

EPA ENFORCEMENT ACCOUNTS RECEIVABLE CONTROL NUMBER FORM FOR ADMINISTRATIVE ACTIONS

This form was originated by Wanda I. Santiago for

Maximilian Boal
Name of Case Attorney

6/30/15
Date

in the ORC (RAA) at 918-1113
Office & Mail Code Phone number

Case Docket Number EPCRA-01-2015-0055

Site-specific Superfund (SF) Acct. Number _____

This is an original debt: _____ This is a modification

Name and address of Person and/or Company/Municipality making the payment:

BWE, Inc., f/n/a Booth Watz Enterprises, Inc.
d/b/a G.H. Berlin-Windward
42 Rumsey Road
East Hartford, CT 06108

Total Dollar Amount of Receivable \$ 82,200 Due Date: 7/30/15

SEP due? Yes _____ No Date Due _____

Installment Method (if applicable)

INSTALLMENTS OF:

1st \$ _____ on _____
2nd \$ _____ on _____
3rd \$ _____ on _____
4th \$ _____ on _____
5th \$ _____ on _____

For RHC Tracking Purposes:

Copy of Check Received by RHC _____ Notice Sent to Finance _____

TO BE FILLED OUT BY LOCAL FINANCIAL MANAGEMENT OFFICE:

IFMS Accounts Receivable Control Number _____

If you have any questions call: _____
in the Financial Management Office

Phone Number



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

June 29, 2015



Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency - Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

BY HAND

Re: *In the Matter of BWE, Inc.*
Docket No. EPCRA-01-2015-0055

Dear Ms. Santiago:

Enclosed for filing in the above-referenced action, please find the original and one copy of a Consent Agreement and Final Order (CAFO) settling the matter referenced above pursuant to 40 C.F.R. § 22.18(b) and the certificate of service.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Maximilian Boal".

Maximilian Boal
Enforcement Counsel

Enclosure

cc: David B. Van Slyke, Esq.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND

RECEIVED

JUN 29 2015

EPA ORC
Office of Regional Hearing Clerk

IN THE MATTER OF)
)
)

BWE, Inc.)
f/n/a Booth Waltz Enterprises, Inc.)
d/b/a G.H. Berlin-Windward)
42 Rumsey Road)
East Hartford, CT 06108)

Respondent.)
)
)

Proceeding under Section 325(c) of the Emergency)
Planning and Community Right-to-Know Act,)
42 U.S.C. § 11045(c))
_____)

Docket No: EPCRA-01-2015-0055

**CONSENT AGREEMENT
AND FINAL ORDER**

Complainant, the United States Environmental Protection Agency, Region 1 (“EPA”) and Respondent BWE, Inc., formerly known as Booth Waltz Enterprises, Inc., d/b/a G.H. Berlin-Windward, enter into this Consent Agreement and Final Order (“CAFO”) by mutual consent. By this CAFO, Respondent agrees to pay a civil penalty for alleged violations of Sections 311 and 312(a) of the Emergency Planning and Community Right-to-Know Act of 1986 (“EPCRA”), 42 U.S.C. §§ 11021 and 11022(a).

This CAFO simultaneously commences and concludes the cause of action described herein, pursuant to 40 C.F.R. §§ 22.13(b) and 22.18(b) and Section 325(c) of EPCRA, 42 U.S.C. § 11045(c). Complainant and Respondent (the “Parties”) agree that settlement of this matter is in the public interest and that entry of this CAFO without further litigation is the most appropriate means of resolving this matter.

NOW THEREFORE, before any hearing or the taking of any testimony, without adjudication of any issue of fact or law, upon the record, and upon consent and agreement of the Parties, it is hereby ordered and adjudged as follows:

I. EPCRA Statutory and Regulatory Authority

1. Section 311 of EPCRA, 42 U.S.C. § 11021, and its implementing regulations at 40 C.F.R. §§ 370.10, 370.12, 370.20, and 370.30-370.33, require the owner or operator of a facility which is required by the Occupational Safety and Health Act (“OSHA”), and the hazard communication standards promulgated thereunder at 29 C.F.R. § 1910.1200(b)(1), to prepare or have available a material safety data sheet (“MSDS”) for at least one hazardous chemical, to submit to the state emergency response commission (“SERC”), community emergency coordinator for the local emergency planning committee (“LEPC”), and the local fire department with jurisdiction over the facility, a MSDS for each hazardous chemical present at the facility at any one time in an amount equal to or greater than 10,000 pounds and for each extremely hazardous chemical present at the facility in an amount equal to or greater than 500 pounds, or the threshold planning quantity, whichever is lower, or to submit a list of such chemicals. The owner or operator must submit the required MSDS or list within three months after the owner or operator is first required to have the MSDS available or after the hazardous chemical requiring an MSDS first becomes present at the facility in an amount exceeding the threshold level established in 40 C.F.R. § 370.10(a).

2. Under Section 312(a) of EPCRA, 42 U.S.C. § 11022(a), and 40 C.F.R. §§ 370.10, 370.12, 370.20, 370.40, 370.44, and 370.45, the owner or operator of any facility that is required to prepare or have available a MSDS for a hazardous chemical under OSHA and the hazard communication standards promulgated thereunder at 29 C.F.R. § 1910.1200(b)(1), must prepare

and submit an emergency and hazardous chemical inventory form (“Tier I” or “Tier II” form) to the LEPC, the SERC, and the local fire department with jurisdiction over the facility. Pursuant to 40 C.F.R. §§ 370.40 and 370.45, the Tier I or Tier II form must be submitted annually on or before March 1st of each year and is required to contain information with respect to the preceding calendar year. Facilities in New Hampshire must submit Tier II forms instead of Tier I forms.

3. Pursuant to Section 325(c) of EPCRA, 42 U.S.C. §11045(c), and 40 C.F.R. Part 19, EPA is authorized to assess a civil penalty of up to \$32,500 per day for each violation of EPCRA Section 312, 42 U.S.C. § 11022, occurring after March 15, 2004 through January 12, 2009, and \$37,500 per day for each violation occurring after January 12, 2009, and a civil penalty of up to \$16,000 per day for each violation of EPCRA Section 311, 42 U.S.C. § 11021, occurring after January 12, 2009.

II. General Allegations

4. Respondent is a corporation formed under the laws of the State of Connecticut and is “person” as that term is defined by Section 329(7) of EPCRA, 42 U.S.C. § 11049(7), and 40 C.F.R. § 370.66.

5. Respondent is the owner or operator of a “facility,” located at 1064 Goffs Falls Road, Manchester, NH 03103 (“the Facility”), as that term is defined by Section 329(4) of EPCRA, 42 U.S.C. § 11049(4), and 40 C.F.R. § 370.66.

6. On or about May 15, 2012, authorized representatives of EPA inspected one of Respondent’s facilities located in West Rutland, VT. The purpose of the inspection was to determine Respondent’s compliance with EPCRA reporting requirements.

7. As a result of the May 15, 2012 inspection, EPA conducted an investigation regarding Respondent's compliance with EPCRA at five of its facilities, including the Facility in Manchester, NH.

8. Beginning November 2011 when Respondent took over the existing Facility, and at all times relevant to the violations cited herein, Respondent stored at the Facility "hazardous chemicals" within the meaning of 29 C.F.R. § 1910.1200(c), Section 311(e) of EPCRA, 42 U.S.C. § 11021(e), and as defined under 40 C.F.R. § 370.66, in quantities that exceeded the minimum threshold level ("MTL") of 10,000 pounds set forth in 40 C.F.R. § 370.10(a)(2)(i), including:

- a. methanol and windshield washer fluid, which contains methanol;
- b. diesel fuel;
- c. engine lube oil; automatic transmission fluid; hydraulic lubricants; drive train lubricant; gear lubricant; grease;
- d. R134a refrigerant; and,
- e. antifreeze.

9. At all times relevant to the violations cited herein, Respondent was required, pursuant to OSHA and regulations promulgated thereunder, to prepare or have available at the Facility a MSDS for the hazardous chemicals identified in Paragraph 8.

II. EPCRA Violations

Count I:

10. Complainant re-alleges Paragraphs 1 through 9.

11. During the calendar year 2011, Respondent stored the hazardous chemicals listed in Paragraph 8 at the Facility in quantities that exceeded the MTL of 10,000 pounds set forth in 40 C.F.R. § 370.10(a)(2)(i).

12. Respondent was therefore subject to the reporting requirements of Section 312(a) of EPCRA, 42 U.S.C. § 11022(a), and 40 C.F.R. §§ 370.10, 370.20, 370.40 and 370.42 for calendar year 2011.

13. Pursuant to EPCRA § 312, on or before March 1 of 2012, Respondent was required to prepare and submit Tier II forms containing chemical information for calendar year 2011, to the SERC, LEPC and the local fire department with jurisdiction over the Facility.

14. Respondent failed to submit a Tier II form for the calendar year of 2011 to the SERC, LEPC and local fire department with jurisdiction over the Facility by March 1, 2012.

15. Respondent's failure to submit Tier II forms to all of the necessary authorities on or before the reporting deadline of March 1st of the subsequent year for calendar year 2011 constituted a violation of Section 312(a) of EPCRA, 42 U.S.C. § 11022(a), and 40 C.F.R. §§ 370.10, 370.20, 370.40 and 370.42.

16. Respondent is therefore subject to an assessment of penalties under Section 325(c)(1) of EPCRA, 42 U.S.C. § 11045(c)(1), and 40 C.F.R. Part 19.

Count II:

17. Complainant re-alleges Paragraphs 1 through 16.

18. During the calendar year 2012, Respondent stored the hazardous chemicals listed in Paragraph 8 at the Facility in quantities that exceeded the MTL of 10,000 pounds set forth in 40 C.F.R. § 370.10(a)(2)(i).

19. Respondent was therefore subject to the reporting requirements of Section 312(a) of EPCRA, 42 U.S.C. § 11022(a), and 40 C.F.R. §§ 370.10, 370.20, 370.40 and 370.42 for calendar year 2012.

20. Pursuant to EPCRA § 312, on or before March 1 of 2013, Respondent was required to prepare and submit Tier II forms containing chemical information for calendar year 2012, to the SERC, LEPC and the local fire department with jurisdiction over the Facility.

21. Respondent failed to submit a Tier II form for the calendar year of 2012 to the SERC, LEPC and local fire department with jurisdiction over the Facility by March 1, 2013.

22. Respondent's failure to submit Tier II forms to all of the necessary authorities on or before the reporting deadline of March 1st of the subsequent year for calendar year 2012 constituted a violation of Section 312(a) of EPCRA, 42 U.S.C. § 11022(a), and 40 C.F.R. §§ 370.10, 370.20, 370.40 and 370.42.

23. Respondent is therefore subject to an assessment of penalties under Section 325(c)(1) of EPCRA, 42 U.S.C. § 11045(c)(1), and 40 C.F.R. Part 19.

Count III:

24. Complainant re-alleges Paragraphs 1 through 23.

25. As described in Paragraph 8, Respondent stored methanol and windshield washing fluid at the Facility in quantities exceeding the MTL of 10,000 pounds beginning in November 2011.

26. As described in Paragraph 9, Respondent was required to prepare or have available an MSDS for methanol and windshield washing fluid, which are "hazardous chemicals."

27. Pursuant to Section 311(a) of EPCRA, 42 U.S.C. § 11021(a), and 40 C.F.R. §§ 370.12(a), 370.30(a), 370.31(b), 370.32(a), and 370.33(a), Respondent was required to submit MSDSs for methanol and windshield washing fluid or a list of chemicals including methanol and windshield washing fluid to the LEPC, the SERC, and the local fire department with jurisdiction over the Facility within ninety days of the quantities of methanol and windshield washing fluid exceeding the threshold planning quantities of 10,000 pounds.

28. Respondent failed to submit MSDSs for methanol and windshield washing fluid or a list of chemicals including methanol and windshield washing fluid to the LEPC, the SERC, and the local fire department with jurisdiction over the Facility within ninety days of the quantity of methanol and windshield washing fluid exceeding the threshold planning quantity of 10,000 pounds.

29. Respondent is therefore subject to an assessment of penalties under Section 325(c)(2) of EPCRA, 42 U.S.C. § 11045(c)(2).

Count IV:

30. Complainant re-alleges Paragraphs 1 through 29.

31. As described in Paragraph 8, Respondent stored diesel fuel at the Facility in quantities exceeding the MTL of 10,000 pounds beginning November 2011.

32. As described in Paragraph 9, Respondent was required to prepare or have available an MSDS for diesel fuel, which is a “hazardous chemical.”

33. Pursuant to Section 311(a) of EPCRA, 42 U.S.C. § 11021(a), and 40 C.F.R. §§ 370.12(a), 370.30(a), 370.31(b), 370.32(a), and 370.33(a), Respondent was required to submit an MSDS for diesel fuel or a list of chemicals including and diesel fuel to the LEPC, the SERC,

and the local fire department with jurisdiction over the Facility within ninety days of the quantity of diesel fuel exceeding the threshold planning quantity of 10,000 pounds.

34. Respondent failed to submit an MSDS for diesel fuel or a list of chemicals including diesel fuel to the LEPC, the SERC, and the local fire department with jurisdiction over the Facility within ninety days of the quantity of diesel fuel exceeding the threshold planning quantity of 10,000 pounds.

35. Respondent is therefore subject to an assessment of penalties under Section 325(c)(2) of EPCRA, 42 U.S.C. § 11045(c)(2).

Count V:

36. Complainant re-alleges Paragraphs 1 through 35.

37. As described in Paragraph 8, Respondent stored engine lube oil, automatic transmission fluid, hydraulic lubricants, drive train lubricant, gear lubricant, and grease at the Facility in quantities exceeding the MTL of 10,000 pounds beginning November 2011.

38. As described in Paragraph 9, Respondent was required to prepare or have available an MSDS for engine lube oil, automatic transmission fluid, hydraulic lubricants, drive train lubricant, gear lubricant, and grease, which are “hazardous chemicals.”

39. Pursuant to Section 311(a) of EPCRA, 42 U.S.C. § 11021(a), and 40 C.F.R. §§ 370.12(a), 370.30(a), 370.31(b), 370.32(a), and 370.33(a), Respondent was required to submit an MSDS for engine lube oil, automatic transmission fluid, hydraulic lubricants, drive train lubricant, gear lubricant, and grease or a list of chemicals including these chemicals to the LEPC, the SERC, and the local fire department with jurisdiction over the Facility within ninety days of these chemicals exceeding the threshold planning quantities of 10,000 pounds.

40. Respondent failed to submit an MSDS for engine lube oil, automatic transmission fluid, hydraulic lubricants, drive train lubricant, gear lubricant, and grease or a list of chemicals including these chemicals to the LEPC, the SERC, and the local fire department with jurisdiction over the Facility within ninety days of the quantity of engine lube oil, automatic transmission fluid, hydraulic lubricants, drive train lubricant, gear lubricant, and grease exceeding the threshold planning quantity of 10,000 pounds.

41. Respondent is therefore subject to an assessment of penalties under Section 325(c)(2) of EPCRA, 42 U.S.C. § 11045(c)(2).

Count VI:

42. Complainant re-alleges Paragraphs 1 through 41.

43. As described in Paragraph 8, Respondent stored R134a refrigerant at the Facility in a quantity exceeding the MTL of 10,000 pounds beginning November 2011.

44. As described in Paragraph 9, Respondent was required to prepare or have available an MSDS for R134a refrigerant, which is a “hazardous chemical.”

45. Pursuant to Section 311(a) of EPCRA, 42 U.S.C. § 11021(a), and 40 C.F.R. §§ 370.12(a), 370.30(a), 370.31(b), 370.32(a), and 370.33(a), Respondent was required to submit an MSDS for R134a refrigerant or a list of chemicals including R134a refrigerant to the LEPC, the SERC, and the local fire department with jurisdiction over the Facility within ninety days of the quantity of R134a refrigerant exceeding the threshold planning quantity of 10,000 pounds.

46. Respondent failed to submit an MSDS for R134a refrigerant or a list of chemicals including R134a refrigerant to the LEPC, the SERC, and the local fire department with jurisdiction over the Facility within ninety days of the quantity of R134a refrigerant exceeding the threshold planning quantity of 10,000 pounds.

47. Respondent is therefore subject to an assessment of penalties under Section 325(c)(2) of EPCRA, 42 U.S.C. § 11045(c)(2).

Count VII:

48. Complainant re-alleges Paragraphs 1 through 47.

49. As described in Paragraph 8, Respondent stored antifreeze at the Facility in a quantity exceeding the MTL of 10,000 pounds beginning November 2011.

50. As described in Paragraph 9, Respondent was required to prepare or have available an MSDS for antifreeze, which is a “hazardous chemical.”

51. Pursuant to Section 311(a) of EPCRA, 42 U.S.C. § 11021(a), and 40 C.F.R. §§ 370.12(a), 370.30(a), 370.31(b), 370.32(a), and 370.33(a), Respondent was required to submit an MSDS for antifreeze or a list of chemicals including antifreeze to the LEPC, the SERC, and the local fire department with jurisdiction over the Facility within ninety days of the quantity of antifreeze exceeding the threshold planning quantity of 10,000 pounds.

52. Respondent failed to submit an MSDS for antifreeze or a list of chemicals including antifreeze to the LEPC, the SERC, and the local fire department with jurisdiction over the Facility within ninety days of the quantity of antifreeze exceeding the threshold planning quantity of 10,000 pounds.

53. Respondent is therefore subject to an assessment of penalties under Section 325(c)(2) of EPCRA, 42 U.S.C. § 11045(c)(2).

IV. Terms of Settlement

54. Respondent certifies that it has corrected the alleged violations cited in this CAFO and that it is now operating the Facility in compliance with Sections 311 and 312(a) of EPCRA and the regulations promulgated thereunder.

55. Respondent certifies that it is now operating the following additional facilities in compliance with Sections 311 and 312(a) of EPCRA and the regulations promulgated thereunder: (a) 431 Shelton Avenue, West Rutland, VT 05777; (b) 605 County Road, Westbrook, ME 04104; (c) 110A Mecaw Road, Hampden, ME 04401; and (d) 56 Howe Street, Rutland, VT 05701.

56. Respondent stipulates that EPA has jurisdiction over the subject matter alleged herein and that the allegations in this CAFO state a claim upon which relief can be granted. Respondent hereby waives any defenses it might have as to jurisdiction and venue.

57. Respondent waives its right to a judicial or administrative hearing or appeal on any issue of law or fact set forth herein and waives its right to appeal the Final Order accompanying this Consent Agreement.

58. Without admitting or denying the allegations herein, Respondent consents to the terms and issuance of this CAFO and agrees to the payment of a civil penalty for the purpose of settlement of this action.

59. This CAFO shall apply to and be binding upon Respondent and its officers, directors, agents, successors and assigns.

60. Pursuant to Section 325(c)(1) of EPCRA, 42 U.S.C. § 11045(c)(1), and in light of the nature of the violations and other relevant factors, Complainant has determined an appropriate civil penalty to settle this action is eighty-two thousand two hundred dollars (\$82,200).

61. Within thirty (30) days of the effective date of the Final Order, Respondent shall make payment in the amount of \$82,200 by cashier's or certified check, payable to "Treasurer,

United States of America,” with the title and docket number of the action (“*In the Matter of BWE, Inc., Docket No. EPCRA-01-2015-0055*”) noted on the check.

62. The check shall be mailed via regular U.S. Postal Service mail to:

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

63. Respondent shall simultaneously submit notice of payment of the civil penalty and copies of the check to:

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100 (Mail Code: ORA18-1)
Boston, MA 02109-3912

and

Maximilian Boal
Enforcement Counsel
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100 (Mail Code: OES04-2)
Boston, MA 02109-3912

64. Nothing in this agreement shall be construed as prohibiting, altering or in any way limiting the ability of EPA to seek any other remedies or sanctions available by virtue of Respondent’s violation of this agreement or of the statutes and regulations upon which this agreement is based.

65. Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. In the event that any partial payment of the civil penalty, plus interest thereon, is not paid when due without demand, the penalty plus accrued interest shall be payable with

additional interest from the original due date to the date of payment, at the rate of the United States Treasury tax and loan rate in accordance with 31 C.F.R. § 901.9(b)(2). In addition, a penalty charge of six (6) percent per year compounded annually will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. Any such non-payment penalty charge on the debt will accrue from the date the penalty payment becomes due and is not paid. See 31 C.F.R. § 901.9(d). In any collection action, the validity, amount, and appropriateness of the penalty shall not be subject to review.

66. All penalties, interest, and charges payable pursuant to this CAFO shall represent civil penalties assessed by EPA and shall not be deductible for purposes of federal taxes. Respondent further agrees not to use these payments in any way as, or in furtherance of, a tax deduction under federal, state or local law.

67. The terms of this CAFO constitute a full settlement by EPA of all claims for civil penalties for the violations alleged in this CAFO. Compliance with this CAFO shall not be a defense to any other actions subsequently commenced pursuant to federal laws and regulations administered by EPA for matters not addressed in this CAFO, including without limitation any claims for civil penalties pertaining to Respondent's facilities listed in paragraph 55, and it is the responsibility of Respondent to comply with all applicable provisions of federal, state, and local law. Nothing in this CAFO is intended to nor shall be construed to operate in any way to resolve any criminal liability of Respondent. Nothing in the CAFO shall be construed to limit the authority of the United States to undertake any action against Respondent in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment. This CAFO does not operate as a waiver of any defenses in


governmental or third party actions against the Respondent for matters not addressed in this CAFO.

68. Respondent shall bear its costs in connection with the action resolved by this CAFO, including attorney's fees. Respondent specifically waives any right to recover such costs from the Complainant pursuant to the Equal Access for Justice Act, 5 U.S.C. § 504, or other applicable laws.

69. Each undersigned representative of the parties to this CAFO certifies that he or she is fully authorized by the party represented to enter into the terms and conditions of this CAFO and to execute and legally bind that party to it.

70. In accordance with 40 C.F.R. § 22.31(b), the effective date of this CAFO shall be the date on which it is filed with the Regional Hearing Clerk.


For Respondent BWE, Inc.



Print Name: STEPHEN E. DODD
Title: PRESIDENT

Date: 6/18/15

For Complainant U.S. EPA, Region 1




Joanna Jerison, Legal Enforcement Manager
Office of Environmental Stewardship
U.S. EPA, Region 1

Date: 6/26/15

V. FINAL ORDER

The foregoing Consent Agreement is hereby approved and incorporated by reference into this Order. The Respondent is hereby ordered to comply with the terms of the above Consent Agreement, which will become effective on the date it is filed with the Regional Hearing Clerk.

Date: 6/29/15



LeAnn Jensen
Acting Regional Judicial Officer
U.S. EPA, Region 1

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

IN THE MATTER OF)	
)	
)	
BWE, Inc.)	
f/n/a Booth Waltz Enterprises, Inc.)	Docket No: EPCRA-01-2015-0055
d/b/a G.H. Berlin-Windward)	
42 Rumsey Road)	
East Hartford, CT 06108)	
)	
Respondent.)	
)	
)	
)	

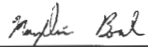
CERTIFICATE OF SERVICE

I hereby certify that the foregoing Consent Agreement and Final Order has been sent to the following persons on the date noted below:

Original and One Copy, Hand Delivered:	Wanda Santiago Regional Hearing Clerk U.S. Environmental Protection Agency, Region 1 5 Post Office Square, Suite 100, Mail Code: ORA 18-1 Boston, MA 02109-3912
---	---

Copy, Certified Mail, Return Return Receipt Requested:	David B. Van Slyke, Esq. Preti Flaherty Beliveau & Pachios LLP One City Center PO Box 9546 Portland, ME 04112
---	---

Dated: 6-29-2015



Maximilian Boal
Enforcement Counsel (OES)
U.S. Environment Protection Agency, Region 1
5 Post Office Square, Suite 100, Mail Code: OES04-2
Boston, MA 02109-3912