

STATE OF CALIFORNIA  
ENVIRONMENTAL PROTECTION AGENCY  
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:

Docket HWCA 20114609

Castlerock Environmental, Inc.  
10040 Painter Ave,  
Santa Fe Springs, CA 90670  
CAL000343571

CONSENT ORDER

Respondent:

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Health and Safety Code  
Section 25187

1. INTRODUCTION

1.1. Parties. The California Department of Toxic Substances Control (Department) and Castlerock Environmental, Inc. (Respondent) enter into this Consent Order (Order) and agree as follows:

1.2. Site. Respondent handles, generates and/or manages hazardous waste at the following site: 10040 Painter Ave, Santa Fe Springs, CA 90670 (Site).

1.3. Inspection. The Department inspected the Site on May 14, 2012.

1.4. Authorization Status. The Respondent is registered to transport hazardous waste in the state of California in accordance with the provisions of Chapter 6.5 Division 20 of the Health and Safety Code and Title 22 of the California Code of Regulations, Division 4.5.

1.5. Jurisdiction. Health and Safety Code, section 25187, authorizes the Department to order action necessary to correct violations and to assess a penalty when the Department determines that any person has violated specified provisions of

the Health and Safety Code or any permit, rule, regulation, standard, or requirement issued or adopted pursuant thereto.

1.6. Full Settlement. This Order shall constitute full settlement of the violation alleged below. The Parties, and each of them, agree that this Order, and all of the terms contained herein, are fair, reasonable, and in the public interest. By agreeing to this Order, the Department does not waive any right to take other enforcement actions except as specifically provided in this Order.

1.7. Hearing. Respondent waives any and all rights to a hearing in this matter.

1.8. Admissions. Respondent admits the violations as alleged in Section 2 below.

## 2. VIOLATION ALLEGED

2.1. The Department alleges the following violation:

2.2. Respondent violated Health and Safety Code section 25201, subdivision (a), in that on or about April 26, 2010 and continuing through January 23, 2012, Respondent operated a storage facility without a permit.

To wit: Respondent held hazardous waste in excess of the ten days allotted under the Transfer Facility Exemption without a permit or grant of authorization from the Department.

## 3. SCHEDULE FOR COMPLIANCE

3.1. Respondent has corrected the violation cited above. Respondent shall operate hereafter in a manner that shall prevent recurrences of the violation cited herein.

3.2. Respondent shall make all payments at the time(s) and in accord with any

other conditions set forth in Section 5 (Penalty) below.

#### 4. OTHER PROVISIONS

4.1. Liability. Nothing in this Order shall constitute or be construed as a satisfaction or release from liability for any conditions or claims arising as a result of past, current, or future operations of Respondent, except as provided in this Order. Notwithstanding compliance with the terms of this Order, Respondent may be required to take such further actions as are necessary to protect public health or welfare or the environment.

4.2. Penalties for Noncompliance. Failure to comply with the terms of this Order may subject Respondent to costs, penalties and/or damages, as provided by Health and Safety Code, section 25188, and other applicable provisions of law.

4.3. Parties Bound. This Order shall apply to and be binding upon Respondent and its officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations, and upon the Department and any successor agency that may have responsibility for and jurisdiction over the subject matter of this Order.

4.4. Integration. This agreement constitutes the entire agreement between the parties and may not be amended, supplemented, or modified, except as provided in this Order.

#### 5. PENALTY

5.1. Respondent shall pay the Department a total penalty of \$10,000.00.

5.2. The penalty shall be paid in five (5) installments. The five installments in the amount of \$2,000.00 each are due and payable as follows: on May 15, 2013; June 15, 2013, July 15, 2013, August 15, 2013 and September 15, 2013. Any installment payment that is received by the Department more than 15 days after it is due will be subject to a \$250 penalty, such penalty shall be paid by Respondent no later than the due date of the next installment payment. If Respondent fails to make any payment timely as provided above, Respondent agrees to pay interest thereon at the rate established pursuant to Health and Safety Code section 25360.0. Respondent further agrees to pay all costs and attorney's fees incurred by the Department in pursuing the collection of any sums the payment of which becomes delinquent thereunder.

5.3. Respondent's check(s) shall be made payable to Department of Toxic Substances Control, shall identify the Respondent and Docket Number, as shown in the caption of this case, and shall be delivered to:

Department of Toxic Substances Control  
Accounting Office  
1001 I Street, 21st floor  
P. O. Box 806  
Sacramento, California 95812-0806

A photocopy of the check(s) shall be sent to:

Robert Kou, Unit Chief  
Enforcement and Emergency Response Division  
Department of Toxic Substances Control  
9211 Oakdale Avenue  
Chatsworth, California 91311

and

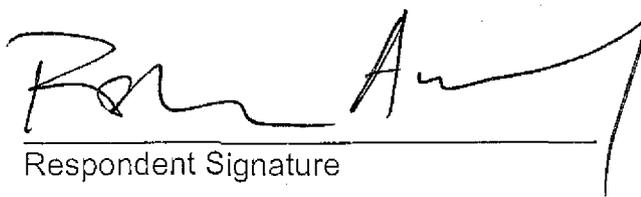
Debra Schwartz  
Office of Legal Affairs  
Department of Toxic Substances Control  
9211 Oakdale Avenue  
Chatsworth, California 91311

5.4. If Respondent fails to make payment as provided above, Respondent agrees to pay interest at the rate established pursuant to Health and Safety Code, section 25360.1, and to pay all costs incurred by the Department in pursuing collection including attorney's fees.

6. EFFECTIVE DATE

6.1. The effective date of this Order is the date it is signed by the Department.

Dated: 4/23/2013

  
Respondent Signature

Rami Awwad  
Print Name of Respondent

Dated: May 1 2013

  
Robert Kou, Unit Chief  
Chatsworth Branch  
Enforcement and Emergency Response  
Division  
Department of Toxic Substances Control