UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 0 3 2007

REPLY TO THE ATTENTION OF:

SC-6J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael Kenny
Owner
High-Po-Chlor
36801 Wabash Street
Romulus, Michigan 48174

Re: **High-Po-Chlor, Romulus, Michigan** Consent Agreement and Final Order.
Docket No. **CAA-05-2007-0007**

Dear Mr. Kenny:

Enclosed please find a fully executed Consent Agreement and Final Order (CAFO) in resolution of the above case. The U.S. EPA has filed the original CAFO with the Regional Hearing Clerk on April 3, 2007. Please pay the civil penalty in the amount of $1,000 in the manner prescribed in paragraphs 53-58 and reference your check with the number BD 2750703A008 and docket number **CAA-05-2007-0007**. In addition, please perform the Supplemental Environmental Project (SEP) in the manner prescribed in paragraphs 59-72.

Please feel free to contact Monika Chrzaszcz at (312) 886-0181 if you have any questions regarding the enclosed documents. Please direct any legal questions to William Wagner, Associate Regional Counsel, at (312) 886-4684. Thank you for your assistance in resolving this matter.

Sincerely yours,

Mark J. Horwitz, Chief
Chemical Emergency
Preparedness & Prevention Section

Enclosure

cc: Regional Hearing Clerk
U.S. EPA Region 5

William Wagner (w/enclosure)
Office of Regional Counsel
U.S. EPA Region 5

bcc:

FOIA File

File Copy (to originator)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	) **Docket No. CAA-05-2007-0007**
	)
High-Po-Chlor	) **CONSENT AGREEMENT**
36801 Wabash Street	) **And**
Romulus, Michigan 48174	) **FINAL ORDER**
	)
Respondent.	)
______________________________	)

CONSENT AGREEMENT AND FINAL ORDER

I. AUTHORITY

1. The United States Environmental Protection Agency ("Complainant" or "U.S. EPA"), and High-Po-Chlor ("Respondent"), Romulus, Michigan, 48174, have agreed to settle this action before the filing of a complaint, and thus this action is simultaneously commenced and concluded by the execution and filing of this Consent Agreement and Final Order ("CAFO") pursuant to Sections 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules"), 40 C.F.R. §§ 22.13(b), 22.18(b)(2) and (3).

II. JURISDICTION

2. This is an administrative action for the assessment of civil penalties instituted pursuant to Sections 113(a)(3)(A) and (d) of the Clean Air Act ("the Act"), 42 U.S.C. §§7413(a)(3)(A) and (d), and the Consolidated Rules, for violations of Section 112(r) of the Act, 42 U.S.C. §7412(r), and the regulations promulgated thereunder.

3. The Complainant is, by lawful delegation, the Director of the Superfund Division, U.S. EPA, Region 5, Chicago, Illinois.

4. Respondent is and was at all times relevant to this action the owner or operator of a stationary source located at 36801 Wabash Street, Romulus, Michigan, 48174.

5. This CAFO is based on information which indicates that Respondent violated Section 112(r)(7)(E) of the Act, 42 U.S.C. §7412(r)(7)(E), and the provisions of 40 C.F.R. Part 68, as referenced at 40 C.F.R. §§ 68.12(a) and (d), at the above-referenced stationary source.

III. STATUTORY and REGULATORY BACKGROUND

6. In accordance with Section 112(r) of the Act, on June 20, 1996, U.S. EPA promulgated regulations to prevent accidental releases of regulated substances and to minimize the consequences of those releases that do occur. 59 Fed. Reg. 31668. These regulations, known as the Risk Management Program regulations, are codified at 40 C.F.R. Part 68.

A. APPLICABILITY OF RISK MANAGEMENT PROGRAM

7. The Risk Management Program regulations apply to all stationary sources that have more than a threshold quantity of a regulated substance in a process.

8. "Stationary source" means any buildings, structures, equipment, installations, or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person, and from which an accidental release may occur. Section 112(r)(2) of the Act; 40 C.F.R. § 68.3.

9. "Regulated substance" means any substance listed in, or pursuant to, Section 112(r)(3) of the Act, and listed at 40 C.F.R. § 68.130, Tables 1 - 4. Section 112(r)(2) of the Act; 40 C.F.R. § 68.3.

10. "Threshold quantity" means the quantity specified for regulated substances pursuant to Section 112(r)(5) of the Act, listed at 40 C.F.R. § 68.130, Tables 1 - 4, and

determined to be present at a stationary source as specified in 40 C.F.R. § 68.115. 40 C.F.R. § 68.3.

11. "Process" means any activitiy involving a regulated sustance including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities. 40 C.F.R. § 68.3.

12. "Covered process" means a process that has a regulated substance present in more than a threshold quantity as determined under 40 C.F.R. § 68.115. 40 C.F.R. § 68.3.

13. Based upon certain criteria set forth at 40 C.F.R. § 68.10, covered processes are subject to three levels of regulatory requirements which are identified as Programs 1, 2, and 3.

14. Program 3 applies to all processes which do not meet the requirements of Program 1 eligibility, as set forth at 40 C.F.R. §68.10(b), and are either subject to the OSHA Process Safety Management ("PSM") standard set forth at 29 C.F.R. 1910.119, or the process is in NAICS code 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, 32532. 40 C.F.R. § 68.10(d).

B. REQUIREMENTS OF RISK MANAGEMENT PROGRAM

15. An owner or operator of a stationary source subject to the Risk Management Program regulations shall comply with the requirements of 40 C.F.R. Part 68 by no later than the latest of the following dates: June 21, 1999; three years after the date on which the regulated substance is first listed under 40 C.F.R. § 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process. Section 112(r)(7)(B) of the Act; 40 C.F.R. §§ 68.10(a) and 68.150.

16. The owner or operator of a stationary source with a process subject to Program 3

shall submit a Risk Management Plan ("RMP") as provided in 40 C.F.R. Part 68, Subpart G, which shall include information regarding, among other things: hazard assessments; an accidental release prevention program; and, an emergency response program. Section 112(r)(7) of the Act; 40 C.F.R. § 68.12(a) and (d).

17. The owner or operator of a stationary source with a process subject to Program 3 shall develop and implement a management system as provided in 40 C.F.R. § 68.15. 40 C.F.R. § 68.12(d).17.

18. The owner or operator of a stationary source with a process subject to Program 3 shall conduct a hazard assessment as provided in 40 C.F.R. Part 68, Subpart B. Section 112(r)(7) of the Act; 40 C.F.R. § 68.12(a) and (d).

19. The owner or operator of a stationary source with a process subject to Program 3 shall implement the prevention requirements of 40 C.F.R. Part 68, Subpart D. Section 112(r)(7) of the Act; 40 C.F.R. § 68.12(d).

20. The owner or operator of a stationary source with a process subject to Program 3 shall develop and implement an emergency response program as provided in 40 C.F.R. Part 68, Subpart E. Section 112(r)(7) of the Act; 40 C.F.R. § 68.12(a) and (d).

C. VIOLATION AND PENALTY PROVISIONS

21. Section 112(r)(7)(E) of the Act, 42 U.S.C. § 7412(r)(7)(E), provides that after the effective date of any regulation or requirement promulgated pursuant to Section 112(r) of the Act, it shall be unlawful for any person to operate any stationary source subject to such regulation or requirement in violation of such regulation or requirement.

22. Section 113(d) of the Act, 42 U.S.C. § 7413(d), and 40 C.F.R. Part 19, provide

that the Administrator of U.S. EPA may assess a civil penalty of up to $27,500 per day of violation up to a total of $220,000 for each violation of Section 112(r) of the Act that occurred from January 31, 1997 through March 15, 2004, and may assess a civil penalty of up to $32,500 per day of violation up to a total of $270,000 for each violation of Section 112(r) of the Act that occurred after March 15, 2004.

23. Section 113(d)(1) of the Act limits the Administrator's authority to matters where the first alleged date of violation occurred no more than 12 months prior to initiation of the administrative action, except where the Administrator and the Attorney General of the United States jointly determine that a matter involving a longer period of violation is appropriate for an administrative penalty action.

IV. FINDINGS OF FACT AND CONCLUSIONS OF LAW

24. Respondent is a Michigan company with a plant located at 3601 Wabash, Romulus, Michigan, 48174 ("Facility").

25. Respondent is a "person," as that term is defined at Section 302(e) of the Act, 42 U.S.C. § 7602(e).

26. For purposes of the requirements at 40 C.F.R. Part 68, Respondent is the "owner or operator" of the Facility. Section 112(a)(9) of the Act, 42 U.S.C. § 7412(a)(9).

27. The Facility, which includes a single rail siding, is a "stationary source," as that term is defined at 40 C.F.R. § 68.3.

28. Respondent produces sodium hypochlorite at the Facility using chlorine as a raw material.

29. Chlorine is a "regulated substance," as that term is defined in Section 112(r)(3) of

the Act and 40 C.F.R. § 68.3, and is listed at 40 C.F.R. § 68.130, Table 1.

30. The "threshold quantity" for chlorine is 2,500 pounds. 40 C.F.R. § 68.130, Table 1.

31. Respondent stores chlorine in a 90 ton chlorine rail car located on the single rail siding at the Facility. The 90 ton chlorine rail car is delivered to the Facility fully loaded with chlorine and is not removed from the Facility until the rail car is empty. The on-site movement of the chlorine is implemented by the connection of the chlorine rail car to the Powell Continuous Bleach Machine by a monel chlorine hose.

32. Respondent's production of sodium hypochlorite is a "process," as defined at 40 C.F.R. § 68.3.

33. The amount of chlorine present in the process at the Facility, as determined in accordance with the threshold determination requirements of 40 C.F.R. § 68.115, exceeds the threshold quantity for chlorine.

34. Based on the above, the Facility is subject to the requirements of the Risk Management Program regulations set forth at 40 C.F.R. Part 68. Section 112(r)(7) of the Act; 40 C.F.R. § 68.10(a).

35. The Facility is subject to the "Program 3" requirements because the process does not meet the requirements for Program 1, as set forth at 40 C.F.R. § 68.10(b), and the process is subject to the OSHA PSM standard as set forth at 29 C.F.R. § 1910.119. 40 C.F.R. § 68.10(d).

36. Respondent has produced sodium hypochlorite at the Facility using the above-described process from on or about 1981.

37. Accordingly, Respondent was required to comply with the Risk Management

Program regulations set forth at 40 C.F.R. Part 68 by June 21, 1999. 40 C.F.R. §§ 68.10(a).

38. Respondent has failed to timely submit an RMP in accordance with 40 C.F.R. Part 68, Subpart G, in violation of 40 C.F.R. § 68.12(a) and (d).

39. Respondent has failed to timely develop and implement a management system in accordance with 40 C.F.R. § 68.15, in violation of 40 C.F.R. § 68.12(d).

40. Respondent has failed to timely conduct a hazard assessment in accordance with 40 C.F.R. Part 68, Subpart B, in violation of Section 112(r)(7) of the Act and 40 C.F.R. § 68.12(a) and (d).

41. Respondent has failed to timely implement the prevention requirements of 40 C.F.R. Part 68, Subpart D, in violation of Section 112(r)(7) of the Act and 40 C.F.R. § 68.12(d).

42. Respondent has failed to timely develop and implement an emergency response program in accordance with 40 C.F.R. Part 68, Subpart E, in violation of Section 112(r)(7) of the Act and 40 C.F.R. § 68.12(a) and (d).

43. Respondent has continued to operate the facility in violation of the above-described provisions of the Risk Management Program regulations, in violation of Section 112(r)(7)(E) of the Act.

44. The Administrator and the Attorney general of the United States, each through their respective delegates, have determined jointly that an administrative penalty action is appropriate for the period of violations alleged in this CAFO.

45. Accordingly, the above-described violations of 40 C.F.R. Part 68 and Section 112(r) of the Act are subject to the assessment of a civil penalty under Section 113(d) of the Act, 42 U.S.C. § 7413(d).

V. TERMS OF SETTLEMENT

46. Complainant and Respondent agree that the settlement of this matter pursuant to Section 22.13(b) of the Consolidated Rules, 40 C.F.R. § 22.13(b), is in the public interest and that the entry of this CAFO without engaging in litigation is the most appropriate means of resolving this matter.

47. Respondent stipulates that Complainant has jurisdiction over the subject matter of this CAFO, and Respondent waives any jurisdictional defenses.

48. Respondent certifies that it is in full compliance with Section 112(r) of the Act and the Risk Management Program requirements.

49. Respondent neither admits nor denies the factual allegations and conclusions of law set forth above in this CAFO.

50. Respondent consents to the issuance of this CAFO, payment of a civil penalty, and completion of a Supplemental Environmental Project (SEP), as set forth below in this CAFO.

51. Respondent hereby waives its right to a judicial or administrative hearing on any issue of law or fact set forth in this CAFO, and waives its right to appeal the Final Order accompanying this Consent Agreement.

VI. PENALTIES and FEES

52. In consideration of High-Po-Chlor's agreement to perform a supplemental environmental project (SEP), its cooperation, and such other factors as justice may require, U.S. EPA agrees to mitigate the penalty of $35,000 to $1,000.

53. High-Po-Chlor must pay the $1,000 civil penalty by cashier's or certified check payable to the "Treasurer, United States of America," within 30 days after the effective date of this CAFO.

54. High-Po-Chlor must send the check to:

U.S. EPA Region 5
PO Box 371531
Pittsburgh, PA 15251-7531

55. A transmittal letter, stating the Respondent's name, complete address, the case docket number, and the billing document number must accompany the payment. Respondent must write the case docket number and the billing document number on the face of the check. Respondent must send copies of the check and transmittal letter to:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard (E-13J)
Chicago, Illinois 60604

Monika Chrzaszcz
Chemical Emergency
Preparedness and Prevention Section
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard (SC-6J)
Chicago, Illinois 60604

William H. Wagner
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604

56. This civil penalty is not deductible for federal tax purposes.

57. If High-Po-Chlor does not timely pay the civil penalty, U.S. EPA may bring an action pursuant to Section 113(d)(5) of the Act, 42 U.S.C. §7413(d)(5), to collect any unpaid

portion of the penalty with interest, handling charges, nonpayment penalties and the United States' enforcement expenses for the collection action. The parties agree that the validity, amount and appropriateness of the civil penalty are not reviewable in a collection action in this matter.

58. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 26 U.S.C. § 6621(a)(2). Respondent must pay a $15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, U.S. EPA will assess a penalty at the rate of at least six percent per year on any principal amount not paid within 90 days of the date that this CAFO has been entered by the Regional Hearing Clerk.

VII. SUPPLEMENTAL ENVIRONMENTAL PROJECT

59. High-Po-Chlor agrees to complete a SEP designed to protect public health and the environment which will include the actions described below.

60. High-Po-Chlor agrees to install a Powell UniPro Valve Closure System for its 90-ton rail car by March 1, 2007. Further, High-Po-Chlor represents that the cost to perform the SEP will be at least $35,607.00.

61. High-Po-Chlor certifies that it is not required to perform or develop the SEP by any law, regulation, grant, order, or agreement, or as injuctive relief as of the date it signs this CAFO. High-Po-Chlor further certifies that it has not received, and is not negotiation to receive, credit for the SEP in any other enforcement action.

62. High-Po-Chlor must submit a SEP Completion Report to U.S. EPA by April 1, 2007. The SEP Completion Report must contain the following information:

a. Detailed description of the SEP as completed;

b. Description of any operating problems and the actions taken to correct the problems;

c. Itemized costs of goods and services used to complete the SEP documented by copies of invoices, purchase orders, or canceled checks that specifically identify and itemize the individual costs of the goods and services;

d. Certification that Respondent has completed the SEP in compliance with this CAFO; and

e. Description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible).

63. High-Po-Chlor must submit the SEP Completion Report to:

Attn: Monika Chrzaszcz (SC-6J)
Chemical Emergency
Preparedness and Prevention Section
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

64. High-Po-Chlor must certify that the SEP Completion Report is true and complete by including the following statement signed by one of its officers:

> I certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, the information is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

65. Following receipt of the SEP Completion Report, U.S. EPA will notify Respondent in writing that:

a. It has satisfactorily completed the SEP and the SEP report;

b. There are deficiencies in the SEP as completed or in the SEP report and U.S. EPA will give High-Po-Chlor 30 days to correct the deficiencies; or

c. High-Po-Chlor has not satisfactorily completed the SEP or the SEP report and

U.S. EPA will seek stipulated penalties under Paragraph 68.

66. If U.S. EPA does not provide notice to Respondent under the provisions of Paragraph 65, above, within 45 days from receipt of the SEP Completion Report, it shall be deemed that U.S. EPA has exercised option a. under Paragraph 65.

67. If U.S. EPA exercises option b. under Paragraph 65, above, Respondent may object in writing to the deficiency notice within 10 days of receiving the notice. The parties will have 30 days from U.S. EPA's receipt of Respondent's objection to reach an agreement. If the parties cannot reach an agreement, U.S. EPA will give Respondent a written decision on its objection. Respondent will comply with any requirements that U.S. EPA imposes in its decision. If Respondent does not complete the SEP as required by U.S. EPA's decision, Respondent will pay stipulated penalties to the United States under Paragraph 68, below.

68. If Respondent violates any requirement of this CAFO relating to the SEP, Respondent must pay stipulated penalties to the United States as follows:

a. Except as provided in subparagraph b, below, if Respondent did not complete the SEP satisfactorily according to this CAFO, Respondent must pay a stipulated penalty of $20,000.

b. If Respondent did not complete the SEP satisfactorily, but U.S. EPA determines that Respondent: (i) made good faith and timely efforts to complete the SEP; and (ii) certified, with supporting documents, that it spent at least 80 percent of the required amount on the SEP, Respondent will not be liable for any stipulated penalty.

c. If Respondent satisfactorily completed the SEP, but spent less than 80 percent of the required amount on the SEP, Respondent must pay a stipulated penalty of $5,000.

d. If Respondent failed to timely submit the SEP Completion Report required by Paragraph 61, above, Respondent must pay a stipulated penalty of $50 for each day after the report was due until it submits the report.

69. U.S. EPA's determinations of whether Respondent satisfactorily completed the SEP and whether it made good faith, timely efforts to complete the SEP will bind Respondent.

70. High-Po-Chlor must pay any stipulated penalties within 15 days of receiving U.S. EPA's written demand for the penalties. Respondent will use the method of payment specified in Paragraphs 54, 55, and 58, above, and will pay interest, handling charges, and nonpayment penalties on any overdue amounts.

71. Any public statement that High-Po-Chlor makes referring to the SEP must include the following language, "Respondent undertook this project under the settlement of the United States Environmental Protection Agency's enforcement action against Respondent for violations of Section 112(r) of the Act, 42 U.S.C. § 7412(r), and the implementing regulations at 40 C.F.R. Part 68.

72. If an event occurs which causes or may cause a delay in completing the SEP as required by this CAFO:

a. Respondent must notify U.S. EPA in writing within 10 days after learning of an event which caused or may cause a delay in completing the SEP. The notice must describe the anticipated length of the delay, its cause(s), Respondent's past and proposed actions to prevent or minimize the delay, and a schedule to carry out those actions. Respondent must take all reasonable actions to avoid or minimize any delay. If Respondent fails to notify U.S. EPA according to this paragraph, Respondent will not receive an extension of time to complete the SEP.

b. If the parties agree that circumstances beyond the control of Respondent caused or may cause a delay in completing the SEP, the parties will stipulate to an extension of time no longer than the period of delay.

c. If U.S. EPA does not agree that circumstances beyond the control of Respondent caused or may cause a delay in completing the SEP, U.S. EPA will notify Respondent in writing of its decision and any delays in completing the SEP will not be excused.

d. Respondent has the burden of proving that circumstances beyond its control caused or may cause a delay in completing the SEP. Increased costs for completing the SEP will not be a basis for an extension of time under subparagraph b, above. Delay in achieving an interim step will not necessarily justify or excuse delay in achieving subsequent steps.

VIII. GENERAL TERMS OF SETTLEMENT

73. Compliance with the terms of this CAFO shall constitute full settlement of this proceeding with respect to all civil and administrative claims alleged in Section IV.

74. Nothing in this CAFO shall relieve Respondent from complying with any provision of the Act or any other applicable federal, State, or local environmental law or regulation.

75. Nothing in this CAFO restricts U.S. EPA's authority to seek Respondent's compliance with the Act and other applicable laws and regulations.

76. If Respondent fails to comply with any provision contained in this CAFO, Respondent waives any rights it may possess in law or equity to challenge the authority of U.S. EPA to bring a civil action in the appropriate United States District Court to compel compliance with the regulations cited above, and to assess a civil penalty in an amount greater than assessed in this CAFO.

77. All of the terms and conditions of this CAFO together comprise one agreement, and each of the terms and conditions is in consideration of all of the other terms and conditions. In the event that this CAFO (or one or more of its terms and conditions) is held invalid, or is not executed by all of the signatory parties in identical form, then the entire CAFO shall be null and void.

78. This CAFO constitutes the entire agreement between the parties.

79. Respondent and Complainant agree to bear their own respective costs and attorneys' fees.

80. The terms of this CAFO bind Respondent, its successors, and assigns. Respondent shall give notice and a copy of this CAFO to any successor in interest prior to any transfer of ownership or operational control of the facility.

81. Each person signing this consent agreement certifies that he or she has the authority to sign this consent agreement for the party whom he or she represents and to bind that party to its terms.

82. Respondent and U.S. EPA agree to the issuance and entry of the accompanying Final Order.

83. This CAFO shall become effective on the date that it is filed with the Regional Hearing Clerk, Region 5.

The foregoing Consent Agreement is hereby stipulated, agreed, and approved for entry:

U.S. Environmental Protection Agency
Complainant

Date: 3-27-07 By: Richard C Karl

Richard C. Karl, Director
Superfund Division
U.S. EPA, Region 5
77 West Jackson Boulevard (SC-6J)
Chicago, Illinois 60604-3590

High-Po-Chlor
Respondent

Date: March 8, 2007 By: [signature]

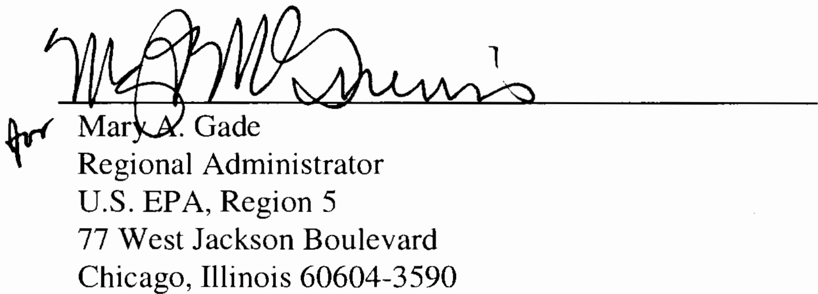
Michael Kenny
Owner

Consent Agreement and Final Order
High-Po-Chlor, Romulus, Michigan
Docket No. CAA-05-2007-0007

FINAL ORDER

The foregoing Consent Agreement, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. IT IS SO ORDERED.

Date: 3/29/07



for Mary A. Gade
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

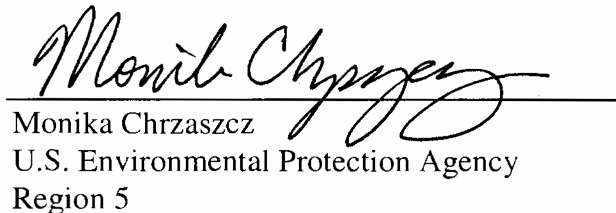
Certificate of Service

I hereby certify that I have caused a copy of the foregoing Consent Agreement and Final Order (CAFO) to be served upon the persons designated below, on the date below, by causing said copies to be delivered by depositing in the U.S. Mail, First Class, and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelope addressed to:

Michael Kenny, Owner
High-Po-Chlor
3588 Plymouth Road #383
Ann Arbor, MI 48105

I have further caused the original CAFO and this Certificate of Service, and one copy, to be filed with the Regional Hearing Clerk, U.S. EPA, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604, on the date below.

Dated this 3 date of April, 2007.



Monika Chrzaszcz
U.S. Environmental Protection Agency
Region 5

CAA-05-2007-0007