

**BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

REGION III

In the Matter of:

**George Mason University
4400 University Drive
Fairfax, VA 22030,**

Respondent.

EPA Docket No. CWA-03-2016-0144

FINAL ORDER

**Proceeding Under Section 311(b)(3), 311(j),
and 311(b)(6)(B)(i) of the Clean Water Act, 33
U.S.C. § 1321(b)(3), 1321(j) and 1321(b)(6)(B)(i)**

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FINAL ORDER

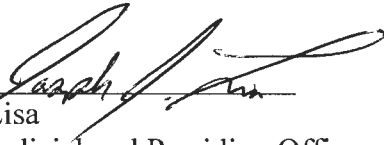
Complainant, the Acting Director of the Hazardous Site Cleanup Division, U.S. Environmental Protection Agency, Region III, and Respondent, George Mason University, have executed a document entitled "Consent Agreement," which I hereby ratify as a Consent Agreement in accordance with the "Consolidated 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 references to Section 22.13(b), 22.18(b)(2) and (3), and 22.1(b) and 22.50(a)(1). 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 upon the representations of the parties in the attached Consent Agreement, the penalty agreed to therein is based upon consideration of, *inter alia*, EPA's *Civil Penalty Policy for Section 311(b)(3) and Section 311(j) of the Clean Water Act* (August 1998) and the statutory factors set forth in Section 311(b)(8) of the CWA, 33 U.S.C. § 1321(b)(8).

NOW, THEREFORE, PURSUANT TO Section 311(b)(6)(B)(i) of the CWA, as amended, and Section 22.18(b)(3) of the Consolidated Rules of Practice, **IT IS HEREBY ORDERED** that Respondent pay a civil penalty in the amount of **TWENTY THOUSAND NINE HUNDRED AND SIXTY FOUR DOLLARS (\$20,964.00)**, 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 foregoing Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

Date: July 21, 2016



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

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III**

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U.S.C. § 1321(b)(3), 1321(j) and 1321(b)(6)(B)(i)**

CONSENT AGREEMENT

1. This Consent Agreement is proposed and entered into under the authority vested in the Administrator of the U.S. Environmental Protection Agency (“EPA”) by Section 311(b)(6)(B)(i) of the Clean Water Act (“CWA”), as amended, 33 U.S.C. § 1321(b)(6)(B)(i), and under the authority provided by 40 C.F.R. § 22.13(b), 22.18(b)(2) and (3), and 22.50(a)(1) and (b) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (“Part 22 Rules”), 40 C.F.R. Part 22. The Administrator has delegated this authority to the Regional Administrator of EPA, Region III, who in turn has delegated it to the Director of the Region’s Hazardous Site Cleanup Division (“Complainant”).
2. The parties agree to the commencement and conclusion of this matter by issuance of this Consent Agreement and Final Order (collectively “CAFO”), as prescribed by the Part 22 Rules pursuant to 40 C.F.R. § 22.13(b) and 22.18(b), and having consented to the entry of this CAFO, agree to comply with the terms of this CAFO.
3. For purposes of this proceeding only, Respondent admits to the jurisdictional allegations set forth in this Consent Agreement.
4. Respondent neither admits nor denies the specific factual allegations, findings of fact, and conclusions of law set forth in this Consent Agreement, except as provided in Paragraph 3, above.
5. Respondent agrees not to contest EPA’s jurisdiction with respect to the execution, enforcement, and issuance of this CAFO.

6. For purposes of this proceeding only, Respondent hereby expressly waives its right to contest the allegations set forth in this Consent Agreement and any right to appeal the accompanying Final Order.
7. Each party shall bear its own costs and attorney's fees.

Statutory and Regulatory Authority

8. Congress enacted the CWA, 33 U.S.C. §§ 1251 et seq., in 1972.
9. Section 311(b)(3) of the CWA prohibits discharges of oil or hazardous substances into or upon the navigable waters of the United States or adjoining shorelines in such quantities that have been determined may be harmful to the public health or welfare or environment of the United States.
10. Section 311(a)(1) of the Act, 33 U.S.C. § 1321(a)(1), defines "oil" as "oil of any kind or in any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil."
11. Pursuant to 40 C.F.R. § 110.3, discharges of oil that may be harmful include discharges of oil that violate applicable water quality standards or cause a film or a sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon the adjoining shorelines.
12. In Section 311(j)(1)(C) of the CWA, 33 U.S.C. § 1321(j)(1)(C), Congress required the President to promulgate regulations which would, among other things, establish procedures, methods, and other requirements for preventing discharges of oil from onshore facilities into navigable waters and for containing such discharges.
13. By Executive Order 12777, the President delegated the authority to promulgate regulations under Section 311(j) of the CWA to EPA for non-transportation-related onshore and offshore facilities.
14. Pursuant to its delegated authority under Section 311(j) of the CWA, EPA promulgated the Oil Pollution Prevention Regulations, codified at 40 C.F.R. Part 112 (the "Regulations").
15. Pursuant to 40 C.F.R. § 112.1(b), the Regulations apply to any owner or operator of a non-transportation-related onshore or offshore facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil or oil products, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful into or upon the navigable waters of the United States or adjoining shorelines. Pursuant to 40 C.F.R. § 112.1(d), the Regulations do not apply to any owner or operator of

a facility with an aggregate aboveground oil storage capacity of 1,320 gallons or less.

16. According to 40 C.F.R. § 112.3, an owner or operator subject to the Regulations must prepare in writing and implement a Spill Prevention, Control, and Countermeasure (SPCC) plan, in accordance with § 112.7 and any other applicable section, including but not limited to § 112.3 and 112.8.
17. For violations of Sections 311(b)(3) and 311(j) of the CWA, 33 U.S.C. § 1321(b)(3) and (j), EPA has authority, under Section 311(b)(6) of the CWA, 33 U.S.C. § 1321(b)(6), as amended by the Debt Collection Improvement Act and implemented by 40 C.F.R. Part 19, *Adjustment of Civil Monetary Penalties for Inflation*, to file an Administrative Complaint seeking a civil penalty of \$16,000 per violation, up to a maximum of \$37,500, or seeking \$16,000 per day for each day during which a violation continues, up to a maximum of \$177,500, for violations occurring after January 12, 2009.

Findings of Fact and Conclusions of Law

18. Respondent is a public, state owned, university. The university headquarters is located at 4400 University Drive, Fairfax, VA 22030.
19. Respondent is a person within the meaning of Sections 311(a)(7) and 502(5) of the CWA, 33 U.S.C. §§ 1321(a)(7) and 1362(5), and 40 C.F.R. § 112.2.
20. Respondent is the owner and operator of a facility that stores and uses No. 2 diesel fuel, gasoline, and oil and is located at 4400 University Drive, Fairfax, VA 22030 (the "Facility").
21. Respondent is the owner and/or operator of the Facility within the meaning of Section 311(a)(6) of the CWA, 33 U.S.C. § 1321(a)(6), and 40 C.F.R. § 112.2.
22. Respondent has owned and operated the Facility since January 10, 1974, the effective date of the Regulations.
23. The Facility is located approximately 0.5 miles from an unnamed tributary to Rabbit Branch, which is a tributary to Lake Royal, which is a tributary to Pohick Creek, which is a tributary to the Potomac River.
24. The Facility could reasonably be expected to discharge oil in harmful quantities into the above-indicated tributaries and the Potomac River.
25. The Potomac River is a navigable water of the United States within the meaning of Section 502(7) of the CWA, 33 U.S.C. § 1362(7).

26. The Facility is an onshore facility within the meaning of Section 311(a)(10) of the CWA, 33 U.S.C. § 1321(a)(10), and 40 C.F.R. § 112.2.
27. The Facility is a non-transportation-related facility within the meaning of 40 C.F.R. § 112.2 and Appendix A of 40 C.F.R. Part 112, as incorporated by reference within 40 C.F.R. § 112.2.
28. Due to its location, the Facility could reasonably be expected to discharge oil in harmful quantities, as defined by 40 C.F.R. § 110.3, into or upon navigable waters of the United States or adjoining shorelines.
29. Pursuant to 40 C.F.R. § 112.1, Respondent, as the owner and operator of the Facility, is subject to the Regulations codified at 40 C.F.R. Part 112.
30. Pursuant to 40 C.F.R. § 112.3, Respondent was required to prepare in writing and implement an SPCC plan, in accordance with 40 C.F.R. § 112.7 and any other applicable section including but not limited to 40 C.F.R. § 112.3 and 112.8.

A. Findings of Fact and Conclusions of Law – Oil Spill

Count I

31. The findings of fact and conclusions of law contained in Paragraphs 18 through 30 of this CAFO are incorporated by reference herein as though fully set forth at length.
32. On February 24, 2015, pursuant to its authority under Section 308(a) of the Act, 33 U.S.C. § 1318(a), EPA sent Respondent a letter (the “Information Request”) requesting information regarding Respondent’s compliance with Section 311(b)(3) of the Act, 33 U.S.C. § 1321(b)(3), at the Facility in response to a January 17, 2015 spill incident report Respondent made to the National Response Center.
33. On March 26 2015, Respondent submitted to EPA a response to EPA’s Information Request (“Response”).
34. According to the Response, approximately 4,106 gallons of No. 2 diesel fuel was discharged from the Facility on January 17, 2015 due to human error during a routine fuel circulation process.
35. No. 2 diesel fuel is an oil pursuant to 33 U.S.C. § 1321(a)(1).
36. Approximately 3,500 gallons of the 4,106 gallons discharged entered a nearby storm drain, which empties into an unnamed tributary of Rabbit Branch, which flows into Lake Royal and then into Pohick Creek, a tributary of the Potomac

River, a navigable waterway of the United States as defined in Section 502(7) of the Act, 33 U.S.C. § 1362(7), and 40 C.F.R. § 110.1.

37. Respondent's discharge on January 17, 2015 caused a sheen upon the surface of the unnamed tributary of Rabbit Branch.
38. Respondent's discharge on January 17, 2015 was in a quantity that has been determined may be harmful under 40 C.F.R. § 110.3(b), which implements Section 311(b)(3) and (b)(4) of the Act, 33 U.S.C. § 1321(b)(3) and (b)(4).
39. Respondent's discharge into or upon an unnamed tributary of Rabbit Branch in a quantity that has been determined may be harmful under 40 C.F.R. § 110.3 violated Section 311(b)(3) of the Act, 33 U.S.C. § 1321(b)(3).

B. Findings of Fact and Conclusions of Law – SPCC Plan

Count II

40. The finding of fact and conclusions of law contained in Paragraphs 18 through 39 of this CAFO are incorporated by reference herein as though fully set forth at length.
41. On June 2, 2015, EPA conducted an SPCC inspection (the "Inspection") of the Facility in response to the discharge on January 17, 2015 and to determine the Facility's compliance with Section 311(j) of the CWA and its implementing regulations at 40 C.F.R. Part 112.
42. During the Inspection, EPA observed that the Facility had a total aboveground oil storage capacity of approximately 86,318 gallons.
43. At the time of the Inspection, EPA inspectors observed that Respondent failed to prepare in writing an SPCC plan for the Facility, in accordance with 40 C.F.R. § 112.7 and any other applicable section, as follows:
 - a. Pursuant to 40 C.F.R. § 112.3(d), a Licensed Professional Engineer must review and certify the SPCC plan and that by the certification, the Professional Engineer attests, "(i) That he is familiar with the requirements of [the Regulations]; (ii) That he or his agent has visited and examined the facility; (iii) That the Plan has been prepared in accordance with good engineering practice [...]; (iv) That procedures for required inspections and testing have been established; and (v) That the Plan is adequate for the facility." At the time of the Inspection, attestations iii, iv, and v of the Licensed Professional Engineer certification were not made in accordance with the Regulations.

- b. Pursuant to 40 C.F.R. § 112.7, the SPCC plan must follow the sequence specified by the Regulations or, in the alternative, the SPCC plan must include a supplement cross-referencing the location of each item. At the time of the Inspection, the SPCC plan was not written in the sequence set forth in the Regulations nor did it include a supplement cross-referencing the location of each item.
- c. Pursuant to 40 C.F.R. § 112.7(a)(3), the SPCC plan must contain a facility diagram that shows each fixed oil container, transfer stations and connection pipes. The SPCC plan must also address the type of oil in each container, its storage capacity, and the discharge or drainage controls around each container. At the time of the Inspection, the Facility diagram in the SPCC plan omitted certain tanks present at the Facility. Additionally, the SPCC plan identifies the contents of the tank generally as oil and fuel. This description does not provide the physical and chemical characteristics of the oil so that it can be addressed appropriately in the event of a discharge.
- d. Pursuant to 40 C.F.R. § 112.7(b), the SPCC plan must include a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure. At the time of the Inspection, the SPCC plan did not discuss any consequence resulting from any type of major equipment failure.
- e. Pursuant to 40 C.F.R. § 112.7(f), the owner and operator of a facility, subject to the Regulations, must schedule and conduct discharge prevention briefings for oil-handling personnel at least once a year. At the time of the Inspection, the SPCC plan did not discuss discharge prevention briefings.
- f. Pursuant to 40 C.F.R. § 112.8(c)(1), the owner and operator of a facility, subject to the Regulations, must provide complete discussions on bulk storage containers. At the time of the Inspection, there were no discussions in the SPCC plan as to whether container materials are compatible with materials stored.
- g. Pursuant to 40 C.F.R. § 112.8(c)(2), the owner and operator of a facility, subject to the Regulations, must construct all bulk storage tank installations so that it provides a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. At the time of the Inspection, there were no discussions in the SPCC plan as to whether the secondary containment was suitable with respect to freeboard space.
- h. Pursuant to 40 C.F.R. § 112.8(d), the owner and operator of a facility, subject to the Regulations, must provide complete discussions on facility transfer operations and piping. At the time of the Inspection, there were no discussions of above ground or buried piping.

44. Based on EPA's Inspection and EPA's review of information gathered during the Inspection, EPA alleges that Respondent failed to prepare in writing an SPCC plan for the Facility, in accordance with 40 C.F.R § 112.7 and any other applicable section, including but not limited to § 112.3 and 112.8, as required by 40 C.F.R § 112.3 of the Regulations.
45. Failure to prepare in writing an SPCC plan in accordance with 40 C.F.R § 112.7 and any other applicable section, including but not limited to § 112.3 and 112.8, is a violation of 40 C.F.R § 112.3 of the Regulations, issued pursuant to Section 311(j) of the CWA, 33 U.S.C. § 1321(j), which is subject to the assessment of penalties pursuant to Section 311(b)(6) of the CWA, 33 U.S.C. § 1321(b)(6).

Count III

46. The findings of fact and conclusions of law contained in Paragraphs 18 through 45 of this CAFO are incorporated by reference herein as though fully set forth at length.
47. At the time of the Inspection, EPA inspectors observed that Respondent failed to implement an SPCC plan for the Facility, as follows:
 - a. Pursuant to 40 C.F.R. § 112.7(e), the owner and operator of a facility, subject to the Regulations, must develop written procedures for tests and inspections and keep the written procedures and records of these tests and inspections with the SPCC plan for three years. At the time of the Inspection, the written procedures as described in the SPCC Plan required inspections to be conducted monthly; however, the Respondent was not able to produce tank inspections records for inspections conducted from July 2014 to March 2015.
48. Based on EPA's Inspection and EPA's review of information gathered during the Inspection, EPA alleges that Respondent failed to implement an SPCC plan for the Facility, in accordance with 40 C.F.R § 112.7 and any other applicable section, including but not limited to § 112.3 and 112.8, as required by 40 C.F.R § 112.3 of the Regulations.
49. Failure to implement an SPCC plan in accordance with 40 C.F.R § 112.7 and any other applicable section, including but not limited to § 112.3 and 112.8, is a violation of 40 C.F.R § 112.3 of the Regulations, issued pursuant to Section 311(j) of the CWA, 33 U.S.C. § 1321(j), which is subject to the assessment of penalties pursuant to Section 311(b)(6) of the CWA, 33 U.S.C. § 1321(b)(6).

Penalty

50. The penalty was calculated after consideration of the statutory penalty factors in Section 311(b)(8) of the CWA, 33 U.S.C. § 1321(b)(8), which were applied in accordance with EPA's *Civil Penalty Policy for Section 311(b)(3) and Section 311(j) of the Clean Water Act* (August 1998), including the seriousness of the violation; the economic benefit to the violator, if any; the degree of culpability; any other penalty for the same incident; history of prior violations, if any; the nature, extent, and degree of success of the violator's mitigation efforts; the economic impact of the penalty on the violator; and other matters as justice may require.
51. Within thirty (30) days of the effective date of the Final Order, Respondent shall pay a penalty in the amount of **\$20,964.00**. All payments shall be made by a cashier's or certified check, by an electronic funds transfer ("EFT"), or by on-line payment.
- a. If paying by check, Respondent shall submit a cashier's or certified check, payable to "Environmental Protection Agency," and bearing the notation "OSLTF-311." If paying by check, Respondent shall note on the check the title and docket number (CWA-03-2016-0144) of this case.
- b. If Respondent sends payments by the U.S. Postal Service, the payments shall be addressed to:
- U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000
- c. If Respondent sends payments by a private delivery service, the payments shall be addressed to:
- U.S. Environmental Protection Agency
U.S. Bank
1005 Convention Plaza
Mail Station SL-MO-C2GL
St. Louis, MO 63101
Attn: Heather Russell (513) 487-2044
- d. If paying by EFT, the Respondent shall make the transfers to:
- Federal Reserve Bank of New York
ABA 021030004
Account 68010727

33 Liberty Street
New York, NY 10045

- e. If paying by EFT, field tag 4200 of the Fedwire message shall read: “(D 68010727 Environmental Protection Agency).” In the case of an international transfer of funds, the Respondent shall use SWIFT address FRNYUS33.
 - f. If paying through the Department of Treasury’s Online Payment system, please access “www.pay.gov,” and enter sfo 1.1 in the search field. Open the form and complete the required fields and make payments. Note that the type of payment is “civil penalty,” the docket number “CWA-03-2015-0253” should be included in the “Court Order # or Bill #” field, and “3” should be included as the Region number.
52. 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 or to comply with the conditions in this CAFO shall result in the assessment of late payment charges including additional interest, penalties, and/or administrative costs of handling delinquent debts.
53. Interest on the civil penalty will begin to accrue on the date that this CAFO, when fully executed, is mailed or hand-delivered to the Respondent. EPA will not seek to recover interest on any amount of such civil penalty that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Interest on the portion of a civil penalty not paid within such thirty (30) calendar day period will be assessed at the rate of the U.S. Treasury Tax and Loan Rate in accordance with 40 C.F.R. § 13.11(a).
54. The costs of the Agency’s administrative handling of overdue debts will be charged and assessed monthly throughout the period the debt is overdue. 40 C.F.R. § 13.11(b). Pursuant to Appendix 2 of EPA’s 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 a payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid.
55. A penalty charge of six percent per year will be assessed monthly on any portion of a payment that remains delinquent more than ninety (90) calendar days from the date it was due. 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. 31 C.F.R. § 901.9(d).

56. In order to avoid the assessment of administrative costs for overdue debts, as described above, Respondent must pay the civil penalty in accordance with the payment deadline set forth above.
57. Respondent shall submit a copy of the check (or, in the case of an EFT transfer, a copy of the EFT confirmation) to the following persons:

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

Jefferie E. Garcia (3RC42)
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

58. Failure by Respondent to pay the penalty assessed by the Final Order in full may subject Respondent to a civil action to collect the assessed penalty, plus interest, attorney's fees, costs and an additional quarterly nonpayment penalty pursuant to Section 311(b)(6)(H) of the CWA, 33 U.S.C. § 1321(b)(6)(H). In any such collection action, the validity, amount and appropriateness of the penalty agreed to herein shall not be subject to review.

General Provisions

59. The undersigned officer of Respondent represents and warrants that he or she has the authority to bind the Respondent and its successors or assigns to the terms of this Consent Agreement.
60. The provisions of this Consent Agreement and the Final Order shall be binding upon Respondent and Respondent's successors or assigns.
61. This Consent Agreement and the accompanying Final Order resolve only the civil penalty claims for the specific violations alleged in this Consent Agreement. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. Nor shall anything in this Consent Agreement and Final Order 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 CWA, 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.
62. The effective date of this Consent Agreement and the accompanying Final Order (which is signed by the Regional Administrator of EPA Region III, or his

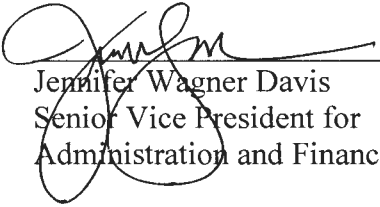
designee, the Regional Judicial Officer) shall be the date the CAFO is filed with the Regional Hearing Clerk pursuant to the Consolidated Rules of Practice, and shall terminate upon Respondent's full compliance with its terms.

63. This Consent Agreement does not create any right in or grant any cause of action to any third party.

For the Respondent, George Mason University

Date: June 12, 2016

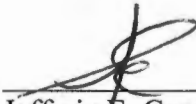
By:



Jennifer Wagner Davis
Senior Vice President for
Administration and Finance

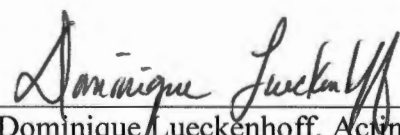
For the Complainant, U.S. Environmental Protection Agency, Region III

Date: 7/14/16

By: 
Jefferie E. Garcia
Senior Assistant Regional Counsel

After reviewing the foregoing Consent Agreement and other pertinent information, the Hazardous Site Cleanup Division, EPA Region III, recommends that the Regional Administrator or the Regional Judicial Officer issue the Final Order attached hereto.

Date: 7/20/16

By: 
Dominique Lueckenhoff, Acting Director
Hazardous Site Cleanup Division
EPA Region III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

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U.S.C. § 1321(b)(3), 1321(j) and 1321(b)(6)(B)(i)**


CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the date provided below, I hand-delivered and filed the original of the signed Consent Agreement and Final Order with the Regional Hearing Clerk, U.S. EPA, Region III, 1650 Arch Street, Philadelphia, Pennsylvania 19103-2029, and that true and correct copies of the Consent Agreement and Final Order were sent by first class mail to:

K. Anne Gentry, Esquire
George Mason University
4400 University Drive
Fairfax, VA 22030

I further certify that I have sent a copy of the CAFO by electronic pdf to Respondent's representative K. Gentry, Esquire on this day.

7/21/16
DATE



Jefferie E. Garcia (3RC42)
Assistant Regional Counsel
Counsel for Complainant
(215) 814-2697