

UNITED STATES
ENVIRONMENTAL PROTECTION
AGENCY-REGION 7

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219

BEFORE THE ADMINISTRATOR

IN THE MATTER OF)
)
Evonik Jayhawk Fine Chemical Corporation) Docket No. CAA-07-2012-0012
8545 Southeast Jayhawk)
Galena, Kansas 66739)
)
Respondent)

CONSENT AGREEMENT AND FINAL ORDER

The United States Environmental Protection Agency, Region 7 (EPA) and Evonik Jayhawk Fine Chemical Corporation (Respondent) have agreed to a settlement of this action before filing of a complaint, and thus this action is simultaneously commenced and concluded pursuant to Rules 22.13(b) and 22.18(b)(2) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits (Consolidated Rules), 40 C.F.R. §§ 22.13(b), 22.18(b)(2).

FACTUAL ALLEGATIONS

Jurisdiction

1. This is an administrative action for the assessment of civil penalties instituted pursuant to Section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d). Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(d), the Administrator and the Attorney General jointly determined that this matter, where the first date of alleged violation occurred more than 12 months prior to the initiation of the administrative action, was appropriate for administrative penalty action.

2. This Consent Agreement and Final Order (CAFO) serves as notice that EPA has reason to believe that Respondent has violated the provisions governing Chemical Accident Prevention, and specifically the requirement to implement a Risk Management Plan (RMP) as required by 40 C.F.R. Part 68 and Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and that Respondent is therefore in violation of Section 112(r) of the CAA, 42 U.S.C. § 7412(r). Furthermore, this CAFO serves as notice pursuant to Section 113(d)(2)(A) of the CAA, 42 U.S.C. § 7413(d)(2)(A), of EPA's intent to issue an order assessing penalties for this violation.

Parties

3. The Complainant, by delegation from the Administrator of the EPA, and the Regional Administrator, EPA, Region 7, is the Director, Air and Waste Management Division, EPA, Region 7.

4. The Respondent is Evonik Jayhawk Fine Chemical Corporation, located at 8545 Southeast Jayhawk, Galena, Kansas 66739. The primary activity at Respondent's facility is the manufacturing of organic and inorganic chemicals.

Statutory and Regulatory Requirements

5. On November 15, 1990, the President signed into law the CAA Amendments of 1990. The Amendments added Section 112(r) to the CAA, 42 U.S.C. § 7412(r), which requires the Administrator of EPA to, among other things, promulgate regulations in order to prevent accidental releases of certain regulated substances. Section 112(r)(3), 42 U.S.C. § 7412(r)(3) mandates the Administrator to promulgate a list of regulated substances, with threshold quantities, and defines the stationary sources that will be subject to the accident prevention regulations mandated by Section 112(r)(7). Specifically, Section 112(r)(7) requires the

Administrator to promulgate regulations that address release prevention, detection and correction requirements for these listed regulated substances, 42 U.S.C. § 7412(r)(7).

6. On June 20, 1996, EPA promulgated a final rule known as the Risk Management Program, 40 C.F.R. Part 68, which implements Section 112(r)(7), 42 U.S.C. § 7412(r)(7), of the CAA. These regulations require owners and operators of stationary sources to develop and implement a Risk Management Program that includes a hazard assessment, a prevention program and an emergency response program.

7. The regulations at 40 C.F.R. Part 68, set forth the requirements of a Risk Management Program that must be established at each stationary source. The Risk Management Program is described in a Risk Management Plan (RMP) that must be submitted to EPA.

8. Pursuant to Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7), and 40 C.F.R. § 68.150, the RMP must be submitted by an owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process no later than the latter of June 21, 1999; or the date on which a regulated substance is first present above the threshold quantity in a process.

9. Section 113(d) of the CAA, 42 U.S.C. § 7413(d), states that the Administrator may issue an administrative order against any person assessing a civil administrative penalty of up to \$25,000 per day of violation whenever, on the basis of any available information, the Administrator finds that such person has violated or is violating any requirement or prohibition of the CAA referenced therein, including Section 112(r)(7). Section 113(d) of the CAA, 42 U.S.C. § 7413(d), as amended by the Debt Collection Improvement Act of 1996, authorizes the United States to assess civil administrative penalties of not more than \$27,500 per day for each violation that occurs after January 30, 1997 through March 15, 2004, and \$32,500 per day for

each violation that occurs after March 15, 2004. For each violation of Section 112(r) of the CAA that occurs after January 12, 2009, penalties of up to \$37,500 per day are now authorized.

Definitions

10. The regulations at 40 C.F.R. § 68.3 define “stationary source” in part, as any buildings, structures, equipment, installations or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control) and from which an accidental release may occur.

11. The regulations at 40 C.F.R. § 68.3 define “threshold quantity” as the quantity specified for regulated substances pursuant to Section 112(r)(5) of the CAA, as amended, listed in 40 C.F.R. § 68.130, Table 1, and determined to be present at a stationary source as specified in 40 C.F.R. § 68.115.

12. The regulations at 40 C.F.R. § 68.3 define “regulated substance” as any substance listed pursuant to Section 112(r)(3) of the CAA, as amended, in 40 C.F.R. § 68.130.

13. The regulations at 40 C.F.R. § 68.3 define “process” as any activity involving a regulated substance including any use, storage, manufacturing, handling or on-site movement of such substances, or combination of these activities. For the purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

Alleged Violations

14. EPA alleges that Respondent has violated the CAA and federal regulations, promulgated pursuant to the CAA, as follows:

15. Respondent is, and at all times referred to herein, was a “person” as defined by Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

16. Respondent’s facility located at 8545 Southeast Jayhawk, Galena, Kansas 66739, is a “stationary source” pursuant to 40 C.F.R. § 68.3.

17. Acetaldehyde is a regulated substance pursuant to 40 C.F.R. § 68.3. The threshold quantity for acetaldehyde, as listed in 40 C.F.R. § 68.130, Table 1, is 10,000 pounds.

18. Ammonia, with a concentration greater than 20%, is a regulated substance pursuant to 40 C.F.R. § 68.3. The threshold quantity for ammonia, with a concentration greater than 20%, as listed in 40 C.F.R. § 68.130, Table 1, is 20,000 pounds.

19. Chlorine is a regulated substance pursuant to 40 C.F.R. § 68.3. The threshold quantity for chlorine, as listed in 40 C.F.R. § 68.130, Table 1, is 2,500 pounds.

20. Hydrogen chloride is a regulated substance pursuant to 40 C.F.R. § 68.3. The threshold quantity for hydrogen chloride, as listed in 40 C.F.R. § 68.130, Table 1, is 5,000 pounds.

21. Isopropyl chloroformate is a regulated substance pursuant to 40 C.F.R. § 68.3. The threshold quantity for isopropyl chloroformate, as listed in 40 C.F.R. § 68.130, Table 1, is 15,000 pounds.

22. Methyl chloroformate is a regulated substance pursuant to 40 C.F.R. § 68.3. The threshold quantity for methyl chloroformate, as listed in 40 C.F.R. § 68.130, Table 1, is 5,000 pounds.

23. Anhydrous ammonia is a regulated substance pursuant to 40 C.F.R. § 68.3. The threshold quantity for anhydrous ammonia, as listed in 40 C.F.R. § 68.130, Table 1, is 10,000 pounds.

24. Methyl chloride is a regulated substance pursuant to 40 C.F.R. § 68.3. The threshold quantity for methyl chloride, as listed in 40 C.F.R. § 68.130, Table 1, is 10,000 pounds.

25. On or about May 12-13, 2010, EPA conducted an inspection of Respondent's facility to determine compliance with Section 112(r) of the CAA and 40 C.F.R. Part 68.

26. Records collected during the inspection showed that Respondent has exceeded the threshold quantity for acetaldehyde, ammonia with a concentration greater than 20%, chlorine, hydrogen chloride, isopropyl chloroformate, methyl chloroformate, anhydrous ammonia, and methyl chloride.

27. Respondent is subject to the requirements of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and 40 C.F.R. Part 68, Subpart G, because it is an owner and operator of a stationary source that had more than a threshold quantity of a regulated substance in a process.

28. Respondent was required under Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and 40 C.F.R. Part 68, to develop and implement a Risk Management Program that includes a hazard assessment, a prevention program and an emergency response program.

29. Records collected during the inspection showed that Respondent failed to fully comply with all the requirements of 40 C.F.R. Part 68, specifically:

(i) failure to promptly correct compliance audit findings, in violation of 40 C.F.R. § 68.155(b);

(ii) failure to include planned changes to improve safety in the Executive Summary, in violation of 40 C.F.R. § 68.155(f);

(iii) failure to adequately maintain the anhydrous ammonia vessel, in violation of 40 C.F.R. § 68.73(b);

(iv) failure to implement the Management of Change procedures, leading to a release during production, in violation of 40 C.F.R. §68.75(a);

30. Respondent's failure to comply with 40 C.F.R. Part 68, as set forth above, is a violation of Section 112(r) of the CAA, 42 U.S.C. § 7412(r).

CONSENT AGREEMENT

31. Respondent and EPA agree to the terms of this CAFO and Respondent agrees to comply with the terms of the Final Order portion of this CAFO.

32. For purposes of this proceeding, Respondent admits the jurisdictional allegations set forth above, and agrees not to contest EPA's jurisdiction in this proceeding or any subsequent proceeding to enforce the terms of the Final Order portion of this CAFO.

33. Respondent neither admits nor denies the factual allegations set forth above.

34. Respondent waives its right to a judicial or administrative hearing on any issue of fact or law set forth above and its right to appeal the Final Order portion of this CAFO.

35. Respondent and EPA agree to conciliate this matter without the necessity of a formal hearing and to bear their respective costs and attorney's fees incurred as a result of this action.

36. This CAFO addresses all civil and administrative claims for the CAA violations identified above. Complainant reserves the right to take enforcement action with respect to any other violations of the CAA or other applicable law.

37. Respondent certifies by the signing of this CAFO that to the best of its knowledge, Respondent's facility is in compliance with all requirements of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and all regulations promulgated thereunder.

38. The effect of settlement described in paragraph 36 is conditional upon the accuracy of the Respondent's representations to EPA, as memorialized in paragraph 37, above, of this CAFO.

39. In settlement of this matter, Respondent agrees to complete the following Supplemental Environmental Project ("SEP"), which the parties agree is intended to secure significant environmental and/or public health benefits. Respondent shall install a cooling system on the hydrazine monohydrate tank at Respondent's facility, to better ensure the safety of this chemical, at a cost of no less than Seventy-Two Thousand Dollars (\$72,000), in accordance with the Respondent's SEP Work Plan (attached hereto as Attachment A and incorporated by reference).

40. The total expenditure for the SEP shall be no less than \$72,000 and the SEP shall be completed no later than 180 days from effective date of the Final Order. All work required to complete the SEP shall be performed in compliance with all federal, state, and local laws and regulations.

41. Within thirty (30) days of completion of the SEP, Respondent shall submit a SEP Completion Report to EPA, with a copy to the state agency identified below. The SEP Completion Report shall contain the following:

- (i) A detailed description of the SEP as implemented; and
- (ii) Itemized costs, documented by copies of purchase orders, receipts, or canceled checks.

(iii) All reports shall be directed to the following:

George Hess
U.S. Environmental Protection Agency
Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

42. In itemizing its costs in the SEP Completion Report, Respondent shall clearly identify and provide acceptable documentation for all eligible SEP costs. Where the report includes costs not eligible for SEP credit, those costs must be clearly identified as such. For purposes of this paragraph, “acceptable documentation” includes invoices, purchase orders or other documentation that specifically identifies and itemizes the individual costs of the goods and/or services for which payment is being made. Canceled drafts do not constitute acceptable documentation unless such drafts specifically identify and itemize the individual costs of the goods and/or services for which payment is being made.

43. Respondent agrees to the payment of stipulated penalties as follows: In the event the Respondent fails to comply with any of the terms or provisions of this Consent Agreement relating to the performance of the SEP as set forth in paragraphs 39 and 40 of this CAFO and/or to the extent that the actual expenditures of the SEP does not equal or exceed the cost of the SEP described in paragraphs 39 and 40 of this CAFO, Respondent shall be liable for stipulated penalties according to the provisions set forth below:

- a. Except as provided in subparagraph (ii) and (iii) of this paragraph, if the SEP is not completed satisfactorily and timely pursuant to the agreement set forth in paragraphs 39 and 40 of this CAFO, Respondent shall be liable for and shall pay a stipulated penalty to the United States in the amount of Eighty-Six Thousand Four Hundred Dollars (\$86,400), minus any documented

expenditures determined by EPA to be acceptable for the SEP, for a total equal to 120% of the projected costs of the SEP.

- b. If Respondent fails to timely and completely submit the SEP Completion Report required by paragraph 41, Respondent shall be liable and shall pay a stipulated penalty in the amount of Two Hundred and Fifty Dollars (\$250).
- c. If the SEP is not completed in accordance with paragraphs 39 and 40 of this CAFO, but EPA determines that the Respondent: (a) made good faith and timely efforts to complete the project; and (b) certifies, with supporting documentation, that at least 90% of the amount of money which was required to be spent was expended on the SEP, Respondent shall not be liable for any stipulated penalty.

44. Stipulated penalties shall begin to accrue on the day after performance is due, and shall continue to accrue through the final day of the completion of the activity.

45. Respondent shall pay stipulated penalties not more than fifteen (15) days after receipt of written demand by EPA for such penalties. Method of payment shall be in accordance with the provisions of paragraph 1 of the Final Order portion of this CAFO.

46. Respondent certifies that it is not required to perform or develop the SEP by any federal, state, or local law or regulation; nor is Respondent required to perform or develop the SEP by agreement, grant or as injunctive relief in this or any other case or to comply with state or local requirements. Respondent further certifies that Respondent has not received, and is not presently negotiating to receive, credit in any other enforcement action for the SEP.

47. Respondent certifies that it 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. Respondent

further certifies that, to the best of its 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 of this settlement (unless the project was barred from funding as statutorily ineligible). For the 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 yet expired.

48. For federal income tax purposes, Respondent agrees that it will neither capitalize into inventory or basis nor deduct any costs or expenditures incurred in performing the SEP.

49. Any public statement, oral or written, in print, film or other media, made by Respondent making reference to the SEP shall include the following language: “This project was undertaken in connection with the settlement of an enforcement action taken by the United States Environmental Protection Agency.”

50. Late Payment Provisions. Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. Respondent understands that its failure to timely pay any portion of the civil penalty described in paragraph 1 of the Final Order below or any portion of a stipulated penalty as stated in paragraph 36 above may result in the commencement of a civil action in Federal District Court to recover the full remaining balance, along with penalties and accumulated interest. In such case, interest shall accrue thereon at the applicable statutory rate on the unpaid balance until such civil or stipulated penalty and any accrued interest are paid in full.

51. Respondent consents to the issuance of the Final Order hereinafter recited and consents to the payment of the civil penalty as set forth in the Final Order.

52. The undersigned representative of Respondent certifies that he or she is fully authorized to enter the terms and conditions of the CAFO and to legally bind Respondent to it.

FINAL ORDER

Pursuant to the provisions of the CAA, 42 U.S.C. § 7401 *et seq*, and based upon the information set forth in this Consent Agreement, IT IS HEREBY ORDERED THAT:

1. Respondent shall pay a civil penalty of Six Thousand Seven Hundred and Fifty-Three Dollars (\$6,753) which shall be due within 30 days of entry of this Final Order. Payment shall be by cashier's or certified check made payable to the "United States Treasury" and shall be remitted to:

United State Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
Post Office Box 979077
St. Louis, Missouri 63197-9000.

The payment shall reference docket number CAA-07-2012-0012.

2. Copies of the checks should be sent to:

Regional Hearing Clerk
United States Environmental Protection Agency - Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

and to:

Kristen Nazar
Assistant Regional Counsel
United States Environmental Protection Agency - Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

3. Respondent and Complainant shall bear their own costs and attorneys' fees incurred as a result of this matter.

COMPLAINANT:
U.S. Environmental Protection Agency

Date 11-8-12 By Becky Weber
Becky Weber
Director
Air and Waste Management Division

Date 11/5/2012 By Kristen Nazar
Kristen Nazar
Assistant Regional Counsel
Office of Regional Counsel

RESPONDENT:
Evonik Jayhawk Fine Chemical Corporation

By R. Scott Schultz
Title VP FINANCE & ADMIN.
Date 10/31/12

IT IS SO ORDERED. This Final Order shall become effective immediately.

Date 11/15/12 By Karina Borromeo
Karina Borromeo
Regional Judicial Officer

Hydrazine Monohydrate (HMH) Storage Tank (V-659) Supplemental Cooling Project

Project Objective:

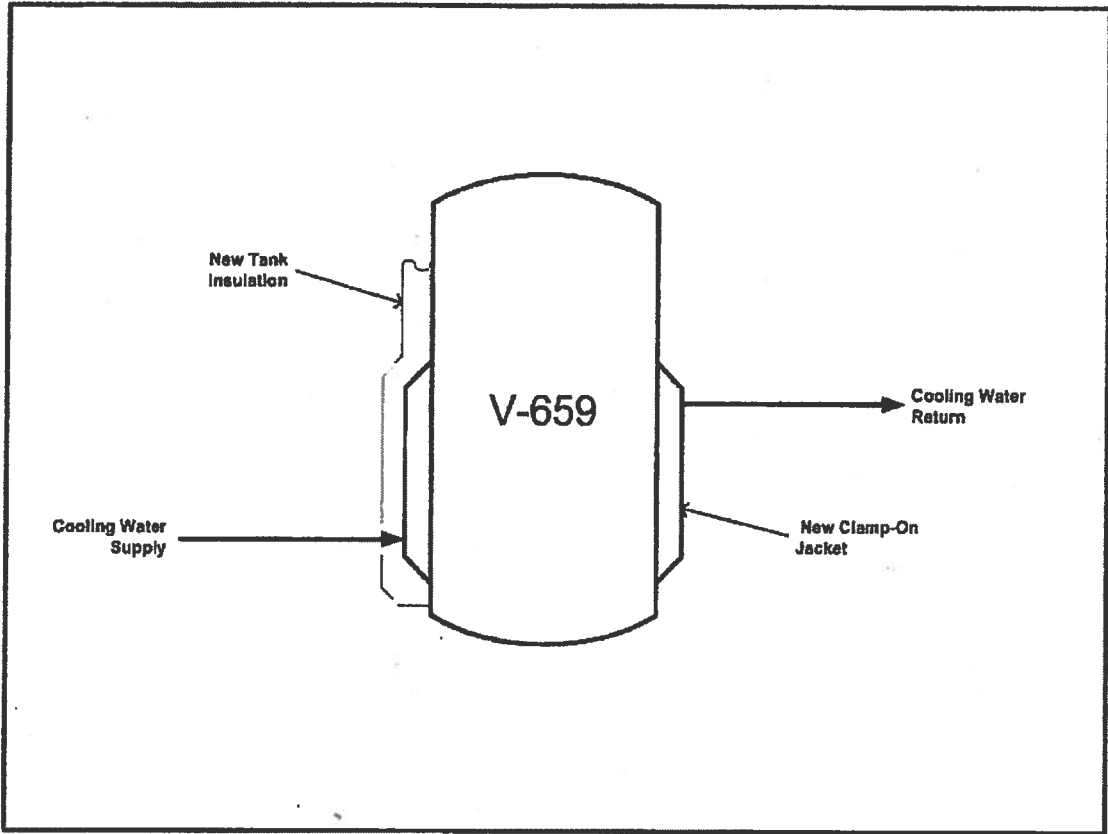
Maintain a temperature in the HMH storage tank (V-659) of less than 100° F. To ensure that this temperature is not exceeded the cooling capability will be designed for 90° F.

Project Scope:

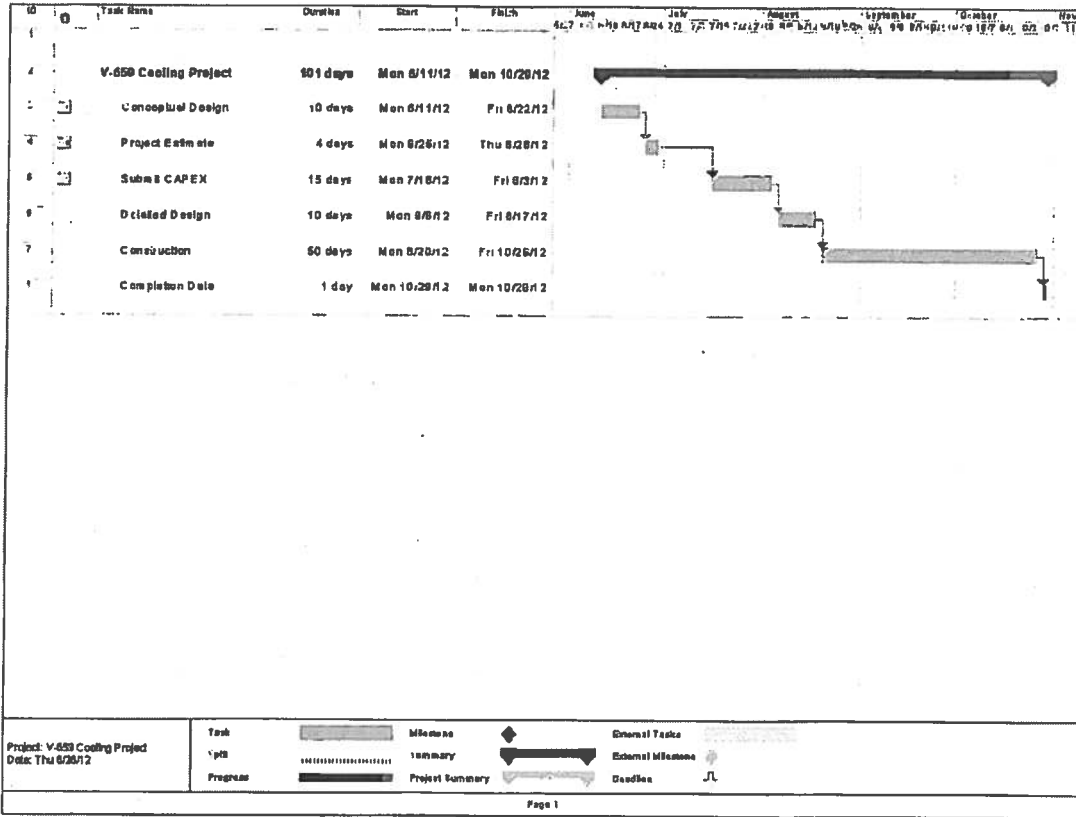
V-659 is a 9,575 gallon stainless steel vessel that currently holds hydrazine monohydrate for use in the manufacture of industrial chemicals. There is currently no temperature control for this tank, but there is a three atmosphere nitrogen blanket normally present within the tank anytime HMH is present. The environmental concern to be addressed by this project is twofold: pollution prevention and improved emergency planning and preparedness.

Elevated temperatures in V-659 due to ambient conditions during the summer months near Galena, KS could result in the presence of hydrazine within the air space of the tank. As hydrazine is a regulated chemical under the Clean Air Act Risk Management Plan (RMP) program (40 CFR Part 68.130) any steps taken to stop the development of hydrazine in the tank or to maintain it below the threshold quantity for the RMP program would either eliminate the risk to be addressed by the RMP program or eliminate or reduce any emissions of hydrazine into the atmosphere. Besides these environmental benefits, it allows the site to improve its environmental management system.

The objective for temperature control for this project is to maintain the HMH at or below a point (with an ample margin of error) such that there would be no doubt that a threshold quantity of hydrazine would ever be present under Part 68.115. The temperature control will be accomplished by the addition of a clamp-on cooling water jacket and vessel insulation. A project timeline and cost estimate are included in the following pages.



Project Timeline:



Project Cost Estimate:

HMH Storage Tank (V-659) Cooling Project Estimate			
Item	Material	Labor	Item Total
Clamp-on Jacket for V-659	\$20,000	\$5,000	\$25,000
Cooling Water Supply and Return Lines	\$10,000	\$10,000	\$20,000
Tank Insulation	\$5,000	\$10,000	\$15,000
		Subtotal	\$60,000
		Engineering	\$12,000
		Total	\$72,000

Sizing Basis:

For the clamp-on jacket and insulation, a Tranter Platecoil style 60 jacket and Armacell Armaflex insulation will be used. To determine the required jacket surface area, the Tranter product data manual was referenced.

First, the heat removal required was determined by using the formula $Q=(A)(U)(\Delta t)$ where A is the vessel surface area, U is the heat transfer coefficient, and Δt is the difference between the design ambient temperature and the desired holding temperature of V-659.

V-659 is a vessel with a 9 foot diameter and an 18.5 foot straight side height with two 2:1 elliptical dished heads. Using these dimensions, the cylinder surface area was determined to be 523.7 ft² and the total head surface area was determined to be 175.6 ft².

The heat transfer coefficient, U, was estimated by using Fig. 86-1 from the Tranter manual. For 25 mph winds and a general range of $\Delta t=60^{\circ}\text{F}$, U (BTU/hr. sq. ft. °F) is equal to 5.7 for an uninsulated vessel and 0.11 for a vessel with 2" insulation. Note that the U values for insulated vessels in the manual assumed a thermal conductivity value of 0.23 (Btu in./hr. sq. ft. °F). The thermal conductivity value for the Armaflex insulation is 0.25 so the U values from the manual are a good approximation.

By analyzing V-659 temperature data trends from two summer weeks (6/15/2012 through 6/29/2012), it was determined the greatest temperature increase experienced in one day is approximately 4.5°F. In addition, the highest temperature in V-659 leveled off around 95°F during a five day span where each day topped 100°F. This data set the goal for maintaining V-659 at 90°F when the ambient temperature is 102°F. This means $\Delta t= 102^{\circ}\text{F} - 90^{\circ}\text{F} = 12^{\circ}\text{F}$.

To properly calculate the heat removal needed, the surface area to be insulated and the jacket surface area need to be accounted for. The plan is to insulate the straight side of the vessel while leaving the heads uninsulated. Also, part of the tank wall will be covered by the jacket so heating of that part of the wall should not be included in the formula.

By using the adapted formula, the heat removal required $Q=(A_C-A_J)(U_I)(\Delta t) + (A_H)(U_B)(\Delta t)$, where A_C is the cylinder surface area, A_J is the jacket surface area, A_H is the head surface area, U_I is the heat transfer coefficient for an insulated vessel, and U_B is the heat transfer coefficient for a bare vessel. For this scenario, the heat removal required is 12,702.8 Btu/hr. minus $1.32 \cdot A_J$.

Now that the heat removal required has been calculated, the jacket surface area needs to be determined. This is done by using the formula $A_J=Q/(U_J \cdot \Delta t_{cw})$

where U_j is the heat transfer coefficient of the jacket and Δt_{cw} is the difference between the desired holding temperature of V-659 and the temperature of the cooling water supply.

The heat transfer coefficient, U_j , was estimated by using Fig. 78-1 from the Tranter manual. For middle range cooling of water/solvents with heat transfer mastic, U_j was estimated to be 25 Btu/hr. sq. ft. °F. Also, the temperature of the cooling water supply was estimated to be 85°F so $\Delta t_{cw} = 90^\circ\text{F} - 85^\circ\text{F} = 5^\circ\text{F}$.

By using the above formula and plugging in the known values, $A_j = (12,702.8 - 1.32 \cdot A_j) / (25 \cdot 5)$. By solving for A_j , it was determined that the required jacket surface area is 100.6 ft².

By referencing the Tranter manual, 2 sections each of 43"x83" Platecoil style 60 KRS and 43"x83" Platecoil style 60 KLS will provide 98.8 ft² of surface area and fit snugly around the circumference of V-659.

By utilizing the clamp-on jacket specified above along with 2" Armaflex insulation on the cylinder portion of V-659, the temperature of the vessel contents will be maintained at or below 90°F throughout the whole year.

IN THE MATTER OF Evonik Jayhawk Fine Chemical Corporation, Respondent
Docket No. CAA-07-2012-0012

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Order was sent this day in the following manner to the addressees:

Copy hand delivered to
Attorney for Complainant:

Kristen Nazar
Assistant Regional Counsel
Region 7
United States Environmental Protection Agency
11201 Renner Blvd.
Lenexa, Kansas 66219

Copy by First Class Certified Mail to:

Lee Braem, Esq.
Senior Corporate Counsel and Chief Compliance Officer
Evonik Degussa Corporation
299 Jefferson Road
Parsippany, New Jersey 07054

Dated:

11/19/12



Kathy Robinson
Hearing Clerk, Region 7