



Oregon

Kate Brown, Governor

Department of Environmental Quality
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May 4, 2022

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International Resources Management, Inc.
c/o Thomas R. Benke
The Environmental Compliance Organization, LLC
7133 N Lombard St
Portland, OR 97203

Re: Withdrawal of Amended Notice of Civil Penalty Assessment and Order
Case No. LQ/HW-NWR-2017-003

On January 3, 2018, the Department of Environmental Quality (DEQ) issued International Resources Management, Inc. (IRM) a Notice of Civil Penalty Assessment and Order in the above referenced case. On July 21, 2021, DEQ issued an Amended Notice of Civil Penalty Assessment and Order (the Amended Order).

DEQ hereby withdraws the Amended Order. DEQ failed to attach a civil penalty calculation exhibit to the Amended Order and therefore did not provide notice in accordance with the requirements of ORS 183.415. As a result, the Amended Order cannot be the basis for agency action.

DEQ's withdrawal of the Amended Order ends the proceedings in this case. DEQ is withdrawing the Amended Order solely because the Amended Order did not comply with ORS 183.415. DEQ notes that no Final Order will be issued in this case and that DEQ will continue to interpret and apply the law regarding hazardous waste manifest requirements as it did in this case. DEQ may take enforcement action in the future to address a similar new or ongoing violation.

If you have any questions, please contact DEQ Environmental Law Specialist Jeff Bachman at (503) 229-5950. You may call toll-free within Oregon at 1-800-452-4011, extension 5950.

Sincerely,

Kieran O'Donnell, Manager
Office of Compliance and Enforcement

International Resources Management, Inc.
LQ/HW-NWR-2017-003
Withdrawal of Order

Enclosure

cc: Business Office, DEQ
Audrey O'Brien, DEQ
Jeff Bachman, DEQ
Gary Vrooman, DOJ
Stephanie Caldera, EQC