



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

JUN 28 2019

REPLY TO THE ATTENTION OF:

VIA EMAIL

Mr. Douglas Lannert
Regional General Manager
Canam Steel Corporation
9 Unytite Drive
Peru, Illinois 61354
douglas.lannert@canamgroupinc.com

Re: Consent Agreement and Final Order
Canam Steel Corporation
Docket No: **RCRA-05-2019-0011**

Dear Mr. Lannert:

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

June 26, 2019.

Please pay the civil penalty in the amount of \$52,566 in the manner prescribed in paragraphs 85 through 89 of the CAFO, and in the comment or description field of the electronic funds transfer, state the case title and the docket number RCRA-05-2019-0011. 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,

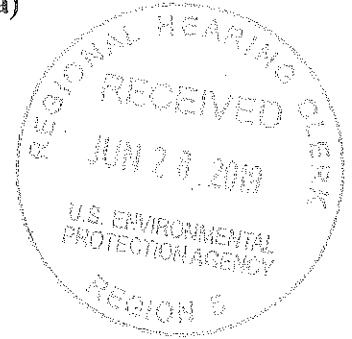
Mardi Klevs
Chief, Land and Chemicals Enforcement and Compliance Assurance Branch

Attachment

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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)	Docket No. RCRA-05-2019-0011
)	
Canam Steel Corporation)	Proceeding to Commence and Conclude
9 Unytite Drive)	an Action to Assess a Civil Penalty
Peru, Illinois,)	Under Section 3008(a) of the Resource
)	Conservation and Recovery Act,
U.S. EPA ID #: ILR 000 0667 249)	42 U.S.C. § 6928(a)
)	
Respondent.)	
<hr/>)	



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).
4. Respondent is Canam Steel Corporation, 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). 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. Respondent states that it is entering into this CAFO solely for the purpose of avoiding litigation.

7. 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

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. For purposes of this administrative action, Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

9. 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.

10. Respondent is complying fully with RCRA, 42 U.S.C. §§ 6901 – 6992k, and with the regulations at 40 C.F.R. Parts 260 - 279.

Statutory and Regulatory Background

11. 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, pursuant to Sections 3001 – 3007, and, 3013, among others, of RCRA, 42 U.S.C. §§ 6921 – 6927, and, 6934.

12. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of U.S. EPA may authorize a state to administer the RCRA hazardous waste program in lieu of the

federal program when the Administrator finds that the state program meets certain conditions. Any violation of regulations promulgated pursuant to Subtitle C (Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6939e) 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.

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

14. 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.

15. The Administrator of U.S. EPA may assess a civil penalty of up to \$25,000 per day for each violation of Subtitle C of RCRA according to Section 3008 of RCRA, 42 U.S.C. § 6928. The Federal Civil Penalties Inflation Adjustment Act of 1990, as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note (1996), required U.S. EPA to adjust its penalties for inflation on a periodic basis. Pursuant to the Civil Monetary Penalty Inflation Adjustment Rule, published at 40 C.F.R. Part 19, U.S. EPA may assess a civil penalty of up to \$37,500 per day for each violation of Subtitle C of RCRA that occurred after December 6, 2013, through November 2, 2015.

Factual Allegations and Alleged Violations

16. Respondent was and is a "person" as defined 35 IAC § 720.110, 329 40 C.F.R. § 260.10, and Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

17. Respondent is an "owner" or "operator," as those terms are defined under 35 IAC § 720.110 and 40 C.F.R. § 260.10, of a facility located at 9 Unytite Drive, Peru, Illinois (Facility).

18. Respondent purchased the Facility referenced in paragraph 17 above sometime in 2002.

19. At all times relevant to this Complaint, Respondent's Facility consisted of land and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste.

20. Respondent's Facility is a "facility," as that term is defined under 35 IAC § 720.110 and 40 C.F.R. § 260.10.

21. At all times relevant to this Complaint, Respondent used the Facility to manufacture galvanized siding, steel joists, structural steel components, and decking.

22. Respondent's manufacturing process generated paint waste, which Respondent collected in 55-gallon containers and one cubic yard super sack and stored in the hazardous waste storage area of the Facility.

23. Respondent's manufacturing process cleaning operations generated waste water, which Respondent collects in three tanks.

24. At all times relevant to this Complaint, Respondent held paint and water wastes, for temporary periods in storage before the materials were shipped from the Facility for treatment, storage, disposal, burning or incineration elsewhere.

25. Respondent characterized the wastes identified in paragraphs 22 and 23 above as D007 hazardous waste.

26. Respondent stored, transported, disposed of, or otherwise handled its hazardous waste in container and tanks as those terms are defined under 35 IAC § 720.110 and 40 C.F.R. §

260.10.

27. At all times relevant to this Complaint, Respondent's paint and cleaning water waste were "solid waste" as that term is defined under 35 IAC § 721.102 and 40 C.F.R. § 261.2.

28. At all times relevant to this Complaint, Respondent's paint and cleaning water waste were "hazardous waste" as that term is defined under 35 IAC § 720.103 and 40 C.F.R. § 261.3.

29. At all times relevant to this Complaint, Respondent's holding of paint and cleaning water waste in containers and tanks constituted hazardous waste "storage," as that term is defined under 35 IAC § 720.110] and 40 C.F.R. § 260.10.

30. Respondent is a "generator," as that term is defined under 35 IAC § 720.110 and 40 C.F.R. § 260.10.

31. Respondent generated and managed hazardous waste at the Facility after November 19, 1980.

32. On June 16, 2015, U.S. EPA conducted a Compliance Evaluation Inspection of the Facility (the inspection).

33. On June 24, 2016, U.S. EPA issued a Notice of Violation to Respondent alleging certain violations of RCRA discovered during the inspection.

34. July 26, 2016, Respondent submitted to U.S. EPA a written response to the Notice of Violation.

35. At all times relevant to this Complaint, the State of Illinois had not issued a permit to Respondent to treat, store, or dispose of hazardous waste at its Facility.

36. At all times relevant to this Complaint, Respondent did not have interim status for the treatment, storage, or disposal of hazardous waste at its Facility.

37. On or about September 3, 1999, Respondent submitted a Hazardous Waste

Notification, to U.S. EPA for the Facility.

38. In its Hazardous Waste Notification Respondent identified itself as a generator.

39. At all times relevant to this Complaint, Respondent generated during each calendar month more than 1000 kg of hazardous waste at the Facility.

Count 1: Storage of Hazardous Waste Without a Permit or Interim Status

Complainant incorporates paragraphs 1 through 39 of this CAFO as though set forth in this paragraph.

40. Pursuant to 3005(a) of RCRA, 42 U.S.C. § 6925(a) and the regulations at 40 C.F.R. Part 270, the treatment, storage, or disposal of hazardous waste by any person who has not applied for or received a permit is prohibited.

41. Pursuant to 35 IAC § 722.134(a), and 40 C.F.R. § 262.34(a), however, and subject to certain exceptions, a generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without having a permit or interim status, provided that the generator complies with all applicable conditions set forth in 35 IAC § 722.134(a), and 40 C.F.R. § 262.34(a) including, but not limited to, requirements for owners and operators in 35 IAC § 722.134.

42. The failure to comply with any of the conditions of 35 IAC § 722.134 subjects the generator of hazardous waste to the requirements of 35 IAC § 725 and the permit requirements of 35 IAC §§ 703.121, 703.180, and 705.121.

43. In order for a generator of hazardous waste to maintain its exemption from the requirement to have an operating permit or interim status, it must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins. See 35 IAC § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)].

44. At the time of the inspection, Respondent was storing hazardous waste in a super sack that was approximately one cubic yard in size and was located near the 90-day hazardous waste storage area. The super sack was not marked with the date upon which the period of accumulation of hazardous waste began.

45. In order for a generator of hazardous waste to maintain its exemption from the requirement to have an operating permit or interim status, it must always keep a container holding hazardous waste closed during storage, except when it is necessary to add or remove waste. See 35 IAC §§ 722.134(a)(1)(A) and 725.273(a) [40 C.F.R. §§ 262.34(a)(1)(i) and 265.173(a)].

46. At the time of the inspection, Respondent did not keep the super sack referenced in paragraph 44 above closed during storage, and waste was not being added or removed from the super sack while it was open.

47. Accordingly, Respondent failed to satisfy all of the conditions for maintaining its exemption from the requirement that it have an operating permit or interim status.

48. As a result of Respondent's failure to meet all of the applicable conditions for the generator exemption provided by 35 IAC § 722.134(a), Respondent became an operator of a hazardous waste treatment, storage, and disposal facility (TSDF).

49. Respondent's storage of hazardous waste without a permit or interim status violated Section 3005 of RCRA, 42 U.S.C. § 6925(a) and the requirements of 35 IAC §§ 703.121, 703.180, and 705.121 [40 C.F.R. §§ 270.1(c) and 270.10(a) and (d), and 270.13] and is subject to an order for civil penalties under Section 3008 of RCRA, 42 U.S.C. § 6928.

Count 2 Failure to Conduct Full Tank Assessment

50. Complainant incorporates paragraphs 1 through 39 of this CAFO as though set forth

in this paragraph.

51. Facilities that fail to meet the conditions for a generator permit exemption for waste storage under 35 IAC § 722.134 [40 C.F.R. § 262.34] must meet the standards for treatment, storage, and disposal facilities in 35 IAC Part 725, Subpart J [40 C.F.R. Part 265, Subpart D], which requires that all owners or operators of hazardous waste facilities comply with all requirements entitled, "Tank Systems."

52. Pursuant to 35 IAC § 725.291(a) [40C.F.R. § 265.191(a)], owners and operators of TSDFs that use tank systems to store or accumulate hazardous waste are required to obtain a written assessment, reviewed and certified by an independent professional engineer in accordance with 35 IAC § 702.126(d) that attests that each tank system at the facility has sufficient structural integrity and is acceptable for the storage of hazardous waste.

53. At the time of the inspection, Respondent was using three tanks to store hazardous waste as specified in paragraphs 24 and 26 above.

54. The three tanks were installed at the facility on an undocumented date in 2002.

55. From 2002 through the date of the inspection, Respondent stored hazardous waste in each of the three tanks.

56. From 2002 to July 11, 2005, Respondent did not have a written assessment, reviewed and certified by an independent professional engineer in accordance with 35 IAC § 702.126(d) that attests that each of the three tanks at the facility has sufficient structural integrity for the storage of hazardous waste.

57. From 2002 through the date of the inspection, Respondent did not have a written assessment, reviewed and certified by an independent professional engineer in accordance with 35 IAC § 702.126(d) that attests that each of the three tanks is acceptable for the storage of

hazardous waste specified in paragraph 23 above.

58. From July 11, 2005 to the present, Respondent's failure to have a complete written tanks assessment for each of the three tanks at the Facility violated 35 IAC § 725.291(a) [40 C.F.R. § 265.191(a)].

59. Pursuant to 35 IAC § 725.294(b)(2) [40 C.F.R. §265.194(b)(2)] owners and operators of TSDFs that use tank systems to store or accumulate hazardous waste are required to install overfill prevention controls to prevent spills and overflows from tank or secondary containment systems.

60. At time of the inspection, the three tanks were not equipped with overfill prevention controls.

61. According to Respondent, Facility staff use visual observations to determine the level of the hazardous waste in each of the three tanks.

62. Respondent's failure to equip each of the three tanks with overfill prevention controls at the Facility violated 35 IAC § 725.294(b)(2) [40 C.F.R. §265.194(b)(2)].

63. Pursuant to 35 IAC § and 725.295(a) and (b) [40 C.F.R. § 265.195(b) and (b)] owners and operators of TSDFs that use tank systems must conduct daily inspections. These inspections must be documented in the operating record of the Facility. See 35 IAC § 725.295(g) [40 C.F.R. § and 265.195(g)].

64. At the time of the inspection, Respondent stated that it inspects each of the three tanks on a daily basis.

65. Respondent also stated that it does not maintain any type of log to document these inspections.

66. Respondent failure to document the daily tank inspections violated 35 IAC § 725.295(g) [40 C.F.R. § and 265.195(g)] and is subject to an order for civil penalties under Section 3008 of RCRA, 42 U.S.C. § 6928.

Count 3 Failure to Maintaining Records and Failure to Provide Annual Training

67. Complainant incorporates paragraphs 1 through 39 of this CAFO as though set forth in this paragraph.

68. Facilities that fail to meet the conditions for a generator permit exemption for waste storage under 35 IAC § 722.134 [40 C.F.R. § 262.34] must meet the standards for treatment, storage, and disposal facilities in 35 IAC Part 724, Subpart B [40 C.F.R. Part 264, Subpart B], which requires that all owners or operators of hazardous waste facilities comply with all requirements entitled, "General Facility Standards."

69. 35 IAC § 724.116(d) [40 C.F.R. § 264.16(d)] lists the required documents and records that the owner or operator must maintain at the facility, which includes, but is not limited to:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (D)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

(3) The type and amount of both introductory and continuing training to be given to each employee filling a hazardous waste management position listed under paragraph (D)(1).

70. At the time of the U.S. EPA inspection of the Facility, Respondent failed to maintain at the facility, documents and records that described the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

71. At the time of the U.S. EPA inspection of the facility, Respondent failed to maintain at the facility, documents and records providing a written job description including the requisite skill, education, or other qualifications, and duties of Facility personnel assigned to each position at the facility related to hazardous waste management.

72. At the time of the U.S. EPA inspection of the facility, Respondent failed to maintain at the Facility, documents and records providing the type and amount of both introductory and continuing training to be given to each employee filling a position at the facility related to hazardous waste management.

73. Respondent has failed to meet the requirements referred to in paragraph 69; therefore, Respondent has violated 35 IAC § 274.116(d) [40 C.F.R. § 264.16(d)] and is subject to an order for civil penalties under Section 3008 of RCRA, 42 U.S.C. § 6928.

74. Pursuant to 35 IAC § 724.116(d) [40 C.F.R. § 264.16(d)] facility personnel must take part in an annual review of the initial of the initial hazardous waste training required by 35 IAC § 724.116(a) [40 C.F.R. § 264.16(a)].

75. During the inspection of the Facility, Respondent stated that Facility personnel have not participated in annual hazardous waste training since 2011.

76. Respondent has failed to meet the requirements referred to in paragraph 69; therefore, Respondent has violated 35 IAC § 274.116(d) [40 C.F.R. § 264.16(d)] and is subject to an order for civil penalties under Section 3008 of RCRA, 42 U.S.C. § 6928.

Count 4 Contingency Plan – Failure to Include Description of Arrangements with Local Authorities and Failure to Submit Copy of Contingency Plan to Local Emergency Response Teams

77. Complainant incorporates paragraphs 1 through 39 of this CAFO as though set forth in this paragraph.

78. Facilities that fail to meet the conditions for a generator permit exemption for waste storage under 35 IAC § 722.134 [40 C.F.R. § 262.34] must meet the standards for treatment, storage, and disposal facilities in 35 IAC Part 724, Subpart D [40 C.F.R. Part 264, Subpart D], which requires that all owners or operators of hazardous waste facilities comply with all requirements entitled, "Contingency Plan and Emergency Procedures."

79. 35 IAC § 725.52(c) [40 C.F.R. § 265.52(c)] requires that the owner or operator, in its contingency plan, must describe the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and local emergency response teams to coordinate emergency services pursuant to 35 IAC § 725.137 [40 C.F.R. § 265.37].

80. At the time of the U.S. EPA inspection of the Facility, Respondent's contingency plan failed to describe the arrangements agreed to by local police departments, fire departments, hospitals, contractors, local emergency response teams to coordinate emergency services pursuant to 35 IAC § 725.137 [40 C.F.R. § 265.37].

81. Respondent has failed to meet the requirements referred to in paragraph 79; therefore, Respondent has violated 35 IAC § 725.152(c) [40 C.F.R. § 265.52(c)] and 35 IAC § 725.153(b) [40 C.F.R. § 265.53(b)] and, therefore, is subject to an order for civil penalties under Section 3008 of RCRA, 42 U.S.C. § 6928.

82. Pursuant to 35 IAC § 725.153(b) [40 C.F.R. § 265.53(b)] requires that the owner or operator, to submit a copy of the contingency plan, to all local police departments, fire departments, hospitals, contractors and State and local emergency response teams that may be called upon to provide emergency services.

83. During the inspection at the facility, Respondent could not document that copy of the Facility's contingency plan was provided to the emergency response teams listed in paragraph 76 above.

84. Respondent has failed to meet the requirements referred to in paragraph 82; therefore, Respondent has violated 35 IAC § 725.153(b) [40 C.F.R. § 265.53(b)] and therefore, is subject to an order for civil penalties under Section 3008 of RCRA, 42 U.S.C. § 6928.

Civil Penalty

85. Pursuant to Section 3008(a) (3) of RCRA, 42 U.S.C. § 6928(a)(3), Complainant determined that an appropriate civil penalty to settle this action is fifty-two thousand five hundred sixty-six dollars (\$52,566). In determining the penalty amount, Complainant took into account the seriousness of the violation and Respondent's good faith efforts to demonstrate and achieve compliance with the applicable requirements. Complainant also considered U.S. EPA's RCRA Civil Penalty Policy, dated June 23, 2003.

86. Within 30 days after the effective date of this CAFO, Respondent must pay a \$52,566 civil penalty for the RCRA violations by 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
SWIFT address FRNYUS33
33 Liberty Street
New York, NY 10045
Field Tag 4200 of the Fedwire message is
"D68010727 Environmental Protection Agency"

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

88. 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.

89. 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.

General Provisions

90. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: nagle.ricahrd@epa.gov (for Complainant), and douglas.lannert@canamgroupinc.com (for Respondent). The parties waive their right to service by the methods specified in 40 C.F.R. § 22.6. 91.

91. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in the CAFO.

92. 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.

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

94. 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).

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

96. 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.

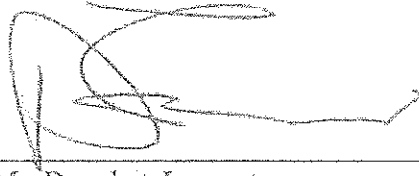
97. Each party agrees to bear its own costs and attorney's fees in this action.

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

Canam Steel Corporation, Respondent

5-23-19

Date



Mr. Douglass Lannert
Regional General Manager
Canam Steel Corporation

United States Environmental Protection Agency, Complainant

6/21/2019

Date



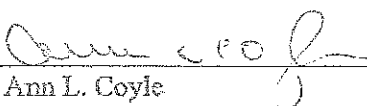
Michael D. Harris
Acting Division Director
Enforcement and Compliance Assurance Division

In the Matter of:
Canam Steel Corporation
Docket No. RCRA-05-2019-0011

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.

6/28/19
Date


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

Consent Agreement and Final Order
In the matter of: Canam Steel Corporation
Docket Number: **RCRA-05-2019-0011**

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, docket number **RCRA-05-2019-0011**, which was filed on *June 28, 2019*, in the following manner to the following addressees:

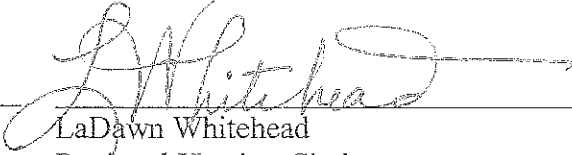
Copy by E-mail to
Attorney for Complainant: Richard Nagle
nagle.richard@epa.gov

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

Copy by E-mail to
Respondent: Douglas Lannert
douglas.lannert@canamgroupinc.com

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

Dated: *June 28, 2019*


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