

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

Chem-Solv, Inc. Formerly trading as Chemicals and Solvents, Inc., and Austin Holdings, VA, L.L.C.,

RCRA-03-2011-0068

Complainant's Initial Post-Hearing Brief

This is a large document. Please call the Regional Hearing Clerk for a copy.

Lydia Guy Regional Hearing Clerk

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

A.J. D'Angelo (3RC30)
Sr. Assistant Regional Counsel

Direct dial: (215) 814-2480 Facsimile: (215) 814-2603

Via UPS Next Day Air

Honorable Susan L. Biro Chief Administrative Law Judge Office of Administrative Law Judges U.S. Environmental Protection Agency 1099 14th Street, N.W. Franklin Court, Suite 350 Washington, D.C. 20005 June 29, 2012

Re:

In the Matter of: Chem-Solv, Inc. and Austin Holdings-VA, L.L.C.

U.S. EPA Docket No. RCRA-03-2011-0068 Complainant's Initial Posthearing Brief

Dear Judge Biro:

Pursuant to 40 C.F.R. § 22.26 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits and the schedule set forth in this Court's June 12, 2012 Order on Motion to Modify Briefing Schedule, Complainant, the Division Director of the Land and Chemicals Division, United States Environmental Protection Agency, Region III ("EPA" or the "Agency"), respectfully submits to the Court a copy of Complainant's Initial Post-Hearing Brief in the above-captioned matter.

The original and one copy of *Complainant's Initial Post-Hearing Brief* was filed today with the U.S. Environmental Protection Agency, Region III, Regional Hearing Clerk and an additional copy has been served today upon Respondents' counsel in the manner set forth in the attached Certificate of Service.

Sincerely,

A.J. D'A

Sr. Assistant Regional Counsel

Enclosure

cc:

Ms. Lydia Guy (3RC00)
(via Hand Delivery)

Charles L. Williams, Esq. (via UPS Next Day Air)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

In the Matter of:	1 (1 (
Chem-Solv, Inc., formerly trading as)
Chemicals and Solvents, Inc.)
and) Docket No. RCRA-03-2011-0068
Austin Holdings-VA, L.L.C.	
Respondents.))

COMPLAINANT'S

INITIAL POST-HEARING BRIEF