



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

SEP 29 2011

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL 7009 1680 0000 7644 7966
RETURN RECEIPT REQUESTED

Mark D. Pawelski
Executive Vice President, Operations
Daubert Chemical Company, Inc.
4700 S. Central Avenue
Chicago, Illinois 60638

Re: Daubert Chemical Company, Inc.
EPA ID No.: ILD 005 150 750
Consent Agreement and Final Order
Docket No.: RCRA- RCRA-05-2011-0015

Dear Mr. Pawelski,

Enclosed, please find one of two original signed copies of a fully executed Consent Agreement and Final Order (CAFO) in resolution of the referenced case. We filed the originals with the Regional Hearing Clerk on September 29, 2011

Please pay the civil penalty of \$9,000.00 in accordance with paragraph 38 of this CAFO, and reference your check with the number BD 2751142R015 and Docket Number RCRA-RCRA-05-2011-0015. Also, enclosed is a *Notice of Securities and Exchange Commission Registrant's Duty to Disclose Environmental Legal Proceedings*.

Thank you again for your cooperation in resolving this matter.

Sincerely,

Mary S. Setnicar
Acting Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (w/ CAFO)

NOTICE OF SECURITIES AND EXCHANGE COMMISSION REGISTRANTS' DUTY TO DISCLOSE ENVIRONMENTAL LEGAL PROCEEDINGS

Securities and Exchange Commission regulations require companies registered with the SEC (e.g., publicly traded companies) to disclose, on at least a quarterly basis, the existence of certain administrative or judicial proceedings taken against them arising under Federal, State or local provisions that have the primary purpose of protecting the environment. Instruction 5 to Item 103 of the SEC's Regulation S-K (17 CFR 229.103) requires disclosure of these environmental legal proceedings. For those SEC registrants that use the SEC's "small business issuer" reporting system, Instructions 1-4 to Item 103 of the SEC's Regulation S-B (17 CFR 228.103) requires disclosure of these environmental legal proceedings.

If you are an SEC registrant, you have a duty to disclose the existence of pending or known to be contemplated environmental legal proceedings that meet any of the following criteria (17 CFR 229.103(5)(A)-(C)):

- A. Such proceeding is material to the business or financial condition of the registrant;
- B. Such proceeding involves primarily a claim for damages, or involves potential monetary sanctions, capital expenditures, deferred charges or charges to income and the amount involved, exclusive of interest and costs, exceeds 10 percent of the current assets of the registrant and its subsidiaries on a consolidated basis; or
- C. A governmental authority is a party to such proceeding and such proceeding involves potential monetary sanctions, unless the registrant reasonably believes that such proceeding will result in no monetary sanctions, or in monetary sanctions, exclusive of interest and costs, of less than \$100,000; provided, however, that such proceedings which are similar in nature may be grouped and described generically.

Specific information regarding the environmental legal proceedings that must be disclosed is set forth in Item 103 of Regulation S-K or, for registrants using the "small business issuer" reporting system, Item 103(a)-(b) of Regulation S-B. If disclosure is required, it must briefly describe the proceeding, "including the name of the court or agency in which the proceedings are pending, the date instituted, the principal parties thereto, a description of the factual basis alleged to underlie the proceedings and the relief sought."

You have been identified as a party to an environmental legal proceeding to which the United States government is, or was, a party. If you are an SEC registrant, this environmental legal proceeding may trigger, or may already have triggered, the disclosure obligation under the SEC regulations described above.

This notice is being provided to inform you of SEC registrants' duty to disclose any relevant environmental legal proceedings to the SEC. This notice does not create, modify or interpret any existing legal obligations, it is not intended to be an exhaustive description of the legally applicable requirements and it is not a substitute for regulations published in the Code of Federal Regulations. This notice has been issued to you for information purposes only. No determination of the applicability of this reporting requirement to your company has been made by any governmental entity. You should seek competent counsel in determining the applicability of these and other SEC requirements to the environmental legal proceeding at issue, as well as any other proceedings known to be contemplated by governmental authorities.

If you have any questions about the SEC's environmental disclosure requirements, please contact the SEC Office of the Special Senior Counsel for Disclosure Operations at (202) 942-1888.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)
)
Daubert Chemical Company, Inc.)
4700 South Central Avenue)
Stickney Township, Illinois 60638)
EPA ID No.: ILD 005 150 750)
Respondent)
_____)

Docket No. RCRA-05-2011-0015
**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)**

RECEIVED
SEP 29 2011

Consent Agreement and Final Order
Preliminary Statement

**REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY**

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 Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.

3. Respondent is Daubert Chemical Company, Inc., 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). 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. Jurisdiction for this action is conferred upon EPA by Sections 3006 and 3008 of RCRA, 42 U.S.C. §§ 6926 and 6928.

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

Statutory and Regulatory Background

11. 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, 6934.

12. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of 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 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), 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 of 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 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, EPA may assess a civil penalty of up to \$37,500 per day for each violation of Subtitle C of RCRA that occurred after January 12, 2009.

15. The EPA has 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).

Factual Allegations and Alleged Violations

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

17. Respondent is the "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 4700 S. Central Avenue,

Stickney Township, Illinois (facility).

18. On September 25, 2009, EPA conducted an inspection and records review (the inspection) of the facility.

19. The facility consists of land and structures, other appurtenances, and improvements on the land used for generating and storing hazardous waste.

20. Respondent manufactures, among other things, adhesives, polymers, and industrial coatings.

21. At all times relevant to this CAFO, Respondent created solid wastes, including solvent waste and filter bag waste.

22. Respondent's processes at the facility produce several hazardous wastes identified or listed in 35 IAC §§ 721.120 - 721.131, or cause a hazardous waste to become subject to regulation under 35 IAC Parts 720-729.

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

24. On or about August 18, 1980, Respondent submitted to EPA a Hazardous Waste Notification and identified itself as a large quantity generator of hazardous waste.

25. At all times relevant to this CAFO, Respondent generated during each calendar month, more than 1,000 kg of hazardous waste at the facility. Therefore, Respondent is a large quantity generator.

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

27. At all times relevant to this CAFO, the State of Illinois has not issued a permit to

Respondent to treat, store, or dispose of hazardous waste at the facility.

28. At all times relevant to this CAFO, Respondent did not have interim status for the treatment, storage, or disposal of hazardous waste at the facility.

Count 1

29. Complainant incorporates paragraphs 1 through 28 of this CAFO as though set forth in this paragraph.

30. 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.

31. Pursuant to 35 IAC § 722.134 and 40 C.F.R. § 262.34(a), 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 of 35 IAC § 722.134 and 40 C.F.R. § 262.34(a).

32. If the conditions of 35 IAC § 722.134 and 40 C.F.R. § 262.34 are not met, then the generator must apply for an operating permit under 35 IAC § 703.180 and 40 C.F.R. Part 264, 40 C.F.R. §§ 270.1(c), 270.10(a) and (d), and 270.13.

33. At the time of the inspection, Respondent had at least five satellite containers of hazardous waste without the words "Hazardous Waste" or without words identifying the contents of the containers, failing to satisfy the condition of 35 IAC § 722.134(c)(1)(B) and 40 CFR § 262.34(c)(1)(ii).

34. At the time of the inspection, Respondent had one container of hazardous waste that it was managing as a satellite container that was not at or near the point of generation, failing to comply with the conditions of 35 IAC § 722.134(c)(1) and 40 CFR § 262.34(c)(1).

35. At the time of the inspection, Respondent had two containers of hazardous waste that were open while no waste was being added or removed, failing to comply with the conditions of 35 IAC § 722.134(c)(1)(A); 35 IAC § 725.273(a) and 40 CFR § 262.34(c)(1)(i); 40 CFR § 265.173(a).

36. As set forth above, Respondent did not meet the conditions of 35 IAC § 722.134, and 40 C.F.R. § 262.34 necessary to exempt it from the requirement to obtain interim status or apply for and obtain a permit for the storage of hazardous waste; therefore, Respondent stored hazardous waste without a permit or interim status in violation of Section 3005 of RCRA, 42 U.S.C. § 6925, and the regulations found at 35 IAC 703.121(a)(1), 35 IAC § 703.180 and 40 C.F.R. Part 264, 40 C.F.R. §§ 270.1(c), 270.10(a) and (d), and 270.13.

Civil Penalty

37. 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 \$9,000. In determining the penalty amount, Complainant took into account the seriousness of the violation, any good faith efforts to comply with the applicable requirements, and Respondent's agreement to perform a supplemental environmental project. Complainant also considered EPA's RCRA Civil Penalty Policy, dated June 23, 2003.

38. Within 30 days after the effective date of this CAFO, Respondent must pay a \$9,000 civil penalty for the RCRA violations by sending a cashier's or certified check, payable to the "Treasurer, United States of America," to:

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

The check must state the case title (Daubert Chemical Company, Inc.), the docket number of this CAFO and the billing document number.

39. A transmittal letter, stating, Respondent's name, the case title, Respondent's complete address, the case docket number and the billing document number must accompany the payment. Respondent must send a copy of the check and transmittal letter to:

Regional Hearing Clerk (E-19J)
EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Graciela Scambiaterra (LR-8J)
RCRA Branch
EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

J. Matthew Moore (C-14J)
Office of Regional Counsel
EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

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

41. If Respondent does not timely pay the civil penalty, or any stipulated penalty as outlined in paragraph 55, 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.

42. 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.

Supplemental Environmental Project

43. Respondent must complete a supplemental environmental project (SEP) designed to protect the environment by limiting the amount of hazardous waste generated at the facility.

44. At its Stickney Township, Illinois facility, Respondent must complete the SEP as follows:

- a. By November 15, 2011, Respondent must purchase two new Purolator Metal Edge self cleaning filters (Purolator Model F144 Metal Edge Motor Driven Stainless Steel Filter Assembly along with housing designed and fabricated per ASME section VIII, Div 1, Inlet/Outlet connections, and drain connection) and related equipment.
- b. By December 31, 2011, Respondent must complete the installation of the two filters and related equipment, along with the accompanying parts.

45. Respondent must spend at least \$36,936 to purchase the equipment and at least \$14,000 to complete installation.

46. Respondent must use or operate the equipment that was installed pursuant to Paragraph 44, for all standard processes involving tanks 40, 46 and 47, for three years following its installation.

47. Respondent certifies that it is not required to perform or develop the SEP by any law, regulation, grant, order, or agreement, or as injunctive relief as of the date it signs this CAFO. Respondent further certifies that it has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

48. EPA may inspect the facility at any time to monitor Respondent's compliance with this CAFO's SEP requirements.

49. Respondent will submit a certification of installation and annual SEP operating report that describe the amount of hazardous waste generated at the facility using the Purolator Metal Edge self cleaning filters. The certification of installation and annual SEP operating reports must be submitted within 10 days of each of the following dates:

- a. Certification of Installation – January 31, 2012;
- b. SEP Operating Report 1 - January 31, 2013; and
- c. SEP Operating Report 2 - January 31, 2014.

50. Respondent must submit a SEP completion report to EPA by January 31, 2015.

This report must contain the following information:

- a. Detailed description of the SEP as completed;
- b. Description of any operating problems and the actions taken to correct the problems;
- c. Itemized costs of goods and services, excluding costs associated with continued maintenance of the equipment, used to complete the SEP documented by copies of invoices, purchase orders, or canceled checks that specifically identify and itemize the individual costs of the goods and services;
- d. Certification that Respondent has completed the SEP in compliance with this CAFO; and
- e. Description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible).

51. Respondent must submit all notices and reports required by this CAFO by email and first class or overnight mail to Graciela Scambiaterra, of the RCRA Branch, at the address specified in paragraph 39, above.

52. In each report that Respondent submits as provided by this CAFO, it must certify

that the report is true and complete by including the following statement signed by one of its officers:

I certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, it is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

53. Following receipt of the SEP completion report described in paragraph 50, above, EPA must notify Respondent in writing that:

- a. Respondent has satisfactorily completed the SEP and the SEP report;
- b. There are deficiencies in the SEP as completed or in the SEP report and EPA will give Respondent 30 days to correct the deficiencies; or
- c. It has not satisfactorily completed the SEP or the SEP report and EPA will seek stipulated penalties under paragraph 55.

54. If EPA exercises option b, above, Respondent may object in writing to the deficiency notice within ten days of receiving the notice. The parties will have 30 days from EPA's receipt of Respondent's objection to reach an agreement. If the parties cannot reach an agreement, EPA will give Respondent a written decision on its objection. Respondent will comply with any requirements that EPA imposes in its decision. If Respondent does not complete the SEP as required by EPA's decision, Respondent will pay stipulated penalties to the United States under paragraph 55, below.

55. If Respondent violates any requirement of this CAFO relating to the SEP, Respondent must pay stipulated penalties to the United States as follows:

- a. Except as provided in subparagraph b, below, if Respondent did not complete the SEP satisfactorily according to the requirements of this CAFO including the schedule in paragraph 44, Respondent must pay a penalty of \$8,138.
- b. If Respondent did not complete the SEP satisfactorily, but EPA determines that Respondent (i) made good faith and timely efforts to complete the SEP and (ii)

certified, with supporting documents, that it spent at least 90 percent of the amount set forth in paragraph 45, Respondent will not be liable for a stipulated penalty under subparagraph a, above.

- c. If Respondent completed the SEP satisfactorily, but spent less than 90 percent of the amount set forth in paragraph 45, Respondent must pay a penalty of \$814.
- d. If Respondent did not timely submit the SEP completion report, Respondent must pay penalties in the following amounts for each day after the report was due until it submits the report:

<u>Penalty per violation per day</u>	<u>Period of violation</u>
\$ 500	1 st through 14 th day
\$1,000	15 th through 30 th day
\$1,500	31 st day and beyond

56. EPA's determinations of whether Respondent satisfactorily completed the SEP and whether Respondent made good faith and timely efforts to complete the SEP will bind Respondent.

57. Respondent must pay any stipulated penalties within 15 days of receiving EPA's written demand for the penalties. Respondent will use the method of payment specified in paragraph 38, above, and will pay interest, handling charges, and nonpayment penalties on any overdue amounts.

58. Any public statement that Respondent makes referring to the SEP must include the following language, "Daubert Chemical Company undertook this project under the settlement of the United States Environmental Protection Agency's enforcement action against Daubert Chemical Company for violations of Section 3005 of RCRA, 42 U.S.C. § 6925, and the regulations found at 35 IAC § 703.180 and 40 C.F.R. Part 264, 40 C.F.R. §§ 270.1(c), 270.10(a) and (d), and 270.13."

59. Respondent certifies that:

I certify that I am not a party to an open federal financial assistance transaction that is funding or could be used to fund the same activity as the SEP. I further certify that, to the best of my knowledge and belief after reasonable inquiry, there is no such open federal financial transaction that is funding or could be used to fund the same activity as the SEP, nor has the same activity been described in an unsuccessful federal financial assistance transaction proposal submitted to EPA within two years of the date of this settlement (unless the project was barred from funding as statutory ineligible). For the purpose of this certification, the term "open federal financial assistance transaction" refers to a grant, cooperative agreement, loan, federally-guaranteed loan guarantee or other mechanism for providing federal financial assistance whose performance period has not yet expired.

60. Nothing in this CAFO is intended to, nor will be construed to, constitute EPA approval of the equipment or technology installed by the Respondent in connection with the SEP under this CAFO.

61. For Federal Income Tax purposes, Respondent will neither capitalize into inventory or basis, nor deduct any costs or expenditures incurred in performing the SEP.

General Provisions

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

63. This CAFO does not affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

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

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

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

67. 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.

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

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

Daubert Chemical Company, Respondent

9/20/2011
Date

Mark D. Pawelski
Mark D. Pawelski
Executive Vice President,
Operations
Daubert Chemical Company, Inc.

United States Environmental Protection Agency, Complainant

9/26/11
Date

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

In the Matter of:
Daubert Chemical Company
Docket No. RCRA-05-2011-0015

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.

9-28-11

Date



Susan Hedman
Regional Administrator
United States Environmental Protection Agency
Region 5

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SEP 29 2011

**REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY**

U.S. ENVIRONMENTAL
PROTECTION AGENCY

SEP 29 2011

OFFICE OF REGIONAL
COUNSEL

CASE NAME: Daubert Chemical Company, Inc.

DOCKET NO: RCRA-05-2011-0015

CERTIFICATE OF SERVICE

I hereby certify that today I filed the original of this **Complaint and Compliance Order** and this **Certificate of Service** in the office of the Regional Hearing Clerk (E-19J), United States Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, Chicago, IL 60604-3590.

I further certify that I then caused true and correct copies of the filed document to be mailed to the following:

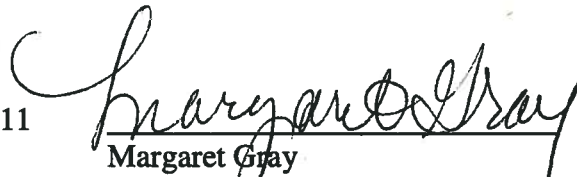
Mark D. Pawelski
Executive Vice President, Operations
Daubert Chemical Company, Inc.
4700 S. Central Avenue
Chicago, Illinois 60638

Certified Mail #

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SEP 29 2011

**REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY**

Dated: 9/29/11, 2011



Margaret Gray
Administrative Program Assistant
United States Environmental Protection Agency
Region 5
Land and Chemicals Division LR-8J
RCRA Branch
77 W. Jackson Blvd, Chicago, IL 60604-3590