Phoenix Goodyear
31214 (Litchfield)

84-02

Final Corp.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9

In the Matter of GOODYEAR AEROSPACE CORPORATION, (LITCHFIELD PARK, ARIZONA), Respondent. Proceeding Under Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S. C. §9606(a)) and Section 3013 of the Resource Conservation and Recovery Act (42 U.S.C. §6934)	)	ORDER Docket No. 84-02

JURISDICTION

The following Order is issued on this date to Goodyear Aerospace Corporation, Arizona Division, Litchfield Park, Arizona (hereinafter referred to as Respondent), pursuant to the authority vested in the President of the United States by §106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. §9601 et seq., delegated to the Administrator of the United States Environmental Protection Agency (EPA) by Executive Order Number 12316 (August 20, 1981, 46 FR 42237), and redelegated to the

Director, Toxics and Waste Management Division, EPA, Region 9. The following Order is also issued pursuant to the authority vested in the Administrator under §3013 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C §6934, and redelegated to the Director, Toxics and Waste Management Division, EPA, Region 9. Notice of the issuance of this Order has been given to the State of Arizona.

FINDINGS OF FACT

1. Respondent is current owner and operator of a facility located at 101 S. Litchfield Road, Litchfield Park, Arizona (hereinafter "facility").
2. Respondent has engaged in the use, generation, treatment, storage and disposal of hazardous substances and hazardous wastes as defined by CERCLA and RCRA.
3. Respondent has used significant quantities of halogenated and non-halogenated solvents including, but not limited to, trichloroethylene (hereinafter referred to as TCE) since it began operations in 1942.
4. On August 18, 1980, Respondent submitted to EPA a Notification of Hazardous Waste Activity Pursuant to §3010(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6930. In that document, Respondent reported that it generates, treats, stores, or disposes of the following wastes designated by the EPA Hazardous Waste Numbers:

F001 spent halogenated solvents
F003 spent non-halogenated solvents
F005 spent non-halogenated solvents
U002 acetone
U013 asbestos

U031 n-butyl alcohol
U037 chlorobenzene
U108 1,4-dioxane
U112 ethyl acetate
U121 fluorotrichloromethane
U122 formaldehyde
U123 formic acid
U134 hydrofluoric acid
U140 isobutyl alcohol
U160 methyl ethyl ketone peroxide
U161 methyl isobutyl ketone
U162 methyl methacrylate
U186 1,3-pentadiene
U188 phenol
U197 quinones
U213 tetrahydrofuran
U069 di-n-butyl phthalate
U075 dichlorodifluoromethane
U080 dichloromethane
U147 maleic anhydride
U151 mercury
U154 methanol
U159 methyl ethyl ketone
U226 1,1,1-trichloroethane
U228 trichloroethylene (TCE)
U229 trichlorofluoromethane
U239 xylene

5. On November 17, 1980, Respondent submitted a RCRA Hazardous Waste Part A Permit Application for Interim Status. In the application, Respondent reported storing or treating the following wastes designated by the EPA Hazardous Waste Numbers:

U002 acetone
U031 n-butyl alcohol
U075 dichlorodifluoromethane
U122 formaldehyde
U140 isobutyl alcohol
U154 methanol
U159 methyl ethyl ketone
U160 methyl ethyle ketone peroxide
U220 toluene
U223 toluene disocyanate
U226 1,1,1-trichloroethane
D001 ignitable or oxidizing waste
D007 chromium

The application did not list TCE (hazardous waste number U228), as previously reported two months earlier.

6. Respondent has possessed, since October 27, 1978, a National Pollutant Discharge Elimination System (NPDES) Permit (Number AZ0000108). Effluent from Respondent's three NPDES Outfalls flows through the main ditch running through the PhoenixLitchfield Airport and then into an unlined pond off the airport property. As a result, Respondent's effluent may inflitrate into the ground.

7. According to Respondent's NPDES Permit, discharges from Outfall 001 are to contain only Non-Contact Process Cooling Water, Storm Water runoff, and Boiler Blowdown. Discharges from Outfall 002, by permit, are to contain only Non-Contact Process Cooling Water, Storm Water runoff, and Chrome Treatment Plant Waste.

8. In May, 1981, Respondent reapplied for its NPDES Permit. As part of the reapplication process, Respondent sampled its NPDES Outfalls. The sample taken from Outfall 001 contained 169 parts per billion (ppb) of 1,1,1-tricholoro-ethane (TCA) and 47 ppb of TCE. Respondent later re-sampled the Outfall. The latter sample contained 8 ppb of TCA, but was not analyzed for TCE.

9. During 1983 and 1984, the Arizona Department of Health Services and Respondent sampled water from Respondent's storm drains and NPDES outfalls. The sample results are listed below:

Goodyear Aerospace NPDES Outfall 001

Date Sampled	Organization Sampling	Contaminant	Concentration (in ppb)
6/83	GAC	TCE	169.
6/83	GAC	TCE	47.

5/18/83	ADHS	TCE	3.0
6/15/83	ADHS	TCE	5.1
12/22/83	GAC	TCE	51.
12/22/83	GAC	TCE	45.
1/12/84*	GAC	TCE	880.
1/12/84*	GAC	TCE	43.0
1/12/84*	GAC	TCE	15.6
1/19/84*	GAC	TCE	36.1
1/19/84*	GAC	TCE	5.22
1/19/84*	GAC	TCE	226.
1/19/84*	GAC	TCE	5.61
1/24/84*	GAC	TCE	520.
2/09/84*	GAC	TCE	34.8
2/09/84*	GAC	TCE	127.
2/09/84*	GAC	TCE	63.9

*Sample taken upstream of the designated NPDES sampling point.

Goodyear Aerospace NPDES Outfall 002

Date Sampled	Organization Sampling	Contaminant	Concentration (in ppb)
5/18/83	ADHS	TCE	3.1
6/15/83	ADHS	TCE	0.9

10. On August 27, 1982, Respondent submitted information to EPA in response to EPA's request for information pursuant to Section 3007(a) of RCRA, 42 U.S.C. §6927, and Section 104(e) of CERCLA, 42 U.S.C. §9604(e). Respondent stated the following:

A. TCE was used extensively as a degreaser before 1974. After TCE use was discontinued in 1974, 1,1,1-trichoroethane (TCA) was substituted for TCE.

B. 23 55-gallon drums of waste TCE were stored at Respondent's facility for six years from 1973 to August 5, 1980, at which time the drums were removed from the facility by Southwest Solvents.

C. Waste storage at the Respondent's facility consists of tanks containing chromium sludge from their chromium treatment facility and small quantities of nickel, lead, tin and cooper. Other hazardous wastes stored at the facility include chlorinated solvents.

D. In 1971, an unknown quantity of solvents was disposed of in one of the sludge drying beds. Respondent said that disposal of TCE in the drying beds was unlikely.

E. Between the early 1970's and 1980, Respondent disposed of chromium-bearing sludge from the chromium treatment plant in drying beds located on the facility.

11. Respondent did not submit information documenting its waste disposal practices for the first 25 years of its operation although such information was requested pursuant to Section 3007 of RCRA in the letter sent to Respondent on July 23, 1982.

12. Respondent's wells #1, #2, #3, and #4 are located on Respondent's facility. Between February 1979 and January 24, 1984, EPA, the Arizona Department of Health Services, and Respondent sampled Respondent's wells #2, #3, and #4. The results of those sampling efforts are listed below:

Goodyear Aerospace Corporation Well #2

Date Sampled	Organization Sampling	Contaminant	Concentration (in ppb)
12/9/81	ADHS	TCE	2.1
3/24/82	GAC	TCE	3.6
9/2/82	EPA	TCE	7.3
10/27/82	GAC	TCE	3.9
5/9/83	GAC	TCE	9.8
6/15/83	GAC	TCE	2.7
12/9/81	GAC	Chromium	210.
1/5/82	GAC	Chromium	130.

3/31/82	GAC	Chromium	45.
9/2/82	EPA	Chromium	30.
10/14/82	GAC	Chromium	36.
6/28/83	ADHS	Chromium	51.

Goodyear Aerospace Corporation Well #3

Date Sampled	Organization Sampling	Contaminant	Concentration (in ppb)
3/23/82	ADHS	TCE	33.1
3/24/82	ADHS	TCE	49.9
7/15/82	GAC	TCE	14.7
7/30/82	GAC	TCE	4.63
8/6/82	GAC	TCE	4.30
9/2/83	EPA	TCE	9.5
10/27/82	GAC	TCE	9.3
6/15/83	GAC	TCE	14.0
6/15/83	GAC	TCE	7.3
9/2/82	EPA	Chromium	50.
10/14/82	GAC	Chromium	64.
6/28/83	ADHS	Chromium	81.

Goodyear Aerospace Corporation Well #4

Date Sampled	Organization Sampling	Contaminant	Concentration (in ppb)
12/9/81	ADHS	TCE	2.6
6/15/82	ADHS	TCE	6.6
6/15/83	GAC	TCE	12.0
6/15/83	GAC	TCE	6.6
7/15/83	GAC	TCE	5.8
1/16/84	GAC	TCE	5.9
1/19/84	GAC	TCE	6.19
1/24/84	GAC	TCE	6.46
2/79	GAC	Chromium	15.
3/82	GAC	Chromium	18.
9/2/83	GAC	Chromium	10.
10/14/82	GAC	Chromium	12.
6/28/83	ADHS	Chromium	16.

13. Between November, 1981 and April, 1982, the Arizona Department of Health Services sampled the Phoenix-Litchfield Airport well #3, located immediately adjacent to Respondent's facility. The sampling dates and the concentrations of contaminants found in the samples

are listed below:

Phoenix-Litchfield Airport Well #3

Date Sampled	Contaminant	Concentration (in ppb)
11/24/81	TCE	47.3
12/81	TCE	116.
03/17/82	TCE	576.9
03/17/82	1,1-dichloroethylene	4.76
03/17/82	trans 1,2-dichloroethylene	21.3
03/17/82	chloroform	4.4
03/17/82	1,1 dichloroethane	21.4
03/17/82	carbon tetrachloride	4.22
03/17/82	tetrachloroethylene	5.
04/20/82	TCE	461.1
04/20/82	1,1 dichloroethylene	0.49
04/20/82	1,1 dichloroethane	0.48
04/20/82	trans 1,2-dichloroethylene	5.47
04/20/82	chloroform	5.0

14. On February 16 and 17, 1984, EPA inspected Respondent's facility pursuant to an Administrative Search Warrant from the U.S. District Court. A records review was conducted as part of the search. Of the documents EPA reviewed, an inter-office memo dated January 22, 1973 from T.W. Heim to G.R. Phillips regarding solvent disposal, stated:

> Waste solvents have been disposed of during the past several months by periodically pumping them into an open pit south of Building #5 and allowing them to evaporate. This method of disposal was considered a temporary measure at the time it was started and is not satisfactory for the following reasons:
>
> 1. The pit is approximately 20 x 50 ft. and constitutes a fire hazard when it is filled with solvent.
>
> 2. After a period of time the solvent may seep into the ground and contaminate the water table.

According to the memo, the following solvents were disposed of in the pit:

Methyl Ethyl Ketone
Toluene

Alcohol
Naphtha
Acetone
Xylene
Trichoroethylene
Methyl Isobutyl Ketone

15. During their February 16 and 17, 1984 inspection, EPA Field Inspectors located two surface impoundments in the southeast quadrant of Respondent's facility. The irregularly shaped impoundments are approximately six feet in diameter. The depth is unknown. Respondent's representatives stated that the impoundments are used for disposing polishing compound waste from its plastics shop. However, the chemical composition of these substances is unknown.

16. During their February 16 and 17, 1984 inspection, EPA officials spoke with Mr. Randall Clark, Respondent's Environmental Coordinator. Mr. Clark stated that the TCE found in Respondent's NPDES discharge was due to TCE-laden sediment in the drain pipes which convey liquid to the NPDES Outfalls.

17. On February 16 and 17, 1984, EPA Field Inspectors sampled sediment from Respondent's drain pipes. Pertinent analytic results for a portion of the drain pipe sediment samples are listed below:

Sample #	Contaminant	Concentration
Y-4145	TCE	20 ppb
Y-4102	TCE	540 ppb
Y-4119	TCE	3,700,000 ppb
	methylene chloride	250,000 ppb

18. TCE is used primarily as a metal degreasing agent and is slightly soluble in water. TCE is an anesthetic

which depresses the central nervous system. TCE has been demonstrated to cause cancer in animals and to be mutagenic in certain laboratory tests. Short term exposure to TCE has been reported to produce liver and kidney damage and central nervous system disturbances in mammals, including humans.

19. EPA has determined in its ambient water quality criteria that 2.7 parts per billion (ppb) of TCE would be expected to produce one additional case of cancer in a population of 1,000,000 [F.R./Vol. 45, No. 231/November 28, 1980/p. 79341]. As described in paragraphs 12 and 13, three of Respondent's wells, and an off-site well immediately adjacent to Respondent's facility have all been found to contain TCE in concentrations well above 2.7 ppb.

20. The State of Arizona has established an action level of 5 ppb for TCE found in drinking water. Using this guideline, the State has requested the closure of drinking water wells in which the concentration of TCE exceeds 5 ppb.

21. Chromium may be absorbed by ingestion, inhalation and through the skin. Certain chromium compounds have been found to cause cancer in humans and have been shown to be mutagenic in animal cells. Some chromium compounds can cause liver and kidney damage. EPA has established a Maximum Contaminant Level (MCL) for chromium in drinking water of 50 ppb.

22. Halogenated and non-halogenated spent solvents, including TCE and methylene chloride, and chromium-bearing sludge are hazardous wastes as defined by §1004(5) of RCRA, 42 U.S.C. §6903(5) and are listed as hazardous wastes at 40 CFR §261.31. Chromium-bearing sludge, TCE, methylene chloride, and spent

halogenated and non-halogenated solvents are also hazardous substances as defined by §101(14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. §9601(14).

23. The aquifer system which is tapped by Respondent's contaminated wells is the primary source of drinking water for approximately 5250 people in the Goodyear-Avondale area.

DETERMINATION

Based upon the foregoing Findings of Fact, the Director, Toxics and Waste Management Division, EPA, Region 9 has determined that due to past, and possibly on-going, releases of hazardous substances and hazardous wastes from Respondent's facility there may be an imminent and substantial endangerment to the public health or welfare or the environment, and that such releases may present a substantial hazard to human health or the environment.

EPA has further determined that Respondent is a current owner/operator responsible for conducting the actions ordered herein, which are necessary to ascertain the nature and extent of the hazard and to protect public health and the environment.

ORDER

Based upon the foregoing Determinations and Findings of Fact, Respondent is hereby ordered and directed, pursuant to §106(a) of CERCLA, 42 U.S.C. §9601 et seq., and §3013 of RCRA, as amended, 42 U.S.C. 6934, to (I) cease the unauthorized release of TCE and other hazardous substances, remove all contaminated sediment from drain pipes feeding into Respondent's NPDES outfalls, and (II) prepare and submit to EPA for approval, within 30 days of the effective date of this Order, a written

proposal (hereinafter referred to as Proposal) to conduct a comprehensive monitoring, testing, analysis, and reporting program designed to identify the extent of environmental contamination and support subsequent remedial actions. Specifically:

I. A. Respondent shall immediately cease the unauthorized release of TCE and other hazardous substances from Respondent's facility. Respondent shall notify EPA in writing within 5 days of the effective date of this Order of actions taken to prevent the unauthorized release of hazardous substances.

B. 1. Respondent shall, upon the effective date of this Order, daily sample effluent from the NPDES outfalls at the designated NPDES sampling points, unless otherwise directed by EPA.

2. Each effluent sample shall, at a minimum, be analyzed for volatile organic priority pollutant compounds. All samples collected on the first day of sample collection and all samples collected every fifth day thereafter shall be analyzed for all priority pollutants. EPA may alter the sample analysis requirements of this paragraph at any time.

3. Respondent shall submit to EPA the results of the sample analyses within 20 days of sample collection.

4. Upon a determination by EPA that a threat of release of hazardous substances no longer exists, EPA may modify the sampling requirements of Part I.B. of this Order.

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C. 1. Within 5 days of the effective date of this Order, Respondent shall submit to EPA for approval, a plan to sample sediment in Respondent's drain pipes. The plan shall be aimed at identifying the extent of sediment contamination and shall specify the number and location of sediment sampling points. All samples shall be analyzed for all priority pollutants.

2. Respondent shall conduct and complete sampling within 5 days of receiving EPA approval of the sampling plan.

3. Within 5 days of receipt of sediment sample analytic results, Respondent shall remove all contaminated sediment from Respondent's drain pipes. All sediment removal work shall be subject to the direction of an EPA On-Scene Coordinator or an EPA-designated on-site representative.

4. Sample analytic results shall be submitted to EPA within 20 days of sample collection.

5. Respondent shall submit to EPA, within 20 days of sediment removal, a summary of the volume of sediment removed, the locations of excavation, and the locations of sediment disposal.

D. All samples collected pursuant to Part I of this Order shall be collected, preserved, packaged, shipped, handled, and prepared for analysis according to the protocols specified in Appendix A of this Order. All sample handling pursuant to this Order shall be performed

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according to the chain of custody procedures described in Appendix B of this Order. All samples analyzed pursuant to this Order shall be analyzed according to EPA-approved analytical methods.

E. Respondent shall submit to EPA, upon request, splits of all samples taken pursuant to Part I of this Order. All split samples shall be subject to the protocols specified in Part I of this Order, including chain of custody procedures.

F. On each day of effluent sample collection, Respondent shall collect at least one duplicate sample. On each day of sediment sample collection, Respondent shall collect a minimum of one duplicate sample, or 10% of the total number of samples, whichever results in the greater number of duplicate samples. Duplicate samples shall be analyzed exactly as the original sample and shall be subject to all protocols specified in Part I of this Order, including chain of custody procedures.

G. Respondent shall ensure proper worker safety to prevent worker exposure to hazardous substances.

H. EPA shall designate an On-Scene Coordinator who shall have the authority vested by 40 CFR §300 et seq., published at 47 FR Part 31180 (July 16, 1982).

II. In addition to monitoring, testing, analysis, and reporting, Respondent's Proposal under Part II of this Order shall identify and determine the nature and extent of organic and inorganic chemical contamination of surface soils, subsurface soils, surface water, and groundwater both within and beyond

Respondent's facility. The Proposal shall include provisions for gaining access to and obtaining samples from adjacent properties, where appropriate.

A. The Proposal shall include the following:

1. A sufficient number of sample locations in order to define the extent of the contamination, to provide the data required to propose clean-up alternatives, and to determine the physical characteristics of each major subsurface lithologic unit beneath Respondent's facility and the surrounding area including, but not limited to:

   a. transmissivity
   b. storativity
   c. hydraulic conductivity
   d. saturated thickness
   e. porosity
   f. geologic description
   g. lithology
   h. specific yield
   i. specific storage;

2. A plan to characterize the hydrogeology and hyrology on and beneath Respondent's facility and the affected surrounding area, sufficient to identify the direction and rate of contaminant transport, the volume of contaminated surface and groundwater, and the exent to which contaminants may have moved beyond Respondent's facility via surface or subsurface transport;

3. A plan to determine the vertical and areal distribution of contaminants in both the saturated and unsaturated zones;

4. A plan for sampling soil at the location of any past or present drying beds, surface impoundments, or other storage, disposal, or spill sites, including the soil beneath Respondent's current waste storage area, the soil beneath Respondent's "clean line", and the two surface impoundments presently used to dispose of polishing compound waste. Such plan shall include enough samples to determine the extent to which any past or present drying beds, surface impoundments, or other storage, disposal, or spill sites may have permitted infiltration of contaminants into the subsurface environment;

5. Sampling protocols for surface water, standing liquid, groundwater, sediment, surface soil, and subsurface soil;

6. Analytical and quality control protocols for the sampling and analysis program, including:

   a. adequate sample identification;

   b. sample preservation techniques;

   c. chain of custody;

   d. use of EPA-approved analytical methods;

   e. identification of person(s) conducting the sampling and analysis; and

   f. photographic documentation of sample collection;

7. A plan for retaining, identifying, maintaining, and submitting to EPA, upon request, splits of all samples taken pursuant to this Order. Identification and maintenance of all split samples shall be in accordance with the protocols specified above (6a, 6b, and 6c).

8. Precautions which will be taken to insure the health and welfare of the individuals associated with the field work and laboratory analyses.

9. Precautions which will be taken during sampling to insure the health and welfare of the surrounding community.

B. The Proposal ordered in Part II of this order must be submitted by Respondent to Stephen A. Johnson, Environmental Protection Agency, at the address listed below, within thirty days of the date of this Order. The Proposal shall be subject to review, modification and approval by EPA.

C. Respondent shall complete all work ordered in Part II of this Order, including sample analyses, within 120 days from receipt of EPA approval of the Proposal.

D. The above work shall be conducted consistent with the EPA Workplan for the Litchfield Airport Area Remedial Investigation and Feasibility Study (hereinafter "Workplan") prepared by CH_2M Hill under work assignment number 73-9L19.0. Nothing in this Order shall be construed so as to imply that Respondent is ordered to perform only that work which is specified in the Workplan.

Both Part I and Part II of this Order shall be subject to the following guidelines:

1. It is the responsibility of Respondent to obtain access to and use of any off-site areas. Respondent shall assume full responsibility for any claims arising from the activities conducted by Respondent or its representatives or consultants on third-party property in connection with this Order. Respondent will provide access to the site for EPA employees, contractors, or consultants at all reasonable times and will permit such persons to be present and move freely in the area where any work is being conducted pursuant to this Order.
2. All data, unless otherwise exempted by EPA, shall be reported in a STORET compatible format. STORET is an acronym used to identify the computerized data base system maintained by EPA for the STORage and RETrieval of data relating to the quality of the waterways within, and contiguous to, the United States. This format requires that each sample collected be properly identified as to sampling location, sampling date and time, sample depth and media sampled (e.g., water or sediment). All parametric observations shall be associated with the proper 5 digit STORET parameter code and reported in proper units. Detection limits are to be specified where applicable.
3. Respondent shall provide EPA with copies of all charts, maps, letters, memoranda, invoices, shipping manifests or other records or documents relevant to the subject

matter in this Order as requested by EPA or which are required by to be provided to EPA by RCRA, CERCLA, or any other applicable law.

4. Respondent shall submit to EPA monthly reports describing activities performed during that month pursuant to this Order. including, but not limited to, a description of any well drilling, soil boring, sample collection, sample analysis, water level measurement, and engineering or geologic analysis.

5. Respondent shall submit to EPA a final written report describing the data collected and findings made pursuant to this Order within 180 days after receipt of EPA approval of the Proposal.

EFFECTIVE DATE -- OPPORTUNITY TO CONFER

Except as otherwise provided below, this Order is effective immediately upon the date of receipt by Respondent. All times for performance of response activities shall be calculated from that date.

Under the provisions of CERCLA, Respondent may request a conference to be held within seven (7) calendar days after receipt of this Order to discuss Part I of the Order, its applicability, the correctness of any factual determinations upon which the Order is based, the appropriateness of any action which Respondent is ordered hereby to take, and any other relevant and material issue. If Respondent requests a conference, Part I of this Order will not become effective until the expiration of the said seven day period.

Under the provisions of RCRA, Respondent may confer with EPA regarding Part II of this Order prior to submittal of the Proposal.

Any objection, defense or contention which Respondent may make should be in writing, and signed and forwarded to the contact person named below on or before the date on which you are required to submit the Proposal. The opportunity to confer does not alter the requirement for submittal of the Proposal within thirty days of the effective date of this Order.

At any conference held pursuant to Respondent's request, Respondent may appear in person and with counsel or other representatives for the purpose of presenting any objections, defenses or contentions which Respondent may have regarding this Order.

PENALTIES FOR NON-COMPLIANCE

You are advised that willful violation or failure or refusal to comply with Part I of this Order, or any portion hereof, may subject you to a civil penalty of not more than $5,000.00 for each day in which violation occurs or such failure to comply continues in accordance with §106(b) of CERCLA. Failure to comply with Part I of this Order, or any portion hereof, without sufficient cause, may also subject you to liability for punitive damages in the amount of three times the total of all costs incurred by the government as a result of your failure to take proper action in accordance with §107(c)(3) of CERCLA.

In addition, you are advised that EPA may, in accordance with §3013(e) of RCRA, commence a civil action in a United States District Court if you fail or refuse to comply with Part I of this Order. Such Court shall have jurisdiction to require compliance with Part I of this Order and to assess civil penalties

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not to exceed $5000.00 per day for each day that failure or refusal to comply occurs.

It is so ordered on this 27th day of March, 1984.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BY: Harry Seraydarian
HARRY SERAYDARIAN
DIRECTOR, TOXICS AND WASTE MANAGEMENT DIVISION

Contact person:

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