

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

IN THE MATTER OF:

Trace City Automobiles, Inc.)	
d/b/a Trace City Toyota)	Docket Number: CAA-04-2007-1503(b)
288 Sgt. S. Prentiss Dr.)	
P.O. Box 1264)	
Natchez, MS 39120)	
Respondent.)	
<hr/>		

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EPA REGION IV
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HEARNINGS CLERK

CONSENT AGREEMENT AND FINAL ORDER

I. Nature of the Action/Jurisdictional Statements

1. This is a civil penalty proceeding pursuant to Section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d), and pursuant to the Consolidated Rules of Practice Governing Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), codified at 40 C.F.R. Part 22. Complainant is the Director of the Air, Pesticides and Toxics Management Division, Region 4, United States Environmental Protection Agency (EPA). Respondent is Trace City Automobiles, Inc., d/b/a Trace City Toyota (hereinafter, "Respondent").

2. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order (CAFO) will simultaneously commence and conclude this matter.

3. The authority to take action under Section 113(d) of CAA, 42 U.S.C. § 7413(d), is vested in the Administrator of EPA. The Administrator of EPA has delegated this authority under the CAA to the Regional Administrators by EPA Delegation 7-6-A. The Regional Administrator, Region 4, has redelegated this authority to the Director, Air, Pesticides, and Toxics Management Division, by EPA Region 4 Delegation 7-6-A. Pursuant to that delegation, the Director of the Air, Pesticides and Toxics Management Division has the authority to commence an enforcement action as the Complainant in this matter.

4. Respondent is a corporation doing business in the State of Mississippi since 2002.

5. Respondent is a "person" as defined in CAA § 302(e), 42 U.S.C. § 7602(e).

6. Respondent performs "service for consideration" as defined at 40 C.F.R. § 82.32(g) at its Trace City Toyota facility located at 288 Sgt. S. Prentiss Dr., Natchez, Mississippi, 39120.

7. Respondent performs "service involving refrigerant," as defined at 40 C.F.R. § 82.32(h), at its service facility located at 288 Sgt. S. Prentiss Dr., Natchez, Mississippi, 39120.

8. Section 609(c) of the CAA, 42 U.S.C. § 7671h(c), and the regulations promulgated at 40 C.F.R. Part 82, Subpart B, establish that no person repairing or servicing motor vehicle air conditioners (MVACs) for consideration may perform any service on a MVAC involving the refrigerant for such air conditioner unless such person has been properly trained and certified.

9. Regulation 40 C.F.R. § 82.34(a) states that no person repairing or servicing MVACs for consideration, and no person repairing or servicing MVAC-like appliances, may perform any service involving the refrigerant for such MVAC or MVAC-like appliance unless any such person repairing or servicing an MVAC has been properly trained and certified by a technician certification program approved by the Administrator pursuant to § 82.40.

10. Section 609(d) of the CAA, 42 U.S.C. § 7671h(d), and regulations promulgated at 40 C.F.R. Part 82, Subpart B, establish that any person servicing MVAC systems shall certify to the Administrator that such person has acquired, and is properly using, approved equipment and that each individual authorized to use the equipment is properly trained and certified.

11. Regulation 40 C.F.R. § 82.42(a) states no later than January 1, 1993, any person repairing or servicing motor vehicle air conditioners for consideration shall certify to the Administrator that such person has acquired, and is properly using, approved equipment and that each individual authorized to use the equipment is properly trained and certified.

12. Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(d), and 40 C.F.R. Part 19, EPA may assess a penalty of not more than \$32,500 for each violation of Section 609 of CAA, 42 U.S.C. § 7671h, that occurred after March 15, 2004.

II. Factual Allegations

13. EPA alleges that, on more than one occasion from August 22, 2005, through February 15, 2006, at its Natchez, Mississippi facility, Respondent performed service for consideration involving the refrigerant of MVAC systems without the use of properly trained and certified technicians. Respondent violated CAA § 609(c), 42 U.S.C. § 7671h(c), and 40 C.F.R. § 82.34(a) by failing to use properly trained and certified technicians while performing service for consideration involving the refrigerant of a MVAC system.

14. EPA alleges that Respondent failed to certify in a timely manner to EPA that persons performing service were using approved refrigerant recovery/recycling equipment. Respondent violated CAA § 609(d), 42 U.S.C. § 7671h(d), and 40 C.F.R. § 82.42(a) by failing to certify in a timely manner that they have acquired and were properly using approved refrigerant recovery/recycling equipment.

III. Consent Agreement

15. For the purposes of this CAFO, Respondent admits the jurisdictional allegations set out in Paragraphs 1 through 12 above, but Respondent neither admits nor denies the factual allegations set out in paragraphs 13 and 14 above.

16. As provided in 40 C.F.R. §22.18(b)(2), Respondent waives any right to contest the allegations listed above and its right to appeal the proposed final order accompanying this consent agreement.

17. Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CAFO.

18. Respondent certifies that as of the date of its execution of this CAFO, it is in compliance at all of its automotive repair facilities that perform MVAC work with all relevant MVAC requirements of the CAA at Section 609.

19. Compliance with this CAFO shall resolve the alleged violations contained herein, and EPA hereby releases Respondent from all liability for the violations of Section 609 alleged herein. This CAFO shall not otherwise affect any liability of Respondent, if any, to the United States. Other than as expressed herein, neither EPA nor Complainant waives any right to bring an enforcement action against Respondent for violation of any federal or state statute, regulation or permit, to initiate an action for imminent and substantial endangerment, or to pursue criminal enforcement.

20. Complainant and Respondent agree to settle this matter by their execution of this CAFO. The parties agree that the settlement of this matter is in the public interest and that this CAFO is consistent with the applicable requirements of the CAA.

IV. Final Order

21. Respondent is assessed a civil penalty of **ONE THOUSAND FOUR HUNDRED TWENTY-ONE DOLLARS (\$1,421.00)** which shall be paid within thirty (30) days after the date Trace City Toyota receives a copy of the fully executed CAFO.

22. This settlement is further supported by, and Respondent shall implement, the Supplemental Environmental Project (SEP) described in Exhibit A, as submitted to EPA in the company's letter of June 22, 2006. Respondent shall expend SEVEN THOUSAND EIGHT HUNDRED FORTY-TWO DOLLARS (\$7,842.00) to complete the SEP. The SEP shall be fully implemented within three hundred sixty-five (365) days of the effective date of this CAFO.

23. If Respondent has not fully expended SEVEN THOUSAND EIGHT HUNDRED FORTY-TWO DOLLARS (\$7,842.00) in performing its selected SEP activities by that date,

Respondent shall pay a stipulated penalty of the difference between SEVEN THOUSAND EIGHT HUNDRED FORTY-TWO DOLLARS (\$7,842) and the amount actually expended, except as described below:

- (a) If the SEP is completed satisfactorily, and Respondent expended at least 90 percent of the total amount required, Respondent shall not pay a stipulated penalty;
- (b) If the SEP was not completed satisfactorily, but Respondent expended at least 90 percent of the total amount required as evidenced by supporting documentation, Respondent shall not pay a stipulated penalty if it made a good faith effort to fully complete the SEP in a timely manner;
- (c) For the purposes of this paragraph, whether Respondent has satisfactorily completed the SEP and whether Respondent made a good faith effort to do so shall be in the sole discretion of EPA;

24. Respondent shall submit SEP interim reports to EPA every 120 days from the effective date of this CAFO. The SEP reports shall discuss Respondent's SEP activities and provide an accounting for its SEP expenditures.

- (a) The SEP Interim Reports shall be sent to Laurie Savoy at the address in Paragraph 30.
- (b) If Respondent fails to submit any SEP Interim Report in a timely manner pursuant to this Paragraph, Respondent shall pay to the United States a stipulated penalty of ONE HUNDRED DOLLARS (\$100.00) for each day until required reports are submitted.

25. No later than 30 calendar days after the completion of the project, Respondent shall submit a SEP Completion Report to EPA. The Report shall include copies of appropriate documentation, including invoices and canceled checks, showing the total amount of SEP expenditures spent on each portion of the SEP.

- (a) The SEP Completion Report and receipts or other documentation for funds expended shall be sent to Laurie Savoy at the address in Paragraph 30.
- (b) If Respondent fails to submit copies of the receipts or other documentation for funds expended, or submit the SEP Completion Report in a timely manner pursuant to this Paragraph, Respondent shall pay to the United

States a stipulated penalty of ONE HUNDRED DOLLARS (\$100.00) for each day until required documents or receipts are submitted.

26. Respondent shall pay any stipulated penalties that accrue under Paragraphs 23, 24 and 25 within fifteen (15) days after the date Respondent receives a written demand from EPA for such penalties.

27. Respondent certifies that, as of the date this CAFO is signed, it is not required to perform any part of the SEP by any federal, state or local law, regulation, permit or order, or by any agreement or grant. Respondent further certifies that, as of this date, it has not received and is not negotiating to receive, credit for any part of the SEP in any other enforcement action of any kind.

28. Any public statement, oral or written, by Respondent making any reference to the SEP shall include the following language: "This project was undertaken in connection with the settlement of an enforcement action taken by the U.S. Environmental Protection Agency, for violations of Section 609 of the Clean Air Act."

29. Respondent shall pay the penalty by forwarding a cashier's or certified check, payable to: "Treasurer, United States of America," to the following address:

US checks in US dollars sent by regular US postal service mail:
U.S. Environmental Protection Agency
P.O. Box 371099M
Pittsburgh, PA 15251

For Fedex and other non-US Postal Service express mail:
Mellon Client Service Center
ATTN: Shift Supervisor, Room 0690
Lockbox 371099M Account 9109125
500 Ross Street
Pittsburgh, PA 15262-0001

The check shall reference on its face the name and the Docket Number of the CAFO.

30. At the time of payment, Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CAFO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. EPA - Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Ms. Laurie Savoy
Air, Pesticides and Toxics Management Division
Air and EPCRA Enforcement Branch
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, Georgia 30303

Ms. Saundi Wilson (OEA)
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, Georgia 30303

31. For the purposes of state and federal income taxation, Respondent shall not be entitled, and agrees not to attempt, to claim a deduction for the civil penalty payment made pursuant to paragraph 21.

32. 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. Interest will therefore begin to accrue on the civil penalty from the date of entry of this CAFO, if the penalty is not paid by the date required. Interest will be assessed at the rate established by the Secretary of Treasury pursuant to 31 U.S.C. § 3717. A charge will be assessed to cover the costs of debt collection, including processing and handling costs and attorney fees. In addition, a penalty charge may be assessed on any portion of the debt that remains delinquent more than ninety (90) days after payment is due.

33. Complainant and Respondent shall bear their own costs and attorney fees in this matter.

34. This CAFO shall be binding upon the Respondent, its successors and assigns.

35. The following individual represents EPA in this matter and is authorized to receive service for EPA in this proceeding:

Ms. Laurie Savoy
Air, Pesticides and Toxics Management Division
Air and EPCRA Enforcement Branch
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-9201

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

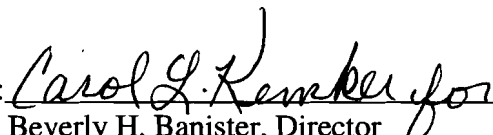
V. Effective Date

37. The effective date of this CAFO shall be the date on which the CAFO is filed with the Regional Hearing Clerk.

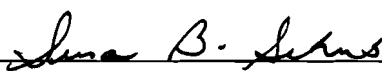
AGREED AND CONSENTED TO:**Trace City Toyota**

By:  Date: 12-26-06
Mr. Danny W. Hammett
President

U.S. Environmental Protection Agency

By:  Date: 1/31/07
Beverly H. Banister, Director
Air, Pesticides and Toxics Management Division,
Region 4

APPROVED AND SO ORDERED this 22nd day of February, 2007.


Susan B. Schub
Regional Judicial Officer

CERTIFICATE OF SERVICE

I hereby certify that on the date set out below I filed the original and one copy of the foregoing Consent Agreement and Final Order and served a true and correct copy of the foregoing Consent Agreement and Final Order, in the Matter of: Trace City Automobiles, Inc., d/b/a Trace City Toyota, Docket No. CAA-04-2007-1503(b), on the parties listed below in the manner indicated:

Mr. Daniel W. Hammett
 President
 Trace City Automobiles, Inc.
 d/b/a Trace City Toyota
 288 Sgt. S. Prentiss Dr.
 P.O. Box 1264
 Natchez, MS 39120

(Via Certified Mail
 Return Receipt Requested)

Alan Dion
 U.S. EPA Region 4
 61 Forsyth Street
 Atlanta, GA 30303

(Via EPA's internal mail)

Laurie Savoy
 Air, Pesticides and Toxics Management Division
 Air and EPCRA Enforcement Branch
 U.S. EPA Region 4
 61 Forsyth Street
 Atlanta, Georgia 30303

(Via EPA's internal mail)

Date: _____

2/23/07

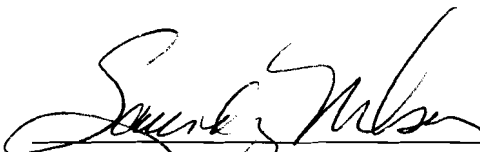

 Patricia A. Bullock, Regional Hearing Clerk
 United States Environmental Protection
 Agency, Region 4
 Atlanta Federal Center
 61 Forsyth Street, S.W.
 Atlanta, GA 30303
 (404)562-9511

EXHIBIT A**FINAL SUPPLEMENTAL ENVIRONMENTAL PROJECT (SEP)**

Submitted to
The United States Environmental Protection Agency
Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303

Submitted by
Trace City Toyota
288 Sgt. S. Prentiss Dr.
Natchez, MS 39120

June 22, 2006

I. Introduction

Trace City Toyota has prepared a Supplemental Environmental Project (SEP) proposal in accordance with the EPA Supplemental Environmental Projects Policy effective May 1, 1998, as part of an enforcement settlement for a technical violation of Section 609 of the Clean Air Act.

Trace City Toyota, Inc. will implement at its own expense, a Motor Vehicle Air Conditioning (MVAC) System Inspection and Repair Program to include:

- Performance tests
- Conversions from Freon 12 (and other ozone-depleting substances) to Refrigerant 134a (or other non-ozone-depleting substances)
- Reseals for leaking units
- Other MVAC repairs

All Trace City Toyota, Inc. technicians are currently certified for air conditioning repairs involving MVAC. The cost for recertification of the one technician who could not produce his certificate was \$15.00. Any future technicians will be required to produce their Section 609 certification, a copy of which will be kept on file at the dealership.

Exhibit A contains a complete description of the proposed services and objectives included in our SEP. The costs associated with these services and an estimated schedule of completion will also be included.

II. Category of SEP

This project qualifies as SEP under May 1, 1998 SEP Policy in several respects.

The project qualifies as a Pollution Prevention SEP because its goal and effect will be to reduce emissions of refrigerants into the atmosphere by leaking motor vehicle air conditioning systems. The project will provide safeguards designed to prevent uncertified technicians from performing MVAC service and repair work. The purpose of the certification requirement is to prevent untrained technicians from performing functions that may result in the release of refrigerant into the air. The project will also decrease the amount of pollution released to the environment by evacuating refrigerant from leaking vehicles through the use of an EPA - approved recycling equipment.

The project also qualifies as a Benefit to Public Health (or Environment) by reducing emissions of ozone-depleting substances into the environment. The project also promotes the reduction of ozone-depleting substances by providing conversions/retrofits for leaking MVACs using Freon (or other ozone-depleting substances) to non ozone-depleting substances (R134a, etc.) Using Section 609 certified technicians to perform MVAC repairs will reduce the risk of ozone-depleting substances releases. Less ozone-depleting substances in the atmosphere reduces the adverse affects to human health and the environment from ultraviolet rays in sunlight.

III. Analysis under the May 1, 1998 SEP Policy

1. **Relevance.** The proposed project is an appropriate application under the 1998 SEP Policy. The violation involved using an alleged uncertified technician to perform MVAC repairs. The SEP will eliminate or substantially reduce the possibility that such a violation will occur in the future and reduces the amount of refrigerants that are released to the atmosphere via leaking motor vehicles.
2. **Declared Objectives.** As required by the 1998 SEP Policy, the SEP advances the declared objectives of Title VI of the Clean Air Act (CCA) by ensuring that only certified technicians perform MVAC service, thus conferring a benefit to human health or the environment. This proposed project is not inconsistent with any provisions of the CAA. This SEP will also reduce ozone-depleting substances (ODS) that are released to the atmosphere by converting leaking motor vehicle ODS systems to non-ODS systems.
3. **Lack of Federal Oversight.** This proposed SEP meets the new SEP policy requirement that neither EPA nor any other Federal agency may play any role in setting aside funds or an escrow for the performance of the SEP. Further, EPA does not have authority to manage or administer the SEP. EPA merely reserves the right to ensure the project is implemented pursuant to the provisions of the settlement and retains legal recourse if the SEP is not adequately performed.

4. **Determinative Requirement.** The type and scope of this project is determined in the settlement agreement and no issue is left for interpretation or negotiation after entry of the CAFO.
5. **Non-EPA Project.** The proposed SEP is not something EPA itself is required by any of its statutes to perform. Nor will this project provide EPA with additional resources to perform an activity for which Congress has specifically appropriated funds. Further, this project is not an expansion of existing EPA programs.
6. **Performance by a Third Party.** This SEP will be performed by the Respondent directly. No third party performance issues are implicated.
7. **Oversight and Drafting Enforceable SEP.** This CAFO will be drafted to ensure that the SEP is completed within a specific timetable, that Respondent will provide documentation to ensure that it was completed properly, and that any failure to complete the SEP as approved will result in stipulated penalties. It will be drafted to conform to all requirements included in the SEP Policy to ensure enforceability.
8. **Failure of SEP and Stipulated Penalty.** If the Respondent fails to complete the SEP as specified in the CAFO, there will be stipulated penalties in the amounts suggested by drafting guidance issued with the SEP Policy.

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Project Description: Motor Vehicle Air Conditioning (MVAC) System Inspection and Repair Program

Trace City Toyota, Inc.

I. Description of Services

Trace City Toyota, Inc. will perform at its own expense, an **Air Conditioning System Performance Test** on all automobiles, upon customer approval, that are brought into its service center, regardless of the reason for such visit. As part of this test, an EPA 609 certified technician will connect the recovery/recycling station to the motor vehicle air conditioner (MVAC) system. Next, the technician will measure the air temperature outside the vehicle, take readings on the MVAC system high and low side pressures, and take temperature readings at the center air outlet vents, both with the engine running at 3000 rpm. These figures will then be compared to standard pressure-temperature charts to determine if the MVAC system is working properly.

Trace City Toyota, Inc. will also perform, at its own expense, and **Air Conditioning System Leak Test** on automobiles, upon customer approval. For vehicles submitted for service, the company agrees not to perform leak checks/repairs on vehicles or vehicles of its employees to fulfill the requirements of this SEP. In performing this test, the Section 609 certified technician will connect the recovery/recycling station to the MVAC system and charge the system. Then, using the refrigerant leak detector, the technician will check the system for leaks. Any leaks found will then be repaired, and then the system will be evacuated.

If the diagnostic results from the performance test indicate that repairs are necessary and/or a leak is detected in the MVAC system, any reasonable and necessary repairs will be made without cost to the customer after the system is properly evacuated using EPA-approved equipment. Diagnostic results indicating a problem include, but are not limited to pressure readings that are too high or too low and unsatisfactory outlet vent temperatures.

Where appropriate, Trace City Toyota, Inc. will also perform a **Conversion or Retrofit** for any improperly performing MVAC systems that are configured to use R-12 refrigerant (or other ozone-depleting refrigerant). Retrofits of automobiles will take place in accordance with the retrofit requirements found in 40 C.F.R. Part 82 Appendix C to Subpart G. The approved substitute for R-12 (or other ozone-depleting refrigerant) in MVAC systems. Trace City Toyota, Inc. will pay for all parts and labor needed for all repairs, including retrofitting.

II. Costs Incurred by Services

- An Air Conditioning System Performance Test costs Trace City Toyota, Inc. \$60.00, plus the cost of Freon/Refrigerant, to perform.
- Air conditioning repairs are performed at a labor rate of \$60.00 per hour (per Mitchell Flat Rate Manual), plus parts and Freon/Refrigerant needed to repair the leak.
- The Air Conditioning System Leak Test costs Trace City Toyota, Inc. \$85.00, plus the cost of Freon/Refrigerant, to perform.
- Air Conditioning System Conversions/Retrofits are performed at a labor rate of \$60.00 per hour (per Mitchell Flat Rate Manual), plus parts and Freon/Refrigerant needed to repair the leak.

III. Net costs Incurred by Trace City Toyota, Inc. through the SEP

As part of a Settlement with the EPA and in accordance with the Supplemental Environmental Project Policy, Trace City Toyota, Inc. is proposing to perform Motor Vehicle Air Conditioning (MVAC) System Inspections, Repairs and ODS Conversions at their own expense, until the total cost reaches \$7842.00.

Trace City Toyota, Inc. has recertified at a cost of \$15.00, the one technician that had no proof of his certification under Section 609. We will keep a copy of the certification on file for all technicians that do MVAC repairs in the future.

Trace City Toyota, Inc. will begin implementation of this SEP, upon final approval of the Environmental Protection Agency and complete the project as soon as it is practically possible.

As President of Trace City Toyota, I have reviewed this plan.

Sincerely,



Danny Hammitt,
Trace City Toyota

EPA ACCOUNTS RECEIVABLE CONTROL NUMBER FORM

TO BE COMPLETED BY THE ORIGINATING OFFICE:

(Attach a copy of the final order and transmittal letter to Defendant/Respondent)

This form was originated by: Saundi Wilson on 2/22/07
(Name) (Date)

in the OEA, CATGL at (404) 562-9504
(Office) (Telephone Number)

Non-SF Judicial Order/Consent Decree
USAO COLLECTS

Administrative Order/Consent Agreement
FMO COLLECTS PAYMENT

SF Judicial Order/Consent Decree
DOJ COLLECTS

Oversight Billing - Cost Package required:
Sent with bill

Other Receivable

Not sent with bill

This is an original debt

Oversight Billing - Cost Package not required

This is a modification

PAYEE: Trace City Automobiles Inc d/b/a Trace City Toyota
(Name of person and/or Company/Municipality making the payment)

The Total Dollar Amount of the Receivable: \$ 1421-
(If installments, attach schedule of amounts and respective due dates. See Other side of this form.)

The Case Docket Number: CAA 04 2007 1503

The Site Specific Superfund Account Number: _____

The Designated Regional/Headquarters Program Office: _____

TO BE COMPLETED BY LOCAL FINANCIAL MANAGEMENT OFFICE:

The IFMS Accounts Receivable Control Number is: _____ Date _____

If you have any questions, please call: Peggy Whitney of the Financial Management Section at: (404) 562-8238.

DISTRIBUTION:

A. **JUDICIAL ORDERS:** Copies of this form with an attached copy of the front page of the **FINAL JUDICIAL ORDER** should be mailed to:

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| 1. Debt Tracking Officer
Environmental Enforcement Section
Department of Justice RM 1647
P.O. Box 7611, Benjamin Franklin Station
Washington, D.C. 20044 | 2. Originating Office (EAD)
3. Designated Program Office |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|

B. **ADMINISTRATIVE ORDERS:** Copies of this form with an attached copy of the front page of the Administrative Order should be to:

- | | |
|----------------------------------------------------|-----------------------------------------------------------|
| 1. Originating Office
2. Regional Hearing Clerk | 3. Designated Program Office
4. Regional Counsel (EAD) |
|----------------------------------------------------|-----------------------------------------------------------|