

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY ~~2014 APR 3~~ PM 3:08
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219

IN THE MATTER OF:)
)
Federal-Mogul Ignition Company,)
)
Respondent)
)
Proceeding under Sections 3008(a) and (g))
of the Resource Conservation and)
Recovery Act as amended,)
42 U.S.C. § 6928(a) and (g))
)

CONSENT AGREEMENT
AND FINAL ORDER

Docket No. RCRA-07-2201-0016

2014 KR

2014 APR -3 PM 3:08
UNITED STATES
ENVIRONMENTAL PROTECTION
AGENCY-REGION 7

I. PRELIMINARY STATEMENT

The U.S. Environmental Protection Agency (EPA), Region 7 (Complainant) and Federal-Mogul Ignition Company (Respondent) have agreed to a settlement of this action before the filing of a complaint, and thus this action is simultaneously commenced and concluded pursuant to Rules 22.13(b) and 22.18(b)(2) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits (Consolidated Rules of Practice), 40 Code of Federal Regulations (C.F.R.) §§ 22.13(b) and 22.18(b)(2).

II. ALLEGATIONS

Jurisdiction

1. This administrative action is being conducted pursuant to Section 3008(a) and (g) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA), and the Hazardous and Solid Waste Amendments of 1984, 42 U.S.C. § 6928(a) and (g), and in accordance with the Consolidated Rules of Practice. This authority has been delegated by the Administrator of EPA to the Regional Administrator and further delegated to the Director of the Air and Waste Management Division.

2. This Consent Agreement and Final Order (CAFO) serves as notice that EPA has reason to believe that Respondent violated Section 3005 of RCRA, 42 U.S.C § 6925, the standards for the management of used oil (40 C.F.R. Part 279), and the standards for universal waste management (40 C.F.R. Part 273).

Parties

3. Complainant is the Chief of the Waste Enforcement and Materials Management Branch in the Air and Waste Management Division of EPA, Region 7, as duly delegated from the Administrator of EPA.

4. Respondent is Federal-Mogul Ignition Company, a company authorized to operate under the laws of Iowa.

Statutory and Regulatory Framework

5. When EPA determines that any person has violated or is in violation of any RCRA requirement, EPA may issue an order assessing a civil penalty for any past or current violation and/or require immediate compliance or compliance within a specified time period pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a).

6. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes a civil penalty of not more than \$25,000 per day for violations of Subchapter III of RCRA (Hazardous Waste Management). This figure has been adjusted upward for inflation pursuant to the Civil Monetary Penalties Inflation Adjustment Rule, 40 C.F.R. Part 19, so that penalties of up to \$32,500 per day are authorized for violations of Subchapter III of RCRA that occur after March 15, 2004, through January 12, 2009. For violations of Subchapter III of RCRA that occur after January 12, 2009, penalties of up to \$37,500 per day are now authorized. Based upon the facts alleged in this CAFO and upon those factors which Complainant must consider pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), as discussed in the RCRA Civil Penalty Policy issued by EPA in June 2003, the Complainant and Respondent agree to the payment of a civil penalty pursuant to Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), and to take the actions required by the Final Order, for the violations of RCRA alleged in this CAFO.

General Factual Background

7. Respondent is a corporation and authorized to conduct business within the State of Iowa. Respondent is a "person" as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

8. Respondent's facility is located at 3009 Sylvania Drive, Burlington, Iowa. This facility manufactures and assembles ignition products such as spark plugs and associated components. Respondent employs approximately 400 people at this facility but has operations worldwide.

9. At the time of the inspection, the following solid wastes were present:
 - a. Two 20-cubic-yard rolloff containers of wastewater treatment sludge, or filter cake, located in the filter cake less-than-90 day container storage area;
 - b. One 55-gallon container of copper carbon black powder located along the east wall of Building 25;
 - c. Two partially full 55-gallon containers of waste paint-related material (WPRM) located in the basement of Building 26; and
 - d. One 350-gallon container of waste sweeco rinse located in Building 25.

10. At the time of the inspection, the following hazardous waste(s) were present:
 - a. Wastewater treatment sludge, or filter cake, is F006 listed and D007 characteristic hazardous waste;
 - b. Copper carbon black powder is D005 characteristic hazardous waste;
 - c. Waste-paint related material is F003 and F005 listed and D001 and D008 characteristic hazardous waste; and
 - d. Waste sweeco rinse is D002 characteristic hazardous waste.

11. At the time of the inspection, the following used oil containers were present:
 - a. One 55-gallon container of used oil in the wastewater treatment plant;
 - b. Eight 350-gallon containers of used oil adjacent to the filter cake less-than-90-day container storage area; and
 - c. Two partially full 350-gallon containers of used oil in the main less-than-90-day storage area.

12. At the time of the inspection, the following universal waste containers were present:
 - a. Six cardboard containers of spent silver tipped fluorescent lamps, high-intensity discharge mercury vapor lamps and compact fluorescent lamps in the main less-than-90-day container storage area; and
 - b. Two 1-gallon plastic containers of used batteries in the main less-than-90-day container storage area.

13. On or about March 1, 2012, Respondent notified as a Large Quantity Generator (LQG) of hazardous waste pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930. LQGs generate 1,000 kilograms per month or more of hazardous waste, or more than 1 kilogram per month of acutely hazardous waste.

14. Respondent has been assigned the following EPA ID Number: IAD000805143.

15. On or about February 29 through March 1, 2012, a contractor for EPA conducted a RCRA Compliance Evaluation Inspection (hereinafter “the inspection”) of the hazardous waste management practices at Respondent’s facility. Based on a review of the inspection report and the information provided during the inspection by facility personnel, it was determined that Respondent was operating, at the time of the inspection, as a Large Quantity Generator of hazardous waste, a Small Quantity Handler of universal waste, and used oil generator.

Violations

16. Complainant hereby states and alleges that Respondent has violated RCRA and the federal regulations promulgated thereunder, as follows:

Count 1

Failure to Conduct Adequate Hazardous Waste Determination

17. Complainant hereby incorporates the allegations contained in Paragraphs 7 through 15 above, as if fully set forth herein.

18. Pursuant to 40 C.F.R. § 262.11, a generator of solid waste, as defined at 40 C.F.R. §§ 260.10 and 261.2, must determine if the waste is a hazardous waste using methods prescribed in the regulations.

19. At the time of the inspection, it was determined that Respondent was generating waste sweeco rinse which was stored in a 350-gallon container in Building 25 near the assembly line. The waste sweeco is a D002 characteristic waste.

20. At the time of the inspection, Respondent had not conducted an adequate hazardous waste determination on the solid waste stream described in Paragraph 19 above.

21. Respondent’s failure to perform a hazardous waste determination on the above-referenced solid waste streams is a violation of 40 C.F.R. § 262.11.

Count 2

Operating as a Treatment, Storage or Disposal Facility Without a RCRA Permit or RCRA Interim Status

22. Complainant hereby incorporates the allegations contained in Paragraphs 7 through 15 above, as if fully set forth herein.

Generator Requirements

23. The regulations at 40 C.F.R. § 262.34(a) state that a generator may accumulate hazardous waste on-site for ninety (90) days or less without a permit or without interim status, provided the conditions listed in 40 C.F.R. § 262.34(a)(1)-(4) are met. If a generator fails to comply with any of these conditions, the generator is not allowed to store hazardous waste at their facility for any length of time. Respondent failed to comply with the following conditions:

Failure to describe arrangements with local emergency agencies in contingency plan

24. The regulations at 40 C.F.R. § 262.34(a)(4) require, in part, that the generator comply with the requirements of Subparts C and D in 40 C.F.R. Part 265, with 40 C.F.R. § 265.16, and with 40 C.F.R. § 268.7(a)(4).

25. Pursuant to 40 C.F.R. § 265.52(c), as found in 40 C.F.R. § 265 Subpart D, the owner or operator must prepare a contingency plan which describes arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services.

26. At the time of the inspection, the contingency plan for Respondent's facility failed to describe the arrangements agreed to by the local emergency response agencies to coordinate emergency services.

Failure to list emergency coordinator information in contingency plan

27. The regulations at 40 C.F.R. § 262.34(a)(4) require, in part, that the generator comply with the requirements of Subparts C and D in 40 C.F.R. Part 265, with 40 C.F.R. § 265.16, and with 40 C.F.R. § 268.7(a)(4).

28. Pursuant to 40 C.F.R. § 265.52(d), as found in 40 C.F.R. § 265 Subpart D, the owner or operator must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator, and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and the others must be listed in the order in which they will assume responsibility as alternates.

29. At the time of the inspection, the primary emergency coordinator was not identified and the addresses for the emergency coordinators were not listed in the most up to date contingency plan.

Failure to list and describe the emergency equipment

30. The regulations at 40 C.F.R. § 262.34(a)(4) require, in part, that the generator comply with the requirements of Subparts C and D in 40 C.F.R. Part 265, with 40 C.F.R. § 265.16, and with 40 C.F.R. § 268.7(a)(4).

31. Pursuant to 40 C.F.R. § 265.52(e), as found in 40 C.F.R. § 265 Subpart D, the owner or operator must list all the emergency equipment at the facility, and this list must be kept up to date. The plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

32. At the time of the inspection, a description of the emergency equipment, its location and capabilities was not listed in the most up to date contingency plan.

Failure to submit a copy of contingency plan to local agencies

33. The regulations at 40 C.F.R. § 262.34(a)(4) require, in part, that the generator comply with the requirements of Subparts C and D in 40 C.F.R. Part 265, with 40 C.F.R. § 265.16, and with 40 C.F.R. § 268.7(a)(4).

34. Pursuant to 40 C.F.R. § 265.53(b), as found in 40 C.F.R. § 265 Subpart D, the owner or operator must submit a copy of the contingency plan to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

35. At the time of the inspection, the facility had not submitted a copy of its contingency plan to the local emergency response agencies.

Failure to maintain training descriptions

36. The regulations at 40 C.F.R. § 262.34(a)(4) require, in part, that the generator comply with the requirements of Subparts C and D in 40 C.F.R. Part 265, with 40 C.F.R. § 265.16, and with 40 C.F.R. § 268.7(a)(4).

37. Pursuant to 40 C.F.R. § 265.16(d)(3), as found in 40 C.F.R. § 265 Subpart B, the owner or operator must maintain a written description of the type and amount of both introductory and continuing training that will be given to each person whose position at the facility is listed in the regulations and related to hazardous waste management.

38. At the time of the inspection, Respondent's records failed to include a written description of training requirements for each position related to hazardous waste management.

Satellite Accumulation

39. The regulations at 40 C.F.R. § 262.34(c)(1) allow a generator to accumulate as much as fifty-five (55) gallons of hazardous waste or one quart of acutely hazardous waste listed in § 261.33(e) in containers at or near any point of generation where waste initially accumulates, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with § 262.34(a) provided the generator comply with various handling requirements.

40. At the time of the inspection, Respondent failed to accumulate waste in a container at or near the point of generation where wastes are initially accumulated and under the control of the operator.

Emergency Preparedness

41. The regulations at 40 C.F.R. 262.34(a)(4) require, in part, that the generator comply with the requirement of Subparts C and D in 40 C.F.R. Part 265, with 40 C.F.R. § 265.16, and with 40 C.F.R. § 268.7(a)(4).

42. Pursuant to 40 C.F.R. § 265.32(c) All facilities must be equipped with specified equipment, including but not limited to portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment.

43. At the time of the inspection, Respondent failed to provide proper spill control equipment and material at the outside less-than-90-day container accumulation area.

44. Because Respondent failed to comply with the generator requirements as set forth in Paragraphs 22 through 43 above, Respondent was not authorized to store hazardous waste at its facility for any length of time, and therefore was operating a hazardous waste storage facility without a permit.

Count 3

Failure to Comply with Universal Waste Management Requirements

45. Complainant hereby incorporates the allegations contained in Paragraphs 7 through 15 above, as if fully set forth herein.

Failure to label universal waste containers

46. The regulations at 40 C.F.R. § 273.14(e) require small quantity handlers of universal waste to clearly label or mark each lamp or container or package in which such lamps

are contained with one of the following phrases: “Universal Waste—Lamp(s)” or “Waste Lamp(s),” or “Used Lamp(s).”

47. At the time of the inspection, two cardboard boxes of used lamps in the main less-than-90-day container storage area were not marked or labeled.

48. Respondent’s failure to properly label the universal waste lamp containers described above is a violation of 40 C.F.R. § 273.14(e).

Failure to date universal waste containers

49. The regulations at 40 C.F.R. § 273.15(c)(1) require small quantity handlers of universal waste to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

50. At the time of the inspection, Respondent failed to label the following containers with the earliest date that any universal waste in the container became a waste or was received:

- a. Six cardboard boxes of used lamps in the main less-than-90-day container storage area; and
- b. Two containers of used batteries in the main less-than-90-day container storage area.

51. Respondent’s failure to label the universal waste containers described above with the earliest date that any universal waste in the container became a waste or was received is a violation of 40 C.F.R. § 273.15(c)(1).

Failure to close universal waste containers

52. The regulations at 40 C.F.R. § 273.13(d)(1) require a small quantity handler of universal waste to manage lamps in a way that prevents releases by containing the lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

53. At the time of the inspection, six cardboard boxes of used lamps in the main less-than-90-day container storage area were not closed to prevent releases and breakage:

54. Respondent’s failure to close the universal waste containers described above to prevent releases and breakage is a violation of 40 C.F.R. § 273.13(d)(1).

Count 4

Failure to Comply with Used Oil Regulations

55. Complainant hereby incorporates the allegations contained in Paragraphs 7 through 15 above, as if fully set forth herein.

Failure to label used oil containers

56. The regulations at 40 C.F.R. § 279.22(c)(1) require used oil generators to label or clearly mark containers and above ground tanks used to store used oil at generator facilities with the words "Used Oil."

57. At the time of the inspection, Respondent failed to label or clearly mark the following used oil containers:

- a. One 55-gallon container of used oil in the wastewater treatment plant; and
- b. One 350-gallon container of used oil located adjacent to the filter cake less-than-90-day container storage area.

58. Respondent's failure to label the containers of used oil described above is a violation of 40 C.F.R. § 279.22(c)(1).

CONSENT AGREEMENT

59. Respondent and EPA agree to the terms of this CAFO and Respondent agrees to comply with the terms of the Final Order portion of this CAFO.

60. Respondent admits the jurisdictional allegations of this CAFO and agrees not to contest EPA's jurisdiction in this proceeding or any subsequent proceeding to enforce the terms of the Final Order portion of this CAFO set forth below.

61. Respondent neither admits nor denies the factual allegations and legal conclusions set forth in this CAFO.

62. Respondent waives its right to contest any issue of fact or law set forth above and its right to appeal the Final Order accompanying this Consent Agreement.

63. Respondent and Complainant agree to conciliate the matters set forth in this CAFO without the necessity of a formal hearing and to bear their respective costs and attorney's fees.

64. Nothing contained in the Final Order portion of this CAFO shall alter or otherwise affect Respondent's obligation to comply with all applicable federal, state, and local environmental statutes and regulations and applicable permits.

65. This CAFO addresses all civil administrative claims for the RCRA violations identified above. Complainant reserves the right to take any enforcement action with respect to any other violations of RCRA or any other applicable law.

66. The effect of settlement described in Paragraph 65 above is conditioned upon the accuracy of Respondent's representations to EPA, as memorialized in Paragraph 67, below, of this CAFO.

67. Respondent certifies that by signing this CAFO that to best of its knowledge, Respondent's facility is in compliance with all requirements of RCRA, 42 U.S.C. § 6901 *et. seq.* and all regulations promulgated thereunder.

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

69. Respondent agrees that, in settlement of the claims alleged in this CAFO, Respondent shall pay a penalty of Twelve Thousand One Hundred Ninety-One Dollars (\$12,191) as set forth in Paragraph 1 of the Final Order portion of this CAFO, below.

70. The penalty specified in the paragraph above shall represent civil penalties assessed by EPA and shall not be deductible for purposes of federal, state and local taxes.

71. Respondent consents to the issuance of this CAFO and consents for the purposes of settlement to the payment of the civil penalty cited in the immediately preceding paragraph.

72. Late Payment Provisions: Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. Interest will therefore begin to accrue on a civil or stipulated penalty if it is not paid by the date required. Interest will be assessed at a rate of the United States Treasury Tax and loan rate in accordance with 31 C.F.R. § 901.9(b). A charge will be assessed to cover the costs of debt collection including processing and handling costs and attorney fees. In addition, a non-payment penalty charge of six (6) percent per year compounded annually will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. Any such non-payment penalty charge on the debt will accrue from the date the penalty payment becomes due and is not paid. 31 C.F.R. § 901.9(c) and (d).

73. Respondent understands that failure to pay any portion of the civil penalty on the date the same is due may result in the commencement of a civil action in Federal District Court to collect said penalty, along with interest thereon at the applicable statutory rate.

Effective Date

74. This CAFO shall be effective upon filing of the Final Order by the Regional Hearing Clerk for EPA, Region 7. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

Reservation of Rights

75. Notwithstanding any other provision of this CAFO, EPA reserves the right to enforce the terms of the Final Order portion of this CAFO by initiating a judicial or administrative action under Section 3008 of RCRA, 42 U.S.C. § 6928, and to seek penalties against Respondent in an amount not to exceed Thirty-Seven Thousand Five Hundred Dollars (\$37,500.00) per day per violation pursuant to Section 3008(c) of RCRA, for each day of non-compliance with the terms of the Final Order, or to seek any other remedy allowed by law.

76. Complainant reserves the right to take enforcement action against Respondent for any future violations of RCRA and its implementing regulations and to enforce the terms and conditions of this CAFO.

77. Except as expressly provided herein, nothing in this CAFO shall constitute or be construed as a release from any claim (civil or criminal), cause of action, or demand in law or equity by or against any person, firm, partnership, entity, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous constituents, hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken from Respondent's facility.

78. Notwithstanding any other provisions of this CAFO, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority, should EPA find that the future handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at Respondent's facility may present an imminent and substantial endangerment to human health and the environment.

79. The headings in this CAFO are for convenience of reference only and shall not affect interpretation of this CAFO.

80. The provisions of this CAFO shall be deemed satisfied upon a written determination by Complainant that Respondent has fully implemented the actions required in the Final Order.

FINAL ORDER

Pursuant to the authority of Section 3008(a) and (g) of RCRA, 42 U.S.C. § 6928(a) and (g), and according to the terms of this CAFO, IT IS HEREBY ORDERED THAT:

A. Payment of Civil Penalty

1. Within thirty (30) days of the Effective Date of this CAFO, Respondent will pay a civil penalty of Twelve Thousand One Hundred Ninety-One Dollars (\$12,191).

2. Payment of the penalty shall be made by cashier or certified check, by wire transfer or on-line. The Payment shall reference the Docket Number on the check or wire transfer. If made by cashier or certified check, the check shall be made payable to "Treasurer of the United States" and remitted to:

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

Wire transfers shall be directed to the Federal Reserve Bank of New York as follows:

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"

On-line payments are available through the Department of Treasury:

www.pay.gov
Enter "sfo 1.1" in the search field.
Open the form and complete required files.

3. A copy of the check, transfer, or on-line payment confirmation shall simultaneously be sent to the following:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219; and

Kelley Catlin, Attorney
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

4. No portion of the civil penalty or interest paid by Respondent pursuant to the requirements of this CAFO shall be claimed by Respondent as a deduction for federal, state, or local income tax purposes.

B. Compliance Actions

5. Respondent shall take the following actions within the time periods specified, according to the terms and conditions specified below:

- a. Within thirty (30) days of the Effective Date, Respondent shall provide an explanation of how the waste sweeco rinse is being managed (i.e., storage, size of containers, weekly inspections, labeling, dating, closing containers).
- b. Within thirty (30) days of the Effective Date, Respondent shall provide a copy of the revised Contingency Plan complying with all parts of 40 C.F.R. Part 265 Subpart D.
- c. Within thirty (30) days of the Effective Date, Respondent shall provide evidence that a copy of the revised Contingency Plan was provided to local emergency response agencies.
- d. Within ninety (90) days of the Effective Date, Respondent shall provide documentation of proper labeling, dating and closing of universal waste containers.

6. Respondent shall submit all documentation generated to comply with the requirements as set forth in Paragraph 5 of this Final Order to the following address:

Nicole Moran, AWMD/WEMM
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

C. Parties Bound

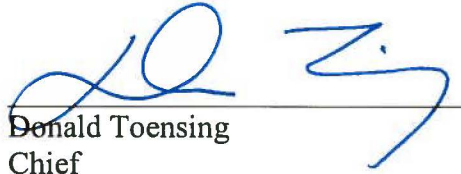
7. The Final Order portion of this CAFO shall apply to and be binding upon Respondent and Respondent's agents, successors and/or assigns. Respondent shall ensure that all contractors, employees, consultants, firms, or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this CAFO.

COMPLAINANT:

U.S. ENVIRONMENTAL PROTECTION AGENCY

3-31-14

Date



Donald Toensing
Chief

Waste Enforcement and Materials Management Branch
Air and Waste Management Division

3/27/14

Date

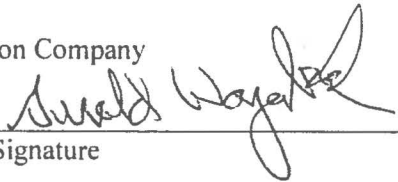


Kelley Catlin
Office of Regional Counsel

For Respondent, Federal-Mogul Ignition Company

March 26, 2014

Date


Signature

Gerald Wagenbach
Printed Name

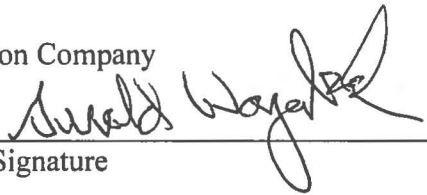
Plant Manager - Burlington
Title

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For Respondent, Federal-Mogul Ignition Company

March 26, 2014

Date


Signature

Gerald Wagenbach
Printed Name

Plant Manager - Burlington
Title

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IT IS SO ORDERED. This Final Order shall become effective upon filing by the Regional Hearing Clerk.

April 3, 2014
Date

Karina Borromeo
Karina Borromeo
Regional Judicial Officer

IN THE MATTER OF Federal-Mogul Ignition Company, Respondent
Docket No. RCRA-07-2014-0016

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Order was sent this day in the following manner to the addressees:

Copy emailed to Attorney for Complainant:

catlin.kelley@epa.gov

Copy by email to Respondent:

stephanie.o'connor@federalmogul.com

Dated: 4/4/14



Kathy Robinson
Hearing Clerk, Region 7