

**BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, PA 19103**

In the Matter of

Bayer CropScience LP
Route 25
Institute, WV 25112

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Docket No. CAA-03-2014-0057

**Proceeding Under Section 113(d)
of the Clean Air Act**

REGIONAL HEARING CLERK
EPA REGION III, PHILA. PA

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CONSENT AGREEMENT

I. Preliminary Statement

1. This Consent Agreement is entered into by the Complainant, the Director of the Air Protection Division, U.S. Environmental Protection Agency ("EPA"), Region III, and Bayer CropScience LP ("Bayer" or "Respondent"), and is filed with the accompanying Final Order pursuant to Section 113 of the Clean Air Act ("CAA" or the "Act"), as amended, 42 U.S.C. § 7413, and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. Part 22 (the "Consolidated Rules of Practice"). The Consolidated Rules of Practice, at 40 C.F.R. § 22.13, provide in pertinent part that when parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding simultaneously may be commenced and concluded by the issuance of a consent agreement and final order pursuant to 40 C.F.R. § 22.18(b)(2) and (3).
2. This Consent Agreement and the accompanying Final Order address the specifically alleged violations by Respondent of 40 C.F.R. Part 63, Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks ("Subpart H") and 40 C.F.R. Part 63, Subpart MMM, National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production ("Subpart MMM").

II. General Provisions

3. Section 113(a)(3) and (d) of the Act, 42 U.S.C. § 7413(a)(3) and (d), authorizes the Administrator of EPA to issue an administrative order assessing a civil administrative penalty whenever, on the basis of any information available to the Administrator, the Administrator finds that any person has violated, or is in violation of, any requirement, rule, plan, order, waiver, or permit promulgated, issued, or approved under Subchapters I, IV, V and VI [also referred to as Titles I, IV, V and VI] of the Act. The authority to issue the accompanying Final Order has been duly delegated to the Regional Judicial Officer, EPA Region III.

4. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this Consent Agreement and Final Order and agrees not to contest EPA's jurisdiction with respect to the issuance, execution and enforcement of this Consent Agreement and the accompanying Final Order.
5. Respondent consents to the issuance of this Consent Agreement and the accompanying Final Order and agrees to comply with the terms and conditions set forth therein.
6. Respondent neither admits nor denies the specific findings of fact and conclusions of law set forth in this Consent Agreement and the accompanying Final Order except as otherwise stated in Paragraph 4.
7. Respondent agrees that this Consent Agreement and the accompanying Final Order shall apply to, and be binding upon, Respondent, its officers, directors, servants, employees, agents, successors and assigns.
8. For the purposes of this proceeding, Respondent hereby expressly waives its right to a hearing with respect to any issue of law or fact set forth in this Consent Agreement and the accompanying Final Order, including the finality and/or validity thereof. Respondent hereby expressly waives its right to contest the factual allegations and legal conclusions set forth in Section III, "Findings of Fact and Conclusions of Law," of this Consent Agreement and any right to appeal the accompanying Final Order.

III. Findings of Fact and Conclusions of Law

9. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3), EPA alleges the following findings of fact and conclusions of law:
10. Bayer is a Delaware limited partnership with a headquarters located at 2 T.W. Alexander Drive, P.O. Box 12014, Research Triangle Park, North Carolina 27709.
11. Bayer owns and operates a pesticide active ingredient manufacturing facility located at Route 25, Institute, West Virginia, 25112 (the "Facility").
12. At all times relevant to this Consent Agreement, the Facility encompassed a powerhouse, a wastewater treatment plant, and several process units such as the Larvin and FMC Units (sometimes also referred to as "Carbaryl" or "Westcarb").
13. Bayer is a "person" as defined by Section 302(e) of the Act, 42 U.S.C. § 7602(e).

14. Section 112 of the Act, 42 U.S.C. § 7412, imposes requirements on the emission of hazardous air pollutants (“HAPs”) from major sources to, among other things, meet maximum achievable control technology (“MACT”) standards.
15. Pursuant to Section 112 of the Act, 42 U.S.C. § 7412, EPA promulgated the previously identified standards: 40 C.F.R. Part 63, Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks (“Subpart H”) and 40 C.F.R. Part 63, Subpart MMM, National Emission Standards for Hazardous Air Pollutants from Pesticide Active Ingredient Production (“Subpart MMM”);
16. “Organic HAP” means those HAPs listed in Section 112(b) of the Act, 42 U.S.C. § 7412(b), that are measured according to the procedures of Method 18 or Method 25A, 40 C.F.R. Part 60, Appendix A.
17. A “major source” pursuant to Section 112(a) of the Act, 42 U.S.C. § 7412(a), is a stationary source or group of stationary sources within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any HAP or 25 tons per year or more of any combination of HAPs.
18. As provided by Subpart MMM, 40 C.F.R. § 63.1360(a), the requirements of Subpart MMM apply to pesticide active ingredient manufacturing process units (“PAI process units”) that process, use, or produce HAPs, and are located at a plant site that is a major source, as defined in Section 112(a) of the Act.
19. In accordance with Subpart MMM, 40 C.F.R. § 63.1363 (Standards for Equipment Leaks), a subject owner or operator shall monitor, after the initial survey, all valves at the intervals specified in 40 C.F.R. §§ 63.1363(e)(3) and (4).
20. In accordance with 40 C.F.R. § 63.1363(e)(4)(i), for a group of processes with 2 percent or greater leaking valves, the owner or operator shall monitor each valve once per month at any plant with more than 250 valves in organic HAP service.
21. In accordance with 40 C.F.R. § 63.1363(e)(4)(ii), for a group of processes with less than 2 percent leaking valves, but more than 1 percent leaking valves, the owner or operator shall monitor each valve once each quarter.
22. In accordance with 40 C.F.R. § 63.1363(e)(7)(ii), when a leak is detected at a valve, a first attempt at repair shall be made no later than five calendar days after the leak is detected.
23. In accordance with 40 C.F.R. § 63.1363(e)(7)(iii), monitoring is required to satisfy the definition of “first attempt at repair” under 40 C.F.R. § 63.1361.
24. The Facility is a major source as defined in Section 112(a) of the Act, 42 U.S.C. 7412(a), because it is a stationary source that emits or has the potential to emit 10 tons or more per

year of a HAP or more than 25 tons per year of a combination of HAPs, including, but not limited to hydrochloric acid, hydrogen fluoride, and phosgene.

25. From April 5 to April 7, 2011, EPA conducted an on-site review of the Facility's Leak Detection & Repair Program ("LDAR") for fugitive leaks of hazardous air pollutants. During the inspection, Bayer provided EPA with a copy of its LDAR database, which included information on all monitoring events conducted at the Facility from April 1, 2006 through March 31, 2011.
26. At the time of EPA's inspection, the Larvin and FMC process units were operating.
27. These process units are PAI process units that process, use, or produce HAPs.
28. A Title V permit has been issued to the Facility (R30-03900007) in eight parts by the West Virginia Department of Environmental Protection ("WVDEP").
29. Title V Permit R30-03900007-2011, Group 6 of 8, governs the Larvin Unit. Section 4.1.15 of that permit sets out the requirements for equipment leaks and the required compliance with Subparts H and MMM.
30. Title V Permit R30-03900007-2010, Group 3 of 8, governs the FMC Unit. Section 4.1.10 of that permit sets out the requirements for equipment leaks and the required compliance with Subparts H and MMM.

Inadequate Monitoring Frequency for Valves at the Facility

31. The Larvin and FMC Units all contain equipment valves that are subject to the requirements of Subpart MMM and are required to be monitored monthly or quarterly.
32. As indicated in Appendix A, attached hereto, Bayer failed to monitor a number of valves at the Larvin or FMC Units within 150 days of its last monitoring event, despite the requirements for monthly or quarterly monitoring of such valves.
33. Bayer violated 40 C.F.R. § 63.1363(e)(4)(i) or (ii) on the occasions indicated in Paragraph 32, above, by failing to timely conduct the required monthly or quarterly monitoring of such valves.

Failure to Perform Timely Re-Monitoring for Leaking Valves at the Facility

34. As indicated below, Bayer failed to re-monitor within five days the valves that it had determined to be leaking during a prior monitoring event:

Valve 1270 FMC Unit, failed May 27, 2009
Valve 1132 FMC Unit, failed May 27, 2009

35. Bayer violated 40 C.F.R. 63.1363(e)(7)(ii) on the occasions identified in Paragraph 34, above, by failing to perform re-monitoring of a valve within five days of the time that a leak was detected at that valve. A failure to re-monitor within five days constitutes a failure to make a first attempt at repair within five days because re-monitoring is a necessary part of the definition of “first attempt at repair.”

IV. Settlement Recitation, Settlement Conditions and Civil Penalty

36. Complainant and Respondent enter into this Consent Agreement and the accompanying Final Order in order to settle fully and resolve all violations set forth in Section III (Paragraphs 9 through 35) of this Consent Agreement.
37. In full and final settlement of the allegations in Section III, Findings of Fact and Conclusions of Law, of this Consent Agreement and in consideration of each provision of this Consent Agreement and the accompanying Final Order, Respondent consents to the assessment and payment of a civil penalty in the amount of Nine Thousand, Three Hundred Dollars (\$9,300.00) within the time and manner specified herein.
38. The settlement amount of Nine Thousand, Three Hundred Dollars (\$9,300.00) is based upon Complainant’s consideration and application of the statutory penalty factors set forth in Section 113(e) of the Act, 42 U.S.C. § 7413(e) (which include the size of the business, economic impact of the penalty, the violator’s full compliance history and good faith efforts to comply, the duration of the violation as established by any credible evidence, the economic benefit of noncompliance, the payment of penalties previously assessed for same violation, the seriousness of violation and such other matters as justice may require), and EPA’s Clean Air Act Stationary Source Civil Penalty Policy (dated October 25, 1991), as indexed for inflation in keeping with 40 C.F.R. Part 19 (Adjustment to Civil Monetary Penalties for Inflation). Complainant has determined that Respondent’s payment of this civil penalty shall constitute full and final satisfaction of the violations set forth in Section III of this Consent Agreement.
39. Respondent shall pay the civil penalty of Nine Thousand, Three Hundred Dollars (\$9,300.00) no later than thirty (30) days after the effective date of this Consent Agreement and accompanying Final Order in order to avoid the assessment of interest, administrative costs, and late payment penalties in connection with such civil penalty as described in this Consent Agreement and accompanying Final Order.
40. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. §13.11, EPA is entitled to assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim, as more fully described below. Accordingly, Respondent’s failure to make timely payment or to comply with the conditions in this Consent Agreement and Final Order shall result in the assessment of late payment

charges including interest, penalties, and/or administrative costs of handling delinquent debts.

41. Interest on the civil penalty assessed in this Consent Agreement and Final Order will begin to accrue on the date that a copy of this executed Consent Agreement and Final Order is mailed or hand-delivered to Respondent. However, EPA will not seek to recover interest on any amount of the civil penalty that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a).
42. The cost of EPA's administrative handling of overdue debts will be charged and assessed monthly throughout the period the debt is overdue. 40 C.F.R. § 13.11(b). Pursuant to Appendix 2 of EPA's Resources Management Directives - Cash Management, Chapter 9, EPA will assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid.
43. A penalty charge of six percent per year will be assessed monthly on any portion of the civil penalty which remains delinquent for more than ninety (90) calendar days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d).
44. Thus, in accordance with the above provisions, to avoid the assessment of interest, late payment penalties, and handling charges on the penalty set forth herein, Respondent must pay the full amount of the civil penalty, in the manner directed, within thirty (30) days of the effective date of this Consent Agreement and accompanying Final Order.
45. Payment of the penalty in Paragraph 37 shall be made by cashier's check, certified check, or electronic transfer, Automated Clearing House ("ACH"), or an on line, internet payment as specified below. All payments shall be made payable to "Treasurer, United States of America," and reference the above case caption and docket number. Checks shall be mailed to the attention of:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P. O. Box 979077
St. Louis, MO 63197-9000
Contact: Eric Volck (513) 487-2105

Overnight deliveries shall be sent to:

U.S. Bank
Government Lockbox 979077
U.S. Environmental Protection Agency
Fines and Penalties
1005 Convention Plaza
Mail Station SL-MO-C2GL
St. Louis, MO 63101
Contact: (314) 418-1028

All electronic fund transfer (“EFT”) payments shall be directed to:

Federal Reserve Bank of New York
ABA = 021030004
Account = 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York NY 10045
Field Tag 4200 of the Fedwire message should read “D 68010727 Environmental
Protection Agency”

Payments made by ACH, also known as Remittance Express (“REX”) shall be directed to:

U.S Treasury REX/Cashlink ACH Receiver
ABA = 051036706
Account 310006, Environmental Protection Agency
CTX Format Transaction Code 22 - checking
5700 Rivertech Court
Riverdale, MD 20737
866-234-5681

An on-line, internet payment option, is also available through the United States Department of Treasury. This payment option can be accessed from www.pay.gov. Enter sfo 1.1 in the search field, open the form, and complete the required fields.

46. All payments made by check also shall reference the above case caption and docket number, CAA-03-2014-0051. At the same time that any payment is made, copies of any corresponding check or written notification confirming any electronic transfer through wire transfer, ACH, or internet payment shall be mailed to Lydia A. Guy, Regional Hearing Clerk (3RC00), U.S. EPA, Region III, 1650 Arch Street, Philadelphia, Pennsylvania 19103-2029,

to J. Robert Stoltzfus, Esq., Senior Assistant Regional Counsel (3RC10), U.S. EPA Region III, 1650 Arch Street, Philadelphia, Pennsylvania, 19103-2029, and to Bruce Augustine (3AP20), U.S. EPA Region III, 1650 Arch Street, Philadelphia, Pennsylvania, 19103-2029.

47. Respondent agrees not to deduct for federal tax purposes the civil penalty specified in, and any civil penalty amount paid pursuant to, this Consent Agreement and accompanying Final Order.
48. Each party to this action agrees to pay its own costs and attorney fees.
49. Payment of the penalty specified in Paragraph 37 in the manner set forth in this Consent Agreement and payment of any applicable interest, handling costs and/or late payment charges as set forth above shall constitute full and final satisfaction of all civil claims for penalties for the specific violations alleged in Section III of this Consent Agreement. Compliance with this Consent Agreement and accompanying Final Order shall not be a defense to any action commenced at any time for any other violation of any federal laws and regulations administered by EPA.
50. Respondent's failure to make timely payment of the civil penalty or any portion of the civil penalty provided herein may result in referral of this matter to the United States Attorney for enforcement of this Consent Agreement and the accompanying Final Order in the appropriate United States District Court. Additionally, Respondent's failure to make timely payment of the civil penalty or any portion of the civil penalty provided herein may result in the assessment of additional interest, penalties and/or late payment penalty charges.

V. Reservation of Rights

51. This Consent Agreement and the accompanying Final Order resolve only the civil claims for the specific violations alleged in Section III of this Consent Agreement. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. Nor shall anything in this Consent Agreement and Final Order be construed to limit the United States' authority to pursue criminal sanctions or other violations of the law. In addition, this settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in 40 C.F.R. § 22.18(c). Further, Complainant reserves any rights and remedies available to it under the Act, the regulations promulgated there under, and any other federal laws or regulations for which Complainant has jurisdiction, to enforce the provisions of this Consent Agreement and accompanying Final Order following its filing with the Regional Hearing Clerk.

VI. Effective Date

52. The effective date of this Consent Agreement and the accompanying Final Order is the date on which the Consent Agreement and Final Order is filed with the Regional Hearing Clerk of

VII. Entire Agreement

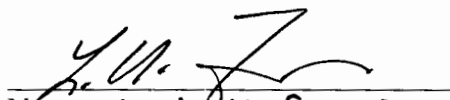
53. This Consent Agreement and the accompanying Final Order constitute the entire agreement and understanding of the parties concerning settlement of the above-captioned action and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Consent Agreement and the accompanying Final Order. Nothing in this Consent Agreement or the accompanying Final Order shall be construed to affect or limit in any way the obligation of Respondent to comply with all federal, state and local laws and regulations governing any activity required by this Consent Agreement and the accompanying Final Order.

VIII. Execution

54. The person signing this Consent Agreement on behalf of Respondent acknowledges and certifies by his/her signature that he/she is fully authorized to enter into this Consent Agreement and to legally bind Respondent, to the terms and conditions of this Consent Agreement and the accompanying Final Order.

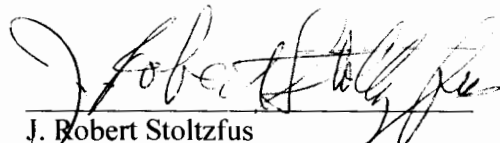
For Respondent Bayer CropScience LP:

Nov. 11, 2013
Date


Name: Linda U. Feuss
Title: Vice President
General Counsel and Secretary

For Complainant:

11/27/13
Date


J. Robert Stoltzfus
Senior Assistant Regional Counsel
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Accordingly, the Air Protection Division, United States Environmental Protection Agency, Region III, recommends that the Regional Administrator or his designee, the Regional Judicial Officer, issue the accompanying Final Order and thereby ratify this Consent Agreement and the terms and provisions herein.

12/20/2013
Date

Diana Esher
Diana Esher, Director
Air Protection Division
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103

Appendix A - Inadequate Monitoring Frequency for Valves at the Facility

ID	Component Tag	Inspection Date	Pass/Fail	Days Till Next Monitoring Event	Full Component ID
229094	1756	7/26/2006	Passed	384.59	VALVE 1756 LARVIN Larvin PAI
229095	1756	8/15/2007	Passed	510.00	VALVE 1756 LARVIN Larvin PAI
229131	1760	7/26/2006	Passed	384.59	VALVE 1760 LARVIN Larvin PAI
229132	1760	8/15/2007	Passed	510.00	VALVE 1760 LARVIN Larvin PAI
229178	1766	7/26/2006	Passed	384.59	VALVE 1766 LARVIN Larvin PAI
229179	1766	8/15/2007	Passed	510.00	VALVE 1766 LARVIN Larvin PAI
229201	1767	7/26/2006	Passed	384.59	VALVE 1767 LARVIN Larvin PAI
229202	1767	8/15/2007	Passed	510.00	VALVE 1767 LARVIN Larvin PAI
229408	1780	7/26/2006	Passed	384.59	VALVE 1780 LARVIN Larvin PAI
229409	1780	8/15/2007	Passed	510.00	VALVE 1780 LARVIN Larvin PAI
234556	2186	7/27/2006	Passed	383.59	VALVE 2186 LARVIN Larvin PAI
234557	2186	8/15/2007	Passed	510.00	VALVE 2186 LARVIN Larvin PAI
234617	2192	7/27/2006	Passed	383.59	VALVE 2192 LARVIN Larvin PAI
234618	2192	8/15/2007	Passed	510.00	VALVE 2192 LARVIN Larvin PAI
235268	2260	7/27/2006	Passed	383.57	VALVE 2260 LARVIN Larvin PAI
235269	2260	8/15/2007	Passed	510.00	VALVE 2260 LARVIN Larvin PAI
235692	2293	7/27/2006	Passed	383.49	VALVE 2293 LARVIN Larvin PAI
235693	2293	8/15/2007	Passed	510.00	VALVE 2293 LARVIN Larvin PAI
240060	2668	8/20/2007	Passed	507.00	VALVE 2668 LARVIN Larvin PAI
252104	3593	7/24/2006	Passed	393.59	VALVE 3593 LARVIN Larvin PAI
252105	3593	8/22/2007	Passed	509.00	VALVE 3593 LARVIN Larvin PAI
255060	3913	7/25/2006	Passed	393.69	VALVE 3913 LARVIN Larvin PAI
255061	3913	8/23/2007	Passed	509.00	VALVE 3913 LARVIN Larvin PAI
257216	4117	7/25/2006	Passed	393.63	VALVE 4117 LARVIN Larvin PAI
257217	4117	8/23/2007	Passed	509.00	VALVE 4117 LARVIN Larvin PAI
263636	4502	7/24/2006	Passed	394.62	VALVE 4502 LARVIN Larvin PAI
263637	4502	8/23/2007	Passed	509.00	VALVE 4502 LARVIN Larvin PAI
263640	4503	7/24/2006	Passed	394.62	VALVE 4503 LARVIN Larvin PAI
263641	4503	8/23/2007	Passed	509.00	VALVE 4503 LARVIN Larvin PAI
264500	4613	7/24/2006	Passed	411.47	VALVE 4613 LARVIN Larvin PAI
264501	4613	9/9/2007	Passed	494.00	VALVE 4613 LARVIN Larvin PAI
264504	4614	7/24/2006	Passed	411.47	VALVE 4614 LARVIN Larvin PAI
264505	4614	9/9/2007	Passed	494.00	VALVE 4614 LARVIN Larvin PAI
264508	4615	7/24/2006	Passed	411.47	VALVE 4615 LARVIN Larvin PAI
264509	4615	9/9/2007	Passed	494.00	VALVE 4615 LARVIN Larvin PAI
264512	4616	7/24/2006	Passed	411.47	VALVE 4616 LARVIN Larvin PAI
264513	4616	9/9/2007	Passed	494.00	VALVE 4616 LARVIN Larvin PAI
266449	4850	7/26/2006	Passed	409.66	VALVE 4850 LARVIN Larvin PAI

**BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, PA 19103**

In the Matter of	:	
	:	Docket No. CAA-03-2014-0051
Bayer CropScience LP	:	
Route 25	:	Proceeding Under Section 113(d)
Institute, WV 25112	:	of the Clean Air Act
	:	

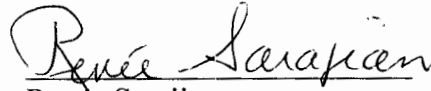
FINAL ORDER

The Preliminary Statement, General Provisions, Findings of Fact and Conclusions of Law, and other sections and terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated herein as if set forth at length.

NOW THEREFORE, pursuant to Section 113 of the Clean Air Act ("CAA"), as amended, 42 U.S.C. § 7413, and 40 C.F.R. Part 22, Bayer CropScience LP is hereby ordered to pay a civil penalty in the amount Nine Thousand, Three Hundred Dollars (\$9,300.00). Payment of the aforesaid civil penalty shall be made within thirty (30) days of the effective date of this Final Order.

The effective date of the accompanying Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk of U.S. EPA Region III.

Date: 12/30/13

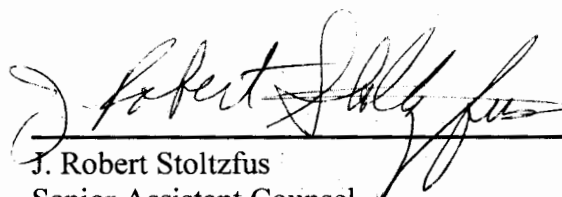

Renee Sarajian
Regional Judicial Officer
U.S. EPA Region III

CERTIFICATE OF SERVICE

I hereby certify that, on December 31, 2013, I electronically forwarded the foregoing Final Order and Consent Agreement for the Bayer CropScience matter, EPA Docket No. CAA-03-2014-0051, via email to:

Chintan Amin
Senior Counsel
Bayer Corporation
100 Bayer Road
Pittsburgh, PA 15205
Chintan.amin@bayer.com

Attorney for Defendant Bayer CropScience LP

A handwritten signature in black ink, appearing to read "J. Robert Stoltzfus", is written over a horizontal line. The signature is cursive and somewhat stylized.

J. Robert Stoltzfus
Senior Assistant Counsel
EPA Region III
1650 Arch Street
Philadelphia, PA 19103