



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

MAR 21 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ron Nuckles, General Manager
Jupiter Aluminum Corporation – Coilcoating Division
205 East Carey Street
Fairland, Indiana 46126

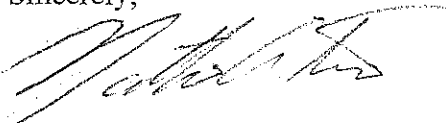
Dear Mr. Nuckles:

Enclosed is a file-stamped Consent Agreement and Final Order (CAFO) which resolves case docket number CAA-05-2014-0015. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on MAR 21 2014.

Pursuant to paragraph 47 of the CAFO, Jupiter must pay the first installment of the civil penalty within 30 days of the effective date of the CAFO, and the second installment of the civil penalty within 270 days of the effective date of the CAFO. The electronic funds transfer must display the docket number CAA-05-2014-0015.

Please direct any questions regarding this case to Mark Palermo, Associate Regional Counsel, (312) 866-6082.

Sincerely,

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

Enclosure

cc: Ann Coyle, Regional Judicial Officer/C-14J
Regional Hearing Clerk/E-19J
Mark Palermo/C-14J
Phil Perry, Indiana Department of Environmental Management

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:) Docket No. CAA-05-2014-0015
)
Jupiter Aluminum Corporation –)
Coilcoating Division) Proceeding to Assess a Civil Penalty
Fairland, Indiana) Under Section 113(d) of the Clean Air Act,
) 42 U.S.C. § 7413(d)
)
Respondent.)
_____)

RECEIVED
REGIONAL HEARING CLERK
U.S. EPA-REGION 5
2014 MAR 21 AM 10:40

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d), and Sections 22.1(a)(2), 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), as codified at 40 C.F.R. Part 22.
2. Complainant is the Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5.
3. Respondent is Jupiter Aluminum Corporation – Coilcoating Division (Jupiter), a corporation doing business in Indiana.
4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).
5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

7. For the purpose of this proceeding, Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations and alleged violations in this CAFO.

8. Respondent 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. The CAA establishes a regulatory scheme designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and productive capacity of its population. 42 U.S.C. § 7401(b)(1).

10. Section 112 of the CAA sets forth a national program for the control of Hazardous Air Pollutants (HAPs). 42 U.S.C. § 7412. As originally promulgated in the CAA Amendments of 1970, Section 112 directed EPA to publish a list of HAPs. HAP was defined as "an air pollutant to which no ambient air quality standard is applicable and which in the judgment of the Administrator may cause, or contribute to, an increase in mortality or an increase in serious, irreversible, or incapacitating reversible, illness." 42 U.S.C. § 1857c-7 (1971). At that time, Congress directed EPA to establish HAP standards that provided "an ample margin of safety to protect the public health from such hazardous air pollutant." *Id.*

11. Through the CAA Amendments of 1990, Congress replaced the then-existing Section 112 and established a new program for the control of HAPs. H.R. Rep. No. 101-490, 101st Cong., 2d Sess., pt 1 at 324 (1990). With the 1990 amendments, Congress itself established

a list of 188 HAPs believed to cause adverse health or environmental effects. 42 U.S.C. § 7412(b)(1).

12. Congress directed EPA to publish a list of all categories and subcategories of, *inter alia*, major sources of HAPs. 42 U.S.C. § 7412(c).

13. “Major source” was and is defined as any stationary source or group of stationary sources located with a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any HAP or 25 tons per year or more of any combination of HAPs. 42 U.S.C. § 7412(a)(1) and 40 C.F.R. § 63.2.

14. Congress directed EPA to promulgate regulations establishing emission standards for each category or subcategory of, *inter alia*, major sources of HAPs listed. 42 U.S.C. § 7412(d)(1). These emission standards must require the maximum degree of reduction in emissions of HAPs that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for the new or existing sources in the category or subcategory to which the emission standard applies. 42 U.S.C. § 7412(d)(2).

15. To the extent that it is not feasible to prescribe or enforce an emission standard for control of a HAP, Congress authorized EPA to promulgate “design, equipment, work practice, or operational” standards, which are to be treated as emission standards. 42 U.S.C. § 7412(d)(2).

16. The emission standards promulgated under Section 112 of the 1990 Amendments to the CAA, 42 U.S.C. § 7412, are known as the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories or MACT (maximum achievable control technology) standards. These emission standards are found in Part 63 of Title 40 of the Code of Federal Regulations.

17. Section 112(i)(3) of the CAA, 42 U.S.C. § 7412(i)(3), provides that after the effective date of any emission standard, limitation, or regulation promulgated pursuant to Section 112 of the CAA, no person may operate a source in violation of such standard, limitation, or regulation.

18. Pursuant to Section 112(c) of the CAA, 42 U.S.C. § 7412(c), on July 16, 1992, EPA identified metal coil coating (surface coating) as a source category of HAPs. 57 Fed. Reg. 31576.

19. Pursuant to Section 112(d) of the CAA, 42 U.S.C. § 7412(d), EPA promulgated the NESHAP for Surface Coating of Metal Coil at 40 C.F.R. Part 63, Subpart SSSS (Subpart SSSS).

20. Subpart SSSS applies to the owner or operator of any facility that performs metal coil surface coating and is a major source of HAPs.

21. Subpart SSSS at § 63.5130(a) provides that for an existing affected source, the compliance date is three years after June 10, 2002.

22. Subpart SSSS at 40 C.F.R. § 63.5120 establishes emission standards for limiting organic HAP emissions from metal coil coating affected sources. Under § 63.5120(a), the owner or operator must comply with one of three standards. Of relevance to this action is the standard under § 63.5120(a)(1), which provides that the owner or operator must limit HAP emissions to no more than two percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction). Subpart SSSS further provides at § 63.5120(b) that the owner or operator must demonstrate compliance with the standards by following the applicable procedures in § 63.5170.

23. Subpart SSSS at Table I of 40 C.F.R. § 63.5170 provides four options for compliance with the emission standards set forth under § 63.5120(a). The compliance option of relevance to this action is the third option, use of a capture system and control device. For affected sources using a capture system and control device, Table I of § 63.5170 and § 63.5170(c) provide for certain methods to demonstrate compliance with Subpart SSSS, including (of relevance to this action) that for each individual coil coating line, the owner or operator demonstrates that the overall organic HAP control efficiency is at least 98 percent during the initial performance test and that operating limits are achieved continuously thereafter.

24. Subpart SSSS at 40 C.F.R. § 63.5170(c)(2) provides that if the affected source uses oxidizers to limit organic HAP emissions to the level specified in § 63.5120(a)(1) or (2), the owner or operator must demonstrate compliance with § 63.5170(f). Section 63.5120(f) provides that if the owner or operator uses one or more oxidizers to control emissions from always-controlled work stations, the owner or operator must follow the procedures in either (f)(1) or (2) of this section. The compliance option of relevance to this action, § 63.5170(f)(1), provides that the owner or operator must demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters as specified under §§ 63.5170(f)(1)(i) through (xi). Section 63.5170(f)(1)(i) requires that, for each oxidizer used to comply with § 63.5120(a), the owner or operator must determine the oxidizer destruction or removal efficiency using the procedure in § 63.5160(d). Further, at § 63.5170(f)(1)(ii), whenever a work station is operated, the owner or operator must continuously monitor the oxidizer operating parameter established in accordance with § 63.5150(a)(3). Additionally, § 63.5170(f)(1)(xi) requires the owner or operator to compare actual performance to performance

required by the compliance option, specifying that the affected source is in compliance with § 63.5120(a) if, among other things, each oxidizer is operated such that the average operating parameter value is greater than the operating parameter established in § 63.5150(a)(3) for each three-hour period.

25. Subpart SSSS at 40 C.F.R. § 63.5160(d) provides that, with certain exceptions not applicable here, if the owner or operator is using an add-on control device, such as an oxidizer, to comply with the standard in § 63.5120, the owner or operator must conduct a performance test to establish the destruction or removal efficiency of the control device or the outlet HAP concentration achieved by the oxidizer.

26. Subpart SSSS at 40 C.F.R. § 63.5121 provides that, with certain exceptions not applicable here, for any coil coating line for which the owner or operator uses an add-on control device, the owner or operator must meet the applicable operating limits specified in Table I of Subpart SSSS, establish the operating limits during the performance test, and must meet these limits at all times after the limits are established. Of relevance to this action, Subpart SSSS provides that, for thermal oxidizer control devices, the average combustion temperature in any three-hour period must not fall below the combustion temperature limit established during the performance test according to procedures set forth under § 63.5160(d)(3)(i). *See* Table I of Subpart SSSS. Subpart SSSS further provides that the owner or operator must demonstrate continuous compliance with the operating limit as follows: (i) by collecting the combustion temperature data according to § 63.5150(a)(3); (ii) reducing the data to three-hour block averages; and (iii) maintaining the three-hour average combustion temperature at or above the temperature limit. *See Id.*

27. Subpart SSSS at 40 C.F.R. § 63.5150(a)(3) requires that if the owner or operator is complying with the emission standard in 40 C.F.R. § 63.5120 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter, the owner or operator must install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications and each temperature monitoring device must be equipped with a continuous recorder.

28. Subpart SSSS at 40 C.F.R. § 63.5150(a)(3)(i) requires the owner or operator to verify the calibration of the oxidizer temperature monitoring equipment (chart recorder, data logger or temperature indicator) every three months, or the equipment must be replaced.

29. Subpart SSSS at 40 C.F.R. § 63.5190(a)(2) requires the owner or operator to maintain records of all measurements needed to demonstrate compliance with Subpart SSSS, including control device operating parameter data in accordance with 40 C.F.R. § 63.5150(a)(3).

30. Section 502(d)(1) of the CAA, 42 U.S.C. § 7661a(d)(1), requires each state to develop and submit to EPA an operating permit program which meets the requirements of Title V.

31. EPA granted full approval to the Indiana Title V operating permit program on December 4, 2001 (66 Fed. Reg. 62969). The program became effective on November 30, 2001.

32. Section 502(b) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.

33. Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), authorizes the Administrator of EPA (the Administrator) to issue an administrative penalty order in accordance with Section 113(d) of the CAA, 42 U.S.C. § 7413(d), whenever, among other things, the

Administrator finds that any person has violated or is in violation of a requirement or prohibition of Section 112 of the CAA, any NESHAP promulgated under Section 112 of the CAA, Title V of the CAA, or any permit promulgated, issued, or approved under Title V of the CAA.

34. The Administrator may assess a civil penalty of up to \$37,500 per day of violation up to a total of \$295,000 for violations that occurred after January 12, 2009, through December 6, 2013, under Section 113(d)(1) of the CAA, 42 U.S.C. § 7413(d)(1), 40 C.F.R. Part 19, and 78 Fed. Reg. 66643 (Nov. 6, 2013).

35. Section 113(d)(1) limits the Administrator's authority to matters where the first alleged date of violation occurred no more than 12 months prior to initiation of the administrative action, except where the Administrator and the Attorney General of the United States jointly determine that a matter involving a longer period of violation is appropriate for an administrative penalty action.

36. The Administrator and the Attorney General of the United States, each through their respective delegates, have determined jointly that an administrative penalty action is appropriate for the period of violations alleged in this CAFO.

Complainant's Factual Allegations and Alleged Violations

37. Jupiter owns and operates an aluminum coil coating facility located at 205 East Carey Street, Fairland, Indiana (Jupiter Facility).

38. The Jupiter Facility is a facility that performs metal coil surface coating operations and is a major source of HAP.

39. At the Jupiter Facility, two coil coating lines, Line #1 and Line #2, constitute an existing affected source under Subpart SSSS and therefore are subject to the requirements of Subpart SSSS.

40. From May 22, 2007, until August 16, 2012, Jupiter operated under Part 70 (Title V) Operating Permit #T 145-21274-00013 issued by the Indiana Department of Environmental Management. A renewal permit was issued on August 16, 2012.

41. Section E.2.2 of Jupiter's Title V Operating Permit requires Jupiter to comply with specified provisions of Subpart SSSS for its two coil coating lines, which includes all of the Subpart SSSS provisions identified in this CAFO.

42. Jupiter uses two thermal oxidizers to comply with the Subpart SSSS emission standard under 40 C.F.R. § 63.5120(a)(1). Each of the two coil coating lines utilizes a separate thermal oxidizer for emission control and has associated combustion temperature monitoring equipment.

43. On August 4, 2008, a performance test of the thermal oxidizer servicing Line #1 demonstrated compliance with Subpart SSSS with an average combustion temperature of 1422°F as specified by 40 C.F.R. § 63.5160(d)(3). Based upon the 2008 performance test, 1422°F was the minimum three-hour average combustion temperature operating limit for the thermal oxidizer servicing Line #1 under 40 C.F.R. § 63.5121. On July 10, 2013, Jupiter conducted a new performance test that established a new minimum three-hour average combustion temperature limit of 1433°F based upon the results of the new performance test.

44. On November 21, 2007, a performance test of the thermal oxidizer servicing Line #2 demonstrated compliance with Subpart SSSS with an average combustion temperature of 1611°F as specified by 40 C.F.R. § 63.5160(d)(3). Based upon the 2007 performance test, 1611°F was the minimum three-hour average combustion temperature operating limit for the thermal oxidizer servicing Line #2 under 40 C.F.R. § 63.5121. On August 10, 2012, Jupiter

conducted a new performance test that established a new minimum three-hour average combustion limit of 1560°F based upon the results of the new performance test.

45. Jupiter has violated the Subpart SSSS with respect to operation of its two metal coil coating lines at the Jupiter Facility:

- A. Count 1 - Between August 30, 2010, and August 15, 2012, Jupiter failed to continuously maintain the three-hour average combustion temperature at or above the minimum combustion temperature operating limit established for the oxidizer servicing Line #1, in violation of Section 112 of the CAA, 42 U.S.C. § 7412, and its implementing regulations under 40 C.F.R. §§ 63.5121(a) and 63.5170, and Table 1 of 40 C.F.R. Part 63, Subpart SSSS, Section 502 of the CAA, 42 U.S.C. § 7661a, and its implementing regulations under 40 C.F.R. § 70.7(b), and Jupiter's Title V Permit.
- B. Count 2 - Between August 29, 2010, and August 10, 2012, Jupiter failed to continuously maintain the three-hour average combustion temperature at or above the minimum combustion temperature operating limit established for the oxidizer servicing Line #2, in violation of Section 112 of the CAA, 42 U.S.C. § 7412, and its implementing regulations under 40 C.F.R. §§ 63.5121(a) and 63.5170, and Table 1 of 40 C.F.R. Part 63, Subpart SSSS, Section 502 of the CAA, 42 U.S.C. § 7661a, and its implementing regulations under 40 C.F.R. § 70.7(b), and Jupiter's Title V Permit.
- C. Count 3 - Between August 29, 2010, and August 15, 2012, Jupiter failed to properly measure, calculate, and record the three-hour average combustion temperature for each of the oxidizers servicing Line #1 and Line #2 and compare the actual oxidizer performance to the required performance, in violation of Section 112 of the CAA, 42 U.S.C. § 7412, and its implementing regulations under 40 C.F.R. §§ 63.5170(f)(ix) and 63.5190(a)(2), and Table 1 of 40 C.F.R. Part 63, Subpart SSSS, Section 502 of the CAA, 42 U.S.C. § 7661a, and its implementing regulations under 40 C.F.R. § 70.7(b), and Jupiter's Title V Permit.
- D. Count 4 - Prior to December 20, 2012, Jupiter calibrated the combustion temperature monitoring devices associated with each of the oxidizers servicing Line #1 and Line #2 every four months instead of every three months, in violation of Section 112 of the CAA, 42 U.S.C. § 7412, and its implementing regulations under 40 C.F.R. § 63.5150(a)(3)(i), and Section 502 of the CAA, 42 U.S.C. § 7661a, and its implementing regulations under 40 C.F.R. § 70.7(b), and Jupiter's Title V Permit.

Civil Penalty

46. Based on analysis of the factors specified in Section 113(e) of the CAA, 42 U.S.C. § 7413(e), the facts of this case, Respondent’s cooperation and agreement to enter into a separate Administrative Order on Consent pursuant to Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), requiring a compliance program to ensure Respondent’s prompt return to compliance, Complainant has determined that an appropriate civil penalty to settle this action is \$140,394.

47. Respondent must pay the \$140,394 civil penalty in two installments with interest as follows:

<u>Installment</u>	<u>Due By</u>	<u>Payment</u>	<u>Principal</u>	<u>Interest (1%)</u>
Payment #1	Within 30 days of effective date of CAFO	\$70,197	\$70,197	\$0
Payment #2	Within 270 days of effective date of CAFO	\$70,664.98	\$70,197	\$467.98

Respondent must pay the installments by Automated Clearinghouse (ACH) electronic funds transfer, payable to “Treasurer, United States of America,” and sent to:

US Treasury REX/Cashlink ACH Receiver
ABA: 051036706
Account Number: 310006, Environmental Protection Agency
CTX Format Transaction Code 22-checking

In the comment area of the electronic funds transfer, state Respondent’s name and the docket number of this CAFO.

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

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

Mark J. Palermo (C-14J)
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Regional Hearing Clerk (E-19J)
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

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

50. If Respondent does not pay timely any installment payment as set forth in paragraph 47, above, the entire unpaid balance of the civil penalty and any amount required by paragraph 51, below, shall become due and owing upon written notice by EPA to Respondent of the delinquency. EPA may request the Attorney General of the United States to bring an action to collect any unpaid portion of the penalty with interest, nonpayment penalties and the United States enforcement expenses for the collection action under Section 113(d)(5) of the CAA, 42 U.S.C. § 7413(d)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

51. Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any overdue amount from the date payment was due at a rate established by the Secretary of the Treasury pursuant to 26 U.S.C. § 6621(a)(2). Respondent must pay the United States enforcement expenses, including but not limited to attorneys fees and costs

incurred by the United States for collection proceedings. In addition, Respondent must pay a quarterly nonpayment penalty each quarter during which the assessed penalty is overdue. This nonpayment penalty will be 10 percent of the aggregate amount of the outstanding penalties and nonpayment penalties accrued from the beginning of the quarter. 42 U.S.C. § 7413(d)(5).

General Provisions

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

53. The CAFO does not affect the rights of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violation of law.

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

55. Respondent certifies that, based on information and belief formed after reasonable inquiry, it is complying fully with 40 C.F.R. Part 63, Subpart SSSS and its Title V Permit.

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

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

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

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


60. Except as otherwise specified in this CAFO, Respondent reserves all of its rights, remedies, and defenses in any future proceeding.

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

**Consent Agreement and Final Order
In the Matter of Jupiter Aluminum Corporation – Coilcoating Division**

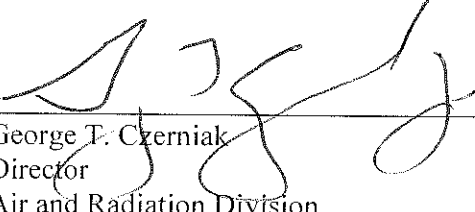
Jupiter Aluminum Corporation – Coilcoating Division, Respondent

February 28 2014
Date


Paul-Henri Chevalier
President
Jupiter Aluminum Corporation

United States Environmental Protection Agency, Complainant

3/11/14
Date


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


Consent Agreement and Final Order
In the Matter of: Jupiter Aluminum Corporation – Coilcoating Division
Docket No.

CAA-05-2014-0015

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

3/17/14
Date



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

**Consent Agreement and Final Order
In the Matter of: Jupiter Aluminum Corporation – Coilcoating Division
Docket No.**

CAA-05-2014-0015

Certificate of Service

I certify that I filed the original and one copy of the Consent Agreement and Final Order (CAFO), docket number CAA 05 2014 0015 with the Regional Hearing Clerk, and that I mailed the second original copy to Respondent by first-class, postage prepaid, certified mail, return receipt requested, by placing it in the custody of the United States Postal Service addressed as follows:

RECEIVED
REGIONAL HEARING CLERK
U.S. EPA-REGION 5
2014 MAR 21 PM 10:40

Mr. Ron Nuckles, General Manager
Jupiter Aluminum Corp. – Coilcoating Division
205 East Carey Street
Fairland, Indiana 46126

Mark Volkmann, EHS Director
Jupiter Aluminum Corp. – Coilcoating Division ~ 7009 1680 0000 7670 0580
1745 - 165th Street
Hammond, Indiana 46320

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

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

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

Mr. Phil Perry, Chief
Air Compliance and Enforcement Branch
Indiana Department of Environmental Management
100 N. Senate Ave. (Mail Code 61-53 IGCN 1003)
Indianapolis, IN 46204-2251

On the 21 day of March 2014.


Loretta Shaffer, Program Technician
PAS, AECAB

CERTIFIED MAIL RECEIPT NUMBER:

7009 1680 0000 7670 0573