



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

JUL 19 2007

REPLY TO THE ATTENTION OF:

SC-6J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peter Whiting, President
Alliance Tubular Products Company
640 Keystone Street
P.O. Box 2298
Alliance, OH 44601-2298

Re: Alliance tubular Products Company, Alliance, Ohio, Consent Agreement and Final Order, Docket Nos: **CERCLA-05-2007-0016 EPCRA-05-2007-0029 MM-05-2007-0009**

Dear Mr. Whiting:

Enclosed please find a fully executed Consent Agreement and Final Order (CAFO) in resolution of the above case. The U.S. EPA has filed the other original CAFO with the Regional Hearing Clerk on JUL 19 2007.

Please pay the CERCLA civil penalty in the amount of \$4,600 in the manner prescribed in paragraph 51, and reference you check with the billing document number 2750730B017 and the docket number CERCLA-05-2007-0016.

Please pay the EPCRA civil penalty in the amount of \$16,578.25 in the manner prescribed in paragraph 52, and reference you check with the billing document number 2750744E025 and the docket number EPCRA-05-2007-0029.

Your payments are due on AUG 20 2007 [within 30 days of filing date].

Please feel free to contact James Entzminger at (312) 886-4062 if you have any questions regarding the enclosed documents. Please direct any legal questions to Stephen Thorn Assistant Regional Counsel, at (312) 353-9715. Thank you for your assistance in resolving this matter.

Sincerely yours,

Mark J. Horwitz, Chief
Chemical Emergency Preparedness
and Prevention Section

Enclosure

cc: Regional Hearing Clerk
U.S. EPA Region 5

Stephen Thorn (w/ enclosure)

Ms. Cindy DeWulf, Co-Chairperson (w/ enclosure)
Ms. Nancy Dragani, Co-Chairperson (w/ enclosure)
Jeff Beattie (w/ enclosure)
Mel House (w/ enclosure)
Ohio SERC

Marcy Toney
Regional Judicial Officer

David R. Sargent, General Counsel (w/ enclosure)
PTC Alliance
Copperleaf Corporate Centre
6051 Wallace Road Ext, Suite 200
Wexford, PA 15090 (certified)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

CERCLA-05-2007-0016

IN THE MATTER OF:

Alliance Tubular Products Company
Alliance, Ohio 44601

) Docket Nos. **EPCRA-05-2007-0029**
) **MM-05-2007-0009**
) Proceeding to Assess a Civil Penalty under
) Section 109(b) of the Comprehensive
) Environmental Response, Compensation,
) and Liability Act, and 325(b)(2) of the
) Emergency Planning and Community
) Right-to-Know Act of 1986.

Consent Agreement and Final Order
Preliminary Statement

1. This is an administrative action commenced and concluded under Section 109(b) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. § 9609(b), Section 325(b)(2) of the Emergency Planning and Community Right-To-Know Act of 1986 (EPCRA), 42 U.S.C. § 11045(b)(2), and Sections 22.13(b) and 22.18(b)(2) and (3) of the “Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits” (Consolidated Rules) as codified at 40 C.F.R. Part 22 (2007).

2. The Complainant is, by lawful delegation, the Branch Chief, Emergency Response Branch 1, Superfund Division, Region 5, United States Environmental Protection Agency (U.S. EPA).

3. Respondent is Alliance Tubular Products Company, a Delaware corporation, doing business in the State of Ohio.

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) (2007).

5. The parties agree that settling this action without the filing of a Complaint or the adjudication of any issue of facts or law is in their interest and in the public interest.

6. Respondent consents to entry of this CAFO and the assessment of the specified civil penalty, and agrees to comply with the terms of the CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Alliance Tubular Products Company admits the jurisdictional allegations in this CAFO and neither admits or denies the factual allegations in this CAFO.

8. Alliance Tubular Products Company 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. Section 103(a) of CERCLA, 42 U.S.C. § 9603(a), requires any person in charge of a facility to immediately notify the National Response Center (NRC) as soon as that person has knowledge of any release of a hazardous substance from the facility in an amount equal to or greater than the hazardous substance's reportable quantity.

10. Section 304(a)(3)(A) of EPCRA, 42 U.S.C. § 11004(a)(3)(A), requires that the owner or operator of a facility must immediately provide notice, as described in Section 304(b) of EPCRA, 42 U.S.C. § 11004(b), if a release of a hazardous substance in quantities equal to or greater than a reportable quantity occurs from a facility at which hazardous chemicals are produced, used, or stored and such release requires notice under Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

11. Under Section 304(b) of EPCRA, 42 U.S.C. § 11004(b), notice required under

§ 304(a) of EPCRA, 42 U.S.C. § 11004(a), must be given immediately after the release by the owner or operator of a facility to the community emergency coordinator for the local emergency planning committee (LEPC) for any area likely to be affected by the release and to the state emergency planning commission (SERC) of any state likely to be affected by a release.

12. Section 304(c) of EPCRA, 42 U.S.C. § 11004(c), requires that, as soon as practicable after a release which requires notice under Section 304(a) of EPCRA, 42 U.S.C. § 11004(a), the owner or operator of the facility must provide written follow-up emergency notice setting forth and updating the information required under Section 304(b), 42 U.S.C. § 11004(b).

13. Under Section 109(b) of CERCLA, 42 U.S.C. § 9609(b), and Section 325(b) of EPCRA, 42 U.S.C. § 11045(b), the U.S. EPA Administrator may assess a civil penalty of up to \$25,000 per day of violation of CERCLA Section 103 and up to \$25,000 per day of violation of EPCRA Section 304. The Debt Collections Improvements Act of 1996, 31 U.S.C. § 3701, and its implementing regulations at 40 C.F.R. Part 19 increased these statutory maximum penalties to \$27,500 per day of violation that occurred from January 31, 1997 through March 15, 2004, and to \$32,500 per day for violations that occurred after March 15, 2004.

Factual Allegations and Violations

14. Respondent is a “person” as that term is defined under Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

15. Respondent is a “person” as that term is defined under Section 329(7) of EPCRA, 42 U.S.C. § 11049(7).

16. At all times relevant to this CAFO, Respondent was an owner or operator of the Facility located at 640 Keystone Street, Alliance, Ohio (Facility).

17. At all times relevant to this CAFO, Respondent was in charge of the Facility.

18. Respondent's Facility consists of buildings, structures, installations, equipment, pipe or pipelines, storage container, or any site or area where a hazardous substance has been deposited, stored, placed, or otherwise come to be located.

19. Respondent's Facility is a "facility" as that term is defined under Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

20. Respondent's facility consists of buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites, and which are owned or operated by the same person.

21. Respondent's Facility is a "facility" as that term is defined under Section 329(4) of EPCRA, 42 U.S.C. § 11049(4).

22. Spent pickle liquor, Resource Conservation and Recovery Act hazardous waste code K062, is a "hazardous substance" as that term is defined under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

23. Spent pickle liquor, Resource Conservation and Recovery Act hazardous waste code K062, has a reportable quantity of 10 pounds, as indicated at 40 C.F.R. Part 302, Table 302.4.

24. Spent pickle liquor, Resource Conservation and Recovery Act hazardous waste code K062, is a "hazardous chemical" within the meaning of Section 311(e) of EPCRA, 42 U.S.C. § 11021(e).

25. At all times relevant to this CAFO, spent pickle liquor, Resource Conservation and Recovery Act hazardous waste code K062, was produced, used or stored at Respondent's Facility.

26. On October 10, 2005, at or about 3:40 p.m., a release occurred from Respondent's Facility of approximately 2,443 pounds of spent pickle liquor, Resource Conservation and Recovery Act hazardous waste code K062 (the "release").

27. In a 24 hour time period, the release of spent pickle liquor, Resource Conservation and Recovery Act hazardous waster code K062, exceeded 10 pounds.

28. During the release, approximately 2,443 pounds of spent pickle liquor spilled, leaked, poured, emptied, discharged, escaped, or dumped, into the navigable waters, surface water, ground water, land surface or subsurface strata water, or land.

29. The release is a "release" as that term is defined under Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

30. The release is a "release" as that term is defined under Section 329(8) of EPCRA, 42 U.S.C. § 11049(8).

31. Respondent had knowledge of the release on October 10, 2005, at approximately 3:40 p.m.

32. The release was one for which notice was required under Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

33. The release required notice under Section 304(a) of EPCRA, 42 U.S.C. § 11004(a).

34. The release was likely to affect Ohio.

35. At all times relevant to this CAFO, the Ohio State Emergency Response Commission was the state emergency response commission (SERC) for Ohio, under Section 301(a) of EPCRA, 42 U.S.C. § 11001(a).

36. The release was likely to affect Stark County, Ohio.

37. At all times relevant to this CAFO, the Stark County Local Emergency Planning Committee was the local emergency planning committee (LEPC) for Stark County, Ohio, under Section 301(c) of EPCRA, 42 U.S.C. § 11001(c).

38. Respondent notified the NRC of the release on October 10, 2005, at 7:15 p.m.

39. Respondent did not immediately notify the NRC as soon as Respondent had knowledge of the release.

40. Respondent's failure to immediately notify the NRC of the release is a violation of Section 103(a) of CERCLA, 42 U.S.C. § 9603(a).

41. Respondent notified the SERC of the release on October 10, 2005, at 7:35 p.m.

42. Respondent did not immediately notify the SERC after Respondent had knowledge of the release.

43. Respondent's failure to immediately notify the SERC of the release is a violation of Section 304(a) of EPCRA, 42 U.S.C. § 11004(a).

44. Respondent notified the LEPC of the release on October 10, 2005, at 7:48 p.m.

45. Respondent did not immediately provide notice to the LEPC after Respondent had knowledge of the release.

46. Respondent's failure to immediately notify the LEPC of the release is a violation of Section 304(a) of EPCRA, 42 U.S.C. § 11004(a).

47. As of February 24, 2006, Respondent had not provided the written follow-up emergency notice to the LEPC.

48. Respondent did not provide the LEPC with written follow-up emergency notice of the release as soon as practicable after the release occurred.

49. Each day Respondent failed to provide written follow-up emergency notice to the LEPC as soon as practicable after the release occurred is a violation of Section 304(c) of EPCRA, 42 U.S.C. § 11004(c).

Civil Penalty

50. In consideration of Respondent's agreement to perform a supplemental environmental project, cooperation, willingness to quickly resolve this matter, and litigation risk, the U.S. EPA has determined that an appropriate civil penalty to settle this action is \$21,178.25.

51. Within 30 days after the effective date of this CAFO, Respondent must pay a \$4,600 civil penalty for the CERCLA violation. Respondent must pay the penalty by sending a cashier's or certified check, payable to "EPA Hazardous Substance Superfund," to:

U.S. EPA – Region 5
ATTN: Superfund Receivables
P.O. Box 371531
Pittsburgh, PA 15251-7531

The check must note the case title of this matter: In the Matter of Alliance Tubular Products Company, the docket number of the CAFO CERCLA-05-2007-0016 and the billing document number 2750730B017.

52. Within 30 days after Respondent must pay a \$16,578.25 civil penalty for the EPCRA violations. Respondent must pay the penalty by sending a cashier's or certified check, payable to the "Treasurer, United States of America," to:

U.S. EPA – Region 5
ATTN: Finance
P.O. Box 371531
Pittsburgh, PA 15251-7531

The check must note the case title of this matter: In the Matter of Alliance Tubular Products Company, the docket number EPCRA-05-2007-0029 of the CAFO and the billing document number 2750744E025.

53. A transmittal letter, stating the case title, Respondent's complete address, the case docket number, and the billing document number must accompany each payment. Respondent must send a copy of the checks and transmittal letter to:

Regional Hearing Clerk, (E-13J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

James Entzminger, (SC-6J)
Chemical Emergency Preparedness
and Prevention Section
77 West Jackson Boulevard
Chicago, IL 60604-3590

Stephen Thorn, (C-14J)
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

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

55. If Respondent does not timely pay the civil penalty, or any stipulated penalties due under paragraph 68, below, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States' enforcement expenses for the collection action. The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

56. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 31 U.S.C. § 3717. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, U.S. EPA will

assess a six percent per year penalty on any principal amount not paid within 90 days of the date that this CAFO had been entered by the Regional Hearing Clerk.

Supplemental Environmental Projects

57. Respondent must complete the supplemental environmental projects (SEPs) designed to protect the environment or public health by replacing the clay lined diesel secondary containment with a polypropylene containment basin and installing a polypropylene bed liner in the spent pickle liquor containment area.

58. At its Alliance, Ohio facility, Respondent must complete the SEPs as follows:

- a. Within 16 weeks of the effective date of the CAFO, Respondent will replace the impervious clay lined diesel containment area with a polypropylene containment basin.
- b. Within 16 weeks of the effective date of the CAFO, Respondent will replace the coating in the spent pickle liquor containment area with a polypropylene liner.

59. Respondent must spend at least \$55,560 to purchase and install the SEP in paragraph 58.a. and \$17,875 to purchase and install the SEP in paragraph 58.b.

60. Respondent certifies that it is not required to perform or develop the SEPs by any law, regulation, grant, order, or agreement, or as injunctive relief as of the date it signs this CAFO. Respondent further certifies that it has not received, and is not negotiating to receive, credit for the SEPs in any other enforcement action.

61. U.S. EPA may inspect the Facility at any time to monitor Respondent's compliance with this CAFO's SEP requirements.

62. Respondent must maintain copies of the underlying research and data for all reports submitted to U.S. EPA according to this CAFO. Respondent must provide the documentation of any underlying research and data to U.S. EPA within seven days of U.S. EPA's request for the information.

63. Within 20 weeks after the effective date of the CAFO, Respondent must submit a SEP completion report to U.S. EPA. This report must contain the following information:

- a. Detailed description of each SEP as completed;
- b. Description of any operating problems and the actions taken to correct the problems;
- c. Itemized costs of goods and services used to complete each SEP, documented by copies of invoices, purchase orders, or canceled checks that specifically identify and itemize the individual costs of the goods and services;
- d. Certification that Respondent has completed each SEP in compliance with this CAFO; and
- e. Description of the environmental and public health benefits resulting from each SEP, quantifying the benefits and pollution reductions, if feasible.

64. Respondent must submit all notices and reports required by this CAFO by first

class mail to:

James Entzminger (SC-6J)
Chemical Emergency Preparedness
and Prevention Section
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

65. In each report that Respondent submits as provided by this CAFO, it must certify that the report is true and complete by including the following statement signed by one of its officers:

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.

66. Following receipt of the SEP completion report described in paragraph 63 above, U.S. EPA must notify Respondent in writing that:

- a. It has satisfactorily completed the SEPs and the SEP report;

- b. There are deficiencies in the SEP(s) as completed or in the SEP report and U.S. EPA will give Respondent 30 days to correct the deficiencies; or
- c. It has not satisfactorily completed the SEP(s) or the SEP report and U.S. EPA will seek stipulated penalties under paragraph 68.

67. If U.S. EPA exercises option b. above, Respondent may object in writing to the deficiency notice within 10 days of receiving the notice. The parties will have 30 days from U.S. EPA's receipt of Respondent's objection to reach an agreement. If the parties cannot reach an agreement, U.S. EPA will give Respondent a written decision on its objection. Respondent will comply with any requirements that U.S. EPA imposes in its decision. If Respondent does not complete the SEP(s) as required by U.S. EPA's decision, Respondent will pay stipulated penalties to the United States under paragraph 68 below.

68. If Respondent violates any requirement of this CAFO relating to the SEPs, Respondent must pay stipulated penalties to the United States as follows:

- a. If Respondent has spent less than the amount set forth in paragraph 59, above, Respondent must pay a stipulated penalty equal to the difference between the amount it spent on the SEP(s) and the amount set forth in paragraph 59.
- b. If Respondent has completed the SEP(s), but the SEP is not satisfactory, Respondent must pay \$12,707, in addition to any penalty required under Subparagraph a, above.
- c. If Respondent halts or abandons work on the SEP(s), the Respondent must pay a stipulated penalty of \$31,767, in addition to the penalty required under Subparagraph a, above. Such penalties will accrue as of the date for completing the SEP or the date performance ceases, whichever is earlier.
- d. If Respondent fails to comply with the schedule in paragraph 58 for implementing the SEP(s), or fails to submit timely the SEP completion report, Respondent must pay Stipulated Penalties for each failure to meet an applicable milestone, as follows:

<u>Penalty Per Violation Per Day</u>	<u>Period of Noncompliance</u>
\$ 500	1st through 14 th day
\$1,000	15 th through 30 th day
\$1,500	31 st day and beyond

These penalties will accrue from the date Respondent was required to meet each milestone, until it achieves compliance with the milestone.

69. U.S. EPA's determinations of whether Respondent satisfactorily completed the SEP(s) and whether it made good faith, timely efforts to complete the SEP(s) will bind Respondent.

70. Respondent must pay any stipulated penalties within 15 days of receiving U.S. EPA's written demand for the penalties. Respondent will use the method of payment specified in paragraphs 51-53, above, and will pay interest, handling charges, and nonpayment penalties on any overdue amounts. The stipulated penalty will be divided with five percent to the "EPA Hazardous Substance Superfund," and the remainder to "Treasurer, United States of America."

71. Any public statement that Respondent makes referring to the SEPs must include the following language, "Respondent undertook this project under the settlement of the United States Environmental Protection Agency's enforcement action against Respondent for violations of CERCLA Section 103 and EPCRA Section 304."

72. Nothing in this CAFO is intended to nor will be construed to constitute a U.S. EPA approval of the equipment or technology installed by Respondent in connection with the SEPs under the terms of this Agreement.

73. Respondent must make the following certification to the U.S. EPA at the time it submits its tax returns for the taxable year 2007 to the IRS:

"Under penalties of perjury, I declare that I have examined the tax returns pertaining to the year 2007. To the best of my knowledge and belief, these tax returns do not contain deductions of depreciation for any supplemental environmental project expenses my company had incurred."

Respondent must send the certification to:

James Entzminger (SC-6J)

Chemical Emergency Preparedness
and Prevention Section
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3511

74. The costs of the SEP are not deductible or depreciable for federal tax purposes.

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

- a. Respondent must notify U.S. 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), Respondent's past and proposed actions to prevent or minimize the delay, and a schedule to carry out those actions. Respondent must take all reasonable actions to avoid or minimize any delay. If Respondent fails to notify U.S. EPA according to this paragraph, Respondent will not receive an extension of time to complete the SEP.
- b. If the parties agree that circumstances beyond the control of Respondent 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 U.S. EPA does not agree that circumstances beyond the control of Respondent caused or may cause a delay in completing the SEP, U.S. EPA will notify Respondent in writing of its decision and any delays in completing the SEP will not be excused.
- d. Respondent 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

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

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

78. This CAFO does not affect Respondent's responsibility to comply with CERCLA, EPCRA, and other applicable federal, state and local laws, and regulations.

79. This CAFO is a "final order" for purposes of U.S. EPA's Enforcement Response Policy for Section 103 of CERCLA and Section 304 of EPCRA.

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

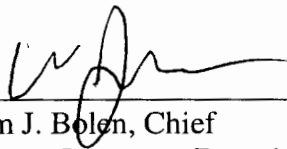
81. Each person signing this consent agreement certifies that he or she has the authority to sign this consent agreement for the party whom he or she represents and to bind that party to its terms.

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

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

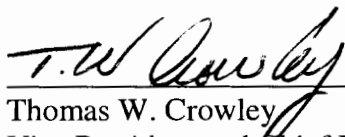
SIGNATORIES

U.S. Environmental Protection Agency Complainant

Date: 7/13/07 By: 
William J. Bolon, Chief
Emergency Response Branch 1
Superfund Division
U.S. EPA Region 5

Date: 7/17/07 By: Donald A. Bruce for
Richard C. Karl, Director
Superfund Division
U.S. EPA Region 5

Alliance Tubular Products Company Respondent

Date: 7/6/07 By: 
Thomas W. Crowley
Vice President and Chief Financial Officer

Consent Agreement and Final Order

IN THE MATTER OF:

Alliance Tubular Products Company

Alliance, Ohio

Docket Nos. CERCLA-05-2007-0016 EPCRA-05-2007-0029 MM-05-2007-0009

Consent Agreement and Final Order

IN THE MATTER OF:

Alliance Tubular Product Company


Alliance, Ohio

Docket Nos. CERCLA-05-2007-0016 EPCRA-05-2007-0029 MM-05-2007-0009

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. IT IS SO ORDERED.

Date: July 18, 2007

By: 

Mary A. Gade
Regional Administrator
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

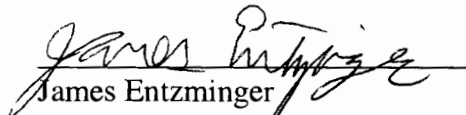
Certificate of Service

I, James Entzminger, certify that I hand delivered one original and one copy of the
Consent Agreement and Final Order, docket numbers CERCLA-05-2007-0016 EPCRA-05-2007-0029
MM-05-2007-0009
to the Regional Hearing Clerk, Region 5, United States Environmental Protection
Agency, personally served a copy on the Regional Judicial Officer, via interoffice mail,
and mailed one original by first-class, postage prepaid, certified mail, return receipt
requested, to Respondent and Respondent's Counsel by placing them in the custody of
the United States Postal Service addressed as follows:

Peter Whiting, President
Alliance Tubular Products Company
640 Keystone Street
P.O. Box 2298
Alliance, OH 44601-2298

David R. Sargent, General Counsel
PTC Alliance
Copperleaf Corporate Centre
6051 Wallace Road Ext, Suite 200
Wexford, PA 15090

on the 19 day of July, 2007.


James Entzminger
U.S. Environmental Protection Agency
Region 5

**Consent Agreement and Final Order
IN THE MATTER OF:
Alliance Tubular Products Company
Alliance, Ohio**
Docket Nos. CERCLA-05-2007-0016 EPCRA-05-2007-0029
MM-05-2007-0009