

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	Docket No. RCRA-05-2023-0001
)	
Univar Solutions USA, Inc.)	Consent Agreement and Final Order
Dublin, Ohio)	Under Section 3008(a) of the Resource
)	Conservation and Recovery Act,
U.S. EPA ID No.: OHR000162800)	42 U.S.C. § 6928(a)
)	
Respondent.)	
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Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 3008(a) of the Solid Waste Disposal Act, as amended, also known as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), and Sections 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules) as codified at 40 C.F.R. Part 22.

2. The Complainant is the Director of the Enforcement and Compliance Assurance Division, United States Environmental Protection Agency (U.S. EPA), Region 5.

3. Respondent is Univar Solutions USA, Inc. (Univar Solutions), a corporation doing business in the State of Ohio.

4. U.S. EPA provided notice of this action to the State of Ohio pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

5. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the

issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

6. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

7. Respondent consents to the assessment of the civil penalty specified in this CAFO, and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

8. Jurisdiction for this action is conferred upon U.S. EPA by Sections 3006 and 3008 of RCRA, 42 U.S.C. §§ 6926 and 6928.

9. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

10. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO.

Statutory and Regulatory Background

11. U.S. EPA has promulgated regulations, codified at 40 C.F.R. Parts 260 through 279, governing generators and transporters of hazardous waste and facilities that treat, store, and dispose of hazardous waste, pursuant to Sections 3001 – 3007, and 3013, among others, of RCRA, 42 U.S.C. §§ 6921 – 6927, and 6934.

12. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of U.S. EPA may authorize a state to administer the RCRA hazardous waste program in lieu of the federal program when the Administrator finds that the state program meets certain conditions.

13. Any violation of regulations promulgated pursuant to Subtitle C (Sections 3001–3023 of RCRA, 42 U.S.C. §§ 6921-6939e) or any state provision authorized pursuant to Section 3006 of RCRA constitutes a violation of RCRA, subject to the assessment of civil penalties and

issuance of compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

14. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Administrator of U.S. EPA granted the State of Ohio final authorization to administer a state hazardous waste program in lieu of the federal government's base RCRA program effective June 30, 1989. 54 Fed. Reg. 27,170 (June 28, 1989). U.S. EPA subsequently approved amendments to the Ohio hazardous waste program effective June 7, 1991, (56 Fed. Reg. 14203, April 8, 1991); effective August 19, 1991, (56 Fed. Reg. 28088, June 19, 1991); effective September 25, 1995, (60 Fed. Reg. 38502, July 27, 1995); effective December 23, 1996, (61 Fed. Reg. 54950, October 23, 1996); effective January 24, 2003, (68 Fed. Reg. 3429, January 24, 2003); effective January 20, 2006, (71 Fed. Reg. 3220, January 20, 2006); effective October 29, 2007, (72 Fed. Reg. 61063, October 29, 2007); effective March 19, 2012, (77 Fed. Reg. 15966, March 19, 2012); effective February 12, 2018, (83 Fed. Reg. 5948, February 12, 2018); and effective September 26, 2019, (84 Fed. Reg. 50766, September 26, 2019).

15. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified period, or both. The Administrator of U.S. EPA may assess a civil penalty of up to \$109,024 per day for each violation of Subtitle C of RCRA that occurred after November 2, 2015, and where the penalties are assessed on or after January 12, 2022, pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), and 40 C.F.R. Part 19.

Factual Allegations and Alleged Violations

16. Ohio Admin. Code 3745-50-10(A)(102), [40 C.F.R. § 260.10,¹ and Section 1004(15) of RCRA, 42 U.S.C. § 6903(15)], defines a “person” to include, but not be limited to, an individual, trust, firm, corporation, partnership or association.

17. Respondent was and is a “person” as defined by Ohio Admin. Code 3745-50-10(A)(102), 40 C.F.R. § 260.10, and Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

18. Respondent is an “owner” or “operator,” as those terms are defined under Ohio Admin. Code 3745-50-10(A)(96) and (95) and 40 C.F.R. § 260.10, of a facility located at 5200 Blazer Parkway, DS-1, Dublin, Ohio (Facility).

19. At all times relevant to this CAFO, Respondent’s Facility consisted of land and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste.

20. Respondent’s Facility is a “facility,” as that term is defined under Ohio Admin. Code 3745-50-10(A)(48) and 40 C.F.R. § 260.10.

21. On March 1, 2019, Respondent acquired Nexeo Solutions through a merger agreement and continued operations as Univar Solutions using the same U.S. EPA identification number Nexeo previously operated with.

22. By merging with Nexeo Solutions and continuing operations as Univar Solutions, the surviving entity, Respondent is liable for Nexeo Solution’s violations of RCRA and its implementing regulations.

¹ The citations to the rules contained in the Ohio Administrative Code are the federally enforceable regulations in the State of Ohio. References to the federal regulations are for ease of reference and are to the June 2016 version of the Code of Federal Regulations. U.S. EPA re-codified the generator rules into 40 C.F.R. § 262.17. See, *Hazardous Waste Generator Improvement Rule*, 81 Fed. Reg. 5808, November 28, 2016. The State of Ohio has not yet been authorized for the re-codified rules and therefore, they are not federally enforceable.

23. Respondent's actions and processes at the Facility cause the production of "hazardous waste," as that term is defined under Ohio Admin. Code 3745-50-10(A)(57) and 3745-51-03 and 40 C.F.R. § 261.3.

24. Respondent is a "generator" of hazardous waste, as that term is defined under Ohio Admin. Code 3745-50-10(A)(54) and 40 C.F.R. § 260.10.

25. From at least 2017 through 2020, Respondent generated hazardous waste using Respondent's U.S. EPA identification number (specifically, waste flammable liquids/bulk mixed solvents with waste codes D001, D002, F003, F005) in amounts greater than 1,000 kg per month in some calendar months (qualifying it as a "Large Quantity Generator"), which it shipped off-site to a treatment, storage, or disposal facility within the United States.

26. At least 44 manifests, from July 1, 2018 through February 28, 2020, show that waste flammable liquids/bulk mixed solvents/D001, F003, F005 hazardous waste came from PharmaChem Technologies, G.B., LTD ("PharmaChem"), located at West Sunrise Highway, F-42430, Freeport, Bahamas, and was bound for Geocycle, LLC/Holcim, located at 2175 Gardner Boulevard, Holly Hill, South Carolina (SCD003368891) as the designated treatment, storage, or disposal facility. Thus, Respondent imported and directed the hazardous waste to a treatment, storage, or disposal facility within the United States.

27. On February 18, 2021, U.S. EPA sent to Respondent a Request for Information (RFI) issued under Section 3007 of RCRA, 42 U.S.C. § 6927.

28. On March 19, 2021, Respondent replied to the RFI.

29. On October 27, 2021, U.S. EPA sent to Respondent a Notice of Potential RCRA Violations and Opportunity to Confer (Notice).

30. The Notice identified potential RCRA violations and requested information

documenting any actions taken since Respondent's receipt of U.S. EPA's RFI to address the areas of concern identified in the Notice.

31. Respondent responded to the Notice on December 10, 2021.

32. Thereafter, Respondent engaged with U.S. EPA to assess the matter and has agreed to the entry of this CAFO.

Alleged Violations

Count I: Notification of Change of Hazardous Waste Activity and Biennial Reporting

33. Complainant incorporates paragraphs 1 through 32 of this CAFO as though set forth in this paragraph.

34. Pursuant to Ohio Admin. Code 3745-51-05(C) and (D), a generator must determine the quantity of hazardous waste generated per month, so as to allow the generator to determine the applicability of the provisions of Ohio Admin. Code 3745-52 that are dependent on quantity generated per month.

35. Pursuant to Section 3010(a) of RCRA, 42 U.S.C. § 6930(a), generators are required to file with an authorized State a notification (or, if necessary, a subsequent notification) including the type of waste handled and the type of hazardous waste activity (e.g., change to Large Quantity Generator status).

36. Section 3010(a) of RCRA, 42 U.S.C. § 6930(a), is implemented through U.S. EPA Form 8700-12 (OMB 2050-0024), which requires notification if, among other things, a generator's hazardous waste activity changes to Large Quantity Generator status.

37. In 2017 and 2019, Respondent did not submit a notification of the change of the facility's type of hazardous waste activity to Large Quantity Generator status in relevant months, in violation of Section 3010(a) of RCRA, 42 U.S.C. § 6930(a).

38. Pursuant to Ohio Admin. Code 3745-52-41(A), a generator of more than 1,000 kilograms of hazardous waste must provide to the director or the director's designee the data necessary for the department to prepare and submit Ohio's hazardous waste report as required. A Biennial Report is due by March 1 of each even numbered year, covering the preceding calendar year.

39. In 2018, Respondent did not prepare and submit a biennial report to Ohio EPA by March 1 for the preceding calendar year (2017), in violation of Ohio Admin. Code 3745-52-41(A).

40. In 2020, Respondent did not prepare and submit a biennial report to Ohio EPA by March 1 for the preceding calendar year (2019), in violation of Ohio Admin. Code 3745-52-41(A).

Count II: Failure to Notify U.S. EPA of Imports of Hazardous Waste

41. Complainant incorporates paragraphs 1 through 32 of this CAFO as though set forth in this paragraph.

42. Pursuant to 40 C.F.R. § 262.84(a)(1) importers of shipments covered under a consent from U.S. EPA to the country of export issued before December 31, 2016, are subject to that approval and the requirements that existed at the time of that approval until the approval period expires. Otherwise, any other person who imports hazardous waste from a foreign country into the United States must comply with the requirements of 40 C.F.R. Part 262 and the special requirements of 40 C.F.R. Part 262, Subpart H.

43. Pursuant to 40 C.F.R. § 262.84(a)(2), in cases where the country of export does not require the foreign exporter to submit a notification and obtain consent to the export prior to shipment, the importer must submit a notification to U.S. EPA in accordance with 40 C.F.R.

§ 262.84(b).

44. 40 C.F.R. § 262.84(b) applies in cases where the competent authority of the country of export does not regulate the waste as hazardous waste and thus does not require the foreign exporter to submit to it a notification proposing export and to obtain consent from U.S. EPA and the competent authorities for the countries of transit, but U.S. EPA does regulate the waste as hazardous waste.

45. Pursuant to 40 C.F.R. § 262.84(b)(1) importers must provide notification to U.S. EPA of the proposed transboundary movement of hazardous waste at least 60 days before the first shipment is expected to depart the country of export.

46. There was no U.S. EPA-issued consent for any shipment from PharmaChem in the Bahamas prior to 2021.

47. Under 40 C.F.R. § 262.84(a)(1), 40 C.F.R. Part 262 and the special requirements of 40 C.F.R. Part 262, Subpart H applied to the imports of hazardous waste described in paragraph 26 because there was no U.S. EPA consent prior to 2021.

48. Under 40 C.F.R. § 262.84(h)(1)(i), the importer shall keep and provide to U.S. EPA, a copy of each notification that the importer sends to U.S. EPA under 40 C.F.R. § 262.84(b)(1).

49. In the RFI sent on February 18, 2021, U.S. EPA requested any documentation demonstrating compliance with the certification/notification requirement in 40 C.F.R. § 262.84(b).

50. Respondent did not provide any documentation demonstrating notification to U.S. EPA of the proposed transboundary movement of hazardous waste at least 60 days before the first shipment is expected to depart the country of export required under 40 C.F.R. § 262.84(a) and (b)(1).

51. Respondent failed to notify U.S. EPA of the proposed transboundary movement of hazardous waste at least 60 days before the first shipment was expected to depart the country of export from July 1, 2018 through February 21, 2020 for at least 44 manifests for waste flammable liquids/bulk mixed solvents/D001, F003, F005 hazardous waste shipped which also constituted imports of hazardous waste destined for Geocycle/Holcim (SCD003368891), in violation of 40 C.F.R. § 262.84(b)(1).

52. By failing to provide to U.S. EPA a copy of any notification of the shipments of hazardous waste from PharmaChem in the Bahamas prior to the first shipment of hazardous waste upon request, Respondent violated 40 C.F.R. § 262.84(h)(1)(i).

Count III: Noncompliant Manifests and Failure to Include Movement Documents

Accompanying Importation

53. Complainant incorporates paragraphs 1 through 32 of this CAFO as though set forth in this paragraph.

54. Under 40 C.F.R. § 262.84(c)(1), an importer of hazardous waste must meet all the requirements of 40 C.F.R. § 262.20 for the manifest with the following exceptions: (i) in place of the generator's name, address and U.S. EPA identification number, the name and address of the foreign generator and the importer's name, address and U.S. EPA identification number must be used per 40 C.F.R. § 262.84(c)(1)(i); (ii) in place of the generator's signature on the certification statement, the importer or his agent must sign and date the certification and obtain the signature of the initial transporter per 40 C.F.R. § 262.84(c)(1)(ii); and (iii) in the International Shipments block, the importer must check the import box and enter the point of entry (city and State) into the United States per 40 C.F.R. § 262.84(c)(3).

55. Respondent failed to meet the requirements in 40 C.F.R. § 262.84(c)(1)(i), (ii), and

(c)(3) on at least 44 manifests, from July 1, 2018 through February 21, 2020, for waste flammable liquids/bulk mixed solvents/D001, F003, F005 hazardous waste shipped which also constituted imports of hazardous waste destined for Geocycle/Holcim (SCD003368891), in violation of 40 C.F.R. § 262.84(c)(1) and (3).

56. Pursuant to 40 C.F.R. § 262.84(d)(1), the importer must ensure that a movement document meeting the conditions of 40 C.F.R. § 262.84(d)(2) accompanies each transboundary movement of hazardous wastes from the initiation of the shipment in the country of export until it reaches the receiving facility, including cases in which the hazardous waste is stored and/or sorted by the importer prior to shipment to the receiving facility, except as provided in 40 C.F.R. § 262.84(d)(1)(i) and (ii).

57. Respondent violated 40 C.F.R. § 262.84(d)(1) by failing to ensure that a movement document meeting the conditions in 40 C.F.R. § 262.84(d)(2) accompanied each transboundary movement of hazardous waste for 44 import shipments of waste manifested with Respondent's U.S. EPA identification number destined for Geocycle/Holcim from at least July 1, 2018 through February 21, 2020.

Count IV: Failure to Import Under Valid Written Contract

58. Complainant incorporates paragraphs 1 through 32 of this CAFO as though set forth in this paragraph.

59. Under 40 C.F.R. § 262.84(f)(1), imports of hazardous waste must occur under the terms of a valid written contract, chain of contracts, or equivalent arrangements (when the movement occurs between parties controlled by the same corporate or legal entity). Such contracts or equivalent arrangements must be executed by the foreign exporter, importer, and the owner or operator of the receiving facility, and must specify responsibilities for each.

60. Under 40 C.F.R. § 262.84(f)(8), importers must submit to U.S. EPA upon request copies of contracts, chain of contract, or equivalent arrangements.

61. 40 C.F.R. § 262.84(h)(1)(ii) requires that the importer shall keep and provide to U.S. EPA upon request a copy of each contract or equivalent arrangement established per 40 C.F.R. § 262.84(f) for at least three years from the expiration date of the contract or equivalent arrangement.

62. In the RFI sent to Respondent on February 18, 2021, U.S. EPA requested Respondent to provide any recordkeeping documentation required by 40 C.F.R. §§ 262.40 and 262.84(h).

63. In response to U.S. EPA's RFI, Respondent did not provide U.S. EPA with a contract or equivalent arrangement required under 40 C.F.R. § 262.84(f)(1).

64. Respondent failed to comply with 40 C.F.R. § 262.84(f)(1) by importing hazardous waste without a valid written contract.

65. Respondent failed to provide to U.S. EPA upon request, a copy of each contract or equivalent arrangement established per 40 C.F.R. § 262.84(f) in violation of 40 C.F.R. § 262.84(h)(1)(ii).

Compliance Order

66. Pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), Respondent is hereby ordered to comply with the following requirements as expeditiously as possible and no later than 30 days from the effective date of this CAFO.

67. Respondent shall file with Ohio Biennial Hazardous Waste Reports covering the years 2017 and 2019.

68. Respondent shall submit the following certification to U.S. EPA that it has complied

with the requirements in paragraph 67, above:

I certify under the penalty of law that based on my review of all relevant information and documents, and inquiring of those individuals immediately responsible for providing all relevant information and documents, Univar Solutions is in compliance with the requirements of this Compliance Order. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date _____ Signature and Title _____

69. If unable to certify compliance in paragraph 68, Respondent shall submit notification explaining why it is unable to comply, the actions it is taking to comply, and a proposed date that it will comply.

70. Respondent shall submit all certifications and notifications required under the Compliance Order to:

Land Enforcement and Compliance Assurance Branch
Enforcement and Compliance Assurance Division
U.S. EPA, Region 5
R5lecab@epa.gov

and

Bryan Gangwisch
Enforcement and Compliance Assurance Division
U.S. EPA, Region 5
gangwisch.bryan@epa.gov

Civil Penalty Order

71. Pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), Complainant determined that an appropriate civil penalty to settle this action is \$103,557. In determining the penalty amount, Complainant took into account the above Factual Allegations, the seriousness of the violations, any good faith efforts to comply with the applicable requirements, and other factors as justice may require. Complainant also considered U.S. EPA's RCRA Civil Penalty Policy, dated June 23, 2003.

72. Within 30 days after the effective date of this CAFO, Respondent must pay a \$103,557 civil penalty for the RCRA violations by:

For checks sent by regular U.S. Postal Service mail, sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

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

The check must state Respondent's name and the docket number of this CAFO.

For checks sent by express mail, sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

U.S. Bank
Government Lockbox 979077
U.S. EPA Fines and Penalties
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, Missouri 63101

The check must state Respondent's name and the docket number of this CAFO.

For wire transfer, sending funds electronically, payable to "Treasurer, United States of America," and sent to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read:
“D68010727 Environmental Protection Agency”

In the comment or description field of the wire transfer, state Respondent’s name and the docket number of this CAFO.

For ACH electronic funds transfer, sending funds electronically, payable to “Treasurer, United States of America,” and sent to:

US Treasury REX / Cashlink ACH Receiver
ABA: 051036706
Account Number: 310006, Environmental Protection Agency
CTX Format Transaction Code 22 – checking

By paying online, following the instructions found here:

WWW.PAY.GOV

Use the Search Public Forms option and enter ‘sfo 1.1’ in the search field.
Open form and complete required fields.

73. Respondent must send a notice of payment that states Respondent’s name and the case docket number to U.S. EPA at the following addresses when it pays the penalty:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
Or via email at r5hearingclerk@epa.gov

Land Enforcement and Compliance Assurance Branch
Enforcement and Compliance Assurance Division
U.S. EPA, Region 5
R5lecab@epa.gov

Bryan Gangwisch (ECR-17J)
Land Enforcement and Compliance Assurance Branch
Enforcement and Compliance Assurance Division
U.S. EPA, Region 5
gangwisch.bryan@epa.gov

Matthew Russo (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
russo.matthew@epa.gov

74. This civil penalty is not deductible for federal tax purposes.

75. If Respondent does not timely pay the civil penalty, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties, and the United States' enforcement expenses for the collection action. The validity, amount, and appropriateness of the civil penalty are not reviewable in a collection action.

76. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date payment was due at a rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

77. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: russo.matthew@epa.gov (for Complainant), and michael.scanlon@btlaw.com and patrise.johnson@univarsolutions.com (for Respondent). Respondent understands that the CAFO will become publicly available upon filing.

78. Respondents' full compliance with this CAFO shall only resolve Respondent's liability for federal civil penalties under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), for the violations alleged in the CAFO.

79. This CAFO does not affect the right of U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

80. Payment of the civil penalty does not affect Respondent's continuing obligation to comply with RCRA and other applicable federal, state, local laws or permits.

81. Respondent certifies that it is complying fully with the statutory and regulatory provisions alleged violated in this CAFO.

82. This CAFO is a "final order" for purposes of 40 C.F.R. § 22.31, U.S. EPA's RCRA Civil Penalty Policy, and U.S. EPA's Hazardous Waste Civil Enforcement Response Policy (December 2003).

83. The terms of this CAFO bind Respondent, its successors, and assigns.

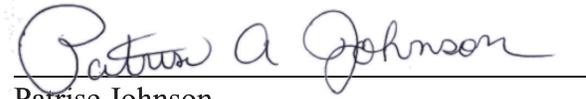
84. Each person signing this agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

85. Each party agrees to bear its own costs and attorney's fees in this action.

86. This CAFO constitutes the entire agreement between the parties.

Univar Solutions USA, Inc., Respondent

December 13, 2022
Date



Patriise Johnson
Senior Corporate Counsel
Univar Solutions USA, Inc.

United States Environmental Protection Agency, Complainant

Date

**MICHAEL
HARRIS** 

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

In the Matter of:
Univar Solutions USA, Inc.
Docket No. RCRA-05-2023-0001

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

ANN COYLE Digitally signed by ANN
COYLE
Date: 2022.12.16
14:47:07 -06'00'

Date

Ann L. Coyle
Regional Judicial Officer
United States Environmental Protection Agency
Region 5