

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
DALLAS, TEXAS

REGIONAL HEARING CLERK  
EPA REGION 6

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In the Matter of	§	
	§	
Reworld Advanced Processing, Inc.	§	Docket No. RCRA-06-2025-0916
La Porte, Texas	§	
	§	
Respondent.	§	

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**CONSENT AGREEMENT AND FINAL ORDER**

**I. PRELIMINARY STATEMENT**

1. This is an administrative action commenced and concluded under Section 3008(a) of the Resource Conservation and Recovery Act (“RCRA” or the “Act”), 42 U.S.C. § 6928(a), and Sections 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (“Consolidated Rules”) as codified at 40 C.F.R. Part 22.

2. The Administrator of the U.S. Environmental Protection Agency has delegated enforcement authority under Section 3008 of RCRA, 42 U.S.C. § 6928, to the Regional Administrator of EPA Region 6, who in turn has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, EPA Region 6 (“EPA” or “Complainant”).

3. Circon Environmental 225 Plant, formerly Intergulf Corporation, is owned by Reworld Advanced Processing, Inc., a corporation doing business in the State of Texas (“Respondent”).

4. Notice of this action has been given to the State of Texas, under Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

5. Complainant and Respondent, having agreed that settlement of this action is in the public interest, consent to the entry of this Consent Agreement along with the corresponding Final Order hereinafter known together as the “CAFO” without the adjudication of any issues of law or fact herein. Respondent neither admits nor denies the specific factual allegations and legal conclusions contained in this CAFO.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO and to the terms of this CAFO.

## **II. JURISDICTION**

7. This CAFO is entered into under Section 3008(a) of RCRA, as amended, 42 U.S.C. § 6928(a), and 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3).

8. Jurisdiction for this action is conferred upon EPA by Sections 3006 and 3008 of RCRA, 42 U.S.C. §§ 6926 and 6928.

9. The Regional Judicial Officer is authorized to ratify this CAFO which memorializes a settlement between Complainant and Respondent. 40 C.F.R. §§ 22.4(b) and 22.18(b).

10. The issuance of this CAFO simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).

## **III. STATUTORY AND REGULATORY BACKGROUND**

11. Federal regulation of hazardous waste is primarily based on RCRA, enacted on October 21, 1976, to amend the Solid Waste Disposal Act (“SWDA”), and the Hazardous and Solid Waste Amendments (“HSWA”) enacted by Congress in 1984 to further amend SWDA. RCRA

establishes a “cradle-to-grave” program to be administered by the Administrator of EPA and authorized states for regulating the generation, transportation, treatment, storage, and disposal of hazardous waste. *See* 42 U.S.C. § 6901 *et seq.*

12. RCRA’s Subchapter III (RCRA §§ 3001-3023, 42 U.S.C. §§ 6921-6940, known as “Subtitle C”) required EPA to promulgate regulations establishing performance standards applicable to facilities that generate, transport, treat, store, or dispose of hazardous wastes. Together, RCRA Subtitle C and its implementing regulations, set forth at 40 C.F.R. Parts 260 – 279, comprise EPA’s RCRA hazardous waste program.

13. 40 C.F.R. Parts 260 through 279, govern generators and transporters of hazardous waste and facilities that treat, store, and dispose of hazardous waste, pursuant to Sections 3002, 3003, and 3004 of RCRA, 42 U.S.C. §§ 6922, 6923, and 6924. These regulations prohibit land disposal of certain hazardous wastes and provide detailed requirements governing the activities of those who generate hazardous waste and those who are lawfully permitted to store, treat, and dispose of hazardous waste.

14. Section 3005(a) of RCRA, 42 U.S.C. § 6925(a), directed EPA to promulgate regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to have a RCRA permit; this section of RCRA further provides in relevant part that the treatment, storage, or disposal of hazardous waste is prohibited except in accordance with a RCRA permit.

15. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of EPA may authorize a state to administer its own hazardous waste program in lieu of the federal program when the Administrator deems the state program to be equivalent to and consistent with the

federal program. Any violation of regulations promulgated pursuant to Subtitle C (Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6939e) or any state provision authorized pursuant to Section 3006 of RCRA, constitutes a violation of RCRA, subject to the assessment of civil penalties<sup>1</sup> and issuance of compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

16. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), EPA granted the State of Texas final authorization to administer a state hazardous waste program in lieu of the federal RCRA program.<sup>2</sup>

17. Pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), EPA may enforce the federally approved State of Texas' hazardous waste program. EPA also 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).

18. The Texas Commission on Environmental Quality ("TCEQ") codified the applicable RCRA authorized program at Texas Administrative Code ("Tex. Admin. Code"), Title 30, Chapter 335 [40 C.F.R. Part 262, 265, and/or 270].

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<sup>1</sup> The Administrator may assess an inflation-adjusted civil penalty per day for each violation of Subtitle C of RCRA pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), and 40 C.F.R. § 19.4.

<sup>2</sup> On December 26, 1984, the State of Texas received final authorization for its base Hazardous Waste Management Program (49 Fed. Reg. 48300). Subsequent revisions have been made to the Texas Hazardous Waste Program and authorized by EPA. Except as otherwise provided, all citations found within this CAFO are to the "EPA-Approved Texas Statutory and Regulatory Requirements Applicable to the Hazardous Waste Management Program" dated December 2015, incorporated by reference under 40 C.F.R. § 272.2201(c)(1)(i) effective on April 10, 2020. (85 Fed. Reg. 20187, 20190; 40 C.F.R. § 272.2201: Texas State-Administered Program: Final Authorization). References and citations to the "EPA-Approved Texas Statutory and Regulatory Requirements Applicable to the Hazardous Waste Management Program" may vary slightly from the State of Texas's published version. For ease of reference, the corresponding C.F.R. citations will follow in brackets.

## Definitions

19. 30 Tex. Admin. Code § 335.1(138), [40 C.F.R. § 261.2], defines a "solid waste" as any discarded material that is not otherwise excluded under § 335.1(138)(A)(i-iv), [40 C.F.R. § 261.4(a)], or that is not excluded by variance.

20. 30 Tex. Admin. Code § 335.1(69) defines a "hazardous waste" as any waste identified or listed as hazardous waste by the Administrator of EPA in accordance with the federal SWDA, as amended by RCRA, 42 U.S.C. §§ 6901 *et seq.* EPA defines a "hazardous waste" as a solid waste that is not excluded from regulation, and it exhibits any of the characteristics of hazardous waste identified in 40 C.F.R. Part 261, Subpart C, or it is listed in Part 261, Subpart D, [40 C.F.R. § 261.3].

21. Characteristic hazardous wastes are assigned "D" codes in 40 C.F.R. Part 261, Subpart C, depending on the specific hazardous characteristic that the waste exhibits.

22. An ignitable hazardous waste has a flash point of less than 60 degrees centigrade (140 degrees Fahrenheit) and is assigned the D001 hazardous waste code pursuant to 40 C.F.R. § 261.21.

23. A corrosive hazardous waste has a pH of less than or equal to 2.0 or greater than or equal to 12.5 and is assigned the D002 hazardous waste code pursuant to 40 C.F.R. § 261.22, and a reactive hazardous waste is assigned the D003 hazardous waste code pursuant to 40 C.F.R. § 261.23.

24. Listed wastes are assigned with "F", "K", and "U" codes in 40 C.F.R. Part 261, Subpart D, depending on the specific waste generated from a non-specific source, a specific

source, or discarded commercial chemical products, off-specification species, container residues and spill residues therefrom.

25. Pursuant to 30 Tex. Admin. Code § 335.1(65), [40 C.F.R. § 260.10], a generator is any person whose act first causes a hazardous waste to become subject to regulation.

26. 30 Tex. Admin. Code § 335.112, [40 C.F.R. Parts 264 and/or 265] applies to owners and operators of facilities that treat, store and/or dispose of hazardous waste.

#### **IV. FINDINGS OF FACT AND CONCLUSIONS OF LAW**

27. Respondent owns and operates a facility, Circon Environmental-225 plant, located at 9400 Strang Rd La Porte, TX 77571 (the "Facility"). The Facility is a large quantity generator facility for hazardous waste generated primarily by tank and bundle cleaning from refineries. 30 Tex. Admin. Code § 3.2(25), [40 C.F.R. § 260.10].

28. Respondent is a "person" within the meaning of Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), 30 Tex. Admin. Code § 3.2(25), [40 C.F.R. § 260.10].

29. The Facility is a "facility" within the meaning of 30 Tex. Admin. Code § 335.1(59), [40 C.F.R. § 260.10].

30. On March 13, 2024, EPA conducted a Compliance Evaluation Inspection and RCRA record review of the Facility's activities as a generator of hazardous waste (the "Inspection").

31. EPA discovered that Respondent generated, and offered for transport and treatment, hazardous waste described by the following waste codes:

- a. D001: Characteristic of Ignitability (Ignitability)
- b. D002: Characteristic of Corrosive (Corrosivity)
- c. D009, D018, D022, D028, D035: Characteristic of Toxic (Toxicity)

d. F003, F005, F037, K050, U112: Listed Waste

32. The waste streams identified above are "hazardous waste" as defined in 30 Tex. Admin. Code § 335.1(69), [40 C.F.R. § 261.21].

33. Based on its review, EPA determined that Respondent generated the hazardous waste above in quantities that exceeded the threshold amount of 100 kilograms of hazardous waste and operated as a Large Quantity Generator (LQG) in a calendar month under 30 Tex. Admin. Code, Chapter 335, Subchapter C, [40 C.F.R. Part 262], for the periods that such wastes remained onsite.

34. Respondent is a "generator" of "hazardous waste" as those terms are defined in 30 Tex. Admin. Code §§ 335.1(65) and (69), [40 C.F.R. § 260.10].

35. As a generator of hazardous waste, Respondent is subject to Sections 3002 and 3010 of RCRA, 42 U.S.C. §§ 6922 and 6930, and the regulations set forth in Tex. Admin. Code Chapter 335, Subchapters C and F, [40 C.F.R. Part 262, 265, and/or 270].

## **V. ALLEGED VIOLATIONS**

36. The facts stated in the EPA Findings of Fact and Conclusions of Law above are herein incorporated.

37. Complainant hereby states and alleges that Respondent has violated RCRA and federal and state regulations promulgated thereunder, as stated below.

### **Count 1. Failure to Mark or Label Containers of Hazardous Waste**

38. Pursuant to 30 TAC § 335.53(f) [40 C.F.R. § 262.17(a)(5)(i)] a large quantity generator must mark or label its containers with the words "Hazardous Waste"; an indication of

the hazardous of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

39. During the Inspection, three roll-off containers of hazardous waste centrifuge solids were observed and determined to be unlabeled.

40. While operating the Facility as a large quantity generator of hazardous waste, Respondent failed to properly mark and label its hazardous waste containers in violation of 30 Tex. Admin. Code § 335.53(f), [40 C.F.R. § 262.17(a)(5)(i)].

**Count 2. Failure to Maintain Release of Hazardous Waste**

41. Under 30 Tex. Admin. Code § 335.61(5) [40 C.F.R. § 262.251], a large quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment

42. During the Inspection, the EPA inspectors observed evidence of spills and staining of listed waste on the ground in the area of the Facility where waste is transferred from roll-off containers into dry bulk trailers.

43. For all time relevant to this CAFO, Respondent failed to maintain and operate its facility in a manner to minimize the release of hazardous waste in violation of 30 Tex. Admin. Code § 335.61(5), [40 C.F.R. § 262.251].

**Count 3. Failure to Implement Contingency Plan and Maintain Recordkeeping of  
Emergency Procedures - 40 C.F.R. § 265, Subpart D**

*a. Failure to Implement Contingency Plan*



44. Under 30 Tex. Admin. Code § 335.112 [40 C.F.R. § 265.51(b)], the provisions of a contingency plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

45. During the inspection, evidence of spills and staining of listed waste were visible on the ground in the area where waste is transferred from roll-off containers into dry bulk trailers.

46. EPA reviewed Respondent's records for the Contingency Plan and determined that Respondent exceeded the reportable quantity for a spill but did not implement the plan.

48. While operating the Facility as a large quantity generator of hazardous waste, the Respondent failed to implement the provisions of its contingency plan in violations of 30 Tex. Admin. Code § 335.112 [40 C.F.R. § 265.51(b)].

*b. Failure to Maintain Recordkeeping for Emergency Procedures*

47. Under 30 Tex. Admin. Code § 335.112, [40 C.F.R. § 265.56(i)], the provisions of the contingency plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

48. During the Inspection, evidence of spills and staining of listed waste were visible on the ground in the area where waste is transferred from roll-off containers into dry bulk trailers.

49. EPA reviewed Respondent's records for the Contingency Plan and determined that Respondent exceeded the reportable quantity for a spill of F-Listed waste (F037) but did not implement the plan.

50. While operating the Facility as a large quantity generator of hazardous waste, the Respondent failed to implement the provisions of its contingency plan in violation of 30 Tex. Admin. Code §335.112 [40 C.F.R. §265.56(i)].

## **CONSENT AGREEMENT AND CIVIL PENALTY**

### **General**

51. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:

- a. admits the jurisdictional allegations set forth herein;
- b. neither admits nor denies the specific factual allegations and legal conclusions stated herein;
- c. consents to the assessment of a civil penalty, as stated herein;
- d. consents to the issuance of any specified compliance or corrective action order;
- e. consents to any conditions specified herein;
- f. consents to any stated Permit Action;
- g. waives any right to contest the allegations set forth herein; and
- h. waives its rights to appeal the Final Order accompanying this CAFO.

52. By signing this CAFO, 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 this CAFO.

53. Respondent consents to the issuance of this CAFO and consents for the purposes of settlement to the payment of the civil penalty specified herein.

54. Respondent and EPA agree to conciliate this matter without the necessity of a formal hearing and to bear their respective costs and attorneys' fees.

### **Penalty Assessment and Collection**

55. Pursuant to the authority granted in Section 3008 of RCRA, 42 U.S.C. § 6928, and upon consideration of the entire record herein, including the above referenced Findings of Fact and Conclusions of Law, which are hereby adopted and made a part hereof, upon the seriousness of the alleged violations, and Respondent's good faith efforts to comply with the applicable regulations, it is ordered that Respondent be assessed a civil penalty of \$ 33,445.00 (the "EPA Penalty").

56. Respondent agrees to pay the EPA Penalty within thirty (30) days after the Effective Date of this CAFO.

57. Respondent shall pay the EPA 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>.

58. When making a payment, Respondent shall:

a. Identify every payment with Respondent's name and the docket number of this Agreement, Docket No. RCRA-06-2025-0916.

b. Concurrently with any payment or within 24 hours of any payment, Respondent shall serve proof of such payment to the following person(s):

Elizabeth Pham  
U.S. EPA Region 6  
Pham.elizabeth@epa.gov

Region 6 Hearing Clerk  
U.S. EPA Region 6  
Vaughn.Lorena@epa.gov

and

U.S. Environmental Protection Agency  
Cincinnati Finance Center  
Via electronic mail to:  
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.

59. 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 EPA Penalty per this CAFO, EPA is authorized to recover, in addition to the amount of the unpaid EPA Penalty, the following amounts.

a. Interest. Interest begins to accrue from the Filing Date. If the EPA Penalty is paid in full within thirty (30) days, interest accrued is waived. If the EPA Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the EPA 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.

b. 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 EPA Penalty in accordance with this CAFO, 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 EPA 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 EPA Penalty, interest, penalties, and other charges, that remain delinquent more than ninety (90) days. Any such amounts will accrue from the Effective Date.

60. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the EPA Penalty, interest, or other charges and penalties per this CAFO, EPA may take additional actions. Such actions 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 EPA or engaging in programs 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.

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 EPA Penalty amount.

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

#### **Conditions of Settlement**

62. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), Respondent is hereby ordered to take the following actions, and within sixty (60) calendar days of the Effective Date of this CAFO, Respondent shall provide in writing the following:

a. Respondent shall certify that it is operating the Facility in compliance with RCRA and has accurately and adequately complied with its RCRA Section 3010 notification for the Facility and within the prescribed time period.

b. Submission of the certification shall be sent electronically by email to:

Elizabeth Pham  
U.S. EPA Region 6

[Pham.elizabeth@epa.gov](mailto:Pham.elizabeth@epa.gov)

### **Additional Terms of Settlement**

63. The provisions of this CAFO shall apply to and be binding on Respondent, Respondent's officers, directors, partners, agents, employees, contractors, successors and assigns. Action or inaction of any persons, firms, contractors, employees, agents, or corporations acting under, through, or for Respondent shall not excuse any failure of Respondent to fully perform its obligations under this CAFO. Changes in ownership, real property interest, or transfer of personal assets shall not alter Respondent's obligations under this CAFO. Any change in the legal status of the Respondent, or change in ownership, partnership, corporate or legal status relating to the Facility, will not in any way alter Respondent's obligations and responsibilities under this CAFO.

64. By signing this CAFO, Respondent acknowledges that this CAFO will be available to the public and agrees that this CAFO does not contain any confidential business information. See 40 C.F.R. Part 2, Subpart B (Confidentiality of Business Information).

65. By signing this CAFO, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each submission, response, and statement. Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.

66. By signing this CAFO, Respondent certifies that it is presently in compliance with all requirements of RCRA and its implementing regulations.

67. By signing this CAFO, the undersigned representative of Respondent certifies that it is fully authorized to execute and enter into the terms and conditions of this CAFO and has the legal capacity to bind the party it represents to this CAFO.

68. Respondent and EPA agree to the use of electronic signatures for this matter. EPA and Respondent consent to service of this CAFO and final order by email at the following valid email addresses: mcdonald.ashley@epa.gov (for EPA) and dmedelstein@vorys.com (for Respondent).

69. Respondent specifically waives its right to seek reimbursement of its costs and attorney's fees under 5 U.S.C. § 504 and 40 C.F.R. Part 17.

**VI. EFFECT OF CONSENT AGREEMENT AND RESERVATION OF RIGHTS**

70. In accordance with 40 C.F.R. § 22.18(c), completion of the terms of this CAFO resolves only Respondent's liability, under Sections 3005(a) and 3008(a) of RCRA, 42 U.S.C. §§ 6925(a) and 6928(a), for federal civil penalties for the violations and facts alleged in Sections IV and V above. Complainant reserves the right to take any enforcement action with respect to any other violations of RCRA or any other applicable law.

71. The terms, conditions and requirements of this CAFO may not be modified or amended except upon the written agreement of both parties, and approval of the Regional Judicial Officer.

72. Penalties paid pursuant to this CAFO shall not be deductible for purposes of Federal, State, and local taxes.

73. When Respondent believes that it has complied with all the requirements of this CAFO, including compliance with the Compliance Order and payment of the civil penalty,



Respondent shall also certify this in writing and in accordance with the certification language set forth in Section VI (Compliance Order).

74. Any violation of the included Final Order may result in a civil judicial action for an injunction or civil penalties as well as criminal sanctions. EPA may use any information submitted under this CAFO in an administrative, civil judicial, or criminal action.

75. Nothing in this CAFO shall relieve Respondent of the duty to comply with all applicable provisions of the Act and other federal, state, or local laws or statutes, 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, or a determination of, any issue related to any federal, state, or local permit. EPA does not, by its consent to the entry of this CAFO, warrant or aver in any manner that Respondent's compliance with any aspect of this CAFO will result in compliance with provisions of RCRA, 42 U.S.C. § 6901 *et seq.*, or with any other provisions of federal, state, or local laws, regulations, or permits.

76. Nothing herein shall be construed to limit the power of EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.

77. If and to the extent EPA finds, after signing this CAFO, that any information provided by Respondent was materially false or inaccurate at the time such information was provided to EPA, EPA reserves any and all of its legal and equitable rights.

## **VII. EFFECTIVE DATE**

78. Respondent and Complainant agree to the issuance of the included Final Order. Upon filing, EPA will transmit a copy of the filed CAFO to Respondent. This CAFO shall become

effective after execution of the Final Order by the Regional Judicial Officer on the date of filing with the Regional Hearing Clerk. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

The foregoing Consent Agreement In the Matter of Reworld Advanced Processing, Inc., Docket No. RCRA-06-2025-0916, is Hereby Stipulated, Agreed, and Approved for Entry.

**FOR RESPONDENT:**

**REWORLD ADVANCED PROCESSING, INC.**

Date: 9-3-25

Marc Sansom  
Signature

Marc Sansom  
Print Name

Chief Operating Officer  
Title

**FOR COMPLAINANT:**

**U.S. ENVIRONMENTAL PROTECTION AGENCY**

Date: September 3, 2025

\_\_\_\_\_  
Cheryl T. Seager  
Director  
Enforcement and  
Compliance Assurance Division  
U.S. EPA, Region 6

The foregoing Consent Agreement In the Matter of Reworld Advanced Processing, Inc., Docket No. RCRA-06-2025-0916, is Hereby Stipulated, Agreed, and Approved for Entry.

**FOR RESPONDENT:**

**REORLD ADVANCED PROCESSING, INC.**

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

**FOR COMPLAINANT:**

**U.S. ENVIRONMENTAL PROTECTION AGENCY**

Date: \_\_\_\_\_

\_\_\_\_\_  
Cheryl T. Seager  
Director  
Enforcement and  
Compliance Assurance Division  
U.S. EPA, Region 6

## **FINAL ORDER**

Pursuant to Sections 3008(a) of RCRA, 42 U.S.C. § 6928(a), 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, the foregoing Consent Agreement resolving this matter is hereby ratified and incorporated by reference into this Final Order.

Reworld Advanced Processing, Inc. is ORDERED to comply with all of the terms of the Consent Agreement. In accordance with 40 C.F.R. § 22.31(b), 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.

This Final Order 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. This Final Order shall resolve only those causes of action alleged herein. Nothing in this Final Order shall be construed to waive, extinguish or otherwise affect Respondent's (or its officers, agents, servants, employees, successors, or assigns) obligation to comply with all applicable federal, state, and local statutes and regulations, including the regulations that were the subject of this action.

IT IS SO ORDERED.

Dated \_\_\_\_\_

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Thomas Rucki  
Regional Judicial Officer, Region 6

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Consent Agreement and Final Order was filed with me, the Regional Hearing Clerk, U.S. EPA - Region 6, 1201 Elm Street, Suite 500, Dallas, Texas 75270-2102, and that I sent a true and correct copy on this day in the following manner to the email addresses:

**Copy via Email to Complainant:**

Mcdonald.ashley@epa.gov

**Copy via Email to Respondent:**

jhartley@reworldwaste.com  
Joel Hartley  
Circon Environmental – 225 Plant  
9400 Strang Rd.  
La Porte, TX 77571

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Regional Hearing Clerk  
U.S. EPA, Region 6