

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

In the Matter of:

Lockwood Hills LLC  
Respondent.

Proceeding under Section 3008 of the  
Solid Waste Disposal Act, as amended

**CONSENT AGREEMENT AND FINAL ORDER**

**Docket No. RCRA-02-2025-7100**

**PRELIMINARY STATEMENT**

This Consent Agreement is entered into under the authority of Sections 3008(a) and 4005(d)(4)(A)(i) of the Resource Conservation and Recovery Act, as amended (“RCRA” or “the Act”), 42 U.S.C. §§ 6928(a) and 6945(d)(4)(A)(i), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation, Termination or Suspension of Permits, 40 C.F.R. Part 22.

Section 4005(d)(4)(A) of RCRA, 42 U.S.C. § 6945(d)(4)(A), specifies that the EPA Administrator may use the authorities set forth in Sections 3007 and 3008 of RCRA, 42 U.S.C. §§ 6927 and 6928, to enforce the prohibition on open dumping under Section 4005(a) of RCRA, 42 U.S.C. § 6945(a), with respect to coal combustion residuals units.

Pursuant to 40 C.F.R. § 22.13(b), where the parties agree to settlement of one or more causes of action before the filing of an administrative complaint, a proceeding may be simultaneously commenced and concluded by the issuance of a Consent Agreement and Final Order (“CA/FO”) pursuant to 40 C.F.R. §§ 22.18(b)(2) and (3). This administrative proceeding constitutes one that is simultaneously being commenced and concluded pursuant to said provisions.

The Complainant and Respondent agree, by entering into this CA/FO, that settlement of this matter upon the terms set forth in this CA/FO is an appropriate means of resolving without litigation the claims specified herein against Lockwood Hills LLC (“Lockwood” or “Respondent”) regarding the Lockwood Landfill, as identified below. The parties had an initial in-person settlement conference in February 2024 and numerous discussions thereafter, all of which led to this settlement. The Findings of Fact and Conclusions of Law set forth below, which pertain to times relevant to this proceeding, are not intended, nor are they to be construed, as Respondent

either admitting or denying such findings and conclusions. No adjudicated finding of fact or conclusions of law have been made.

### **STATUTORY AND REGULATORY FRAMEWORK**

1. RCRA, enacted on October 21, 1976, and subsequently amended, establishes a framework for the regulation of the handling and management of non-hazardous and hazardous solid wastes. *See* 42 U.S.C. § 6901, et seq.

2. RCRA Subtitle D establishes a framework for the regulation of the handling and management of solid wastes, including coal combustion residuals (“CCR”). *See* 42 U.S.C. §§ 6941- 6949.

3. RCRA authorizes EPA to use the authority provided by 42 U.S.C. §§ 6927 and 6928 to enforce the prohibition on open dumping with respect to a coal combustion residuals unit in nonparticipating states. 42 U.S.C. § 6945(d)(2). The State of New York is a “nonparticipating state” within the meaning of 42 U.S.C. § 6945(d)(2)(A).

4. In April 2015, EPA promulgated regulatory requirements for the disposal of CCR in landfills and surface impoundments. The CCR regulations are set forth at 40 C.F.R. Part 257, Subpart D (Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments) (“CCR Rule”). The CCR Rule establishes requirements for location standards, groundwater monitoring, corrective action, closure, post closure care, technical operating standards, inspection, monitoring, recordkeeping, and reporting. The regulatory requirements established in the CCR Rule took effect on October 19, 2015, subject to amendments promulgated by EPA after that date.

### **EPA’S FINDINGS OF FACT AND CONCLUSIONS OF LAW**

#### **Notice**

5. EPA has given notice of this action to the State of New York.

#### **Respondent**

6. Respondent is Lockwood.

7. Respondent is a “person” as that term is defined in Section 1004(15) of the Act, 42 U.S.C. § 6903(15).

8. Respondent owns and operates a landfill located in the town of Torrey, New York (the "Lockwood Landfill").

9. At all relevant times, the Lockwood Landfill was and is a "facility" within the meaning of 40 C.F.R. § 257.53.

10. "Coal combustion residuals" (CCR) are defined at 40 C.F.R. § 257.53 as "fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers."

11. A "CCR unit" is defined at 40 C.F.R. § 257.53 as "any CCR landfill, CCR surface impoundment, or lateral expansion of a CCR unit, or a combination of more than one of these units based on the context of the paragraph(s) in which it is used."

12. An "existing CCR landfill" is defined at 40 C.F.R. § 257.53 as "a CCR landfill that receives CCR both before and after October 19, 2015, or for which construction commenced prior to October 19, 2015 and receives CCR on or after October 19, 2015."

#### **Lockwood Landfill**

13. The Lockwood Landfill is a 28.4-acre landfill authorized to receive CCR according to the terms and conditions of a 6 New York Code Rules and Regulations Part 360 Solid Waste Management Facility permit (Permit No. 8-5736-00005/00003) issued by the New York State Department of Environmental Conservation ("New York Permit").

14. Respondent has informed EPA that the Lockwood Landfill previously received CCR from Greenidge Power Generating Station as authorized by the New York Permit when it operated as a coal-fired power plant but has not received CCR from the Station since it ceased using coal in 2011. Previously disposed material including CCR was excavated and placed in the Lockwood Landfill in 2015, 2016 and 2017.

15. The Lockwood Landfill, which received CCR both before and after October 19, 2015, is and was a "CCR unit" and an "existing CCR landfill" as those terms are defined in 40 C.F.R. § 257.53.

16. The Lockwood Landfill is and has been subject to all requirements applicable to existing CCR landfills set forth in 40 C.F.R. Part 257 Subpart D since October 19, 2015.

17. Pursuant to 40 C.F.R. § 257.107(a), Respondent has established and maintains a publicly accessible internet site (CCR website) containing information required by the CCR Rule.

### **Pre-filing Settlement Discussions**

18. On December 6, 2022, EPA emailed Lockwood a Notice of Potential Violations/ Opportunity to Confer (“NOPVOC”) to determine its interest in pre-filing discussions regarding the potential violations of the CCR Rule at the Lockwood Landfill. EPA’s NOPVOC alleged Respondent’s failure, at times during 2016 to 2022, to:

- i. Install a groundwater monitoring system that meets the performance standards set forth in 40 C.F.R. § 257.91.
- ii. Timely comply with certain detection monitoring sampling and analytical requirements set forth in 40 C.F.R. § 257.94(b).
- iii. Prepare an initial annual groundwater and corrective action report for its landfill by January 31, 2018, and a subsequent annual report by January 31, 2019, and to post annual groundwater and corrective action reports covering the years 2017 and 2018 on its CCR website, as required by 40 C.F.R. §§ 257.90(e) and (f).
- iv. Include all required groundwater well data in its 2019, 2020 and 2021 annual groundwater monitoring reports as required by 40 C.F.R. § 257.90(e)(3).
- v. Timely prepare and post an initial closure and post-closure plan on its CCR Website as required by 40 C.F.R. §§ 257.102 and 257.104.
- vi. Timely certify its groundwater monitoring system, and timely post such certification on its CCR Website, as required by 40 C.F.R. §§ 257.91(f) and (g).
- vii. Timely certify its statistical method, and timely post such certification on its CCR Website, as required by the groundwater sampling and analysis requirements set forth in 40 C.F.R. §§ 257.93(f) and (j).
- viii. Timely develop and post on its CCR Website a run on/off plan as required by 40 C.F.R. §§ 257.81(c)(3)(i) and (d).
- ix. Complete annual inspections and post inspection reports to its CCR website in 2016, 2017, 2018, and 2019 as required by 40 C.F.R. § 257.84(b).
- x. Timely develop and post on its CCR website a fugitive dust plan as required by 40 C.F.R. § 257.80.

- xi. Analyze the Appendix IV analytes antimony, arsenic, cadmium, and thallium to the lowest concentration levels that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions that are available to the facility, as required by 40 C.F.R. § 257.93(g)(5); and
- xii. Fully characterize groundwater flow rate and direction as required by 40 C.F.R. § 257.91(b)(1).

19. On January 24, 2023, Respondent submitted a response to EPA's NOPVOC. In that response, Respondent disputed EPA's alleged potential violations and explained its compliance actions at the site.

20. Following the receipt of Respondent's response to EPA's NOPVOC, the parties have had numerous informal settlement conferences and agreed to settle this matter as provided herein.

#### **CONSENT AGREEMENT**

Pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, and 40 C.F.R. § 22.18 of the Consolidated Rules of Practice, it is hereby agreed by and between the parties hereto, and voluntarily and knowingly accepted by Respondent, that Respondent, for purposes of this Consent Agreement and in the interest of settling this matter expeditiously without the time, expense or uncertainty of a formal adjudicatory hearing on the merits: (a) admits the jurisdictional basis for EPA prosecuting this case; (b) neither admits nor denies EPA's Findings of Fact and Conclusions of Law; (c) consents to the assessment of the civil penalty as set forth below; (d) consents to the issuance of the Final Order incorporating all the provisions of this Consent Agreement; and (e) waives its right to contest or appeal that Final Order.

Pursuant to 40 C.F.R. § 22.31(b), the executed CA/FO shall become effective and binding when filed with the Regional Hearing Clerk for Region 2 (such date henceforth referred to as the "effective date").

Based upon the foregoing, and pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, and 40 C.F.R. § 22.18, Respondent voluntarily and knowingly agrees to, and shall comply with, the following terms to the extent it has not already done so:

- 1. Within ninety (90) calendar days of the effective date of the Final Order, Respondent shall:
  - i. update the background levels for all 40 C.F.R. Part 257 Appendix III and Appendix IV constituents utilizing the analytical method(s) Respondent initiated in 2022, consistent with the guidelines in Chapter 5 of the Statistical

Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance, March 2009, EPA 530/R-09-007; and

- ii. implement measures to ensure that all 40 C.F.R. Part 257 Appendix III and Appendix IV constituents will be analyzed in future sampling events to the appropriate practical quantification limits as required by 40 C.F.R. § 257.93(g)(5).

2. Within ninety (90) calendar days of the effective date of the Final Order, Respondent shall:

- i. amend its 2019, 2020 and 2021 Annual Groundwater Monitoring and Corrective Action Reports ("GWMCA Reports") as necessary to include reasonably available laboratory analytical reports, statistical analysis reports, well installation reports, and well purging and sampling field data sheets for each groundwater sampling event at the Lockwood Landfill for those years;
- ii. amend its 2021 and/or 2022 GWMCA Reports as necessary to correct any duplication of groundwater elevations measurements in Figure 1 of the Reports; and
- iii. post the amended Reports on its CCR website pursuant to 40 C.F.R. § 257.90(f).

3. Install and implement a groundwater monitoring system that meets the requirements set forth in 40 C.F.R. § 257.91 as follows:

- i. Within two hundred and ten (210) calendar days of the effective date of the Final Order, Respondent shall:
  - a. install clustered piezometers (or, alternatively, monitoring wells, at Respondent's discretion) screened in the glacial till unit and in the bedrock unit along the east-northeastern, southern near eastern corner, northern and western landfill waste boundaries (provided, however, that if it is not technically feasible to locate the piezometers or wells along the boundary and documented as such, Respondent shall have the option to install the piezometers or wells at another location as close to the boundary as feasible) to accurately characterize groundwater flow conditions and thereafter commence four quarterly measurements of synoptic groundwater elevations

at each piezometer and monitoring well to evaluate the groundwater flow directions;

- ii. Following commencement of the quarterly measurements, Respondent shall provide in its annual GWMCA Reports potentiometric surface maps and all groundwater elevation data from its temporary piezometers and groundwater monitoring system from each synoptic measurement event conducted within the reporting year. The first annual GWMCA Report containing this information shall also include boring logs and construction diagrams for each temporary piezometer, as well as survey data;
- iii. Upon completion and analysis of the above four quarterly measurement events, Respondent shall make, and include in its next annual GWMCA Report, a determination as to whether additional wells are necessary to:
  - a) accurately represent the quality of background groundwater that has not been affected by leakage from the landfill; and/or
  - b) accurately represent the quality of the groundwater passing the waste boundaries of the landfill; and
- iv. Respondent shall use interwell statistical methods to evaluate future downgradient sampling data, including for the determination of background groundwater quality in hydraulically upgradient or background well(s) not affected by leakage from the CCR unit, unless Respondent can conclusively demonstrate that wells used for intrawell statistical methods have not been affected by leakage from the CCR unit.
- v. Within two hundred and ten days (210) calendar days of the effective date of the Final Order, Respondent shall install the following wells at the northern landfill waste boundary:
  - a. Two wells (one couplet) screened in the glacial till unit and bedrock unit between the MW-1842/MW8942D couplet and the northwest corner of the landfill; and
  - b. Two wells (one couplet) screened in the glacial till unit and bedrock unit between the MW-1842/MW8942D couplet and the northeast corner of the landfill.

This CA/FO is not intended, and shall not be construed, to waive, extinguish or otherwise affect Respondent's obligation to comply with all applicable federal, state, and local laws and regulations relating to the management and disposal of CCR waste by Respondent.

4. Respondent agrees to pay a civil penalty in the amount of seventy-three thousand five hundred dollars (\$73,500.00) ("Assessed Penalty") within thirty (30) days after the date the Final Order ratifying this Agreement is filed with the Regional Hearing Clerk ("Filing Date").

5. 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>.

6. When making a payment, Respondent shall:

- i. Identify every payment with Respondent's name and the docket number of this Agreement (Docket No. RCRA-02-2025-7100 - In the Matter of Lockwood Hills LLC); and
- ii. Concurrently with any payment or within twenty-four (24) hours of any payment, Respondent shall serve proof of such payment to the following person(s):

Karen Maples, Regional Hearing Clerk  
US Environmental Protection Agency, Region 2  
290 Broadway, 17<sup>th</sup> Floor  
New York, New York 10007-1866  
[Maples.Karen@epa.gov](mailto:Maples.Karen@epa.gov)

Amy R. Chester, Assistant Regional Counsel  
Office of Regional Counsel  
US Environmental Protection Agency, Region 2  
290 Broadway, 16<sup>th</sup> Floor  
New York, New York 10007-1866  
[Chester.Amy@epa.gov](mailto:Chester.Amy@epa.gov)

and

US Environmental Protection Agency  
Cincinnati Finance Center  
Via electronic mail to:  
[CINWD\\_AcctsReceivable@epa.gov](mailto:CINWD_AcctsReceivable@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 EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent's name.

7. 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 Agreement, EPA is authorized to recover, in addition to the amount of the unpaid Assessed Penalty, the following amounts.

- i. Interest. Interest begins to accrue from the Filing Date. 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.
- ii. Handling Charges. Respondent will be assessed monthly a charge to cover EPA's costs of processing and handling overdue debts. If Respondent fails to pay the Assessed Penalty in accordance with this Agreement, EPA will assess a charge to cover the costs of handling any unpaid amounts for the first thirty (30) day period after the Filing 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.
- iii. 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 Filing Date.

8. 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 Agreement, EPA may take additional actions. Such actions EPA may take include, but are not limited to, the following.

- i. Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R. §§ 13.13 and 13.14.

- ii. 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.
- iii. Suspend or revoke Respondent's licenses or other privileges or suspend or disqualify Respondent from doing business with EPA or engaging in programs EPA sponsors or funds, per 40 C.F.R. § 13.17.
- iv. Refer this matter to the United States Department of Justice for litigation and collection, per 40 C.F.R. § 13.33.

9. 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.

10. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Agreement shall not be deductible for purposes of federal taxes.

11. EPA shall mail to Respondent (to the representative designated in Paragraph 12 of this Consent Agreement), a copy of the fully executed CA/FO. Respondent consents to service of the CA/FO upon it by email and by an employee of EPA other than the Regional Hearing Clerk.

12. Except as the parties may agree otherwise in writing, all documentation and information required to be submitted in accordance with the terms and conditions of this Consent Agreement shall be sent to:

Kiran Jain  
Environmental Engineer  
Enforcement and Compliance Assurance Division  
US Environmental Protection Agency, Region 2  
290 Broadway, 21st Floor  
New York, New York 10007-1866  
Jain.Kiran@epa.gov

and

Amy R. Chester, Assistant Regional Counsel  
Office of Regional Counsel  
US Environmental Protection Agency, Region 2  
290 Broadway, 16<sup>th</sup> Floor  
New York, New York 10007-1866  
Chester.Amy@epa.gov

Unless the above-named EPA contacts are later advised otherwise in writing, EPA shall address any future written communications related to this matter (including any correspondence related to payment of the penalty) to Respondent at the following address:

Dale Irwin, President  
Lockwood Hills LLC  
590 Plant Road, P.O. Box 187  
Dresden, New York 14441  
[dirwin@greenidge.com](mailto:dirwin@greenidge.com)

13. Full payment of the penalty described in Paragraph 4 of the Consent Agreement shall only resolve Respondent's liability for federal civil penalties for the alleged violation(s) and facts described in Paragraph 18 of EPA's Findings of Fact and Conclusions of Law. Full payment of this penalty shall not in any case affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

14. The provisions of this Consent Agreement shall be binding upon Respondent, and its successors or assigns.

15. Respondent waives its right to request or to seek any hearing in this matter including one on the terms and conditions set forth in the Consent Agreement and its accompanying Final Order and/or EPA's Findings of Fact and Conclusions of Law, above.

16. For purposes of the identification requirement of Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. § 162(f)(2)(A)(ii), performance of the work described in Paragraphs 1-3 of this Consent Agreement is restitution or required to come into compliance with law.

17. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, EPA is required to send to the Internal Revenue Service ("IRS") annually, a completed IRS Form 1098-F ("Fines, Penalties, and Other Amounts") with respect to any court order or settlement agreement (including administrative settlements), that requires a payor to pay an aggregate amount that EPA reasonably believes will be equal to, or in excess of, fifty thousand dollars (\$50,000) for the payor's violation of any law or the investigation or inquiry into the payor's potential violation of any law, including amounts paid for "restitution or remediation of property" or to come "into compliance with a law." EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (*i.e.*, a copy of IRS Form 1098-F). Failure to comply with providing IRS Form W-9 or Tax Identification Number ("TIN"), as described below, may subject Respondent to a penalty, per 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1. In order to provide EPA with sufficient information to enable it to fulfill these obligations, EPA herein requires, and Respondent herein agrees, that:

- i. Respondent shall complete an IRS Form W-9 ("Request for Taxpayer Identification Number and Certification"), which is available at <https://www.irs.gov/pub/irs-pdf/fw9.pdf>
- ii. Respondent shall therein certify that its completed IRS Form W-9 includes Respondent's correct TIN or that Respondent has applied and is waiting for issuance of a TIN;
- iii. Respondent shall email its completed Form W-9 to EPA's Cincinnati Finance Center at [wise.milton@epa.gov](mailto:wise.milton@epa.gov), within thirty (30) days after the Final Order ratifying this Agreement is filed with the Regional Hearing Clerk, and EPA recommends encrypting IRS Form W-9 email correspondence; and
- iv. In the event that Respondent has certified in its completed IRS Form W-9 that it has applied for a TIN and that TIN has not been issued to Respondent within thirty (30) days after the Effective Date, then Respondent, using the same email address identified in the preceding sub-paragraph, shall further:
  - a) notify EPA's Cincinnati Finance Center of this fact, via email, within thirty (30) days from the date on which the Regional Administrator signs the Final Order located at the end of this CAFO; and

- b) provide EPA's Cincinnati Finance Center with Respondent's TIN, via email, within five days of Respondent's receipt of the TIN.

18. Nothing in this document is intended or construed to waive, prejudice or otherwise affect the right of EPA, or the United States, from pursuing any appropriate remedy, sanction or penalty prescribed by law against Respondent, if Respondent has made any material misrepresentations or has provided materially false information in any document submitted to EPA during this proceeding.

19. Each party agrees to bear its own costs and attorney's fees in this matter and agrees that the parties may use electronic signature for this matter.

20. The undersigned signatory for Respondent certifies that he\she is duly and fully authorized to enter into this Consent Agreement and all the terms and conditions set forth in this Consent Agreement.

**In the Matter of Lockwood Hills LLC**  
**Docket Number RCRA-02-2025-7100**

RESPONDENT:

**Lockwood Hills LLC**

9/12/2025  
Date

<i>Dale Irwin</i>	
boxSIGN	4Z7KRJLX-4LZ9XZPJ

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Signature

  

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Dale Irwin

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Printed Name

  

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President

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Title



**In the Matter of Lockwood Hills LLC**  
**Docket Number RCRA-02-2025-7100**

**FINAL ORDER**

The Regional Judicial Officer of EPA, Region 2 concurs in the foregoing Consent Agreement in the case of **In the Matter of Lockwood Hills LLC**, bearing **Docket Number RCRA-02-2025-7100**. Said Consent Agreement, having been duly accepted and entered into by the parties, is hereby ratified, incorporated into, and issued as this Final Order, which represents a Consent Order memorializing a settlement between EPA and the Respondent. The effective date of this Order shall be the date of filing with the Regional Hearing Clerk of EPA, Region 2, New York, New York (40 C.F.R. § 22.31(b)). This Final Order is being entered pursuant to the authority of 40 C.F.R. § 22.18(b)(3) and shall constitute an order issued under Section 3008(a) of the Solid Waste Disposal Act, as amended, 42 U.S.C. § 6928(a).

DATED: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
Dana P. Friedman  
Regional Judicial Officer  
United States Environmental Protection  
Agency Region 2

**In the Matter of Lockwood Hills LLC**  
**Docket Number RCRA-02-2025-7100**

**CERTIFICATE OF SERVICE**

I certify that I have this day caused to be sent the foregoing fully executed CONSENT AGREEMENT and FINAL ORDER, bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and One Copy

By Email:

Karen Maples  
Regional Hearing Clerk  
US Environmental Protection Agency, Region 2  
290 Broadway, 17th Floor  
New York, New York 10007-1866  
Maples.Karen@epa.gov

Copy by Email:

Dale Irwin, President  
Lockwood Hills LLC  
590 Plant Road, P.O. Box 187  
Dresden, New York 14441  
[dirwin@greenidge.com](mailto:dirwin@greenidge.com)

Dated: \_\_\_\_\_

\_\_\_\_\_