



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

SEP 30 2008

REPLY TO THE ATTENTION OF:

LR-8J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Michael J. Zimmer  
General Manager  
CFC International, Inc.  
500 State Street  
Chicago Heights, Illinois 60411

Re: Consent Agreement and Final Order  
CFC International, Inc., located at 5400 East Avenue, Countryside, Illinois  
U.S. EPA ID: ILD 005 138 128  
Docket No: **RCRA-05-2008-0015**

Dear Mr. Zimmer:

Please find enclosed one copy of a fully executed Consent Agreement and Final Order (CAFO) in resolution of the above-captioned case. The original was filed on SEP 30 2008, 2008 with the Regional Hearing Clerk (RHC). The agreement contains the terms previously discussed to resolve this matter.

Please pay the civil penalty in the amount of \$41,000 in the manner prescribed in paragraph 65 of the CAFO, and reference all checks with the number BD 2750842R013 and docket number **RCRA-05-2008-0015**. Also, enclosed is a *Notice of Securities and Exchange Commission Registrant's Duty to Disclose Environmental Legal Proceedings*.

Thank you for your cooperation in resolving this matter.

Sincerely,

A handwritten signature in cursive script that reads "Willie H. Harris".

Willie H. Harris, P.E.  
Chief, RCRA Branch  
Land and Chemicals Division

Enclosure

## **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: )  
)  
**CFC INTERNATIONAL, INC.** )  
)  
) **DOCKET NO. RCRA-05-2008-0015**  
)  
**U.S. EPA ID NO. ILD005138128** )  
)  
) **Respondent** )  
\_\_\_\_\_ )

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**CONSENT AGREEMENT AND FINAL ORDER**

**I. JURISDICTION**

1. This is a civil administrative action instituted under Section 3008(a) of the Solid Waste Disposal Act, as amended, also known as the Resource Conservation and Recovery Act of 1976, as amended ("RCRA"), 42 U.S.C. § 6928(a). RCRA was amended in 1984 by the Hazardous Waste and Solid Waste Amendments of 1984 ("HSWA"). This action is also simultaneously commenced and concluded under Sections 22.1(a)(4), 22.13(b), 22.14(a)(1)-(3) and (8), 22.18(b)(2) and (3), and 22.37 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation, Termination or Suspension of Permits ("Consolidated Rules"), 40 C.F.R. Part 22.

2. Jurisdiction for this action is conferred upon the United States Environmental Protection Agency ("U.S. EPA") by Sections 2002(a)(1), 3006(b), and 3008 of RCRA, 42 U.S.C. §§ 6912(a)(1), 6926(b), and 6928.

3. The Complainant is, by lawful delegation, the Director, Land and Chemicals Division, Region 5, U.S. EPA.

4. 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.

5. 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. §§ 6921-6939) or of any state provision authorized pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926(b), 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.

6. 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=<sup>s</sup> base RCRA program effective January 31, 1986. 51 Fed. Reg. 3778 (January 31, 1986). The Administrator of U.S. EPA granted Illinois final authorization to administer certain HSWA and additional RCRA requirements effective March 5, 1988, 53 Fed. Reg. 126 (January 5, 1988); April 30, 1990, 55 Fed. Reg. 7320 (March 1, 1990); June 3, 1991, 56 Fed. Reg. 13595 (April 3, 1991); August 15, 1994, 59 Fed. Reg. 30525 (June 14, 1994); May 14, 1996, 61 Fed. Reg. 10684 (March 15, 1996); and October 4, 1996, 61 Fed. Reg. 40520 (August 5, 1996). The U.S. EPA-authorized Illinois regulations are codified at 35 Illinois Administrative Code ("IAC") Part 703 *et seq.* See also 40 C.F.R. § 272.700 *et seq.*

7. Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), provides U.S. EPA with the authority to enforce State regulations in those States authorized to administer a hazardous waste program.

8. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), requirements imposed pursuant to HSWA take effect immediately in all States.

9. Any violation of regulations promulgated pursuant to Subtitle C, Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6039, or of any State regulations approved by U.S. EPA pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, constitutes a violation of RCRA, subject to the assessment of civil or criminal penalties and compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

10. U.S. 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).

## II. ALLEGATIONS

11. The Respondent is CFC International, Inc., which is and was at all times relevant to this Consent Agreement and Final Order (“CAFO”) a corporation doing business in the State of Illinois. Respondent became a division of Illinois Tool Works, Inc., in June 2007.

12. Respondent is a "person" as defined by 35 IAC § 720.110 and Section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

13. Respondent is the owner and operator, as those terms are defined by 35 IAC § 720.110, of a manufacturing plant located at 5400 East Avenue, Countryside, Illinois 60525. This plant is hereinafter referred to as the “Facility”. As of March 21, 2007, the Facility ceased operations.

14. At all times relevant to this matter, the Facility is and was a “facility” as defined by 35 IAC § 720.110 and Section 1004(5) of RCRA, 42 U.S.C. § 6903(5).

15. On February 1, 2007, U.S. EPA conducted an inspection (“Inspection”) of the Facility to evaluate Respondent’s compliance with the applicable requirements of RCRA. At the time of the Inspection, Respondent was in the process of closing down the operations of the Facility.

16. At the time of the Inspection, Respondent performed holographic plating at the Facility.

17. At the time of the Inspection, Respondent was a generator of hazardous waste as those terms are defined by 35 IAC § 720.110.

18. Pursuant to 35 IAC § 720.110, “storage” is defined as the holding of hazardous waste for a temporary period at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.

19. Pursuant to 35 IAC § 720.110, “container” is defined as any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled.

**Count I: Failure to Have a Hazardous Waste Storage License or Interim Status**

20. Complainant incorporates paragraphs 1 through 19 of this Complaint as though set forth in this paragraph.

21. Pursuant to Section 3005(a) and (e) of RCRA, 42 U.S.C. §§ 6925(a) and (e), and the regulations at 35 IAC Part 703, a permit or interim status is required for the storage of hazardous waste.

22. A generator of hazardous waste may accumulate, without a permit or interim status, as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near the point of generation which is under the control of an operator of the process generating the waste, provided that, *inter alia*, all containers holding hazardous waste and being stored in

such satellite accumulation areas are labeled with either the words “Hazardous Waste” or with other words that identify the contents of the containers. See, 35 IAC § 722.134(c)(1)(B).

23. At the time of the Inspection, a 55-gallon container of electroplating waste was located in a satellite accumulation area at the Facility.

24. At the time of the Inspection, the container identified in the Paragraph 23 was a “container” as defined by 35 IAC § 720.110.

25. At the time of the Inspection, the material in the container identified in Paragraph 23 was “hazardous waste” as defined by 35 IAC §§ 720.110 and 721.103.

26. At the time of the Inspection, Respondent stored, as “storage” is defined by 35 IAC § 720.110, hazardous waste in the container identified in Paragraph 23.

27. At the time of the Inspection, the container identified in Paragraph 26 was not marked with either the words “Hazardous Waste” or with other words identifying the contents of the container.

28. By failing to label or clearly mark the container identified in Paragraph 23 with the words “Hazardous Waste” or with other words identifying the contents of the container, Respondent failed to comply with the permit exemption conditions at 35 IAC § 722.134(c)(1)(B).

29. A generator may accumulate hazardous waste on-site for 90 days or less without a permit or interim status provided that the generator complies with, *inter alia*, the requirements for owners or operators in Subparts C and D of 35 Ill. Adm. Code 725. See, 35 IAC § 722.134(a)(4).

30. In order to be exempt from the requirement to have a permit or interim status for the

storage of hazardous waste for less than 90 days, a generator of hazardous waste must maintain certain personnel training records at the Facility. These records include, but are not limited to: 1) the job titles for each position related to hazardous waste management and the name(s) of the employee(s) filling each job; 2) a written job description for each position above; and 3) records documenting that the training or job experience has been given to and completed by facility personnel. 35 IAC § 725.116(d). For current personnel, those records must be kept until closure of the Facility. 35 IAC § 725.116(e).

31. At time of inspection, a 55-gallon drum was located in the flammable materials room at the Facility.

32. The drum identified in paragraph 31 contained hazardous waste as defined by 35 IAC § 720.110.

33. Respondent was storing hazardous waste, as "storage" is defined by 3 IAC § 720.110, in the drum identified in paragraph 31.

34. At the time of the Inspection, Respondent did not maintain at the Facility the following documents and records for current personnel: 1) the job titles for each position related to hazardous waste management and the name(s) of the employee(s) filling each job; 2) a written job description for each position above; and 3) records documenting that the training or job experience has been given to and completed by facility personnel.

35. At the time of the Inspection, the Facility was not closed.

36. By failing to maintain personnel training records at the Facility as described in paragraph 34, Respondent failed to comply with the permit exemption conditions under 35 IAC §§ 722.134(a)(4) and 725.116(d).

37. In order to be exempt from the requirement to have a permit or interim status for the



storage of hazardous waste for less than 90 days, a generator of hazardous waste must maintain a copy of the facility contingency plan at the Facility. 35 IAC § 725.153(a).

38. At time of the Inspection, Respondent did not have a copy of the facility contingency plan at the Facility.

39. By failing to have a copy of the facility contingency plan at the Facility at the time of the Inspection, Respondent failed to comply with the permit exemption conditions under 35 IAC §§ 722.134(a)(4) and 725.153(a).

40. Pursuant to 35 IAC § 722.134(b), a generator that accumulates hazardous waste for more than 90 days is the operator of a storage facility and is subject to permitting requirements.

41. At the time of the Inspection, the drum identified in paragraph 31 was marked with an accumulation start date of January 12, 2006.

42. The drum identified in paragraph 31 was not manifested off-site until March 22, 2007.

43. Respondent stored, as "storage" is defined in 35 IAC § 720.110, hazardous waste in the drum identified in paragraph 31 from January 12, 2006, to March 22, 2007, a total of 344 days over the 90-day limit in 35 IAC § 722.134(b).

44. Respondent has never had a permit pursuant to Section 3005(a) of RCRA, 42 U.S.C. § 6925(a) or 35 IAC Part 703 to store hazardous waste at the Facility.

45. Respondent has never had interim status to store hazardous waste pursuant to Section 3005(e) of RCRA, 42 U.S.C. § 6925(e), or 35 IAC Part 703 at the Facility.

46. By storing hazardous waste at the Facility without a permit, interim status or qualifying for a 90 day exemption, Respondent violated Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e), and the regulations at 35 IAC Part 703.

### III. STIPULATIONS

47. U.S. EPA and Respondent agree that the settlement of this matter pursuant to 22.13(b) of the Consolidated Rules, 40 C.F.R. § 22.13(b), is in the public interest and that the entry of this CAFO without engaging in litigation is the most appropriate means of resolving this matter.

48. Respondent admits the jurisdictional allegations of this CAFO. Respondent agrees not to contest such jurisdiction in any proceeding to enforce the provisions of this CAFO.

49. Respondent neither admits nor denies the factual allegations of this CAFO and makes no admissions of violation of law or rule or liability in entering into this CAFO.

50. Respondent consents to the issuance of this CAFO, all of the conditions of this CAFO, and the assessment of the civil penalty as outlined in Section IV of this CAFO.

51. Respondent waives any and all rights under any provisions of law to a hearing on the allegations contained in this CAFO. Respondent also waives any right to contest or appeal the factual allegations in Section II of this CAFO and any right to appeal the terms and conditions of the Consent Agreement or the Final Order that accompanies the Consent Agreement.

52. Respondent's failure to timely comply with any provision of this CAFO may subject Respondent to a civil action pursuant to Section 3008(c) of RCRA, 42 U.S.C. § 6928(c), to collect penalties for any noncompliance with the CAFO (as well as injunctive relief) and any unpaid portion of the assessed penalty, together with interest, handling charges and nonpayment penalties as set forth above. Respondent waives any rights it may possess in law or equity to challenge the authority of U.S. EPA to bring a civil action in the appropriate United States

District Court to compel compliance with this CAFO and/or seek an additional penalty for noncompliance with the CAFO. In any such collection action, the validity, amount and appropriateness of this CAFO or the penalty and charges assessed hereunder will not be subject to review.

53. This CAFO constitutes a settlement by U.S. EPA of all claims for civil penalties pursuant to Section 3008(a) of RCRA, 42 U.S.C. Section 6928(a), for the violations alleged in Section II of this CAFO. Compliance with this CAFO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by U.S. EPA, and it is the responsibility of the Respondent to comply with such laws and regulations.

54. Nothing in this CAFO shall be construed to relieve Respondent from its obligation to comply with all applicable federal, state and local statutes and regulations, including the Subtitle C requirements at 40 C.F.R. parts 260 through 270 and 35 IAC Part 703 *et seq.*

55. Nothing in this CAFO is intended to, nor shall be construed to, operate in any way to resolve any criminal liability of Respondent arising from the violations alleged in this CAFO. Notwithstanding any other provision of this CAFO, U.S. EPA expressly reserves any and all rights to bring an enforcement action pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at the Facility may present an imminent and substantial endangerment to health or the environment. U.S. EPA also expressly reserves the right: (a) for any matters other than violations alleged in this CAFO, to take any action authorized under Section 3008 of RCRA, 42 U.S.C. § 6928; (b) to enforce compliance

with the applicable provisions of the Illinois Administrative Rules; (c) to take any action under 40 C.F.R. Parts 124 and 270; and (d) to enforce compliance with this CAFO.

56. Nothing in this agreement prohibits, alters, or in any way limits U.S. EPA's ability to seek any other remedies or sanctions available by virtue of Respondent's violation of this agreement or of the statutes and regulations upon which this agreement is based, or for Respondent's violation of any applicable provision of law.

57. This CAFO constitutes the entire settlement between the parties and constitutes final disposition of the violations alleged in Section II of this CAFO.

58. Each party shall bear its own costs and attorneys fees in connection with the action resolved by this CAFO.

59. CAFO shall become effective on the date it is filed with the Regional Hearing Clerk, Region 5.

60. Respondent shall give notice and a copy of this CAFO to any successor in interest prior to any transfer of ownership or operational control of the Facility. This CAFO is binding on Respondent and any successors in interest.

#### **IV. CONSENT AGREEMENT**

61. Respondent shall maintain compliance with all requirements and prohibitions governing the generation, storage, treatment and disposal of hazardous waste, codified at or incorporated into the Illinois Administrative Rules and 40 C.F.R. Parts 260 through 279.

62. 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, 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 \$27,500 per day for each violation of Subtitle C of RCRA occurring or continuing on or after January 31, 1997, and may assess a civil penalty of up to \$32,500 per day for each violation that occurred after March 15, 2004.

63. U.S. EPA determined the proposed civil penalty in accordance with Section 3008 of RCRA, 42 U.S.C. § 6928. In assessing a civil penalty, the Administrator of U.S. EPA must consider “the seriousness of the violation and any good faith efforts to comply with applicable requirements.” Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3). U.S. EPA has considered the facts and circumstances of this case with specific reference to U.S. EPA's 1990 RCRA Civil Penalty Policy. Based on an analysis of the above factors, U.S. EPA has determined that an appropriate civil penalty to settle this action is \$ 41,000.00 to be paid as specified below.

64. Respondent agrees not to claim or attempt to claim a Federal income tax deduction or credit covering all or any part of the cash civil penalty paid to the U.S. Treasury.

65. Within 30 days following the effective date of this CAFO, Respondent shall pay a civil penalty in the amount of \$ 41,000.00. Payment shall be made by certified or cashier's check, payable to “Treasurer, the United States of America”, and shall be sent to

U.S. EPA, Region 5  
Fines and Penalties  
Cincinnati Finance Center  
P.O. Box 979077  
St. Louis, MO 63197-9000

The check shall reference the name of Respondent and the Docket Number of this CAFO.

Interest and late charges shall be paid as specified below.

66. Upon payment of the civil penalty, Respondent shall send to each of the persons listed below a copy of the check and a transmittal letter referencing the name of Respondent and the docket number of this CAFO:

Regional Hearing Clerk  
U.S. EPA, Region 5  
77 West Jackson Blvd. (E-13J)  
Chicago, Illinois 60604-3590

Charles V. Mikalian  
Associate Regional Counsel  
U.S. EPA, Region 5  
Office of Regional Counsel (C-14J)  
77 West Jackson Blvd.  
Chicago, Illinois 60604-3590

Jamie L. Paulin  
RCRA Branch (LR-8J)  
U.S. EPA  
77 West Jackson Blvd.  
Chicago, Illinois 60604-3590

67. Pursuant to 31 U.S.C. § 3717, Respondent shall pay the following amounts any amount overdue under this CAFO:

a. **Interest.** Any unpaid portion of a civil penalty shall bear interest at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Interest will therefore begin to accrue on a civil penalty if it is not paid by the last date required. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 4 C.F.R. § 102.13(c).

b. **Monthly Handling Charge.** Respondent shall pay a late payment handling charge of \$15.00 on any late payment, with an additional charge of \$15.00 for each subsequent 30 calendar day period over which an unpaid balance remains.

c. **Payment Penalty.** On any portion of a civil penalty more than 90 calendar days past due, Respondent shall pay a non payment penalty of six percent per annum, which will accrue from the date the penalty payment became due and is not paid. This non payment is in addition to charges which accrue or may accrue under subparagraphs (a) and (b) above.

**V. SIGNATORIES**

Each undersigned representative of a party to this CAFO certifies that he or she is fully authorized to enter into the terms of this CAFO and to bind legally such party to this document.

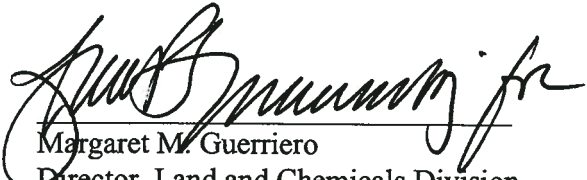
Agreed to this 17<sup>th</sup> day of ~~MARCH~~  
September, 2008.



\_\_\_\_\_  
Michael J. Zimmer  
General Manager  
CFC International, Inc., an ITW company

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Agreed to this 25 day of Sept, 2008.

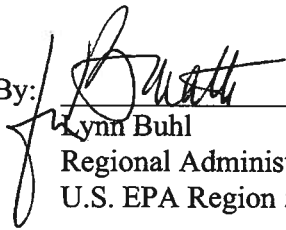


\_\_\_\_\_  
Margaret M. Guerriero  
Director, Land and Chemicals Division  
U.S. Environmental Protection Agency, Region 5  
Complainant

**FINAL ORDER**

Respondent is hereby ORDERED to comply with all of the terms of the foregoing Consent Agreement, effective immediately upon filing of this CAFO with the Regional Hearing Clerk. This Order disposes of this matter pursuant to 40 C.F.R. §§ 22.18 and 22.31.

Ordered this 30<sup>th</sup> day of September, 2008.

By:   
Lynn Buhl  
Regional Administrator  
U.S. EPA Region 5

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U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
SEP 19 2008  
OFFICE OF REGIONAL  
COUNSEL



**CASE NAME:** CFC International, Inc.  
**DOCKET NO:** RCRA-05-2008-0015

**CERTIFICATE OF SERVICE**

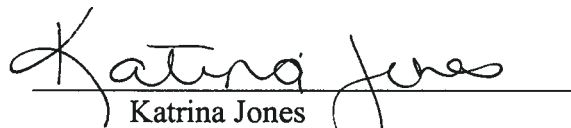
I hereby certify that today, I filed the original of this **Consent Agreement and Final Order** and this **Certificate of Service** in the office of the Regional Hearing Clerk (E-13J), United States Environmental Protection Agency, Region 5, 77 W. Jackson Blvd., Chicago, IL 60604-3590.

I further certify that I then caused true and correct copies of the filed document to be mailed via Certified Mail, Return Receipt Requested to the following:

Michael J. Zimmer  
General Manager  
CFC International, Inc.  
500 State Street  
Chicago Heights, Illinois 60411

Return Receipt # 7001 0320 0006 1448 7418

Dated: 30 sep 08



Katrina Jones  
Administrative Program Assistant  
United States Environmental Protection Agency  
Land and Chemicals Division -RCRA Branch  
77 W. Jackson Boulevard – LR-8J  
Chicago, IL 60604-3590  
(312) 353-5882

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