



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 31 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Ronald Coupar  
Environmental Manager  
Behr Iron and Metal  
1100 Seminary Street  
Rockford, Illinois 61104

Dear Mr. Coupar:

Enclosed is a file-stamped Consent Agreement and Final Order (CAFO) which resolves case docket no. CAA-05-2015-0014. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on DEC 31 2014.

Pursuant to paragraph 31 of the CAFO, Behr Iron and Metal must pay the civil penalty within 30 days of DEC 31 2014. Your check must display the docket number CAA-05-2015-0014

Please direct any questions regarding this case to Louise Gross, Associate Regional Counsel at (312) 866-6844.

Sincerely,

Sarah Marshall, Chief  
Air Enforcement and Compliance Assurance Section (MI/WI)

Enclosure

cc: Ann Coyle, Regional Judicial Officer/C-14J  
Regional Hearing Clerk/E-19J  
Louise Gross/C-14J  
Eric Jones, Illinois Environmental Protection Agency  
Bill Bauman, Wisconsin Department of Natural Resources  
Brian Hutchins, Iowa Department of Natural Resources  
Mark Smith, EPA Region 7

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

<b>In the Matter of:</b>	)	<b>Docket No. CAA-05-2015-0014</b>
	)	
<b>Behr Iron and Metal</b>	)	<b>Proceeding to Assess a Civil Penalty</b>
<b>Rockford, Illinois,</b>	)	<b>Under Section 113(d) of the Clean Air Act,</b>
	)	<b>42 U.S.C. § 7413(d)</b>
<b>Respondent.</b>	)	
<hr/>		

**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 (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 Behr Iron and Metal (Behr), a company doing business in Illinois, Iowa, and Wisconsin.
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. Behr 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. Behr admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Behr 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. Subchapter VI of the CAA, 42 U.S.C. § 7671 *et seq.*, provides for the protection of stratospheric ozone. Section 608(b) of the CAA, 42 U.S.C. § 7671g(b), provides EPA with the authority to regulate the safe disposal of class I and II substances. Class I and II substances include refrigerants containing chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs). EPA promulgated such regulations covering the safe disposal of CFCs and HCFCs from small appliances and motor vehicle air conditioners at 58 Fed. Reg. 28660 (May 14, 1993). These regulations for protection of the stratospheric ozone, recycling and emissions reduction are found in 40 C.F.R. Part 82, Subpart F.

10. Section 110(a) of the CAA, 42 U.S.C. § 7410(a), requires states to submit regulations to EPA providing for the attainment and maintenance of the National Ambient Air Quality Standards. If approved by EPA, these regulations become part of the State Implementation Plan (SIP).

11. In accordance with Section 110(a) of the CAA, on May 31, 1972, EPA approved 35 Illinois Administrative Code (IAC) 201.142 as part of the Illinois SIP. See 37 Fed. Reg. 10862. This rule contains a requirement that no person shall cause or allow the construction of any new emission source or any existing emission source or air pollution control equipment

without first obtaining a construction permit from the Illinois Environmental Protection Agency (Illinois EPA).

12. Effective July 13, 1993, persons who take the final step in the disposal process (including but not limited to scrap recyclers) of small appliances and motor vehicle air conditioners (MVACs), must either recover the refrigerant in accordance with specific procedures or verify with signed statements that the refrigerant was properly recovered prior to receipt of the small appliance or MVAC. See 40 C.F.R. § 82.156(f). If verification statements are used then the scrap recycler must notify the suppliers of the small appliance or MVAC of the need to properly recover the refrigerant. See 40 C.F.R. § 82.156(f)(3). The scrap recycler must keep verification statements on-site for a minimum of three years. See 40 C.F.R. § 82.166(i) and (m).

13. EPA's regulations for the protection of the stratospheric ozone, recycling and emissions reduction define "person" to include any individual or legal entity, including an individual or corporation.

14. EPA's regulations for the protection of the stratospheric ozone, recycling and emissions reduction define a "small appliance" as any appliance that is fully manufactured, charged, and hermetically sealed in a factory with five pounds or less of a class I or class II substance used as a refrigerant, including, but not limited to, refrigerators and freezers (designed for home, commercial, or consumer use), medical or industrial research refrigeration equipment, room air conditioners (including window air conditioners and packaged terminal air heat pumps), dehumidifiers, under the counter ice makers, vending machines, and drinking water coolers. See 40 C.F.R. § 82.152.

15. EPA's regulations for the protection of stratospheric ozone, recycling and emissions reduction define "MVACs" as mechanical vapor compression refrigeration equipment used to cool the driver's or passenger's compartment of any motor vehicle. See 40 C.F.R. §§ 82.32 and 82.152.

16. Section 113(d)(1) 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. Behr owns and operates the following scrap metal recycling facilities (Behr Facilities):

- a. "The Peoria Yard," located at 2424 West Clarke Street, Peoria, Illinois;
- b. "The Peoria Recycling Center," located at 3213 SW Washington Street, Peoria, Illinois;
- c. "The Rockford Yard," located at 1100 Seminary Street, Rockford, Illinois;
- d. "The Rockford Non-Ferrous Warehouse," located at 208 Quaker Road, Rockford, Illinois;
- e. "The Bloomington Yard," located at 501 E. Stewart Street, Bloomington, Illinois;
- f. "The South Beloit Yard," located at 201 Wheeler Avenue, South Beloit, Illinois;

- g. “The South Beloit Recycling Center,” located at 201 Wheeler Avenue, South Beloit, Illinois;
- h. “The Woodstock Yard,” located at 13914 Washington Street, Woodstock, Illinois;
- i. “The Freeport Yard,” located at 1319 RT. 75, Freeport, Illinois;
- j. “The Machesney Park Recycling Center,” located at 8409 N. 2nd Street, Machesney Park, Illinois;
- k. “The Rochelle Recycling Center,” located at 521 N. 2nd Street, Rochelle, Illinois;
- l. “The Mason City Yard,” located at 12050 W. State Street, Mason City, Iowa;
- m. “The Clinton Yard,” located at 2815 Liberty Avenue, Clinton, Iowa;
- n. “The Riceville Yard,” located at 2275 Dale Avenue, Riceville, Iowa; and
- o. “The Monroe Yard,” located at N. 2193 Clarno Rd., Monroe, Wisconsin.

19. Behr is a “person,” as defined by 40 C.F.R. § 82.152.

20. Behr is a person who takes the final step in the disposal process of small appliances and MVACs at certain Behr Facilities and is subject to the requirements of 40 C.F.R. Part 82, Subpart F.

21. At the Peoria Yard, the Rockford Ferrous Yard, the Bloomington Yard, the South Beloit Yard, the Woodstock Yard, the Freeport Yard, the Rochelle Yard, the Clinton Yard, and the Monroe Yard, Behr has accepted small appliances or MVACs without either recovering refrigerant or obtaining verification statements that meet the requirements of 40 C.F.R. § 82.156(f).

22. At the Riceville Yard and the Mason City Yard, Behr buys and sells scrap pursuant to Iowa Administrative Code 567-118 that regulates the “demanufacture” (i.e., the removal of components, including but not limited to PCB-containing capacitors, ballasts, mercury-containing components, fluorescent tubes, and refrigerants) of appliances. As such,

those yards only purchase appliances for recycling from certified demanufacturers. The Riceville Yard is certified to and does accept intact MVACs for demanufacture. The Mason City Yard only accepts MVACs from certified demanufacturers.

23. At the Peoria Recycling Center, the Rockford Non-Ferrous Warehouse, the South Beloit Recycling Center, and the Machesney Park Recycling Center, Behr is not in the regular practice of accepting small appliances or MVACs.

24. On March 21, 2012, Illinois EPA issued a Joint Construction and Lifetime Operation Permit to Behr, authorizing the construction of a new hammermill shredder.

25. On March 28-29, 2012, EPA inspected the Peoria Yard to assess Behr's compliance with the Clean Air Act. During the inspection, Behr representatives provided EPA inspectors with copies of "White Good Component Removal" forms, which they stated were used for "individuals or infrequent suppliers of scrap material." The forms used did not require the customer to include the name or address of the person who removed the refrigerant, or the date the refrigerant was removed. In addition, EPA inspectors saw a new hammermill shredder and associated pollution control equipment substantially installed and being prepared for operation.

26. On September 26, 2012, EPA issued Behr a Notice of Violation and Finding of Violation (NOV/FOV) alleging that the practices found during the inspection and noted in paragraph 25, above, were in violation of 40 C.F.R. § 82.156(f) because Behr neither recovered refrigerant from small appliances nor obtained the name or address of the person who recovered the refrigerant or the date of removal before accepting small appliances. EPA also alleged that Behr had violated SIP rule IAC 201.142 by beginning construction of air pollution control equipment before the issuance of a construction permit by the Illinois EPA.

27. On October 11, 2012, EPA inspected a scrap metal recycling facility then owned and operated by the Morris Tick Company, Inc. (Morris Tick) in Bloomington, Illinois, to assess the facility's compliance with the Clean Air Act. During the inspection, a Morris Tick representative stated that the yard did not collect any paperwork to verify that refrigerant had been properly removed from small appliances.

28. On May 9, 2013, EPA issued Morris Tick a Finding of Violation (FOV) alleging that the practices found during the inspection and noted in paragraph 27 were in violation of 40 C.F.R. § 82.156(f) because it neither recovered refrigerant from small appliances nor obtained proper verification statements before accepting small appliances. On May 31, 2013, Behr acquired certain assets of Morris Tick; the former Morris Tick facility is referred to in this Order as the Bloomington Yard.

29. On November 7, 2012, and August 8, 2013, Behr conferred with EPA concerning the violations referenced in paragraphs 25 and 27, respectively.

#### **Civil Penalty**

30. Based on an analysis of the factors specified in Section 113(e) of the CAA, 42 U.S.C. § 7413(e), the facts of this case, Behr's cooperation, and the Supplemental Environmental Project (SEP) contained in paragraphs 35 to 50, below, Complainant has determined that an appropriate civil penalty to settle this action is \$30,000.

31. Within 30 days after the effective date of this CAFO, Behr must pay the \$30,000 civil penalty by sending a cashier's or certified check, payable to "Treasurer, United States of America," to:



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

For checks sent by express mail, Behr must pay the \$30,000 civil penalty by sending a cashier's or certified check, payable to "Treasurer, United States of America," 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 63101

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

Attn: Compliance Tracker (AE-17J)  
Air Enforcement and Compliance Assurance Branch  
Air and Radiation Division  
U.S. Environmental Protection Agency, Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

Louise Gross (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

32. This civil penalty is not deductible for federal tax purposes.
33. If Behr does not timely pay the entire payment as set forth in paragraph 30, above, the entire unpaid balance of the civil penalty shall become due and owing upon written notice by

EPA to Behr of the delinquency. 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.

34. Behr must pay the following on any amount overdue under this CAFO. Interest will accrue 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). Behr must pay the United States' enforcement expenses, including but not limited to attorneys' fees and costs incurred by the United States for collection proceedings. In addition, Behr must pay a quarterly nonpayment penalty each quarter during which the assessed penalty is overdue. This nonpayment penalty 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).

#### **Supplemental Environmental Project**

35. Behr agrees to complete a SEP designed to further protect the environment and public health by reducing emissions of related air pollutants to the environment. In particular, the SEP will reduce greenhouse gas emissions and other air pollutants from diesel-fired bus engines.

36. Behr must complete the SEP as follows. Behr must purchase, in whole or in part, an alternative fuel school bus for the Rockford School District of Rockford, Illinois (RSD). In this case, an alternative fuel school bus shall mean a bus operated solely on propane. The new bus will be selected by RSD, and must be a replacement for a traditionally-fueled school bus.

The traditionally-fueled school bus must be destroyed once the alternative fuel school bus is put in service.

37. Behr shall complete the SEP within 180 days of the signing of this CAFO.

38. Behr's total expenditures must not be less than \$75,000 on this SEP. No funds counted toward completion of the SEP shall be deductible for federal tax purposes.

39. Behr certifies as follows:

I certify that Behr is not required to perform or develop the SEP by any law, regulation, order, or agreement or as injunctive relief as of the date that I am signing this CAFO. I further certify that Behr has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

I certify that Behr is not a party to any open federal financial assistance transaction that is funding or could be used to fund the same activity as the SEP. I further certify that, to the best of my knowledge and belief after reasonable inquiry, there is no such open federal financial transaction that is funding or could be used to fund the same activity as the SEP, nor has the same activity been described in an unsuccessful federal financial assistance transaction proposal submitted to EPA within two years of the date that I am signing this CAFO (unless the project was barred from funding as statutorily ineligible). For purposes of this certification, the term "open federal financial assistance transaction" refers to a grant, cooperative agreement, loan, federally-guaranteed loan guarantee or other mechanism for providing federal financial assistance whose performance period has not expired.

40. Behr must submit a SEP Completion Report to EPA within 60 days of completion of the SEP. This Completion Report must contain the following information:

- a. Detailed description of the SEP as completed;
- b. Description of any problems executing the SEP and the actions taken to correct the problems;
- c. Certification from the recipients that the funds were spent in conformity with the SEP as described or, if the recipient school has not yet completed the project, certification from the recipient school that any unused funds are being held in an account earmarked for the specified purposes;
- d. Certification or documentation demonstrating that the replaced traditionally fueled school bus was destroyed or disassembled such that it will no longer be operated;

- e. Certification that Respondent has completed the SEP in compliance with this CAFO; and
- f. Description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible).

41. Behr must submit all SEP notices and reports required by this CAFO by first class

mail to:

Attn: Compliance Tracker (AE-17J)  
Air Enforcement and Compliance Assurance Branch  
Air and Radiation Division  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Blvd.  
Chicago, Illinois 60604-3511

42. In each report that Behr submits as provided by this CAFO, it must certify that the report is true and complete by including the following statement signed by a responsible corporate official or an authorized designee:

I certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, the information is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

43. Following receipt of the SEP Completion Report, as described in paragraph 40 above, EPA will notify Behr in writing within 30 days of receipt of each report that:

- a. It has satisfactorily completed the SEP and the SEP Completion Report;
- b. There are deficiencies in the SEP as completed or in the SEP Completion Report and EPA will give Behr 30 days to correct the deficiencies; or
- c. It has not satisfactorily completed the SEP or the SEP Completion Report, and EPA will seek stipulated penalties under paragraph 46, below.

44. If EPA exercises option 43b, above, Behr may object in writing within 10 days of receiving the notice. The parties will have 30 days from EPA's receipt of Behr's objection to reach an agreement. If the parties cannot reach an agreement, EPA will give Behr a written

decision on its objection. Behr will comply with any requirement that EPA imposes in its decision. If Behr does not complete the SEP as required by EPA's decision, Behr will pay stipulated penalties to the United States under paragraph 46, below.

45. Behr agrees that failure to submit a SEP Completion Report shall be deemed a violation of this CAFO, and Behr shall become subject to stipulated penalties pursuant to paragraph 46, below.

46. If Behr violates any requirement of this CAFO relating to the SEP, Behr must pay stipulated penalties to the United States as follows:

- a. Except as provided in subparagraph b, below, if Behr did not complete the SEP satisfactorily according to the requirements of this CAFO, including the schedule in paragraph 40, Behr must pay a penalty of \$25,000.
- b. If Behr did not complete the SEP satisfactorily, but EPA determines that Behr made good faith and timely efforts to complete the SEP and certified, with supporting documents, that it spent at least 90 percent of the amount set forth in paragraph 38, Behr will not be liable for any stipulated penalty under subparagraph a, above.
- c. If Behr completed the SEP satisfactorily, but spent less than 90 percent of the amount set forth in paragraph 38, Behr must pay a penalty of \$15,000.
- d. If Behr did not submit timely the SEP completion report, Behr must pay penalties in the following amounts for each day after the report was due until it submits the report:

<u>Penalty per violation per day</u>	<u>Period of violation</u>
\$25	1 <sup>st</sup> through 14 <sup>th</sup> day
\$50	15 <sup>th</sup> through 30 <sup>th</sup> day
\$100	31 <sup>st</sup> day and beyond

47. EPA's determinations of whether Behr completed the SEP satisfactorily and whether Behr made good faith and timely efforts to complete the SEP will bind Behr.

48. Behr must pay any stipulated penalties within 15 days of receiving EPA's written demand for the penalties. Behr will use the method of payment specified in paragraph 31, above, and will pay interest and nonpayment penalties on any overdue amounts.

49. Any public statement that Behr makes referring to the SEP must include the following language: "Behr undertook this project under the settlement of the United States Environmental Protection Agency's enforcement action against Behr for violations of the Clean Air Act."

50. If an event occurs which causes or may cause a delay in completing the SEP as required by this CAFO:

- a. Behr must notify EPA in writing within 10 days after learning of an event which caused or may cause a delay in completing the SEP. The notice must describe the anticipated length of the delay, its cause(s), Behr's past and proposed actions to prevent or minimize the delay and a schedule to carry out those actions. Behr must take all reasonable actions to avoid or minimize any delay. If Behr fails to notify EPA according to this paragraph, Behr will not receive an extension of time to complete the SEP.
- b. If the parties agree that circumstances beyond the control of Behr caused or may cause a delay in completing the SEP, the parties will stipulate to an extension of time no longer than the period of delay.
- c. If EPA does not agree that circumstances beyond the control of Behr caused or may a delay in completing the SEP, EPA will notify Behr in writing of its decision and any delays in completing the SEP will not be excused.
- d. Behr has the burden of proving that circumstances beyond its control caused or may cause a delay in completing the SEP. Increased costs for completing the SEP will not be a basis for an extension of time under subparagraph b, above. Delay in achieving an interim step will not necessarily justify or excuse delay in achieving subsequent steps.

#### **General Provisions**

51. This CAFO resolves only Behr's liability for federal civil penalties for the violations alleged in this CAFO at the fifteen Behr facilities listed in paragraph 18.

52. 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.

53. This CAFO does not affect Behr's responsibility to comply with the CAA and other applicable federal, state and local laws. Except as provided in paragraph 52, above, compliance with this CAFO will not be a defense to any actions subsequently commenced pursuant to federal laws administered by EPA.

54. Behr has signed an Administrative Consent Order to be issued under Section 113(a) of the CAA, 42 U.S.C. § 7413(a), in which it has agreed to take specific actions in order to achieve and maintain compliance with 40 C.F.R. § 82.156(f).

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

56. The terms of this CAFO bind Behr, its successors and assigns.

57. 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.

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

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

**Behr Iron and Metal, Respondent**

12-19-2014  
Date

Behr Iron & Steel, Inc. DBA

Ronald Coupar  
Ronald Coupar  
Environmental Manager  
Behr Iron and Metal

**United States Environmental Protection Agency, Complainant**

12/23/14  
Date

George T. Czerniak  
George T. Czerniak  
Director  
Air and Radiation Division  
U.S. Environmental Protection Agency, Region 5



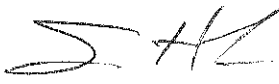
**Consent Agreement and Final Order**  
**In the Matter of: Behr Iron and Metal**  
**Docket No.**

CAA-05-2015-0014

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.

12/30/2014  
Date

  
\_\_\_\_\_  
Susan Hedman  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 5

**Consent Agreement and Final Order**  
**In the Matter of: Behr Iron and Metal**  
**Docket No. CAA-05-2015-0014**

**Certificate of Service**

I certify that I filed the original and one copy of the Consent Agreement and Final Order (CAFO), docket number CAA 05 2015 0014 with the Regional Hearing Clerk (E-19J), United States Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, Chicago, Illinois 60604, and that I mailed the second original copy to Behr by first-class, postage prepaid, certified mail, return receipt requested, by placing it in the custody of the United States Postal Service addressed as follows:

Ronald Coupar  
Environmental Manager  
Behr Iron & Metal  
1100 Seminary Street  
Rockford, Illinois 61104

I certify that I delivered a correct copy of the CAFO by intra-office mail, addressed as follows:

Ann Coyle  
Regional Judicial Officer (C-14J)  
U.S. Environmental Protection Agency  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

I also certify that I mailed a correct copy of the CAFO by first-class mail to:

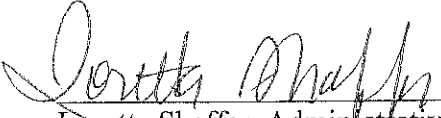
Eric Jones, Manager  
Bureau of Air, Compliance and Enforcement Section  
Illinois Environmental Protection Agency  
P.O. Box 19506  
Springfield, Illinois 62794

Bill Bauman, Acting Director  
Bureau of Air Management  
Wisconsin Department of Natural Resources  
101 S. Webster St.  
PO Box 7921 (AM/7)  
Madison, WI 53702

Brian Hutchins  
Air Quality Bureau  
Iowa Department of Natural Resources  
Environmental Services Division  
7900 Hickman Road, Ste 1  
Windsor Heights, IA 50324

Mark A. Smith, Chief  
Air Permitting and Compliance Branch  
U.S. Environmental Protection Agency  
11201 Renner Blvd.  
Lenexa, KS 66219

On the 31 day of December 2014.

  
Loretta Shaffer, Administrative  
Program Assistant  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER:

7009 1680 0000 7670 1020