



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

FEB - 8 2018

VIA EMAIL

Ms. Deborah Jean Nelson  
Senior Associate General Counsel  
Anthony Hall 318 - Mail Code 4307  
Southern Illinois University Carbondale  
1265 Lincoln Drive  
Carbondale, Illinois 62901  
dnelson@siu.edu

Re: Southern Illinois University  
EPA ID: ILD 071 965 214  
Consent Agreement and Final Order  
Docket RCRA-05-2018-0005

Dear Ms. Nelson:

Enclosed please find a copy of a fully executed Consent Agreement and Final Order (CAFO) in resolution of the above-referenced case. We filed the original with the Regional Hearing Clerk on February 8, 2018.

Please pay the civil penalty of \$10,000.00 in accordance with paragraph 75 of this CAFO, and reference your check with the Docket RCRA-05-2018-0005. Your payment is due within 30 calendar days of the effective date of the CAFO. Thank you for your cooperation in resolving this matter.

If you have any questions regarding this matter, please contact Graciela Scambiatterra, of my staff, at (312) 353-5103 or [scambiatterra.graciela@epa.gov](mailto:scambiatterra.graciela@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Gary J. Victorine".

Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Todd Marvel, (w/CAFO), Illinois Environmental Protection Agency  
([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov))

Carlo Montemagno, (w/CAFO), Southern Illinois University  
([cmontemagno@siu.edu](mailto:cmontemagno@siu.edu))



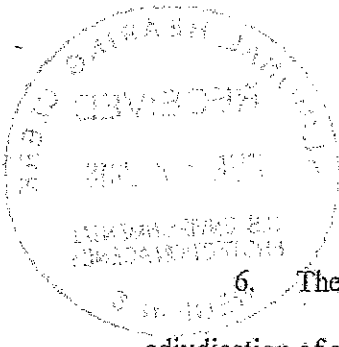
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

In the Matter of:	)	Docket No. RCRA-05-2018-0005
	)	
Southern Illinois University	)	Proceeding to Commence and Conclude
Carbondale, Illinois	)	Under Section 3008(a) of the Resource
	)	Conservation and Recovery Act,
Respondent.	)	42 U.S.C. § 6928(a)
_____		)

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 3008(a) of the Solid Waste Disposal Act, as amended, also known as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), and under 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) as codified at 40 C.F.R. Part 22.
2. The Complainant is the Director of the Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.
3. EPA provided notice of commencement of this action to the State of Illinois pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).
4. Respondent is Southern Illinois University (SIUC), a public research university located in Carbondale in the State of Illinois.
5. 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).



6. 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.

7. 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

8. Jurisdiction for this action is conferred upon EPA by Sections 3006 and 3008 of RCRA, 42 U.S.C. §§ 6926 and 6928.

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

10. 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.

11. Respondent certifies that it is complying fully with RCRA, 42 U.S.C. §§ 6901 – 6939e, the regulations at 40 C.F.R. §§ 260.1 – 279.82 and the federally-authorized Illinois corollaries to the federal regulations.

#### Statutory and Regulatory Background

12. EPA has promulgated regulations, codified at 40 C.F.R. Parts 260 through 279, governing generators and transporters of hazardous waste and facilities that treat, store, and dispose of hazardous waste, pursuant to Sections 3002, 3003, and 3004 of RCRA, 42 U.S.C. §§ 6922, 6923, 6924.

13. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of EPA may authorize a state to administer the RCRA hazardous waste program in lieu of the federal program when the Administrator finds that the state program meets certain conditions. Any violation of regulations promulgated pursuant to Subtitle C (Sections 3001-3023 of RCRA, 42

U.S.C. §§ 6921-6939e) or any state provision authorized pursuant to Section 3006 of RCRA constitutes a violation of RCRA, subject to the assessment of civil penalties and issuance of compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

14. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Administrator of EPA granted the State of Illinois final authorization to administer a state hazardous waste program in lieu of the federal government's base RCRA program effective January 31, 1986. 51 Fed. Reg. 3778 (January 31, 1986).

15. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified period of time, or both. The Administrator of EPA may assess a civil penalty of up to \$25,000 per day for each violation of Subtitle C of RCRA according to Section 3008 of RCRA, 42 U.S.C. § 6928. The Federal Civil Penalties Inflation Adjustment Act of 1990, as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note (1996), required EPA to adjust its penalties for inflation on a periodic basis. Pursuant to the Civil Monetary Penalty Inflation Adjustment Rule, published at 40 C.F.R. Part 19, EPA may assess a civil penalty of up to \$32,500 per day for each violation of Subtitle C of RCRA that occurred after March 15, 2004, through January 12, 2009, and may assess a civil penalty of up to \$37,500 per day for each violation of Subtitle C of RCRA that occurred after January 12, 2009, and before August 1, 2016.

#### **Factual Allegations and Alleged Violations**

16. Respondent is a "person" as defined by 35 Ill. Adm. Code § 720.110 and Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

17. Respondent is an "owner" or "operator," as those terms are defined under 35 Ill. Adm. Code § 720.110 and 40 C.F.R. § 260.10, of a facility located at 1265 Lincoln Drive, MC 4304, Carbondale, IL 62901.

18. At all times relevant to this CAFO, Respondent's Facility consisted of land and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste.

19. Respondent's Facility is a "facility," as that term is defined under and 35 Ill. Adm. Code § 720.110 and 40 C.F.R. § 260.10.

20. At all times relevant to this CAFO, Respondent's Facility had approximately 700 onsite laboratories.

21. At all times relevant to this CAFO, Respondent's acts or processes produced laboratory (lab) waste.

22. At all times relevant to this CAFO, Respondent's acts or processes produced lamp waste.

23. At all times relevant to this CAFO, Respondent's lab waste was a "solid waste" as that term is defined under Ill. Adm. Code § 721.102 and 40 C.F.R. § 261.2.

24. At all times relevant to this CAFO, Respondent's lamp waste was a "solid waste" as that term is defined under Ill. Adm. Code § 721.102 and 40 C.F.R. § 261.2.

25. At all times relevant to this CAFO, Respondent's lab waste was a "hazardous waste" as that term is defined under Ill. Adm. Code § 721.013 and 40 C.F.R. § 261.3.

26. At all times relevant to this CAFO, Respondent's lamp waste was a "hazardous waste" as that term is defined under Ill. Adm. Code § 721.103 and 40 C.F.R. § 261.3.

27. At all times relevant to this CAFO, Respondent's holding of lab waste and lamp waste in containers constituted "storage" of hazardous waste as that term is defined under Ill. Adm. Code § 720.110 and 40 C.F.R. § 260.10.

28. Respondent is a "generator," as that term is defined under 35 Ill. Adm. Code § 720.110 and 40 C.F.R. § 260.10.

29. Respondent generated and managed hazardous waste at its Facility after November 19, 1980.

30. On August 8, 2012, through August 10, 2012, the Illinois Environmental Protection Agency (Illinois EPA) conducted an initial Compliance Evaluation Inspection of the Facility (August 2012 CEI).

31. At all times relevant to this CAFO, the State of Illinois had not issued a permit to Respondent to treat, store, or dispose of hazardous waste at its Facility.

32. At all times relevant to this CAFO, Respondent did not have interim status for the treatment, storage, or disposal of hazardous waste at its Facility.

33. On October 21, 2015, EPA issued a Notice of Violation (NOV) to Respondent alleging certain violations of RCRA discovered during the August 2012 CEI.

34. On December 1, 2015, April 11, 2016 and April 12, 2016, Respondent submitted to EPA written responses to the NOV summary.

35. On April 21, 2017, U.S. EPA issued a Pre-Filing Notice and Opportunity to Confer (PFN) to Respondent alleging certain violations of RCRA discovered during the August 2012 CEI and follow up correspondence.

36. At all times relevant to this CAFO, Respondent generated during each calendar month more than 1000 kg of hazardous waste at the Facility.

37. On August 25, 2017, Respondent submitted to EPA a written response to the PFN summary.

38. Respondent's initial Hazardous Waste Notification was submitted on or near November 15, 1980.

39. In its Hazardous Waste Notifications referenced in paragraph 38 above, Respondent identified itself as a generator of hazardous waste.

**Count 1: Storage of Hazardous Waste Without a Permit or Interim Status**

40. Complainant incorporates paragraphs 1 through 39 of this CAFO as though set forth in this paragraph.

41. Pursuant to 3005(a) of RCRA, 42 U.S.C. § 6925(a), and the regulations at 40 C.F.R. Part 270, the treatment, storage, or disposal of hazardous waste by any person who has not applied for or received a permit is prohibited.

42. Pursuant to 35 Ill. Adm. Code § 722.134(a) and 40 C.F.R. § 262.34(a), a generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without having a permit or interim status provided that the generator complies with all applicable conditions set forth in 35 Ill. Adm. Code § 722.134(a)(c), and 40 C.F.R. § 262.34(a)(c), including, but not limited to, requirements for owners and operators in Subparts C, D, and I of 35 Ill. Adm. Code Part 725 and 35 Ill. Adm. Code 725.116.

**A): Failure to Maintain Training Records**

43. In order for a generator of hazardous waste to maintain its exemption from the requirement to have an operating permit or interim status, it must implement a hazardous waste management procedures training program and maintain and keep all documents required for

personnel training. 35 Ill. Adm. Code §§ 722.134(a)(4), 725.116(d)(1) and 40 CFR §§ 262.34(a)(4), 265.16(d)(1).

44. At the time of the August 2012 CEI, Respondent failed to maintain any documents and records providing the type and amount of both introductory and continuing training to be given to one employee at the Facility.

45. Accordingly, Respondent failed to satisfy one of the conditions for maintaining its exemption from the requirement to have an operating permit or interim status when it failed to maintain records that provided the type and amount of both introductory and continuing training to be given to one employee filling a hazardous waste management position, as referenced in paragraph 44.

**B): Failure to Date Hazardous Waste Containers**

46. In order for a generator of hazardous waste to maintain its exemption from the requirement to have an operating permit or interim status, it must clearly mark each container holding hazardous waste with the date upon which the period of accumulation began." 35 Ill. Adm. Code § 722.134(a) (2) and 40 C.F.R. § 262.34(a)(2).

47. At the time of the August 2012 CEI, Respondent had not marked one drum of crushed hazardous waste lamps generated by the physical plant with the date upon which the period of accumulation began.

48. Accordingly, Respondent failed to satisfy one of the conditions for maintaining its exemption from the requirement to have an operating permit or interim status when it failed to mark one drum of crushed hazardous waste lamps generated by the physical plant with the accumulation start date as referenced in paragraph 47 above.



**C): Failure to Label Hazardous Waste Containers**

49. In order for a generator of hazardous waste to maintain its exemption from the requirement to have an operating permit or interim status, it must label or mark each container holding hazardous waste clearly with the words "Hazardous Waste." 35 Ill. Adm. Code § 722.134(a) (3) and 40 C.F.R. § 262.34(a)(3).

50. At the time of the August 2012 CBI, Respondent had not labeled or marked one drum of crushed hazardous waste lamps generated by the physical plant with the words "Hazardous Waste."

51. Accordingly, Respondent failed to satisfy one of the conditions for maintaining its exemption from the requirement that it have an operating permit or interim status when it failed to label one drum of crushed hazardous waste lamps generated by the physical plant as referenced in paragraph 50 above.

**D): Failure to Label Hazardous Waste Container in Satellite Accumulation Area**

52. In order for a generator of hazardous waste to maintain its exemption from the requirement to have an operating permit or interim status, it must label or mark each container holding hazardous waste at or near the point of generation with the words "Hazardous Waste" or with other words that identify the contents of the container. 35 Ill. Adm. Code § 722.134(c)(1)(ii) and 40 C.F.R. § 262.34(c)(1) (ii).

53. At the time of the August 2012 CBI, Respondent had not labeled or marked several containers of hazardous waste in Pulliam Hall, the Engineering building, the Agriculture building, and the Neckers building with the words, "Hazardous Waste" or with other words that identify the content of the container.

54. Accordingly, Respondent failed to satisfy one of the conditions for maintaining its exemption from the requirement that it have an operating permit or interim status when it failed to label several containers of hazardous waste, as referenced in paragraph 53 above.

**E): Failure to Maintain Container Requirements**

55. In order for a generator of hazardous waste to maintain its exemption from the requirement to have an operating permit or interim status, a generator using containers to accumulate hazardous waste must transfer the waste to a container that is in good condition if the current container is not in good condition or begins to leak, must use containers that will not react with and are otherwise compatible with the hazardous waste to be stored, must always keep containers closed during storage, except when it is necessary to add or remove waste, must inspect areas where containers are stored at least weekly, looking for leaking containers and for deterioration of containers caused by corrosion or other factors, and must store incompatible waste separately. 35 Ill. Adm. Code §§ 725.271, 725.272, 725.273, 725.274, 725.277, 722.134(a), 722.134(c), and 40 CFR §§ 265.171, 265.172, 265.173, 264.174, 265.177, 262.34(a) and 262.34(c).

56. At the time of the August 2012 CBI, Respondent was storing one container that was leaking and other containers that had discolored lids. Respondent was storing one container bottle that had a broken lid with waste on the outside, four metal containers that were corroded, one small metal container that had leaked waste onto the floor of a cabinet, and two other bottles that were leaking. Waste methanol was allowed to evaporate from an improperly closed container. Respondent was not inspecting on a weekly basis the area where hazardous waste crushed lamps generated by the physical plant were being stored.

57. Accordingly, Respondent failed to satisfy one of the conditions for maintaining its exemption from the requirement that it have an operating permit or interim status when it failed to transfer waste from leaking containers to containers in good condition, failed to use containers that will not react with and are otherwise incompatible with the hazardous waste that they were storing, failed to keep containers closed during storage when not adding or removing waste, and failed to inspect areas where containers are stored at least weekly, as referenced in paragraph 56 above.

**F): Failure to Maintain a Contingency Plan**

58. In order for a generator of hazardous waste to maintain its exemption from the requirement to have an operating permit or interim status, it must maintain a contingency plan that includes a list of all emergency equipment at the facility and a description of its capabilities. 35 Ill. Adm. Code §§ 722.134(a), 725.152 and 40 CFR §§ 262.34(a), 265.52.

59. At the time of the August 2012 CEI, Respondent failed to have information regarding spill control equipment for Rooms 302 and 304 of the Neckers building. In addition, Respondent failed to have emergency plan information for Room 144 of the Neckers building.

60. Accordingly, Respondent failed to satisfy one of the conditions for maintaining its exemption from the requirement that it have an operating permit or interim status when it failed to have information regarding spill control equipment and emergency plan information for the Neckers building, as referenced in paragraph 59 above.

**G): Failure to Equip the Facility with Emergency Equipment**

61. In order for a generator of hazardous waste to maintain its exemption from the requirement to have an operating permit or interim status, it must be equipped with emergency

equipment and have access to emergency communication. 35 Ill. Adm. Code §§ 722.134(a), 725.132 and 725.134 and 40 CFR §§ 262.34(a), 265.32 and 265.34.

62. At the time of the August 2012 CEI, Respondent failed to have telephones available in Rooms 106, 108 or 109 of the Agriculture building, failed to have telephones available in Rooms 302 and 304 of the Neckers building, failed to have a telephone available in Room 144 of the Neckers building, and failed to have telephones available in Rooms 104 and 105 of Pulliam Hall for emergency communications.

63. Accordingly, Respondent failed to satisfy one of the conditions for maintaining its exemption from the requirement that it have an operating permit or interim status when it failed to have telephones in the Neckers building and Pulliam Hall for emergency equipment, as referenced in paragraph 62 above.

64. Respondent's storage of hazardous waste without a permit or interim status violated Section 3005 of RCRA, 42 U.S.C. § 6925(a) and the requirements of 35 Ill. Adm. Code § 703.121, 35 Ill. Adm. Code § 702.120, and 35 Ill. Adm. Code § 702.123 and 40 C.F.R. §§ 270.1(c) and 270.10(a) and (d), and 270.13.

**Count 2: Failure to Submit Annual Reports with Required Information**

65. Complainant incorporates paragraphs 1 through 39 of this CAFO as though set forth in this paragraph.

66. 35 Ill. Adm. Code § 722.141 and 40 C.F.R. § 262.41 requires that a generator who generates over 1,000 kilograms (2,200 pounds) of hazardous waste in a calendar month must prepare and submit an annual report to the Illinois EPA by March 1 that lists all of the hazardous waste generated during the preceding calendar year.

67. On December 20, 2012, Respondent shipped offsite eleven drums (4200 pounds) of crushed mercury lamp hazardous waste (D009 waste code) on manifest #010657305JJK.

68. Respondent failed to include the eleven drums (4200 pounds) of hazardous waste on the annual report to the Illinois EPA for its calendar year 2012 generator activities, submitted to the Illinois EPA on February 13, 2013.

69. When Respondent failed to include all the generator activities in its 2012 annual report, it violated 35 Ill. Adm. Code § 722.141 [40 C.F.R. § 262.41].

### **Count 3: Failure to Make Hazardous Waste Determinations**

70. Complainant incorporates paragraphs 1 through 39 of this CAFO as though set forth in this paragraph.

71. 35 Ill. Adm. Code § 722.111 and 40 C.F.R. § 262.11 requires that a generator must determine if its waste is hazardous.

72. At the time of the August 2012 CEI, Respondent had not made hazardous waste determinations on sand blast grit from the Glass Department in Room 109 of Pulliam Hall, precipitate from a quadruple sink basin, dust collector waste, sand blast grit, and waste in a catch basin under a sink at an ultrasonic cleaning station from the Small Metals laboratory in Rooms 104 and 105 of Pulliam Hall.

73. For each time Respondent failed to make a hazardous waste determination in paragraph 72 above, Respondent violated 35 Ill. Adm. Code § 722.111 and 40 C.F.R. § 262.11.

### **Civil Penalty**

74. Pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), Complainant determined that an appropriate civil penalty to settle this action is \$10,000. In determining the penalty amount, Complainant considered the facts and circumstances of this case with specific

reference to EPA's 2003 RCRA Civil Penalty Policy, Respondent's cooperation and other factors as justice may require, including an Ability to Pay analysis.

75. Within 30 days after the effective date of this CAFO, Respondent must pay a \$10,000 civil penalty for the RCRA violations:

By 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  
SWIFT address FRNYUS33  
33 Liberty Street  
New York, NY 10045  
Field Tag 4200 of the Fedwire message is  
"D68010727 Environmental Protection Agency"

In the comment or description field of the electronic funds transfer, state the case title: "Southern Illinois University," the docket number of this CAFO, and the billing document number.

For ACH, also known as REX or remittance express, payable to "Treasurer, United States of America," and sent to:

US Treasury REX / Cashlink ACH Receiver  
ABA: 051036706  
Account Number: 310006, Environmental Protection Agency  
CTX Format Transaction Code 22 – checking

For on-line payment, go to:

[WWW.PAY.GOV](http://WWW.PAY.GOV)

Use the Search Public Forms option and enter 'sfo 1.1' in the search field. Open form and complete required fields.

76. A transmittal letter stating Respondent's name, the case title: "Southern Illinois University," and the case docket number must accompany the payment. Respondent must send a copy of the check and transmittal letter to:

Regional Hearing Clerk (E-19J)  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604

Graciela Scambiaterra (LR-17J)  
RCRA Branch  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604

Puja Lakhani (C-14J)  
Office of Regional Counsel  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604

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

78. If Respondent does not timely pay the civil penalty, EPA may bring an action 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 validity, amount, and appropriateness of the civil penalty are not reviewable in a collection action.

79. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date payment was due at a rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

### General Provisions

80. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in the CAFO.

81. This CAFO does not affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

82. This CAFO does not affect Respondent's responsibility to comply with RCRA and other applicable federal, state, local laws or permits.

83. This CAFO is a "final order" for purposes of 40 C.F.R. § 22.31, EPA's RCRA Civil Penalty Policy, and EPA's Hazardous Waste Civil Enforcement Response Policy (December 2003).

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

85. Each person signing this 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.

86. Each party agrees to bear its own costs and attorney's fees in this action.

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



In the Matter of:  
Southern Illinois University Carbondale  
Docket No. RCRA-05-2018-0005

Southern Illinois University, Respondent

19 Jan 18  
Date

Carlo Montemagno  
Carlo Montemagno  
Chancellor  
Southern Illinois University

United States Environmental Protection Agency, Complainant

LE ... ORM  
[Signature]

01/30/2018  
Date

Michael D. Harris <sup>for M.G.</sup>  
Margaret M. Guerriero  
Division Director  
Land and Chemicals Division.

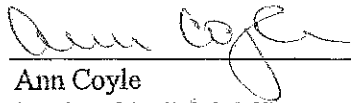
In the Matter of:  
Southern Illinois University Carbondale  
Docket No. RCRA-05-2018-0005

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.

Feb 7, 2018

Date



Ann Coyle  
Regional Judicial Officer  
United States Environmental Protection Agency  
Region 5

Consent Agreement and Final Order  
In the matter of: Southern Illinois University  
Docket Number: **RCRA-05-2018-0005**

**CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, docket number RCRA-05-2018-0005, which was filed on February 8, 2018, in the following manner to the following addressees:

Copy by E-Mail to Respondent: Mr. Carlo Montemagno  
Chancellor, Southern Illinois University  
[cmontemagno@siu.edu](mailto:cmontemagno@siu.edu)

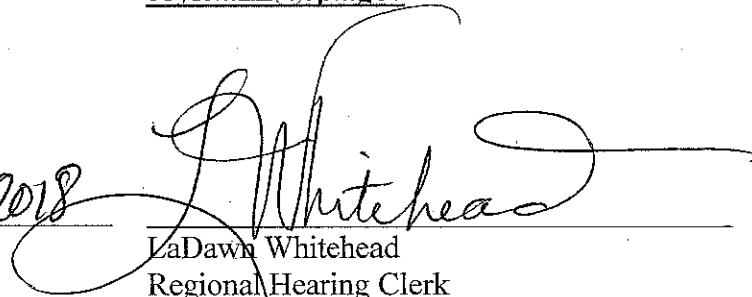
Copy by E-mail to Attorney for Respondent: Deborah Jean Nelson, Southern Illinois University  
[dnelson@siu.edu](mailto:dnelson@siu.edu)

Copy by E-mail to Attorney for Complainant: Puja Lakhani  
[lakhani.puja@epa.gov](mailto:lakhani.puja@epa.gov)

Copy by E-mail to EPA enforcement staff contact: Graciela Scambiaterra  
[scambiaterra.graciela@epa.gov](mailto:scambiaterra.graciela@epa.gov)

Copy by E-mail to Regional Judicial Officer: Ann Coyle  
[coyle.ann@epa.gov](mailto:coyle.ann@epa.gov)

Dated: February 8, 2018

  
\_\_\_\_\_  
LaDawn Whitehead  
Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 5.