



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 19 2020

VIA EMAIL

REPLY TO THE ATTENTION OF

Mr. Wayne D'Angelo, Partner
Kelley Drye & Warren
3050 K Street NW
Suite 400
Washington DC 20007.
dwdangelo@kelleydrye.com

Re: Consent Agreement and Final Order
Keystone Consolidated Industries, Inc.
d/b/a Keystone Steel & Wire & Liberty Steel & Wire
Docket No: **RCRA-05-2020-0026**

Dear Mr. D'Angelo:

Attached please find a copy of the signed, fully-executed Consent Agreement and Final Order (CAFO) in resolution of the above case. The original was filed with the Regional Hearing Clerk on

3/19/2020.

Your client should pay the civil penalty in the amount of \$48,258 in the manner prescribed in paragraphs 50 through 55 of the CAFO, and in the comment or description field of the electronic funds transfer, state the case title and the docket number RCRA-05-2020-0026. Your payment is due within thirty (30) calendar days of the effective date of the CAFO.

Thank you for your cooperation in resolving this matter.

If you have any questions or concerns regarding this matter, please contact Spiros Bourgikos, of my staff, at 312-886-6862.

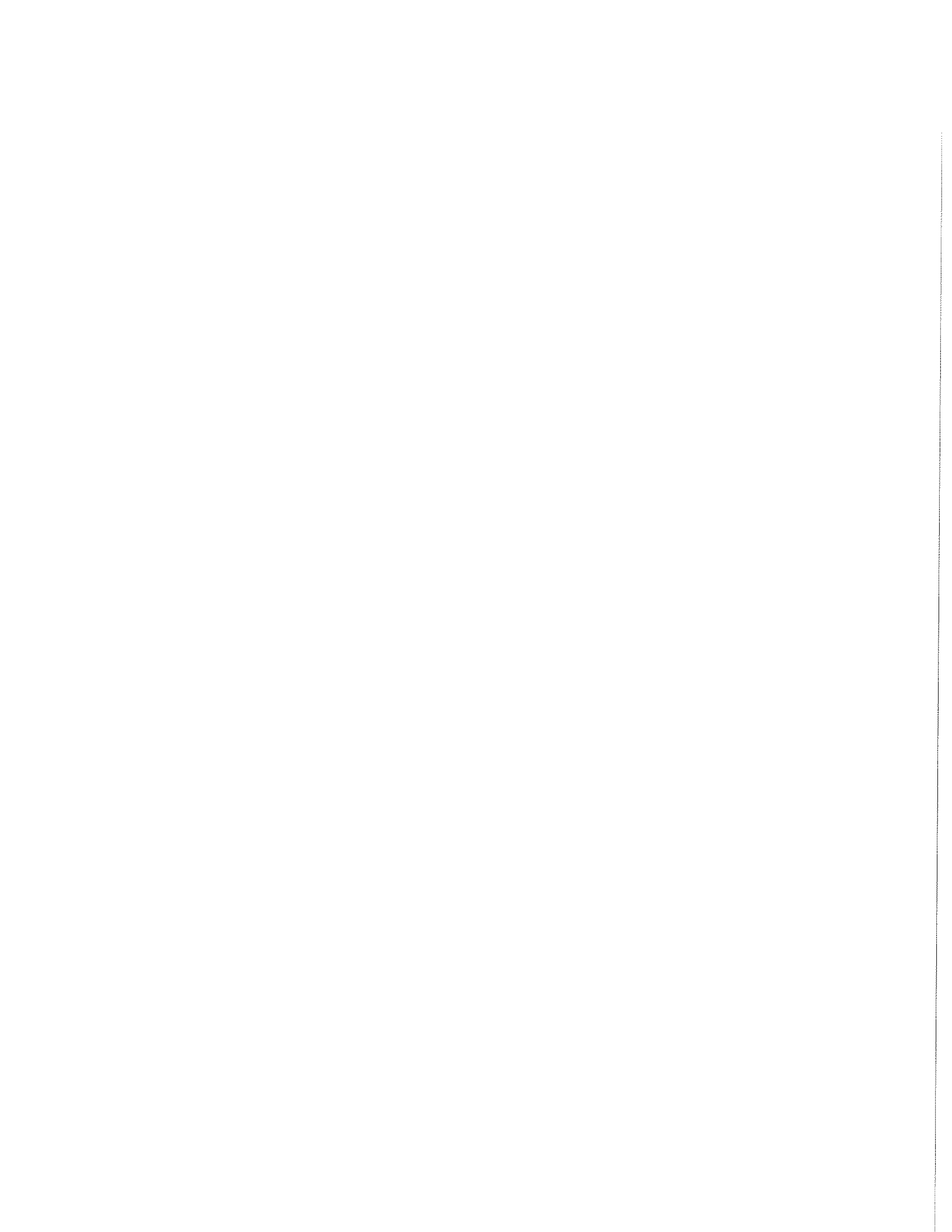
Sincerely,

A handwritten signature in black ink, appearing to read "Patrick F. Kuefler".

Patrick F. Kuefler
Acting Chief
Land & Chemicals Enforcement and
Compliance Assurance Branch

Attachment

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov) (w/attachments)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)
)
Keystone Consolidated Industries, Inc.)
d/b/a Keystone Steel & Wire and)
Liberty Steel & Wire -- Peoria)
7000 S.W. Adams St.)
Peoria, IL 61641)
)
Respondent.)
_____)

Docket No. RCRA-05-2020-0026
Proceeding to Commence and Conclude
an Action to Assess a Civil Penalty
Under Section 3008(a) of the Resource
Conservation and Recovery Act,
42 U.S.C. § 6928(a)



Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 3008(a) of the Solid Waste Disposal Act, as amended, also known as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), 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 (U.S. EPA), Region 5.
3. U.S. EPA provided notice of commencement of this action to the State of Illinois pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2) on February 8, 2019.
4. Respondent is Keystone Consolidated Industries, Inc. (d/b/a Keystone Steel & Wire and Liberty Steel & Wire – Peoria), a corporation doing business in the State of Illinois.
5. 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) per 40 C.F.R. § 22.13(b).

6. 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.

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

8. Jurisdiction for this action is conferred upon U.S. EPA by Sections 3006 and 3008 of RCRA, 42 U.S.C. §§ 6926 and 6928.

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

10. 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.

11. Respondent certifies that it is complying fully with the requirements of RCRA, 42 U.S.C. §§ 6901 – 6992k, and the regulations at 40 C.F.R. Parts 260 – 279 alleged in this CAFO.

Statutory and Regulatory Background

12. U.S. EPA has promulgated regulations, codified at 40 C.F.R. Parts 260 through 279, governing generators and transporters of hazardous waste and facilities that treat, store, and dispose of hazardous waste and used oil, pursuant to Sections 3001 – 3007, 3013 and 3014, among others, of RCRA, 42 U.S.C. §§ 6921 – 6927, 6934, and 6935.

13. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of U.S. EPA (“Administrator”) may authorize a state to administer the RCRA hazardous waste program (including the regulation of used oil) in lieu of the federal program when the Administrator finds

that the state program meets certain conditions.

14. Any violation of regulations promulgated pursuant to Subtitle C (Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6939(e) or any state provision authorized pursuant to Section 3006 of RCRA constitutes a violation of RCRA, subject to the assessment of civil penalties and issuance of compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

15. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Administrator granted the State of Illinois final authorization to administer a state hazardous waste program (including the regulation of used oil) in lieu of the federal government's base RCRA program effective on January 31, 1986. 51 Fed. Reg. 3778 (January 31, 1986).

16. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified period of time, or both. The Administrator may assess a civil penalty of up to \$99,681 per day for each violation of Subtitle C of RCRA that occurred after November 2, 2015 pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), and 40 C.F.R. Part 19.

17. Pursuant to 35 IAC § 739.122(a) and 40 CFR § 279.22(a), used oil must be managed in containers, tanks, or units subject to regulation under 35 IAC §§ 724 or 725, or 40 CFR §§ 264 or 265.

18. Pursuant to 35 IAC § 739.100 and 40 CFR § 279.1, "Used oil" means any oil that has been refined from crude oil or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities.

19. Pursuant to 35 IAC § 739.112(a) and 40 CFR § 279.12(a), used oil is prohibited from being managed in a surface impoundment or waste pile.

20. Pursuant to 35 IAC § 720.110 and 40 CFR § 260.10, a surface impoundment means “a facility or part of a facility that is a natural topographic depression, manmade excavation, or diked area formed primarily of earthen materials that is designed to hold an accumulation of liquid ...”

21. Pursuant to 35 IAC § 739.110(f) and 40 CFR § 279.10(f), “Wastewater, the discharge of which is subject to regulation under either section 402 or 307(b) of the federal Clean Water Act (including wastewaters at facilities that have eliminated the discharge of wastewater), contaminated with de minimis quantities of used oil are not subject to the requirements of . . .” the State of Illinois’ used oil regulations at 35 IAC Part 739 or U.S. EPA’s used oil regulations at 40 CFR Part 279.

22. IAC § 739.110(f) and 40 CFR § 279.10(f) define “de minimis quantities of used oils” “as small spills, leaks, or drippings from pumps, machinery, pipes, and other similar equipment during normal operations or small amounts of oil lost to the wastewater treatment system during washing or draining operations. This exception will not apply if the used oil is discarded as a result of abnormal manufacturing operations resulting in substantial leaks, spills, or other releases, or to used oil recovered from wastewaters.”

Factual Allegations and Alleged Violations

23. Respondent was and is a “person” as defined by 35 IAC § 720.110 and 40 C.F.R. § 260.10, and Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

24. Respondent is the “owner” or “operator,” as those terms are defined under 35 IAC § 720.110 and 40 C.F.R. § 260.10, of the facility located at 7000 S.W. Adams St., Peoria, IL

61641 (Facility).

25. At the Facility, Respondent manufactures steel rod, wire and fencing products, and other semi-finished wire products from scrap metal.

26. The Facility consists of land and structures, other appurtenances, and improvements on the land used for treating or storing hazardous waste and used oil.

27. At all times relevant to this CAFO, Respondent generated solid wastes, including used oil, at the Facility.

28. Respondent is a "used oil generator," as that term is defined in 35 IAC §§ 739.100 and 739.120, as well as 40 C.F.R. §§ 279.1 and 279.20.

29. On May 21 through 24, 2017, and on July 17 through July 20, 2018, U.S. EPA conducted inspections of the Facility.

30. The inspections included an examination of the Facility's Rod Mill Skimmer Basin (Skimmer Basin).

31. The Facility's Skimmer Basin is part of larger wastewater treatment and recycling system for cooling water used in the Facility's Rod Mill and Steel Mill.

32. The Skimmer Basin is a surface impoundment that receives wastewater from the Facility, including contact cooling water from the Rod Mill.

33. The Skimmer Basin contains an oleophilic skimmer and weir system to remove used oil that the cooling water washes into the Skimmer Basin.

34. The Facility also periodically removes mill scale that washes into the Skimmer Basin from the Rod Mill.

35. During the 2017 and 2018 inspections, U.S. EPA observed used oil on the surface of the Skimmer Basin, a dark staining coating the embankments of the Skimmer Basin and used oil

that had passed (not been removed or recovered) by the oleophilic skimmer and weir system.

36. Respondent is subject to the regulations promulgated pursuant to Subtitle C of RCRA, 42 U.S.C. §§ 6921 – 6939(e), or the analogous Illinois regulations as part of the applicable state hazardous waste management program for the state of Illinois.

Count 1

37. Complainant incorporates paragraphs 1 through 36 of this CAFO as though set forth in this paragraph.

38. Complainant alleges that Respondent violated 35 IAC § 739.122(a) and 40 CFR § 279.22(a) by managing cooling water from the Rod Mill and wastewater from the scrap processing area's oil-water separator containing non-de minimis amounts of used oil in a surface impoundment known as the Skimmer Basin.

39. Complainant alleges that Respondent violated 35 IAC § 739.122(a) and 40 CFR § 279.22(a) by managing cooling water and wastewater containing non-de minimis amounts of used oil in a surface impoundment known as the Skimmer Basin.

Compliance Plan

40. As part of this settlement, Respondent agrees to implement the measures outlined in paragraph 41 below to ensure that no more than de minimis quantities of used oil in cooling water from the Rod Mill, or in wastewater from other operations at the Facility, will be conveyed to or otherwise enter the Skimmer Basin.

41. Respondent will, within 180 days of the effective date of this CAFO:

- a. Develop and implement Facility-specific preventative maintenance, inspection and repair procedures that minimize to the extent practicable the risk of leaks,

spills and other releases of used oil to the Rod Mill cooling water, the scale pits, and the Skimmer Basin (including from the scrap processing area's oil-water separator).

- b. Develop and test oil separation and extraction devices, including oil/water separators, skimmers, and other devices that can remove used oil from cooling water at the Rod Mill and potentially from wastewater in other parts of the Facility.
- c. Develop and implement a plan to ensure and document that the scrap processing area's oil-water separator is functioning effectively. That plan shall include a requirement that Respondent document that the oil-water separator system was inspected and maintained by a qualified outside contractor at least annually for two (2) years following the effective date of this CAFO. That plan shall also document that Respondent will require the operator of the oil-water separator to visually inspect the oil-water separator system following qualifying precipitation events. For two (2) years following the effective date of this CAFO, Respondent's personnel shall participate in visual inspections at least quarterly.
- d. Develop and implement Facility-specific mill scale extraction procedures that minimize the reintroduction of used oil into the mill scale pits and Skimmer Basin during mill scale removal and recovery operations.
- e. Stage spill kits with appropriate solid waste (including used oil) spill and release response equipment proximate to all containers and tanks containing 55 gallons or more of oil or used oil located at the Rod Mill, mill scale pits, the Skimmer Basin, and mill scale piles.
- f. Provide communication devices to all personnel with oil, used oil and solid waste management responsibilities, including spill response.
- g. Document inspections and implementation of procedures identified in Sections 41(a), (b), (c) and (d) above.
- h. Document training of personnel with oil, used oil and solid waste management responsibilities on the use of personal protective equipment (PPE) and communication devices.

Respondent agrees to expend at least \$180,000.00 implementing the conditions set forth above and otherwise ensuring compliance with the relevant RCRA requirements.

42. Respondent will maintain inspection and documentation records, as well as records documenting any changes made based on review of records and Facility-specific procedures, onsite for three (3) years and, upon request, provide them to the U.S. EPA and the State of Illinois.

43. For all used oil tanks and containers regulated under 35 IAC § 739.122 and 40 CFR § 279.22, Respondent will document specific compliance procedures under 35 IAC § 739.122(a) through (d) and 40 CFR § 279.22(a) through (d), applicable to used oil storage and responses to used oil releases.

44. Respondent will include the items (or ensure that they are already included) in paragraphs 41 and 43 above in the Facility's Spill Prevention Control and Countermeasure (SPCC) Plan within 180 days of the effective date of this CAFO.

45. Respondent will provide a copy of the SPCC Plan to:

Spiros Bourgikos (ECR-17J)
Enforcement and Compliance Assurance Division
Land and Chemicals Enforcement and Compliance Assurance Branch
RCRA Compliance Section 1
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Andre Daugavietis (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

46. Respondent will within one (1) year of the effective date of this CAFO provide a

Report to the officials identified above on the performance of the two systems being tested to recover used oil from Rod Mill cooling water at the Rod Mill, as well as a copy of the amended Facility SPCC Plan that includes such systems.

47. Respondent will analyze for grease, oil, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) as part of (or in conjunction with) the annual groundwater analysis for the five (5) "Closed Loop" wells identified as CL1 through CL5 for three (3) years from the effective date of this CAFO.

48. Prior to the sampling and analysis, Respondent will provide the U.S. EPA (as provided in the above paragraph), with 30 days' notice of the proposed analytical methods to be used for analysis, and the proposed sampling date(s).

49. Within 60 days of Respondent's receipt of annual groundwater analysis, Respondent will provide copies of the annual groundwater analysis to:

Spiros Bourgikos (ECR-17J)
Enforcement and Compliance Assurance Division
Land and Chemicals Enforcement and Compliance Assurance Branch
RCRA Compliance Section 1
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Andre Daugavietis (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

William Sinnott
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62702

Civil Penalty

50. Pursuant to Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), and in consideration of U.S. EPA's RCRA Civil Penalty Policy, dated June 23, 2003, Complainant determined that an appropriate civil penalty to settle this action is \$48,258.00. In determining the penalty amount, Complainant considered the seriousness of the violation, good faith efforts to comply with the applicable requirements, Respondent's financial condition, and Respondent's agreement to the compliance plan specified above.

51. Respondent agrees to pay this civil penalty as set forth below.

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

[for checks sent by regular U.S. Postal Service mail]

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

[for checks sent by express mail]

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

[The check must state [the case title] and the docket number of this CAFO].

A transmittal letter stating Respondent's name, the case title and the case docket number must

accompany the payment. Respondent must send a copy of the check and transmittal letter to:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Spiros Bourgikos (ECR-17J)
Enforcement and Compliance Assurance Division
Land and Chemicals Enforcement and Compliance Assurance Branch
RCRA Compliance Section 1
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Andre Daugavietis (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

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

54. If Respondent does not timely pay the civil penalty, U.S. 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.

55. 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 payment was due at a rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). 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.

56. Within 60 days of receipt of documentation of the amended SPCC plan (paragraphs 45 and 49); performance report on the used oil recovery systems (paragraph 46); and the annual

groundwater analyses (paragraph 49), U.S. EPA must notify Respondent in writing if it identifies deficiencies (U.S. EPA will give Respondent notice with at least 60 days to correct the deficiencies).

57. If U.S. EPA exercises option a, above, Respondent may object in writing to the deficiency notice within ten (10) days of receiving the notice. The parties will have 60 days from U.S. EPA's receipt of Respondent's objection to reach an agreement. If the parties cannot reach an agreement within 60 days of U.S. EPA's receipt of Respondent's objection, the parties agree to utilize the dispute resolution procedures in paragraphs 62 and 63 below.

58. U.S. EPA's determinations of whether Respondent satisfactorily met the conditions specified in this CAFO and whether Respondent made good faith and timely efforts to meet the conditions will bind Respondent.

59. If an event occurs which causes or may cause a delay in meeting the conditions specified in this CAFO:

- a. Respondent must notify U.S. EPA in writing within ten (10) days after learning of an event which caused or may cause a delay. The notice must describe the anticipated length of the delay, its cause(s), Respondent's past, current and proposed actions to prevent or minimize the delay, and a schedule to carry out those actions. Respondent must take reasonable actions to avoid or minimize any delay.
- b. If the parties agree that circumstances beyond the control of Respondent caused or may cause a delay in meeting the conditions required by this CAFO, the parties will stipulate to an extension of time no longer than the period of delay.
- c. If U.S. EPA does not agree that circumstances beyond the control of Respondent caused or may cause a delay in meeting the conditions of this CAFO, U.S. EPA will notify Respondent in writing of its decision and any

delay in meeting the conditions of the CAFO will not be excused.

- d. Respondent has the burden of proving that circumstances beyond its control caused or may cause a delay in meeting the conditions in the CAFO.

60. Nothing in this CAFO is intended to, nor will be construed to, constitute U.S. EPA approval of any past management of any solid waste, including used oil, in the Skimmer Basin. Nor shall this CAFO be construed to constitute Respondent's admission that any solid waste, including used oil, has ever been managed in the Skimmer Basin.

61. Notwithstanding any other provision of this CAFO, nothing in this CAFO shall be construed to limit the authority of U.S. EPA to take any action against Respondent to address conditions that may present an imminent and substantial endangerment to human health or the environment. U.S. EPA reserves the right to take enforcement action against Respondent for any future violations of RCRA and the implementing regulations and to enforce the terms and conditions of this CAFO, or to take any corrective action deemed appropriate by the State or U.S. EPA.

Dispute Resolution

62. The dispute resolution procedures set forth in this Section shall be the exclusive mechanism to resolve any disputes arising under or with respect to Respondent's performance of the conditions contained in this CAFO.

63. Respondent and U.S. EPA agree to meet and confer informally and in good faith to resolve disputes arising from this CAFO. If Respondent disagrees, in whole or in part, with any decision made by U.S. EPA regarding the performance of the conditions contained in this CAFO, Respondent agrees to notify U.S. EPA, through the addressees identified in paragraph 45 above and both Respondent and U.S. EPA agree to use best efforts to informally and in good

faith resolve their dispute. If U.S. EPA disagrees, in whole or in part, with any action or inaction taken by a Respondent regarding the performance of the conditions contained in this CAFO, U.S. EPA agrees to notify Respondent, and both U.S. EPA and Respondent agree to use their best efforts to informally and in good faith resolve their dispute.

Effective Date and Termination

64. The Effective Date of this CAFO is the date that the signed Final Order is filed with the Regional Hearing Clerk.

65. This CAFO shall stay in effect for at least three (3) years from the date of filing and will be deemed terminated after receipt of the Civil Penalty and U.S. EPA's written determination that the conditions of this CAFO have been met.

66. At any point after three (3) years from the date of this CAFO, if Respondent has met all applicable requirements of the CAFO, Respondent may provide a written request to U.S. EPA to terminate its requirements under this CAFO. Such Request should summarize how the requirements of the CAFO were met and certify compliance with the CAFO. U.S. EPA will provide a response to Respondent regarding such request within 60 days of receiving it and will indicate whether U.S. EPA concurs that the conditions of this CAFO have been met.

General Provisions

67. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: daugavietis.andre@epa.gov (for Complainant), and wdangelo@kelleydrye.com (for Respondent).

68. Respondent's full compliance with this CAFO shall resolve all of Respondent's

liability for federal civil penalties under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), for the violations alleged in the CAFO.

69. This CAFO does not affect the right of U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law, other than the violations alleged in the CAFO.

70. This CAFO does not affect Respondent's responsibility to comply with RCRA and other applicable federal, state, local laws or permits.

71. This CAFO is a "final order" for purposes of 40 C.F.R. § 22.31, U.S. EPA's RCRA Civil Penalty Policy, and U.S. EPA's Hazardous Waste Civil Enforcement Response Policy (December 2003).

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

73. 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.

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

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

In the Matter of: Keystone Consolidated Industries, Inc. (d/b/a Keystone Steel & Wire and Liberty Steel & Wire – Peoria), Respondent

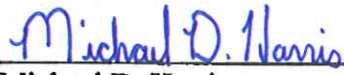
Date 3/2/20



Bert E. Downing, Jr.
Chief Financial Officer
Liberty Steel Holdings, USA Inc.

United States Environmental Protection Agency, Complainant

Date 3/12/2020



Michael D. Harris
Director
Enforcement and Compliance Assurance Division

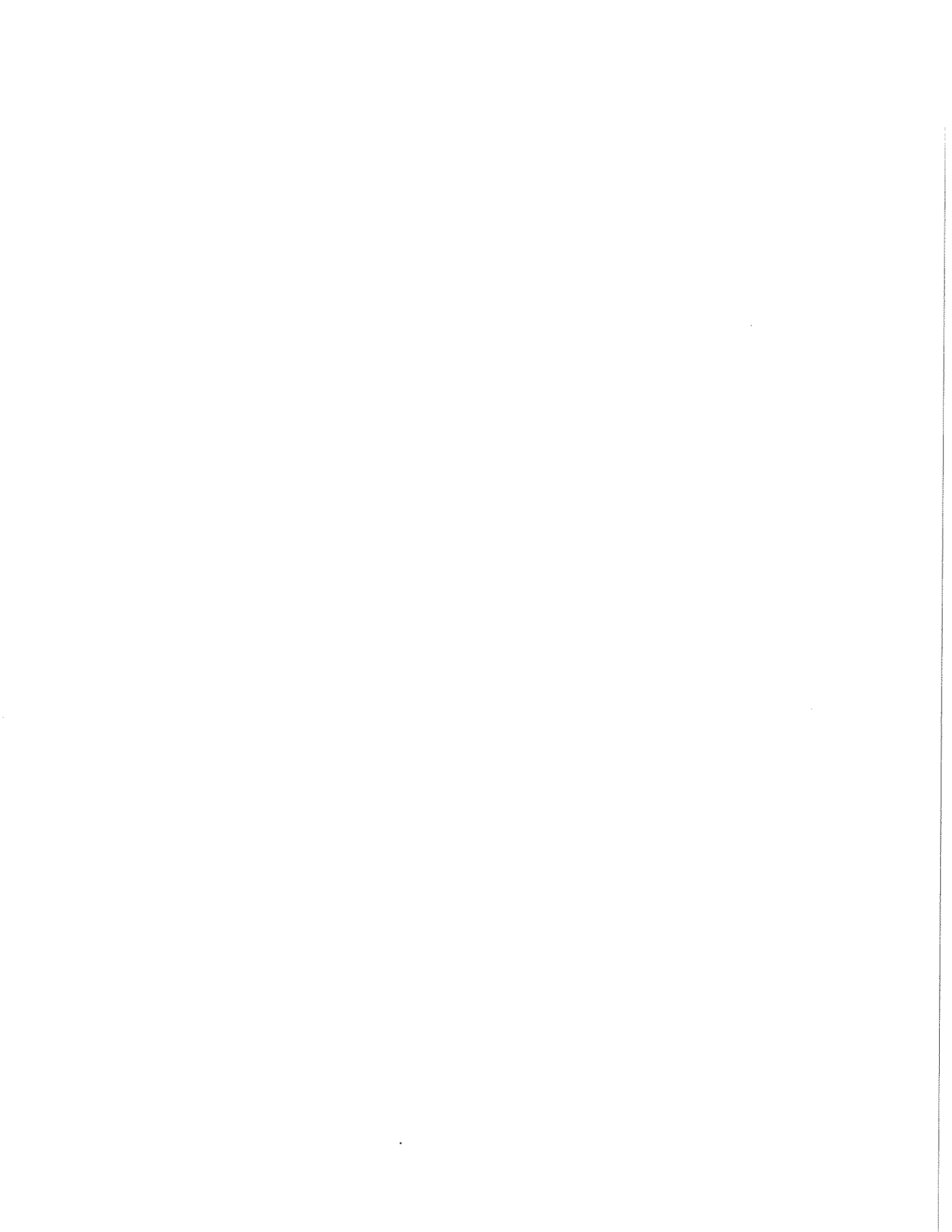
**In the Matter of:
Keystone Consolidated Industries, Inc.
Docket No. RCRA-05-2020-0026**

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.

3/17/2020
Date

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



Consent Agreement and Final Order
In the matter of: Keystone Consolidated Industries, Inc.
d/b/a Keystone Steel & Wire & Liberty Steel & Wire
Docket Number: RCRA-05-2020-0026

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, docket number **RCRA-05-2020-0026**, which was filed on 3/19/2020, in the following manner to the following addressees:

Copy by E-mail to
Attorney for Complainant: Andre Daugavietis
daugavietis.andre@epa.gov

Copy by E-mail to
EPA enforcement staff contact: Spiros Bourgikos
bourgikos.spiros@epa.gov

Copy by E-mail to
Respondent: Wayne D'Angelo
wdangelo@kelleydrye.com

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

Dated: 3/19/2020



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

