



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
FOUR PENN CENTER – 1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PENNSYLVANIA 19103

FILED
Sep 19, 2023
2:34 pm
U.S. EPA REGION III
HEARING CLERK

In the Matter of: :
 :
Winchester 101, LLC d/b/a : **U.S. EPA Docket No. RCRA-03-2023-0111**
Route 50 Gas Mart : :
4780 Northwestern Pike : **Proceeding under Section 9006 of the Resource**
Winchester, VA 22603 : **Conservation and Recovery Act, 42 U.S.C.**
 : **Section 6991e**
Respondent. : :
 : :
Route 50 Gas Mart : :
4780 Northwestern Pike : :
Winchester, VA 22603 : :
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 III (“Complainant”) and Winchester 101, LLC d/b/a Route 50 Gas Mart (“Respondent”) (collectively the “Parties”), pursuant to Section 9006 of the Solid Waste Disposal Act, commonly referred to as the Resource Conservation and Recovery Act, (“RCRA”), 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 (“CA”). The Administrator has delegated this authority to the Regional Administrator who, in turn, has delegated it 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 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 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.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

12. 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.

13. Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d), authorizes EPA to assess civil penalties against any owner or operator of an underground storage tank (“UST”) who fails to comply with, *inter alia*, 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.
14. 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. 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 § 25-580-10 *et seq.*¹
15. At all times relevant to the alleged violations in this Consent Agreement and Final Order, Respondent has been a Virginia corporation.
16. 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.
17. 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 underground storage tanks (“USTs”) and “UST systems” as those terms are defined in Section 9001(10) of RCRA, 42 U.S.C. § 6991(10), and 9 VAC § 25-580-10, at Route 50 Gas Mart facility located at 4870 Northwestern Pike, Winchester, VA 22603 (“the Facility”).
18. On May 18, 2021, under the authority of Section 9005(a) of RCRA, 42 U.S.C. § 6991d(a), an EPA inspector conducted an inspection at the Facility.
19. At the time of the May 18, 2021 inspection, and at all times relevant to the applicable violations alleged herein, eight (8) 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:

¹ Effective May 3, 2021, EPA approved revisions to the Commonwealth of Virginia’s Underground Storage Tank (UST) program. Since the alleged violations of this Consent Agreement and Final Order occurred during a period of time that straddles May 3, 2021, these newly approved revisions apply to part of the alleged violations in this Agreement.

<u>Registered Tank ID</u>	<u>Owner Tank ID</u>	<u>Material Stored</u>	<u>Capacity (gal.)</u>	<u>Installation Date</u>	<u>Tank Construction Material</u>	<u>Piping Construction Material</u>
1	4	Premium Gasoline	8,000	11/28/1988	Cathodically Protected Steel (STI-P3)	Polyflexible Plastic Piping
2M	2	Regular Gasoline	8,000	11/28/1988	Cathodically Protected Steel (STI-P3)	N/A (manifolded tank)
3M	1	Regular Gasoline	8,000	11/28/1988	Cathodically Protected Steel (STI-P3)	Polyflexible Plastic Piping (manifolded master tank)
5MA	5	On-Road Diesel	10,000	08/01/1997	Cathodically Protected Steel (STI-P3)	N/A (manifolded tank)
6	8	Kerosene	10,000	05/20/2004	Composite	Polyflexible Plastic Piping (manifolded master tank)
7M	3	Regular Gasoline	8,000	05/20/2004	Composite	N/A (manifolded tank)
8C	7	Off-Road Diesel	10,000	05/20/2004	Composite	Polyflexible Plastic Piping (manifolded master tank)
9CMA	6	On-Road Diesel	5,000	05/20/2004	Composite	Polyflexible Plastic Piping (manifolded master tank)

20. At all times relevant to the alleged violations in this Consent Agreement and Final Order, USTs 5MA, 6, 7M, 8C, and 9CMA are new tank systems, as defined in 9 VAC 25-580-10, which states that an “new tank system” means a tank system used to contain an accumulation of regulated substances or for which installation has commenced after December 22, 1988.
21. At all times relevant to the alleged violations in this Consent Agreement and Final Order, USTs 1, 2M, and 3M are existing tank systems, as defined in 9 VAC 25-580-10, which states that an “existing tank system” means a tank system used to contain an accumulation of regulated substances or for which installation has commenced on or before December 22, 1988.
22. All of the USTs at the Facility utilize polyflexible plastic piping that routinely contained regulated substances conveyed using a pressurized pumping system.

23. All of the USTs at the Facility used a Gilbarco EMC ATG system console set to perform continuous automatic tank gauging monitoring (“ATG system”) to detect leaks.
24. At all times relevant to the alleged violations in this Consent Agreement and Final Order, all of the USTs at the Facility and the respective underground piping associated with each UST, was a “petroleum UST system” as these terms are defined in 9 VAC § 25-580-10.

COUNT I

(Failure to test cathodic protection system on USTs Nos. 1, 2M, 3M, and 5MA)

25. Paragraphs 1 through 24 of this CA are incorporated by reference as if fully set forth herein.
26. 9 VAC § 25-580-90.2.a. provides that all UST systems equipped with cathodic protection system must be tested for proper operation within 6 months of installation and at least every 3 years thereafter by a qualified cathodic protection tester.
27. USTs Nos. 1, 2M, 3M, and 5MA at the Facility are and were, at the time of the violations alleged herein, metal UST systems with corrosion protection and routinely contained regulated substances within the meaning of 9 VAC § 25-580-90.
28. Respondent performed cathodic protection system testing for USTs 1, 2M, 3M, and 5MA at the Facility on April 3, 2017 and again on June 8, 2021.
29. From at least April 3, 2020 until June 7, 2021, Respondent failed to conduct a test of the cathodic protection system for USTs Nos. 1, 2M, 3M, and 5MA at the Facility.
30. Respondent violated 9 VAC § 25-580-90.2.a by failing to conduct a test of the cathodic protection system every 3 years for USTs Nos. 1, 2M, 3M, and 5MA at the Facility.
31. In failing to comply with 9 VAC § 25-580-90.2.a, Respondent is in violation of 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 II

(Failure to Operate and Maintain Corrosion Protections System Continuously)

32. The allegations in Paragraphs 1 through 31 of this CA, above, are incorporated herein by reference
33. 9 VAC § 25-580-90.1 provides, in pertinent part, that owners and operators of petroleum UST systems must ensure that all corrosion protection systems must be operated and maintained to continuously provide corrosion protection to the metal components of that portion of the tank and piping that routinely contain regulated substances and are in

contact with the ground.

34. USTs Nos. 2M, and 3M and their associated piping at the Facility, at the time of the violations alleged herein, had metal components which routinely contained regulated substances and were in contact with the ground.
35. The corrosion protection systems (“CP systems”) for USTs 2M and 3M at the Facility failed the functionality testing on June 8, 2021. On September 16, 2022, the CP systems for USTs Nos. 2M and 3M achieved a passing result.
36. From June 8, 2021 until September 15, 2022, Respondent failed to maintain continuous corrosion protection for USTs Nos. 2M, and 3M and their associated piping at the Facility.
37. Respondent violated 9 VAC § 25-580-90.1 by failing to maintain continuous corrosion protection for USTs Nos. 2M, and 3M and their associated piping at the Facility.
38. In failing to comply with 9 VAC § 25-580-90.1, Respondent is in violation of 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

39. In settlement of 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 **Twenty-Nine Thousand dollars (\$29,000.00)**, which Respondent shall be liable to pay in accordance with the terms set forth below.
40. The civil penalty is based upon EPA’s consideration of a number of factors, including the penalty criteria (“statutory factors”) set forth in Sections 9006 (c) and (e) of RCRA, 42 U.S.C. §§ 6991e(c) and (e), which includes the seriousness of the violation, any good faith efforts to comply with the applicable requirements, the compliance history of the owner or operator and any other factors considered appropriate. In developing a proposed penalty for the violations alleged in this Consent Agreement, EPA will take into account the particular facts and circumstances of this case with specific reference to EPA’s November 1990 U.S. E.P.A. Penalty Guidance for Violations of UST Regulations (“UST Penalty Policy”), the 2018 Interim Consolidated Enforcement Penalty Policy for Underground Storage Tank Regulations (“Enforcement Penalty Policy”) (collectively the “UST Penalty Policies), the appropriate *Adjustment of Civil Monetary Penalties for Inflation*, pursuant to 40 C.F.R. Part 19, and the applicable EPA memoranda addressing EPA’s civil penalty policies to account for inflation.
41. Payment of the civil penalty amount, and any associated interest, administrative fees, and late payment penalties owed, shall be made by either cashier’s check, certified check or electronic wire transfer, in the following manner:

- a. All payments by Respondent shall include reference to Respondent's name and address, and the Docket Number of this action, *i.e.*, EPA Docket Number RCRA-03-2023-0111;
- b. All checks shall be made payable to the "United States Treasury";
- c. All payments made by check and sent by regular mail shall be addressed and mailed to:

U.S. Environmental Protection Agency
Cincinnati Finance Center
P.O. Box 979078
St. Louis, MO 63197-9000

- d. For additional information concerning other acceptable methods of payment of the civil penalty amount see:

<https://www.epa.gov/financial/makepayment>

- e. A copy of Respondent's check or other documentation of payment of the penalty using the method selected by Respondent for payment shall be sent simultaneously by email to:

Jeffrey S. Nast
Sr. Assistant Regional Counsel
nast.jeffrey@epa.gov

and

U.S. EPA Region III Regional Hearing Clerk
R3_Hearing_Clerk@epa.gov

42. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, EPA is entitled to assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim, as more fully described below. Accordingly, Respondent's failure to make timely payment of the penalty as specified herein shall result in the assessment of late payment charges including interest, penalties and/or administrative costs of handling delinquent debts.
43. Payment of the civil penalty, in accordance with the above terms and provisions, 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 EPA by Respondent in accordance with 40 C.F.R. § 13.9(a).

44. **INTEREST:** In accordance with 40 C.F.R § 13.11(a)(1), interest on the civil penalty assessed in this Consent Agreement and Final Order will begin to accrue on the date that a copy of the fully executed and filed Consent Agreement and Final Order is mailed or hand-delivered to Respondent. However, EPA will not seek to recover interest on any amount of the civil penalties that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R § 13.11(a).
45. **ADMINISTRATIVE COSTS:** The costs of the EPA’s administrative handling of overdue debts will be charged and assessed monthly throughout the period a debt is overdue. 40 C.F.R. § 13.11(b). If payment is not received within 30 calendar days of the effective date of this CA, EPA will also assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid.
46. **LATE PAYMENT PENALTY:** A late payment penalty of six percent per year will be assessed monthly on any portion of the civil penalty that remains delinquent more than ninety (90) calendar days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d).
47. Respondent agrees not to deduct for federal tax purposes the civil penalty assessed in this Consent Agreement and Final Order.
48. The parties consent to service of the Final Order by e-mail at the following valid e-mail address: nast.jeffrey@epa.gov (for Complainant), and tpurnell@manassasalawyers.com (for Respondent).

GENERAL SETTLEMENT CONDITIONS

49. 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.
50. Respondent certifies that any information or representation it has supplied or made to EPA concerning this matter, including information on ability to pay, 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. EPA shall have the right to institute further actions to recover appropriate relief if 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 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.

CERTIFICATION OF COMPLIANCE

51. Respondent certifies to 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

52. 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 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

53. This Consent Agreement and Final Order resolves only EPA's claims for civil penalties for the specific violation[s] alleged against Respondent in this Consent Agreement and Final Order. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which 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). 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

54. 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 his or her signature below, the person who signs this Consent Agreement on behalf of Respondent is acknowledging that he or she 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

55. The effective date of this Consent Agreement and Final Order is the date on which the Final Order, signed by the Regional Administrator of EPA, Region III, or his/her 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

56. 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:

Winchester 101, LLC d/b/a Route 50 Gas Mart

Date: 8/28/2023

By: 
Prakash Patel, Managing Member

For the Complainant:

After reviewing the Consent Agreement and other pertinent matters, I, the undersigned Director of the Enforcement and Compliance Assurance Division of the United States Environmental Protection Agency, Region III, agree to the terms and conditions of this Consent Agreement and recommend that the Regional Administrator, or his/her designee, the Regional Judicial Officer, issue the attached Final Order.

Date: _____

By: _____

[Digital Signature and Date]

Karen Melvin, Director
Enforcement and Compliance Assurance Division
U.S. EPA – Region III
Complainant

Attorney for Complainant:

Date: _____

By: _____

[Digital Signature and Date]

Jeffrey S. Nast
Sr. Assistant Regional Counsel
U.S. EPA – Region III



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
FOUR PENN CENTER – 1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PENNSYLVANIA 19103**

FILED
Sep 19, 2023
2:34 pm
U.S. EPA REGION III
HEARING CLERK

In the Matter of:	:	
	:	
Winchester 101, LLC d/b/a	:	U.S. EPA Docket No. RCRA-03-2023-0111
Route 50 Gas Mart	:	
4780 Northwestern Pike	:	Proceeding under Section 9006 of the Resource
Winchester, VA 22603	:	Conservation and Recovery Act, 42 U.S.C.
	:	Section 6991e
Respondent.	:	
	:	
Route 50 Gas Mart	:	
4780 Northwestern Pike	:	
Winchester, VA 22603	:	
	:	
Facility.	:	
	:	

FINAL ORDER

Complainant, the Director of the Enforcement & Compliance Assurance Division, U.S. Environmental Protection Agency, Region III, and Respondent, Winchester 101, LLC doing business as Route 50 Gas Mart 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)). 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.

Based upon the representations of the parties in the attached Consent Agreement, the penalty agreed to therein is based upon consideration of, *inter alia*, EPA’s November 1990 U.S. E.P.A. Penalty Guidance for Violations of UST Regulations (“UST Penalty Policy”), and the 2018 Interim Consolidated Enforcement Penalty Policy for Underground Storage Tank Regulations (“Enforcement Penalty Policy”) (collectively the “UST Penalty Policies) which reflects the statutory penalty criteria and factors set forth Section 9006(c) of the Resource Conservation and Recovery Act (“RCRA”), and the appropriate *Adjustment of Civil Monetary Penalties for Inflation*, pursuant to 40 C.F.R. Part 19, and the applicable EPA memoranda addressing EPA’s civil penalty policies to account for inflation.

NOW, THEREFORE, PURSUANT TO Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d), 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 **TWENTY-NINE THOUSAND DOLLARS (\$29,000.00)**, 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 attached Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

Date: _____

By: _____

[Digital Signature and Date]

Joseph J. Lisa

Regional Judicial and Presiding Officer

U.S. EPA Region III

Jeffrey S. Nast
Senior Assistant Regional Counsel
U.S. EPA, Region III
nast.jeffrey@epa.gov

Andrew Ma
RCRA Branch, Enforcement and Compliance Assurance Division
U.S. EPA, Region III
ma.andrew@epa.gov

[Digital Signature and Date]
Bevin Esposito
Regional Hearing Clerk
U.S. EPA, Region III