)(2)].
 - c. Failure to keep a hazardous waste satellite accumulation container closed: Respondent failed to keep a hazardous waste container closed in the satellite accumulation area, in violation of AAC § R18-8-262 [40 CFR §262.15(a)(5)].
 - d. Failure to adequately complete weekly inspections of the central accumulation area: Respondent failed to comply with the weekly inspection requirements in the central accumulation area, in violation of AAC § R18-8-262 [40 CFR § 262.17(a)(1)(v)].

4. EPA and Respondent agree that settlement of this matter for civil penalties of five thousand Dollars (\$5,000) is in the public interest.
5. In signing this Agreement, Respondent: (1) admits that Respondent is subject to RCRA and its implementing regulations; (2) admits that EPA has jurisdiction over Respondent and Respondent's conduct as alleged herein, (3) neither admits nor denies the factual allegations contained herein; (4) consents to the assessment of this penalty; (5) waives the opportunity for a hearing to contest any issues of fact or law set forth herein; (6) waives its right to appeal the Final Order accompanying this Agreement pursuant to Section 3008(b) of RCRA; and (7) consents to electronic service of the files ESA. By signing this consent agreement, Respondent waives any rights or defenses that Respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the final order accompanying the consent agreement.
6. By its signature below Respondent certifies, subject to civil and criminal penalties for making a false submission to the United States Government, that: the alleged violations have been corrected; Respondent has submitted true and accurate documentation of such correction; and, Respondent has submitted proof of payment of the civil penalty.
7. The undersigned representative of Respondent certifies that he or she is fully authorized to enter into the terms and conditions of this Expedited Settlement Agreement and Final Order and to execute and legally bind Respondent to it.
8. EPA reserves all its rights to take an enforcement action for any other past, present, or future violations by Respondent of RCRA, any other federal statute or regulation, or this Agreement.
9. Each party shall bear its own costs and fees, if any.
10. This Agreement is binding on the parties signing below, and in accordance with 40 C.F.R. § 22.31(b), is effective upon filing.
11. No portion of the civil penalty or interest paid by Respondent pursuant to the requirements of this CAFO shall be claimed by Respondent as a deduction for federal, states or local income tax purposes.
12. Entry of the Final Order shall constitute full settlement of the civil claims alleged herein.

In the matter of Sturm, Ruger & Company, Inc.

Docket No. RCRA-09-2025-0002

IT IS SO AGREED,

William L. Bailey

Name (print):

Sr Director of EHS Operations

Title (print):

William L. Bailey

Digitally signed by William L.

Bailey

Date: 2025.03.05 06:28:56 -06'00'

Date: 3/5/2025

Signature

APPROVED BY EPA:

JOEL JONES

Digitally signed by JOEL JONES

Date: 2025.03.07 12:34:02 -08'00'

Date: _____

Joel Jones, Acting Division Director

Enforcement and Compliance Assurance Division

U.S. EPA Region 9

FINAL ORDER

It is hereby ordered that this Expedited Settlement Agreement and Final Order be entered:

Date: _____

Beatrice Wong

Regional Judicial Officer

U.S. EPA Region IX

CERTIFICATE OF SERVICE

I hereby certify the attached Expedited Settlement Agreement and Final Order in the matter of Sturm, Ruger & Company, Inc. (Docket No. RCRA-09-2025-0002) has been filed by the Regional Hearing Clerk, and was served on the parties, via electronic mail, as indicated below:

RESPONDENT:

Williams L. Bailey
Senior Director of EHS Operations
Sturm, Ruger & Company, Inc.
200 Ruger Road
Prescott, AZ 86301
BBailey@ruger.com

COMPLAINANT:

Andrew Helmlinger
Assistant Regional Counsel
U.S. EPA – Region IX
Hazardous Waste Section I (ORC-3-1)
75 Hawthorne Street
San Francisco, CA 94105
Helmlinger.Andrew@epa.gov

Ponly Tu
Regional Hearing Clerk
U.S. EPA – Region IX