



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

2017 APR 25 PM 5:43

In the Matter of:)
) EPA Docket Number
) CAA-03-2017-0074
)
)
Perdue Foods LLC)
Salisbury Processing Plant) **Proceedings Pursuant to Sections 112(r)**
31149 Old Ocean City Road) **and 113 of the Clean Air Act,**
Salisbury, Maryland 21804,) **42 U.S.C. § 7412(r) and 7413**
)
)
Respondent.)
)
Salisbury Processing Plant)
521 Willow Street)
Salisbury, Maryland 21801,)
)
Facility.)
)

CONSENT AGREEMENT

STATUTORY AUTHORITY

This Consent Agreement is proposed and entered into under the authority vested in the President of the United States by Section 113(d) of the Clean Air Act, as amended (the "CAA"), 42 U.S.C. § 7413(d). The President has delegated this authority to the Administrator of the U.S. Environmental Protection Agency ("EPA"), who has, in turn, delegated it to the Regional Administrator of EPA, Region III. The Regional Administrator has re-delegated these authorities to the Director of the Hazardous Site Cleanup Division, EPA Region III ("Complainant"). Further, this Consent Agreement is proposed and entered into under the authority provided by the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits" ("Consolidated Rules of Practice"), 40 C.F.R. Part 22.

The parties agree to the commencement and conclusion of this cause of action by issuance of this Consent Agreement and Final Order (referred to collectively herein as "CA/FO") as prescribed by the Consolidated Rules of Practice, pursuant to 40 C.F.R. § 22.13(b),

22.18(b)(2) and (3), and having consented to the entry of this CA/FO, agree to comply with the terms of this CA/FO.

JURISDICTION

1. The Consolidated Rules of Practice govern this administrative adjudicatory proceeding pursuant to 40 C.F.R. § 22.1(a)(2).

2. The Regional Judicial Officer has the authority to approve this settlement and conclude this proceeding pursuant to 40 C.F.R. § 22.4(b) and 22.18(b)(3).

3. For the purpose of this proceeding, Respondent Perdue Foods LLC admits to the jurisdictional allegations in this Consent Agreement and agrees not to contest EPA's jurisdiction with respect to the execution or enforcement of this Consent Agreement.

4. For the purpose of this proceeding, and with the exception of Paragraph 3, above, Respondent neither admits nor denies the following factual allegations and conclusions of law, but expressly waives its rights to contest said allegations in this proceeding only.

FINDINGS OF FACT

5. Respondent is a Maryland limited liability company.

6. Respondent is a "person" as defined by Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

7. Respondent owns and operates a poultry processing facility located at 521 Willow Street in Salisbury, Maryland (the "Facility").

8. Respondent submitted an initial risk management plan for the Facility pursuant to CAA Section 112(r)(7), 42 U.S.C. § 7412(r)(7) and its implementing regulations, the Chemical Accident Prevention Provisions, 40 C.F.R. Part 68 on June 24, 1999. Several resubmissions and corrections have been made since the original submission, with the latest resubmission on December 05, 2013, which was later corrected on March 27, 2014.

9. According to the Facility risk management plan, Respondent handles and stores, and has handled and stored, approximately 49,000 pounds of anhydrous ammonia, Chemical Abstracts Service ("CAS") Number 7664-41-7, at the Facility in its ammonia refrigeration system since at least April 23, 2005.

10. Anhydrous ammonia is an irritant and is corrosive to the skin, eyes, respiratory tract and mucous membranes. Exposure to liquid ammonia or rapidly expanding gases may cause severe chemical burns and frostbite to the eyes, lungs and skin. Skin and respiratory diseases could be aggravated by exposure.

11. EPA conducted an inspection of the Facility on March 31, 2014 (the “Inspection”) to determine Respondent’s compliance with CAA Section 112(r)(7) and the Chemical Accident Prevention Provisions at 40 C.F.R. Part 68.

12. The Chemical Accident Prevention Provisions require an owner or operator to comply with process safety information requirements at 40 C.F.R. § 68.65(d)(1)(vi) and (d)(2), *i.e.*, to compile process safety information pertaining to design codes and standards relevant to the equipment and to document that the equipment in the process complies with recognized and generally accepted good engineering practices.

13. Recognized and generally accepted good engineering practices for mechanical refrigeration systems using anhydrous ammonia include those of the American National Standards Institute (“ANSI”), the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (“ASHRAE”), and the International Institute of Ammonia Refrigeration (“IIAR”), EPA CEPP Alert #550-F-01-009 (Hazards of Ammonia Releases at Ammonia Refrigeration Facilities) and manufacturers’ recommendations, including the following:

- a. ANSI/IIAR 2-2008B, Equipment, Design, and Installation of Closed-Circuit Ammonia Mechanical Refrigerating Systems (“IIAR 2”)
- b. ANSI/ASHRAE Standard 15-2007, Safety Standard for Refrigeration Systems (“ASHRAE 15”)

FINDINGS OF FACT RELATED TO THE VIOLATIONS OF SECTION 112(r)(7) OF THE CLEAN AIR ACT

14. The findings of fact and conclusions of law contained in Paragraphs 1 through 13 of this CA/FO are incorporated by reference herein as though fully set forth at length.

15. On November 15, 1990, the President signed into law the Clean Air Act Amendments of 1990. The Clean Air Act Amendments added Section 112(r) to the CAA, 42 U.S.C. § 7412(r).

16. Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), mandates the Administrator to promulgate a list of substances which, in the case of an accidental release, are known to cause or may reasonably be anticipated to cause death, injury, or serious adverse effects to human health or the environment. The list of regulated substances can be found in 40 C.F.R. § 68.130.

17. On June 20, 1996, EPA promulgated a final rule known as the Chemical Accident Prevention Provisions, 40 C.F.R. Part 68, which implements Section 112(r)(7), 42 U.S.C. § 7412(r)(7), of the CAA. The regulations require owners and operators of stationary sources to develop and implement a risk management program that includes a hazard assessment, a prevention program, and an emergency response program. The risk management program is described in a risk management plan that must be submitted to EPA. It must include a hazard assessment to assess the potential effects of an accidental release of any regulated substance, a program for preventing accidental releases of hazardous substances, and a response program

providing for specific actions to be taken in response to an accidental release of a regulated substance, so as to protect human health and the environment.

18. Section 113(d)(1)(B) of the CAA, 42 U.S.C. § 7413(d)(1)(B), authorizes EPA to commence an administrative action to assess civil penalties of not more than \$25,000 per day for each violation of Section 112(r) of the CAA that occurs before January 30, 1997. Section 113(d)(1)(B), as amended by the Debt Collection Improvement Act of 1996 and the subsequent Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. Part 19, authorizes EPA to commence an administrative action to assess civil penalties of not more than \$32,500 per day for each violation of Section 112(r) of the CAA that occurs after March 15, 2004 through January 12, 2009, and \$37,500 per day for each violation of Section 112(r) of the CAA that occurs after January 12, 2009. Section 113(d)(1)(B) limits this authority, in relevant part, to matters where the first alleged date of violation occurred no more than 12 months prior to the initiation of the administrative action, except where the Administrator and the Attorney General jointly determine that a matter involving a longer period of violation is appropriate for administrative penalty action. By letter dated December 9, 2016, from Thomas A. Mariani, Jr., Chief, Environmental Enforcement Section, United States Department of Justice (“DOJ”), to Gregory A. Sullivan, Acting Director, Waste and Chemical Enforcement Division, EPA, DOJ and EPA jointly decided that, until September 30, 2018 and with certain exceptions not relevant here, violations of 40 C.F.R. Part 68 are appropriate for administrative penalty action.

19. Section 112(r)(2)(C) of the CAA, 42 U.S.C. § 7412(r)(2)(C), defines “stationary source,” as “any buildings, structures, equipment, installations, or substance emitting stationary activities (i) which belong to the same industrial group, (ii) which are located on one or more contiguous properties, (iii) which are under the control of the same person (or persons under common control), and (iv) from which an accidental release may occur.”

20. The regulations at 40 C.F.R. § 68.3 define “threshold quantity” as the quantity specified for regulated substances pursuant to Section 112(r)(5) of the CAA, 42 U.S.C. § 7412(r)(5), listed in 40 C.F.R. § 68.130, Table 1, and determined to be present at a stationary source as specified in 40 C.F.R. § 68.115.

21. The regulations at 40 C.F.R. § 68.3 define “regulated substance” as any substance listed pursuant to Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), in 40 C.F.R. § 68.130.

22. The regulations at 40 C.F.R. § 68.3 define “process” as any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

23. Respondent has handled and/or stored at the Facility more than 10,000 pounds of anhydrous ammonia, the threshold quantity of a regulated substance in a process since 2005.

24. Based on available information, including the Inspection, EPA has determined that Respondent did not follow recognized and generally accepted good engineering practices in designing and maintaining the Facility's anhydrous ammonia refrigeration processes by failing to follow Section 13 of IIAR 2 requirements in the following:

- a. Section 13.3.7.1 of IIAR 2 requires that all exhaust fans discharge vertically with a minimum velocity of 2500 feet per minute. During the Inspection, EPA determined that the exhaust fans located in Machinery Rooms #2 and #3 discharged horizontally, rather than vertically.
- b. Section 13.3.4 of IIAR 2 requires that discharge to air be to the outdoors "in a manner that will not cause a nuisance or danger" and exhaust from mechanical ventilation systems shall be discharged "no less than 20 feet from a property line." EPA determined during the Inspection that the discharge from a horizontal exhaust fan occurred less than 20 feet from the Facility property line adjacent to Business Route 50 (Maryland Highway).
- c. Section 13.2 of IIAR 2 requires that each refrigeration machinery room contain at least two refrigerant detectors that activate a visual and audible alarm and mechanical ventilation. The alarms notify employees that ammonia has been detected at certain concentrations. The detector also activates mechanical ventilation to remove ammonia from the machinery room. EPA determined during the Inspection that the Facility did not have visual and audible alarms inside all refrigeration machinery rooms and outside each entrance to each refrigeration machinery room.
- d. Section 13.1.4 of IIAR 2 and Section 8.11.2 of ASHRAE 15 require that no opening be present that would allow the passage of escaping refrigerant to other parts of the building. During the Inspection, EPA observed two large openings between Machinery Room #1 and the boiler room.

25. On December 17, 2014, EPA and Respondent entered into an Administrative Settlement Agreement and Order on Consent, EPA Docket No. CAA-03-2015-0083DA ("ASAOC"), pursuant to the authority of Section 113(a)(3)(B) of the CAA, 42 U.S.C. § 7413(a)(3)(B). The ASAOC required Respondent to take certain actions at the Facility as specified in Paragraph 34 of the ASAOC (hereafter the "Work").

26. Respondent submitted a completion report for the Work under the ASAOC on February 26, 2016. The completion report verified that Respondent fully complied with the requirements of Paragraph 34 of the ASAOC in accordance with an EPA-approved Work Plan and Schedule. EPA approved the completion report pursuant to Subparagraph 34.g of the ASAOC, upon which the ASAOC was terminated by operation of Paragraph 58 of the ASAOC.

**CONCLUSIONS OF LAW RELATED TO THE
VIOLATIONS OF SECTION 112(r) OF THE CLEAN AIR ACT**

27. The findings of fact and conclusions of law contained in Paragraphs 5 through 25 of this CA/FO are incorporated by reference herein as though fully set forth at length.

28. Anhydrous ammonia is a regulated substance pursuant to Section 112(r)(2) and (3) of the CAA, 42 U.S.C. § 7412(r)(2) and (3), and is listed at 40 C.F.R. § 68.130, with a threshold quantity of 10,000 pounds.

29. At all times relevant to this Consent Agreement, anhydrous ammonia has been present in a process at the Facility in an amount exceeding its threshold quantity.

30. Respondent is a “person” as defined by Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

31. Respondent has been the owner and operator of a “stationary source,” as the term is defined at 40 C.F.R. § 68.3, since at least 1999.

32. Respondent is subject to the requirements of Section 112(r) of the CAA, 40 U.S.C. § 7412(r), and 40 C.F.R. Part 68, because it is the owner and/or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process.

33. The Facility is a Program 3 Facility under the Chemical Accident Prevention Provisions, in accordance with 40 C.F.R. § 68.10(d).

34. Respondent has violated Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7), and its regulations at 40 C.F.R. Part 68, by failing to meet the requirements of 40 C.F.R. § 68.65(d)(1)(vi) and (d)(2), from the date of the Inspection until Respondent submitted to EPA a completion report for the Work, as set forth above. Respondent is, therefore, subject to the assessment of penalties under Section 113 of the CAA, 42 U.S.C. § 7413.

SETTLEMENT

35. In full and final settlement and resolution of all allegations referenced in the foregoing Findings of Fact and Conclusions of Law, and in full satisfaction of all civil penalty claims pursuant thereto, for the purpose of this proceeding, Respondent consents to the assessment of a civil penalty for the violation of Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7), in the amount of \$56,226.

PAYMENT TERMS

36. Respondent consents to the issuance of this Consent Agreement and consents, for purposes of settlement, to the payment of the civil penalty cited in the foregoing Paragraph.

37. The Civil Penalty shall become due and payable immediately upon Respondent's receipt of a true and correct copy of this CA/FO. In order to avoid the assessment of interest, administrative costs, and late payment penalties in connection with the civil penalty described in this CA/FO, Respondent shall pay the civil penalty of \$56,226 no later than thirty (30) days after the date on which a copy of the CAFO is mailed or hand-delivered to Respondent by either cashier's check, certified check, or electronic wire transfer, as set forth in the following paragraphs.

38. Payment of the \$56,226 civil penalty shall be made in the following manner:

- a. All payments by Respondent shall reference Respondent's name and address, and the Docket Number of this action, **CAA-03-2017-0074**;
- b. All checks shall be made payable to **United States Treasury**;
- c. All payments made by check and sent by regular mail shall be addressed to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000
Contact: Heather Russell (513-487-2044)

- d. All payments made by check and sent by overnight delivery service shall be addressed for delivery to:

U.S. EPA
Government Lockbox 979077
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63101
Contact: 314-418-1028

- e. All payments made by check in any currency drawn on banks with no USA branches shall be addressed for delivery to:

U.S. EPA
Cincinnati Finance
26 W. Martin Luther King Drive, MS-002
Cincinnati, OH 45268-0001

- f. All payments made by electronic wire transfer shall be directed to:

Federal Reserve Bank of New York
ABA = 021030004

Account No. = 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York, NY 10045

Field Tag 4200 of the Fedwire message should read:
D 68010727 Environmental Protection Agency

- g. All electronic payments made through the Automated Clearinghouse (ACH), also known as Remittance Express (REX), shall be directed to:

U.S. Treasury REX /Cashlink ACH Receiver
ABA = 051036706
Account No.: 310006, Environmental Protection Agency
CTX Format Transaction Code 22 - Checking

Physical location of U.S. Treasury facility:
5700 Rivertech Court
Riverdale, MD 20737
Contact: Randolph Maxwell 202-874-3720
or REX, 1-866-234-5681

- h. Online Payment Option:

WWW.PAY.GOV

Enter sfo 1.1 in the search field. Open and complete the form.

- i. Additional payment guidance is available at:

http://www.epa.gov/ocfo/finservices/make_a_payment.htm

39. Respondent shall submit copies of checks, verification of wire transfer or ACH to the following persons:

Lydia Guy (3RC00)
Regional Hearing Clerk
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

and

Susan T. Hodges (3RC43)
Assistant Regional Counsel
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

40. The CAA Penalty stated herein is based upon Complainant's consideration of a number of factors, including, but not limited to, the penalty criteria set forth in Section 113(e) of the CAA, 42 U.S.C. § 7413(e), and is consistent with 40 C.F.R. Part 19 and the *Combined*

Enforcement Policy for Clean Air Act Sections 112(r)(1), 112(r)(7) and 40 C.F.R. Part 68 (June 2012).

41. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, EPA is entitled to assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim, as more fully described below. Accordingly, Respondent's failure to make timely payment in accordance with this CA/FO or to comply with the conditions in this CA/FO shall result in the assessment of late payment charges, including interest, penalties, and/or administrative costs of handling delinquent debts.

42. In accordance with 40 C.F.R. § 13.11(a)(1), interest on the civil penalty assessed in this CA/FO will begin to accrue on the date that a copy of this fully executed CA/FO is mailed or hand-delivered to Respondent. However, EPA will not seek to recover interest on any amount of the civil penalties that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a).

43. The costs of the Agency's administrative handling of overdue debts will be charged and assessed monthly throughout the period the debt is overdue in accordance with 40 C.F.R. § 13.11(b). Pursuant to Appendix 2 of Resources Management Directives - Cash Management, Chapter 9, EPA will assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the penalties become due and payable and an additional \$15.00 for each subsequent thirty (30) day period the penalties remain unpaid.

44. A penalty charge of six (6) percent per year will be assessed monthly on any portion of the civil penalties which remain delinquent more than ninety (90) calendar days in accordance with 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on the debt be required, it shall accrue from the first day payment is delinquent, in accordance with 31 C.F.R. § 901.9(d).

45. Failure by Respondent to pay the CAA civil penalty assessed by the Final Order in full in accordance with this CA/FO may subject Respondent to a civil action to collect the assessed penalty, plus interest, pursuant to Section 113 of the CAA, 42 U.S.C. § 7413. In any such collection action, the validity, amount and appropriateness of the penalty shall not be subject to review.

GENERAL PROVISIONS

46. For the purpose of this proceeding, Respondent expressly waives its right to a hearing and to appeal the Final Order under Section 113(d)(2) of the CAA, 42 U.S.C. § 7413(d)(2).

47. The provisions of the CA/FO shall be binding upon Respondent, its officers, directors, agents, servants, employees, and successors or assigns. By his or her signature

below, the person signing this Consent Agreement on behalf of Respondent is acknowledging that he or she is fully authorized by the party represented to execute this Consent Agreement and to legally bind Respondent to the terms and conditions of the Consent Agreement and accompanying Final Order.

48. This CA/FO resolves only the civil penalty claims for the specific violations alleged in this Consent Agreement. Complainant reserves the right to commence action against any person, including Respondent, in response to any condition which Complainant determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. Nothing in this CA/FO shall be construed to limit the United States authority to pursue criminal sanctions. In addition, this settlement is subject to all limitations on the scope of resolution and the reservation of rights set forth in 40 C.F.R. § 22.18(c). Further, Complainant reserves any rights and remedies available to it under the CAA the regulations promulgated thereunder, and any other federal laws or regulations for which Complainant has jurisdiction, to enforce the provisions of this Consent Agreement and accompanying Final Order following its filing with the Regional Hearing Clerk.

49. By signing this Consent Agreement, Respondent acknowledges that this CA/FO will be available to the public and agrees that this CA/FO does not contain any confidential business information or personally identifiable information.

50. By signing this Consent Agreement, both parties agree that each party's obligations under this Consent Agreement and attached Final Order constitute sufficient consideration for the other party's obligations.

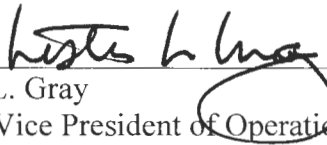
51. Penalties paid pursuant to this Consent Agreement shall not be deductible for purposes of federal taxes.

52. By signing this Consent Agreement, Respondent certifies that the information it has supplied concerning this matter was at the time of submission true, accurate, and complete for each such submission, response, and statement. Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.

53. This Consent Agreement constitutes the entire agreement and understanding of the parties and supersedes any prior agreements or understandings, whether written or oral, among the parties with respect to the subject matter hereof.

54. Each party to this action shall bear its own costs and attorney's fees.

FOR PERDUE FOODS LLC



Lester L. Gray
Senior Vice President of Operations

4-10-17
DATE

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY



Karen Melvin, Director
Hazardous Site Cleanup Division

APR 18 2017

DATE

**BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III**

In the Matter of:

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) **EPA Docket No.: CAA-03-2017-0074**
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**Perdue Foods LLC
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Respondent.

**Salisbury Processing Plant
521 Willow Street
Salisbury, Maryland 21801,**

Facility.

FINAL ORDER

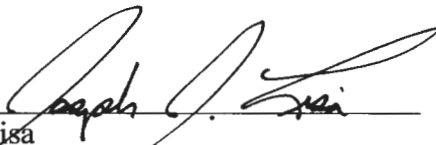
Complainant, the Director of the Hazardous Site Cleanup Division, U.S. Environmental Protection Agency, Region III, and Respondent, Perdue Foods LLC, have executed a document entitled "Consent Agreement," which I hereby ratify as a Consent Agreement in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22 (with specific reference to Sections 22.13(b) and 22.18(b)(2) and (3)). The terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated into this Final Order as if fully set forth at length herein.

Based on the representations of the parties in the attached Consent Agreement, the penalty agreed to therein is based upon consideration of, *inter alia*, the statutory factors set forth in Section 113(e) of the Clean Air Act ("CAA"), 42 U.S.C. § 7413(e), and EPA's *Combined Enforcement Policy for Clean Air Act Sections 112(r)(1), 112(r)(7), and 40 C.F.R. Part 68* (June 2012).

NOW, THEREFORE, PURSUANT TO Section 113(d) of the CAA, 42 U.S.C. § 7413(d), and Section 22.18(b)(3) of the Consolidated Rules of Practice, **IT IS HEREBY ORDERED** that Respondent pay a civil penalty of **FIFTY-SIX THOUSAND TWO HUNDRED AND TWENTY-SIX DOLLARS (\$56,226)**, in accordance with the payment provisions set forth in the Consent Agreement, and comply with the terms and conditions of the Consent Agreement.

The effective date of the attached Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

April 25, 2017
Date



Joseph J. Lisa
Regional Judicial and Presiding Officer
U.S. EPA Region III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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Administrative Services
Environmental Protection Agency
Philadelphia, PA 19103-2029

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the date provided below, I hand-delivered and filed the original of Consent Agreement and Final Order, along with enclosures and/or attachments, for the above-referenced matter, with the Regional Hearing Clerk, EPA Region III, 1650 Arch Street, Philadelphia, Pennsylvania 19103-2029, and that a true and correct copy of the Consent Agreement and Final Order, along with its enclosures and/or attachments, was sent to:

Via Overnight Mail

G. Andrew Getty, Esq.
Perdue Foods LLC
31149 Old Ocean City Road
Salisbury, Maryland 21804

4/25/17
Date

Suzanne M. Parent
Suzanne M. Parent
Associate Regional Counsel