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**U.S. EPA REGION 1
HEARING CLERK**

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

IN THE MATTER OF:

Hampford Research, Inc.
54 Veterans Blvd., Stratford CT 06615
EPA ID. No. CTD075133835

Proceeding under Section 3008(a) of the Resource
Conservation and Recovery Act, 42 U.S.C § 6928(a))

) Docket No.
) RCRA-01-2025-0028
)

) **EXPEDITED SETTLEMENT**
) **AGREEMENT**
)

EXPEDITED SETTLEMENT AGREEMENT

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. EPA has provided the State of Connecticut with notice of the referenced violations of Subtitle C of RCRA, as required by Section 3008(a)(2).
3. Hampford Research, Inc. ("Respondent" or "Hampford") is the owner and/or operator of a facility located at 54 Veterans Blvd., Stratford, CT ("Facility"). EPA inspected the Facility on July 25-27, 2022, and transmitted to Respondent a Request for Information on March 4, 2024. Based on the EPA inspection and Hampford's response to EPA's information request, EPA alleges that Respondent violated the following requirements of RCRA and the EPA-authorized Connecticut hazardous waste management regulations.
 - a. Section 22a-449(c)-102(a)(1) of the Regulations of Connecticut State Agencies ("RCSA"), which incorporates by reference 40 C.F.R. 262.11, requires that a facility make an accurate hazardous waste determination to ensure proper management according to applicable hazardous waste regulations. In its response to EPA's Request for Information, Hampford Research, Inc. self-disclosed that a waste shipment on December 8, 2022, originally sent off-site as non-hazardous waste, was later discovered to be characteristically hazardous for corrosivity (D002) by the destination facility. Prior to shipment off-site, this waste was stored and managed in Tank 6.
 - b. Section 22a-449(c)-102(a)(1) of the RCSA, which incorporates by reference 40 C.F.R. 262.20, requires that a facility ship all hazardous waste for off-site treatment, storage, or disposal along with a Hazardous Waste Manifest. In its response to EPA's Request for Information Question #7, Hampford Research, Inc. self-disclosed that on December 8, 2022, it sent a shipment of 2,700 gallons of "Non-DOT/Non-RCRA Regulated Material" to Tradebe Environmental Services in Bridgeport, CT ("Tradebe") that was tested and

found to be hazardous (D002). Tradebe rejected the load due to its high pH and correctly manifested the load on a hazardous waste manifest.

- c. Section 22a-449(c)-102(a)(1) of the RCSA, which incorporates by reference 40 C.F.R. 262.34(c), requires that initial accumulation of hazardous waste in a satellite accumulation container shall occur at or near the point of waste generation where the waste initially accumulates, which is under the control of the operator of the process generating the waste. In its response to EPA's Request for Information Question #8, Hampford provided EPA with its Waste Management Plan. Pursuant to the plan, there are two types of waste containers used in Hampford's laboratories: collection containers and satellite waste containers. Based on the information in the waste management plan and observations made by EPA representatives during EPA's 2022 inspection, Respondent transferred laboratory-generated hazardous waste from small collection containers into satellite accumulation containers in other areas and rooms at the Facility.
 - d. Section 22a-449(c)-102(a)(1) of the RCSA, which incorporates by reference 40 C.F.R. 262.34(a)(4), requires that a facility conduct annual personnel training and maintain documentation of hazardous waste personnel training. In its response to EPA's Request for Information, Question #10, Hampford self-disclosed that it did not conduct required annual hazardous waste training for any of its staff in 2021.
4. EPA and Respondent agree that settlement of this matter for a civil penalty of six thousand dollars (\$6,000) 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 issue 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 filed Agreement.
 6. By signing this 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 this Agreement.
 7. 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 and Respondent has submitted true and accurate documentation of such correction.
 8. The undersigned representative of Respondent certifies that he or she is fully authorized to enter the terms and conditions of this Expedited Settlement Agreement and Final Order and to execute and legally bind Respondent to it. Payment of the civil penalty shall constitute full settlement of the civil claims alleged herein.

9. EPA reserves all of 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.
10. Each party shall bear its own costs and fees, if any.
11. This Agreement is binding on the parties signing below, and in accordance with 40 C.F.R. § 22.31(b), is effective upon filing.
12. Within thirty (30) calendar days of the effective date of this Agreement, Respondent must pay the civil penalty of \$6,000 using any method provided on the following website: <https://www.epa.gov/financial/makepayment>. Such payment shall identify Respondent by name and include the docket number assigned to this Agreement.
13. Within 24 hours of payment, Respondent shall email proof of payment (e.g., a copy of the check or a statement of affirmation regarding electronic funds transfer), including Respondent's name, complete address, and docket number to the following:

Wanda Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
r1_hearing_clerk_filings@epa.gov

Kimberly Chavez, RCRA Inspector
U.S. Environmental Protection Agency, Headquarters
Chavez.kimberly@epa.gov

U.S. Environmental Protection Agency
Cincinnati Finance Center
CINWD_AcctsReceivable@epa.gov
14. No portion of the civil penalty or interest paid by Respondent pursuant to the requirements of this Expedited Settlement Agreement and Final Order shall be claimed by Respondent as a deduction for federal, state or local income tax purposes.
15. Complainant and Respondent, by entering into this Agreement, each give their respective consent to accept digital signatures hereupon. Respondent further consents to accept electronic service of the fully executed Agreement, by electronic mail, to the following address: llirio@hampfordresearch.com. Respondent understands that this e-mail address may be made public when the Agreement and Certificate of Service are filed and uploaded to a searchable database. Complainant has provided Respondent with a copy of the EPA Region 1 Regional Judicial Officer's Authorization of EPA Region 1 Part 22 Electronic Filing System for Electronic Filing and Service of Documents Standing Order, dated June 19, 2020. Electronic signatures shall comply with, and be maintained in accordance with, that Order.

IT IS SO AGREED,

For Respondent:



Lloyd Lirio
President
Hampford Research, Inc.

Date:

02/19/2025

For the U.S. EPA, Region 1:

Date:

James Chow, Director
Enforcement and Compliance Assurance Division
EPA, Region 1

FINAL ORDER

Pursuant to 40 C.F.R. § 22.18(b) and (c) of the Consolidated Rules of Practice found at 40 C.F.R. Part 22, the Expedited Settlement Agreement resolving this matter is incorporated by reference into this Final Order and is hereby ratified. The Respondent, Hampford Research, Inc., is ORDERED to comply with all terms of the Expedited Settlement Agreement, which shall become effective on the date it is filed with the EPA Region 1 Regional Hearing Clerk.

IT IS SO ORDERED:

Date:

LeAnn Jensen
Regional Judicial Officer
EPA, Region 1