

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

In the matter of:

Genpak LLC
Glens Falls, New York

Respondent

In a proceeding under Section 113(d)
of the Clean Air Act, 42 U.S.C. § 7413(d)

CONSENT AGREEMENT
AND
FINAL ORDER

CAA-02-2017-1201

CONSENT AGREEMENT

A. PRELIMINARY STATEMENT

1. This is an administrative penalty assessment proceeding brought under Section 113(d) of the Clean Air Act (the "Act"), 42 U.S.C. § 7413(d), and Sections 22.13 and 22.18 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 United States Environmental Protection Agency, Region 2 (the "EPA"). On the EPA's behalf, the Director of the Division of Enforcement and Compliance Assistance for the EPA is delegated the authority to settle civil administrative penalty proceedings under Section 113(d) of the Act.
3. Respondent is Genpak LLC, a limited liability company doing business in the state of New York. Respondent is a "person" as defined in Section 302(e) of the Act, 42 U.S.C. § 7602(e).

4. Complainant and Respondent, having agreed that settlement of this action is in the public interest, consent to the entry of this consent agreement (“Consent Agreement” or “Agreement”) and the attached final order (“Final Order” or “Order”) without adjudication of any issues of law or fact herein, and Respondent agrees to comply with the terms of this Consent Agreement and Final Order.

B. JURISDICTION

5. This Consent Agreement is entered into under Section 113(d) of the Act, as amended, 42 U.S.C. § 7413(d), and the Consolidated Rules, 40 C.F.R. Part 22. The alleged violations in this Consent Agreement are pursuant to Section 113(a)(1)(B) of the Act.
6. In satisfaction of the notice requirements of Section 113(a) of the Act, on April 29, 2016, the EPA issued to Respondent a notice of violation (“NOV”) and provided a copy of the NOV to New York State, providing notice to both that the EPA found that Respondent committed the violations described in Section E of this Agreement and providing Respondent an opportunity to confer with the EPA. On June 8, 2016 and October 17, 2016, representatives of Respondent and the EPA discussed the April 29, 2016 NOV.
7. The Regional Administrator is authorized to ratify this Consent Agreement which memorializes a settlement between Complainant and Respondent. *See* 40 C.F.R. § 22.4(b) and 22.18(b). Pursuant to EPA Region 2 Delegation of Authority 7-6-C, the Region 2 Regional Administrator has delegated to the Regional Judicial Officer the authority to issue consent orders memorializing settlements providing for a penalty no greater than \$37,500 between the agency and respondents resulting from administrative enforcement actions under the Act.
8. The EPA and the United States Department of Justice jointly determined that this matter,

although it involves alleged violations that occurred more than one year before the initiation of this proceeding, is appropriate for an administrative penalty assessment.

42 U.S.C. § 7413(d); 40 C.F.R. § 19.4.

9. The issuance of this Consent Agreement and attached Final Order simultaneously commences and concludes this proceeding. *See* 40 C.F.R. § 22.13(b).

C. GOVERNING LAW

10. Section 109 of the CAA directs the EPA Administrator to promulgate regulations establishing national ambient air quality standards (“NAAQS”) for each air pollutant for which air quality criteria have been issued pursuant to Section 108 of the Act.
11. Section 110(a)(1) of the CAA requires each state to adopt and submit to the EPA for approval, a plan that provides for the implementation, maintenance, and enforcement of each of the NAAQS. Such plans, once approved by the EPA, are known as State Implementation Plans, or SIPs.
12. At all times relevant, the federally approved SIP for the State of New York has included N.Y. Comp. Codes R. & Regs. tit. 6, § 200.1 (“6 NYCRR § 200.1”) and 6 NYCRR § 200.7. *See* 6 NYCRR § 200.1 (EPA approved July 17, 2013); 6 NYCRR § 200.7 (EPA approved April 22, 2008).
13. At all times relevant, the NY SIP has included the following definitions:
 - “Person” means: “Any individual, public or private corporation, political subdivision, government agency, department or bureau of the State, municipality, industry, copartnership, association, firm, trust, estate or any other legal entity whatsoever.” 6 NYCRR § 200.1(bi).

- “Air contamination source” means: “Any apparatus, contrivance or machine capable of causing emission of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. Where a process at an emission unit uses more than one apparatus, contrivance or machine in combination, the combination may be considered a single emission source.” 6 NYCRR § 200.1(f).
- “Lower Orange County metropolitan area” means “The area including the Towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury.” 6 NYCRR § 200.1(al).
- “Reasonably available control technology (“RACT”)” means “Lowest emission limit that a particular source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility.” 6 NYCRR § 200.1(bq).

14. The NY General Provisions contain a “Maintenance of equipment” provision that states:

“Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer’s specifications, required to operate such device effectively.” 6 NYCRR § 200.7 (2008).

15. At all times relevant, the federally approved SIP for the State of New York has included 6 NYCRR Title 6 Part 212 (EPA approved July 12, 2013). *See* 6 NYCRR Part 212 (2013); *see also* 78 Fed. Reg. 41846 (Jul. 12, 2013).¹
16. At all times relevant, the definitions from 6 NYCRR Part 200 apply to 6 NYCRR Part 212. *See* 6 NYCRR 212.1(a).
17. Facilities located outside the lower Orange County or New York City metropolitan areas with an annual potential to emit 50 tons or more of volatile organic compounds (“VOCs”) must comply with 6 NYCRR § 212.10. *See* 6 NYCRR § 212.10(a)(2).
18. The NY SIP requires that: “Owners and/or operators of emission points subject to this Part which emit nitrogen oxides or volatile organic compounds located at facilities described in subdivision (a) of this section must submit a compliance plan to the department by October 20, 1994. The compliance plan must either include the reasonably available control technology (RACT) analysis required by subdivision (c) of this section or a plan to limit the annual potential to emit below the applicability levels pursuant to subdivision (d) of this section.” 6 NYCRR § 212-3.1; which was formerly 6 NYCRR § 212.10(b).
19. The NY SIP requires, among other things, a compliance plan that includes a reasonably available control technology (“RACT”) analysis for emissions points from major VOC facilities with VOC emission rates of at least 3.0 pounds of VOCs per hour. *See* 6 NYCRR § 212.10(c).

¹ On June 3, 2015 NYSDEC repealed Part 212 and added a new Part 212 with substantially similar regulatory language, but different statutory numbers. However, this Agreement references EPA’s approved NY SIP found at: https://www3.epa.gov/region02/air/sip/ny_reg.htm. *See* 40 C.F.R. Part 52 Subpart HH.

20. The NY SIP requires that, beginning on May 31, 1995, the owner or operator of any facility that submits the RACT analysis shall implement RACT as approved by NYSDEC. *See* 6 NYCRR § 212.10(c).
21. The New York State Title V Facility Permits Regulation applies to a “major facility.” *See* 6 NYCRR Part 201 (2005) (“Title V Facility Permit Regulation”).
22. The owner or operator of a facility subject to the NY Title V Facility Permit Regulation shall obtain and maintain a “title V permit” for the facility. *See* 6 NYCRR Part 201.
23. The EPA-approved New York Title V Operating Permit Program contains the following definition:
 - “*major stationary source or major source or major facility*” means: “... a stationary source, source, or facility that is located in a nonattainment area or an attainment area of the State within the ozone transport region where the stationary source, source, or facility potential to emit equals or exceeds the emissions thresholds (in tpy) identified in clause (a), (b), (c), (d), or (e) of this subparagraph...
 - (a) for areas classified as marginal or moderate ozone nonattainment, any stationary source, source, or facility with the potential to emit ... 50 tpy or more of volatile organic compounds (VOC).” 6 NYCRR § 201-2.1(b)(21).

D. STIPULATED FACTS

24. Respondent operates a polystyrene foam sheet manufacturing operation located at 26 Republic Plaza in Middletown, New York 10940.
25. Respondent’s facility is located outside of the lower Orange County and New York City Metropolitan areas, as the NY SIP defines that term.

26. The Respondent's facility's potential to emit VOCs exceeds the major source threshold of 50 tons/yr.
27. Respondent's uncontrolled VOC emission rates from both Silos No. 3 and 13 are at least 3.0 pounds of VOCs per hour.
28. New York State Department of Environmental Conservation issued Respondent a Title V facility permit, Permit # 3-3309-00064/00013 ("Genpak Title V Permit").
29. The Genpak Title V Permit specifies that "...Silos No. 3 and No. 13 store white and black polystyrene fluff regrind material. Air emissions from both silos are captured and ducted to a thermal oxidizer to control VOC emissions." Genpak Title V Permit Condition 26.4.
30. The Genpak Title V Permit specifies that "...Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively." Genpak Title V Permit Condition 10.
31. The EPA inspected Respondent's facility on June 17, 2015 ("June EPA Inspection") and October 7, 2015 ("October EPA Inspection"). On each of these dates, Respondent granted the EPA access to Respondent's facility and Respondent's personnel were present to answer questions and provide requested records.
32. The EPA inspectors observed the process areas listed in the table below.

| Process | Description |
|----------------------|---|
| Extruders | Polystyrene pellets are introduced to an extruder and a nuclient (talc) is added. The mixture enters the extruder screw and melt zone and then isopentane or butane is injected as a blowing agent. A second extruder receives the mixture which is cooled at a constant pressure. After exiting the extruder, the mixture is stretched into foam sheets. |
| Intermediate Storage | Rolled sheets of foam are stored in the Roll Storage Room for curing. |
| Thermoforming | Rolled polystyrene sheets are fed to a thermoformer, where they are reheated and then shaped into final product. Scrap polystyrene foam that is cut from the final product drops into a regrinder that is then fed to a scrap regrind silo for storage |
| Repelletizers | Polystyrene scrap regrind material is fed into repelletizers that heat and extrude the material into pellets that are eventually reintroduced into the front end of the process. |
| Scrap Storage Silos | Scrap regrind material is stored in large silos prior to being fed to the repelletizers. |

33. During the June EPA Inspection, the EPA discovered that the connection point between the repelletizer and Silo No. 3 was not closed. The EPA inspectors discovered this through infrared imaging of the area, which showed VOC emissions emanating from the connection point into the facility production building. Respondent routes general building air through the production building's ventilation system and vents it directly to the atmosphere without controls.

34. During the October EPA Inspection, the EPA measured VOC readings above background concentration with a photoionization detector ("PID") at the base of both Silos No. 3 and No. 13. At Silo No. 3, the EPA measured VOC readings over 65 parts per million ("ppm") with the PID outside the silo shell near the air intake vent at the base of the silo. At Silo No. 13, the EPA measured VOC readings over 80 ppm with the PID outside the

silo shell near the air intake vent at the base of the silo. The EPA measured VOC background concentration readings of approximately 0.035 ppm with the PID prior to entering Respondent's facility.

35. On October 19, 2015, Respondent submitted information to the EPA in response to requests the EPA made at its inspection. During the October EPA Inspection, the EPA requested Respondent investigate possible sources of VOC emissions the PID measured at Silos No. 3 and No. 13. As part of the response, Respondent explained that Silo No. 3 was "experiencing occasional back pressure at the pelletizer cyclone receiver. This is due to some piping constriction on the inlet side of the cyclone." Respondent explained that for Silo No. 13, the "[a]ccess port midway down the side of the cone was missing some screws."

36. By October 11, 2016, Respondent completed the following conditions:

- a. Respondent's contractor inspected areas the EPA had identified as VOC emissions leaks on Silos No. 3 and No. 13. Based on this inspection, the apparent sources of the leaks were: (i) dry rotted gasket at flange near pipe rack serving west side of silo No. 3; and (ii) deteriorated caulk at elbow joints for north side pipe elbows near silo No. 13. Respondent had these two areas cleaned and re-caulked during October 2015.
- b. During the October EPA Inspection, the EPA requested that Respondent check the areas at the base of silos No. 3, No. 13 and No. 16 for sources of possible VOC leaks (gaskets, flanges, fittings, etc.). Respondent had those silos checked on October 9, 2015. Respondent made the following observations and corrections:

- i. Silo No. 3: Piping constriction on the inlet side of the cyclone caused occasional back pressure at the pelletizer cyclone receiver. To prevent constriction caused by the flexible hose and eliminate the back pressure issue, a rigid inlet adapter with a larger sweep (radius) was fabricated and installed in fall 2015;
 - ii. Silo No. 13: The access port midway down the side of the cone was missing some screws; only one was in place. During October 2015, screws were reinstalled and silicone was applied to the perimeter to prevent leakage;
 - iii. Silo No. 16: Respondent discovered a hole in the upper section of the silo on the northwest side. Respondent plugged the hole temporarily and sealed it with a silicone sealant. Subsequently, Respondent secured a patch over the hole.
- c. Delivery of fluff to silos No. 3 and No. 13: On July 26, 2016, Respondent had a contractor inspect the fluff lines running across the roof of the production building and up to silos No. 3 and No. 13, as well as the off gas lines feeding the oxidizer. That inspection identified the need for: (1) some flanged joint and elbow repairs, and (2) sanding the exterior galvanized lines and then painting/coating the lines with a high zinc product to halt corrosion. All repairs identified by the inspection as necessary have been made to the flanged joints and elbows. The sanding and painting/coating of the lines identified by the inspection as necessary has been completed.
- d. Delivery of fluff from silos No. 3 and No. 13 to the repelletizing extruders:

- i. Instead of having one manifold for each extruder (*i.e.*, two manifolds), the plant now has a single manifold feeding both lines. The change from two manifolds to one was made at the end of August 2016.
 - ii. In early October 2016, a cable was installed on the cap for that manifold. Accordingly, when the cap is taken off periodically, it cannot fall to the ground. The cap can easily be put back on the manifold.
 - iii. Respondent installed new, specially designed and fabricated pelletizer doors on October 7, 2016.
 - iv. Respondent replaced the piping runs from each silo to the exterior of the fluff manifold in September 2016.
 - v. During the week of June 29, 2015, Respondent trained employees about (1) the importance of putting the cap back on the manifold after the cap has been removed; and (2) closing the door on the vent. A standard operating procedure now requires that such training be given to any employee whose duties will include removing that cap or using the door for the vent.
- e. Dust bags: Respondent developed a schedule for periodic cleaning and inspection of the dust bags, and replacement as necessary.

E. ALLEGED VIOLATIONS OF LAW

37. Respondent is a “person” within the meaning of the NY General Provisions.
38. Respondent is subject to 6 NYCRR § 212.10(c) for reasonably available control technology, and Genpak Title V Permit Condition 26.4.
39. Respondent is subject to 6 NYCRR § 200.7, and Genpak Title V Permit Condition 10.

40. Respondent has allowed VOC emissions from Silos No. 3 and No. 13 to vent directly to the atmosphere without being captured and ducted to the required thermal oxidizer, in violation of 6 NYCRR § 212-3.1; which was formerly 6 NYCRR § 212.10. and Genpak Title V Permit Condition 26.4.
41. Respondent has operated equipment associated with an emission control device in a state of disrepair such that the control device did not operate effectively to control all VOC emissions from Silos No. 3 and No. 13 in violation of 6 NYCRR § 200.7 and Genpak Title V Facility Permit Condition 10.

F. TERMS OF CONSENT AGREEMENT

42. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:
- a. admits that the EPA has jurisdiction over the subject matter alleged in this Agreement;
 - b. admits the stipulated facts stated above;
 - c. consents to the assessment of a civil penalty as stated below;
 - d. consents to the issuance of the attached Final Order;
 - e. waives any right to contest the alleged violations of law set forth in Section E of this Consent Agreement;
 - f. waives its rights to appeal the Order accompanying this Agreement; and
 - g. Neither admits nor denies the EPA Conclusions of Law set forth above.
43. For the purpose of this proceeding, Respondent:
- a. agrees that this Agreement states a claim upon which relief may be granted against Respondent;

- b. acknowledges that this Agreement constitutes an enforcement action for purposes of considering Respondent's compliance history in any subsequent enforcement actions;
- c. waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this Order, including any right of judicial review under Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1);
- d. consents to personal jurisdiction in any action to enforce this Agreement or Order, or both, in the United States District Court for the Southern District of New York; and
- e. waives any rights it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to compel compliance with the Agreement or Order, or both, and to seek an additional penalty for such noncompliance, and agrees that federal law shall govern in any such civil action.

44. Penalty Payment. Respondent agrees to:

- a. pay the civil penalty in the total amount of \$15,000 ("EPA Penalty") within 30 calendar days of the Effective Date of this Agreement.
- b. pay the EPA Penalty using any method, or combination of methods, provided on the website: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>, and identifying each and every payment with "Docket No. CAA-02-2017-1201." Promptly after payment of the EPA Penalty, send proof of payment to Mr. Robert Buettner, Chief, Air Compliance Branch, EPA Region 2,

290 Broadway, New York, NY 10007 and Buettner.robert@epa.gov (“proof of payment” means, as applicable, a copy of the check, confirmation of credit card or debit card payment, confirmation of wire or automated clearinghouse transfer, and any other information reasonably required to demonstrate that payment has been made according to the EPA requirements, in the amount due, and identified with “Docket No. CAA-02-2017-1201”).

45. If Respondent fails to timely pay any portion of the penalty assessed under this Agreement, the EPA may:

- a. request the Attorney General bring a civil action in an appropriate district court to recover: the amount assessed; interest at rates established pursuant to 26 U.S.C. § 6621(a)(2); the United States’ enforcement expenses; and a 10 percent quarterly nonpayment penalty, 42 U.S.C. § 7413(d)(5);
- b. refer the debt to a credit reporting agency or a collection agency, 42 U.S.C. § 7413(d)(5), 40 C.F.R. §§ 13.13, 13.14, and 13.33;
- c. collect the debt by administrative offset (i.e., the withholding of money payable by the United States to, or held by the United States for, a person to satisfy the debt the person owes the Government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, 40 C.F.R. Part 13, Subparts C and H; and
- d. suspend or revoke Respondent’s licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, 40 C.F.R. § 13.17.

46. The provisions of this Agreement shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assigns.
47. By signing this Agreement, Respondent acknowledges that this Agreement and Order will be available to the public and agrees that this Agreement does not contain any confidential business information or personally identifiable information.
48. By signing this Agreement, the undersigned representative of Complainant and the undersigned representative of Respondent each certify that he or she is fully authorized to execute and enter into the terms and conditions of this Agreement and has the legal capacity to bind the party he or she represents to this Agreement.
49. By signing this Agreement, both parties agree that each party's obligations under this Consent Agreement and attached Final Order constitute sufficient consideration for the other party's obligations.
50. By signing this Agreement, Respondent certifies that the information it has supplied in (a) enclosures to correspondence from James Cunningham of Genpak to Hans Buening of EPA dated July 30, 2015; (b) Genpak's Responses to EPA's August 2, 2016 information requests from Hans Buening; (c) Genpak's Responses to EPA's October 7, 2015 follow up inspection; and (d) "GENPAK, LLC RESPONSE TO INFORMATION REQUESTED BY USEPA" (dated October 11, 2016), concerning this matter was at the time of submission true, accurate, and complete for each such submission, response, and statement. Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.

51. Except as qualified by Paragraph 45, each party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.

G. EFFECT OF CONSENT AGREEMENT AND ATTACHED FINAL ORDER

52. In accordance with 40 C.F.R. § 22.18(c), compliance with the terms of this Consent Agreement and Final Order resolves Respondent's liability for federal civil penalties for the violations and facts specifically identified, alleged or stipulated above, including those in paragraphs 42 and 43; it resolves no other liability.

53. Penalties paid pursuant to this Agreement shall not be deductible for purposes of federal taxes.

54. This Agreement constitutes the entire agreement and understanding of the parties and supersedes any prior agreements or understandings, whether written or oral, among the parties with respect to the subject matter hereof.

55. The terms, conditions, and compliance requirements of this Agreement may not be modified or amended except upon the written agreement of both parties, and approval of the Regional Judicial Officer.

56. Any violation of the attached Final Order may result in a civil judicial action for an injunction or civil penalties of up to \$95,284 per day per violation, or both, as provided in Section 113(b)(2) of the Act, 42 U.S.C. § 7413(b)(2), as well as criminal sanctions as provided in Section 113(c) of the Act, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this Order in an administrative, civil judicial, or criminal action.

57. Nothing in this Agreement shall relieve Respondent of the duty to comply with all applicable provisions of the Act and other federal, state, or local laws or statutes, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or

regulations, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit.

58. Nothing herein shall be construed to limit the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.

59. This CAFO and any provision herein shall not be construed as an admission in any civil action or other administrative proceeding, except in an action or proceeding to enforce or seek compliance with the provisions of this CAFO.

H. EFFECTIVE DATE

60. Respondent and Complainant agree to issuance of the attached Final Order. Promptly upon filing with the Hearing Clerk, the EPA will transmit a copy of the filed Consent Agreement to the Respondent by email and US Mail to the following:

Philip Leggett
Genpak LLC
68 Warren St.
Glens Falls, NY 12801
PLeggett@genpak.com

James Cunningham
Genpak LLC
26 Republic Plaza
Middletown, New York 10940
JCunningham@genpak.com


EPA will also send a copy by email and US Mail to the following:

Counsel for Respondent:

Sidley Austin LLP
c/o Maureen Crough
787 Seventh Avenue
New York, New York 10019
mcrough@sidley.com

61. This Consent Agreement and attached Final Order shall become effective after execution of the Final Order by the Regional Judicial Officer, on the date of filing with the Hearing Clerk.

For Respondent:



Philip Leggett
Corporate Engineering Mgr.
Genpak LLC
26 Republic Plaza
Middletown, New York 10940

Sept. 19, 2017

For Complainant:



Dore LaPosta, Director
Division of Enforcement and Compliance Assistance
United States Environmental Protection Agency, Region 2

Sept. 22, 2017

*In the Matter of Genpak LLC
CAA-02-2017-1201*

FINAL ORDER

The Regional Judicial Officer of EPA, Region 2, concurs in the foregoing Consent Agreement, *In the Matter of Genpak LLC*, CAA-02-2017-1201. This Consent Agreement, entered into by the parties, is hereby approved and issued, as a Final Order, effective immediately.

Helen Ferrara

Helen Ferrara
Regional Judicial Officer
United States Environmental Protection Agency, Region 2

Date: Sept 25, 2017

CERTIFICATE OF SERVICE

I certify that on 9/25, 2017, I caused the foregoing "Consent Agreement" and "Final Order," in the Matter of Genpak LLC, Docket No. CAA-02-2017-1201 to be filed and copies of the same to be mailed to the parties as indicated below.

One Original and One Copy, by hand delivery to:

Karen Maples
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

One Copy, by hand delivery to:

Anhthu Hoang
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866


Helen S. Ferrara
Regional Judicial Officer
U.S. Environmental Protection Agency
Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

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10/11/17

One Copy, by Certified Mail-Return Receipt Requested, Article Number _____ to:

Philip Leggett
Genpak LLC
68 Warren St.
Glens Falls, NY 12801

Dated: 9/25, 2017

Signature: 

Print Name: Anhthu Hoang

Title: Asst. Regional Counsel
U.S. Environmental Protection Agency
Office of Regional Counsel, Region 2

