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HEARINGS CLERK
EPA--REGION 10

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

| | | |
|-------------------------------------|---|-----------------------------|
| In the Matter of: |) | |
| |) | DOCKET NO. CWA-10-2015-0039 |
| Supervalu Holdings, Inc., |) | |
| |) | CONSENT AGREEMENT AND |
| Supervalu Frozen Foods, |) | FINAL ORDER |
| Auburn, Washington |) | |
| |) | |
| Supervalu Main Distribution Center, |) | |
| Tacoma, Washington |) | |
| |) | |
| Supervalu International Warehouse, |) | |
| Tacoma, Washington |) | |
| |) | |
| Respondent. |) | |

I. STATUTORY AUTHORITY

1.1. This Consent Agreement and Final Order (“CAFO”) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (“EPA”) by Section 309(g)(2)(B) of the Clean Water Act (“CWA”), 33 U.S.C. § 1319(g)(2)(B).

1.2. The Administrator has delegated the authority to issue the Final Order contained in Part V of this CAFO to the Regional Administrator of EPA Region 10, who has redelegated this authority to the Regional Judicial Officer in EPA Region 10.

1.3. Pursuant to Section 309(g)(1) and (2)(B) of the CWA, 33 U.S.C. § 1319(g)(1) and (2)(B), and in accordance with the “Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties,” 40 C.F.R. Part 22, EPA issues, and Supervalu Holdings, Inc. (“Respondent”) agrees to issuance of, the Final Order contained in Part V of this CAFO.

II. PRELIMINARY STATEMENT

2.1. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b), issuance of this CAFO commences this proceeding, which will conclude when the Final Order contained in Part V of this CAFO becomes effective.

2.2. The Administrator has delegated the authority to sign consent agreements between EPA and the party against whom a Class II penalty is proposed to be assessed pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), to the Regional Administrator of EPA Region 10, who has redelegated this authority to the Director of the Office of Compliance and Enforcement, EPA Region 10 (“Complainant”).

2.3. Part III of this CAFO contains a concise statement of the factual and legal basis for the alleged violations of the CWA together with the specific provisions of the CWA and the implementing regulations that Respondent is alleged to have violated.

III. ALLEGATIONS

3.1. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the “discharge of a pollutant” by any person into navigable waters of the United States, except, *inter alia*, as authorized by a National Pollutant Discharge Elimination System (“NPDES”) permit issued

pursuant to Section 402 of the Act, 33 U.S.C. § 1342. Section 402(a) of the CWA, 33 U.S.C. § 1342(a), provides that a state with an approved NPDES program may issue permits for the discharge of pollutants into waters of the United States upon such specific terms and conditions as the state may prescribe.

3.2. Section 502(12) of the CWA, 33 U.S.C. § 1362(12), defines “discharge of a pollutant” to include “any addition of any pollutant to navigable waters from any point source.” Section 502(7) of the CWA, 33 U.S.C. § 1362(7), defines “navigable waters” as “waters of the United States.” EPA’s regulations define “waters of the United States” to include waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce; all interstate waters; and tributaries to those waters. 40 C.F.R. § 122.2.

3.3. Section 502(6) of the CWA, 33 U.S.C. § 1362(6), defines “pollutant” to include, *inter alia*, dredged spoil, rock, sand, chemical wastes and industrial waste.

3.4. Section 502(14) of the Clean Water Act, 33 U.S.C. § 1362(14), defines the term “point source” to include any “pipe, ditch, channel, tunnel, or conduit . . . from which pollutants are or may be discharged.”

3.5. Section 402(p) of the Act, 33 U.S.C. § 1342(p), specifies that an NPDES permit is required for any stormwater discharge “associated with industrial activity.” Section 402(p) also authorizes EPA to issue regulations that designate additional stormwater discharge sources and establish a comprehensive program to regulate these additional sources.

3.6. EPA’s regulations define “stormwater discharge associated with industrial activity” to include discharges associated with facilities under Standard Industrial Classification 4221-25. 40 C.F.R. § 122.26(b)(14)(xi).

3.7. The State of Washington has a federally approved NPDES permit program administered by the Washington Department of Ecology (“Ecology”).

3.8. In October 2009, Ecology reissued the Washington Industrial Stormwater General Permit (“2010 Stormwater GP”) pursuant to Section 402 of the CWA, 33 U.S.C. § 1342. The 2010 Stormwater GP became effective on January 1, 2010, and has an expiration date of January 1, 2015. The 2010 Stormwater GP was modified with the new effective date of July 1, 2012. The 2010 Stormwater GP authorizes certain discharges of stormwater associated with industrial activity at permitted facilities.

3.9. The 2010 Stormwater GP requires facilities engaged in certain industrial activities to apply for coverage under the permit if stormwater from the facility discharges to a surface water body, or to a storm sewer system that discharges to a surface water body. Permittees are required to comply with the conditions and requirements set forth in the 2010 Stormwater GP.

3.10. Respondent is a corporation duly organized under the laws of the State of Missouri and is therefore a “person” as defined under Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

Supervalu Frozen Foods Auburn Facility

3.11. At all times relevant to this action, Respondent was the owner and/or operator of a facility located at 701 15th Street SW in Auburn, Washington (“Frozen Foods Facility”).

3.12. The Frozen Foods Facility, which was under Respondent’s control at all times relevant to this action, discharges stormwater offsite to Mill Creek via a drain line at the northwest corner of the Frozen Foods Facility property. The Frozen Foods Facilities’ stormwater discharges contain “pollutants” within the meaning of Section 502(6) and (12) of the CWA, 33 U.S.C. § 1362(6) and (12).

3.13. Mill Creek flows to the Green River which flows to the Duwamish River and eventually enters the Puget Sound. Puget Sound is currently used, was used in the past, or may

be susceptible to use in interstate and foreign commerce, and thus is a “navigable water” as defined in Section 502(7) of the CWA, 33 U.S.C. § 1362(7), and “water of the United States” as defined in 40 C.F.R. § 122.2.

3.14. The Frozen Foods Facility is a point source within the meaning of Section 502(14) of the CWA, 33 U.S.C. § 1362(14), and 40 C.F.R. § 122.2. In the alternative, the Facility contains point sources.

3.15. The Frozen Foods Facility was issued permit number WAR002001, effective January 1, 2010, with a modification that took effect on July 1, 2012.

3.16. EPA inspected the Frozen Foods Facility on June 6, 2013.

3.17. The EPA June 6, 2013 inspection showed that Respondent violated the 2010 Stormwater GP numerous times between July 20, 2011 and June 6, 2013.

Supervalu Frozen Foods Violations

Count 1: Failure of SWPPP to Comply with Permit Requirements

3.18. Condition S3.B.1.d. of the 2010 Stormwater GP requires the SWPPP site map to identify the stormwater drainage areas for each stormwater discharge point off-site and assign a unique identifying number for each discharge point.

3.19. Condition S3.B.2.b. requires the SWPPP identify all areas associated with industrial activities that have been or may potentially be sources of pollutants.

3.20. As of the date of EPA’s inspection of the Frozen Foods Facility on June 6, 2013, Respondent had not identified stormwater drainage areas for each stormwater discharge point off-site and had not assigned a unique identifying number for each discharge point, nor identified all areas associated with industrial activities that have been or may potentially be sources of

pollutants in the February 23, 2011 SWPPP, in violation of Conditions S3.B.1.d. and S3.B.2.b of the 2010 the Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Count 2: Failure to Implement Adequate Control Measures

3.21. Condition S3.B.4.b.i.2.a requires that paved surfaces be vacuumed with a vacuum sweeper to remove accumulated pollutants a minimum of once per quarter.

3.22. Condition S3.B.4.b.i.2.d requires that all dumpsters be kept under cover or fit with a lid that must remain closed when not in use.

3.23. Condition S3.B.4.b.i.4.a, requires that chemical liquids, fluids and petroleum products be stored on an impervious surface that is surrounded with a containment berm or dike.

3.24. Condition S3.B.4.b.i.7 requires elimination of the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters.

3.25. Respondent failed to vacuum paved surfaces during the last quarter of 2011, all four quarters of 2012, and the first quarter of 2013; failed to keep dumpsters properly covered on June 6, 2013; failed to store chemical liquids, fluids and petroleum products on an impervious surface with containment on June 6, 2013; and failed to eliminate discharges to stormwater sewers or to surface waters on or around June 6, 2013 in violation of Conditions S3.B.4.b.i. of the 2010 the Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Count 3: Failure to Conduct or Report Compliance, Visual or Benchmark Monitoring

3.26. Condition S4.B.2.c requires quarterly sampling of each distinct point of discharge off-site.

3.27. Respondent failed to conduct quarterly sampling of each distinct point of discharge off-site during the fourth quarter of 2011, all four quarters of 2012 and the first quarter of 2013, in violation of Condition S4.B.2.c of the 2010 Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Count 4: Failure to Inspect or Document Inspections

3.28. Condition S7.A.1 requires that visual inspections be conducted and documented of the site each month.

3.29. Respondent failed to conduct and document monthly visual inspections of the site in December 2011 and August 2012, as required by Condition S7.A.1 of the 2010 Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Supervalu Tacoma Facilities

3.30. At all times relevant to this action, Respondent was the owner and/or operator of two facilities located in close proximity to one another in Tacoma, Washington: 1) Supervalu Main Distribution Center (“Main Distribution Facility”) located at 1525 East D Street; and 2) Supervalu International Warehouse (“International Warehouse Facility”) located at 1801 East D Street.

3.31. The Main Distribution and International Warehouse Facilities, which were under Respondent’s control at all times relevant to this action, discharge stormwater offsite. The Main Distribution Facility discharges stormwater via Outfall 249 to the Thea Foss Waterway. The International Warehouse Facility discharges stormwater via Outfall 248 to the Thea Foss Waterway. The Main Distribution and International Warehouse Facilities’ stormwater

discharges contain “pollutants” within the meaning of Section 502(6) and (12) of the CWA, 33 U.S.C. § 1362(6) and (12).

3.32. The Thea Foss Waterway is located in Commencement Bay, a water body that does not meet water quality standards for PCBs, copper, zinc and other pollutants and is on the state of Washington’s CWA § 303(d) list of impaired water bodies. Thea Foss Waterway is currently used, was used in the past, or may be susceptible to use in interstate and foreign commerce, and thus is a “navigable water” as defined in Section 502(7) of the CWA, 33 U.S.C. § 1362(7), and “water of the United States” as defined in 40 C.F.R. § 122.2.

3.33. The Main Distribution and International Warehouse Facilities are point sources within the meaning of Section 502(14) of the CWA, 33 U.S.C. § 1362(14), and 40 C.F.R. § 122.2. In the alternative, the Main Distribution and International Warehouse Facilities contain point sources.

3.34. The Main Distribution Facility was issued permit number WAR001693, effective January 1, 2010, with a modification that took effect on July 1, 2012.

3.35. The International Warehouse Facility was issued permit number WAR011773, effective January 1, 2010, with a modification that took effect July 1, 2012.

3.36. EPA inspected the Main Distribution and International Warehouse Facilities on May 8, 2013.

3.37. The EPA May 8, 2013 inspections showed that Respondent violated the 2010 Stormwater GP numerous times between January 2010 and May 2013.

Supervalu Main Distribution Center Violations

Count 1: Failure of SWPPP to Comply with Permit Requirements

3.38. Condition S3.B.2.b of the 2010 Stormwater GP requires identification of all areas associated with industrial activities that have been or may potentially be sources of pollutants.

3.39. Condition S3.B.3 requires the permittee to identify in the SWPPP specific individuals by name or by title within the organization (pollution prevention team) who are responsible for SWPPP development, implementation, maintenance and modification.

3.40. As of the date of EPA's inspection of the Main Distribution Facility on May 8, 2013, Respondent had not identified all areas associated with industrial activities that have been or may potentially be sources of pollutants, nor identified in the SWPPP specific individuals by name or by title within the organization who are responsible for SWPPP development, implementation, maintenance and modification at the Main Distribution Facility in the July 25, 2011 SWPPP, in violation of Conditions S3.B.2.b and S3.B.3 of the 2010 the Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Count 2: Failure to Implement Adequate Control Measures

3.41. Condition S3.B.4.b.i.2 requires inclusion of best management practices ("BMPs") that define ongoing maintenance and cleanup of areas which may contribute pollutants to stormwater discharges.

3.42. Condition S3.B.4.b.i.2.d requires that all dumpsters be kept under cover or fit with a lid that must remain closed when not in use.

3.43. Condition S3.B.4.b.i.4.c requires adequate spill kits be located within 25 feet of all stationary fueling stations, fuel transfer stations and mobile fueling units. Condition

S3.B.4.b.i.5 requires provision of annual SWPPP training for employees who have duties in areas of industrial activities subject to the Stormwater GP.

3.44. Respondent failed to include appropriate BMPs that define ongoing maintenance and cleanup of areas which may contribute pollutants to stormwater discharges on May 8, 2013; failed to keep all dumpsters properly covered or fit with a lid that must remain closed when not in use on May 8, 2013; failed to provide adequate spill kits on May 8, 2013; and failed to provide SWPPP training for employees who have duties in areas of industrial activities subject to the Stormwater GP in 2011 and 2012 in violation Conditions S3.B.4.b.i. of the 2010 the Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Count 3: Failure to Conduct or Report Compliance, Visual or Benchmark Monitoring

3.45. Condition S4.B.1.a requires the sampling of discharge from each designated location at least once per quarter.

3.46. Condition S9.B.1 requires submission of a complete and accurate annual report.

3.47. Respondent failed to sample the discharge from each designated location during the first quarter of 2010, and failed to submit complete and accurate annual reports for 2011 and 2012, in violation of Condition S4.B.1.a and S9.B.1 of the 2010 Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Count 4: Failure to Inspect or Document Inspections

3.48. Condition S7.A.1 requires that visual inspections be conducted and documented each month.

3.49. Condition S7.C.1 requires completion of a monthly inspection report.

3.50. Respondent failed to conduct and document monthly visual inspections each month between January 2010 through February 2011 and failed to complete a monthly inspection report for each month between March 2011 through August 2012 as required by Conditions S7.A.1, S7.C.1 and S9.C.1 of the 2010 Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Supervalu International Warehouse Violations

Count 5: Failure of SWPPP to Comply with Permit Requirements

3.51. Condition S3.B.3 requires the permittee to identify in the SWPPP specific individuals by name or by title within the organization (pollution prevention team) who are responsible for SWPPP development, implementation, maintenance and modification.

3.52. Condition S3.B.5.b requires documentation of why each discharge point is not sampled.

3.53. As of the date of EPA's inspection of the International Warehouse Facility on May 8, 2013, Respondent had not identified in the SWPPP specific individuals by name or by title within the organization who are responsible for SWPPP development, implementation, maintenance and modification nor provided documentation of why each discharge point is not sampled in the July 25, 2011 SWPPP in violation of Conditions S3.B.3 and S3.B.5.b of the 2010 the Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Count 6: Failure to Conduct or Report Compliance, Visual or Benchmark Monitoring

3.54. Condition S4.B.1.a requires sampling the discharge from each designated location at least once per quarter.

3.55. Condition S9.B.1 requires submission of a complete and accurate annual report.

3.56. Respondent failed to sample the discharge from each designated location during the first and last quarter of 2010, and failed to submit complete and accurate annual reports during 2010, 2011 and 2012, in violation of Conditions S4.B.1.a and S9.B.1 of the 2010 Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Count 8: Failure to Inspect or Document Inspections

3.57. Condition S7.A.1 requires that visual inspections be conducted and documented at the site each month.

3.58. Condition S7.C.1 requires completion of a monthly inspection report.

3.59. Condition S7.C.1.f requires a duly authorized representative to certify and sign inspection reports.

3.60. Respondent failed to conduct and document at the site monthly visual inspections each month between January 2010 through February 2011, failed to complete monthly inspection reports each month between March 2011 through August 2012, and failed to have a duly authorized representative sign and certify inspection reports each month between December 2012 through March 2013 as required by Conditions S7.A.1, S7.C.1, and S7.C.1.f of the 2010 Stormwater GP and Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

3.61. Under Section 309(g)(1) of the CWA, 33 U.S.C. § 1319(g)(1), EPA may assess an administrative penalty when EPA finds that “any person has violated any permit condition or limitation ... in a permit issued” pursuant to Section 402 of the CWA, 33 U.S.C. § 1342. Consequently, under Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), and 40 C.F.R. Part 19, Respondent is liable for the administrative assessment of civil penalties for violations at the Supervalu Frozen Foods, Main Distribution and International Warehouse

Facilities in an amount not to exceed \$16,000 per day for each day during which the violation continues, up to a maximum of \$187,500.

IV. CONSENT AGREEMENT

4.1. Respondent admits the jurisdictional allegations of this CAFO.

4.2. Respondent neither admits nor denies the specific factual allegations contained in this CAFO.

4.3. As required by Section 309(g)(3) of the CWA, 33 U.S.C. § 1319(g)(3), EPA has taken into account the nature, circumstances, extent, and gravity of the alleged violations as well as Respondent's economic benefit of noncompliance, ability to pay, and other relevant factors. After considering all of these factors, EPA has determined and Respondent agrees that an appropriate penalty to settle this action is \$120,000.

4.4. Respondent agrees to pay the total civil penalty set forth in Paragraph 4.3 within 30 days of the effective date of the Final Order contained in Part V of this CAFO.

4.5. Payment under this CAFO must be made by a cashier's check or certified check payable to the order of "Treasurer, United States of America" and delivered to the following address:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

Respondent must note on the check the title and docket number of this action.

4.6. Respondent must serve photocopies of the check described in Paragraph 4.5 on the Regional Hearing Clerk and EPA Region 10 at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 10, Mail Stop ORC-158
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Eva DeMaria
U.S. Environmental Protection Agency
Region 10, Mail Stop OCE-133
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

4.7. If Respondent fails to pay the penalty assessed by this CAFO in full by its due date, the entire unpaid balance of penalty and accrued interest shall become immediately due and owing. Such failure may also subject Respondent to a civil action to collect the assessed penalty under the CWA, together with interest, fees, costs, and additional penalties described below. In any collection action, the validity, amount, and appropriateness of the penalty shall not be subject to review.

4.7.1. Interest. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C.

§ 1319(g)(9), any unpaid portion of the assessed penalty shall bear interest at a rate established by the Secretary of Treasury pursuant to 31 U.S.C. § 3717(a)(1) from the effective date of the Final Order set forth in Part V, provided however, that no interest shall be payable on any portion of the assessed penalty that is paid within 30 days of the effective date of the Final Order.

4.7.2. Attorneys Fees, Collection Costs, Nonpayment Penalty. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), if Respondent fails to pay on a timely basis the penalty set forth in Paragraph 4.3, Respondent shall pay (in addition to any assessed penalty and interest) attorneys fees and costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to 20% of the aggregate amount of

Respondent's penalties and nonpayment penalties which are unpaid as of the beginning of such quarter.

4.8. The penalty described in Paragraph 4.3, including any additional costs incurred under Paragraph 4.7, above, represents an administrative civil penalty assessed by EPA and shall not be deductible for purposes of federal taxes.

4.9. The undersigned representative of Respondent certifies that he or she is authorized to enter into the terms and conditions of this CAFO and to bind Respondent to this document.

4.10. The undersigned representative of Respondent also certifies that, as of the date of Respondent's signature of this CAFO, Respondent has corrected the violation(s) alleged in Part III above.

4.11. Except as described in Subparagraph 4.7.2, above, each party shall bear its own costs in bringing or defending this action.

4.12. Respondent expressly waives any right to contest the allegations and waives any right to appeal the Final Order set forth in Part V.

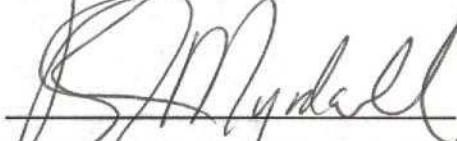
4.13. The provisions of this CAFO shall bind Respondent and its agents, servants, employees, successors, and assigns.

4.14. The above provisions are STIPULATED AND AGREED upon by Respondent and EPA Region 10.

DATED:

12/15/14


FOR RESPONDENT:


SUPERVALU HOLDINGS, INC. ^{PO}

DATED:

1/26/2015

FOR COMPLAINANT:


EDWARD J. KOWALSKI, Director
Office of Compliance and Enforcement
EPA Region 10

V. FINAL ORDER

5.1. The terms of the foregoing Parts I-IV are ratified and incorporated by reference into this Final Order. Respondent is ordered to comply with the terms of settlement.

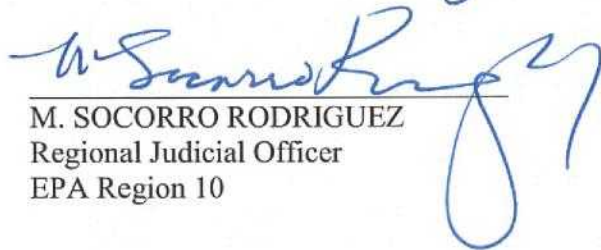
5.2. This CAFO constitutes a settlement by EPA of all claims for civil penalties pursuant to the CWA for the violations alleged in Part III. In accordance with 40 C.F.R. § 22.31(a), nothing in this CAFO shall affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law. This CAFO does not waive, extinguish, or otherwise affect Respondent's obligations to comply with all applicable provisions of the CWA and regulations promulgated or permits issued thereunder.

5.3. In accordance with Section 309(g)(1) of the CWA, 33 U.S.C. § 1319(g)(1), and 40 C.F.R. § 22.38(b), the Washington Department of Ecology has been given the opportunity to consult with EPA regarding the assessment of the administrative civil penalty against Respondent.

5.4. Pursuant to Section 309(g)(4)(A) of the CWA, 33 U.S.C. § 1319(g)(4)(A), and 40 C.F.R. § 22.45(b), EPA has issued public notice of and provided reasonable opportunity to comment on its intent to assess an administrative penalty against Respondent. More than 40 days have elapsed since issuance of this public notice and EPA has received no petition to set aside the Consent Agreement contained herein.

5.5. This Final Order shall become effective upon filing.

SO ORDERED this 27th day of January, 2015.


M. SOCORRO RODRIGUEZ
Regional Judicial Officer
EPA Region 10

Certificate of Service

The undersigned certifies that the original of the attached **CONSENT AGREEMENT AND FINAL ORDER, In the Matter of: Supervalu Holdings, Docket No.: CWA-10-2015-0039**, was filed with the Regional Hearing Clerk and served on the addressees in the following manner on the date specified below:


The undersigned certifies that a true and correct copy of the document was delivered to:

Stephanie L. Mairs
Office of Regional Counsel
U.S. Environmental Protection Agency
1200 Sixth Avenue, ORC-158, Suite 900
Seattle, WA 98101

Further, the undersigned certifies that a true and correct copy of the aforementioned document was placed in the United States mail certified/return receipt to:

Tom Darling, Esq.
Senior Litigation Attorney
Supervalu
East View Innovation Center Office
7075 Flying Cloud Drive
Eden Prairie, MN 55344

DATED this 28th day of January, 2015


Signature

Candace H. Smith
Regional Hearing Clerk
EPA Region 10

