



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

APR - 5 2018

REPLY TO THE ATTENTION OF:

LC-17J

VIA EMAIL

Mr. Shawn Wiram
Director Safety, Health and Environment
Brenntag Great Lakes, LLC
4420 North Harley Davidson Avenue
Milwaukee, Wisconsin 53225

SWiram@brenntag.com

**Re: Consent Agreement and Final Order - In the Matter of: Brenntag Great Lakes, LLC
FIFRA-05-2018-0020**

Mr. Wiram:

Enclosed, please find a copy of a fully executed Consent Agreement and Final Order in resolution of the above-referenced matter. This document was filed on April 5, 2018 with our Regional Hearing Clerk.

The civil penalty in the amount of \$126,000 is to be paid in the manner described in paragraphs 73-74. Please be certain that your company's name and the docket number of this case are written on both the transmittal letter and the check, or in the comments field if you are paying by electronic funds transfer. Payment is due within 30 calendar days of the filing date.

Thank you for your cooperation to resolve this matter. Please do not hesitate to contact me if you have any questions regarding this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Abigail Wesley".

Abigail Wesley
Pesticides and Toxics Compliance Section

Enclosure

cc: Jacqueline Clark, C-14J

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:

Brenntag Great Lakes, LLC
Milwaukee, Wisconsin,

Respondent.



Docket No. FIFRA-05-2018-0020

Proceeding to Assess a Civil Penalty
Under Section 14(a) of the Federal
Insecticide, Fungicide, and Rodenticide
Act, 7 U.S.C. § 136l(a).

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 14(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. § 136l(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. Complainant is the Director of the Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.
3. Respondent is Brenntag Great Lakes, LLC of Milwaukee, Wisconsin (Brenntag), a limited liability company also doing business in the State of Minnesota.
4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be simultaneously commenced and concluded 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. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the specific factual allegations and legal conclusions in this CAFO.

8. 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.

9. Respondent certifies that as of the date of its execution of this CAFO, it has taken appropriate actions to address and correct the alleged FIFRA violations set forth in this CAFO, and to the best of its knowledge, is in compliance with the requirements of FIFRA, 7 U.S.C. §§ 136 to 136y.

Statutory and Regulatory Background

10. Section 2(s) of FIFRA, 7 U.S.C. § 136(s), defines the term “person” as “any individual, partnership, association, corporation, or any organized group of persons whether incorporated or not.”

11. Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), defines the term “distribute or sell” as “to distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, release for shipment, or receive and (having so received) deliver or offer to deliver.” Also see 40 C.F.R. § 152.3.

12. Section 2(u) of FIFRA, 7 U.S.C. § 136(u), defines the term “pesticide” as, among other things, “any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest.” Also see 40 C.F.R. § 152.3.

13. Section 2(t) of FIFRA, 7 U.S.C. § 136(t), defines the term “pest” as “any insect, rodent, nematode, fungus, weed, or any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism which the Administrator [of the EPA] declares to be a pest” under Section 25(c)(1) of FIFRA, 7 U.S.C. § 136w(c)(1). Also see 40 C.F.R. § 152.5.

14. Section 2(w) of FIFRA, 7 U.S.C. § 136(w), defines the term “producer” as a person who manufactures, prepares, compounds, propagates, or processes any pesticide or active ingredient used in producing a pesticide.

15. Section 2(p)(1) of FIFRA, 7 U.S.C. § 136(p)(1), defines a “label” as written, printed, or graphic matter on, or attached to, the pesticide or device or any of its containers or wrappers.

16. Section 2(p)(2) of FIFRA, 7 U.S.C. § 136(p)(2), defines “labeling” as all labels and all other written, printed, or graphic matter accompanying the pesticide or device at any time or to which reference is made on the label or in literature accompanying the pesticide or device.

17. Section 3(a) of FIFRA, 7 U.S.C. § 136a(a), states that no person in any State may distribute or sell to any person any pesticide that is not registered under Section 3 of FIFRA.

18. 40 C.F.R. § 152.132 states that a registrant may distribute or sell his registered product under another person’s name and address instead of (or in addition to) his own. The product is referred to as a “distributor product.”

19. 40 C.F.R. § 152.132 states that supplemental distribution is permitted upon notification to the Agency if all of the following conditions are met: (a) The registrant has submitted to the Agency for each distributor product a statement signed by both the registrant and the distributor listing the names and addresses of the registrant and the distributor, the distributor’s company number, the additional brand name(s) to be used, and the registration number of the registered product, (b) The distributor product is produced, packaged and labeled in a registered establishment operated by the same producer who produces, packages, and labels the registered product, (c) The distributor product is not repackaged (remains in the producer’s unopened containers), (d) The label of the distributor product is the same as that of

the registered product, except that the product name of the distributor product may be different, the name and address of the distributor may appear instead of that of the registrant, the registration number of the registered product must be followed by a dash, followed by the distributor's company number, the establishment number must be that of the final establishment at which the product was produced, and specific claims may be deleted, provided that no other changes are necessary, and (e) Voluntary cancellation of a product applies to the registered product and all distributor products distributed or sold under that registration number.

20. 40 C.F.R. § 152.132 also specifies that a distributor is considered an agent of the registrant for all intents and purposes under FIFRA, and both the registrant and the distributor may be held liable for violations pertaining to the distributor product.

21. Section 3(c)(1) of FIFRA, 7 U.S.C. § 136a(c)(1), states, in pertinent part, "each applicant for registration of a pesticide shall file with the Administrator [of EPA] a statement which includes... (C) a complete copy of the labeling of the pesticide, a statement of all claims to be made for it, and any directions for use."

22. Section 19 of FIFRA, 7 U.S.C. § 136q(a)(1), states, in pertinent part, "the Administrator may require under Section 3 or 6 of FIFRA that... (B) the labeling of a pesticide contain requirements and procedures for the transportation, storage, and disposal of the pesticide, any container of the pesticide, any rinsate containing the pesticide, or any other material used to contain or collect excess or spilled quantities of the pesticide."

23. 40 C.F.R. § 156.10(a)(1) states that every pesticide product shall bear a label containing the information specified by FIFRA and the regulations in 40 C.F.R. Part 156.

24. 40 C.F.R. § 156.10(a)(1)(viii) states that the contents of a label must show clearly and prominently, in pertinent part, the direction for use as prescribed in 40 C.F.R. § 156.10(i).

25. 40 C.F.R. § 156.60 states that each product label is required to bear hazard and precautionary statements for humans and domestic animals.

26. 40 C.F.R. § 156.70(b) states, in pertinent part, “When data or other information show that an acute hazard may exist to human and domestic animals, the label must bear precautionary statements describing the particular hazard, the route(s) of exposure and the precautions to be taken to avoid accident, injury or toxic effect or to mitigate the effect.”

27. 40 C.F.R. § 156.10(a)(1)(iii) states that the contents of a label must show clearly and prominently the net contents. See also 40 C.F.R. § 156.10(d).

28. Section 2(q)(1)(F) of FIFRA, 7 U.S.C. § 136(q)(1)(F), defines a pesticide as “misbranded” if it does not contain directions for use which are necessary for effecting the purpose for which the product is intended and if compiled with, together with any requirements imposed under section 3(d) of FIFRA, are adequate to protect health and the environment.

29. Section 2(q)(1)(G) of FIFRA, 7 U.S.C. § 136(q)(1)(G), defines a pesticide as “misbranded” if its label does not contain a warning or caution statement which may be necessary and if compiled with, together with any requirement imposed under Section 3(d) of FIFRA, is adequate to protect health and the environment.

30. Section 2(q)(2)(C)(iii) of FIFRA, 7 U.S.C. § 136(q)(2)(C)(iii), defines a pesticide as “misbranded” if there is not affixed to its container the net weight or measure of the content.

31. Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A), states it is unlawful for any person in any state to distribute or sell to any person any pesticide that is not registered under Section 3 of FIFRA.

32. Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), states it is unlawful for any person in any state to distribute or sell to any person any pesticide which is adulterated or misbranded.

33. Section 14(a)(1) of FIFRA, 7 U.S.C. § 136l(a)(1), provides that any registrant, commercial applicator, wholesaler, dealer, retailer or other distributor who violates any provision of FIFRA may be assessed a civil penalty by EPA of not more than \$5,000 for each offense. The Federal Civil Penalties Inflation Adjustment Act of 1990, as amended, 28 U.S.C. § 2461, and its implementing regulations at 40 C.F.R. Part 19, increased the amount that can be assessed to \$7,500 for each offense that occurred after January 12, 2009; \$7,500 for each offense that occurred after December 6, 2013; and \$18,750 for each offense occurring after November 2, 2015 and assessed on or after January 15, 2017. See 73 Fed. Reg. 75340 (January 12, 2009), 78 Fed. Reg. 66643 (November 6, 2013), and 82 Fed. Reg. 3633 (January 12, 2017).

Factual Allegations

34. Respondent is a “person” as that term is defined at Section 2(s) of FIFRA, 7 U.S.C. § 136(s).

35. The Respondent is a “producer” as defined at Section 2(w) of FIFRA, 7 U.S.C. § 136(w).

36. At all times relevant to this CAFO, Brenntag owned or operated a place of business located at 2130 Energy Park Drive, Saint Paul, Minnesota (the Facility).

37. On or about July 24, 2014, an inspector employed with the Minnesota Department of Agriculture (MDA), who is an authorized representative of EPA, inspected the Brenntag Facility (the Inspection).

38. At all times relevant to this CAFO, Respondent’s Facility was an EPA registered establishment identified by EPA Establishment Number (EPA Est. No.) 51087-MN-001.

Sodium Hypochlorite 12.5%, EPA Reg. No. 75373-20001-51087

39. During the Inspection, the inspector collected labeling, receiving and distribution records for Sodium Hypochlorite 12.5%, identified on the label as EPA Registration Number (EPA Reg. No.) 75373-20001-51087.

40. Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 75373-20001-51087, is a “pesticide” as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

41. At all times relevant to this CAFO, Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 75373-20001-51087, was not registered under Section 3 of FIFRA, 7 U.S.C. § 136(a).

42. During calendar year 2014, Respondent distributed or sold Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 75373-20001-51087, on at least one occasion.

Sodium Hypochlorite 12.5%, EPA Reg. No. 813-15-51087

43. During the Inspection, the inspector collected labeling, receiving and distribution records for Sodium Hypochlorite 12.5%, identified on the label as EPA Reg. No. 813-15-51087.

44. Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 813-15-51087, is a “pesticide” as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

45. At all times relevant to this CAFO, Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 813-15-51087, was not registered under Section 3 of FIFRA, 7 U.S.C. § 136(a).

46. During calendar year 2014, Respondent distributed or sold Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 813-15-51087, on at least 13 separate occasions.

Sodium Hypochlorite 10%, EPA Reg. No. 813-16-51087

47. During the Inspection, the inspector collected labeling, receiving and distribution records for Sodium Hypochlorite 10%, EPA Reg. No. 813-16-51087.

48. Sodium Hypochlorite 10%, EPA Reg. No. 813-16-51087, is a “pesticide” as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

49. At all times relevant to this CAFO, the labels for Sodium Hypochlorite 10%, EPA Reg. No. 813-16-51087, that were collected during the inspection, were misbranded, as they did not include all the required first aid, hazard and precautionary, directions for use, and storage and disposal statements, in addition to failing to contain the net contents or measure of contents.

50. During calendar year 2014, Respondent distributed or sold Sodium Hypochlorite 10%, EPA Reg. No. 813-16-51087, on at least six separate occasions.

Sodium Hypochlorite Solution, EPA Reg. No. 67649-20001-51087

51. During the Inspection, the inspector collected labeling, receiving and distribution records for Sodium Hypochlorite Solution, EPA Reg. No. 67649-20001-51087.

52. Sodium Hypochlorite Solution, EPA Reg. No. 67649-20001-51087, is a “pesticide” as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

53. At all times relevant to this CAFO, the labels for Sodium Hypochlorite Solution, EPA Reg. No. 67649-20001-51087, that were collected during the Inspection, were misbranded, as they did not include all the required hazard and precautionary, directions for use, and storage and disposal statements, in addition to failing to contain the net contents or measure of contents.

54. During calendar year 2013, Respondent distributed or sold Sodium Hypochlorite Solution, EPA Reg. No. 67649-20001-51087, on at least one occasion.

Counts

Count 1 - Sodium Hypochlorite 12.5%, EPA Reg. No. 75373-20001-51087

55. Complainant incorporates paragraphs 1 through 54 of this CAFO as if set forth in full in this paragraph.

56. During calendar year 2014, Respondent distributed or sold the unregistered pesticide, Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 75373-20001-51087, on one occasion.

57. Respondent's distribution or sale of the unregistered pesticide Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 75373-20001-51087, on one occasion, constitutes an unlawful act pursuant to Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A).

58. Respondent's alleged violation of Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A), subjects Respondent to the assessment of a civil penalty under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a).

Counts 2 - 14 - Sodium Hypochlorite 12.5%, EPA Reg. No. 813-15-51087

59. Complainant incorporates paragraphs 1 through 54 of this CAFO as if set forth in full in this paragraph.

60. During calendar year 2014, Respondent distributed or sold the unregistered pesticide Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 813-15-51087, on 13 separate occasions.

61. Respondent's distribution or sale of the unregistered pesticide Sodium Hypochlorite 12.5%, identified by EPA Reg. No. 813-15-51087, on 13 separate occasions, constitutes 13 separate unlawful acts pursuant to Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A).

62. Respondent's alleged violation of Section 12(a)(1)(A) of FIFRA, 7 U.S.C.

§ 136j(a)(1)(A), on 13 separate occasions subjects Respondent to the assessment of a civil penalty under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a) for each of the 13 alleged violations.

Counts 15 - 20 - Sodium Hypochlorite 10%, EPA Reg. No. 813-16-51087

63. Complainant incorporates paragraphs 1 through 54 of this CAFO as if set forth in full in this paragraph.

64. During calendar year 2014, Respondent distributed or sold the misbranded pesticide Sodium Hypochlorite 10%, EPA Reg. No. 813-16-51087, on six separate occasions.

65. Respondent's distribution or sale of the unregistered pesticide, Sodium Hypochlorite 10%, EPA Reg. No. 813-16-51087, on six separate occasions, constitutes six separate unlawful acts pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

66. Respondent's alleged violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), on six separate occasions subjects Respondent to the assessment of a civil penalty under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a) for each of the six alleged violations.

Count 21 - Sodium Hypochlorite Solution, EPA Reg. No. 67649-20001-51087

67. Complainant incorporates paragraphs 1 through 54 of this CAFO as if set forth in full in this paragraph.

68. During calendar year 2013, Respondent distributed or sold the misbranded pesticide Sodium Hypochlorite Solution, EPA Reg. No. 67649-20001-51087, on at least one occasion.

69. Respondent's distribution or sale of the misbranded pesticide Sodium Hypochlorite Solution, EPA Reg. No. 67649-20001-51087, on at least one occasion, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

70. Respondent's alleged violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C.

§ 136j(a)(1)(E), on at least one occasion subjects Respondent to the assessment of a civil penalty under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a).

Civil Penalty and Other Relief

71. Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(4), requires the EPA Administrator to consider the size of the business of the person charged, the effect on that person's ability to continue in business, and the gravity of the violations, when assessing an administrative penalty under FIFRA.

72. Based on an evaluation of the violations alleged in this CAFO, the factors in Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(a)(4), specifically including Respondent's size of business, ability to continue in business, and gravity of the alleged violations, and in consideration of EPA's "Enforcement Response Policy for the Federal Insecticide, Fungicide, and Rodenticide Act," dated December 2009, Complainant has determined the appropriate civil penalty to settle this action is \$126,000.

73. Within 30 calendar days after the effective date of this CAFO, Respondent must pay a \$126,000 civil penalty for the FIFRA violations alleged herein. Respondent must pay the penalty by sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

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

In the comment or description field of the electronic funds transfer, include "Brenntag Great Lakes, LLC" and the docket number of this CAFO.

74. Respondent must send a notice of payment that states Respondent's name

and the case docket number to EPA, Region 5 at the following addresses when it pays the penalty:

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

Abigail Wesley
Pesticides and Toxics Compliance Section (LC-17J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Jacqueline Clark
Office of Regional Counsel (C-14J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

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

76. If Respondent does not pay the civil penalty in a timely manner, EPA may refer the matter to the Attorney General who will recover such amount by action in the appropriate United States district court under Section 14(a)(5) of FIFRA, 7 U.S.C. § 136(a)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

77. 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. 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 six percent (6%) per year penalty on any principal amount 90 days past due.

General Provisions

78. Consistent with the “Standing Order Authorizing E-Mail Service of Orders and Other Documents Issued by the Regional Administrator or Regional Judicial Officer under Consolidated Rules,” dated March 27, 2015, the parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: clark.jacqueline@epa.gov (for Complainant), and SWiram@brenntag.com (for Respondent). The parties waive their right to service by the methods specified in 40 C.F.R. Part 22.

79. This CAFO resolves Respondent’s liability only for federal civil penalties for the violations and facts alleged in this CAFO.

80. 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.

81. This CAFO does not affect Respondent’s responsibility to comply with FIFRA and any other applicable federal, State, and local laws.

82. This CAFO is a “final order” for purposes of EPA’s Enforcement Response Policy for FIFRA.

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

84. Each person signing this CAFO 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.

85. Each party agrees to bear its own costs and attorney’s fees, in this action.

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

- Signature pages follow -

**In the Matter of:
Brenntag Great Lakes, LLC, Milwaukee, Wisconsin**

3/12/18

Date



Dan Arneson

President

Brenntag Great Lakes, LLC

Milwaukee, Wisconsin

In the Matter of:
Brenntag Great Lakes, LLC, Milwaukee, Wisconsin

United States Environmental Protection Agency, Complainant

4/02/2018
Date


Michael D. Harris
Michael D. Harris
Acting Division Director
Land and Chemicals Division
United States Environmental Protection Agency
Region 5

In the Matter of:
Brenntag Great Lakes, LLC, Milwaukee, Wisconsin
Docket No. FIFRA-05-2018-0020

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, United States Environmental Protection Agency, Region 5. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

4/4/18
Date



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

Consent Agreement and Final Order
In the Matter of: Brenntag Great Lakes, LLC, Milwaukee, Wisconsin


CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing Consent Agreement and Final Order, Docket Number: FIFRA-05-2018-0020, which was filed on

April 5, 2018, 2018, in the following manner to the following addressees:

- | | |
|---|--|
| Copy by E-mail to
Regional Judicial Officer: | Ms. Ann L. Coyle
coyle.ann@epa.gov |
| Copy by E-mail to
Respondent: | Mr. Shawn P. Wiram
SWiram@brenntag.com |
| Copy by E-mail to
Attorney for Respondent: | Mr. Chase E. Dressman
cdressman@taftlaw.com |
| Copy by E-mail to
Complainant: | Ms. Abigail Wesley
wesley.abigail@epa.gov |
| Copy by E-mail to
Attorney for Complainant: | Ms. Jacqueline Clark
clark.jacqueline@epa.gov |

Dated: April 5, 2018



LaDawn Whitehead
Regional Hearing Clerk
United States Environmental Protection Agency
Region 5