



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 10 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Omar Bourassa
Technical Manager
Trademark Nitrogen Corporation
1216 Old Hopewell Road
Tampa, Florida 33619

Re: Consent Agreement and Final Order
In the Matter of: Trademark Nitrogen Corporation.
Docket No. RCRA-04-2009-4261(b)

Dear Mr. Bourassa:

Enclosed, please find a copy of the ratified Consent Agreement and Final Order (CAFO) in the above-referenced matter. The original CAFO has been filed with the Regional Hearing Clerk as directed in Section 22.05(a) of the Consolidated Rules of Practice, as amended. Please refer to Section VI (Payment of Civil Penalty), for the terms and instructions regarding Trademark Nitrogen Corporation's (Trademark's) payment on the penalty due. Any questions regarding the processing of Trademark's penalty may be directed to Ms. Lori Weidner, Financial Management Office, at (513) 487-2125.

Also, enclosed is a copy of the "Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings." This document puts Trademark on notice of Trademark's potential duty to disclose to the Securities and Exchange Commission (SEC) any environmental enforcement action taken by the Environmental Protection Agency (EPA). If you have any questions with regard to the SEC's environmental disclosure requirements, Trademark may refer to the contact phone number at the bottom of the Notice.

Should you have any questions, please contact Marlene J. Tucker at (404) 562-9536.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroline Y. F. Robinson".

Caroline Y. F. Robinson, Chief
RCRA & OPA Enforcement and Compliance
Branch

Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

IN THE MATTER OF:)	DOCKET NO.: RCRA-04-2009-4261(b)
)	
TRADEMARK NITROGEN)	
CORPORATION)	
1216 OLD HOPEWELL ROAD)	PROCEEDING UNDER SECTION
TAMPA, FLORIDA 33619)	3008(a) OF THE RESOURCE
)	CONSERVATION AND RECOVERY
)	ACT, 42 U.S.C. § 6928(a)
EPA ID NO.: FLD088780457)	
)	
RESPONDENT)	

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CONSENT AGREEMENT

I. NATURE OF THE ACTION

1. This is a civil administrative enforcement action, ordering compliance with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6921, *et seq.*, and the Florida Statutes (F. S.), Part IV Resource Recovery and Management, Section 403-702 *et seq.* (LEXIS 2006). This action is seeking the imposition of civil penalties pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), for alleged violations of RCRA and regulations promulgated pursuant thereto and set forth at Title 40 of the Code of Federal Regulations (C.F.R.), Parts 260 through 270, 273, and 279; and Sections 403-702 *et seq.*, F.S., and regulations promulgated pursuant thereto and set forth at Chapters 62-710 and 62-730 *et seq.*, Florida Administrative Code Annotated Rules (F.A.C.).
2. *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, provide that where the parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding may be simultaneously commenced and concluded by the issuance of a Consent Agreement and Final Order (CA/FO). 40 C.F.R. §§ 22.13(b) and 22.18(b)(2).
3. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to settle this action. Accordingly, before any testimony has been taken upon the pleadings and without any admission of violation by the Respondent or adjudication of any issue of fact or law, and in accordance with 40 C.F.R. § 22.13(b),

Complainant and Respondent have agreed to the execution of this CA/FO, and Respondent hereby agrees to comply with the terms of this CA/FO.

II. THE PARTIES

4. Complainant is the Chief, RCRA & OPA Enforcement and Compliance Branch, RCRA Division, Region 4, United States Environmental Protection Agency (EPA).
5. Trademark Nitrogen Corporation ("Respondent"), a corporation incorporated under the laws of the State of Florida (the State), produces nitrogen products that are used in the production of fertilizers and explosives. The business is located at 1216 Old Hopewell Road, Tampa, Florida, 33691.

III. PRELIMINARY STATEMENTS

6. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), on February 12, 1985, the State received final authorization from EPA to enforce certain portions of the State hazardous waste program in lieu of the federal program set forth in RCRA. The requirements of the authorized State program are found in § 403.702 et seq., F.S. and Chapters 62-730 et seq., F.A.C.
7. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, in January 1994 and October 2001, the State received final authorization from EPA to carry out the used oil management program in lieu of the federal program set forth in RCRA. The requirements of the authorized State's used oil management program are found in § 403.702 et seq., F.S. and Chapters 62-710 and 62-730 et seq., F.A.C.
8. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, in June 1997, the State received final authorization from EPA to carry out the universal waste management program in lieu of the federal program set forth in RCRA. The requirements of the authorized State's universal waste management program are found in § 403.702 et seq., F.S. and Chapters 62-730 et seq., F.A.C.
9. Although EPA has granted the State of Florida authority to enforce its own hazardous waste program, EPA retains jurisdiction and authority to initiate an independent enforcement action pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2). This authority is exercised by EPA in the manner set forth in the Memorandum of Agreement between EPA and the State of Florida.
10. Pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), Complainant has given notice of this action to the State of Florida before issuance of this CA/FO.
11. Pursuant to 40 C.F.R. § 261.2, as adopted by reference in Rule 62-730.020, F.A.C., a "solid waste" is any discarded material that is not otherwise excluded by regulation.

12. Pursuant to 40 C.F.R. § 261.3, as adopted by reference in Rule 62-730.020, F.A.C., a solid waste is a “hazardous waste” if it is not excluded from regulation as a hazardous waste under 40 C.F.R. § 261.4(b) and Rule 62-730.030, F.A.C., and it meets any of the criteria set out in this section.
13. Pursuant to 40 C.F.R. § 260.10, as adopted by reference in Rule 62-730.020, F.A.C., a “generator” is defined as “any person, by site, whose act or process produces hazardous waste identified or listed in part 261 of this chapter or whose act first causes a hazardous waste to become subject to regulation.”
14. Pursuant to 40 C.F.R. § 260.10, as adopted by reference in Rule 62-730.020, F.A.C., a “small quantity generator” is defined as a generator who generates less than 1,000 kilograms of hazardous waste in a calendar month.
15. Pursuant to 40 C.F.R. §§ 261.5 and 262.34(g), as adopted by reference in Rule 62-730.020, F.A.C., a “large quantity generator” is defined as a generator who generates 1,000 kilograms or greater of hazardous waste per calendar month.
16. Pursuant to 40 C.F.R. § 261.5(a), as adopted by reference in Rule 62-730.030, F.A.C., a “conditionally exempt small quantity generator” is a generator who generates no more than 100 kilograms of hazardous waste in a calendar month.
17. Section 3002(a) of RCRA, 42 U.S.C. § 6922(a), and § 403-721, *et seq.*, F.S., sets forth standards applicable to generators of hazardous waste. The implementing regulations for these requirements are found in 40 C.F.R. Part 262, as adopted by reference in Rule 62-730.160, F.A.C.
18. Pursuant to 40 C.F.R. § 262.10(b), as adopted by reference in Rule 62-730.160, F.A.C., a generator must apply 40 C.F.R. § 261.5(c) and (d), to determine the applicability of provisions of this part that are dependent on calculations of the quantity of hazardous waste generated per month.
19. Pursuant to 40 C.F.R. § 262.11, as adopted by reference in Rule 62-730.160, F.A.C., a person who generates a “solid waste” as defined in 40 C.F.R. § 261.2, must determine if that waste is a hazardous waste using the methods listed in this section.
20. Pursuant to Section 3005 of RCRA, 42 U.S.C. § 6925, a facility treating, storing, or disposing of hazardous waste must have a permit or obtain interim status. A generator of hazardous waste may accumulate hazardous waste on site for 90 days or less without a permit or without having interim status provided the generator meets the conditions for exemption specified in 40 C.F.R. § 262.34, as adopted by reference in Rule 62-730.180, F.A.C., including, but not limited to, the management of containers, tanks, drip pads or containment buildings.
21. Pursuant to 40 C.F.R. § 273.9, as adopted by reference in Rule 62-730.185, F.A.C., a

“small quantity handler of universal waste” is defined as “a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste at any time.”

22. Pursuant to 40 C.F.R. § 273.14(e), as adopted by reference in Rule 62-730.185, F.A.C., a small quantity handler of universal waste lamps must label or mark each lamp, container or package in which such lamps are contained with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).”
23. Pursuant to 40 C.F.R. § 273.13(d)(1), as adopted by reference in Rule 62-730.185, F.A.C., a small quantity handler of universal waste lamps must store any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.
24. Pursuant to 40 C.F.R. § 262.20, as adopted by reference in Rule 62-710.160, F.A.C., a generator who transports, or offers for transport a hazardous waste for offsite treatment, storage or disposal must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A.
25. Pursuant to Rule 62-730.150(2)(b), F.A.C., all generators, transporters, or persons who own or operate a facility which treats, stores, or disposes of hazardous waste, and everyone required to notify under Rule 62-730.181, F.A.C., shall notify the Florida Department of Environmental Protection (FDEP) regarding all changes in status.

IV. EPA ALLEGATIONS AND DETERMINATIONS

26. Respondent is a “person” as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and 40 C.F.R. § 260.10.
27. Respondent is the “owner” and “operator” of a “facility,” as those terms are defined in 40 C.F.R. § 260.10, that produces nitrogen products including ammonia nitrate.
28. Respondent was assigned the site specific EPA ID number FLD088780457 by FDEP.
29. On April 20, 2009, EPA and FDEP conducted a joint RCRA Compliance Evaluation Inspection (CEI) of Respondent’s facility.
30. On or about November 17, 2008, Respondent cleaned out a phosphoric acid tank which was subsequently taken out of service. As a result of this activity, Respondent generated a waste that is a “solid waste” as defined in 40 C.F.R. § 261.2.
31. Sampling results taken on December 15, 2008, revealed that the waste contained levels of cadmium that exceeded the regulatory limit of 1.0 mg/L, established in 40 C.F.R. § 261.24. A second sample taken on January 19, 2009, confirmed that the levels of cadmium were

above the regulatory limit. Therefore, the waste was hazardous and bore the designated waste code D006. As a result, EPA alleges that Respondent was a “generator” of hazardous waste as defined in 40 C.F.R. § 260.10, as adopted by reference in Rule 62-730.020, F.A.C.

32. The quantity of waste generated was approximately 90,000 pounds. Therefore, EPA alleges that Respondent was a “large quantity generator” during the time period this waste was accumulated on-site, and subject to the conditions for exemption from Section 3005 of RCRA, outlined in 40 C.F.R. § 262.34.
33. Respondent failed to submit notification to FDEP of its change in generator status from “conditionally-exempt small quantity generator” to “large quantity generator” of hazardous waste. EPA therefore alleges that Respondent violated Rule 62-730.150(2)(b), F.A.C.
34. Respondent’s waste was stored in a containment bin that did not appear to meet the requirements for a container, tank, drip pad, or containment building set forth in 40 C.F.R. Part 265, Subpart J. EPA therefore alleges that Respondent violated Section 3005 of RCRA, by failing to meet the conditions for exemption found in 40 C.F.R. § 262.34(a)(1) and Part 265, Subpart J, as adopted by reference in Rule 62-730.180, F.A.C.
35. Respondent stored the hazardous waste at its Tampa facility for longer than 90 days prior to sending the waste off-site. EPA therefore alleges that Respondent violated Section 3005 of RCRA, 42 U.S.C. § 6925, as adopted in § 403-722, et seq., F.S., for storing hazardous waste for longer than 90 days without obtaining a permit or interim status.
36. On March 16, 2009, Respondent offered for transport hazardous waste solvents (waste code D039) without preparing a proper hazardous waste manifest. EPA therefore alleges that Respondent violated 40 C.F.R. § 262.20, as adopted by reference in Rule 62-710.160, F.A.C.
37. Respondent, as a result of facility operations, is a “small quantity handler of universal waste” as defined in 40 C.F.R. § 273.9, and Rule 62-730.185, F.A.C.
38. At the time of the CEI, Respondent had not labeled universal waste lamps or containers or packages in which they were stored with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).” EPA therefore alleges the Respondent violated 40 C.F.R. § 273.14(e)(1), and Rule 62-730.185, F.A.C.
39. At the time of the CEI, Respondent was not storing universal waste lamps in closed containers that were structurally sound and adequate to prevent breakage. EPA therefore alleges the Respondent violated 40 C.F.R. § 273.13(d)(1), and Rule 62-730.185, F.A.C.

V. TERMS OF AGREEMENT

Based on the foregoing Preliminary Statements, Allegations and Determinations, the parties agree to the following:

40. For the purposes of this CA/FO, Respondent admits the jurisdictional allegations set out in the above paragraphs pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.
41. The Respondent neither admits nor denies the factual allegations and determinations set out in this CA/FO.
42. Respondent waives any right to contest the allegations and its right to appeal the proposed Final Order accompanying the Consent Agreement.
43. Respondent waives its right to challenge the validity of this CA/FO and the settlement of the matters addressed in this CA/FO based on any issue related to the Paperwork Reduction Act.
44. Respondent waives any right it may have pursuant to 40 C.F.R. § 22.8 to be present during any discussions with, or to be served with and reply to, any memorandum or communication addressed to EPA officials where the purpose of such discussion, memorandum, or communication is to persuade such official to accept and issue this CA/FO.
45. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of RCRA.
46. Respondent, by signing this CA/FO, certifies that all violations alleged in this CA/FO have been corrected.
47. Each party will pay its own costs and attorney's fees.

VI. PAYMENT OF CIVIL PENALTY

48. Respondent consents to the payment of a civil penalty in the amount of **NINE THOUSAND FIVE HUNDRED DOLLARS (\$9,500.00)** within thirty (30) calendar days of the effective date of this CA/FO.
49. Payment shall be made by cashier's check, certified check, by electronic funds transfer (EFT), or by Automated Clearhouse (ACH) (also known as REX or remittance express). If paying by check, the check shall be payable to: **Treasurer, United States of America**, and the facility name and docket number for this matter shall be referenced on the face of the check. If the Respondent sends payment by the U.S. Postal Service, the payment shall be addressed to:

United States Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

If the Respondent sends payment by non-U.S. Postal express mail delivery, the payment shall be sent to:

U.S. Bank
Government Lockbox 979077
U.S. EPA Fines & Penalties
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, Missouri 63101
(314) 418-1028

If paying by EFT, the Respondent shall transfer the payment to:

Federal Reserve Bank of New York
ABA: 021030004
Account Number: 68010727
SWIFT address: FRNYUS33
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read:
"D 68010727 Environmental Protection Agency"

If paying by ACH, the Respondent shall remit payment to:

PNC Bank
ABA: 051036706
Account Number: 310006
CTX Format Transaction Code 22 – checking
Environmental Protection Agency
808 17th Street N.W.
Washington, DC 20074
Contact: Jesse White, (301) 887-6548

50. Respondent shall submit a copy of the payment to the following addressees:

Patricia A. Bullock
Regional Hearing Clerk
U.S. EPA - Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8909

And to:

Larry Lamberth, Chief
South Section, RCRA & OPA Enforcement and Compliance Branch
RCRA Division
U.S. EPA - Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8909

51. If Respondent fails to remit the civil penalty as agreed to herein, EPA is required to assess interest and penalties on debts owed to the United States and a charge to cover the costs of processing and handling the delinquent claim. Interest, at the statutory judgment rate provided for in 31 U.S.C. § 3717, will therefore begin to accrue on the civil penalty if not paid within 30 calendar days after the effective date of this Consent Agreement. Pursuant to 31 U.S.C. § 3717, Respondent must pay the following amounts on any amount overdue:

a. Interest. Any unpaid portion of a civil penalty or stipulated penalty must bear interest at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Interest will therefore begin to accrue on a civil penalty or stipulated penalty if it is not paid by the last date required. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 4 C.F.R. § 102.13(c).

b. Monthly Handling Charge. Respondent must pay a late payment handling charge of fifteen dollars (\$15.00) on any late payment, with an additional charge of fifteen dollars (\$15.00) for each subsequent thirty (30) calendar-day period over which an unpaid balance remains.

c. Non-Payment Penalty. On any portion of a civil penalty or a stipulated penalty more than ninety (90) calendar days past due, Respondent must pay a non-payment penalty of six percent (6%) per annum, which will accrue from the date the penalty payment became due and is not paid. This non-payment is in addition to charges which accrue or may accrue under subparagraphs (a) and (b).

52. Penalties paid pursuant to this CA/FO are not deductible for federal purposes under 28 U.S.C. § 162(f).

VII. PARTIES BOUND

53. This CA/FO shall be binding on Respondent and its successors and assigns. Respondent shall cause its officers, directors, employees, agents, and all persons, including independent contractors, contractors, and consultants acting under or for Respondent, to comply with the provisions hereof in connection with any activity subject to this CA/FO.
54. No change in ownership, partnership, corporate or legal status relating to the facility will in any way alter Respondent's obligations and responsibilities under this CA/FO.
55. The undersigned representative of Respondent hereby certifies that she or he is fully authorized to enter into this CA/FO and to execute and legally bind Respondent to it.

VIII. RESERVATION OF RIGHTS

56. Notwithstanding any other provision of this CA/FO, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority, should the EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at Respondent's facility may present an imminent and substantial endangerment to human health or the environment.
57. Complainant reserves the right to take enforcement action against Respondent for any future violations of RCRA and the implementing regulations and to enforce the terms and conditions of this CA/FO.
58. Except as expressly provided herein, nothing in this CA/FO shall constitute or be construed as a release from any civil or criminal claim, cause of action, or demand in law or equity for any liability Respondent may have arising out of, or relating in any way to, the transportation, release, or disposal of any hazardous constituents, hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken from Respondent's facility.
59. This CA/FO may be amended or modified only by written agreement executed by both the EPA and Respondent.

IX. SERVICE OF DOCUMENTS

60. A copy of any documents that Respondent files in this action shall be sent to the following attorney who represents EPA in this matter and who is authorized to receive service for EPA in the proceeding:

Marlene Tucker
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8909
(404) 562-9536

61. A copy of any documents that Complainant files in this action shall be sent to the following attorney who represents Respondent in this matter and who is authorized to receive service for Respondent in the proceedings:

Omar Bourassa
Technical Manager
Trademark Nitrogen Corporation
1216 Old Hopewell Road
Tampa, Florida 33619
(813) 626-1181

X. SEVERABILITY


62. It is the intent of the parties that the provisions of this CA/FO are severable. If any provision or authority of this CA/FO or the application of this CA/FO to any party or circumstances is held by any judicial or administrative authority to be invalid or unenforceable, the application of such provisions to other parties or circumstances and the remainder of the CA/FO shall remain in force and shall not be affected thereby.

XI. EFFECTIVE DATE

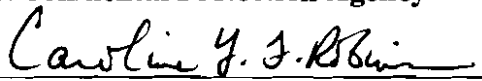
63. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

AGREED AND CONSENTED TO:

Trademark Nitrogen Corporation

By:  Dated: 11/18/2009
Omar Bourassa
Technical Manager

U.S. Environmental Protection Agency

By:  Dated: 12/1/09
Caroline Y. F. Robinson, Chief
RCRA and OPA Enforcement and Compliance Branch
RCRA Division

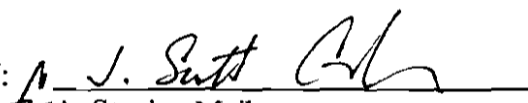
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:)	DOCKET NO.: RCRA-04-2009-4261(b)
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TRADEMARK NITROGEN CORP.)	
1216 OLD HOPEWELL ROAD)	PROCEEDING UNDER SECTION
TAMPA, FLORIDA 33619)	3008(a) OF THE RESOURCE
)	CONSERVATION AND RECOVERY
)	ACT, 42 U.S.C. § 6928(a)
)	
EPA ID NO.: FLD088780457)	
)	
RESPONDENT)	
_____)	

FINAL ORDER

The foregoing Consent Agreement is hereby approved, ratified and incorporated by reference into this Final Order in accordance with 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. The Respondent is hereby ORDERED to comply with all of the terms of the foregoing Consent Agreement effective immediately upon filing of this Consent Agreement and Final Order with the Regional Hearing Clerk. This Order disposes of this matter pursuant to 40 C.F.R. §§ 22.18 and 22.31.

BEING AGREED, IT IS SO ORDERED this 8TH day of December, 2009.

BY: 
A. Stanley Meiburg
Acting Regional Administrator

CERTIFICATE OF SERVICE

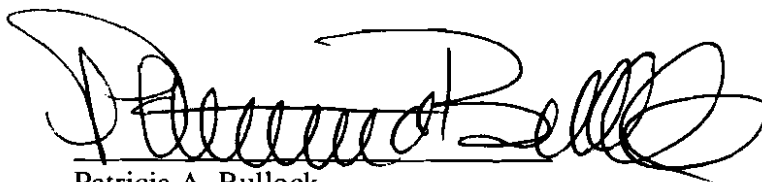
I hereby certify that I have this day filed the original and a true and correct copy of the foregoing Consent Agreement and the attached Final Order (CA/FO), in the Matter of Trademark Nitrogen Corporation. Docket Number: RCRA-04-2009-4261(b), on DEC 10 2009 2009, and on ~~DEC 10 2009~~ 2009, served the parties listed below in the manner indicated:

Marlene J. Tucker (Via EPA's internal mail)
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8909
(404) 562-9536

Omar Bourassa (Via Certified Mail - Return Receipt Requested)
Technical Manager
Trademark Nitrogen Corporation
1216 Old Hopewell Road
Tampa, Florida 33619
(813) 626-1181

Quantindra Smith
Environmental Protection Specialist
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8909
(404) 562-8564

Date: 12-10-09



Patricia A. Bullock
Regional Hearing Clerk
U.S. EPA - Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303
(404) 562-9511