



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 28 2018

REPLY TO THE ATTENTION OF

VIA E-MAIL

William F. Sears, Plant Manager
AOC, LLC
2552 Industrial Drive
Valparaiso, Indiana 46383
Email: lmynatt@bakerdonelson.com

Dear Mr. Sears:

Enclosed is a file-stamped Consent Agreement and Final Order (CAFO) which resolves AOC, LLC, docket no. CAA-05-2018-0032. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on *September 28, 2018*.

Pursuant to paragraph 27 of the CAFO, AOC, LLC must pay the civil penalty within 30 days of the filing date. Your check or electronic funds transfer must display the case name and case docket number.

Please direct any questions regarding this case to Sarah Stillman, Associate Regional Counsel, 312-886-3611.

Sincerely,



Nathan Frank, Chief
Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure

cc: Ann Coyle, Regional Judicial Officer/C-14J
Regional Hearing Clerk/E-19J
Sarah Stillman/C-14J
Phil Perry, Chief
Air Compliance Branch
Office of Air Quality
Indiana Department of Environmental Management
PPERRY@idem.IN.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)	Docket No. CAA-05-2018-0032
)	
AOC, LLC)	Proceeding to Assess a Civil Penalty
Valparaiso, Indiana)	Under Section 113(d) of the Clean Air Act,
)	42 U.S.C. § 7413(d)
Respondent.)	
_____)	

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 113(d) of the Clean Air Act (the CAA), 42 U.S.C. § 7413(d), and Sections 22.1(a)(2), 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), as codified at 40 C.F.R. Part 22.

2. Complainant is the Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5.

3. Respondent is AOC, LLC (AOC), a corporation doing business in Indiana.

4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO and its right to appeal this CAFO.

Statutory and Regulatory Background

9. On August 18, 1995, EPA approved the State of Indiana's Federally Enforceable State Operating Permit (FESOP) program as part of the federally enforceable SIP for Indiana. 60 Fed. Reg. 43,008. Indiana's FESOP program became effective on October 17, 1995.

10. On February 12, 2009, the Indiana Department of Environmental Management (IDEM) issued FESOP Renewal No. F127-25003-00003 to AOC (the 2009 FESOP). On October 27, 2011, IDEM issued Administrative Amendment No. F127-30894-00003 to update the 2009 FESOP (the 2011 FESOP). On February 12, 2016, IDEM issued Administrative Amendment No. F127-36700-00003 to update the 2009 FESOP (the 2016 FESOP).

11. Condition D.2.1 of the 2011 FESOP and Condition D.2.1 of the 2016 FESOP require, among other things, that the facility maintain an overall efficiency of 99.75 percent (%) for the thermal oxidizer.

12. Condition D.2.3 of the 2011 FESOP and Condition D.2.3 of the 2016 FESOP require that AOC operate the thermal oxidizer at all times that the reactors are in operation.

13. Condition D.2.5(d) of the 2011 FESOP and Condition D.2.5(d) of the 2016 FESOP require that AOC operate the thermal oxidizer at or above the minimum 3-hour average temperature determined from the most recent compliant stack test.

14. Condition D.2.6 of the 2011 FESOP and Condition D.2.6 of the 2016 FESOP require that AOC maintain the duct pressure or fan amperage within the normal range as established in the most recent compliant stack test. If the duct pressure or fan amperage is outside the respective established range, AOC shall take response steps in accordance with the 2011 or 2016 FESOP. Failure to take response steps in accordance with the 2011 or 2016 FESOP shall be considered a deviation from the applicable FESOP.

15. The Administrator of EPA (the Administrator) may assess a civil penalty of up to \$37,500 per day of violation up to a total of \$320,000 for CAA violations that occurred after December 6, 2013 through November 2, 2015 and \$46,192 per day of violation up to a total of \$369,532 for violations that occurred after November 2, 2015 under Section 113(d)(1) of the CAA, 42 U.S.C. § 7413(d)(1), and 40 C.F.R. Part 19.

16. Section 113(d)(1) of the CAA 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.

17. 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.

Factual Allegations and Alleged Violations

18. AOC owns and operates a manufacturing facility, located at 2552 Industrial Drive, Valparaiso, Indiana that makes polyester resin solutions in styrene (the Facility).

19. On March 9, 2017, EPA inspected the Facility. After the inspection, EPA requested information from AOC via a March 13, 2017 electronic mail message and AOC submitted the information on March 16, 2017. On July 21, 2017, EPA issued AOC a Request for Information (RFI) pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), which was received by AOC on July 26, 2017. On August 21, 2017, AOC submitted its response to the RFI.

20. In its response to the RFI, AOC stated that its thermal oxidizer was tested on September 10-11, 2009. The test indicated that the destruction efficiency of the thermal oxidizer was above 99.76 % with an average temperature of 1458°F. On September 4, 2014, AOC had testing conducted on its thermal oxidizer, the most recent compliant stack test. The test indicated that the destruction efficiency was above 99.76 % with an average temperature of 1482°F. During the test, the fan duct pressure was measured every 15 minutes and the average fan duct pressure was 25.33 ounces per square inch (oz/in²).

21. Based on the information collected during its inspection of the Facility and the information submitted to EPA after the inspection and in response to the July 21, 2017 RFI, EPA issued AOC a notice and finding of violation (NOV/FOV) on March 9, 2018.

22. On April 3, 2018, EPA received information from AOC regarding the NOV/FOV and on April 4, 2018, representatives from EPA and AOC met to discuss the NOV/FOV. AOC provided additional information in response to the NOV/FOV on June 27, 2018.

23. For at least one 3-hour period on 19 days from January 12, 2014 to July 26, 2017, AOC failed to operate the thermal oxidizer at or above the minimum 3-hour average temperature of 1458°F or 1482°F determined from the most recent compliant stack tests, in violation of Condition D.2.5 of both the 2011 FESOP and the 2016 FESOP. See Table 1 in Enclosure A.

24. On 203 days from January 1, 2015 to July 4, 2017, AOC failed to maintain the thermal oxidizer combustion fan duct pressure at the 25.33 oz/in² minimum value established during the September 4, 2014 stack test and AOC did not take any response steps, in violation of Conditions D.2.6 and C.15 of the 2011 FESOP and the 2016 FESOP. See Table 2 in Enclosure A.

25. On four days from July 27, 2014 to May 11, 2017, AOC failed to operate the thermal oxidizer when one or more of its reactors was operating, in violation of Condition D.2.3 of the 2011 FESOP and the 2016 FESOP. See Table 3 in Enclosure A.

Civil Penalty

26. Based on analysis of the factors specified in Section 113(e) of the CAA, 42 U.S.C. § 7413(e), the facts of this case and AOC's cooperation, Complainant has determined that an appropriate civil penalty to settle this action is \$104,608.63.

27. Within 30 days after the effective date of this CAFO, Respondent must pay the \$104,608.63 civil penalty by one of the following methods:

- a. sending a cashier's or certified check, payable to "Treasurer, United States of America," via US postal mail to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

The check must note Respondent's name and the docket number of this CAFO;

- b. sending a cashier's or certified check, payable to "Treasurer, United States of America," via non-US postal mail to:

U.S. Bank
Government Lockbox 979077
U.S. EPA Fines and Penalties

1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, Missouri 6310

The check must note Respondent's name and the docket number of this CAFO;

- c. electronic funds transfer, payable to "Treasurer, United States of America," and sent to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read:
"D68010727 Environmental Protection Agency"

In the comment or description field of the electronic funds transfer, state

Respondent's name and the docket number of this CAFO; or

- d. an on-line payment. To pay on-line, go to www.pay.gov. Use the Search Public Forms option on the tool bar and enter SFO 1.1 in the search field. Open the form and complete the required fields.

28. Respondent must send a notice of payment that states Respondent's name and the docket number of this CAFO to EPA at the following addresses when it pays the penalty:

Attn: Compliance Tracker (AE-18J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Sarah Stillman (C-14J)
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Regional Hearing Clerk (E-19J)
U.S. Environmental Protection Agency, Region 5

77 W. Jackson Boulevard
Chicago, Illinois 60604

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

30. If Respondent does not pay timely the civil penalty, EPA may request the Attorney General of the United States to bring an action to collect any unpaid portion of the penalty with interest, nonpayment penalties and the United States enforcement expenses for the collection action under Section 113(d)(5) of the CAA, 42 U.S.C. § 7413(d)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

31. Respondent must pay the following on any amount overdue under this CAFO: interest accrued on any overdue amount from the date payment was due at a rate established by the Secretary of the Treasury pursuant to 26 U.S.C. § 6621(a)(2); the United States enforcement expenses, including but not limited to attorneys' fees and costs incurred by the United States for collection proceedings; a quarterly nonpayment penalty each quarter during which the assessed penalty is overdue which will be 10 percent of the aggregate amount of the outstanding penalties and nonpayment penalties accrued from the beginning of the quarter. 42 U.S.C. § 7413(d)(5).

General Provisions

32. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: stillman.sarah@epa.gov (for Complainant), and lmynatt@bakerdonelson.com (for Respondent).

33. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in this CAFO.

34. The effect of the settlement described in this CAFO is conditioned upon the accuracy of Respondent's representations to EPA, as memorialized in Respondent's response to the RFI, and its updated NOV/FOV response letter dated June 27, 2018.

35. The CAFO does not affect the rights of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violation of law.

36. This CAFO does not affect Respondent's responsibility to comply with the CAA and other applicable federal, state and local laws. Except as provided in paragraph 33, above, compliance with this CAFO will not be a defense to any actions subsequently commenced pursuant to federal laws administered by EPA.

37. Respondent certifies that it is complying fully with its FESOP.

38. This CAFO constitutes an "enforcement response" as that term is used in EPA's Clean Air Act Stationary Civil Penalty Policy (October 25, 1991) to determine Respondent's "full compliance history" under Section 113(e) of the CAA, 42 U.S.C. § 7413(e).

39. The terms of this CAFO bind Respondent, its successors and assigns.

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

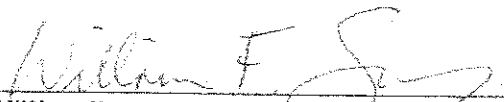
41. Each party agrees to bear its own costs and attorneys' fees in this action.

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

AOC, LLC, Respondent


9/28/18

Date


William F. Sears, Plant Manager
AOC, LLC

United States Environmental Protection Agency, Complainant

9/28/18
Date


Edward Nam
Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

Consent Agreement and Final Order
In the Matter of: AOC, LLC
Docket No. CAA-05-2018-0032

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

9-28-18
Date

James D. Payne for
~~Ann L. Coyle~~ Cathy Steff
~~Regional Judicial Officer~~ Regional Administrator
U.S. Environmental Protection Agency
Region 5

AOC, LLC – Enclosure A to Consent Agreement and Final Order

Table 1: 3-hour periods when the TO operated at or below the minimum 3-hour average temperature of 1458°F or 1482°F determined from the September 10-11, 2009 and September 4, 2014 stack tests

Date of Exceedance	3-hour Period	3-hour Average Temperature
03/09/2013	12:00AM - 3:00AM	1388.85°F
05/04/2013	12:00PM - 3:00PM	1380.95°F
01/12/2014	12:00PM - 3:00PM	1446.25°F
08/23/2014	9:00AM - 12:00PM	1419.5°F
09/20/2014	3:00PM - 6:00PM	1462.3°F
11/17/2014	6:00PM - 9:00PM	1263.4°F
11/17/2014	9:00PM - 12:00AM	1234.6°F
01/09/2015	9:00PM - 12:00AM	1358.6°F
02/15/2015	3:00PM - 6:00PM	1051.68°F
05/13/2015	12:00PM - 3:00PM	1209.33°F
05/13/2015	3:00PM - 6:00PM	1244.48°F
05/21/2015	9:00PM - 12:00AM	1265.78°F
05/22/2015	12:00AM - 3:00AM	1275.53°F
07/02/2015	3:00PM - 6:00PM	1477.15°F
07/22/2015	12:00PM - 3:00PM	1460.83°F
01/01/2016	12:00PM - 3:00PM	1463.6°F
02/19/2016	12:00AM - 3:00AM	1427.35°F
02/19/2016	3:00AM - 6:00AM	1442.61°F
06/23/2016	6:00AM - 9:00AM	1420.62°F
06/24/2016	6:00AM - 9:00AM	1316.38°F

12/02/2016	9:00AM - 12:00PM	1198.31°F
05/10/2017	9:00PM - 12:00AM	1396.91°F
05/11/2017	12:00AM - 3:00AM	1037.77°F
05/17/2017	6:00AM - 9:00AM	1481.46°F
07/12/2017	6:00PM - 9:00PM	1459.59°F

Table 2: Days when the TO combustion fan duct pressure operated less than the 25.33 oz/in² minimum value established during the September 4, 2014 stack test and no response steps were taken

Date	Duct Pressure oz/ in ² (M) morning; (E) evening	Response Corrective Actions
1/1/15	(M) 23; (E) 15	None
1/2/15	(M) 22; (E) 22	None
1/4/15	(M) 18; (E) 22	None
1/5/15	(M) 24; (E) 24	None
1/6/15	(M) 23; (E) 23	None
1/7/15	(M) 25; (E) 25	None
1/8/15	(M) 24; (E) 24	None
1/9/15	(M) 25	None
1/10/15	(M) 25	None
1/11/15	(M) 21; (E) 22	None
1/12/15	(M) 23; (E) 22	None
1/13/15	(M) 24; (E) 22	None
1/14/15	(M) 24; (E) 15	None
1/15/15	(M) 22; (E) 24	None
1/16/15	(M) 22; (E) 22	None
1/17/15	(M) 19; (E) 22	None
1/18/15	(M) 22; (E) 22	None
1/19/15	(M) 22; (E) 21	None
1/20/15	(M) 21; (E) 22	None
1/21/15	(M) 22; (E) 22	None
1/22/15	(M) 20; (E) 22	None
1/23/15	(M) 20; (E) 20	None
1/24/15	(M) 19; (E) 18	None
1/25/15	(M) 20; (E) 23	None
1/26/15	(M) 18; (E) 18	None
1/27/15	(M) 22; (E) 20	None
1/28/15	(M) 24; (E) 20	None
1/29/15	(M) 22; (E) 22	None
1/30/15	(M) 24; (E) 24	None
1/31/15	(M) 24; (E) 22	None
2/1/15	(M) 22; (E) 22	None
2/2/15	(M) 23	None
2/3/15	(M) 25; (E) 25	None
2/4/15	(M) 24; (E) 22	None
2/6/15	(E) 25	None
2/7/15	(M) 24; (E) 22	None
2/8/15	(M) 25; (E) 24	None
2/10/15	(M) 25; (E) 24	None
2/11/15	(M) 22; (E) 25	None
2/14/15	(M) 21; (E) 24	None
2/16/15	(M) 24; (E) 25	None

2/17/15	(M) 24; (E) 23	None
2/18/15	(M) 23; (E) 24	None
2/19/15	(E) 24	None
2/20/15	(E) 25	None
2/21/15	(M) 25; (E) 22	None
2/22/15	(M) 23; (E) 22	None
2/24/15	(M) 24; (E) 24	None
2/25/15	(M) 24; (E) 24	None
2/26/15	(M) 25; (E) 24	None
2/27/15	(M) 25; (E) 25	None
2/28/15	(M) 25; (E) 24	None
3/1/2015	(M) 24; (E) 24	None
3/2/2015	(M) 25; (E) 25	None
3/3/2015	(M) 23; (E) 23	None
3/4/2015	(M) 24	None
3/5/2015	(M) 25	None
3/6/2015	(M) 25; (E) 24	None
3/7/2015	(M) 20	None
3/8/2015	(M) 24	None
3/9/2015	(M) 23	None
3/10/2015	(M) 21; (E) 22	None
3/11/2015	(M) 22; (E) 23	None
3/12/2015	(M) 22; (E) 22	None
3/13/2015	(M) 23; (E) 23	None
3/14/2015	(M) 20; (E) 22	None
3/15/2015	(M) 21; (E) 20	None
3/16/2015	(M) 22; (E) 22	None
3/17/2015	(M) 24; (E) 22	None
3/18/2015	(M) 22; (E) 23	None
3/19/2015	(M) 22; (E) 22	None
3/20/2015	(M) 22; (E) 22	None
3/21/2015	(M) 24; (E) 24	None
3/22/2015	(M) 22; (E) 24	None
3/24/2015	(M) 24; (E) 24	None
3/25/2015	(M) 23; (E) 22	None
3/26/2015	(M) 24; (E) 21	None
3/27/2015	(M) 22; (E) 23	None
3/28/2015	(M) 22; (E) 21	None
3/29/2015	(M) 25; (E) 20	None
3/30/2015	(M) 22; (E) 21	None
3/31/2015	(M) 20; (E) 19	None
4/1/2015	(M) 21; (E) 18	None
4/2/2015	(M) 20; (E) 20	None
4/3/2015	(M) 19; (E) 19	None
4/5/2015	(M) 22; (E) 20	None
4/6/2015	(M) 18; (E) 18	None

4/7/2015	(M) 18; (E) 25	None
4/8/2015	(M) 18; (E) 20	None
4/9/2015	(M) 18; (E) 18	None
4/10/2015	(M) 20; (E) 21	None
4/11/2015	(M) 21; (E) 20	None
4/12/2015	(M) 20; (E) 20	None
4/13/2015	(M) 20; (E) 20	None
4/14/2015	(M) 18; (E) 20.5	None
4/15/2015	(M) 17; (E) 17	None
4/16/2015	(M) 18; (E) 17	None
4/17/2015	(M) 20	None
4/19/2015	(E) 21	None
4/24/2015	(M) 20	None
4/25/2015	(M) 20	On 4/28/2015, cleaned filter due to low pressure.
5/3/2015	(E) 24	None
5/4/2015	(E) 25	None
5/5/2015	(M) 24	None
5/6/2015	(E) 20	None
5/7/2015	(M) 22; (E) 21	None
5/8/2015	(E) 17	None
5/9/2015	(M) 20; (E) 22	None
5/11/2015	(M) 25; (E) 18	None
5/12/2015	(M) 19; (E) 19	None
5/13/2015	(M) 18; (E) 18	None
5/14/2015	(M) 25; (E) 24	None
5/15/2015	(E) 21	None
5/16/2015	(M) 22; (E) 20	None
5/17/2015	(M) 18; (E) 16	None
5/18/2015	(M) 25; (E) 22	None
5/19/2015	(M) 20; (E) 12	None
5/20/2015	(M) 18; (E) 20	None
5/21/2015	(M) 20; (E) 22	None
5/22/2015	(M) 17; (E) 12	None
5/23/2015	(M) 14; (E) 10	None
6/11/2015	(M) 24	None
10/2/2015	(E) 24	None
10/10/2015	(M) 3	None
12/12/2015	(M) 25	None
12/14/2015	(M) 25	None
12/21/2015	(M) 25	None
2/1/2016	(E) 16	None
2/2/2016	(E) 18	None
2/7/2016	No reading	None
2/8/2016	(E) 25	None

2/15/2016	(E) 20	None
2/19/2016	(M) 25; (E) 22	None
2/21/2016	(M) 25; (E) 24	None
2/23/2016	(E) 24	None
2/24/2016	(E) 25	None
3/9/2016	(M) 24; (E) 23	None
3/11/2016	(M) 25	None
3/16/2016	(M) 25	None
3/24/2016	(M) 24	None
3/26/2016	(M) 25	None
3/27/2016	(E) 25	None
3/30/2016	(E) 22	None
3/31/2016	(M) 25; (E) 22	None
4/1/2016	(M) 25; (E) 25	None
4/2/2016	(E) 25	None
4/4/2016	(E) 25	None
4/21/2016	(M) 25; (E) 24	None
4/22/2016	(M) 24	None
4/24/2016	(M) 25	None
4/25/2016	(M) 25; (E) 25	None
2/1/1900	(M) 25; (E) 25	None
4/27/2016	(M) 25; (E) 25	None
4/28/2016	(M) 17; (E) 24	None
4/29/2016	(M) 24; (E) 23	None
4/30/2016	(M) 24; (E) 22	None
5/1/2016	(M) 24; (E) 23	None
5/2/2016	(M) 24; (E) 18	None
5/3/2016	(M) 18; (E) 24	None
5/4/2016	(M) 20; (E) 20	None
5/5/2016	(M) 25; (E) 20	None
5/6/2016	(M) 18	None
5/7/2016	(M) 20; (E) 25	None
5/8/2016	(M) 25; (E) 25	None
5/9/2016	(M) 20; (E) 20	None
5/10/2016	(M) 20; (E) 25	None
5/23/2016	(E) 25	None
5/25/2016	(M) 25; (E) 24	None
5/26/2016	(M) 24; (E) 18	None
5/27/2016	(M) 19	TO blower filter washed 5/27/16
6/5/2016	No reading	None
11/28/2016	(E) 25	None
11/29/2016	(M) 25; (E) 25	None
12/3/2016	No reading	None
12/12/2016	(M) 25	None
12/29/2016	(M) 25	None

12/30/2016	(M) 25	None
12/31/2016	(M) 25	None
1/2/2017	(M) 25	None
1/3/2017	(M) 25; (E) 25	None
1/9/2017	(M) 25	None
1/10/2017	(M) 25	None
1/13/2017	(E) 25	None
1/14/2017	(E) 25	None
1/15/2017	(E) 25	None
1/17/2017	(E) 25	None
1/19/2017	(E) 24	None
1/20/2017	(M) 24; (E) 25	None
1/21/2017	(M) 25; (E) 22	None
1/22/2017	(M) 25	None
1/23/2017	(E) 25	None
1/27/2017	(M) 25	None
1/31/2017	(M) 24	None
2/1/2017	(M) 22	None
2/6/2017	(E) 25	None
2/7/2017	(M) 22	None
2/11/2017	(M) 25; (E) 25	None
2/12/2017	(M) 24	None
2/13/2017	(E) 21	None
2/14/2017	(M) 24; (E) 20	None
2/18/2017	(M) 20; (E) 22	None
2/19/2017	(M) 20; (E) 20	None
2/20/2017	(M) 19; (E) 20	None
2/21/2017	(M) 25	None
2/22/2017	(M) 20	TO blower filter Cleaned 2/24/17
7/4/2017	(M) 25	None

Table 3: Dates and times when the TO was not operating and one or more of the reactors was operating

Thermal Oxidizer Not Operating - Dates and Times	Reactors Operating
On 07/27/2014, from 09:44 to 11:17	Reactor 1 and Reactor 2
On 05/14/2015, from 10:41 to 12:17	Reactor 1 and Reactor 2
On 05/14/2015, from 14:15 to 16:56	Reactor 1 and Reactor 2
From 05/10/2017 at 22:35 until 05/11/17 at 2:37	Reactor 1 and Reactor 2

Consent Agreement and Final Order
In the matter of: AOC, LLC
Docket Number: CAA-05-2018-0032

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, docket number CAA 05 2018 0032, which was filed on 9/28/2018, in the following manner to the following addressees:

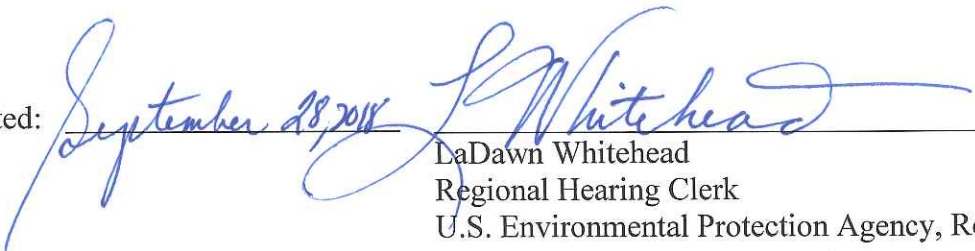
Copy by E-mail to Respondent: William F. Sears
bsears@aoc-resins.com

Copy by E-mail to
Attorney for Complainant: Sarah Stillman
stillman.sarah@epa.gov

Copy by E-mail to
Attorney for Respondent: Mary LeAnn Mynatt
lmynatt@bakerdonelson.com

Copy by E-mail to
Regional Judicial Officer: Ann Coyle
coyle.ann@epa.gov

Dated:

September 28, 2018 
LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5