



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

APR 07 2011

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL

RETURN-RECEIPT: 7009 1680 0000 7665 4418

Ms. Chao Xia Zhang-Kirkpatrick, Registered Agent For
Terralpha Industrial Inc.
709 Citadel Dr.
Westmont, Illinois 60559

Re: In the matter of: Terralpha Industrial, Inc., Docket number: **RCRA-05-2011-0008**

Dear Ms. Zhang-Kirkpatrick:

I have enclosed the Complaint filed by the U.S. Environmental Protection Agency against Terralpha Industrial, Inc. under Section 3008(a) of the Solid Waste Disposal Act (SDWA), 42 U.S.C. § 6928(a), and a copy of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), 40 C.F.R. Part 22.

As provided in the Complaint, if you would like to request a hearing, you must do so in your answer to the Complaint. Please note that if you do not file an answer with the Regional Hearing Clerk (E-19J), U.S. EPA, Region 5, 77 West Jackson Blvd., Chicago, IL 60604 within 30 days of your receipt of this Complaint, a default order may be issued and the proposed civil penalty will become due 30 days later. If you choose to file an answer, you also must mail a copy of it to Luis Oviedo, Associate Regional Counsel (C-14J), U.S. EPA, 77 West Jackson Blvd., Chicago, Illinois 60604.

If you intend to file with the Regional Hearing Clerk, as part of the record in this matter, documents that include personal financial information (such as personal income tax returns), you may submit those documents "under seal." The rules for submitting confidential information under seal are set forth at Section 22.5(d) of the Consolidated Rules, 40 C.F.R. § 22.5(d). You also may want to refer to 40 C.F.R. Part 2, Subpart B. For more information on the procedures for submitting information under seal, go to: <http://epa.gov/oalj/orders/alj-practice-manual.pdf>. EPA reserves its right to object to the submission of documents under seal.

In addition, you may file under seal documents containing information in which you believe you have a personal privacy interest. Such personal privacy information may include social security numbers, personal addresses and telephone numbers, dates of birth and medical information. When filing documents in which you believe you have a personal privacy interest, follow the

procedures for submitting confidential business information at Section 22.5(d) of the Consolidated Rules, 40 C.F.R. § 22.5(d).

Whether or not you request a hearing, you may request an informal settlement conference. If you wish to request a conference, or if you have any questions about this matter, please contact Luis Oviedo, Associate Regional Counsel, at (312) 353-9538.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary J. Victorine". The signature is fluid and cursive, written over a light blue horizontal line.

Gary J. Victorine, Acting Chief
RCRA Branch
Land and Chemicals Division

Enclosures

cc: Todd Marvel, RCRA Coordinator, Illinois Environmental Protection Agency
Paul Kirkpatrick, President, Terralpa Industrial, Inc.
Certified Mail #7009 1680 0000 7665 4425
Registered Agent for Terralpa Industrial, Inc.
Certified Mail #7009 1680 0000 7667 1422

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U.S. EPA REGION 5
APR 17 7 PM 3:20

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)
) **DOCKET NO. RCRA-05-2011-0008**
Terralpha Industrial, Inc.,)
Chao Xia Zhang-Kirkpatrick, and)
Paul Kirkpatrick)
2640 Rolling Meadows Drive)
Naperville, Illinois 60564,)
)
)
)
)
Respondents.)
_____)

COMPLAINT AND COMPLIANCE ORDER

Preliminary Statement

1. This civil administrative action is instituted under Section 3008(a) of the Solid Waste Disposal Act, as amended, also known as the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. § 6928(a).
2. The Complainant is the Director of Land and Chemicals Division, United States Environmental Protection Agency (U.S. EPA), Region 5.
3. U.S. 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. Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA; 42 U.S.C. §§ 6912(a)(1), 6926(b), and 6928.
5. Terralpha Industrial, Inc. ("Terralpha") was at all times relevant to this Complaint a corporation doing business in the State of Illinois.

Statutory and Regulatory Background

6. U.S. 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, and 6924.

7. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of U.S. 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.

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

9. At all times relevant to this Complaint, Section 3006(d) of RCRA, 42 U.S.C. § 6926(d), provided that any action taken by a State under a hazardous waste program authorized under this section shall have the same force and effect as action taken by the Administrator under Subchapter III of RCRA, 42 U.S.C. §§ 6921-6939e.

10. Under Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), U.S. 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.

11. The Administrator of U.S. 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, required U.S. 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, U.S. 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.

General Allegations

Terralpha Industrial, Inc., Paul Kirkpatrick and Chao Xia Zhang-Kirkpatrick

12. Terralpha was at all times relevant to this Complaint a corporation incorporated under the laws of Illinois.

13. Chao Xia Zhang -Kirkpatrick and Paul Kirkpatrick were at all times relevant to this Complaint the agents, officers and owners of Terralpha. Terralpha, Chao Xia Zhang - Kirkpatrick and Paul Kirkpatrick shall be collectively herein referred to as "Respondents." Terralpha is currently not in good standing with the Secretary of State of Illinois.

14. At times relevant to this Complaint, Respondents conducted their business at 2640 Rolling Meadows Drive, Naperville, Illinois, and at 709 Citadel Drive, Westmont, Illinois.

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

16. A "primary exporter" includes any person required to originate the manifest for a shipment of hazardous waste, and any intermediary arranging for the export of hazardous waste. 35 Ill Adm. Code 722.151 and 40 C.F.R. § 262.51.

17. Respondents were primary exporters as defined in both 35 Ill. Adm. Code 722.151 and 40 C.F.R. §262.51.

Primary Export of CRTs

18. In the Autumn of 2007, the Respondents contracted with a company located in New Jersey and thereby arranged for the export of several shipping containers from a port in California to Hong Kong, China.

19. At least one of the export containers identified in Paragraph 18 contained no fewer than 10 used, intact, color cathode ray-tube computer monitors ("CRTs").

20. The CRTs contained glass components which contain lead.

21. The CRTs had been discarded and accumulated prior to Respondents' export of the CRTs.

22. The CRTs were being exported for the purpose of their recycling.

23. The CRTs arrived in Hong Kong, China.

The CRTs are Solid Hazardous Waste

24. 35 Ill. Adm. Code 721.102(a)(1) provide that the definition of solid waste includes any discarded material, including any recycled material that is accumulated before recycling.

25. The definition of hazardous waste includes any solid waste that exhibits the toxicity characteristics in subpart C of RCRA. 35 Ill. Adm. Code 721.103(a)(2) and 40 C.F.R. § 261.3(a)(2).

26. The CRTs were a solid waste as defined by the Administrator and Illinois Administrative Code.

27. The CRTs are hazardous waste, as defined by 35 Ill. Adm. Code 721.103(a)(2) and 40 C.F.R. § 261.3(a)(2), in that they exhibit the toxicity characteristic for lead. See 71 Fed. Reg. 42930-42931 (July 28, 2006).

The Conditional Exemption

28. 35 Ill. Adm. Code 721.102(f) and 40 C.F.R. §261.2(f) and provide that “Respondents in actions to enforce regulations implementing subtitle C of RCRA who raise a claim that a certain material is not a solid waste, or is conditionally exempt from regulation, must demonstrate that, *inter alia*, they meet the terms of the exclusion or exemption.”

29. The Respondents omitted language covered by paragraphs 30 and 31 below, and were unable to demonstrate that the CRTs herein were conditionally exempted from regulation or otherwise excluded from the definition of solid waste.

30. In order to be conditionally exempt, an exporter of used, intact CRTs must satisfy the following conditions:

- a. meet the notice and consent conditions of 40 C.F.R. § 261.39(a)(5), and
- b. the used, intact CRTs must not have been speculatively accumulated as provided in 40 C.F.R. §261.1(c)(8).

31. Respondents failed to satisfy either of the conditions above for exemption for the shipment of used intact CRTs described in paragraph 19 herein.

32. In publishing rules requiring notification, consent and recordkeeping for used, intact CRTs exported for either reuse or recycling, the Administrator found that unfettered export of CRTs for recycling could lead to environmental harm, as it has been documented that, in foreign countries, rather than being handled as valuable commodities, CRTs are sometimes managed so carelessly that they pose possible human health and environmental risks from such practices as open burning, land disposal, and dumping into rivers. 71 Fed. Reg. 42928, 42938 (July 28, 2006).

33. In publishing rules requiring notification, consent and recordkeeping for used, intact CRTs exported for either reuse or recycling, the Administrator further found that Sections 2002, 3002, 3007 and 3017 of RCRA provide her authority to impose the notice and recordkeeping requirements she was promulgating, as CRTs sent abroad are sufficiently waste-like to justify the requirements, and because notice and consent help ensure that the CRTs are not discarded. 71 Fed. Reg. 42928, 42938 (July 28, 2006).

Count I
Failure to Comply with the Notice and Consent Requirements
for the Export of Hazardous Waste

34. Paragraphs 1-33 are hereby incorporated by reference.

35. 35 Ill. Adm. Code 722.152 (40 C.F.R. § 262.52) provides, in part, that exports of hazardous waste are prohibited unless notification in accordance with 35 Ill. Adm. Code 722.153 (40 C.F.R. § 262.53) has been provided.

36. That 35 Ill. Adm. Code 722.152(a) provides that a primary exporter of hazardous waste must notify the U.S. EPA of his intent to export hazardous waste, in accordance with 35 Ill. Adm. Code 722.153 (40 CFR § 262.53).

37. That 40 C.F.R. 262.53(a) requires, in part, that a primary exporter of hazardous waste must notify U.S. EPA in writing of an intended export sixty (60) days before the initial shipment is intended to be shipped off site.

38. That Respondent's failure to provide notice, and subsequent export without notice of the exports identified in paragraph 19, constitutes a violation of Ill. Adm. Code §722. 152 (40 C.F.R. §262.52).

39. Respondent's failure to provide notice to the U.S. EPA of its export of color CRTs, as set forth in paragraphs 37-38, constitutes a prohibited export in violation of 35 Ill. Adm. Code 722.152 (40 C.F.R. § 262.52) and consequently, Respondent is liable for a civil penalty to be assessed by the Administrator pursuant to Section 3008(a), 42 U.S.C. § 6928(a).

Count II
Failure to Use a Hazardous Waste Manifest to Ship
an Export of Hazardous Waste

40. Paragraphs 1-33 are hereby incorporated by reference.

41. 35 Ill. Adm. Code 722.154 provides that a primary exporter of hazardous waste must comply with the manifest requirements as specified in 40 C.F.R. § 262.54, and must send a copy of the manifest to the Illinois Environmental Protection Agency ("IEPA").

42. 40 C.F.R. § 262.54 provides that, with certain exceptions identified therein, a

primary exporter must comply with the manifest requirements of 40 C.F.R. §§ 262.20 through 262.23.

43. 40 C.F.R. § 262.20 provides that generators who transport or offer for transport a hazardous waste must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A, according to the instructions included in the appendix to 40 C.F.R. Part 262.

44. With regard to their export of CRTs identified in Paragraph 19, Respondents failed to prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and an EPA Form 8700-22A, if a Form 8700-22A was necessary.

45. With regard to their export of CRTs identified in Paragraph 19, Respondents' failure to prepare a Manifest (OMB Control number 2050-039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A, constitutes a violation of 35 Ill. Adm. Code 722.154 (40 C.F.R. § 262.54), and, consequently, Respondent is liable for a civil penalty to be assessed by the Administrator pursuant to Section 3008(a), 42 U.S.C. § 6928(a).

Count III
Failure to Respond to a RCRA Information Request

46. Paragraphs 1-33 are hereby incorporated by reference.

47. Section 3007(a) of RCRA, 42 USC §6927(a), requires that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall . . . furnish information relating to such wastes" to U.S. EPA.

48. On December 12, 2008, Region 5 officials issued a RCRA information

Request to Respondent, directing that, pursuant to Section 3007(a) of RCRA, 42 USC § 6927(a), Respondent submit responsive information within 30 days of receipt of the information request.

49. Respondent was served with the information request on December 15, 2008.

The response to the information request was due on January 14, 2009.

50. As of July 13, 2009, Respondent had made no response to the information request.

51. Respondent's failure to submit a timely response to the information request is a violation of Section 3007(a) of RCRA, 42 USC § 6927(a), and, consequently, Respondent is liable for a civil penalty to be assessed by the Administrator pursuant to Section 3008(a), 42 U.S.C. § 6928(a).

Civil Penalty

52. Complainant proposes that the Administrator assess a civil penalty of \$ 186,195.00 against Respondent for the violations alleged in this Complaint, as further explained in Attachment A, "Penalty Summary Sheet."

53. Complainant determined the proposed civil penalty according to RCRA Section 3008, 42 U.S.C. § 6928. In assessing a civil penalty, the Administrator of U.S. EPA must consider the seriousness of the violation and any good faith efforts to comply with applicable requirements. *See* Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3). Complainant has considered the facts and circumstances of this case with specific reference to U.S. EPA's 2003 RCRA Civil Penalty Policy. A copy of the penalty policy is available upon request. This policy provides a consistent method of applying the statutory penalty factors to this case.

Compliance Order

54. Based on the foregoing, Respondent is hereby ordered, pursuant to authority in 3008(a) of RCRA, 42 U.S.C. § 6928(a), and 40 C.F.R. § 22.37(b) to comply with the following requirements immediately upon the effective date of this Order:

56. Respondent shall achieve and maintain compliance with all requirements and prohibitions governing the export of hazardous waste applicable to primary exporters, codified at or incorporated by 35 Ill. Adm. Code Part 722 (40 C.F.R. Part 262) by the effective date of this Order.

57. Respondent shall notify U.S. EPA in writing within 15 days of the effective date of this Order either certifying compliance with the Order or explaining why it is not in compliance and proposing a date to achieve compliance.

58. Respondent shall submit all reports, submissions, and notifications required by this Order to the United States Environmental Protection Agency, Region 5, Land and Chemicals Division, RCRA Branch, Attention: William Damico (LR-8J), 77 West Jackson Boulevard, Chicago, Illinois 60604.

Rules Governing this Proceeding

The *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (the Consolidated Rules), 40 C.F.R. Part 22, govern this proceeding to assess a civil penalty. Enclosed with the Complaint served on Respondent is a copy of the Consolidated Rules.

Filing and Service of Documents

Respondent must file with the U.S. EPA Regional Hearing Clerk the original and one copy of each document Respondent intends as part of the record in this proceeding. The Regional Hearing Clerk's address is:

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

Respondent must serve a copy of each document filed in this proceeding on each party pursuant to Section 22.5 of the Consolidated Rules. Complainant has authorized Luis Oviedo to receive any Answer and subsequent legal documents that Respondent serves in this proceeding. You may telephone him at (312) 353-9538. His address is:

Luis Oviedo (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 W. Jackson Blvd. 60604

Terms of Payment

Respondent may resolve this proceeding at any time by paying the proposed penalty by sending a certified or cashier's check payable to the "Treasurer, United States of America," to:

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

Respondent must include the case name, docket number and the billing document number

on the check and in the letter transmitting the check. Respondent must simultaneously send copies of the check and transmittal letter to the Regional Hearing Clerk and Luis Oviedo at the addresses given above, and to:

William Damico (LR-8J)
RCRA Branch
U.S. EPA, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Answer and Opportunity to Request a Hearing

If Respondent contests any material fact upon which the Complaint is based or the appropriateness of any penalty amount, or contends that it is entitled to judgment as a matter of law, Respondent may request a hearing before an Administrative Law Judge. To request a hearing, Respondent must file a written Answer within 30 days of receiving this Complaint and must include in that written Answer a request for a hearing. Any hearing will be conducted in accordance with the Consolidated Rules.

In counting the 30-day period, the date of receipt is not counted, but Saturdays, Sundays, and federal legal holidays are counted. If the 30-day time period expires on a Saturday, Sunday, or federal legal holiday, the time period extends to the next business day.

To file an Answer, Respondent must file the original written Answer and one copy with the Regional Hearing Clerk at the address specified above.

Respondent's written Answer must clearly and directly admit, deny, or explain each of the factual allegations in the Complaint; or must state clearly that Respondent has no knowledge of a particular factual allegation. Where Respondent states that it has no knowledge of a particular

factual allegation, the allegation is deemed denied. Respondent's failure to admit, deny, or explain any material factual allegation in the Complaint constitutes an admission of the allegation.

Respondent's Answer must also state:

- a. the circumstances or arguments which Respondent alleges constitute grounds of defense;
- b. the facts that Respondent disputes;
- c. the basis for opposing the proposed penalty; and
- d. whether Respondent requests a hearing.

If Respondent does not file a written Answer within 30 calendar days after receiving this Complaint, the Presiding Officer may issue a default order, after motion, under Section 22.17 of the Consolidated Rules. Default by Respondent constitutes an admission of all factual allegations in the Complaint and a waiver of the right to contest the factual allegations. Respondent must pay any penalty assessed in a default order, without further proceedings, 30 days after the order becomes the final order of the Administrator of U.S. EPA under Section 22.27(c) of the Consolidated Rules.

Settlement Conference

Whether or not Respondent requests a hearing, Respondent may request an informal conference to discuss the facts alleged in the Complaint and to discuss settlement. To request an informal settlement conference, Respondent may contact William Damico at (312) 353-8207.

Respondent's request for an informal settlement conference will not extend the 30-day period for filing a written Answer to this Complaint. Respondent may simultaneously pursue

both an informal settlement conference and the adjudicatory hearing process. Complainant encourages all parties against whom it proposes to assess a civil penalty to pursue settlement through an informal conference. Complainant, however, will not reduce the penalty simply because the parties hold an informal settlement conference.

Continuing Obligation to Comply

Payment of a civil penalty will not affect Respondent's continuing obligation to comply with RCRA and any other applicable federal, state or local law.

Dated this 7 day of APRIL, 2011.



Richard C. Karl, Acting Director
Land and Chemicals Division
U.S. Environmental Protection Agency
Region 5

Complaint Docket No. RCRA-05-2011-0008

Attachment A
PENALTY SUMMARY SHEET
Terralpha Industrial, Inc.

NATURE OF VIOLATION DATE OF VIOLATION	CITATION OF REGULATION OR LAW	HARM/ DEVIATION	GRAVITY- BASED PENALTY	MULTI-DAY PENALTY	ADJUSTMENTS	ECONOMIC BENEFIT	TOTAL PENALTY
Count 1: Failure to provide notification of intent and obtain consent to export hazardous waste	IAC 722.152	MODERATE/ MAJOR	\$10,703.00				\$10,703.00
Count 2: Failure to use a hazardous waste manifest to ship and export a hazardous waste	IAC 722.154	MAJOR/ MAJOR	\$26,462.00				\$26,462.00
Count 3: Failure to respond to a RCRA request for information	USC 3007	MAJOR/ MAJOR	\$28,330.00	\$120,700.00			\$149,030.00
Subtotals			\$65,495.00	\$120,700.00	\$0.00	\$0.00	\$186,195.00

Note: The gravity-based penalty amount is determined using the Revised Penalty Matrices for the RCRA Civil Penalty Policy, dated January 11, 2005. The multi-day component of the gravity-based civil penalty is determined using the multi-day matrix outlined in the Revised Penalty Matrices for the RCRA Civil Penalty Policy, dated January 11, 2005. Policy adjustments and economic benefit (BEN) are as explained in the 2003 RCRA Civil Penalty Policy. Finally, the gravity-based penalty is adjusted for inflation (where appropriate) in order to implement the Civil Monetary Penalty Inflation Rule pursuant to the Debt Collection Improvement Act of 1996.

CASE NAME: Terralpa Industrial, Inc.
DOCKET NO: RCRA-05-2011-0008

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CERTIFICATE OF SERVICE

I hereby certify that today I filed the original of this **Complaint and Compliance Order** and this **Certificate of Service** in the office of the Regional Hearing Clerk (E-19J), United States Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, Chicago, IL 60604-3590.

I further certify that I then caused true and correct copies of the filed document to be mailed to the following:

Mr. Paul A. Kirkpatrick, President
Terralpa Industrial, Inc.
2640 Rolling Meadows Dr.
Naperville, Illinois 60564

Ms. Chao Xia Zhang-Kirkpatrick, Registered Agent For
Terralpa Industrial Inc.
709 Citadel Dr.
Westmont, Illinois 60559

Registered Agent for Terralpa Industrial Inc.
1274 Rand Rd.
Des Plaines, Illinois 60016

Certified Mail # 's: 7009 1680 0000 7665 4425
7009 1680 0000 7665 4418
7009 1680 0000 7667 1422

Dated: 4/7/11, 2011



Margaret Gray
Administrative Program Assistant
United States Environmental Protection Agency

Region 5
Land and Chemicals Division LR-8J
RCRA Branch
77 W. Jackson Blvd, Chicago, IL 60604-3590