

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

FILED

Sep 30, 2025

7:02 am

U.S. EPA REGION 3
HEARING CLERK

In the Matter of:	:
	:
James River Petroleum, Inc.	: U.S. EPA Docket No. RCRA-03-2025-0118
10487 Lakeridge Parkway Suite 100	:
Ashland, Virginia 23005	: Proceeding under Section 9006 of the Resource
	: Conservation and Recovery Act, 42 U.S.C. Section
Respondent.	: 6991e
	:
E-Fueling Network	:
2216 Charles City Road	:
Richmond, Virginia 23231	:
	:
Facility.	:
	:

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 James River Petroleum, Inc. ("Respondent") (collectively the "Parties"), pursuant to Section 9006 of the Solid Waste Disposal 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 (or the "Act") 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. EPA has given the Commonwealth of 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. Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d), authorizes the EPA to assess civil penalties against any owner and operator of an underground storage tank (“UST”) who fails to comply with, among other things, 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.
15. Effective October 28, 1998, pursuant to Section 9004 of RCRA, 42 U.S.C. § 6991c, and 40 C.F.R. Part 281, Subpart A, EPA approved the Commonwealth of Virginia to administer a state UST management program *in lieu* of the Federal UST management program established under Subtitle I of RCRA, 42 U.S.C. §§ 6991-6991m. An updated Virginia UST management program was approved by EPA, and became effective on May 3, 2021. The provisions of the Virginia UST management program which EPA approved have become requirements of RCRA Subtitle I and are, accordingly, enforceable by EPA pursuant to Section 9006 of RCRA, 42 U.S.C. § 6991e. Virginia’s authorized UST management program regulations are set forth in the Virginia Code as “Underground Storage Tanks: Technical Standards and Corrective Action Requirements” (“VA UST Regulations”), 9 VAC § 25-580 *et seq.* and 9 VAC § 25-590 *et seq.*
16. At all times relevant to the alleged violations in this Consent Agreement and Final Order, Respondent has been a Virginia corporation.
17. At all times relevant to the alleged violations in this Consent Agreement and Final Order, Respondent has been a “person” as defined by Section 9001(5) of RCRA, 42 U.S.C. § 6991(5), and 9 VAC § 25-580-10.
18. At all times relevant to the alleged violations in this Consent Agreement and Final Order, Respondent has been the “owner” and/or “operator,” as those terms are defined by Section 9001(3) and (4) of RCRA, 42 U.S.C. § 6991(3) and (4), and 9 VAC § 25-580-10, of “USTs” and “UST systems,” at the E-Fueling Network facility located at 2216 Charles City Road, Richmond, Virginia 23231 (“the Facility”).
19. On August 10, 2022, under the authority of Section 9005(a) of RCRA, 42 U.S.C. § 6991d(a), an EPA inspector conducted a compliance evaluation inspection at the Facility (“CEI”).
20. At the time of the CEI, and at all times relevant to the applicable violations alleged herein, three (3) USTs, as described below, each of which contained a “regulated

substance” as that term is defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 9 VAC § 25-580-10, were located at the Facility:

Table 1: UST & Piping Details for the Facility

Tank #	Material Stored	Capacity (gal.)	Installation Date	Tank Construction Material	Piping Construction Material
T1	Regular	12,000	6/23/2010	Fiberglass-reinforced plastic	Double Walled, Secondary Containment, Other: Polyflex
2C	Diesel	10,000	6/23/2012	Fiberglass-reinforced plastic	DW, Secondary Containment, Other: Polyflex
3C	Diesel	15,000	3/23/2010	Fiberglass-reinforced plastic	DW, Secondary Containment, Other: Polyflex

21. At all times relevant to the alleged violations in this Consent Agreement and Final Order, USTs 1-3 are “new tank systems,” as defined in 9 VAC 25-580-10, which states that a “new tank system” means a tank system used to contain an accumulation of regulated substances for which installation has commenced after December 22, 1988.
22. At all times relevant to the alleged violations in this Consent Agreement and Final Order, all the USTs at the Facility and the respective underground piping associated with each UST were a “petroleum UST system,” as the term is defined in 9 VAC § 25-580-10.

Count 1

Failure to Use Spill Prevention System

23. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
24. Pursuant to 9 VAC 25-580-50(3), “In order to prevent releases due to structural failure, corrosion, or spills and overfills for as long as the UST system is used to store regulated substances, all owners and operators of new UST systems must meet the requirements in this section,” including “[s]pill and overfill prevention equipment.” This includes a requirement to use spill and overfill prevention equipment that “will prevent release of product to the environment when the transfer hose is detached from the fill pipe (for example, a spill catchment basin).” 9 VAC 25-580-50(3)(a)(1). In addition, “Spill and overfill protection equipment must be periodically tested or inspected in accordance with 9VAC25-580-82.” 9 VAC 25-580-50(3)(d).
25. On August 2, 2022, prior to the EPA’s inspection, the EPA asked the Facility for copies of spill bucket testing conducted within the last three years. On August 8, 2022, the

Facility provided spill bucket testing documentation that showed T1 failed spill bucket testing on December 14, 2020.

26. The EPA requested evidence showing when the spill bucket was repaired and evidence showing it passed testing following the failed test. On February 10, 2023, the Facility provided a copy of passing spill bucket integrity testing that was conducted on February 8, 2023.
27. Based on this information, Respondent failed to use a spill prevention system per 9 VAC 25-580-50(3) for T1 from December 14, 2020 to February 7, 2023.
28. In failing to comply with 9 VAC 25-580-50(3), Respondent violated Subtitle I of RCRA, 42 U.S.C. §§ 6991-6991m, and is subject to the assessment of penalties under Section 9006(d)(2) of RCRA, 42 U.S.C. § 6991e(d)(2).

Count 2

Failure to Comply with Financial Responsibility Requirements

29. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
30. Pursuant to 9 VAC 25-590-40, owners and operators of petroleum USTs “shall demonstrate financial responsibility for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases arising from the operation of petroleum USTs” per certain amounts. In addition, owners and operators who demonstrate financial responsibility shall maintain copies of those records on which the determination is based.” 9 VAC 25-590-40(D).
31. An owner has 120 days from the end of the fiscal year to submit a demonstration of financial responsibility. The end of the fiscal year is September 30, and the demonstration of financial responsibility must be submitted by February 1.
32. A VADEQ representative stated on November 2, 2022 that VADEQ last received a complete submittal of financial responsibility for the fiscal year that ended on September 30, 2019.
33. Prior to EPA’s inspection, EPA asked the Facility for a copy of the method being used to cover the financial responsibility requirements for the USTs. On August 16, 2022, the Facility sent the EPA inspector an e-mail saying that the storage tank pollution coverage is provided through the Virginia Superfund.
34. On August 17, 2022, the EPA e-mailed VADEQ, and VADEQ responded that it did not have an updated demonstration of financial responsibility on file from JRP. VADEQ sent

a letter to JRP requesting that the Facility submit a copy of the mechanism currently in place to demonstrate financial responsibility for the USTs owned by Respondent.

35. On November 2, 2022, VADEQ indicated that the Facility submitted sufficient evidence of financial responsibility for the underground storage tanks in question.
36. Based on this information, Respondent failed to comply with the financial responsibility requirements in 9 VAC 25-590-40 from February 1, 2021 to November 2, 2022.
37. In failing to comply with 9 VAC 25-590-40, Respondent violated Subtitle I of RCRA, 42 U.S.C. §§ 6991-6991m, and is subject to the assessment of penalties under Section 9006(d)(2) of RCRA, 42 U.S.C. § 6991e(d)(2).

Count 3

Failure to Conduct Periodic Walkthrough Inspections Every 30 Days

38. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
39. Pursuant to 9 VAC 25-580-85, owners and operators of UST systems must conduct walkthrough inspections to check spill prevention equipment, release detection equipment, containment sumps, and handheld release detection equipment.
40. The EPA requested documentation of the Facility's walkthrough inspections for the prior 12 month period. During EPA's Inspection, the Facility showed the inspector a document that had a checkmark for what appeared to be the months of May to August 2022. On February 3, 2023, the Facility emailed a copy of a walkthrough inspection document that appeared to cover the period of August 2021 to August 2022. This documentation showed that for five out of 12 months prior to the Inspection, the 30-day walkthroughs were performed late in five instances.
41. Based on this information, JRP failed to perform timely walkthrough inspections per 9 VAC 25-580-85 on the following days:
 - August 31, 2021 to September 4, 2021 (5 days late);
 - November 2, 2021 to November 10, 2021 (9 days late);
 - January 4, 2022 to January 5, 2022 (2 days late);
 - March 7, 2022 to March 9, 2022 (3 days late); and
 - July 2, 2022 to July 4, 2022 (3 days late).
42. In failing to comply with 9 VAC 25-580-85, Respondent violated Subtitle I of RCRA, 42 U.S.C. §§ 6991-6991m, and is subject to the assessment of penalties under Section 9006(d)(2) of RCRA, 42 U.S.C. § 6991e(d)(2).

CIVIL PENALTY

43. 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 **Seventeen Thousand Nine Hundred Sixty-Seven dollars (\$17,967)**, which Respondent shall be liable to pay in accordance with the terms set forth below.
44. In determining the amount of the civil penalty to be assessed, EPA has taken into account the factors specified in Sections 9006(c) and (e) of RCRA, 42 U.S.C. §§ 6991e(c) and (e). After considering these factors, EPA has determined that an appropriate penalty to settle this action is \$17,967.
45. 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 [EPA’s How to Make a Payment website](#) and will not pay with a paper check.
46. When making a payment, Respondent shall:
- a. Identify every payment with Respondent’s name and the docket number of this Consent Agreement, **EPA Docket No. RCRA-03-2025-0118**.
 - 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):

Aviva H. Reinfeld, Esq.
Assistant Regional Counsel
reinfeld.aviva@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.

47. 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 Internal Revenue Service (“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.

48. 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 the 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.

49. 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.
50. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Consent Agreement shall not be deductible for purposes of federal taxes.
51. 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).
52. The Parties consent to service of the Final Order by e-mail at the following valid email addresses: reinfeld.aviva@epa.gov (for Complainant), and ssullivan@williamsmullen.com (for Respondent).

GENERAL SETTLEMENT CONDITIONS

53. 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.
54. 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.

55. 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

56. 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 RCRA Subtitle I, or any regulations promulgated thereunder.

RESERVATION OF RIGHTS

57. 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.

EXECUTION /PARTIES BOUND

58. 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 providing the signature below, the person who signs this

Consent Agreement on behalf of Respondent is acknowledging that the person signing 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

59. 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

60. 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.

For Respondent: James River Petroleum, Inc.

Date:

9/26/25

Lloyd T. Little
CEO

For the Complainant:

After reviewing the Consent Agreement and other pertinent matters, I, the undersigned Acting Director of the Enforcement & 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: 2025.09.29 12:19:03 -04'00'

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

Attorney for Complainant:

By: **AVIVA REINFELD** Digitally signed by AVIVA
REINFELD
Date: 2025.09.26 16:25:53 -04'00'

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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

FILED

Sep 30, 2025

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10487 Lakeridge Parkway Suite 100 :
Ashland, Virginia 23005 : Proceeding under Section 9006 of the Resource
 : Conservation and Recovery Act, 42 U.S.C.
Respondent. : Section 6991e

E-Fueling Network
2216 Charles City Road
Richmond, Virginia 23231

Facility.

FINAL ORDER

Complainant, the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3, and Respondent, James River Petroleum, Inc. 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) (*for Super Consent Agreement/Final Orders*) or Sections 22.18(b)(2) and (3) (*for Consent Agreement/Final Orders*)]. 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 the RCRA, 42 U.S.C. Section § 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 **SEVENTEEN THOUSAND NINE HUNDRED SIXTY-SEVEN DOLLARS (\$17,967.00)**, 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: **DONZETTA
THOMAS**
Regional Judicial and Presiding Officer
U.S. EPA Region 3

Digitally signed by DONZETTA
THOMAS
Date: 2025.09.29 14:47:13
-04'00'

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

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Ashland, Virginia 23005	: Proceeding under Section 9006 of the Resource
	: Conservation and Recovery Act, 42 U.S.C. Section
Respondent.	: 6991e
	:
E-Fueling Network	:
2216 Charles City Road	:
Richmond, Virginia 23231	:
	:
Facility.	:

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:

Lloyd T. Little, Owner
James River Petroleum, Inc.
legal@jrpenenergy.com
10487 Lakeridge Parkway Suite 100
Ashland, Virginia 23005

Sean Sullivan
Williams Mullen
ssullivan@williamsmullen.com
301 Fayetteville Street, Suite 1700
Raleigh, NC 27601

Aviva Reinfeld
Assistant Regional Counsel
U.S. EPA, Region 3
reinfeld.aviva@epa.gov

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

BEVIN ESPOSITO Digitally signed by BEVIN
ESPOSITO
Date: 2025.09.30 07:05:34 -04'00'

[Digital Signature and Date]

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 3