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BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

REGIONAL HEARING CLERK
EPA REGION III, PHILA. PA

In the Matter of:	:	
	:	
Simpson Strong-Tie Company, Inc.	:	
5956 W. Las Positas Boulevard	:	Docket No. RCRA-03-2014-0072
Pleasanton, CA 94588	:	
	:	
Respondent	:	
	:	
Simpson Strong-Tie Company, Inc.	:	Proceeding under Section 3008(a) and
3100 Falls Cliff Road	:	(g) of the Resource Conservation and
Baltimore, MD 21211	:	Recovery Act, as amended, 42 U.S.C.
	:	Section 6928(a) and (g)
	:	
Facility	:	
	:	

CONSENT AGREEMENT

I. PRELIMINARY STATEMENT

1. This Consent Agreement is entered into by the Director, Land and Chemicals Division, U.S. Environmental Protection Agency, Region III ("Complainant") and Simpson Strong-Tie Company, Inc. ("Respondent") pursuant to Section 3008(a) of the Solid Waste Disposal Act, commonly known as the Resource Conservation and Recovery Act ("RCRA") of 1976, as amended by *inter alia*, the Hazardous and Solid Waste Amendments ("HSWA") of 1984 (collectively referred to hereinafter as "RCRA"), 42 U.S.C. § 6928(a), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, and the Revocation/Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22, including, specifically, 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3).

2. The Consolidated Rules of Practice, at 40 C.F.R. § 22.13(b), provide, in pertinent part, that where the parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding simultaneously may be commenced and concluded by the issuance of a consent agreement and final order pursuant to 40 C.F.R. § 22.18(b)(2) and (3). Pursuant thereto, this Consent Agreement ("CA") and the accompanying Final Order ("FO") (collectively referred to herein as the "CAFO"), simultaneously commence and conclude this administrative proceeding against Respondent.

3. The State of Maryland has received federal authorization to administer a Hazardous Waste Management Program (the State of Maryland Hazardous Waste Management Regulations) *in lieu* of the federal hazardous waste management program established under RCRA Subtitle C, 42 U.S.C. §§ 6921-6939i. The State of Maryland Hazardous Waste Management Regulations (“MdHWMR”) were originally authorized by EPA on February 11, 1985, pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b). Revisions to the MdHWMR set forth at COMAR, Title 26, Subtitle 13 were authorized by EPA effective July 31, 2001 and September 24, 2004. The provisions of the revised authorized program are enforceable by EPA pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a).
4. Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), authorizes EPA to initiate an enforcement action whenever it is determined that a person is in violation of any requirement of RCRA Subtitle C, EPA’s regulations thereunder, or any regulation of a state hazardous waste program which has been authorized by EPA. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes the assessment of a civil penalty against any person who violates any requirement of Subtitle C of RCRA.
5. This CA and the accompanying FO address alleged violations by Respondent of Subtitle C of RCRA, 42 U.S.C. §§ 6921- 6939i, the federal hazardous waste regulations set forth at 40 C.F.R. Parts 260-266, 268 and 270-273, and the MdHWMR, set forth at the Code of Maryland Regulations (“COMAR”), Title 26, Subtitle 13 *et seq.*, in connection with Respondent’s facility located at 3100 Falls Cliff Road, Baltimore, Maryland 21211 (the “Facility”). Factual allegations or legal conclusions in this CA that are based on provisions of federally-authorized MdHWMR requirements cite those respective provisions as the authority for such allegations or conclusions.
6. On April 1, 2013, EPA sent a letter to the State of Maryland, through the Maryland Department of the Environment (“MDE”), providing prior notice of the initiation of this action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

II. GENERAL PROVISIONS

7. Respondent admits the jurisdictional allegations set forth in this CAFO.
8. Respondent neither admits nor denies the specific factual allegations and conclusions of law set forth in this CA, except as provided in Paragraph 7, above.
9. Respondent agrees not to contest EPA’s jurisdiction with respect to the execution of this CA, issuance of the attached FO, or the enforcement of the CAFO.
10. For purposes of this proceeding only, Respondent hereby expressly waives its right to contest the allegations set forth in this CA and any right to appeal the accompanying FO.

11. Respondent consents to the issuance of this CAFO and agrees to comply with its terms and conditions.
12. Respondent shall bear its own costs and attorney's fees in connection with this proceeding.

III. FINDINGS OF FACT AND CONCLUSIONS OF LAW

13. In accordance with the Consolidated Rules of Practice, at 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3), Complainant alleges the findings of fact and conclusions of law as set forth below.
14. The United States Environmental Protection Agency's Office of Administrative Law Judges has jurisdiction over this matter pursuant to RCRA Section 3008(a) and (g), 42 U.S.C. § 6928(a) and (g), and 40 C.F.R. § 22.1(a)(4) and .4(c).
15. Respondent, Simpson Strong-Tie Company, Inc., is a California corporation and a "person" as defined by RCRA Section 1004(15), 42 U.S.C. § 6903(15), and COMAR 26.13.01.03B.
16. Respondent produces epoxy-based products, including coatings, adhesives and sealants, grout and cement products through blending sand, cement and other additives in a closed mixing process, and fiberglass molds at its facility located 3100 Falls Cliff Road in Baltimore, Maryland ("Facility").
17. Respondent became the "operator" of the Facility on December 1, 2011, through an asset acquisition agreement, and at all times relevant to the allegations set forth in this CAFO, Respondent has been the "operator" of the Facility as that term is defined by COMAR 26.13.01.03B.
18. At all times relevant to the allegations set forth in this CAFO, Respondent has been a "generator" of, and has engaged in the "storage" of, materials, described herein, that are "solid wastes" and "hazardous wastes" at the Facility, as those terms are defined by COMAR 26.13.01.03B.
19. On April 19, 2012, EPA representatives conducted a Compliance Evaluation Inspection ("Inspection") of the Facility to examine Respondent's compliance with the federally-authorized MdHWMR requirements at the Facility.

COUNT I

(Operating a Treatment, Storage or Disposal Facility without a Permit or Interim Status)

20. The allegations of Paragraphs 1 through 19 of the CAFO are incorporated herein by

reference as though fully set forth at length.

21. Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e), and COMAR 26.13.07.01A, provide, with certain exceptions not relevant to the violations alleged herein, that a person may not operate a hazardous waste treatment, storage or disposal facility (“TSDF”) unless such person has first obtained a permit or interim status for the facility.
22. Respondent has never had “interim status” pursuant to RCRA Section 3005(e) or COMAR 26.13.06, or a permit issued pursuant to RCRA Section 3005(a) or COMAR 26.13.07, for the treatment, storage, or disposal of hazardous waste at the Facility.
23. Respondent stored D001 and D002 hazardous wastes in containers in the flammable storage room of its warehouse for more than 90 days. These hazardous wastes were shipped to Cycle Chem Inc. on September 9, 2012 (manifest number 006955265JJK) and December 4, 2012 (manifest number 006955495JJK).
24. At the time of the Inspection, Respondent was treating, storing and/or disposing of spent acetone and spent dibasic ester, which were D001 hazardous wastes, contained in rags in metal trash cans at the Facility.
25. At the time of the Inspection, Respondent was treating, storing and/or disposing of spent acetone, which was a D001 hazardous waste, contained in four open 5-gallon buckets inside a metal flammable storage cabinet at the Facility.
26. Pursuant to COMAR 26.13.03.05E(1), a generator may accumulate hazardous waste on-site without a permit or interim status for 90 days or less provided the hazardous waste is stored in accordance with a number of conditions set forth in that section, including, *inter alia*:
 - a. Pursuant to COMAR 26.13.03.05E(1)(b), the generator must accumulate the waste in containers, tanks, or certain drip pads;
 - b. Pursuant to COMAR 26.13.03.05E(1)(d), the generator must accumulate the hazardous waste in containers in accordance with COMAR 26.13.05.09, which requires, *inter alia*, that containers must be closed during storage of hazardous waste except when it is necessary to add or remove waste (COMAR 26.13.05.09D), and that inspections of areas where containers of hazardous waste are stored must be performed at least weekly (COMAR 26.13.05.09E);
 - c. Pursuant to COMAR 26.13.03.05E(1)(e), the date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container of hazardous waste; and

- d. Pursuant to COMAR 26.13.03.05E(1)(f)(ii), each container must be, *inter alia*, labeled or marked clearly with the words "Hazardous Waste" while being accumulated on-site.
27. At the time of the Inspection, the containers (i.e., metal trash cans and buckets) of hazardous waste referred to above were not labeled and dated as described in COMAR 26.13.03.05E(1)(e) and (f)(ii) and the buckets of hazardous waste referred to in Paragraph 25 were not kept closed except when necessary to add or remove waste, as described in COMAR 26.13.03.09D, which is incorporated by reference into COMAR 26.13.05E(1)(d). Accordingly, such containers of hazardous waste were not exempt from permitting requirements under COMAR 26.13.07.01A.
28. The containers of hazardous waste referred to in Paragraph 23, above, were stored for greater than 90 days at the Facility. Accordingly, such containers were not exempt from the permitting requirements under COMAR 26.13.07.01A.
29. Respondent operated a hazardous waste treatment, storage and disposal facility without a permit or interim status, in violation of the requirements set forth in Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e), and COMAR 26.13.07.01A.

COUNT II

(Failure to Make Hazardous Waste Determinations)

30. The allegations of Paragraphs 1 through 29 of the CAFO are incorporated herein by reference as though fully set forth at length.
31. Pursuant to COMAR 26.13.03.02A, generators of solid waste, as defined in COMAR 26.13.02.02, must determine if such waste is a hazardous waste using one or more of the methods set forth in COMAR 26.13.03.02A.
32. Respondent generated the solid wastes identified in Paragraphs 23 through 25, above, but failed to make a hazardous waste determination for such wastes, as required by COMAR 26.13.03.02A.
33. Respondent's failure to make a hazardous waste determination for the solid wastes identified in Paragraphs 23 through 25, above, is a violation of COMAR 26.13.02A.

COUNT III

(Failure to Keep Containers of Hazardous Waste Closed when it was Not Necessary to Add or Remove Waste)

34. The allegations of Paragraphs 1 through 33 of the CAFO are incorporated herein by reference as though fully set forth at length.
35. COMAR 26.13.05.09D requires the operator of a hazardous waste facility to ensure that

any container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste, and the container may not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

36. At the time of the Inspection, Respondent stored four open 5-gallon buckets of spent acetone, which is a D001 hazardous waste, in a metal flammable storage cabinet that did not have an air tight seal or other mechanism to prevent the volatilization and escape of this hazardous waste from its containers.
37. Respondent's failure to keep these four containers of D001 hazardous waste closed during storage except when necessary to add or remove waste is a violation of COMAR 26.13.05.09D.

COUNT IV

(Failure to Provide the Generator's EPA Identification Number on Hazardous Waste Manifests)

38. The allegations of Paragraphs 1 through 37 of the CAFO are incorporated herein by reference as though fully set forth at length.
39. COMAR 26.13.03.04A(1) requires a generator who transports or offers for transport a hazardous waste to use an approved manifest, and COMAR 26.13.03.04C(1) provides that manifest shall contain information that includes, *inter alia*, the generator's EPA identification number.
40. Respondent shipped hazardous waste off-site using manifests with an incorrect EPA identification number on the following dates:
 - a. July 17, 2012 – Manifest Tracking Number 006955156JJK
 - b. August 23, 2012 – Manifest Tracking Number 006955185JJK
 - c. September 20, 2012 – Manifest Tracking Number 006955265JJK
 - d. December 4, 2012 – Manifest Tracking Number 006955495JJK.
41. Respondent's failure to provide its EPA identification number on manifests accompanying shipments of hazardous waste is a violation of COMAR 26.13.03.04C(1).

IV. CIVIL PENALTY

42. In settlement of EPA's claims for civil monetary penalties assessable for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty of **THIRTY NINE THOUSAND FOUR HUNDRED DOLLARS (\$39,400.00)**, which Respondent agrees to pay in accordance with the terms set forth below. Such civil penalty amount shall become due and payable immediately upon

Respondent's receipt of a true and correct signed copy of this CA/FO, fully executed by the parties, signed by the Regional Judicial Officer, and filed with the Regional Hearing Clerk. In order to avoid the assessment of interest in connection with such civil penalty as described in this CA/FO, Respondent must pay the civil penalty no later than thirty (30) calendar days after the date on which a copy of this CA/FO is mailed or hand-delivered to Respondent.

43. The aforesaid settlement amount was based upon Complainant's consideration of a number of factors, including, but not limited to, the statutory factors set forth in RCRA § 3008(a)(3) and (g), 42 U.S.C. § 6928(a)(3) and (g), which include the seriousness of the violation and any good faith efforts to comply with applicable requirements, EPA's RCRA Civil Penalty Policy (June 2003) ("Penalty Policy"), and with the penalty inflation provisions of 40 C.F.R. Part 19.
44. Respondent shall remit payment for the civil penalty set forth in Paragraph 42, above, and/or any administrative fees and late payment penalties, in accordance with Paragraphs 45 through 49, below, by either cashier's check, certified check, or electronic wire transfer, in the following manner:

- a. All payments by Respondent shall reference its name and address, and the Docket Number of this action, *i.e.*, RCRA-03-2014-0072;
- b. All checks shall be made payable to "**United States Treasury**";
- c. All payments made by check and sent by regular mail shall be addressed and mailed to:

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

Primary Contact: Craig Steffen 513-487-2091
Secondary Contact: Molly Williams 513-487-2076

- d. All payments made by check and sent by overnight delivery service shall be addressed and mailed to:

U.S. Environmental Protection Agency
Cincinnati Finance Center
Government Lockbox 979077
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63101

Primary Contact: Craig Steffen 513-487-2091
Secondary Contact: Molly Williams 513-487-2076

- e. All payments made by check in any currency drawn on banks with no USA branches shall be addressed for delivery to:

Cincinnati Finance
US EPA, MS-NWD
26 W. M.L. King Drive
Cincinnati, OH 45268-0001

- f. All payments made by electronic wire transfer shall be directed to:

Federal Reserve Bank of New York
ABA: 021030004
Account Number: 68010727
SWIFT address: FRNYUS33
33 Liberty Street
New York, NY 10045

Field Tag 4200 of the Fedwire message should read:
"D 68010727 Environmental Protection Agency"

- g. All electronic payments made through the automated clearinghouse (ACH), also known as Remittance Express (REX), shall be directed to:

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

Physical location of U.S. Treasury facility:
5700 Rivertech Court
Riverdale, MD 20737

Contact: John Schmid 202-874-7026
Remittance Express (REX): 1-866-234-5681

- h. On-Line Payment Option:

WWW.PAY.GOV

Enter sfo 1.1 in the search field. Open and complete the form.

- i. Additional payment guidance is available at:

<http://www2.epa.gov/financial/makepayment>

- j. Payment by Respondent shall reference Respondent's name and address, and EPA Docket Number of this CAFO (Docket No. RCRA-03-2014-0072). A copy of Respondent's check or a copy of Respondent's electronic fund transfer shall be sent simultaneously to:

T. Chris Minshall
Senior Assistant Regional Counsel
U.S. Environmental Protection Agency
Region III (Mail Code 3RC30)
1650 Arch Street
Philadelphia, PA 19103-2029

and

Lydia Guy
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region III (Mail Code 3RC00)
1650 Arch Street
Philadelphia, PA 19103-2029

45. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, EPA is entitled to assess interest, administrative costs and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim, as more fully described below.
46. In accordance with 40 C.F.R. § 13.11(a), interest on any civil penalty assessed in a Consent Agreement and Final Order begins to accrue on the date that a copy of the Consent Agreement and Final Order is mailed or hand-delivered to the Respondent. However, EPA will not seek to recover interest on any amount of such civil penalty that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a).
47. The costs of the Agency's administrative handling of overdue debts will be charged and assessed monthly throughout the period a debt is overdue. 40 C.F.R. § 13.11(b). Pursuant to Appendix 2 of EPA's *Resources Management Directives - Cash Management*, Chapter 9, EPA will assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid.
48. A late payment penalty of six percent per year will be assessed monthly on any portion of

a civil penalty which remains delinquent more than ninety (90) calendar days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on a debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d).

49. Respondent shall not deduct for civil taxation purposes the civil penalty specified in this CAFO.

V. FULL AND FINAL SATISFACTION

50. This settlement shall constitute full and final satisfaction of civil claims for penalties which Complainant may have pursuant to Section 3008(a) and (g) of RCRA, 42 U.S.C. §6928(a) and (g), for the specific violations alleged against Respondent in this Consent Agreement. Compliance with this CAFO shall not be a defense to any action commenced at any time for any other violation of the federal laws and regulations administered by EPA.

VI. CERTIFICATION OF COMPLIANCE

51. Based on the personal knowledge of the signer or an inquiry of the person or persons responsible for the Facility's compliance with Subtitle C of RCRA, by his or her signature herein, the person signing this CA on behalf of the Respondent certifies to EPA, to the best of the person's information and belief, that Respondent, as of the date of its execution of this CA, is in compliance with the provisions of RCRA, Subtitle C, Subtitle C of RCRA, 42 U.S.C. §§ 6921- 6939i, federal hazardous waste regulations set forth at 40 C.F.R. Parts 260-266, 268 and 270-273, and the MdHWMR, COMAR Title 26, Subtitle 13 *et seq.*, at the Facility referenced herein.

VII. RESERVATION OF RIGHTS

52. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. In addition, this settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice. Further, EPA reserves any rights and remedies available to it under RCRA, the regulations promulgated thereunder, and any other federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this CAFO, following its filing with the Regional Hearing Clerk.

VIII. OTHER APPLICABLE LAWS

53. Nothing in this CAFO shall relieve Respondent of any duties otherwise imposed on it by applicable federal, state or local law and/or regulations.

IX. AUTHORITY TO BIND THE PARTIES

54. This CAFO shall apply to and be binding upon EPA, Respondent, and Respondent's officers, employees, agents, successors and assigns. The undersigned representative of Respondent certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and bind Respondent hereto. By his/her signature hereto, Respondent certifies that he/she is fully authorized to enter into the terms and conditions set forth in this CA and to bind the Respondent hereto.

X. ENTIRE AGREEMENT

55. This Consent Agreement and the attached Final Order constitute the entire agreement and understanding of the parties concerning settlement of the above-captioned action and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Consent Agreement and the attached Final Order.

XI. EFFECTIVE DATE

56. The effective date of this CAFO is the date on which the Final Order, signed by the Regional Administrator of U.S. EPA Region III or his designee, is filed with the Regional Hearing Clerk.

For Respondent:

Simpson Strong-Tie Company, Inc.

March 14, 2014
Date

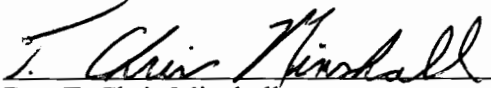

By: Stephen Motzko, CSP

Title: Manager, Environmental Health and Safety

For Complainant:

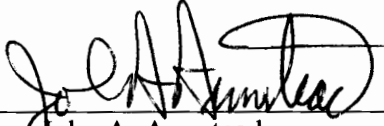
**U.S. Environmental Protection Agency
Region III**

3/18/2014
Date


By: T. Chris Minshall
Title: Senior Assistant Regional Counsel

The Land and Chemicals Division, U.S. Environmental Protection Agency, Region III, recommends that the Regional Administrator or his designee issue the Final Order attached hereto.

3.24.14
Date


By: John A. Armstead
Title: Director, Land and Chemicals Division

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BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, PA 19103-2029

REGIONAL HEARING CLERK
EPA REGION III, PHILA. PA

In the Matter of:	:	
	:	
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5956 W. Las Positas Boulevard	:	Docket No. RCRA-03-2014-0072
Pleasanton, CA 94588	:	
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Simpson Strong-Tie Company, Inc.	:	Proceeding under Section 3008(a) and
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Baltimore, MD 21211	:	Recovery Act, as amended, 42 U.S.C.
	:	Section 6928(a) and (g)
	:	
Facility	:	
	:	

FINAL ORDER

Complainant, the Director of the Land and Chemicals Division, U.S. Environmental Protection Agency, Region III, and Respondent, Simpson Strong-Tie Company, Inc., have executed a document entitled "Consent Agreement" which I ratify as a Consent Agreement in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22 (with specific reference to 40 C.F.R. Sections 22.13(b) and 22.18(b)(2) and (3)). The terms of the foregoing Consent Agreement are incorporated herein by reference.

NOW, THEREFORE, pursuant to Section 3008(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6928(a), and based upon the representations of the parties set forth in the Consent Agreement that the civil penalty amount agreed to by the parties in settlement of the above-captioned matter is based upon a consideration of the factors set forth in RCRA Section 3008(a)(3), 42 U.S.C. § 6928(a)(3), IT IS HEREBY ORDERED THAT

Respondent shall pay a civil penalty in the amount of **THIRTY NINE THOUSAND FOUR HUNDRED DOLLARS (\$39,400.00)** as specified in the Consent Agreement, and comply with the terms and conditions of the Consent Agreement.

In the Matter of:

Simpson Strong-Tie Company, Inc.

Docket No. RCRA-03-2014-0072

The effective date of this Final Order and the accompanying Consent Agreement is the date on which the Final Order is filed with the Regional Hearing Clerk of U.S. EPA, Region III.

Date: 3/26/14

By: *Renee Sarajian*
Renee Sarajian
Regional Judicial Officer
U.S. States Environmental Protection Agency
Region III

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In the Matter of:

Simpson Strong-Tie Company, Inc.

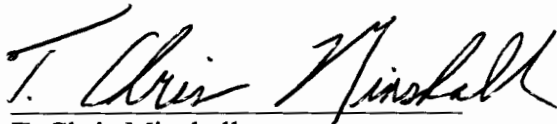
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REGIONAL HEARING CLERK
EPA REGION III, PHILA. PA

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of March 2014, I sent a copy of the foregoing CONSENT AGREEMENT and FINAL ORDER by UPS, to the following person:

Stephen Motzko, CSP
Manager, Environmental Health and Safety
Simpson Strong-Tie Company, Inc.
5956 W. Las Positas Boulevard
Pleasanton, CA 94588



T. Chris Minshall
Senior Assistant Regional Counsel
U.S. Environmental Protection Agency
Region III