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**U.S. EPA REGION 4
HEARING CLERK**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

In the Matter of:

Century Aluminum of South Carolina, Inc.
3575 Highway 52
Goose Creek, South Carolina 29445
EPA ID No.: **SCD097366165**

Respondent.

Docket No.: **RCRA-04-2026-4003(b)**

Proceeding Under Section 3008(a) of the
Resource Conservation and Recovery Act,
42 U.S.C. § 6928(a)

CONSENT AGREEMENT

I. NATURE OF ACTION

1. This is an administrative penalty assessment proceeding brought 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 of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits*, as codified at Title 40 of the Code of Federal Regulations (C.F.R.), Part 22.
2. This Consent Agreement and the attached Final Order shall collectively be referred to as the CAFO.
3. Having found that settlement is consistent with the provisions and objectives of the Act and applicable regulations, the Parties have agreed to settle this action pursuant to 40 C.F.R. § 22.18 and consent to the entry of this CAFO without the Respondent's admission of violation or adjudication of any issues of law or fact herein.

II. PARTIES

4. The Complainant is the Director, Enforcement and Compliance Assurance Division, United States Environmental Protection Agency (EPA) Region 4, who has been delegated the authority on behalf of the Administrator of the EPA to enter into this CAFO pursuant to 40 C.F.R. Part 22 and Section 3008(a) of the Act.

5. The Respondent is Century Aluminum of South Carolina, Inc., a corporation doing business in the State of South Carolina. This proceeding pertains to the Respondent's facility located at 3375 Highway 52, Goose Creek, South Carolina 29445 (Facility).

III. GOVERNING LAW

6. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the State of South Carolina (State) has received final authorization to implement a hazardous waste program in lieu of the federal program set forth in RCRA. The requirements of the authorized State program are found in the South Carolina Hazardous Waste Management Act (SCHWMA), S.C. Code Ann. § 44-56-10 to 44-56-840, and South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270 and 273.
7. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), the requirements established by the Hazardous and Solid Waste Amendments of 1984 (HSWA), Pub. L. 98-616, are immediately effective in all states regardless of their authorization status and are implemented by the EPA until a state is granted final authorization with respect to those requirements. The State has received final authorization for certain portions of HSWA, including those recited herein.
8. Although the EPA has granted the State authority to enforce its own hazardous waste program, the 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 the EPA in the manner set forth in the Memorandum of Agreement between the EPA and the State.
9. As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations for the violations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.
10. Pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), the Complainant has given notice of this action to the State before issuance of this CAFO.
11. Section 44-56-30 of the SCHWMA, S.C. Code Ann. § 44-56-30 [Section 3002(a) of RCRA, 42 U.S.C. § 6922(a)], requires the promulgation of standards applicable to generators of hazardous waste. The implementing regulations for these standards are found at S.C. Code Ann. Regs. 61-79.262 [40 C.F.R. Part 262].
12. Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], sets forth the requirement that a facility treating, storing, or disposing of hazardous waste must have a permit or interim status. The implementing regulations for this requirement are found at S.C. Code Ann. Regs. 61-79.264 (permitted) and 61-79.265 (interim status) [40 C.F.R. Parts 264 (permitted) and 265 (interim status)].
13. Pursuant to S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], a "solid waste" is any discarded material that is not otherwise excluded from the regulations. A discarded material

includes any material that is abandoned by being accumulated, stored, or treated (but not recycled) before or in lieu of being abandoned by being disposed of, burned, or incinerated.

14. Pursuant to S.C. Code Ann. Regs. 61-79.261.3 [40 C.F.R. § 261.3], a solid waste is a “hazardous waste” if it meets any of the criteria set forth in S.C. Code Ann. Regs. 61-79.261.3(a)(2) [40 C.F.R. § 261.3(a)(2)] and is not otherwise excluded from regulation as a hazardous waste by S.C. Code Ann. Regs. 61-79.261.4(b) [40 C.F.R. § 261.4(b)].
15. Pursuant to S.C. Code Ann. Regs. 61-79.261.3(a)(2)(i) and 261.20 [40 C.F.R. §§ 261.3(a)(2)(i) and 261.20], solid wastes that exhibit any of the characteristics identified in S.C. Code Ann. Regs. 61-79.261.21-24 [40 C.F.R. §§ 261.21-24] are characteristic hazardous waste and are provided with the EPA Hazardous Waste Numbers D001 through D043.
16. Pursuant to S.C. Code Ann. Regs. 61-79.261.20-21 [40 C.F.R. §§ 261.20-21], a solid waste that exhibits the characteristic of ignitability is a hazardous waste and is identified with the EPA Hazardous Waste Number D001.
17. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity is a hazardous waste and is identified with the EPA Hazardous Waste Numbers D004-D043, which correspond to the toxic contaminant causing it to be hazardous.
18. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for chromium is identified with the EPA Hazardous Waste Number D007.
19. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for lead is identified with the EPA Hazardous Waste Number D008.
20. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for mercury is identified with the EPA Hazardous Waste Number D009.
21. Pursuant to S.C. Code Ann. Regs. 61-79.261.20 and 261.24 [40 C.F.R. §§ 261.20 and 261.24], a solid waste that exhibits the characteristic of toxicity for methyl ethyl ketone is identified with the EPA Hazardous Waste Number D035.
22. Pursuant to S.C. Code Ann. Regs. 61-79.261.3(a)(2)(ii) and 261.30 [40 C.F.R. §§ 261.3(a)(2)(ii) and 261.30], a solid waste is a listed “hazardous waste” if it is listed in S.C. Code Ann. Regs. 61-79.261, Subpart D [40 C.F.R. Part 261, Subpart D].
23. Listed hazardous wastes include the K-Listed wastes from specific sources identified in S.C. Code Ann. Regs. 61-79.261.32 [40 C.F.R. § 261.32].

24. Pursuant to S.C. Code Ann. Regs. 61-79.261.32(a) [40 C.F.R. § 261.32(a)], spent potliners (SPL) from primary aluminum reduction are listed hazardous wastes when discarded and are identified with the EPA Hazardous Waste Number K088.
25. Listed hazardous wastes include the F-Listed wastes from nonspecific sources identified in S.C. Code Ann. Regs. 61-79.261.31 [40 C.F.R. § 261.31].
26. Pursuant to S.C. Code Ann. Regs. 61-79.261.31(a) [40 C.F.R. § 261.31(a)], a solid waste is a listed hazardous waste from a nonspecific source and identified with the EPA Hazardous Waste Number F003 if it exhibits the characteristic of ignitability (D001) and contains any of the following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/blends containing, before use, only the foregoing spent non-halogenated solvents; all spent solvent mixtures/blends containing, before use, one or more of the foregoing non-halogenated solvents, and a total of ten percent or more (by volume) of one or more of the other solvents identified by the EPA Hazardous Waste Numbers F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
27. Pursuant to S.C. Code Ann. Regs. 61-79.261.31(a) [40 C.F.R. § 261.31(a)], a solid waste is a listed hazardous waste from a nonspecific source and identified with the EPA Hazardous Waste Number F005 if it exhibits the characteristic of ignitability (D001) or toxicity (D004 to D043) and contains any of the following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the foregoing non-halogenated solvents or other solvents identified by the EPA Hazardous Waste Numbers F001, F002, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
28. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “container” means any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled.
29. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “contingency plan” means a document setting out an organized, planned, and coordinated course of action to be followed in case of a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.
30. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “containment building” means a hazardous waste management unit that is used to store or treat hazardous waste under the provisions of Subpart DD of S.C. Code Ann. Regs. 61-79.264 or 265 [Subpart DD of 40 C.F.R. Parts 264 or 265].
31. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “facility” includes “all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste.”

32. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “generator” is defined as any person, by site, whose act or process produces hazardous waste identified or listed in S.C. Code Ann. Regs. 61-79.261 [40 C.F.R. Part 261], or whose act first causes a hazardous waste to become subject to regulation.
33. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], “large quantity generator” (LQG) includes a generator who generates greater than or equal to one thousand (1,000) kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.
34. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], an “owner” is “the person who owns a facility or part of a facility” and an “operator” is “the person responsible for the overall operation of a facility.”
35. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a “person” means an individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, or political subdivision of a State, or any interstate body.
36. Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], “storage” means the holding of a hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.
37. Pursuant to S.C. Code Ann. Regs. 61-79.273.9 [40 C.F.R. § 273.9], a “small quantity handler of universal waste” (SQHUW) is a universal waste handler (including any generator) who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.
38. Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.262.16(b) or 262.17(a) [40 C.F.R. §§ 262.16(b) or 262.17(a)], except as required in S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter the “SAA Permit Exemption”).
39. Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

40. Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.
41. Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (hereinafter the "LQG Permit Exemption").
42. Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(1)(i) and (iii) [40 C.F.R. § 265.1101(c)(1)(i) and (iii)], and is a condition of the LQG Permit Exemption, owners or operators of all containment buildings must use controls and practices to ensure containment of the hazardous waste within the unit, including; at a minimum: (i) Maintaining the primary barrier to be free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the primary barrier; and (iii) Taking measures to prevent the tracking of hazardous waste out of the unit by personnel or by equipment used in handling the waste.
43. Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(3)(i) and (iii) [40 C.F.R. § 265.1101(c)(3)(i) and (iii)], and is a condition of the LQG Permit Exemption, throughout the active life of the containment building, if the owner or operator detects a condition that could lead to or has caused a release of hazardous waste, the owner or operator must repair the condition promptly, in accordance with the following procedures: (i) Upon detection of a condition that has led to a release of hazardous waste (e.g., upon detection of leakage from the primary barrier) the owner or operator must: (A) Enter a record of the discovery in the facility operating record; (B) Immediately remove the portion of the containment building affected by the condition from service; (C) Determine what steps must be taken to repair the containment building, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup and repairs; and (D) Within 7 days after the discovery of the condition, notify the South Carolina Department of Environmental Services (SCDES) of the condition, and within 14 working days, provide a written notice to SCDES with a description of the steps taken to repair the containment building, and the schedule for accomplishing the work; and (iii) Upon completing all repairs and cleanup, the owner or operator must notify SCDES in writing and provide a verification, signed by a qualified, registered professional engineer, that the repairs and cleanup have been completed according to the written plan submitted in accordance with S.C. Code Ann. Regs. 61-79.265.1101(c)(3)(i)(D).
44. Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(4) [40 C.F.R. § 265.1101(c)(4)], and is a condition of the LQG Permit Exemption, owners and operators of all containment buildings must inspect and record in the facility's operating record, at least once every 7 days, data gathered from monitoring and leak detection equipment as well as the containment building

and the area immediately surrounding the containment building to detect signs of releases of hazardous waste.

45. Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, an LQG that first becomes subject to S.C. Code Ann. Regs. 262.262(b) after May 30, 2017, or that is amending its contingency plan must at that time submit a quick reference guide (QRG) of the contingency plan to the local emergency responders and/or, as appropriate, the Local Emergency Planning Committee.
46. Pursuant S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a SQHUW must contain any lamp (*i.e.* the bulb or tube portion of a lighting device under S.C. Code Ann. Regs. 61-79.273.9 [40 C.F.R. § 273.9]) 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.
47. Pursuant to S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."
48. Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c)(1)-(6) [40 C.F.R. § 273.15(c)(1)-(6)], a SQHUW must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received. The handler may make this demonstration by: (1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received; (2) Marking or labeling each individual item of universal waste with the date it became waste or was received; (3) Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received; (4) Maintaining an inventory system onsite that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became waste or was received; (5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became waste or was received; or (6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or was received.

IV. FINDINGS OF FACTS

49. The Respondent is a metals and mining company that operates a primary aluminum smelter at the Facility, which produces marketable aluminum from the raw material aluminum oxide (alumina) using an aluminum reduction process.
50. On July 27, 2015, the Respondent notified the State as an LQG and a SQHUW at the Facility. Since 2015, the Respondent has maintained this status for the Facility. Hazardous wastes generated at the Facility consist primarily of SPL (K088), as well as characteristic hazardous

waste (e.g., D001, D007 through D009, and D035) and listed hazardous waste (e.g., F003 and F005) from aerosol can puncturing and the management of broken lamps as hazardous waste.

51. On June 26, 2024, the EPA and the South Carolina Department of Health and Environmental Control (DHEC), which is now SCDES,¹ conducted a compliance evaluation inspection (CEI) at the Facility. The EPA's findings of the CEI were documented in a report that was emailed to the Respondent on January 13, 2025.
52. Following the CEI, the Respondent provided additional information to the EPA and SCDES in emails sent on July 3 and 24, 2024, March 28, 2025, May 6, 2025, and October 27, 2025.
53. At the time of the CEI, the inspectors observed an aerosol can puncturing device on top of a metal container in a SAA identified as SA-2 in Building 270 at the Facility. The metal container had a "Hazardous Waste" label and indicated that the container held "Paint Aerosol Liquid" identified with EPA Hazardous Waste Numbers "D001, D007, D008, D035, F003, F005." The inspectors observed that the puncturing device was not in use and was initially open at the time of the CEI but then was immediately closed.
54. At the time of the CEI, the inspectors observed a 55-gallon metal container in a SAA inside the Universal Waste Connex outside the hazardous waste central accumulation area (CAA) adjacent to Building 139. The container held broken lamps being managed as D009 hazardous waste. The container was labeled as "Hazardous Waste" and was marked with a Class 9 DOT label but was not marked with an indication of the hazards of the contents.
55. At the time of the CEI, the inspectors observed the following conditions in and around a containment building identified as Containment Building 138, where aluminum pots are cleaned and repaired at the Facility:
 - a. A small hole in the building wall and loose metal siding with a release of material that EPA alleges was hazardous waste (K088) to the environment immediately adjacent to the hole and loose siding;
 - b. The building's roll-up vehicle door would not close due to a buildup of material that EPA alleges was hazardous waste (K088) at the edges of the door, such that the material had been released to the environment through the gap created by the improperly maintained roll-up vehicle door; and
 - c. The metal siding near the roll-up vehicle door was bent and damaged, which resulted in a gap, allowing the release of material that EPA alleges was hazardous waste (K088) to the environment immediately outside the building.

¹ On July 1, 2024, DHEC was restructured into a health agency, the Department of Public Health, and a separate environmental agency, the South Carolina Department of Environmental Services (SCDES), with SCDES retaining and continuing all functions, powers, and duties of the environmental divisions, offices, and programs of DHEC, including the authority to administer and enforce the State's authorized hazardous waste program in lieu of RCRA.

56. Upon review of the Respondent's weekly inspection records for Containment Building 138 from January 2023 to May 2024, inspectors observed that:
- a. Forty (40) such records noted instances of "material tracking" in the area outside of containment, and some also noted "visible SPL on outside storage pad" and "SPL residue" on "Mobile equipment/trailers/containers," with no record of corrective actions taken to clean-up, mitigate or prevent the tracking of hazardous waste (K088) out of the building;
 - b. Facility personnel had recorded "No" in response to the line item "Building roof and walls free of damage?" on 16 weekly inspection records, with no record that the identified conditions were promptly repaired; and
 - c. The Respondent failed to provide any record of having inspected Containment Building 138 for a total of 34 weeks in the time period from January 2023 through March 2024.
57. At the time of the CEI, the inspectors observed that the Respondent maintained a contingency plan dated October 2020 for the Facility; however, the Respondent did not have a QRG and, therefore, had not submitted a copy of any QRG to local emergency responders and/or a Local Emergency Planning Committee at the time of the CEI.
58. At the time of the CEI, the inspectors observed a 6-foot container and two other containers of universal waste lamps in the Universal Waste Connex outside the CAA adjacent to Building 139. The containers were not fully closed to prevent breakage or release of the contents.
59. At the time of the CEI, the inspectors observed a 5-foot container of universal waste lamps in the SAA identified as SA-2A in Building 270 at the Facility. The container was not labeled with the words "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."
60. At the time of the CEI, the Respondent failed to demonstrate the length of time that universal waste lamps had been accumulated in the following containers:
- a. A 5-foot container of universal waste lamps that was not marked or labeled with an accumulation start date in the SAA identified as SA-2A in Building 270; and
 - b. Four 4-foot tube containers of universal waste lamps which were not marked or labeled with an accumulation start date in the CAA adjacent to Building 139.

V. ALLEGED VIOLATIONS

61. The Respondent is a "person" as defined in S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10].
62. The Respondent is the "owner" and "operator" of a "facility" located in Goose Creek, South Carolina, as those terms are defined in S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10].

63. The Respondent is a “generator” of “solid wastes” that are “hazardous wastes” as defined in S.C. Code Ann. Regs. 61-79.260.10, 261.2, and 261.3 [40 C.F.R. §§ 260.10, 261.2 and 261.3].
64. The Respondent is an “LQG” of “hazardous waste” and a “SQHUW” as those terms are defined in S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], 61-79.261.3 [40 C.F.R. § 261.3], and 61-79.273.9 [40 C.F.R. § 273.9].
65. The Respondent failed to close an aerosol can puncturing device on top of a 55-gallon container of hazardous waste in the SAA identified as SA-2A, such that the container of hazardous waste was not closed. The EPA therefore alleges that the Respondent violated Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], by storing hazardous waste without a permit or interim status, because the Respondent failed to meet a condition of the SAA Permit Exemption by failing to keep its containers of hazardous waste closed in accordance with S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)].
66. The Respondent failed to mark an indication of the hazards of the contents on a 55-gallon container of broken waste lamps being managed as hazardous waste in a SAA. The SAA was located within a Universal Waste Connex outside the CAA adjacent to Building 139. The EPA therefore alleges that the Respondent violated Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], by storing hazardous waste without a permit or interim status, because the Respondent failed to meet a condition of the SAA Permit Exemption by failing to comply with the marking and labeling requirement in Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)].
67. The Respondent failed, at the time of the CEI, to maintain the primary barrier of Containment Building 138 to be free of significant cracks, gaps, corrosion, or other deterioration that EPA alleges caused a release of hazardous waste, as a result of a small hole observed by inspectors in the building wall and loose metal siding, a roll-up vehicle door that was not fully closed due to the buildup of hazardous waste at the edges, and bent and damaged metal siding near the building’s roll-up vehicle door. The Respondent also failed to notify SCDES of these conditions, remove the affected area of the building from service, or document repairs to the building. The EPA therefore alleges that the Respondent violated Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], by storing hazardous waste without a permit or interim status, because the Respondent failed to meet a condition of the LQG Permit Exemption set forth in S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], by not complying with the containment building standards in S.C. Code Ann. Regs. 61-79.265.1101(c)(1)(i) and (c)(3)(i) [40 C.F.R. § 265.1101(c)(1)(i) and (c)(3)(i)].
68. The Respondent failed to take measures to prevent the tracking of hazardous waste (K088) out of Containment Building 138, as documented in 40 of the Respondent’s weekly inspection records for the building from January 2023 through March 2024 that identify “material

tracking” in the area outside of containment, with no record of any corrective actions taken.² The EPA therefore alleges that the Respondent violated Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], by storing hazardous waste without a permit or interim status, because the Respondent failed to meet a condition of the LQG Permit Exemption set forth in S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], by not complying with the containment building standards in S.C. Code Ann. Regs. 61-79.265.1101(c)(1)(iii) [40 C.F.R. § 265.1101(c)(1)(iii)].

69. The Respondent, in 16 weekly inspection records for Containment Building 138 from January 2023 through March 2024, documented damage to the roof and walls of Containment Building 138 but failed to document that such damage was promptly repaired so as to maintain the primary barrier of the building to be free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released. The EPA therefore alleges that the Respondent violated Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], by storing hazardous waste without a permit or interim status, because the Respondent failed to meet a condition of the LQG Permit Exemption set forth in S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], by not complying with the containment building standards in S.C. Code Ann. Regs. 61-79.265.1101(c)(1)(i) [40 C.F.R. § 265.1101(c)(1)(i)].
70. The Respondent failed on 34 occasions, from January 2023 to March 2024, to inspect and record, at least every 7 days, the condition of the area immediately surrounding Containment Building 138 to detect signs of release of hazardous waste. The EPA therefore alleges that the Respondent violated Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], by storing hazardous waste without a permit or interim status, because the Respondent failed to meet a condition of the LQG Permit Exemption set forth in S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], by not complying with the containment building standards in S.C. Code Ann. Regs. 61-79.265.1101(c)(4) [40 C.F.R. § 265.1101(c)(4)].
71. The Respondent failed to develop or maintain a QRG of the contingency plan and failed to submit a QRG to local emergency responders and/or a Local Emergency Planning Committee. The EPA therefore alleges that the Respondent violated Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], by storing hazardous waste without a permit or interim status, because the Respondent failed to meet a condition of the LQG Permit Exemption set forth in S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], by not complying with the QRG requirement in S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)].
72. The Respondent failed to fully close three containers of universal waste lamps in the Universal Waste Connex outside the CAA adjacent to Building 139. The EPA therefore alleges that the

² While some of the 40 inspection records also noted “visible SPL” on an “outside storage pad” and/or “SPL residue” on “Mobile equipment/trailers/containers,” the EPA concluded these additional notes were potentially based on the same observations as the “material tracking” ones and, therefore, did not identify them as separate violations.

Respondent violated S.C. Code Ann. Regs. 61-79.273.13(d) [40 C.F.R. § 273.13(d)(1)], by failing to ensure that the containers of universal waste lamps remained closed.

73. The Respondent failed to label or mark a 5-foot container of universal waste lamps in the SAA identified as SA-2A with the words "Universal Waste-Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)." The EPA therefore alleges that the Respondent violated S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], by failing to comply with the universal waste labeling requirements.
74. The Respondent failed to demonstrate the length of time that universal waste lamps had been accumulated in a 5-foot container in the SAA identified as SA-2A and four 4-foot containers in the CAA adjacent to Building 139. The containers were not marked or labeled with accumulation start dates, and the Respondent failed to utilize any other method which clearly demonstrated the length of time those containers were accumulated at the Facility. The EPA therefore alleges that the Respondent violated S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], by failing to demonstrate the length of time that universal waste was accumulated from the date that the universal waste became a waste or was received.

VI. STIPULATIONS

75. The issuance of this CAFO simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).
76. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), the Respondent:
 - a. admits that the EPA has jurisdiction over the subject matter alleged in this CAFO;
 - b. neither admits nor denies the factual allegations set forth in Section IV (Findings of Facts) of this CAFO;
 - c. consents to the assessment of a civil penalty as stated below;
 - d. consents to the conditions specified in this CAFO;
 - e. waives any right to contest the allegations set forth in Section V (Alleged Violations) of this CAFO; and
 - f. waives its rights to appeal the Final Order accompanying this CAFO.
77. For the purpose of this proceeding, the Respondent:
 - a. agrees that, except as set forth in Paragraphs 3 and 76.b, this CAFO states a claim upon which relief may be granted against the Respondent;
 - b. acknowledges that this CAFO constitutes an enforcement action for purposes of considering the Respondent's compliance history in any subsequent enforcement actions;

- c. waives any and all remedies, claims for relief, and otherwise available rights to judicial or administrative review that the Respondent may have with respect to any issue of fact or law set forth in this CAFO, including any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706;
 - d. waives any rights it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to compel compliance with the CAFO, and to seek an additional penalty for such noncompliance, and agrees that federal law shall govern in any such civil action;
 - e. 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 CAFO;
 - f. waives any rights or defenses that the 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 Consent Agreement; and
 - g. agrees to comply with the terms of this CAFO.
78. By executing this CAFO, the Respondent certifies to the best of its knowledge that the Respondent is currently in compliance with all relevant requirements of the SCHWMA, S.C. Code Ann. § 44-56-10 to 44-56-840, the SCHWMR, S.C. Code Ann. Regs. 61-79.260-270 and 273, and the Act and its implementing regulations, and that all violations alleged herein, which are neither admitted nor denied, have been corrected.
79. In accordance with 40 C.F.R. § 22.5, the individuals named in the Certificate of Service are authorized to receive service related to this proceeding and the Parties agree to receive service by electronic means.

VII. TERMS OF PAYMENT

80. The Respondent consents to the payment of a civil penalty, which was calculated in accordance with the Act, in the amount of **THREE HUNDRED FIFTY-THREE THOUSAND FIVE HUNDRED FIFTY-SEVEN DOLLARS (\$353,557.00)**, which is to be paid within 30 days of the Effective Date of this CAFO.
81. The Respondent shall pay the civil penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the following EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions, see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>. In addition, the Respondent shall identify every payment with the Respondent's name and the docket number of this CAFO, Docket No. **RCRA-04-2026-4003(b)**.

82. The Respondent shall send proof of payment, within 24 hours of payment of the civil penalty, to:

Regional Hearing Clerk
R4_Regional_Hearing_Clerk@epa.gov

and

George McBroom,
RCRA Enforcement Section
Enforcement and Compliance Assurance Division
mcbroom.george@epa.gov

and

U.S. Environmental Protection Agency
Cincinnati Finance Center
CINWD_AcctsReceivable@epa.gov

83. "Proof of payment" means, as applicable, confirmation of credit card or debit card payment, confirmation of wire or ACH transfer, and any other information required to demonstrate that payment has been made according to EPA requirements, in the amount due, and identified with the Respondent's name and Docket No. **RCRA-04-2026-4003(b)**.
84. 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 and 13.12, if the Respondent fails to timely pay the full amount of the civil penalty per this CAFO, the EPA is authorized to recover, in addition to the amount of the unpaid civil penalty, the following amounts:
- a. Interest. Interest will begin to accrue on the civil penalty from the Effective Date of this CAFO. If the civil penalty is paid in full within 30 days, interest accrued is waived. However, if the civil penalty is not paid in full within 30 days, interest will continue to accrue until any unpaid portion of the civil penalty, as well as any accrued 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 Internal Revenue Service (IRS) large corporate underpayment rate, as any lower rate would fail to provide the Respondent adequate incentive for timely payment;
 - b. Handling Charges. The Respondent will be assessed a monthly charge to cover the EPA's costs of processing and handling overdue debts. If the Respondent fails to pay the civil penalty in accordance with this CAFO, the EPA will assess a charge to cover the costs of handling any unpaid amounts for the first 30-day period after the Effective Date. Additional handling charges will be assessed every 30 days, or any portion thereof, until the unpaid portion of the civil penalty as well as any accrued interest, penalties, and other charges are paid in full.

- c. Late Payment Penalty. A late payment penalty of 6 percent (6%) per annum will be assessed monthly on all debts, including any unpaid portion of the civil penalty, interest, penalties and other charges, that remain delinquent more than 90 days. Any such amounts will accrue from the date of delinquency.
85. 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 civil penalty amount.
86. Late Penalty Actions. In addition to the amounts described in Paragraph 84, if the Respondent fails to timely pay any portion of the civil penalty, interest, or other charges and penalties per this CAFO, the EPA may take additional actions. Such actions the EPA may take include, but are not limited to, the following:
- a. refer the debt to a credit reporting agency or a collection agency (*see* 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 IRS for offset against income tax refunds (*see* 40 C.F.R. Part 13, Subparts C and H);
 - c. suspend or revoke the Respondent's licenses or other privileges, or suspend or disqualify the Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds (*see* 40 C.F.R. § 13.17); and/or
 - d. refer the matter to the Department of Justice as provided in 40 C.F.R. § 13.33. In any such judicial action, the validity, amount, and appropriateness of the penalty and of this CAFO shall not be subject to review.
87. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this CAFO shall not be deductible for purposes of federal taxes.
88. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, EPA is required to send a completed Form 1098-F ("Fines, Penalties, and Other Amounts") to the IRS annually with respect to any court order and settlement agreement (including administrative settlements), that requires a payor to pay an aggregate amount that the EPA reasonably believes will be equal to, or in excess of, \$50,000 for the payor's violation of any law or the investigation or inquiry into the payor's potential violation of any law, including amounts paid for "restitution or remediation of property" or to come "into compliance with a law." The EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (for example, a copy of Form 1098-F). In order to provide the EPA with sufficient information to enable it to fulfill these obligations, the EPA herein requires, and the Respondent herein agrees, that:

- a. The Respondent shall complete a Form W-9 ("Request for Taxpayer Identification Number and Certification"), which is available at <https://www.irs.gov/pub/irs-pdf/fw9.pdf>;
- b. The Respondent shall therein certify that its completed Form W-9 includes the Respondent's correct Tax Identification Number (TIN) or that the Respondent has applied and is waiting for issuance of a TIN;
- c. The Respondent shall email its completed Form W-9 to the EPA's Cincinnati Finance Center Region 4 contact, Jessica Henderson (Henderson.Jessica@epa.gov), on or before the date that the Respondent's penalty payment is due, pursuant to Paragraph 80 of this CAFO, and the EPA recommends encrypting Form W-9 email correspondence; and
- d. In the event that the Respondent has certified in its completed Form W-9 that it has applied for a TIN and that TIN has not been issued to the Respondent by the date that its penalty payment is due, then the Respondent, using the same email address identified in the preceding subparagraph, shall further:
 - i. notify the EPA's Cincinnati Finance Center of this fact, via email, by the date that the Respondent's penalty payment is due; and
 - ii. provide the EPA's Cincinnati Finance Center with the Respondent's TIN, via email, within 5 days of the Respondent's issuance and receipt of the TIN.

89. Failure to comply with providing Form W-9 or TIN may subject the Respondent to a penalty. See 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1.

VIII. EFFECT OF CAFO

- 90. In accordance with 40 C.F.R. § 22.18(c), the Respondent's full compliance with this CAFO shall only resolve the Respondent's liability for federal civil penalties for the violations and facts specifically alleged above.
- 91. Full payment of the civil penalty, as provided in Section VII (Terms of Payment) shall satisfy the requirements of this CAFO; but shall not in any case affect the right of the EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law. 40 C.F.R. § 22.18(c).
- 92. Any violation of this CAFO may result in a civil penalty for each day of continued noncompliance with the CAFO and/or the suspension or revocation of any federal or state permit issued to the violator, as provided in Section 3008(c) of the Act, 42 U.S.C § 6928(c).
- 93. Nothing in this CAFO shall relieve the 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 the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be

construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit, except as expressly provided herein.

94. Nothing herein shall be construed to limit the power of the EPA to undertake any action against the Respondent or any person in response to conditions that may present an imminent and substantial endangerment as provided under the Act.
95. The terms, conditions and compliance 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.
96. The provisions of this CAFO shall apply to and be binding upon the Respondent and its successors and assigns. The Respondent shall direct its officers, directors, employees, agents, trustees, and authorized representatives to comply with the provisions of this CAFO, as appropriate.
97. 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 the Respondent's obligations and responsibilities under this CAFO.
98. By signing this Consent Agreement, the Respondent acknowledges that this CAFO will be available to the public and agrees that this CAFO does not contain any confidential business information or personally identifiable information.
99. By signing this Consent Agreement, the Complainant and the undersigned representative of the Respondent each certify that each person is fully authorized to execute and enter into the terms and conditions of this CAFO and has the legal capacity to bind the Party represented by that person to this CAFO.
100. By signing this Consent Agreement, both Parties agree that each Party's obligations under this CAFO constitute sufficient consideration for the other Party's obligations.
101. By signing this Consent Agreement, the Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and continues to be, true, accurate, and complete for each such submission, response, and statement. The 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.
102. The EPA also reserves the right to revoke this CAFO and settlement penalty if and to the extent that the EPA finds, after signing this CAFO, that any information provided by the Respondent was materially false or inaccurate at the time such information was provided to the EPA. If such false or inaccurate material was provided, the EPA reserves the right to assess and collect any and all civil penalties for any violation described herein. The EPA shall give the Respondent notice of its intent to revoke, which shall not be effective until received by the Respondent in writing.

103. Unless specifically stated otherwise in this CAFO, each Party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.
104. It is the intent of the Parties that the provisions of this CAFO are severable. If any provision or authority of this CAFO or the application of this CAFO 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 CAFO shall remain in force and shall not be affected thereby.

IX. EFFECTIVE DATE

105. 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.

[Remainder of Page Intentionally Left Blank

the Complainant and the Respondent will Each Sign on Separate Pages.]

The foregoing Consent Agreement *In the Matter of Century Aluminum of South Carolina, Inc.*, Docket No. **RCRA-04-2026-4003(b)**, is Hereby Stipulated, Agreed, and Approved for Entry.

FOR RESPONDENT:


Signature _____ Date 09/21/2026
Printed Name: John DeZee
Title: President and Secretary
Address: 1 S. Wacker Dr., Suite 1000,
Chicago, IL 60606

The foregoing Consent Agreement *In the Matter of Century Aluminum of South Carolina, Inc.*, Docket No. **RCRA-04-2026-4003(b)**, is Hereby Stipulated, Agreed, and Approved for Entry.

FOR COMPLAINANT:

KERIEMA
NEWMAN

 Digitally signed by KERIEMA
NEWMAN
Date: 2026.09.23 12:51:09 -04'00'

Keriema S. Newman, Director
Enforcement & Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

In the Matter of:

Century Aluminum of South Carolina, Inc.
3575 Highway 52
Goose Creek, South Carolina 29445
EPA ID No.: **SCD097366165**

Respondent.

Docket No. **RCRA-04-2026-4003(b)**

Proceeding Under Section 3008(a) of the
Resource Conservation and Recovery Act,
42 U.S.C. § 6928(a)

FINAL ORDER

The Regional Judicial Officer is authorized to ratify this Consent Agreement which memorializes a settlement between the Complainant and the Respondent. 40 C.F.R. §§ 22.4(b) and 22.18(b)(3). The foregoing Consent Agreement is, therefore, 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 Final Order disposes of this matter pursuant to 40 C.F.R. §§ 22.18 and 22.31.

BEING AGREED, IT IS SO ORDERED.

MICHELE
WETHERINGTON

Digitally signed by
MICHELE WETHERINGTON
Date: 2026.09.24 14:47:56
-04'00'

Regional Judicial Officer

CERTIFICATE OF SERVICE

I certify that the foregoing Consent Agreement and Final Order, *In the Matter of Century Aluminum of South Carolina, Inc.*, Docket No. **RCRA-04-2026-4003(b)**, were filed and copies of the same were emailed to the Parties as indicated below.

Via email to all Parties at the following email addresses:

Respondent:

Madison Healey
Environmental, Health, Safety and Quality Manager
Century Aluminum, Mt. Holly
Madison.Healey@centuryaluminum.com
(251) 424-5130

Christopher Goddard
Global Environmental Compliance & Policy Assurance Coordinator
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**SHANNON
RICHARDSON**

Digitally signed by
SHANNON
RICHARDSON
Date: 2026.09.24
15:40:38 -04'00'

Regional Hearing Clerk
R4_Regional_Hearing_Clerk@epa.gov