

EPA ENFORCEMENT ACCOUNTS RECEIVABLE CONTROL NUMBER FORM FOR ADMINISTRATIVE ACTIONS

This form was originated by Wanda I. Santiago for

Chris Rascher
Name of Case Attorney

9/30/14
Date

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

Case Docket Number EPCRA-01-2014-0055

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:

Fiber Materials Inc
5 Morin Street
Biddeford, ME 04005

Total Dollar Amount of Receivable \$ 6,935 Due Date: 10/30/14

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

September 30, 2014

BY HAND

Wanda Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 1 (ORA 18-1)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

RECEIVED
SEP 30 2014
EPA ORC WS
Office of Regional Hearing Clerk

Re: *In re Fiber Materials Inc.*, Docket No. EPCRA-01-2014-0055

Dear Ms. Santiago:

Enclosed for filing are the following original documents, and one copy of each, relating to the above-referenced matter:

1. Consent Agreement and Final Order; and
2. Certificate of Service.

Kindly file the documents in the usual manner. Thanks very much for your help.

Very truly yours,

A handwritten signature in blue ink that reads "Chris Rascher".

Chris Rascher
EPCRA 313 Enforcement Coordinator

Enclosures

cc: David Loper (Director of Operations, Fiber Materials Inc.)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR**

In the Matter of:)	
)	
Fiber Materials Inc.)	CONSENT AGREEMENT
5 Morin Street)	AND FINAL ORDER
Biddeford, Maine 04005)	
)	
Respondent.)	Docket No.
)	EPCRA-01-2014-0055
Proceeding under Section 325(c) of the Emergency)	
Planning and Community Right-to-Know Act,)	
42 U.S.C. § 11045(c))	
)	

Complainant, the United States Environmental Protection Agency, Region 1 (“EPA”) alleges that Respondent, Fiber Materials Inc., has violated Section 313 of Title III of the Superfund Amendments and Reauthorization Act, 42 U.S.C. §11023 (also known as the Emergency Planning and Community Right-to-Know Act or “EPCRA”), and the federal regulations promulgated thereunder.

EPA and Respondent agree that settlement of this matter is in the public interest and that entry of this Consent Agreement and Final Order (“CAFO”) without further litigation is the most appropriate means of resolution. Pursuant to 40 C.F.R. § 22.13(b) of EPA’s “Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits,” 40 C.F.R. Part 22, EPA and Respondent agree to simultaneously commence and settle this action by the issuance of this CAFO.

RECEIVED

SEP 30 2014

EPA ORC WS
Office of Regional Hearing Clerk

Therefore, before any hearing, without adjudication of any issue of fact or law, upon the record, and upon consent and agreement of EPA and Respondent, it is hereby ordered and adjudged as follows:

I. EPCRA STATUTORY AND REGULATORY AUTHORITY

1. Section 313(a) of EPCRA, 42 U.S.C. § 11023(a), requires owners or operators of a facility subject to the requirements of Section 313(b) to submit annually, by no later than July 1 of each year, a Toxic Chemical Release Inventory Reporting Form, EPA Form 9350-1 (hereinafter, "Form R"), for each toxic chemical listed under 40 C.F.R. § 372.65 that was manufactured, processed, or otherwise used during the preceding calendar year in quantities exceeding the toxic chemical thresholds established under Section 313(f) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. §§ 372.25 and 372.28. Each Form R is required to be submitted to the Administrator of EPA and to the state in which the subject facility is located. Form Rs are hereinafter referred to as "TRI Forms."

2. Section 313(b) of EPCRA, 42 U.S.C. § 11023(b), and 40 C.F.R. § 372.22 provide that owners or operators of facilities that have 10 or more full-time employees; that are in a Standard Industrial Classification ("SIC") code or North American Industry Classification System ("NAICS") code set forth in 40 C.F.R. § 372.23; and that manufactured, processed, or otherwise used a toxic chemical listed under 40 C.F.R. § 372.65 in a quantity exceeding the established threshold during a calendar year are required to submit a TRI Form for each of these substances for that year.

3. Section 325(c) of EPCRA, 42 U.S.C. § 11045(c) (as amended by the Federal Civil Penalties Inflation Adjustment Act, 28 U.S.C. § 2461, and the Debt

Collection Improvement Act, 31 U.S.C. § 3701), and EPA's Civil Monetary Penalty Inflation Adjustment Rule, promulgated thereunder at 40 C.F.R. Part 19, authorizes the assessment of civil administrative penalties of up to \$32,500 per day for each violation of Section 313 of EPCRA that occurred after March 15, 2004 through January 12, 2009, and \$37,500 per day for each violation that occurred after January 12, 2009.

II. GENERAL ALLEGATIONS

4. Respondent Fiber Materials Inc. is the owner and operator of its manufacturing facility (the "Facility") with a usual place of business at 5 Morin Street, Biddeford, Maine.

5. Respondent manufactures carbon fiber-graphite parts and graphitized phenolic fiber form parts, which are used as insulation. Both are generally for the aerospace and military industries.

6. The Facility is primarily engaged in manufacturing carbon and graphite fibers and other carbon, graphite, and metal-graphite products covered under NAICS 335991 (Carbon and Graphite Product Manufacturing).

7. In creating these products, the facility processed 104,052 pounds of coal tar pitch in 2012. The Material Safety Data Sheet for this product indicated that the polycyclic aromatic compound ("PACs") percentage for the coal tar pitch used at the facility is 4.5-5%. Pursuant to 40 C.F.R. § 372.65(c) (list of "chemical categories in alphabetic order"), PACs are in a TRI chemical category that includes 21 or more specific chemicals. PACs are classified as Persistent Bioaccumulative Toxic (PBT) chemicals, having a reporting threshold of 100 pounds. See list in 40 C.F.R. § 372.28(c).

8. The facility calculated that it processed 4,912 pounds of PACs in 2012.

9. On or about May 22, 2014, an authorized employee of the EPA inspected the Facility for the purpose of determining Respondent's compliance with EPCRA Section 313 reporting requirements.

10. Respondent is a "person," as that term is defined by Section 329(7) of EPCRA, 42 U.S.C. § 11049(7).

11. Respondent is an owner or operator of a "facility," as that term is defined by Section 329(4) of EPCRA, 42 U.S.C. § 11049(4), and 40 C.F.R. § 372.3.

12. The facility has 10 or more "full-time employees," as that term is defined by 40 C.F.R. § 372.3.

13. The facility is classified in a SIC code or NAICS code set forth in 40 C.F.R. § 372.23.

14. During the calendar year 2012, Respondent manufactured, processed or otherwise used a toxic chemical listed under 40 C.F.R. § 372.65 at the facility in quantities exceeding the established thresholds.

15. The requirements of Section 313 of EPCRA, 42 U.S.C. § 11023, therefore apply to Respondent's facility.

III. EPCRA VIOLATIONS

Failure to File TRI Form for PACs for Reporting Year 2012

16. The foregoing paragraphs 1 through 15 are incorporated by reference as if fully set forth herein.

17. During the calendar year 2012, Respondent manufactured, processed or otherwise used PACs, a group of chemicals listed under 40 C.F.R. § 372.65, at the Facility in a quantity exceeding the established threshold. Respondent was therefore

required to submit to the Administrator of EPA a TRI Form for this chemical on or before July 1, 2013.

18. Respondent failed to submit this form to the Administrator of EPA on or before July 1, 2013. Respondent did not submit a certified TRI Form until December 13, 2013. Respondent's failure to timely submit this form was in violation of Section 313 of EPCRA and 40 C.F.R. Part 372.

IV. TERMS OF SETTLEMENT

19. Respondent certifies that it has corrected the alleged violation cited in this CAFO and will operate the facility in compliance with Section 313 of EPCRA and the regulations promulgated thereunder.

20. Respondent agrees that EPA has jurisdiction over the subject matter alleged in this CAFO and hereby waives any defenses it might have as to jurisdiction and venue.

21. Respondent acknowledges that it has been informed of its right to request a hearing in this proceeding and hereby waives its right to a judicial or administrative hearing or appeal on any issue of law or fact set forth in this CAFO.

22. Without admitting or denying the facts and violations alleged in this CAFO, Respondent consents to the terms and issuance of this CAFO and agrees to the payment of the civil penalty set forth herein.

23. Pursuant to the relevant factors for penalties issued pursuant to Section 325(c)(1) of EPCRA, 42 U.S.C. § 11045(c)(1), and taking into account any such matters as justice may require, and in light of the Supplemental Environmental Project ("SEP") Respondent has agreed to complete as described below, Complainant has determined that

it is fair and proper that Respondent pay a total civil penalty in the amount of six thousand nine hundred and thirty-five dollars (\$6,935) to resolve the alleged violations of Section 313 of EPCRA.

24. Respondent agrees to pay a civil penalty in the amount of six thousand nine hundred and thirty-five dollars (\$6,935) in the manner described below:

a. Payment shall be in a single payment of six thousand nine hundred and thirty-five dollars (\$6,935), **due no later than 30 calendar days** from the date of the Final Order. If the due date for the payment falls on a weekend or federal holiday, then the due date is the next business day. The date the payment is made is considered to be the date processed by U.S. Bank, as described below. Payment must be received by 11:00 a.m. Eastern Standard Time to be considered as received that day.

b. The payment shall be made by remitting a check or making an electronic payment, as described below. The check or other payment shall designate the name and docket number of this case ("*In the Matter of Fiber Materials Inc.*, EPCRA-01-2014-0055"), be in the amount stated in part "a," above, and be payable to "Treasurer, United States of America. The payment shall be remitted as follows:

If remitted by regular U.S. mail:

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

If remitted by any overnight commercial carrier:

U.S. Bank
1005 Convention Plaza

Mail Station SL-MO-C2GL
St. Louis, Missouri 63101

If remitted by wire transfer: Any wire transfer must be sent directly to the Federal Reserve Bank in New York City using the following information:

Federal Reserve Bank of New York
ABA = 021030004
Account = 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read "D 68010727 Environmental Protection Agency"

If remitted through the Automated Clearing House (ACH) for receiving US currency:

U.S. 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, Maryland 20737

Contacts: John Schmid (202-874-7026) and REX (Remittance Express)
800-234-5681

If remitted on-line with a debit card, credit card, or bank account transfer:
No user name, password, or account number is necessary for this option. On-line payment can be accessed via WWW.PAY.GOV, entering 1.1 in the form search box on the left side of the screen to access the EPA's Miscellaneous Payment Form, opening the form, following the directions on the screen and, after selecting "submit data," entering the relevant debit card, credit card, or bank account information.

c. At the time of payment, a copy of the check (or notification of other type of payment) shall also be sent to:

Chris Rascher, Environmental Engineer
Office of Environmental Stewardship (OES05-1)
U.S. Environmental Protection Agency, Region I

5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

and

Wanda Santiago
Office of Regional Counsel (ORA 18-1)
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Supplemental Environmental Project (“SEP”)

25. Respondent shall complete the Supplemental Environmental Project (“SEP” or “Project”) as described in Attachment 1, which the parties agree is intended to secure significant environmental and public health protection and benefits.

26. Respondent shall satisfactorily complete the SEP according to the requirements and schedule set forth in Attachment 1, which is incorporated herein by reference and is enforceable by this CAFO. The SEP is projected to cost \$13,240.

27. **SEP Completion Report.** Respondent shall submit a SEP Completion Report within 30 days of completion of the SEP. The SEP Completion Report shall contain the following information: (i) a detailed description of the SEP as implemented; (ii) a list of itemized costs for implementing the SEP; (iii) a certification by Respondent that the SEP has been fully implemented pursuant to the provisions of this CAFO and in accordance with Attachment 1; and (iv) a description of the environmental and public health benefits resulting from implementation of the SEP.

28. Respondent agrees that failure to submit the report required by paragraph 27 shall be deemed a violation of this CAFO, and Respondent shall become liable for stipulated penalties pursuant to paragraph 31 below.

29. Respondent shall submit all notices, submissions, and reports required by

this CAFO to Chris Rascher by e-mail at rascher.chris@epa.gov and by First Class mail or any other commercial delivery service to EPA at the address set forth below:

Chris Rascher, Environmental Engineer
Office of Environmental Stewardship (OES05-1)
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

30. After receipt of the SEP Completion Report described in paragraph 27 above, EPA will notify Respondent in writing
- a. That EPA concludes that the SEP has been completed satisfactorily;
 - b. That EPA has determined that the project has not been completed satisfactorily and is specifying a reasonable schedule for correction of the SEP or the SEP Completion Report; or
 - c. That EPA has determined that the SEP does not comply with the terms of this CAFO and is seeking stipulated penalties in accordance with paragraph 31 herein. If EPA notifies Respondent pursuant to subparagraph (b) above that the SEP itself or the SEP Completion Report does not comply with the requirements of this CAFO, Respondent shall make such corrections to the SEP and/or modify the SEP Completion Report in accordance with the schedule specified by EPA.

If EPA notifies Respondent that the SEP itself does not comply with the requirements of this CAFO, Respondent shall pay stipulated penalties to EPA in accordance with paragraph 31 herein.

31. Stipulated Penalties.

a. In the event that Respondent fails to comply with any of the terms or provisions of this CAFO relating to performance of the SEP, Respondent shall be liable for stipulated penalties according to the provisions set forth below:

i. Except as provided in subparagraph (ii) below, for a SEP which has not been completed satisfactorily pursuant to this CAFO, Respondent shall pay a stipulated penalty to the United States of \$16,550, plus interest from the effective date of the CAFO.

ii. If the SEP is not completed in accordance with this CAFO, but EPA determines that the Respondent: (a) made good faith and timely efforts to complete the project; and (b) certifies, with supporting documentation, that 100 percent of the amount of money which was projected to be spent was expended on the SEP, Respondent shall not be liable for any stipulated penalty.

iii. In the event that Respondent completes the SEP in accordance with Attachment 1 but the total expenditure for the SEP is less than \$13,240, Respondent shall pay a stipulated penalty to the United States in the amount equal to the difference between \$13,240 and the actual amount spent on the Project, plus interest from the effective date of the CAFO, unless EPA, in its sole discretion, chooses to reduce the stipulated penalty.

iv. For failure to submit the SEP Completion Report, Respondent shall pay a stipulated penalty in the amount of \$100 for each

day it is late until the Report is submitted.

b. The determinations of whether the SEP has been satisfactorily completed and whether the Respondent has made a good faith, timely effort to implement the SEP shall be in the sole discretion of EPA.

c. Stipulated penalties shall begin to accrue on the day after performance is due, and shall continue to accrue through the final day of the completion of the activity.

d. Respondent shall pay stipulated penalties not more than fifteen (15) days after receipt of written demand by EPA for such penalties. The method of payment shall be in accordance with the provisions of paragraph 24. Interest and late charges shall be paid as stated in paragraph 35.

e. Payment of stipulated penalties shall be in addition to any other relief available under federal law. EPA may, in its sole discretion, decide not to seek stipulated penalties or to waive any portion of the stipulated penalties that accrue pursuant to this CAFO.

32. Respondent certifies that, as of the date of this CAFO, Respondent is not required to perform the SEP by any federal, state, or local law or regulation, nor is Respondent required to perform the SEP under any grant or agreement with any governmental or private entity, as injunctive relief in this or any other case, or in compliance with state or local requirements. Respondent further certifies that it has not received, and is not presently negotiating to receive, credit in any other enforcement action for the SEP.

33. Respondent certifies that it is not a party to any open federal financial assistance transaction that is funding or could be used to fund the same activity as the SEP. Respondent further certifies that, to the best of its knowledge and belief after reasonable inquiry, there is no such open federal financial transaction that is funding or could be used to fund the same activity as the SEP, nor has the same activity been described in an unsuccessful federal financial assistance transaction proposal submitted to EPA within two years of the date of this settlement (unless the project was barred from funding as statutorily ineligible). For the purposes of this certification, the term "open federal financial assistance transaction" refers to a grant, cooperative agreement, loan, federally-guaranteed loan guarantee or other mechanism for providing federal financial assistance whose performance period has not yet expired.

34. Respondent agrees that any public statement, oral or written, in print, film, or other media, made by Respondent making 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 the Clean Air Act."

35. Collection of Unpaid Stipulated Penalties for SEP and Unpaid EPCRA Civil Penalty. 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 (a) any stipulated penalty relating to the performance of SEPs pursuant to paragraph 31 above is not paid when due or (b) any partial payment of the civil penalty in paragraph 23 is not paid when due, the penalty shall be payable, plus accrued interest, without demand. Interest shall be payable

at the rate of the United States Treasury tax and loan rate in accordance with 31 C.F.R. § 901.9(b)(2) and shall accrue from the original date on which the penalty was due to the date of payment. In addition, a penalty charge of six percent per year will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. Should assessment of the penalty charge on the debt be required, it will be assessed as of the first day payment is due under 31 C.F.R. § 901.9(d). In any such collection action, the validity, amount, and appropriateness of the penalty shall not be subject to review.

36. All civil and stipulated penalties, interest, and other charges provided for herein shall represent penalties assessed by EPA within the meaning of 26 U.S.C. § 162(f) and are not deductible for purposes of federal, state, or local taxes. Accordingly, Respondent agrees to treat all payments made pursuant to this CAFO as penalties within the meaning of Section 1.61-21 of the Internal Revenue Code, 26 U.S.C. § 162-21, and further agrees not to use these payments in any way as, or in furtherance of, a tax deduction under federal, state, or local law.

37. The provisions of this CAFO shall be binding upon Respondent and Respondent's officers, directors, agents, servants, employees, and successors or assigns.

38. Respondent shall bear its own costs and attorney's fees in this proceeding.

39. This CAFO constitutes a settlement by EPA of all claims for civil penalties pursuant to Section 325(c) of EPCRA for the violations of the EPCRA specifically alleged in this CAFO. Compliance with this CAFO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by EPA, and it is the responsibility of Respondent to comply with such laws

and regulations. This CAFO in no way relieves Respondent or its employees of any criminal liability. Nothing in this CAFO shall be construed to limit the authority of the United States to undertake any action against Respondent in response to conditions which may present an imminent and substantial endangerment to the public.

40. The undersigned representative of Respondent certifies that he or she is fully authorized by Respondent to enter into the terms and conditions of this CAFO and legally bind Respondent.

41. The terms, conditions, and requirements of this CAFO may not be modified without the written agreement of both parties and approval of the Regional Judicial Officer, except that the Regional Judicial Officer need not approve written agreements modifying the SEP schedules described in paragraphs 25 and 26.

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

RESPONDENT:

Fiber Materials Inc.

By: 
David Loper
Director of Operations
Fiber Materials Inc.

Date: 9/26/14

COMPLAINANT:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

By: 

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

Date: 9/29/14

VII. FINAL ORDER

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

Date: 9/29/14



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

APPENDIX A – SUPPLEMENTAL ENVIRONMENTAL PROJECT

FIBER MATERIALS INC., DOCKET NO. EPCRA-01-2014-0055

SCOPE OF WORK

Fiber Materials Inc. (“Respondent”) operates a facility at 5 Morin Street, Biddeford, Maine (the “Facility”) where it manufactures carbon fiber-graphite parts and graphitized phenolic fiber form parts. In the Consent Agreement and Final Order, EPA alleges that Respondent violated certain reporting requirements under the Emergency Planning and Community Right-to-Know Act (“EPCRA”). Respondent shall perform this supplemental environmental project (“SEP”) as a component of its settlement with EPA. All time frames referred to within the Scope of Work relate to the effective date of the Consent Agreement and Final Order.

This SEP is designed to provide needed equipment to local emergency responders that will help responders detect and respond to releases of toxic chemicals in the community. The SEP requires Respondent to purchase and deliver the following specialized emergency response equipment to the Biddeford Fire Department (“BFD”), which operates and responds to incidents involving accidental releases of hazardous chemicals in the vicinity of Respondent’s facility:

Equipment	Estimated Cost	Vendor	Completion Deadline
One (1) SMC TerrAdaptor Tripod System	\$3,735	Rock-n-Rescue (Butler, PA)	March 31, 2015
One (1) BW Technologies GasAlertMicro 5 PID	\$1,705	A.J. Abrams Co., Inc. (Sharon, MA)	March 31, 2015
Ten (10) MSA H45 Carbon Wrapped Cylinders	\$7,800	Northeast Emergency Apparatus LLC (Auburn, ME)	March 31, 2015

Providing this equipment will prepare local emergency personnel to respond to accidental releases of hazardous chemicals in the community, which will reduce risks to public health and the environment. The equipment to be purchased is relevant to emergency responses involving chemicals that are regulated pursuant to EPCRA. It includes: specialized equipment used by emergency response teams to respond to incidents involving hazardous chemicals contained in industrial tanks or other circumstances that require confined space entry; a gas detection unit that includes sensors to measure the levels of various gases in the air that can be used to prevent responders from entering environments where toxic fumes could be present without proper protection; and air cylinders that will increase the time that responders can spend responding to emergencies in an immediately dangerous to life and health (“IDLH”) atmosphere.

In order to satisfactorily complete the SEP, Respondent shall purchase and deliver, or ensure the purchase and delivery of, the equipment listed in the table above to BFD by the completion deadline specified therein.

SEP TOTAL COST:

\$13,240.00

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

In the matter of)
)

Docket No. EPCRA-01-2014-0055

FIBER MATERIALS INC.)
)

5 Morin Street)
Biddeford, ME 04005)

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:

Ms. Wanda Rivera
Regional Hearing Clerk
U.S. EPA, Region I (ORA18-1)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Copy, by Certified Mail,
Return Receipt Requested:

David Loper
Director of Operations
Fiber Materials Inc.
5 Morin Street
Biddeford, ME 04005

Dated: 9/30/14


Chris Rascher
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100 (OES 05-1)
Boston, MA 02109-3912
Tel (617) 918-1834
Fax (617) 918-0834