



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN - 1 2016

REPLY TO THE ATTENTION OF

LC-8J

**CERTIFIED MAIL 7011 1150 0000 2640 2372**  
**RETURN RECEIPT REQUESTED**

Mr. Ayman Assaf  
CFO  
Zidan Management Group, Inc.  
8310 Craig Street  
Indianapolis, Indiana 46250

Amendment to Consent Agreement and Final Order In the Matter of:  
Zidan Management Group, Inc., Docket No. TSCA-05-2016-0004

Dear Mr. Assaf:

Enclosed please find a copy of a fully executed Amendment to Consent Agreement and Final Order (CAFO) in Resolution of the above case. This document was filed on June 1, 2016 with the Regional Hearing Clerk.

Thank you for your continued cooperation in resolving this matter.

Sincerely,

*Pamela Grace*

Pamela Grace  
Pesticides and Toxic Compliance Section

Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**In the Matter of:**

**Zidan Management Group, Inc.  
Indianapolis, Indiana**

**Respondent**

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**Docket No. TSCA-05-2016-0004**

**Proceeding to Assess a Civil Penalty  
Under Section 16(a) of the Toxic Substances  
Control Act, 15 U.S.C. § 2615(a)**

**Amendment to Consent Agreement and Final Order**

1. This amendment modifies paragraphs 52 and 55 of the Consent Agreement and Final Order (CAFO) filed with the Regional Hearing Clerk on January 5, 2016 in the above-referenced matter.

2. Paragraph 52 of the original CAFO filed on January 5, 2016 is replaced as follows:

Respondent must complete the Hazard Abatement Project by July 15, 2016.

3. Paragraph 55 of the original CAFO filed on January 5, 2016 is replaced as follows:

Respondent must submit a Hazard Abatement Project report and lead clearance sampling report upon completion of the Hazard Abatement Project for the SEP Property by August 15, 2016. These reports must contain the following information, to the best of Respondent's knowledge:

- a. A description of the Hazard Abatement Project as completed, which includes the sampling information required in subparagraph b, below;
- b. A clearance sampling report for the SEP Property, giving sampling

locations, sample results, and documentation of analytical quality assurance/quality control;

c. Itemized costs of goods and services used to complete the Hazard Abatement Project documented by copies of invoices, purchase orders, or canceled checks that specifically identify and itemize the individual costs of the goods and services; including receipts for the cost of the lead based paint inspection conducted to identify the lead-based paint and/or lead-based paint hazards in the Property;

d. Itemized costs of services used to complete the lead clearance sampling documented by copies of invoices or canceled checks that specifically identify and itemize the costs of the services, and documentation that Respondent did not use any HUD assistance, including all HUD grants as well as Community Development Block Grants, to perform the abatement work required by this CAFO;

e. Documentation that the individuals who performed the Hazard Abatement Project and the lead clearance sampling are certified to perform such work in accordance with the state and local laws and regulations; and

f. Certification that Respondent has completed the Hazard Abatement Project and the lead clearance sampling in compliance with this CAFO

4. Except as specifically set forth herein, all provisions of the January 5, 2016

CAFO shall remain in full force and effect.

**[Signature page follows]**

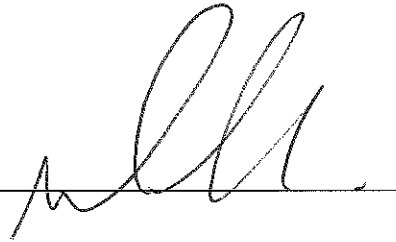
**Amendment to Consent Agreement and Final Order  
In the Matter of: Zidan Management, Inc.  
Docket No. TSCA-05-2016-0004**

**Zidan Management, Inc., Respondent**

5/17/2016

Date

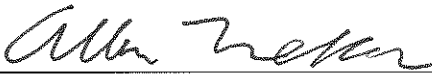
Raed Zidan  
President



**United States Environmental Protection Agency, Complainant**

5/25/16

Date

*for*   
Margaret M. Guerriero  
Director  
Land and Chemicals Division

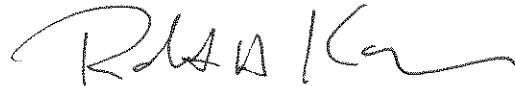
**Amendment to Consent Agreement and Final Order  
In the Matter of: Zidan Management, Inc.  
Docket No. TSCA-05-2016-0004**

**Final Order**

The foregoing Amendment to the Consent Agreement and Final Order is hereby approved and incorporated by reference into this Order, effective immediately upon filing with the Regional Hearing Clerk.

5/22/16

\_\_\_\_\_  
Date



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Robert Kaplan  
Acting Regional Administrator  
United States Environmental Protection Agency

Amendment to Consent Agreement and Final Order  
In the matter of: Zidan Management, Inc.  
Docket Number: TSCA-05-2016-0004

**CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of the foregoing **Amendment to Consent Agreement and Final Order**, which was filed on June 1, 2016, in the following manner to the following addressees:

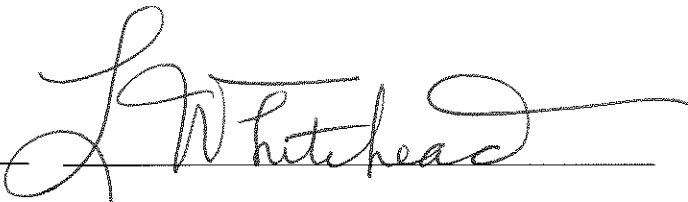
Copy by E-mail to Respondent: Ayman Assaf  
aassaf@zidans.com

Copy by E-mail to  
Attorney for Complainant: Christopher Grubb  
grubb.christopher@epa.gov

Copy by E-mail to  
Attorney for Respondent: Salma Qaddourah  
salma@zidans.com

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

Dated: June 1, 2016



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LaDawn Whitehead  
Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 5