

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

FILED

Sep 29, 2025

9:14 am

**U.S. EPA REGION 3
HEARING CLERK**

In the Matter of: :
:
Dias Concrete Company : U.S. EPA Docket No. RCRA-03-2025-0163
8516 Bucyrus Court :
Manassas, VA 22110 : Proceeding under Section 9006 of the Resource
 : Conservation and Recovery Act, 42 U.S.C.
Respondent. : Section 6991e
:

CONSENT AGREEMENT

PRELIMINARY STATEMENT

1. This Consent Agreement is entered into by the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3 ("Complainant") and Dias Concrete Company ("Respondent") (collectively the "Parties"), pursuant to Section 9006 of the Resource Conservation and Recovery Act ("RCRA" or the "Act"), 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 of Practice"), 40 C.F.R. Part 22. Section 9006 of RCRA, 42 U.S.C. § 6991e, authorizes the Administrator of the U.S. Environmental Protection Agency to assess penalties and undertake other actions required by this Consent Agreement. The Administrator has delegated this authority to the Regional Administrator who, in turn, has delegated the authority to enter into agreements concerning administrative penalties to the Complainant. This Consent Agreement and the attached Final Order (hereinafter jointly referred to as the "Consent Agreement and Final Order") resolve Complainant's civil penalty claims against Respondent under RCRA Subtitle I, 42 U.S.C. §§ 6991-6991m, for the violations alleged herein.
2. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant hereby simultaneously commences and resolves this administrative proceeding.

JURISDICTION

3. The U.S. Environmental Protection Agency ("EPA") has jurisdiction over the above-captioned matter, as described in Paragraph 1, above.
4. The Consolidated Rules of Practice govern this administrative adjudicatory proceeding pursuant to 40 C.F.R. § 22.1(a)(4).

5. The EPA has given the Virginia Department of Environmental Quality (“VADEQ”) notice of the issuance of this Consent Agreement and Final Order in accordance with Section 9006(a)(2) of RCRA, 42 U.S.C. § 6991e(a)(2).

GENERAL PROVISIONS

6. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this Consent Agreement and Final Order.
7. Except as provided in Paragraph 6, above, Respondent neither admits nor denies the specific factual allegations set forth in this Consent Agreement.
8. Respondent agrees not to contest the jurisdiction of the EPA with respect to the execution of this Consent Agreement, the issuance of the attached Final Order, or the enforcement of this Consent Agreement and Final Order.
9. For purposes of this proceeding only, Respondent hereby expressly waives its right to contest the allegations set forth in this Consent Agreement and Final Order and waives its right to appeal the accompanying Final Order.
10. Respondent consents to the assessment of the civil penalty stated herein, to the issuance of any specified compliance order herein, and to any conditions specified herein.
11. Respondent shall bear its own costs and attorney’s fees in connection with this proceeding.
12. 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.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

13. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant alleges and adopts the Findings of Fact and Conclusions of Law set forth immediately below.
14. The Commonwealth of Virginia is approved to administer and enforce an underground storage tank program in lieu of the Federal program under Subtitle I of the Act, 42 U.S.C. §§ 6991-6991m. The program, as administered by VADEQ, was approved by the EPA, pursuant to 42 U.S.C. 6991c and 40 CFR part 281. The EPA approved the Virginia underground storage tank (“UST”) program, set forth in the Virginia Administrative Code

- (“Va. Admin. Code”), Title 9, Agency 25, Chapter 580 “Underground Storage Tanks,” on September 28, 1998, and approval of the Virginia UST program became effective on October 28, 1998. A subsequent UST program revision application was approved by the EPA on March 2, 2021, and it became effective on May 3, 2021.
15. The federally approved Virginia UST program is enforceable by the EPA pursuant to Section 9006(a) of RCRA, 42 U.S.C. § 6991e(a).
 16. Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d), authorizes the assessment of civil penalties against any owner or operator of an UST who fails to comply with, inter alia, any requirement or standard of a state program that has been approved pursuant to Section 9004 of RCRA, 42 U.S.C. § 6991c, for the violations alleged herein.
 17. The Virginia UST program regulates USTs used that contain “regulated substances,” as that term is defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 9 Va. Admin. Code § 25-580-10.
 18. At all times relevant to this Consent Agreement, Respondent is, and has been, a “person,” as defined by Section 9001(5) of RCRA, 42 U.S.C. § 6991(5), and 9 Va. Admin. Code § 25-580-10.
 19. At all times relevant to this Consent Agreement, Respondent is, and has been, the “operator” and/or “owner” of an “UST,” as those terms are defined by Sections 9001(3), (4), and (10) of RCRA, 42 U.S.C. § 6991(3), (4), and (10), and 9 Va. Admin. Code § 25-580-10, respectively, at Respondent’s facility located at 8516 Bucyrus Court, Manassas, Virginia 22110 (the “Facility”).
 20. At all times relevant to this Consent Agreement, there is, and there has been one 12,000-gallon UST for diesel at the Facility. The UST was installed on or about April 1997. The UST is constructed of double-walled composite material and utilizes pressurized piping. The piping is constructed of fiberglass-reinforced plastic. The Facility uses a Veeder-Root TLS 350 Automatic Tank Gauge (“ATG”) system for tank release detection. The ATG system conducts two-hour downtime 0.2 gallon/hour tank release detection tests.
 21. On March 30, 2023, pursuant to Section 9005(a) of RCRA, 42 U.S.C. § 6991d(a), the EPA conducted an inspection of the Facility (the “Inspection”) to determine Respondent’s compliance with RCRA Subtitle I and the Va. Admin. Code.
 22. Based on the EPA’s findings during the Inspection and other information Respondent provided to the EPA, the EPA concludes that Respondent violated certain requirements and provisions of RCRA Subtitle I and certain federally authorized Va. Admin. Code requirements promulgated thereunder, as enumerated below.

Count 1

Failure to Annually Test Operation of the Line Leak Detector

23. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
24. Pursuant to 9 Va. Admin. Code § 25-580-170.1, automatic line leak detectors for piping used to meet the requirements of 9 Va. Admin. Code § 25-580-140 must be conducted in accordance with “[m]ethods that alert the operator of the presence of a leak by restricting or shutting off the flow of regulated substances through piping or triggering an audible or visual alarm...only if they detect leaks of three gallons per hour at 10 pounds per square inch line pressure within one hour. An annual test of operation of the leak detector must be conducted in accordance with subdivision A.3.c of 9 Va. Admin. Code § 25-580-130.”
25. According to documentation observed by an EPA inspector during the Inspection, Respondent passed line leak detector testing on February 11, 2021. The next annual testing of the line leak detector was therefore due by February 11, 2022; however, Respondent did not conduct line leak detector testing until March 24, 2023.
26. From February 11, 2022 through March 23, 2023, Respondent failed to annually test operation of the line leak detector.
27. From February 11, 2022 through March 23, 2023, Respondent violated 9 Va. Admin. Code § 25-580-170.1 and RCRA Subtitle I by failing to annually test operation of the line leak detector.
28. In failing to comply with 9 Va. Admin. Code § 25-580-170.1 and RCRA Subtitle I, Respondent is subject to the assessment of penalties under 9006(d)(2) of RCRA, 42 U.S.C. § 6991e(d)(2).

Count 2

Failure to Conduct Annual Line Tightness Test or Monthly Monitoring of Pressurized Piping

29. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
30. Pursuant to 9 Va. Admin. Code § 25-580-140, “[o]wners and operators of petroleum UST systems must provide release detection for tanks and piping.” Pursuant to 9 Va. Admin. Code § 25-580-140.2, pressurized piping installed before September 15, 2010 must be equipped with an automatic line leak detector and must have an annual line tightness test conducted in accordance with subdivision 2 of 9 Va. Admin. Code § 25-580-170 or

must have monthly monitoring conducted in accordance with subdivision 3 of 9 Va. Admin. Code § 25-580-170.

31. According to documentation observed by an EPA inspector during the Inspection, Respondent conducted a line tightness test on February 11, 2021. The next annual testing of the line tightness was therefore due by February 11, 2022; however, Respondent did not conduct line tightness testing until March 24, 2023.
32. From February 11, 2022 through March 23, 2023, Respondent failed to conduct either annual line tightness testing or monthly monitoring for pressurized piping in accordance with 9 Va. Admin. Code § 25-580-170.
33. From February 11, 2022 through March 23, 2023, Respondent violated 9 Va. Admin. Code § 25-580-140.2 and RCRA Subtitle I by failing to conduct either annual line tightness testing or monthly monitoring for pressurized piping in accordance with 9 Va. Admin. Code § 25-580-170.
34. In failing to comply with 9 Va. Admin. Code § 25-580-140.2 and RCRA Subtitle I, Respondent is subject to the assessment of penalties under 9006(d)(2) of RCRA, 42 U.S.C. § 6991e(d)(2).

Count 3

Failure to Conduct Walkthrough Inspections

35. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
36. Pursuant to 9 Va. Admin. Code § 25-580-85.A, “[t]o properly operate and maintain UST systems, not later than January 1, 2021, owners and operators must meet one of the following:” (1) conduct a walkthrough inspection that, at a minimum, checks spill prevention equipment and release detection equipment every 30 days and containment sumps and handheld release detection equipment annually with requirements specified in the subdivision; (2) conduct operation and maintenance walkthrough inspections according to a standard code of practice developed by a nationally recognized association or independent testing laboratory that checks equipment comparable to 9 Va. Admin. Code § 25-580-85.A(1); or (3) conduct operation and maintenance walkthrough inspections according to a protocol developed by Virginia’s State Water Control Board that checks equipment comparable to 9 Va. Admin. Code § 25-580-85.A(1).
37. From July 2, 2022 through July 4, 2022; September 4, 2022 through September 7, 2022; December 3, 2022 through December 6, 2022; and February 4, 2023 through February

- 6, 2023, Respondent failed to conduct 30-day walkthrough inspections following the methods specified in 9 Va. Admin. Code § 25-580-85.A.
38. From July 2, 2022 through July 4, 2022; September 4, 2022 through September 7, 2022; December 3, 2022 through December 6, 2022; and February 4, 2023 through February 6, 2023, Respondent violated 9 Va. Admin. Code § 25-580-85.A and RCRA Subtitle I by failing to conduct 30-day walkthrough inspections following the methods specified in 9 Va. Admin. Code § 25-580-85.A.
39. In failing to comply with 9 Va. Admin. Code § 25-580-85.A and RCRA Subtitle I, Respondent is subject to the assessment of penalties under 9006(d)(2) of RCRA, 42 U.S.C. § 6991e(d)(2).

CIVIL PENALTY

40. In settlement of the EPA's claims for civil penalties for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty in the amount of TWENTY-NINE THOUSAND EIGHT HUNDRED SIX dollars (\$29,806.00), which Respondent shall be liable to pay in accordance with the terms set forth below.
41. In determining the amount of the civil penalty to be assessed, the EPA has taken into account the factors specified in Section 9006(c) of the RCRA, 42 U.S.C. § 6991e(c). After considering these factors, the EPA has determined that an appropriate penalty to settle this action is \$29,806.00.
42. Respondent agrees to pay a civil penalty in the amount of \$29,806.00 ("Assessed Penalty") within thirty (30) days of the Effective Date of this Consent Agreement and Final Order.
43. Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>. Any checks should be made payable to "Treasurer, United States of America." However, for any payments made after September 30, 2025, and in accordance with the March 25, 2025 Executive Order on [Modernizing Payments To and From America's Bank Account](#), Respondent shall pay using one of the electronic payments methods listed on the [EPA's How to Make a Payment website](#) and will not pay with a paper check.
44. When making a payment, Respondent shall:
- a. Identify every payment with Respondent's name and the docket number of this Consent Agreement, RCRA-03-2025-0163,

- b. Concurrently with any payment or within 24 hours of any payment, Respondent shall serve Proof of Payment simultaneously **by email** to the following person(s):

Promy Tabassum
Assistant Regional Counsel
tabassum.promy@epa.gov

U.S. Environmental Protection Agency
Cincinnati Finance Center
CINWD_AcctsReceivable@epa.gov,

and

U.S. EPA Region 3 Regional Hearing Clerk
R3_Hearing_Clerk@epa.gov.

“Proof of Payment” means, as applicable, a copy of the check, confirmation of credit card or debit card payment, or confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to the EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent’s name.

45. Interest, Charges, and Penalties on Late Payments. Pursuant to 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay the full amount of the Assessed Penalty per this Consent Agreement, the EPA is authorized to recover, in addition to the amount of the unpaid Assessed Penalty, the following amounts.
- a. Interest. Interest begins to accrue from the Effective Date of this Consent Agreement. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. To protect the interests of the United States, the rate of interest is set at the IRS standard underpayment rate, any lower rate would fail to provide Respondent adequate incentive for timely payment.
- b. Handling Charges. Respondent will be assessed monthly a charge to cover the EPA’s costs of processing and handling overdue debts. If Respondent fails to pay the Assessed Penalty in accordance with this Consent Agreement, the EPA will assess a charge to cover the costs of handling any unpaid amounts for the first thirty (30) day period after the Effective Date. Additional handling charges will be assessed every thirty (30) days, or any portion thereof, until the unpaid portion

of the Assessed Penalty as well as any accrued interest, penalties, and other charges are paid in full.

- c. Late Payment Penalty. A late payment penalty of six percent (6%) per annum, will be assessed monthly on all debts, including any unpaid portion of the Assessed Penalty, interest, penalties, and other charges, that remain delinquent more than ninety (90) days. Any such amounts will accrue from the Effective Date.
46. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Consent Agreement, the EPA may take additional actions. Such actions the EPA may take include, but are not limited to, the following.
- a. Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R. §§ 13.13 and 13.14.
 - b. Collect the debt by administrative offset (i.e., the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, per 40 C.F.R. Part 13, Subparts C and H.
 - c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs EPA sponsors or funds, per 40 C.F.R. § 13.17.
 - d. Refer this matter to the United States Department of Justice for litigation and collection, per 40 C.F.R. § 13.33.
47. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.
48. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Consent Agreement shall not be deductible for purposes of federal taxes.
49. Payment of the civil penalty is due and payable immediately upon receipt by Respondent of a true and correct copy of the fully executed and filed Consent Agreement and Final Order. Receipt by Respondent or Respondent's legal counsel of such copy of the fully executed Consent Agreement and Final Order, with a date stamp indicating the date on which the Consent Agreement and Final Order was filed with the

Regional Hearing Clerk, shall constitute receipt of written initial notice that a debt is owed the EPA by Respondent in accordance with 40 C.F.R. § 13.9(a).

50. The Parties consent to service of the Final Order by e-mail at the following valid email addresses: tabassum.promy@epa.gov (for Complainant), and gobrien@manassaslawyers.com (for Respondent).

GENERAL SETTLEMENT CONDITIONS

51. By signing this Consent Agreement, Respondent acknowledges that this Consent Agreement and Final Order will be available to the public and represents that, to the best of Respondent's knowledge and belief, this Consent Agreement and Final Order does not contain any confidential business information or personally identifiable information from Respondent.
52. Respondent certifies that any information or representation it has supplied or made to the EPA concerning this matter was, at the time of submission true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. The EPA shall have the right to institute further actions to recover appropriate relief if the EPA obtains evidence that any information provided and/or representations made by Respondent to the EPA regarding matters relevant to this Consent Agreement and Final Order, including information about respondent's ability to pay a penalty, are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that the EPA may have, civil or criminal, under law or equity in such event. Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

CERTIFICATION OF COMPLIANCE

53. Respondent certifies to the EPA, upon personal investigation and to the best of its knowledge and belief, that it currently is in compliance with regard to the violations alleged in this Consent Agreement.

OTHER APPLICABLE LAWS

54. Nothing in this Consent Agreement and Final Order shall relieve Respondent of its obligation to comply with all applicable federal, state, and local laws and regulations, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on the validity of any federal, state, or local permit. This Consent Agreement and Final Order does not constitute a waiver,

suspension, or modification of the requirements of the RCRA Subtitle I, or any regulations promulgated thereunder.

RESERVATION OF RIGHTS

55. This Consent Agreement and Final Order resolves only the EPA's claims for civil penalties for the specific violations alleged against Respondent in this Consent Agreement and Final Order. The EPA reserves the right to commence action against any person, including Respondent, in response to any condition which the EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. This settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice, 40 C.F.R. § 22.18(c). The EPA reserves any rights and remedies available to it under RCRA Subtitle I, the regulations promulgated thereunder and any other federal law or regulation to enforce the terms of this Consent Agreement and Final Order after its effective date. Respondent reserves whatever rights or defenses it may have to defend itself in any such action.

EXECUTION /PARTIES BOUND

56. This Consent Agreement and Final Order shall apply to and be binding upon the EPA, the Respondent and the officers, directors, employees, contractors, successors, agents and assigns of Respondent. By his or her signature below, the person who signs this Consent Agreement on behalf of Respondent is acknowledging that he or she is fully authorized by the Respondent to execute this Consent Agreement and to legally bind Respondent to the terms and conditions of this Consent Agreement and Final Order.

EFFECTIVE DATE

57. The effective date of this Consent Agreement and Final Order ("Effective Date") is the date on which the Final Order, signed by the Regional Administrator of the EPA, Region 3, or the Regional Administrator's designee, the Regional Judicial Officer, is filed along with the Consent Agreement with the Regional Hearing Clerk pursuant to the Consolidated Rules of Practice.

ENTIRE AGREEMENT

58. This Consent Agreement and Final Order constitutes the entire agreement and understanding between the Parties regarding settlement of all claims for civil penalties pertaining to the specific violations alleged herein and there are no representations, warranties, covenants, terms, or conditions agreed upon between the Parties other than those expressed in this Consent Agreement and Final Order.

In the Matter of: Dias Concrete Company

EPA Docket No. RCRA-03-2025-0163

For Respondent: DIAS CONCRETE COMPANY

Date: 8-16-2025

By

Jose Dias, President
Dias Concrete Company

For the Complainant:

After reviewing the Consent Agreement and other pertinent matters, I, the undersigned Director of the Enforcement and Compliance Assurance Division of the United States Environmental Protection Agency, Region 3, agree to the terms and conditions of this Consent Agreement and recommend that the Regional Administrator, or the Regional Administrator's designee, the Regional Judicial Officer, issue the attached Final Order.

By: **ANDREA BAIN** Digitally signed by ANDREA BAIN
Date: 2025.09.24 09:55:18 -04'00'

[Digital Signature and Date]
Acting Director
Enforcement and Compliance Assurance Division
U.S. EPA – Region 3
Complainant

Attorney for Complainant:

By: **PROMY
TABASSUM** Digitally signed by PROMY
TABASSUM
Date: 2025.09.23 10:49:36 -04'00'

[Digital Signature and Date]
Promy Tabassum
Assistant Regional Counsel
U.S. EPA – Region 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

FILED

Sep 29, 2025

9:14 am

U.S. EPA REGION 3
HEARING CLERK

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8516 Bucyrus Court :
Manassas, VA 22110 : Proceeding under Section 9006 of the Resource
: Conservation and Recovery Act, 42 U.S.C.
Respondent. : Section 6991e
:

FINAL ORDER

Complainant, the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3, and Respondent, Dias Concrete Company 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 (with specific reference to Sections 22.13(b) and 22.18(b)(2) and (3)). The terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated into this Final Order as if fully set forth at length herein.

NOW, THEREFORE, PURSUANT TO Section 9006 of Resource Conservation and Recovery Act ("RCRA" or the "Act"), 42 U.S.C. § 6991e, and Section 22.18(b)(3) of the Consolidated Rules of Practice, **IT IS HEREBY ORDERED** that Respondent pay a civil penalty in the amount of **TWENTY-NINE THOUSAND EIGHT HUNDRED SIX DOLLARS (\$29,806.00)**, in accordance with the payment provisions set forth in the Consent Agreement and in 40 C.F.R. § 22.31(c), and comply with the terms and conditions of the Consent Agreement.

This Final Order constitutes the final Agency action in this proceeding. This Final Order 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 the law. This Final Order resolves only those causes of action alleged in the Consent Agreement and does not waive, extinguish, or otherwise affect Respondent's obligation to comply with all applicable provisions of RCRA and the regulations promulgated thereunder.

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.

By: JEFFREY
NAST

Digitally signed by JEFFREY
NAST
Date: 2025.09.26 14:42:42
-04'00'

[Digital Signature and Date]
Regional Judicial and Presiding Officer
U.S. EPA – Region 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

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Manassas, VA 22110	: Proceeding under Section 9006 of the Resource
	: Conservation and Recovery Act, 42 U.S.C.
Respondent.	: Section 6991e
	:

CERTIFICATE OF SERVICE

I certify that the foregoing ***Consent Agreement and Final Order*** was filed with the EPA Region 3 Regional Hearing Clerk on the date that has been electronically stamped on the ***Consent Agreement and Final Order***. I further certify that on the date set forth below, I caused to be served a true and correct copy of the foregoing to each of the following persons, in the manner specified below, at the following addresses:

Copies served via email to:

Jose Dias, President
Dias Concrete Company
8516 Bucyrus Court
Manassas, VA 22110
Diasconcrete@yahoo.com

Geoffrey J. O'Brien, Esq.
Purnell, McKennett and Menke, P.C.
9214 Center Street, Suite 101
Manassas, VA 20110
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Promy Tabassum, Esq.
Assistant Regional Counsel
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tabassum.promy@epa.gov

Caitlin Stormont
Enforcement and Compliance Officer
U.S. EPA, Region 3
stormont.caitlin@epa.gov

By:	BEVIN		Digitally signed by BEVIN
	ESPOSITO		ESPOSITO
			Date: 2025.09.29 09:16:03
			-04'00'
	[Digital Signature and Date]		
	Regional Hearing Clerk		
	U.S. EPA – Region 3		