



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590
September 22, 2021

ELECTRONIC MAIL

Mr. Ken Mathas
President
Cornell Forge Company
666 W. 66th Street
Chicago, IL 60638
kmathas@cornellforge.com

In the Matter of: Cornell Forge Company, Docket No. EPCRA-05-2021-0007

Dear Mr. Mathas:

I have enclosed the file-stamped Consent Agreement and Final Order (CAFO) which resolves the above referenced case. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on September 22, 2021.

Under paragraph #74 of the CAFO, you must pay the civil penalty within 30 days of October 22, 2021. Your check or electronic funds transfer must display the case docket number, as provided above.

Please direct any questions regarding this case to Mr. Thomas Turner at (312) 886-6613 or email at: turner.thomas@epa.gov.

Sincerely,

CAROL
STANIEC

Digitally signed by
CAROL STANIEC
Date: 2021.09.10
11:48:46 -05'00'

Carol L. Staniec
Enforcement Officer
Pesticides and Toxics Compliance Section

Enclosure

cc: Ann Coyle, Regional Judicial Officer coyle.ann@epa.gov
Regional Hearing Clerk, R5hearingclerk@epa.gov
Thomas Turner turner.thomas@epa.gov
Branch Data Manager R5LEECAB@epa.gov

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	Docket No. EPCRA-05-2021-0007
)	
Cornell Forge Company)	Proceeding to Assess a Civil Penalty
Chicago, Cook County, Illinois,)	Under Section 325(c) of the Emergency
)	Planning and Community Right-to-Know
Respondent.)	Act of 1986, 42 U.S.C. § 11045(c)
<hr/>)	

Consent Agreement and Final Order

1. This is an administrative action commenced and concluded under Section 325(c) of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 U.S.C. § 11045(c), and Sections 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. The Complainant is the Director of the Enforcement and Compliance Assurance Division, United States Environmental Protection Agency (EPA), Region 5.
3. Respondent is Cornell Forge Company, a corporation doing business in the State of Illinois.
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). *See* 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. For the purposes of this proceeding, 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 in 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO. Respondent also consents to the issuance of this CAFO without further adjudication.

9. Respondent certifies that it is complying with Section 313 of EPCRA, 42 U.S.C. § 11023.

Statutory and Regulatory Background

10. EPA promulgated the “Toxic Chemical Release Reporting: Community Right-to-Know Rule” at 40 C.F.R. Part 372 pursuant to Sections 313 and 328 of EPCRA, 42 U.S.C. §§ 11023 and 11048.

11. Section 313(b) of EPCRA, 42 U.S.C. § 11023(b), and 40 C.F.R. § 372.22 provide that the requirements of Section 313 of EPCRA and 40 C.F.R. Part 372 apply to any facility that has 10 or more full-time employees, that falls under a Standard Industrial Classification (SIC) 3462 – Iron and Steel Forgings, and that manufactures, imports, processes, or otherwise uses a toxic chemical identified at Section 313(c) of EPCRA and listed at 40 C.F.R. § 372.65 in an amount that exceeds the threshold for reporting, as set forth in Section 313(f) of EPCRA and in 40 C.F.R. §§ 372.25, 372.27 and 372.28.

12. As set forth in Section 313(f) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25, except as provided in 40 C.F.R. §§ 372.27 and 372.28, the reporting threshold amount for a toxic chemical manufactured or processed at a facility is 25,000 pounds for calendar years including and subsequent to 1989. The reporting threshold for a toxic chemical otherwise used

at a facility is 10,000 pounds for calendar years including and subsequent to 1987.

13. EPA published the Toxic Chemical Release Inventory Reporting Form, EPA Form 9350-1 (Form R) at 40 C.F.R. § 372.85 pursuant to Section 313(g) of EPCRA, 42 U.S.C. § 11023(g).

14. All persons required to report pursuant to Section 313(b) of EPCRA must use Form R according to Section 313(a) of EPCRA, 42 U.S.C. § 11023(a) (“Form R”).

15. The Administrator of EPA may prescribe regulations as may be necessary to carry out EPCRA. *See* 42 U.S.C. § 11048.

16. Section 325(c) of EPCRA, 42 U.S.C. § 11045(c), authorizes the Administrator of EPA to assess a civil penalty of up to \$25,000 per day for each violation of Section 313 of EPCRA. The Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461 note (1990), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note (1996), required federal agencies to issue regulations adjusting for inflation the maximum civil penalties that may be assessed pursuant to each agency’s statutes. EPA may assess a civil penalty of up to \$58,328 per day for each violation of Section 313 of EPCRA that occurred after November 2, 2015, where penalties are assessed on or after January 13, 2020, pursuant to Section 325(c)(1) and (3) of EPCRA, 42 U.S.C. § 11045(c)(1) and (3), and 40 C.F.R. Part 19.

Factual Allegations and Alleged Violations

17. Respondent is a corporation doing business in the State of Illinois.

18. Respondent is a “person” as that term is defined at Section 329(7) of EPCRA, 42 U.S.C. § 11049(7).

19. At all times relevant to this CAFO, Respondent was an owner or operator of the facility located at 6666 W. 66th Street, Chicago, Illinois, 60638 (the “facility”).

20.. At all times relevant to this CAFO, Respondent had “10 or more full-time employees,” as defined at 40 C.F.R. § 372.3, and was an employer at the facility.

21. Respondent’s facility consists of buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites and which are owned or operated by the same person.

22. Respondent’s facility is included in the North American Industry Classification System (NAICS) code 33211 (Iron and Steel Forging). Respondent’s SIC code is 3462 – Iron and Steel Forging.

23. During the calendar year 2017 Respondent “manufactured” “processed” or “otherwise used”, as defined by 40 C.F.R. § 372.3, toxic chemicals identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65, in quantities exceeding the thresholds for reporting set forth at Section 313(f) of EPCRA and at 40 C.F.R. § 372.25.

24. On June 12, 2019, representatives of EPA inspected Respondent’s facility.

Count 1

25. Complainant incorporates paragraphs 1 through 24 of the CAFO as if set forth in this paragraph.

26. During calendar year 2015, Respondent’s facility processed or manufactured, as that term is defined at 40 C.F.R. § 372.3, Chromium, CAS No. 7440-47-3, identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65, in an amount which is greater than the 25,000 lbs., the threshold for reporting, as set forth in Section 313(c) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25.

27. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Illinois a Form R for Chromium for the 2015 calendar year on or

before July 1, 2016.

28. Respondent failed to submit to the Administrator of EPA and to Illinois a Form R for Chromium for the 2015 calendar year on or before July 1, 2016.

29. Respondent submitted Form R for Chromium to the Administrator and to Illinois on April 1, 2021 for calendar year 2015.

30. Respondent's failure to submit timely to the Administrator of EPA a Form R for Chromium for the 2015 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count II

31. Complainant incorporates paragraphs 1 through 24 of the CAFO as if set forth in this paragraph.

32. During calendar year 2015, Respondent's facility processed or manufactured, as that term is defined at 40 C.F.R. § 372.3, Nickel, CAS No. 7440-02-0, identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65, in an amount which is greater than the 25,000 lbs., the threshold for reporting, as set forth in Section 313(c) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25.

33. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Illinois a Form R for Nickel for the 2015 calendar year on or before July 1, 2016.

34. Respondent failed to submit to the Administrator of EPA and to Illinois a Form R for Nickel for the 2015 calendar year on or before July 1, 2016.

35. Respondent submitted Form R for Nickel to the Administrator and to Illinois on April 1, 2021 for calendar year 2015.

36. Respondent's failure to submit timely to the Administrator of EPA a Form R for Nickel for the 2015 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count III

37. Complainant incorporates paragraphs 1 through 24 of the CAFO as if set forth in this paragraph.

38. During calendar year 2016, Respondent's facility processed or manufactured, as that term is defined at 40 C.F.R. § 372.3, Chromium, CAS No. 7440-47-3, identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65, in an amount which is greater than the 25,000 lbs., the threshold for reporting, as set forth in Section 313(c) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25.

39. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Illinois a Form R for Chromium for the 2016 calendar year on or before July 1, 2017.

40. Respondent failed to submit to the Administrator of EPA and to Illinois a Form R for Chromium for the 2016 calendar year on or before July 1, 2017.

41. Respondent submitted Form R for Chromium to the Administrator and to Illinois on April 1, 2021 for calendar year 2016.

42. Respondent's failure to submit timely to the Administrator of EPA a Form R for Chromium for the 2016 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count IV

43. Complainant incorporates paragraphs 1 through 24 of the CAFO as if set forth in

this paragraph.

44. During calendar year 2016, Respondent's facility processed or manufactured, as that term is defined at 40 C.F.R. § 372.3, Nickel, CAS No. 7440-02-0, identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65, in an amount which is greater than the 25,000 lbs., the threshold for reporting, as set forth in Section 313(c) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25.

45. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Illinois a Form R for Nickel for the 2016 calendar year on or before July 1, 2017.

46. Respondent failed to submit to the Administrator of EPA and to Illinois a Form R for Nickel for the 2016 calendar year on or before July 1, 2017.

47. Respondent submitted Form R for Nickel to the Administrator and to Illinois on April 1, 2021 for calendar year 2016.

48. Respondent's failure to submit timely to the Administrator of EPA a Form R for Nickel for the 2016 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count V

49. Complainant incorporates paragraphs 1 through 24 of the CAFO as if set forth in this paragraph.

50. During calendar year 2017, Respondent's facility processed or manufactured, as that term is defined at 40 C.F.R. § 372.3, Chromium, CAS No. 7440-47-3, identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65, in an amount which is greater than the 25,000 lbs., the threshold for reporting, as set forth in Section 313(c) of EPCRA,

42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25.

51. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Illinois a Form R for Chromium for the 2017 calendar year on or before July 1, 2018.

52. Respondent failed to submit to the Administrator of EPA and to Illinois a Form R for Chromium for the 2017 calendar year on or before July 1, 2018.

53. Respondent submitted Form R for Chromium to the Administrator and to Illinois on June 12, 2019 for calendar year 2018.

54. Respondent's failure to submit timely to the Administrator of EPA a Form R for Chromium for the 2017 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count VI

55. Complainant incorporates paragraphs 1 through 24 of the CAFO as if set forth in this paragraph.

56. During calendar year 2017, Respondent's facility processed or manufactured, as that term is defined at 40 C.F.R. § 372.3, Nickel, CAS No. 7440-02-0, identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65, in an amount which is greater than the 25,000 lbs., the threshold for reporting, as set forth in Section 313(c) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25.

57. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Illinois a Form R for Nickel for the 2017 calendar year on or before July 1, 2018.

58. Respondent failed to submit to the Administrator of EPA and to Illinois a Form R

for Nickel for the 2017 calendar year on or before July 1, 2018.

59. Respondent submitted Form R for Nickel to the Administrator and to Illinois on June 12, 2019 for calendar year 2017.

60. Respondent's failure to submit timely to the Administrator of EPA a Form R for Nickel for the 2017 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count VII

61. Complainant incorporates paragraphs 1 through 24 of the CAFO as if set forth in this paragraph.

62. During calendar year 2017, Respondent's facility processed or manufactured, as that term is defined at 40 C.F.R. § 372.3, Manganese, CAS No. 7439-96-5, identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65, in an amount which is greater than the 25,000 lbs., the threshold for reporting, as set forth in Section 313(c) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25.

63. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Illinois a Form R for Manganese for the 2017 calendar year on or before July 1, 2018.

64. Respondent failed to submit to the Administrator of EPA and to Illinois a Form R for Manganese for the 2017 calendar year on or before July 1, 2018.

65. Respondent submitted Form R for Manganese to the Administrator and to Illinois on June 12, 2019 for calendar year 2017.

66. Respondent's failure to submit timely to the Administrator of EPA a Form R for Manganese for the 2017 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and

40 C.F.R. § 372.30.

Count VIII

67. Complainant incorporates paragraphs 1 through 24 of the CAFO as if set forth in this paragraph.

68. During calendar year 2017, Respondent's facility otherwise used, as that term is defined at 40 C.F.R. § 372.3, Ethylene Glycol, CAS No. 107-21-1, identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65, in an amount which is greater than the 10,000 lbs., the threshold for reporting, as set forth in Section 313(c) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25.

69. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Illinois a Form R for Ethylene Glycol for the 2017 calendar year on or before July 1, 2018.

70. Respondent failed to submit to the Administrator of EPA and to Illinois a Form R for Ethylene Glycol for the 2017 calendar year on or before July 1, 2018.

71. Respondent submitted Form R for Ethylene Glycol to the Administrator and to Illinois on June 12, 2019 for calendar year 2017.

72. Respondent's failure to submit timely to the Administrator of EPA a Form R for Ethylene Glycol for the 2017 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Civil Penalty

73. Complainant has determined that an appropriate civil penalty to settle this action is \$165,197 pursuant to Section 325(c) of EPCRA, 42 U.S.C. § 11045(c). In determining the proposed penalty amount, Complainant considered the nature, circumstances, extent, and gravity

of the violations, and with respect to the Respondent, its ability to pay, prior history of violations, economic benefit or savings resulting from the violations, and any other matters as justice may require. Complainant also considered EPA's *Enforcement Response Policy for Section 313 of the Emergency Planning and Community Right-to-Know Act (1986)* and *Section 6607 of the Pollution Prevention Act (1990)* [Amended], dated April 12, 2001.

74. Within 30 days after the effective date of this CAFO, Respondent must pay a \$165,197 civil penalty for the EPCRA violations via one of the following methods:

a) 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 "Cornell Forge Company" and the docket number of this CAFO.

b) sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

U.S. Bank
Government Lockbox 979077
U.S. EPA Fines and Penalties
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, Missouri 63101

The check must note "Cornell Forge Company" and the docket number of this CAFO.

c) electronic funds transfer, payable to “Treasurer, United States of America,” and sent to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read:
“D 68010727 Environmental Protection Agency”

In the comment or description field of the electronic funds transfer, state “Cornell Forge Company” and the docket number of this CAFO.

d) ACH electronic funds transfer, payable to “Treasurer, United States of America,” and sent to:

US Treasury REX/Cashlink ACH Receiver
ABA: 051036706
Account Number: 310006, Environmental Protection
Agency
CTX Format Transaction Code 22 –checking

In the comment area of the electronic funds transfer, state “Cornell Forge Company” and the docket number of this CAFO.

e) an on-line payment. To pay on-line, go to www.pay.gov. Use the Search Public Forms option on the tool bar and enter SFO 1.1 in the search field. Open the form and complete the required fields.

75. Respondent must send a notice of payment that states Respondent’s name and the case docket number to EPA at the following addresses when it pays the penalty:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
r5hearingclerk@epa.gov

Carol Staniec (ECP-17J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
staniec.carol@epa.gov
r5lecab@epa.gov

Thomas Turner (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
turner.thomas@epa.gov

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

77. If Respondent does not pay timely the civil penalty, EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States enforcement expenses for the collection action. The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

78. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date the payment

was due at a rate established pursuant to 31 U.S.C. § 3717. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

79. The parties' consent to service of this CAFO by e-mail at the following valid e-mail addresses: turner.thomas@epa.gov (for Complainant), and bheinrich@vedderprice.com and kmathas@cornellforge.com (for Respondent).

80. Respondent's full compliance with this CAFO shall only resolve Respondent's liability for federal administrative civil penalties under Section 325(c)(1) of EPCRA, 42 U.S.C. § 11045(c)(1), for the violations alleged in this CAFO.

81. Respondent certifies that it is now in compliance with EPCRA § 313 and its implementing regulations.

82. This 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 violations of law.

83. This CAFO does not affect Respondent's responsibility to comply with EPCRA and other applicable federal, state, and local laws.

84. This CAFO is a "final order" for purposes of EPA's Enforcement Response Policy for Section 313 of EPCRA.

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

86. Nothing herein shall waive Respondent's rights to claim an article exemption relating to future submissions of Form Rs.

87. Each person signing this 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.

88. Each party agrees to bear its own costs and attorney's fees in this action.
89. This CAFO constitutes the entire agreement between the parties.

In the Matter of:
Cornell Forge Company
Docket No. EPCRA-05-2021-0007

Cornell Forge, Respondent

Ken Mathas Digitally signed by Ken Mathas
Date: 2021.09.08 07:31:15 -05'00'

Date

Ken Mathas Digitally signed by Ken Mathas
Date: 2021.09.08 07:31:23 -05'00'

Ken Mathas
President

In the Matter of:
Cornell Forge Company
Docket No. EPCRA-05-2021-0007

United States Environmental Protection Agency, Complainant

9/22/21

Date

Harris,
Michael

Digitally signed by Harris,
Michael
Date: 2021.09.22
11:31:54 -05'00'

Michael D. Harris
Director
Enforcement and Compliance Assurance Division

In the Matter of:
Cornell Forge Company
Docket No. EPCRA-05-2021-0007

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: 2021.09.22
14:23:09 -05'00'

Ann L. Coyle
Regional Judicial Officer
United States Environmental Protection Agency
Region 5

In the matter of: Cornell Forge Company
Docket Number: [EPCRA-05-2021-0007](#)

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, which was filed on September 22, 2021, this day in the following manner to the addressees:

Copy by email to Respondent's Representative: (Delivery Receipt Requested)	Mr. Ken Mathas President Cornell Forge Company 6666 W. 66 th Street Chicago, IL 60638 kmathas@cornellforge.com
Copy by email to Attorney for Respondent:	Brett Heinrich bheinrich@vedderprice.com
Copy by email to Attorney for Complainant:	Thomas Turner Turner.thomas@epa.gov
Copy by email to Regional Judicial Officer:	Ann Coyle coyle.ann@epa.gov

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