

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

U.S. EPA-REGION 3-RHC
FILED-30OCT2019pm12:04

In the Matter of:	:	
	:	
Potomac Supply, LLC	:	U.S. EPA Docket No. RCRA-03-2020-0006
1398 Kinsale Road	:	
Kinsale, VA 22488	:	Proceeding under Section 3008(a) of the Resource
	:	Conservation and Recovery Act, as amended, 42
Respondent.	:	U.S.C. Section 6928(a)
	:	
Potomac Supply, LLC	:	
1398 Kinsale Road	:	
Kinsale, VA 22488	:	
	:	
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 Potomac Supply, LLC (“Respondent”) (collectively the “Parties”), pursuant to Sections 3008(a) and (g) of the Solid Waste Disposal Act, commonly known as the Resource Conservation and Recovery Act of 1976, as amended by *inter alia*, the Hazardous and Solid Waste Amendments of 1984 (collectively referred to hereinafter as “RCRA”), 42 U.S.C. §§ 6928(a) and (g), 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. 42 U.S.C. Section 6928(a)(2), RCRA Section 3008(a)(1), 42 U.S.C. Section 6928(a)(1), authorizes the Administrator of the U.S. Environmental Protection Agency to assess penalties and undertake other actions required by this Consent Agreement. 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 “CAFO”) resolve Complainant’s civil penalty claims against Respondent under RCRA (or the “Act”) 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 has jurisdiction over the above-captioned matter, as described in Paragraph 1, above.
4. The Commonwealth of Virginia has received federal authorization to administer a Hazardous Waste Management Program (the “Virginia Hazardous Waste Management Program”) in lieu of the federal hazardous waste management program authorized under RCRA Subtitle C, 42 U.S.C. §§6921 – 6939(g). Effective December 18, 1984, the VHWMR was authorized by the EPA pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), and 40 C.F.R. Part 271, Subpart A and thereby became requirements of RCRA Subtitle C and enforceable by EPA pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a). *See 65 Fed. Reg.* 46606 (July 31, 2000)), June 20, 2003 (*see 68 Fed. Reg.* 36925 (June 20, 2003)), July 10, 2006 (*see 71 Fed. Reg.* 27216 (May 10, 2006)) July 30, 2008 (*see 73 Fed. Reg.* 44168 (July 30, 2008)) and in part on November 4, 2013 with revisions not applicable here (*see 78 Fed. Reg.* 54178). The VHWMR incorporate, with certain exceptions, specific provisions of Title 40 of the 2010 Code of Federal Regulations by reference.
5. EPA has given the Commonwealth of Virginia, through the Virginia Department of Environmental Quality (“VADEQ”), prior notice of the initiation of this action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).
6. This Consent Agreement (“CA”) and the accompanying Final Order (“FO”) (hereinafter jointly referred to as this “CAFO”) address alleged violations by Respondent of RCRA and the federally authorized Virginia Hazardous Waste Management Regulations (“VHWMR”), codified at 9 VAC 20-60-12 *et. seq.*
7. The Consolidated Rules of Practice govern this administrative adjudicatory proceeding pursuant to 40 C.F.R. § 22.1(a)(4).

GENERAL PROVISIONS

8. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this CAFO.
9. Except as provided in Paragraph 8, above, Respondent neither admits nor denies the specific factual allegations set forth in this Consent Agreement.
10. 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 CAFO.

11. For purposes of this proceeding only, Respondent hereby expressly waives its right to contest the allegations set forth in this CAFO and waives its right to appeal the accompanying Final Order.
12. 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.
13. Respondent shall bear its own costs and attorney's fees in connection with this proceeding.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

14. 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.
15. Respondent is and was at the time of the violations alleged herein, a limited liability company of the State of Delaware.
16. Respondent is, and at the time of the violations alleged herein, a "person" as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and 9 VAC 20-60-260.A.
17. Respondent is, and since November 2012 has been, the "owner" and "operator" of a "facility," described in paragraph 18, below, as the terms "facility", "owner" and "operator" are defined in 40 C.F.R. § 260.10, as incorporated by reference in 9 VAC 20-60-260.A.
18. The facility referred to in Paragraph 17, above, including all of its associated equipment and structures (hereinafter the "Facility"), is a wood treating facility located at 1398 Kinsale Road, Kinsale, Virginia, 22488.
19. Respondent is assigned EPA RCRA ID No. VAD003121308.
20. Respondent is and, at all times relevant to this CAFO has been, a "generator" of, and has engaged in the "storage" in "containers" at the Facility of materials described below that are "solid wastes" and "hazardous wastes" as those terms are defined in 40 C.F.R. § 260.10, as incorporated by reference in 9 VAC 20-60-260.A.
21. On May 16, 2017, representatives of EPA conducted an EPA Compliance Evaluation Inspection (EPA CEI) at Respondent's Facility.
22. On December 12, 2018, EPA issued an Opportunity to Show Cause and Enter into Consent Agreement to Respondent.

23. Under cover of letter dated February 4, 2019, Respondent submitted a timely response to the Opportunity to Show Cause and Enter into Consent Agreement.
24. Respondent generates wood preserving waste at the Facility which is a hazardous waste (EPA Hazardous Waste No. F035) within the meaning of 9 VAC 20-60-261.A, which incorporates by reference 40 C.F.R. § 261.31, because it is a listed hazardous waste.
25. Respondent generates waste solvent-based paint at the Facility which is a hazardous waste (EPA Hazardous Waste No. D001) within the meaning of 9 VAC 20-60-261.A, which incorporates by reference 40 C.F.R. § 261.21, because it exhibits the characteristic of ignitability.
26. From at least May 16, 2017 to the present, Respondent's material described in Paragraph 25, above, was in "storage" in containers and tanks at the Facility are defined in 40 C.F.R. § 260.10, as incorporated by reference in 9 VAC 20-60-260.A..

Count I
Failure to Make Hazardous Waste Determinations

27. The preceding paragraphs are incorporated by reference.
28. 9 VAC 20-60-262.A, which incorporates by reference 40 C.F.R. § 262.11 with exceptions not relevant herein, provides that 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 following methods:
 - (a) The person should first determine if the waste is excluded from regulation under 40 C.F.R. § 261.4.
 - (b) The person must then determine if the waste is listed as a hazardous waste in subpart D of 40 C.F.R. Part 261.
 - (c) For purposes of compliance with 40 C.F.R. Part 268, or if the waste is not listed in subpart D of 40 C.F.R. Part 261, the generator must then determine whether the waste is identified in subpart C of 40 C.F.R. Part 261 by either:
 - (1) Testing the waste according to the methods set forth in subpart C of 40 C.F.R. Part 261, or according to an equivalent method approved by the Administrator under 40 C.F.R. § 260.21; or
 - (2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.
29. At the time of the EPA CEI, Respondent had discarded waste aerosol cans in the regular trash at the Facility. Respondent had not conducted a hazardous waste determination on the contents of aerosol cans before Respondent discarded the aerosol cans.

30. At the time of the EPA CEI, Respondent had discarded waste lamps in the regular trash at the Facility. Respondent had not conducted a hazardous waste determination on the waste lamps before Respondent discarded the waste lamps.
31. The waste aerosol cans and waste lamps are described in Paragraphs 29 – 30, above, above are “solid wastes” within the meaning of 9 VAC 20-60-26.A which incorporates by reference 40 C.F.R. § 261.2.
32. On May 16, 2017, Respondent violated 9 VAC 20-60-262.A which incorporates by reference 40 C.F.R. § 262.11, by failing to make hazardous waste determinations for solid waste at the Facility.
33. In failing to comply with 9 VAC 20-60-262.A, which incorporates by reference 40 C.F.R. § 262.11, Respondent is subject to the assessment of penalties under Sections 3008(a) and (g) of RCRA, 42 U.S.C. §§ 6928(a) and (g).

Count II

Failure to Obtain and Keep on File a Certified Assessment by a Professional Engineer

34. The preceding paragraphs are incorporated by reference.
35. Pursuant to 9 VAC 20-60-264.A, which incorporates by reference 40 C.F.R. § 264.571(a), the owner or operator of an existing drip pad must obtain and keep on file at the facility a written assessment of the drip pad, reviewed and certified by a qualified Professional Engineer that attests to the results of the evaluation.
36. At the time of the EPA CEI, Respondent was the owner or operator of an existing drip pad (Drip Pad), including a concrete process area (Process Area).
37. At the time of the EPA CEI, Respondent had not obtained a written assessment of the Process Area of the Drip Pad, reviewed and certified by a qualified Professional Engineer that attests to the results of the evaluation, as required by 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. § 264.571(a).
38. At the time of the EPA CEI, Respondent had not obtained an annual assessment for the Process Area of the Facility Drip Pad, as required by 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. § 264.571(a).
39. At the time of the EPA CEI, Respondent had not kept on file at the Facility the Professional Engineer certification for the Process Area of the Facility Drip Pad required by 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. § 264.571(a).
40. In failing to comply with 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. § 264.571(a), Respondent is subject to the assessment of penalties under Section 3008(a) and (g) of RCRA, 42 U.S.C. §§ 6928(a) and (g).

III. COMPLIANCE ORDER

41. Respondent shall perform the following Compliance Tasks set forth in this Section within the time specified. Respondent shall certify completion of such Compliance Tasks set forth in Paragraphs 42 - 44 in accordance with Paragraph 45, below, no later than sixty (60) Days after Respondent's receipt of the fully executed CAFO. "Days" as used herein shall mean calendar days unless specified otherwise.
42. Respondent will obtain and keep on file at the Facility a written assessment of the Drip Pad, including the Process Area at the Facility, reviewed and certified by a qualified Professional Engineer that attests to the results of the evaluation as set forth at 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. § 264.571(a).
43. Respondent shall develop a standard operating procedure that ensures that the Facility has a written assessment of the Process Area at the Facility, reviewed and certified by a qualified Professional Engineer that attests to the results of the evaluation as set forth at 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. § 264.571(a), and that such assessment takes place annually. Respondent shall certify to EPA, in the manner set forth in Paragraph 43, that it has placed such standard operating procedure in the Facility operations manual. Respondent shall provide a copy of such standard operating procedure to EPA.
44. Respondent shall develop a standard operating procedure that ensures that the Facility complies with the applicable requirements 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. § 264 Subpart W, with regard to the Facility Drip Pad and Process Area. Respondent shall certify to EPA, in the manner set forth in Paragraph 45, that it has placed such standard operating procedure in the Facility operations manual. Respondent shall provide a copy of such standard operating procedure to EPA.
45. Submissions to EPA: Any notice, certification, data presentation, or other document submitted by Respondent pursuant to this Compliance Order which discusses, describes, demonstrates, or supports any finding or makes any representation concerning Respondent's compliance or non-compliance with any requirements of this Compliance Order shall be certified by a responsible corporate officer of Respondent. A responsible corporate officer means: (1) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or (2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures. The aforesaid certification shall provide the following statement above the signature of the responsible corporate officer signing the certification on behalf of the Respondent:

I certify under penalty of law that this document and all attachments are true, accurate and complete. As to [the/those] identified portions of this [type of submission] for which I cannot personally verify [its/their] accuracy, I certify under penalty of law that this [type of submission] and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____
Name: _____
Title: _____

Except as otherwise provided herein, notifications or submissions to EPA required by this Compliance Order shall be sent to the attention of:

Rebecca Serfass (3ED22)
RCRA Section
Air, RCRA & Toxics Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency Region III
1650 Arch Street
Philadelphia, PA 19103-2029; and

Joyce A. Howell (3RC40)
Sr. Assistant Regional Counsel
U.S. Environmental Protection Agency Region III
1650 Arch Street
Philadelphia, PA 19103-2029

CIVIL PENALTY

46. 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 THIRTY-EIGHT THOUSAND TWO HUNDRED FIFTY-TWO DOLLARS (\$38,252.00), which Respondent shall be liable to pay in accordance with the terms set forth below.

47. The civil penalty is based upon EPA's consideration of a number of factors, including the penalty criteria ("statutory factors") set forth in in Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), which include the seriousness of the violation and any good faith efforts to comply with the applicable requirements. These factors were applied to the particular facts and circumstances of this case with specific reference to EPA's October, 1990 RCRA Civil Penalty Policy, as revised in June, 2003 ("RCRA Penalty Policy") which reflects the statutory penalty criteria and factors set forth at Sections 3008(a)(3) and (g) of RCRA, 42 U.S.C. §§ 6982(a)(3) and (g), 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.
48. 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.*, RCRA-03-2020-0006;
 - 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 979077
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 to:

Joyce A. Howell
Senior Assistant Regional Counsel
U.S. EPA, Region III (3RC40)
1650 Arch Street
Philadelphia, PA 19103-2029
howell.joyce@epa.gov

49. 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.
50. Payment of the civil penalty is due and payable immediately upon receipt by Respondent of a true and correct copy of the fully executed and filed CAFO. Receipt by Respondent or Respondent's legal counsel of such copy of the fully executed CAFO, with a date stamp indicating the date on which the CAFO 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).
51. INTEREST: In accordance with 40 C.F.R. § 13.11(a)(1), interest on the civil penalty assessed in this CAFO will begin to accrue on the date that a copy of the fully executed and filed CAFO 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).
52. 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). Pursuant to Appendix 2 of EPA's *Resources Management Directives – Case Management*, Chapter 9, EPA will 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.
53. 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).
54. Respondent agrees not to deduct for federal tax purposes the civil penalty assessed in this CAFO. 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 requirements in Section III is restitution or required to come into compliance with law.

GENERAL SETTLEMENT CONDITIONS

55. By signing this Consent Agreement, Respondent acknowledges that this CAFO will be available to the public and represents that, to the best of Respondent's knowledge and belief, this CAFO does not contain any confidential business information or personally identifiable information from Respondent.
56. Respondent certifies that any information or representation it has supplied or made to EPA concerning this matter 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 CAFO, 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

57. Respondent will certify to EPA, upon completion of the tasks required under Section III of this Consent Agreement (Compliance Order) and after Respondent's personal investigation and to the best of its knowledge and belief, that it is in compliance with regard to the violations alleged in this Consent Agreement.

OTHER APPLICABLE LAWS

58. Nothing in this CAFO 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 CAFO does not constitute a waiver, suspension or modification of the requirements of RCRA, or any regulations promulgated thereunder.

RESERVATION OF RIGHTS

59. This CAFO resolves only EPA's claims against Respondent for the specific violations alleged against Respondent in this CAFO. 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, the regulations promulgated thereunder and any other federal law or regulation to enforce the terms of this CAFO after its effective date.

EXECUTION /PARTIES BOUND

60. This CAFO 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 CAFO.

EFFECTIVE DATE

61. The effective date of this CAFO 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

62. This CAFO 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 CAFO.

In re: Potomac Supply, LLC
RCRA-03-2020-0006

For Respondent: POTOMAC SUPPLY, LLC

Date: 10/10/2019


By: T Jones
Thomas Darcy Jones
President and Chief Executive Officer

In re: Potomac Supply, LLC
RCRA-03-2020-0006

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: OCT 23 2019

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

Attorney for Complainant:

Date: October 16, 2019

By: 
Joyce A. Howell
Sr. Assistant Regional Counsel
U.S. EPA – Region III

in the attached Consent Agreement, that the civil penalty agreed to therein was based upon a consideration of the factors set forth in Section 3008(a)(3) and (g), 42 U.S.C. § 6928(a)(3) and (g), IT IS HEREBY ORDERED that Respondent pay a civil penalty of **THIRTY-EIGHT THOUSAND TWO HUNDRED FIFTY-TWO DOLLARS (\$38,252.00)**, and comply with each of the additional terms and conditions as specified in the attached 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 this Consent Agreement and Final Order is the date on which such Final Order is filed with the Regional Hearing Clerk.

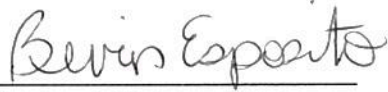
Oct. 30, 2019
Date:



Joseph J. Lisa
Regional Judicial Officer
U.S. EPA, Region III

In re: Potomac Supply, LLC
EPA Docket No. RCRA-03-2020-0006

Dated: OCT 30 2019


Bevin Esposito
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region III

TRACKING NUMBERS: ZA43F710194458361