



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

JUN 16 2015

Mr. Alan Coffin  
Water Plant Supervisor  
City of Del City Water Treatment Plant  
4605 S.E. 44th St.  
Del City, OK 73115

**Re:** Complaint and Consent Agreement and Final Order  
Docket No. CAA-06-2015-3510

Dear Mr. Coffin:

Enclosed for your records is a copy of the fully executed Complaint and Consent Agreement and Final Order (Complaint and CAFO) for the Clean Air Act Section 112(r) violations found at the City of Del City Water Treatment Plant facility located in Del City, Oklahoma. Please note that if you have not yet paid the assessed penalty, payment is due no later than 30 days after the date it was signed by the Regional Judicial Officer.

If you have any questions regarding this matter, please do not hesitate to call. I may be reached by phone at (214) 665-6708 or by email at [rogers.elizabeth@epa.gov](mailto:rogers.elizabeth@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Rogers".

Elizabeth Rogers  
RMP Enforcement Officer  
Prevention and Response Branch  
USEPA - Region 6

Enclosure

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
DALLAS, TEXAS

2015 JUN 16 PM 3:18  
EPA REGION 6

FILED

IN THE MATTER OF: )

City of Del City Water Treatment Plant )

Del City, Oklahoma )

RESPONDENT )

DOCKET NO. CAA-06-2015-3510

**CONSENT AGREEMENT AND FINAL ORDER**

The Director of the Superfund Division of the, United States Environmental Protection Agency (EPA), Region 6 (Complainant), and City of Del City Water Treatment Plant (Respondent), in the above-referenced proceeding, hereby agree to resolve this matter through the issuance of this Consent Agreement and Final Order (CAFO).

**I. PRELIMINARY STATEMENT**

1. This proceeding for the assessment of civil penalties is brought by EPA pursuant to Section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d), is simultaneously commenced and concluded by the issuance of this CAFO against the Respondent pursuant to 40 C.F.R. §22.13(b), 22.18(b)(2) and (3), and 22.34.

2. For the purposes of this proceeding, the Respondent admits the jurisdictional allegations herein; however, the Respondent neither admits nor denies the specific factual allegations or conclusions of law contained in this CAFO.

3. The Respondent explicitly waives any right to contest the allegations and its right to appeal the proposed Final Order set forth therein, and waives all defenses which have been raised or could have been raised to the claims set forth in the CAFO.

4. Compliance with all the terms and conditions of this CAFO shall only resolve the Respondent's liability for civil penalties for those violations which are set forth herein.

5. The Respondent consents to the issuance of this CAFO, and to the assessment and payment of the stated civil penalty in the amount and by the method set forth in this CAFO, and the conditions specified in the CAFO.

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

7. This CAFO shall apply to and be binding upon the Respondent, its officers, directors, employees, agents, servants, authorized representatives, successors, and assigns.

## **II. STATUTORY AND REGULATORY BACKGROUND**

8. Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7), provides in pertinent part:

(A) 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.

\* \* \* \*

(B)(i) 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 operator of the sources of such releases.

\* \* \* \*

(B)(ii) The regulations under this subparagraph 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 plan 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. Such plan shall provide for compliance with the requirements of this subsection.

9. In accordance with Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7), EPA promulgated the Chemical Accident Prevention Provisions, which are codified at 40 C.F.R. Part 68. These regulations, commonly referred to as the “Risk Management Program” (RMP) regulations, contain requirements for owners or operators of stationary sources concerning the prevention of accidental chemical releases.

10. Pursuant to 40 C.F.R. § 68.10, the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process must comply with the RMP regulations.

11. Pursuant to 40 C.F.R. § 68.12(d), the owner or operator of a stationary source with a process subject to the “Program 3” requirements of the RMP regulations must, among other things, comply with the prevention requirements of 40 C.F.R. Part 68, Subpart D.

12. Pursuant to Section 112(r)(7)(E) of the CAA, 42 U.S.C. § 7412(r)(7)(E), it is unlawful for any person to operate any stationary source subject to the Risk Management Program regulations and requirements in violation of such regulations and requirements.

### **III. FINDINGS OF FACT AND CONCLUSIONS OF LAW**

#### **A. PRELIMINARY ALLEGATIONS**

13. City of Del City Water Treatment Plant (Respondent) is a government/municipality authorized to do business in the State of Oklahoma.

14. "Person" is defined in Section 302(e) of the CAA, 42 U.S.C. §7602(e), as "an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency of the United States and any officer, agent, or employee thereof."

15. The Respondent is a "person" as that term is defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e), and within the meaning of Section 113(d) of the CAA, 42 U.S.C. § 7413(d).

16. The Respondent owns and/or operates a pollution control plant (North American Industrial Classification System Code 221310), located at 4605 Southeast 44<sup>th</sup> Street, Del City, Oklahoma 73115.

17. "Stationary source" is defined by Section 112(r)(2)(C) of the CAA, 42 U.S.C. §7412(r)(2)(C), and 40 C.F.R. §68.3 as meaning:

any buildings, structures, equipment, installations or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur.

18. The Respondent's facility identified in Paragraph 16 is a "stationary source" as that term is defined by Section 112(r)(2)(C) of the CAA, 42 U.S.C. §7412(r)(2)(C), and 40 C.F.R. §68.3.

19. The Respondent is the owner and/or operator of the stationary source identified in Paragraph 16.

20. Chlorine is a "regulated substance", as set forth in 40 C.F.R. §68.130.

21. Process is defined in 40 C.F.R. §68.3 meaning:

any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination or activities. For the purpose of this definition, 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, shall be considered a single process.

22. The Respondent has a Chlorine at the stationary source identified in Paragraph 16.

23. At all times relevant to this CAFO, the Respondent's Chlorine has exceeded the "threshold quantity" for [Regulated Substances], as determined by 40 C.F.R. §68.115.

24. "Covered process" is defined 40 C.F.R. §68.3 as meaning "a process that has a regulated substance present in more than a threshold quantity as determined under §68.115."

25. The process [processes] identified in Paragraphs 22 and 23 is a "covered process" as that term is defined by 40 C.F.R. §68.3.

26. The process [processes] identified in Paragraphs 22, 23, and 25 meets the requirements for Program Level 3, as set forth in 40 C.F.R. § 68.10(d), and must, among other things, comply with the prevention requirements of 40 C.F.R. Part 68, Subpart D.

27. On or about February 11, 2014, an inspection of Respondent's Facility was conducted by representatives of EPA pursuant to Section 114 of the CAA, 42 U.S.C. § 7414.

28. Section 113(d)(1) of the CAA, 42 U.S.C. §7413(d)(1) authorizes EPA to bring an administrative action for penalties that exceed \$320,000<sup>1</sup> and/or the first alleged date of violation occurred more than twelve (12) months prior to the initiation of the action, if the Administrator and the United States Attorney General jointly determine that the matter is appropriate for administrative action.

29. EPA and the U.S. Department of Justice has jointly determined that the Complainant can administratively assess a civil penalty even though the alleged violations have occurred more

---

<sup>1</sup> The maximum penalty that can be assessed (without a waiver) under Section 113 of the Clean Air Act was increased by the Civil Monetary Penalty Inflation Adjustment Rule codified at 40 C.F.R. Part 19 to \$220,000 for violations occurring between January 30, 1997 and March 15, 2004, to \$270,000 for violations occurring between March 15, 2004 and January 12, 2009, to \$295,000 for violations occurring between January 12, 2009 and December 6, 2013, and to \$320,000 for violations occurring after December 6, 2013.

than twelve (12) months prior to the initiation of the administrative action.

## **B. VIOLATIONS**

### **Count I - Failure to Adequately Document that It has Addressed PHA Findings in a Timely Manner**

30. 40 C.F.R. § 68.67(a) and (e) provide the following:

(a) The owner or operator shall perform an initial process hazard analysis (hazard evaluation) on processes covered by this part. The process hazard analysis shall be appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process. The owner or operator shall determine and document the priority order for conducting process hazard analyses based on a rationale which includes such considerations as extent of the process hazards, number of potentially affected employees, age of the process, and operating history of the process. . . .

\* \* \* \*

(e) The owner or operator [to] establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the 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; 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.

31. As noted by the inspector, the facility did not perform an initial PHA when they changed to a Program Level 3 facility or determined and document the priority order for conducting PHAs. Also, the facility have a matrix on file, however, no findings were addressed and no target/completion dates were established.

32. Therefore, the Respondent violated 40 C.F.R. § 68.67(a) and (e), by failing to perform an initial PHA and failing to document that it had completed the necessary actions to resolve the team's findings and recommendation on certain process hazard analysis finding.

### **Count II – Failure to provide records of annual certification of operating procedures**

33. 40 C.F.R. §68.69(c) states:

The owner or operator shall review the operating procedures as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources.

34. As noted by the inspector, the facility had no documentation available for verification.

35. Therefore, the respondent violated 40 C.F.R. §68.69(c) by failing to update operating procedures in a timely manner.

### **Count III – Failure to provide operator refresher training in a timely manner**

36. 40 C.F.R. §68.71(b) and (c) states:

The owner or operator shall 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 understand and adheres to the current operating procedures of the process.

\* \* \* \*

The owner or operator shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The 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.

37. As noted by the inspector, the facility have list of refresher training, however; no documentation verifying employee understood operating a process are on file.

38. Therefore, the respondent violated 40 C.F.R. §68.71(b) by failing to provide documentation of employees refresher training records of understanding the process.

### **Count IV – Failure to document mechanical integrity written procedures**

39. 40 C.F.R. §68.73(a)(b) states:

The owner or operator shall establish and implement written procedures to maintain the on-going integrity of the process equipment:

- (1) Pressure vessels and storage tanks
- (2) Piping systems (including piping components such as valves)
- (3) Relief and vent systems and devices
- (4) Emergency shutdown systems
- (5) Controls (including monitoring devices and sensors, alarms, and interlocks and,
- (6) Pumps

40. As noted by the inspector, the facility has no documentation of written procedures and not available for verification.



41. Therefore, the respondent violated 40 C.F.R. §68.73(a)(b) by failing to provide documents of written procedures.

**Count V – Failure to document employee training for process maintenance activities.**

42. 40 C.F.R. §68.73(c) states:

The owner or operator shall train each employee involved in maintaining the on-going integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner.

43. As noted by the inspector, the facility have list of trainings, however; no documentation was available for verification.

44. Therefore, the respondent violated 40 C.F.R. §68.73(c) by failing to provide documentation of employees training.

**Count VI – Failure to conduct testing and inspection in a timely manner**

45. 40 C.F.R. §68.73(d)(3) states:

The owner or operator shall conduct frequent inspections and tests of process equipment s hall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.

46. As noted by the inspector, the facility stated that they have all manufacturers' recommendations on file, however; no documentation was available for verification.

47. Therefore, the respondent violated 40 C.F.R. §68.73(d)(3) by failing to conduct recommended testing and inspections.

**Count VII – Failure to update Risk Management Plan (RMP)**

48. 40 C.F.R. §68.190(b)(5) states:

The owner or operator of a stationary source shall revise and update the RMP submitted within six months of a change that requires a revised PHA or hazard review.

49. As noted by the inspector, the facility did not review their PHA.

50. Therefore, the respondent violated 40 C.F.R. §68.190(b)(5) by failing to update RMP within a timely manner.

#### IV. TERMS OF SETTLEMENT

##### A. CIVIL PENALTY

51. For the reasons set forth above, Respondent has agreed to pay a civil penalty which has been determined in accordance with Section 113(d) of the CAA, 42 U.S.C. § 7413(d), which authorizes EPA to assess a civil penalty of up to twenty-five thousand dollars (\$25,000)<sup>2</sup> per day for each violation of the CAA. Upon consideration of the entire record herein, including the Findings of Fact and Conclusions of Law, which are hereby adopted and made a part hereof, and upon consideration of the size of the business, the economic impact of the penalty on the business, the violator's full compliance history and good faith efforts to comply, the duration of the violation, payment by the violator of penalties previously assessed for the same violation, the economic benefit of noncompliance, the seriousness of the violation, and other factors as justice may require, it is **ORDERED** that Respondent be assessed a civil penalty in the amount of **FORTY-FIVE THOUSAND SIX HUNDRED DOLLARS AND 00/00 (\$ 45,600.00)**

52. Within thirty (30) days of the effective date of this CAFO, the Respondent shall pay the assessed civil penalty by certified check, cashier's check, or wire transfer, made payable to "Treasurer, United States of America, EPA - Region 6". Payment shall be remitted in one of three (3) ways: regular U.S. Postal mail (including certified mail), overnight mail, or wire transfer. For regular U.S. Postal mail, U.S. Postal Service certified mail, or U.S. Postal Service express mail, the check(s) should be remitted to:

---

<sup>2</sup> The maximum \$25,000 per day penalty was increased by the Civil Monetary Penalty Inflation Adjustment Rule codified at 40 C.F.R. Part 19 to \$27,500 for violations occurring between January 30, 1997 and March 15, 2004, to \$32,500 for violations occurring between March 15, 2004 and January 12, 2009, and to \$37,500 for violations occurring after January 12, 2009.

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

For overnight mail (non-U.S. Postal Service, e.g. Fed Ex), the check(s) should be remitted to:

U.S. Bank  
Government Lockbox 979077, U.S. EPA Fines & Penalties  
1005 Convention Plaza  
SL-MO-C2-GL  
St. Louis, MO 63101  
Phone No. (314) 418-1028

For wire transfer, the payment should be remitted to:

Federal Reserve Bank of New York  
ABA = 021030004  
Account = 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" with a phone number of (412) 234-4381.

**PLEASE NOTE: Docket number CAA-06-2015-3510 shall be clearly typed on the check, or other method of payment, to ensure proper credit.** If payment is made by check, the check shall also be accompanied by a transmittal letter and shall reference the Respondent's name and address, the case name, and docket numbers of the CAFO. If payment is made by wire transfer, the wire transfer instructions shall reference the Respondent's name and address, the case name, and docket number of the CAFO. The Respondent shall also send a simultaneous notice of such payment, including a copy of the check and transmittal letter, or wire transfer instructions to the following:

Elizabeth Rogers  
RMP Enforcement Officer  
Superfund Prevention and Response Branch (6SF-PC)  
U.S. EPA, Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

Lorena Vaughn  
Regional Hearing Clerk (6RC-D)  
U.S. EPA, Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

The Respondent's adherence to this request will ensure proper credit is given when penalties are received by EPA and acknowledged in the Region.

53. The Respondent agrees not to claim or attempt to claim a federal income tax deduction or credit covering all or any part of the civil penalty paid to the United States Treasurer.

54. If Respondent fails to submit payment within thirty (30) days of the effective date of this Order, Respondent may be subject to a civil action to collect any unpaid portion of the assessed penalty, together with interest, handling charges and nonpayment penalties as set forth below.

55. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, unless otherwise prohibited by law, EPA will assess interest 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. Interest on the civil penalty assessed in this CAFO will begin to accrue thirty (30) days after the effective date of the CAFO and will be recovered by EPA on any amount of the civil penalty that is not paid by the respective due date. 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). Moreover, the costs of the Agency's administrative handling of overdue debts will be charged and assessed monthly throughout the period the debt is overdue. *See* 40 C.F.R. § 13.11(b).

56. EPA will also 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) day period that the penalty remains unpaid. In addition, a penalty charge of up to six percent per year will be assessed monthly on any portion of the debt which remains delinquent more than ninety (90) days. *See* 40 C.F.R. § 13.11(c). Should a penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. *See* 31 C.F.R. § 901.9(d). Other penalties for failure to make a payment may also apply.

57. Pursuant to Section 113(d)(5) of the CAA, 42 U.S.C. § 7413(d)(5), any person who fails to pay on a timely basis a civil penalty ordered or assessed under this section shall be required to pay, in addition to such penalty and interest, the United States enforcement expenses, including but not limited to, attorneys fees and costs incurred by the United States for collection proceedings, and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be 10 percent of the aggregate amount of such person's outstanding penalties and nonpayment penalties accrued as of the beginning of each quarter.

58. This CAFO is considered a "prior violation" for the purpose of demonstrating a "history of noncompliance" under the Clean Air Act Stationary Source Penalty Policy and the Combined Enforcement Policy for Clean Air Act Sections 112(r)(1), 112(r)(7), and 40 C.F.R. Part 68 (June 2012).

**B. RETENTION OF ENFORCEMENT RIGHTS**

59. The EPA does not waive any rights or remedies available to EPA for any other violations by the Respondent of Federal or State laws, regulations, or permitting conditions.

60. Nothing in this CAFO shall relieve the Respondent of the duty to comply with all applicable provisions of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and 40 C.F.R. Part 68.

61. Nothing in this CAFO shall limit the power and authority of EPA or the United States to take, direct, or order all actions to protect public health, welfare, or the environment, or prevent, abate or minimize an actual or threatened release of hazardous substances, pollutants, contaminants, hazardous substances on, at or from the Respondent's facility. Furthermore, nothing in this CAFO shall be construed to prevent or limit EPA's civil and criminal authorities, or that of other Federal, State, or local agencies or departments to obtain penalties or injunctive relief under other Federal, State, or local laws or regulations.

62. The Complainant reserves all legal and equitable remedies available to enforce the provisions of this CAFO. This CAFO shall not be construed to limit the rights of the EPA or United States to obtain penalties or injunctive relief under the Clean air Act or under other federal or state laws, regulations, or permit conditions.

63. In any subsequent administrative or judicial proceeding initiated by the Complainant or the United States for injunctive relief, civil penalties, or other appropriate relief relating to this Facility, the Respondent shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, re judicata, collateral estoppel, issue preclusion, claim preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the Complainant or the United States in the subsequent proceeding were or should have been

brought in the instant case, except with respect to claims that have been specifically resolved pursuant to this CAFO.

64. This CAFO is not a permit, or a modification of any permit, under any federal, State, or local laws or regulations. The Respondent is responsible for achieving and maintaining complete compliance with all applicable federal, State, and local laws, regulations, and permits. The Respondent's compliance with this CAFO shall be no defense to any action commenced pursuant to any such laws, regulations, or permits, except as set forth herein. The Complainant does not warrant or aver in any manner that the Respondent's compliance with any aspect of this CAFO will result in compliance with provisions of the Clean Air Act or with any other provisions of federal, State, or local laws, regulations, or permits.

#### **C. COSTS**

65. Each party shall bear its own costs and attorney's fees. Furthermore, the Respondent specifically waives its right to seek reimbursement of its costs and attorney's fees under 5 U.S.C. § 504 and 40 C.F.R. Part 17.

#### **D. COMPLIANCE**

66. The Respondent hereby certifies that as of the date of the execution of this CAFO, that it has corrected the violations alleged herein, and is now, to the best of its knowledge, in compliance with all applicable requirements of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and 40 C.F.R. Part 68.

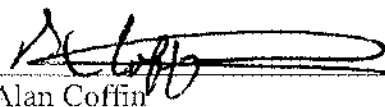
#### **E. EFFECTIVE DATE**

67. This CAFO becomes effective upon filing with the Regional Hearing Clerk.

THE UNDERSIGNED PARTIES CONSENT TO THE ENTRY OF THIS CONSENT AGREEMENT AND FINAL ORDER:

FOR THE RESPONDENT:

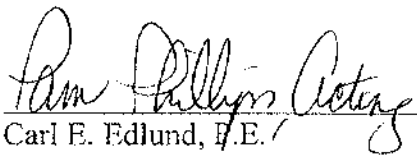
Date: 6-4-15

  
Mr. Alan Coffin  
Water Plant Supervisor  
City of Del City Water Treatment Plant

RECEIVED  
15 JUN -9 AM 7:51  
DEPARTMENT OF ENVIRONMENTAL PROTECTION & RESPONSE  
BRANCH (5315)

FOR THE COMPLAINANT:

Date: 6-10-15


  
Carl E. Edlund, P.E.  
Director  
Superfund Division  
U.S. EPA - Region 6



**V. FINAL ORDER**

Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(d), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, 40 C.F.R. Part 22, the foregoing Consent Agreement is hereby ratified. This Final Order shall not in any case affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law. This Final Order shall resolve only those causes of action alleged in the Consent Agreement. Nothing in this Final Order shall be construed to waive, extinguish or otherwise affect Respondent's (or its officers, agents, servants, employees, successors, or assigns) obligation to comply with all applicable federal, state, and local statutes and regulations, including the regulations that were the subject of this action. The Respondent is ordered to comply with the terms of settlement and the civil penalty payment instructions as set forth in the Consent Agreement. In accordance with 40 C.F.R. § 22.31(b), this Final Order shall become effective upon filing with the Regional Hearing Clerk.

Dated

6/16/15

Thomas Rucki  
Regional Judicial Officer

CERTIFICATE OF SERVICE

I hereby certify that on the 16<sup>th</sup> day of June, 2015, the original and one copy of the foregoing Consent Agreement and Final Order (CAFO) was hand delivered to the Regional Hearing Clerk, U.S. EPA - Region 6, 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2733, and a true and correct copy of the CAFO was delivered to the following by the method indicated below:

Certified Mail - Return Receipt Requested \_\_\_\_\_

Mr. Alan Coffin  
Water Plant Supervisor  
City of Del City Water Treatment Plant  
4605 S.E. 44<sup>th</sup> Street  
Del City, OK 73115

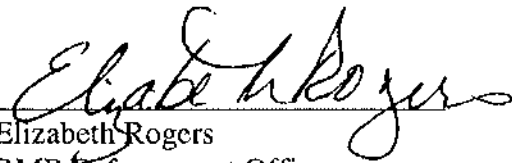


Elizabeth Rogers  
RMP Enforcement Officer  
U.S. EPA -- Region 6  
Dallas, Texas

## CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June 2015, the original of the foregoing Final Order of Clean Air Act, Section 112(r) Expedited Settlement Agreement was hand delivered to the Regional Hearing Clerk, U. S. EPA, Region 6 (6RC-D), 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2733, and that a true and correct copy was placed in the United States mail, first class postage prepaid, addressed to the following:

Mr. Alan Coffin  
Water Plant Supervisor  
City of Del City Water Treatment Plant  
4605 S.E. 44<sup>th</sup> Street  
Del City, OK 73115

  
Elizabeth Rogers  
RMP Enforcement Officer  
Prevention and Response Branch  
US EPA - Region 6