

**STATE OF CONNECTICUT**

**V.**

**CHEAP AUTO RENTAL, LLC and**

**860 CAMPBELL AVE LLC**

**CONSENT ORDER No. WSWDH22001**

**Date Issued:** June 6, 2022

- A. With the agreement of Cheap Auto Rental, LLC (“Respondent Cheap Auto Rental”) and 860 Campbell Ave, LLC (“Respondent 860 Campbell Ave”) (collectively referred to as the “Respondents”), the Commissioner of Energy and Environmental Protection (the “Commissioner”) finds:
1. Respondent Cheap Auto Rental is a domestic limited liability company registered to do business in Connecticut with the Connecticut Secretary of the State.
  2. Respondent 860 Campbell Ave is a domestic limited liability company registered to do business in Connecticut with the Connecticut Secretary of the State.
  3. Respondents’ registered business address listed with the Connecticut Secretary of the State is 384 South Colony Road, Wallingford, Connecticut 06492.
  4. Respondent Cheap Auto Rental is or has engaged in the business of vehicle rental and repair which services, sells and rents used cars from adjoining locations: 384 South Colony Road (“Site A”) and 392 South Colony Road (“Site B”) (collectively referred to as the “Site”). Respondent 860 Campbell Ave is the owner of the Site.
  5. Respondent Cheap Auto Rental is or has been a generator of hazardous waste at the Site and has been assigned EPA Identification No. CTR000519777 by the U.S. Environmental Protection Agency.
  6. Based on an inspection conducted by the Department of Energy and Environmental Protection (the “Department”), Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division on March 24, 2021, Respondents:
    - a. Failed to determine whether each waste generated at the Site is a hazardous waste as required by Section 22a-449(c)-101(b)(2) of the Regulations of Connecticut State Agencies (“RCSA”), incorporating by reference Title 40 of the Code of Federal Regulations (“40 CFR”) 261.5(g)(l). Specifically, the Department found no evidence indicating hazardous waste determinations were made for the following (observed at Site A within the “Covered Fence Storage Area” of the parking area):

- i. one, 5-gallon unlabeled container with unknown contents was stored on the ground without an impervious base.
- ii. one unsealed garbage bag filled with oily absorbents that spilled onto the ground.
- b. Failed to determine whether the total halogen content of each used oil generated is less than, greater than, or equal to 1,000 ppm as required by Section 22a-449-119(b)(1)(A) of the RCSA, incorporating by reference 40 CFR 279.10(a).
- c. Failed to perform used oil fuel analysis as required by Section 22a-449(c)-119(a)(2)(UUU) of the RCSA, incorporating by reference 40 CFR 279.72(a), with specified changes. Specifically, Respondents accepted used oil from generators off-site.
- d. Failed to properly manage materials containing or otherwise contaminated with used oil as required by Section 22a-449(c)-119(a)(1) of the RCSA, incorporating by reference 40 CFR 279.10. Specifically, the Department observed absorbents contaminated with used oil discarded in the regular trash.
- e. Failed to label or mark each container accumulating hazardous waste with the words "Hazardous Waste" as required by Section 22a-449(c)-102(c)(3) of the RCSA, incorporating by reference 40 CFR 262.34(d)(4) and 262.34(a)(3) with specified changes. Specifically, the Department observed hazardous waste accumulating in one, 55-gallon drum labeled "A5" noted as containing ignitable hazardous waste yet not labeled "Hazardous Waste".
- f. Failed to provide secondary containment for a container storing hazardous waste as required by Section 22a-449(c)-102(a)(2)(E) of RCSA, incorporating by reference 40 CFR 264.175. Specifically, the Department found one, 55-gallon drum labeled "A5" and containing ignitable hazardous waste that was stored on the bare ground.
- g. Failed to label or clearly mark containers and aboveground tanks used to store used oil with the words "Used Oil" as required by Section 22a-449(c)-119(a)(1) of the RCSA, incorporating by reference 40 CFR 279.22(c). Specifically, the Department observed numerous tanks and containers that were neither labeled nor clearly marked with the words "Used Oil", including the following:

Site A:

Main Building

- i. one, 300-gallon fuel supply tank (north end).
- ii. five, 5-gallon bung top containers containing varying amounts of used oil.

Within the "Parking Area":

Covered fenced storage area:

- i. one, 275-gallon tank labeled "D" placed in a poly containment basin.
- ii. three, 55-gallon bung top containers with oil pooling on the tops.
- iii. one, 55-gallon bung top container labeled, "Good Year Performance Max SAE 5s-30" with oil staining on top.

- iv. one, 5-gallon container with oil staining placed at the right side of the entrance.

Outdoor container storage area:

- i. twenty-five, 55-gallon containers.
- ii. two, 25-gallon containers.
- iii. one red steel tank-like container stored on the soil labeled "Waste Oil".
- iv. one, 5-gallon paint container was observed uncovered and full of liquid that had an oil sheen on the surface.

Behind building, east side of property:

- i. four containers stored on the soil behind the building were not properly labeled or stored on an impervious base:
  - a. three, 55-gallon steel containers were labeled "C" and placed in a line against the building
  - b. one, 25-gallon poly container was labeled "C" and was filled about 1/3 full of used oil.

Site B:

Main Building:

- i. four, 275-gallon tanks used to store used oil.

Container area southeast side of building:

- i. nine, unlabeled 55-gallon bung top containers, stored on the soil adjacent to the parking lot.

Container area behind building:

- i. one, 55-gallon poly bung top container which had a large split down the side and evidence of leaking.
- ii. nine, 55-gallon containers covered in leaf debris, with a few containers located under a weathered tarp.

Container area north side of the building:

- i. fifty-six, unlabeled 55-gallon bung top containers stored together under a tarp outdoors on the bare ground.

Next to "Johns Refuse" solid waste container for trash:

- i. three, 55-gallon poly bung top containers.



- h. Failed to ensure each tank or container used to store greater than fifty-five (55) gallons of used oil is stored on an impervious base as required by Section 22a-449(c)-119(b)(2) of the RCSA. Specifically, the Department observed the following areas where tanks and/or containers containing used oil were not stored on a sufficiently impervious base:

Site A:

Within the "Parking Area"

Covered fenced storage area:

- i. one, 275-gallon tank labeled "D" placed in a poly containment basin.
- ii. three, 55-gallon bung top containers with oil pooling on the lids and stored outdoors.
- iii. one, 55-gallon bung top container labeled "Good Year Performance Max SAE 5w-30" with oil staining on top and stored outdoors.
- iv. one, 5-gallon unlabeled container with oil staining to the right of the entrance and stored outdoors.

Outdoor container storage area:

- i. twenty-five, 55-gallon containers.
- ii. two, 25-gallon container with no cap.
- iii. One red steel tank-like container stored off the pavement.
- iv. one, 5-gallon paint container, uncovered and full of a liquid that had an oil sheen on the surface.

Behind building, east side of property:

- i. the following four containers were stored outdoors:
  - a. three, 55-gallon steel containers labeled "C" and located in a line against the building.
  - b. one, 25-gallon poly container labeled "C", uncovered and filled a quarter of the way with oil.

Site B:

Container area southeast side of the building:

- i. nine, 55-gallon bung top containers located adjacent to the parking lot and stored outdoors.

Container area behind building:

- i. one, 55-gallon poly bung top container with a large split down the side leaking contents and stored outdoors.

- ii. nine, 55-gallon containers covered in leaf debris and some under a weathered tarp stored outdoors.

Container area north side of the building:

- i. approximately fifty-six, 55-gallon bung top containers were stored outdoors under a weathered tarp.

Next to "Johns Refuse" solid waste container for trash:

- i. three, closed, unlabeled 55-gallon containers of used oil were stored outdoors next to the solid waste container for trash.
- i. Failed to ensure containers and aboveground tanks used to store used oil are managed in compliance with 40 CFR 264.175 and 40 CFR 265 Subpart J as required by Section 22a-449(c)-119(a) of the RCSA, incorporating by reference 40 CFR 279.22(a).
  - j. Failed to ensure containers and tanks used to store used oil are in (1) good condition and (2) not leaking as required by Section 22a-449(c)-119(a)(1) of the RCSA, which incorporates by reference 40 CFR 279.22(b). Specifically, the Department found the following containers used to store used oil were observed to be in poor condition and/or leaking:

Site A:

Within the "Parking Area":

Covered fenced storage area:

- i. One severely rusted, leaking 275-gallon tank labelled "D" placed in a poly containment basin with significant amount of oil pooled at the base of the containment basin.
- ii. three, 55-gallon bung top containers with oil pooling on the tops.
- iii. one, 55-gallon bung top container labeled "Good Year Performance Max SAE 5w-30" with oil staining on the lid.

Outdoor container storage area:

- i. five, 55-gallon containers of the 28 total containers did not have bungs or were otherwise uncovered (some uncovered containers were plugged with rags).
- ii. one, 55-gallon containers appeared to have considerable surface rusting on the covers and sides, as well as rust flaking and oil staining.
- iii. one, uncovered, 5-gallon paint container full of liquid that had an oil sheen on the surface.

Behind building, east Side of property:

- i. three, 55-gallon containers were labeled "C" and placed in a line against the building had bungs and appeared weathered and oil stained.

Site B:

Container area southeast side of building:

- i. nine, 55-gallon bung top steel containers had surface rusting throughout including on the covers and one had oil pooling on the lid.

Container area, behind- building:

- i. one, 55-gallon poly bung top container had a large split down the side and evidence of leaking.
- ii. At least two, 55-gallon containers covered in leaf debris and some under a weathered tarp were noted to be missing caps, uncovered and severely weathered.

Container area north side of building:

- i. Fifty-six, 55-gallon bung top containers were noted as having signs of surface rusting and oil staining on the lids and sides.
- k. Failed to respond to releases as required by Section 22a-449(c)-119(a)(l) of the RCSA, incorporating by reference 40 CFR 279.22(d).
  - l. Failed to comply with the standard used oil collection center as required by Section 22a-449(c)-119(a)(1) of the RCSA, incorporating by reference 40 CFR 279.31.
  - m. Failed to notify as a used oil burner as required by Section 22a-449(c)-119(a)(1) of the RCSA, incorporating by reference 40 CFR 279.62.
  - n. Failed to maintain and operate the facility in a manner that minimizes the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment as required by Section 22a-449(c)-102(a)(2)(K) of the RCSA, incorporating by reference 40 CFR 262.34(a)(4) and 265.31. Specifically, the Department found several containers of used oil at the Site in poor condition and grossly mismanaged, including, but not limited to, the containers identified in findings A.6.a. to A.6.m., inclusive.
  - o. Created or are maintaining a facility or condition which can reasonably be expected to create a source of pollution to the waters of the State, in violation of the Sections 22a-427 and 22a-430 of the Connecticut General Statutes ("CGS"). Specifically, the Department found several 55-gallon drums leaking contents (used oil) onto the ground in the several container storage areas throughout the Site.
  - p. Failed to report spills of any oil, petroleum, or chemical liquids as required by Section 22a-450 of the CGS.
  - q. Created a solid waste facility where more than ten (10) cubic yards of solid waste including, but not limited, to scrap tires was disposed of after July 1, 1971 without a plan, design, and method of operation of such solid waste facility having been filed with the Department and approved by the Commissioner by the issuance of a permit to construct and operate a solid waste facility as required by Sections 22a-208a, 22a-208a(b) and 22a-208c of the CGS and Sections 22a-209-2, 22a-209-4, 22a-209-7, and 22a-



209-8 of the RCSA. Specifically, the Department observed greater than ten (10) cubic yards of scrap tires have been accumulated at the Site.

- r. Failed to comply with Section 22a-241b(d) of the CGS. Specifically, the Department observed more than an incidental amount of designated recyclable items in the 3-yard solid waste container labeled "John's Refuse".
7. By virtue of the facts set forth in paragraphs A.1. through A.6. of this Consent Order, Respondents have violated Sections 22a-208a(b), 22a-208c, 22a-241b(d), 22a-430, and 22a-450 of the CGS; and Sections 22a-209-2, 22a-209-4, 22a-209-7, 22a-209-8, and 22a-449(c)-100 through 119 of the RCSA, incorporating 40 CFR Parts 260 through 279.
  8. On July 29, 2021, the Department issued Notice of Violation No. WSWDH21018 to Respondents to correct violations corresponding to those listed in paragraphs A.6.a through A.6.r and of this Consent Order.
  9. In correspondence received September 9, 2021, December 7, 2021, Respondents reported the violations corresponding to those listed in paragraph A.6.a through A.6.n, A.6.p, and A.6.r of this Consent Order have been addressed and/or corrected. However, remedial activities are still required.
- B. With the agreement of Respondents, the Commissioner, acting under Sections 22a-6, 22a-208, 22a-131, 22a-225, 22a-432, 22a-433 and 22a-449 of the CGS, orders Respondents as follows:
1. Respondents shall bring all violations identified in A.6 above into compliance and maintain compliance with all the applicable provisions of the RCSA Section 22a-449(c)-100, et. seq., including but not limited to those regulations applicable to generators of hazardous waste identified in paragraphs A.6 above in accordance with the following schedule:
    - a. Consultant. On or before **thirty (30) days** after the issuance of this Consent Order, the Respondents shall identify, for the Commissioner's review and written approval, one or more qualified consultant(s) to prepare the documents and oversee the actions required by this Consent Order. The Respondents shall retain one or more qualified consultants as approved by the Commissioner until they comply with this Consent Order. Within ten (10) days after retaining any qualified consultant(s) other than one originally identified and approved under this paragraph, the Respondents shall notify the Commissioner in writing of the identity of and receive written approval of such other qualified consultant(s) from the Commissioner. In order to seek approval of a qualified consultant(s), Respondents shall submit to the Commissioner a description of a qualified consultant(s)' education, experience and training which is relevant to the work required by this Consent Order. The consultant(s) retained to prepare the documents and implement or oversee the actions required by this Order must provide professional services in accordance with Section 22a-133v-1 through 8 of the RCSA (the Licensed Environmental Professional Regulations) and must provide professional services in accordance with the Hazardous and Solid Waste Management Regulations. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.
    - b. Correct Violations. Respondents shall submit, for the Commissioner's review and approval, documentation demonstrating that the violation noted in paragraph A.6.o and A.6.q above has been corrected by performing the following:
      - i. On or before **forty-five (45) days** after issuance of this Consent Order, Respondents shall submit to the Commissioner for approval a waste removal work plan for the removal and proper disposal



- of all waste at the Site.. The waste removal work plan at a minimum shall include a schedule for removal and proper disposal of all waste, a table quantifying the waste on-site, characterization of the waste and identity of facilities permitted to receive the waste from the Site.. In no event shall the schedule for removal and proper disposal of all waste identified in the waste removal work plan take longer than **thirty (30) calendar days**;
- ii. Respondent's shall within **seven (7) days** from the date of the Commissioner's approval of the Respondent's waste removal work plan, shall comply with the approved waste removal work plan by commencing implementation of the plan.
  - iii. On or before **sixty (60) days** after issuance of this Consent Order, Respondents shall submit to the Commissioner for approval a remedial action plan to investigate and complete any further remediation of the Site to the satisfaction of the Commissioner. The remedial action plan shall include a schedule for the remedial activities including major milestones, as well as a description of the remedial work to be performed (e.g., sampling plan, list of constituents of concern, plan for the management of the hazardous and solid waste generated from the remedial work, etc.).
  - iv. Respondents shall within **thirty (30) days** from the date of the Commissioner's approval of the Respondent's remedial action plan, shall comply with the approved remedial action plan by commencing implementation of the plan.
  - v. Respondents shall within **thirty (30) days** from completion of the remedial work in accordance with the approved remedial action plan, submit to the Commissioner for approval a final waste removal and remedial action report documenting the removal and proper disposal of all waste at the Site and any necessary remediation of the Site. The final waste removal and remedial action report at a minimum shall include a documentation (e.g., bills of lading, manifests, invoices, etc.) demonstrating removal and proper disposal of all waste at the Site and remedial measures taken (including analytical results) to verify that the Site conditions do not pose a threat to human health or the environment. In no event shall submission of the final waste removal and remedial action report take longer than **thirty (30) days** from the date of completion of remedial work required in accordance with the approved remedial action plan.
- c. Compliance Plan. On or before **ninety (90) days** after the date of issuance of this Consent Order, Respondents shall submit for the Commissioner's review and written approval a plan detailing additional actions and/or operational changes to ensure future compliance with the requirements specified in paragraph A.6 of this Consent Order. Within **five (5) days** after the Commissioner approves such plan, Respondents shall carry out the plan and maintain it in full effect thereafter.
  - d. Business Recycling Profile. On or before **ninety (90) days** after issuance of this consent order, Respondents shall conduct a comprehensive recycling review of the facility to evaluate compliance with Connecticut's recycling laws set forth in Section 22a-241b(d) of the CGS, and shall submit for the Commissioner's review and written approval a Business Recycling Profile documenting the management of recyclable materials at the facility.
2. Full compliance. Respondents shall not be considered in full compliance with this Consent Order until all actions required by this Consent Order have been completed as approved and to the Commissioner's satisfaction.
  3. Status of NOVWSDH21018. This Consent Order supersedes NOVWSDH21018.



4. Civil penalty. On or before **fourteen (14) days** after the issuance of this Consent Order, Respondents shall pay a penalty of **twenty-six thousand four hundred dollars (\$26,400)** as the total civil penalty to be sought by the Commissioner for those, and only those, violations described in paragraphs A.6 above. Payment shall be made in accordance with the protocol described in paragraph B.5 below.
5. Payment of penalties. Payment of penalties under this Consent Order shall be mailed or personally delivered to the Department of Energy and Environmental Protection, Bureau of Financial and Support Services, Accounts Receivable Office, 79 Elm Street, Hartford, CT 06106-5127, and shall be by certified or bank check payable to the "Connecticut Department of Energy and Environmental Protection." The check shall state on its face, "Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, Civil Penalty" and the Consent Order number identified on the first page of this Consent Order. A copy of the check as well as any transmittal letter shall be mailed or delivered to Julie Dutton, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division at the same address.
6. Sampling and sample analyses. All sampling and sample analyses which are required by this Consent Order and all reporting of such sample analyses shall be conducted by a laboratory certified by the Connecticut Department of Public Health to conduct such sampling and analyses. All sampling and sample analyses performed under this order shall be performed in accordance with procedures specified or approved in writing by the Commissioner, or, if no such procedures have been specified or approved, in accordance with EPA document SW-846. Unless otherwise specified by the Commissioner in writing, the value of each parameter shall be reported to the maximum level of precision and accuracy specified in the applicable protocol, and if no such level is specified, to the maximum level of precision and accuracy possible.
7. Approvals. Respondents shall use best efforts to submit to the Commissioner all documents required by this Consent Order in a complete and approvable form. If the Commissioner notifies Respondents that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Respondents shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within thirty (30) days of the Commissioner's notice of deficiencies. In approving any document or other action under this Consent Order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this Consent Order. Nothing in this paragraph shall excuse noncompliance or delay.
8. Definitions. As used in this Consent Order, "Commissioner" means the Commissioner or a representative of the Commissioner.
9. Dates. The date of "issuance" of this Consent Order is the date the Consent Order is deposited in the U.S. mail or personally delivered, whichever is earlier. The date of submission to the Commissioner of any document required by this Consent Order shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this Consent Order, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is deposited in the U.S. mail or is personally delivered, whichever is earlier. Except as otherwise specified in this Consent Order, the word "day" as used in this Consent Order means calendar day. Any document or action which is required by this Consent Order to be submitted or performed by a date which falls on a Saturday, Sunday or a Connecticut or federal holiday shall be submitted or performed by the next day which is not a Saturday, Sunday or Connecticut or federal holiday.



10. Certification of documents. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this Consent Order shall be signed by Respondents or, if Respondents is not an individual, by Respondents' chief executive officer or a duly authorized representative of such officer, as those terms are defined in Section 22a-430-3(b)(2) of the RCSA, and by the individual(s) responsible for actually preparing such document, and each such individual shall certify in writing as follows:

*"I have personally examined and am familiar with the information submitted in this document and all attachments hereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law."*

11. Noncompliance. This Consent Order is a final order of the Commissioner with respect to the matters addressed herein, and is non-appealable and immediately enforceable. Failure to comply with this Consent Order may subject Respondents to an injunction and penalties.
12. False statements. Any false statement in any information submitted pursuant to this Consent Order may be punishable as a criminal offense under Section 53a-157b of the CGS and any other applicable law.
13. Notice of transfer; liability of Respondents. Until Respondents has fully complied with this Consent Order, Respondents shall notify the Commissioner in writing no later than fifteen (15) days after transferring all or any portion of the facility, the operations, the Site or the business which is the subject of this Consent Order or after obtaining a new mailing or location address. Respondents' obligations under this Consent Order shall not be affected by the passage of title to any property to any other person or municipality.
14. Commissioner's powers. Except as provided hereinabove with respect to payment of civil penalties, nothing in this Consent Order shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for past, present, or future violations of law. If at any time the Commissioner determines that the actions taken by Respondents pursuant to this Consent Order have not successfully corrected all violations, fully characterized the extent or degree of any pollution, or successfully abated or prevented pollution, the Commissioner may institute any proceeding to require Respondents to undertake further investigation or further action to prevent or abate violations or pollution.
15. Respondents' obligations under law. Nothing in this Consent Order shall relieve Respondents of other obligations under applicable federal, state and local law.
16. No assurance by Commissioner. No provision of this Consent Order and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken by Respondents pursuant to this Consent Order will result in compliance or prevent or abate pollution.
17. Access to Site. Any representative of the Department of Energy and Environmental Protection may enter the Site without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this Consent Order.
18. No effect on rights of other persons. This Consent Order neither creates nor affects any rights of persons or municipalities that are not parties to this Consent Order.



19. Notice to Commissioner of changes. Within fifteen (15) days of the date Respondents becomes aware of a change in any information submitted to the Commissioner under this Consent Order, or that any such information was inaccurate or misleading or that any relevant information was omitted, Respondents shall submit the correct or omitted information to the Commissioner.
20. Notification of noncompliance. In the event that Respondents becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this Consent Order or of any document required hereunder, Respondents shall immediately notify by telephone the individual identified in the next paragraph and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, is minimized to the greatest extent possible. Within five (5) days of the initial notice, Respondents shall submit in writing the date, time, and duration of the noncompliance and the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and Respondents shall comply with any dates which may be approved in writing by the Commissioner. Notification by Respondents shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.
21. Submission of documents. Any document required to be submitted to the Commissioner under this Consent Order shall, unless otherwise specified in this Consent Order or in writing by the Commissioner, be directed to:



Evelyn Silva, Environmental Analyst 2  
Department of Energy and Environmental Protection  
Bureau of Materials Management and Compliance Assurance  
Waste Engineering and Enforcement Division  
79 Elm Street, 4<sup>th</sup> Floor  
Hartford, Connecticut 06106-5127

22. Joint and several liability. Respondents shall be jointly and severally liable for compliance with this consent order.

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Respondents consents to the issuance of this Consent Order without further notice. The undersigned certifies that he/she is fully authorized to enter into this Consent Order and to legally bind the Respondents to the terms and conditions of the Consent Order.

**CHEAP AUTO RENTAL LLC**

BY:   
Lewis Schatten, Member  
  
Date

**860 CAMPBELL AVE LLC**

BY:   
Lewis Schatten, Member  
  
Date

Issued as a final order of the Commissioner of Energy and Environmental Protection.

  
Jennifer L. Perry, P.E.  
Chief  
  
Date

CONSENT ORDER No. WSWDH 22001

Town of Wallingford Land Records