



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

September 2, 2022

VIA E-MAIL
DELIVERY RECEIPT REQUESTED

Milorad Milatovic, General Manager
Michigan City Sanitary District
1100 E. 8th Street,
Michigan City, Indiana 46360

Email: mmilatovic@mcsan.org

Dear Milorad Milatovic:

Enclosed is a file-stamped Consent Agreement and Final Order (CAFO) which resolves Michigan City Sanitary District, docket no. CAA-05-2022-0023. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on September 2, 2022.

Pursuant to paragraph 83 of the CAFO, Michigan City Sanitary District must pay the civil penalty within 30 days of the filing date. Your check must display the case name and case docket number.

Please direct any questions regarding this case to Maria Dambriunas, Assistant Regional Counsel, 312-353-2022.

Sincerely,

Frank,
Nathan

Digitally signed by Frank,
Nathan
Date: 2022.08.23
16:06:53 -05'00'

Nathan Frank, Supervisor
Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure

cc: Ann Coyle, Regional Judicial Officer/via electronic mail
Coyle.ann@epa.gov

Regional Hearing Clerk/via electronic mail
R5hearingclerk@epa.gov

Maria Dambriunas/via electronic mail
Dambriunas.maria@epa.gov
Janusz Johnson/via electronic mail
Jjohnson@idem.IN.gov

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	Docket No. CAA-05-2022-0023
)	
Michigan City Sanitary District)	Proceeding to Assess a Civil Penalty
Michigan City, Indiana,)	Under Section 113(d) of the Clean Air Act,
)	42 U.S.C. § 7413(d)
Respondent.)	
<hr style="border: 1px solid black;"/>)	

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 113(d) of the Clean Air Act (the CAA), 42 U.S.C. § 7413(d), and Sections 22.1(a)(2), 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), as codified at 40 C.F.R. Part 22.

2. Complainant is the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency (EPA), Region 5.

3. Respondent is Michigan City Sanitary District (MCSD), a municipality doing business in Indiana.

4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

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

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO and its right to appeal this CAFO.

Statutory and Regulatory Background

Clean Air Act, Subsection 112(r)

9. Section 112(r)(1) of the Act, 42 U.S.C. § 7412(r)(1), provides that it shall be the objective of the regulations and programs authorized under this subsection to prevent the accidental release and to minimize the consequences of any such release of any substance listed pursuant to Section 112(r)(3), or any other extremely hazardous substance.

10. Section 112(r)(3) of the Act, 42 U.S.C. § 7412(r)(3), provides that the Administrator shall promulgate, not later than 24 months after November 15, 1990, an initial list of 100 substances which, in the case of an accidental release, are known to cause or may reasonably be anticipated to cause death, injury, or serious adverse effects to human health or the environment.

11. Section 112(r)(7)(A) of the Act, 42 U.S.C. § 7412(r)(7)(A), provides that in order to prevent accidental releases of regulated substances, the Administrator is authorized to promulgate release prevention, detection, and correction requirements which may include monitoring, record-keeping, reporting, training, vapor recovery, secondary containment, and other design, equipment, work practice, and operational requirements.

12. Section 112(r)(7)(B)(i) of the Act, 42 U.S.C. § 7412(r)(7)(B)(i), provides that within 3 years after November 15, 1990, the Administrator shall promulgate reasonable

regulations and appropriate guidance to provide, to the greatest extent practicable, for the prevention and detection of accidental releases of regulated substances and for response to such releases by the owners or operators of the sources of such releases.

13. Section 112(r)(7)(B)(ii) of the Act, 42 U.S.C. § 7412(r)(7)(B)(ii), provides that the regulations under Section 112(r)(7)(B) shall require the owner or operator of stationary sources at which a regulated substance is present in more than a threshold quantity to prepare and implement a risk management program to detect and prevent or minimize accidental releases of such substances from the stationary source, and to provide a prompt emergency response to any such releases in order to protect human health and the environment.

14. Pursuant to Section 112(r)(7) of the Act, 42 U.S.C. § 7412(r), the Administrator initially promulgated a list of regulated substances, with threshold quantities for applicability, at 59 Fed. Reg. 4478 (January 31, 1994), which is codified, as amended, at 40 C.F.R. § 68.130 of CAPP.

15. The Administrator of EPA (the Administrator) may assess a civil penalty of up to \$51,796 per day of violation up to a total of \$414,364 for CAA violations that occurred after November 2, 2015 under Section 113(d)(1) of the CAA, 42 U.S.C. § 7413(d)(1), and 40 C.F.R. Part 19.

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

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

40 C.F.R. Part 68: Chemical Accident Prevention Provisions

17. Pursuant to Section 112(r) of the Act, 42 U.S.C. § 7412(r), the Administrator promulgated “Accidental Release Prevention Requirements: Risk Management Programs Under Clean Air Act Section 112(r)(7),” 61 Fed. Reg. 31668 (June 20, 1996), which is codified at 40 C.F.R. Part 68: Chemical Accident Prevention Provisions (CAPP or Part 68). The Administrator promulgated the most recent amendment to CAPP on December 19, 2019. 84 Fed. Reg. 69834.

18. Section 112(r)(7)(E) of the Act, 42 U.S.C. § 7412(r)(7)(E), provides that after the effective date of any regulation or requirement promulgated pursuant to Section 112(r) of the Act, it shall be unlawful for any person to operate any stationary source in violation of such regulation or requirement.

a. Applicability

19. Section 68.10(a) of CAPP provides, in pertinent part, that the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 C.F.R. § 68.115, shall comply with the requirements of CAPP no later than the date on which a regulated substance is first present above a threshold quantity in a process.

20. Section 68.3 of CAPP provides that “regulated substance” means any substance listed pursuant to Section 112(r)(3) of the Act at 40 C.F.R. § 68.130.

21. Section 68.115(a) of CAPP provides that “a threshold quantity of a regulated substance listed in 40 C.F.R. § 68.130 is present at a stationary source if the total quantity of the regulated substance contained in a process exceeds the threshold.”

22. Table 1 at Section 68.130(a) of CAPP lists chlorine as a regulated toxic substance with a threshold quantity of 2,500 pounds (lbs).

23. Section 68.3 of CAPP provides that “process” means “any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities.” For purposes of this definition, a single process includes “any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release.”

24. Section 68.3 of CAPP defines “covered process” as “a process that has a regulated substance present in more than a threshold quantity as determined under 40 C.F.R. § 68.115.”

25. Section 68.10(i) of CAPP provides, in pertinent part, that a covered process is subject to Program 3 requirements if the process does not meet the requirements of 40 C.F.R. § 68.10(g) and if either of the following conditions is met: the process is in NAICS code 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, or 32532; or the process is subject to the U.S. Occupational Safety and Health Administration (OSHA) process safety management standard, 29 C.F.R. § 1910.119.

26. Section 68.12(d) of CAPP identifies CAPP requirements that the owner or operator of a stationary source with a process subject to Program 3 shall meet, which include, among other provisions, requirements regarding the Program 3 prevention program (Subpart D of Part 68) per Section 68.12(d)(3).

b. Process Safety Information

27. Under 40 C.F.R. § 68.65(d)(2) of CAPP, “[t]he owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.”

c. Process Hazard Analysis

28. 40 C.F.R. § 68.67(e) of CAPP requires that the owner or operator shall establish a system to promptly address the team’s findings and recommendations [in the Process Hazard Analysis (PHA)]; assure that the recommendations are resolved in a timely manner and that resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; and communicate the actions to operating, maintenance, and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.

d. Operating Procedures

29. Under 40 C.F.R. § 68.69(a) of CAPP “[t]he owner or operator shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements.” 40 C.F.R. § 68.69(a)(3) specifies that written operating procedures must address safety and health considerations including: (i) “[p]roperties of, and hazards presented by, the chemicals used in the process;” (ii) “[p]recautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment;” (iii) “[c]ontrol measures to be taken if physical contact or airborne exposure occurs;” (iv) “[q]uality control for raw materials and control of hazardous chemical inventory levels;” and (v) “[a]ny special or unique hazards.” 40 C.F.R. § 68.69(a)(3)(i)–(v).

40 C.F.R. § 68.69(a)(4) also requires that the written operating procedures address “[s]afety systems and their functions.”

e. Training

30. Under 40 C.F.R. § 68.71(b) of CAPP, a facility must provide refresher training “at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process.”

31. 40 C.F.R. § 68.71(c) of CAPP requires that an “owner or operator shall prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.”

f. Mechanical Integrity

32. 40 C.F.R. § 68.73(b) of CAPP requires that an “owner or operator shall establish and implement written procedures to maintain the on-going integrity of process equipment.”

33. 40 C.F.R. § 68.73(d)(4) of CAPP requires the owner or operator to “document each inspection and test that has been performed on process equipment.” Among other things, the documentation shall identify “the results of the inspection or test.”

g. Compliance Audits

34. 40 C.F.R. § 68.79(a) of CAPP requires an owner or operator to certify that they have evaluated compliance with the provisions of 40 C.F.R. Part 68, Subpart D, “at least every three years to verify that procedures and practices developed under this subpart are adequate and being followed.”

35. Under 40 C.F.R. § 68.79(c) of CAPP, “[a] report of the findings of the audit shall be developed.”

36. Under 40 C.F.R. § 68.79(d) of CAPP, “[t]he owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.”

h. Incident Investigation

37. 40 C.F.R. § 68.81(f) of CAPP requires that an incident “report shall be reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable.”

Factual Allegations and Alleged Violations

38. The MCSD operates a water chlorination process (the “Facility’s Process”) at its J.B. Gifford Wastewater Treatment Plant located at 1100 E. 8th Street, Michigan City, Indiana 46360 (the Facility).

39. On July 27, 2021, EPA conducted an announced inspection of the Facility.

40. The Facility maintains a maximum inventory of 14,000 pounds of chlorine, a regulated substance, as a liquified compressed gas in 1-ton cylinders.

41. The Facility’s Process is an activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities and is thus a “process,” as that term is defined at 40 C.F.R. § 68.3 of CAPP.

42. The Facility’s maximum inventory of 14,000 pounds of chlorine exceeds the threshold quantity of 2,500 pounds for chlorine present at the Facility, as determined under 40 C.F.R. § 68.115 of CAPP.

43. The Facility’s Process is a “covered process,” as that term is defined at 40 C.F.R. § 68.3 of CAPP.

44. The Facility's worst-case release assessment conducted under Subpart B of Part 68 and 40 C.F.R. § 68.25 of CAPP determines that the distance to the toxic endpoint for chorine (0.0087 mg/L, as listed in Appendix A of Part 68) is greater than the distance to any public receptor. The Facility therefore does not meet the eligibility requirements of 40 C.F.R. § 68.10(g) for Program 1.

45. The Facility's covered process is subject to the Occupational Safety and Health Administration (OSHA) process safety management standard, 29 C.F.R. § 1910.119.

46. Based on Paragraphs 40 through 45, the Facility's Process is a covered process that is subject to requirements of CAPP in accordance with 40 C.F.R. § 68.10(a) of CAPP and the requirements of Program 3 in accordance with 40 C.F.R. § 68.10(i).

47. The MCSD provided numerous documents prior to the July 27, 2021 inspection. These documents were related to various aspects of the Facility's Program 3 requirements under CAPP.

48. On March 1, 2022, EPA sent an Expedited Settlement Agreement (ESA) and Finding of Violation (FOV) listed in an ESA to the MCSD, dated March 1, 2022, for violations of the regulations listed below in Paragraphs 51 through 82.

49. On March 21, 2022, representatives of EPA and the MCSD discussed the March 1, 2022 ESA and agreed to resolve the allegations through this Order instead of through the mechanisms presented in the March 1, 2022 ESA.

50. On April 4, 2022, the MCSD submitted to EPA documentation of actions taken and to be taken by the MCSD to address the alleged violations in the March 1, 2022 ESA.

a. Count 1: Process Safety Information

51. The statements in Paragraphs 1 through 50 are hereby incorporated by reference as if set forth in full.

52. Under recognized and generally accepted good engineering practices, pipes containing chlorine and sulfur dioxide should be labeled.

53. During the July 27, 2021 inspection, EPA inspectors observed that the MCSD had not labeled the different sets of pipes for chlorine and sulfur dioxide that were going underground, to distinguish the different chemicals in the pipes.

54. By failing to adequately label the pipes with the name of the chemical in the pipes and direction of flow, the MCSD did not document that equipment complies with recognized and generally accepted good engineering practices, in violation of 40 C.F.R. § 68.65(d)(2) of CAPP.

b. Count 2: Process Hazard Analysis

55. The statements in Paragraphs 1 through 50 are hereby incorporated by reference as if set forth in full.

56. The MCSD completed a PHA on September 1-2, 2016.

57. Based on documentation provided to EPA inspectors, the MCSD had not established a system to promptly address the PHA team's findings and recommendations of the September 2016 PHA. The MCSD had not assured that the recommendations would be resolved in a timely manner and documented; completed actions as soon as possible; developed a written schedule of when these actions were to be completed; nor communicated the actions to operating, maintenance, and other employees whose work assignments are in the Facility's Process and who may be affected by the recommendations.

58. By failing to take the measures following the PHA as described in Paragraph 57, the MCSD was in violation of 40 C.F.R. § 68.67(e) of CAPP.

c. Count 3: Operating Procedures

59. The statements in Paragraphs 1 through 50 are hereby incorporated by reference as if set forth in full.

60. Based on documentation provided to EPA inspectors, the Facility's disinfection process operating procedures do not incorporate information regarding safety and health considerations, safety systems and their functions.

61. By failing to include safety and health considerations as well as safety systems and their functions in the written operating procedures, the MCSD failed to address the elements listed in 40 C.F.R. § 68.69(a)(3) and (4) of CAPP.

d. Count 4: Training

62. The statements in Paragraphs 1 through 50 are hereby incorporated by reference as if set forth in full.

63. EPA inspectors inquired about whether the MCSD provided the mandatory refresher training to employees involved in operating the Facility's Process and requested documents required under 40 C.F.R. § 68.71(c) of CAPP.

64. The MCSD did not provide EPA inspectors with documents reflecting compliance with 40 C.F.R. § 68.71(b) of CAPP, as required by 40 C.F.R. § 68.71(c).

65. The MCSD personnel made statements to EPA inspectors indicating that the MCSD did not provide the required refresher training to each employee involved in operating the Facility's Process to assure that the employee understands and adheres to the current operating procedures of the Facility's Process.

66. The MCSD failed to produce a record of the training, containing the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

67. The MCSD violated 40 C.F.R. § 68.71(b) of CAPP by failing to provide the required refresher training to each employee involved in operating the Facility's Process.

68. The MCSD violated 40 C.F.R. § 68.71(c) of CAPP by failing to produce a record of the required training, containing the identity of each employee, the date of training, and the means used to verify that the employee understood the training.

e. Count 5: Mechanical Integrity

69. The statements in Paragraphs 1 through 50 are hereby incorporated by reference as if set forth in full.

70. EPA inspectors reviewed documents the MCSD provided regarding mechanical integrity. In those documents, the MCSD did not establish and implement written procedures to maintain the on-going integrity of the chlorine and sulfur dioxide underground pipelines.

71. By failing to establish and implement written procedures to maintain the on-going integrity of chlorine and sulfur dioxide underground pipelines, the MCSD violated 40 C.F.R. § 68.73(b) of CAPP.

72. In the Facility's annual preventative maintenance reports, the MCSD identified process equipment on which the mechanical integrity inspection or test was performed. However, the MCSD did not document the results for each piece of process equipment identified in inspections and tests.

73. By failing to document the results for each piece of process equipment identified in inspections and tests the MCSD violated 40 C.F.R. § 68.73(d)(4) of CAPP.

f. Count 6: Compliance Audits

74. The statements in Paragraphs 1 through 50 are hereby incorporated by reference as if set forth in full.

75. The MCSD completed a compliance audit pursuant to 40 C.F.R. § 68.79 of CAPP on November 9, 2017.

76. The MCSD then failed to verify that procedures and practices developed are adequate and are being followed within 3 years of the 2017 audit. MCSD completed its next compliance audit on July 23, 2021, more than 3 years after the 2017 audit.

77. By failing to complete a compliance audit every three years, the MCSD violated 40 C.F.R. § 68.79(a) of CAPP.

78. Based upon the 2017 audit report provided to EPA, several findings had action items listed, but MCSD did not provide information verifying that those items were addressed and completed.

79. By failing to document completion of all action items of the 2017 audit report, MCSD failed to document that the deficiencies have been corrected, in violation of 40 C.F.R. § 68.79(d) of CAPP.

g. Count 7: Incident Investigation

80. The statements in Paragraphs 1 through 50 are hereby incorporated by reference as if set forth in full.

81. Two incidents took place, one on August 26, 2019, when MCSD identified a leak in the Chlorine and Sulfur Dioxide building, and the other on September 2, 2020 when an outlet shorted out, tripped the breaker, and burned the outlet and wiring. Representatives of the MCSD told EPA inspectors that they did not review the incident investigation reports with all affected

personnel whose job tasks are relevant to the incident findings including contract employees where applicable.

82. By failing to review the incident investigation reports with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable, MCSD violated 40 C.F.R. § 68.81(f) of CAPP.

Civil Penalty

83. Based on analysis of the factors specified in Section 113(e) of the CAA, 42 U.S.C. § 7413(e), the facts of this case, cooperation, and prompt return to compliance, Complainant has determined that an appropriate civil penalty to settle this action is \$6,600.

84. Within 30 days after the effective date of this CAFO, Respondent must pay a \$6,600 civil penalty by sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

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

The check must note Respondent's name and the docket number of this CAFO.

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

Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
r5airenforcement@epa.gov

Maria Dambriunas
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
Dambriunas.maria@epa.gov

Regional Hearing Clerk (E-19J)
U.S. Environmental Protection Agency, Region 5
r5hearingclerk@epa.gov

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

87. If Respondent does not pay timely the civil penalty, EPA may request the Attorney General of the United States to bring an action to collect any unpaid portion of the penalty with interest, nonpayment penalties and the United States enforcement expenses for the collection action under Section 113(d)(5) of the CAA, 42 U.S.C. § 7413(d)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

88. Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any overdue amount from the date payment was due at a rate established by the Secretary of the Treasury pursuant to 26 U.S.C. § 6621(a)(2). Respondent must pay the United States enforcement expenses, including but not limited to attorneys fees and costs incurred by the United States for collection proceedings. In addition, Respondent must pay a quarterly nonpayment penalty each quarter during which the assessed penalty is overdue. This nonpayment penalty will be 10 percent of the aggregate amount of the outstanding penalties and nonpayment penalties accrued from the beginning of the quarter. 42 U.S.C. § 7413(d)(5).

General Provisions

89. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: dambriunas.maria@epa.gov (for Complainant), and jmeyer@jimmeyerlaw.com (for Respondent). Respondent understands that the CAFO will become publicly available upon filing.

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

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

92. This CAFO does not affect Respondent's responsibility to comply with the CAA and other applicable federal, state and local laws. Except as provided in Paragraph 90, above, compliance with this CAFO will not be a defense to any actions subsequently commenced pursuant to federal laws administered by EPA.

93. Respondent certifies that it is complying fully with the CAPP consistent with the Compliance Plan in the concurrent Administrative Consent Order.

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

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

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

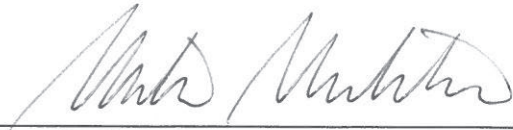
97. Each party agrees to bear its own costs and attorney's fees in this action.

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

Michigan City Sanitary District, Respondent

08-16-22

Date



Milorad Milatovic
General Manager

United States Environmental Protection Agency, Complainant

**MICHAEL
HARRIS**

Digitally signed by
MICHAEL HARRIS
Date: 2022.08.26
12:34:43 -05'00'

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 5

Consent Agreement and Final Order
In the Matter of: Michigan City Sanitary District
Docket No. CAA-05-2022-0023

Final Order

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

Date

ANN COYLE Digitally signed by ANN
COYLE
Date: 2022.09.01
13:29:15 -05'00'

Ann L. Coyle
Regional Judicial Officer
U.S. Environmental Protection Agency
Region 5

Consent Agreement and Final Order
In the matter of: Michigan City Sanitary District
Docket Number: **CAA-05-2022-0023**

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, docket number CAA-05-2022-0023, which was filed on September 2, 2022, in the following manner to the following addressees:

Copy by E-mail to Respondent: Milorad Milatovic
mmilatovic@mcsan.org

Copy by E-mail to
Attorney for Complainant: Maria Dambriunas
dambriunas.maria@epa.gov

Copy by E-mail to
Attorney for Respondent: James B. Meyer
jmeyer@jimmeyerlaw.com

Copy by E-mail to
Regional Judicial Officer: Ann Coyle
coyle.ann@epa.gov

Isidra Martinez
Acting Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5