



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

January 21, 2021

**VIA E-MAIL**  
**DELIVERY RECEIPT REQUESTED**

Dale A. Guariglia, Partner  
Bryan Cave Leighton Paisner LLP  
One Metropolitan Square, 211 North Broadway, Suite 3600  
St. Louis, MO 63102 USA

Email: [dale.guariglia@bclplaw.com](mailto:dale.guariglia@bclplaw.com)

Dear Mr. Guariglia:

Enclosed is a file-stamped Consent Agreement and Final Order (CAFO) which resolves Research Organics LLC, docket no. CAA-05-2021-0006. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on January 21, 2021.

Pursuant to paragraph 58 of the CAFO, Research Organics LLC must pay the civil penalty within 45 days of the filing date. Your electronic funds transfer must display the case name and case docket number.

Please direct any questions regarding this case to Marcy A. Toney, Office of Regional Counsel, 312- 886-3186.

Sincerely,

SARAH  
MARSHALL

Digitally signed by  
SARAH MARSHALL  
Date: 2021.01.12  
10:22:47 -06'00'

Sarah G. Marshall, Chief  
Air Enforcement and Compliance Assurance Section (MI/WI)

Enclosure

cc: Ann Coyle, Regional Judicial Officer/via electronic mail  
Regional Hearing Clerk/via electronic mail  
Marcy Toney/via electronic mail  
Albana Bega/[bega.albana@epa.gov](mailto:bega.albana@epa.gov)  
Eric Tackett, Research Organics LLC, [eric.tackett@milliporesigma.com](mailto:eric.tackett@milliporesigma.com)  
Michael Shuler, Research Organics LLC, [michael.shuler@milliporesigma.com](mailto:michael.shuler@milliporesigma.com)  
Brad Zelch, Research Organics LLC, [brad.zelch@milliporesigma.com](mailto:brad.zelch@milliporesigma.com)  
Leigh Davidson, Research Organics LLC, [leigh.davidson@milliporesigma.com](mailto:leigh.davidson@milliporesigma.com)

Bob Hodanbosi, Ohio EPA, [bob.hodanbosi@epa.ohio.gov](mailto:bob.hodanbosi@epa.ohio.gov)  
James Kavalec, Ohio EPA, [james.kavalec@epa.ohio.gov](mailto:james.kavalec@epa.ohio.gov)  
David Hearne, Ohio EPA, [dhearne@city.cleveland.oh.us](mailto:dhearne@city.cleveland.oh.us)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

<b>In the Matter of:</b>	)	<b>Docket No.</b> CAA-05-2021-0006
	)	
<b>Research Organics LLC Cleveland, Ohio,</b>	)	<b>Proceeding to Assess a Civil Penalty Under Section 113(d) of the Clean Air Act, 42 U.S.C. § 7413(d)</b>
	)	
<b>Respondent.</b>	)	
	)	Type text here

**Consent Agreement and Final Order**

**Preliminary Statement**

1. This is an administrative action commenced and concluded under Section 113(d) of the Clean Air Act (the CAA), 42 U.S.C. § 7413(d), and Sections 22.1(a)(2), 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 Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency (EPA), Region 5.

3. Respondent is Research Organics LLC, a corporation doing business in Ohio.

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. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations 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.

### **Statutory and Regulatory Background**

9. Pursuant to Section 112(b) of the CAA, 42 U.S.C. § 7412(b), EPA designates hazardous air pollutants (HAPs) which present or may present a threat of adverse effects to human health or the environment.

10. Section 112(a) of the CAA, 42 U.S.C. § 7412(b), defines "major source" as any stationary source or group of stationary sources located 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 (tpy) or more of any HAP or 25 tpy or more of any combination of HAPs.

11. Section 112(c) and (d) of the CAA, 42 U.S.C. § 7412(c), requires EPA to publish a list of categories of sources that EPA finds present a threat of adverse effects to human health or the environment due to emissions of HAPs, and to promulgate emission standards for each source category. These standards are known as "national emission standards for hazardous air pollutants" or NESHAPs. EPA codifies these requirements at 40 C.F.R. Parts 61 and 63.

12. The NESHAPs in 40 C.F.R. Part 63 are national technology-based performance standards for HAP sources in each category that become effective on a specified date. The purpose of these standards is to ensure that all sources achieve the maximum degree of reduction in emissions of HAPs that EPA determines is achievable for each source category.

13. Section 112(i)(3) of the CAA, 42 U.S.C. § 7412(i)(3), prohibits any person subject to a NESHAP from operating an existing source in violation of a NESHAP after its effective date. See 40 C.F.R. § 63.4.

The NESHAP General Provisions (“Subpart A”)

14. Subpart A, at 40 C.F.R. Part 63, contains general provisions applicable to the owner or operator of any stationary source that contains an affected source subject to a relevant standard in 40 C.F.R. Part 63, to the extent specified in such standard.

15. Subpart A, at 40 C.F.R. § 63.2, defines “affected source” as the collection of equipment, activities, or both within a single contiguous area and under common control that is included in a CAA Section 112(c) source category or subcategory for which a Section 112(d) standard or other relevant standard is established pursuant to Section 112 of the CAA.

16. Subpart A, at 40 C.F.R. § 63.2, defines “existing source” as any affected source that is not a new source.

17. Subpart A, at 40 C.F.R. § 63.2, defines “new source” as any affected source the construction or reconstruction of which is commenced after EPA first proposes a relevant emission standard under 40 C.F.R. Part 63 establishing an emission standard applicable to such source.

18. Subpart A, at 40 C.F.R. § 63.4(a)(1), prohibits an owner or operator subject to the provisions of this part to operate any affected source in violation of the requirements of this part.

19. Subpart A, at 40 C.F.R. § 63.6(e)(1), states “[a]t all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.”

NESHAP for Miscellaneous Organic Chemicals Manufacturing (MON or “Subpart FFFF”)

20. On November 10, 2003, EPA promulgated Subpart FFFF, 68 Fed. Reg. 63888 (November 10, 2003). The owner or operator of an existing affected source as of November 10, 2003, was required to come into compliance with the provisions of Subpart FFFF no later than three years later, or by November 10, 2006, which was subsequently revised to require compliance by no later than May 10, 2008, as currently provided by 40 C.F.R. § 63.2445(b).

21. Subpart FFFF, at 40 C.F.R. § 63.2435(a), applies to owners or operators of miscellaneous organic chemicals manufacturing process units (MCPUs) that are located at, or are part of, a major source of HAP emissions, as defined in Section 112(a) of the CAA, 42 U.S.C. § 7412(a).

22. Subpart FFFF, at 40 C.F.R. § 63.2550, defines “miscellaneous organic chemical manufacturing process” as all equipment which collectively functions to produce a product or isolated intermediate that is “material” described in 40 C.F.R. § 63.2435(b). “Process” includes any, all or a combination of reaction, recovery, separation, purification, or other activity, operation, manufacture, or treatment that are used to produce a product or isolated intermediate.

23. Subpart FFFF, at 40 C.F.R. § 63.2435(b), states that an MCU includes all equipment necessary to operate a miscellaneous organic chemical manufacturing process, as defined in 40 C.F.R. § 63.2550, that satisfies the conditions specified in paragraphs (b)(1) through (3) of 40 C.F.R. § 63.2435. An MCU also includes any assigned storage tanks and transfer racks; equipment in open systems that is used to convey or store water having the same concentration and flow characteristics as wastewater; and components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems that are used to manufacture any

material or family of materials described in paragraphs (b)(1)(i) through (v) of 40 C.F.R. § 63.2435.

24. Subpart FFFF, at 40 C.F.R. § 63.2540, provides that owners or operators of MCPUs must also comply with the requirements of Subpart A, as identified in Table 12 of Subpart FFFF.

25. Subpart FFFF, at 40 C.F.R. § 63.2450 (a), states in pertinent part that owners and operators of MCPUs must be in compliance with the emission limits and work practice standards in Tables 1 through 7 as specified therein, must meet the applicable requirements specified in 40 C.F.R. §§ 63.2455 through 2490 as specified therein, and must meet the notification, reporting, and recordkeeping requirements specified in 40 C.F.R. §§ 63.2515, 63.2520, and 63.2525. References herein to Tables refer to tables included in 40 C.F.R. Part 63, Subpart FFFF.

26. Subpart FFFF, at 40 C.F.R. § 63.2450(c), with requirements for combined emission streams, states that when organic HAP emissions from different emission types (e.g., continuous process vents, batch process vents, storage tanks, transfer operations, and waste management units) are combined, then the owner or operator of an MCPU must comply with the requirements in 40 C.F.R. §63.2450(c)(1) or 63.2450(c)(2).

27. Subpart FFFF, at 40 C.F.R. § 63.2450(e)(1), requires that (except when complying with 40 C.F.R. § 63.2485 for wastewater streams), if the owner or operator of an MCPU is reducing the organic HAP emissions by venting emissions through a closed-vent system to any combination of control devices (except a flare) or recovery devices, the owner or operator must meet the requirements of Subpart SS at 40 C.F.R. § 63.982(c) and the requirements referenced therein.

28. Subpart FFFF, at 40 C.F.R. § 63.2460(a), with requirements for batch process vents, states in pertinent part that owners or operators of MCPUs must meet each applicable emission limit in Table 2, and each applicable requirement specified in paragraphs (b) and (c) of 40 C.F.R. § 63.2460.

29. Table 2 of Subpart FFFF requires owners or operators of MCPUs that are subject to 40 C.F.R. § 2460 to reduce collective uncontrolled organic HAP emissions from the sum of all Group 1 batch process vents within each process with Group 1 batch process units by  $\geq 98$  percent (%) by weight by venting emissions from a sufficient number of the vents through one or more closed-vent systems to any combination of control devices (except a flare).

30. Table 2 of Subpart FFFF requires owners or operators of MCPUs that are subject to 40 C.F.R. § 2460 to use either: (i) a halogen reduction device after the combustion control device, and to reduce overall emissions of hydrogen halide and halogen HAP by  $\geq 99\%$ , or to  $\leq 0.45$  kilograms per hour, or to a concentration  $\leq 20$  part per million by volume, for halogenated Group 1 batch process vents for which the owner or operator uses a combustion device to control organic HAP emissions; or (ii) a halogen reduction device before the combustion control device to reduce the halogen atom mass emission rate to  $< 0.45$  kg/hr or to a concentration  $< 20$  ppmv.

NESHAP for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process (“Subpart SS”)

31. Subpart SS, at 40 C.F.R. § 63.982(c), states that owners or operators who control emissions through a closed vent system to a nonflare control device shall meet the requirements in §63.983 for closed vent systems and the applicable recordkeeping and reporting requirements of §§63.998 and 63.999.



32. Subpart SS, at 40 C.F.R. § 63.998(b)(1), states that where this subpart requires a continuous record, the owner or operator shall maintain a record as specified in paragraphs (b)(1)(i) through (iv) of § 63.998.

33. Subpart SS, at 40 C.F.R. § 63.988(c)(1) states that where an incinerator other than a catalytic incinerator is used, a temperature monitoring device shall be installed in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs.

34. The Administrator of EPA (“the Administrator”) may assess a civil penalty of up to \$48,192 per day of violation up to a total of \$385,535 for violations that occurred after November 2, 2015 under Section 113(d)(1) of the CAA, 42 U.S.C. § 7413(d)(1), and 40 C.F.R. Part 19.

35. Section 113(d)(1) limits the Administrator’s authority to matters where the first alleged date of violation occurred no more than 12 months prior to initiation of the administrative action, except where the Administrator and the Attorney General of the United States jointly determine that a matter involving a longer period of violation is appropriate for an administrative penalty action.

36. The Administrator and the Attorney General of the United States, each through their respective delegates, have determined jointly that an administrative penalty action is appropriate for the period of violations alleged in this CAFO.

#### **EPA’s Factual Allegations and Alleged Violations**

37. Research Organics LLC (“Facility” or “Research Organics”) owns and operates a batch specialty chemical manufacturing facility at 4353 East 49th Street, Cleveland, Ohio.

38. The Facility manufactures various biological buffers and amino acids using a variety of reactions that use HAPs, such as methanol and hydrochloric acid. The Facility has NAICS code 325199.

39. Research Organics emits methanol and other HAPs in a combined quantity of over 25 tpy, and is thus a major source of HAPs, as defined in Section 112(a) of the CAA, 42 U.S.C. § 7412(a).

40. On April 30, 2012, Research Organics submitted to Ohio Environmental Protection Agency (OEPA), Cleveland Department of Public Health, Division of Air Quality, a voluntary disclosure form stating that the Facility's potential to emit was revised from synthetic minor to major source of HAPs, and, as a result, the Facility became subject to all the requirements of Subpart FFFF.

41. On May 17, 2013, Research Organics submitted to the Cleveland Department of Public Health (with copies directed to OEPA and EPA) its Subpart FFFF Initial Notification, pursuant to 40 C.F.R. § 63.2515(b).

42. On February 9, 2015, Research Organics submitted to OEPA and EPA its Notification of Compliance Status (NOCS) report, pursuant to 40 C.F.R. § 63.2520(d).

43. On July 6, 2016, OEPA issued to Research Organics an operating permit effective July 27, 2016, permit number P0112455 ("Title V permit") for its Facility.

44. From August 14, 2017 through August 16, 2017, EPA conducted an unannounced CAA investigation of the Facility for compliance with Subpart FFFF ("2017 Inspection").

45. According to the Research Organics' 2015 NOCS report, the batch manufacturing process includes multiple steps and equipment units, generally including heating raw materials and solvents (primarily methanol, isopropanol, and water), in reactors, followed by cooling in

crystallizers/chillers, separation of sold product in centrifuges, and drying in tumble dryers. The Facility manufactures multiple products and not all products required all these steps or equipment units, and some steps may be used more than once. Different equipment units are connected (or disconnected) as necessary for a specific product.

46. According to the Research Organics's 2015 NOCS report, the Facility contains both Group 1 and Group 2 batch process vents and Group 1 wastewater streams, but has only Group 2 storage or wastewater tanks. Organic HAP emissions from the Group 1 process vents are captured by a closed-vent system and routed to what the NOCS report describes as an "enclosed ground flare" or as a "flare" and the halogen HAP emissions from MPCU equipment amounting to more than 1,000 lb/year are captured by a closed-vent system and routed to a caustic soda scrubber. The Group 1 wastewater streams are sent to a waste collection tank (hazardous waste tank) for offsite disposal as hazardous waste.

47. According to Research Organics's 2015 NOCS report, the enclosed ground flare "is monitored using a 'fire eye' ultraviolet (UV) flame detector to continuously monitor that the pilot flame is present as required by 40 C.F.R. 63.987(c)." The NOCS report does not describe any other monitoring used for the "enclosed ground flare," and the provisions of 40 C.F.R. § 63.987 are required for only for flares and are not required for other combustion-based control devices like "incinerators," as defined in 40 C.F.R. § 63.981.

48. The Facility's operations result in multiple vent emission streams, including vent streams with organic HAP but no hydrogen halide or halogen HAP; vent streams with hydrogen halide or halogen HAP but no organic HAP; and vent streams with both organic HAP and hydrogen halide or halogen HAP.

49. As described in a Compliance Test Report dated February 25, 2014, the Facility arranged for emissions testing of the enclosed ground flare (referred to as the “Enclosed Flare” in the report) on February 12-13, 2014, for the purpose of demonstrating “compliance with the Ohio Environmental Protection Agency Permit No. P0114439 and with 40 C.F.R. Part 63, Subparts SS and FFFF.” The compliance test report provided information on emissions from the enclosed ground flare, the enclosed ground flare’s destruction efficiency for hazardous organic compounds, and visual emissions. The test for destruction efficiency consisted of measuring inlet and outlet emissions from the enclosed flare over three one-hour long test runs. Table 2.2 reported an average destruction efficiency of 99.54% at a temperature of 509 degrees Fahrenheit (°F) averaged over three runs. The temperature 509 °F thus, potentially represents – provided the applicable requirements for performance tests were met - that temperature at which the destruction efficiency of the enclosed ground flare might comply with the requirements of Subpart FFFF. Nevertheless, this result was not characterized in the Compliance Test Report as an operating limit for the operations of the enclosed ground flare, nor was it reported in the NOCS report as an operating limit.

50. During the 2017 Inspection, EPA observed that the control device described in the NOCS as the “enclosed ground flare” had an enclosure around the flame.

51. During the 2017 Inspection, EPA recorded a forward-looking infrared (FLIR) Video 3 (MOV 1864) of the control device showing un-combusted hydrocarbons leaving the stack.

52. On February 13, 2018, Research Organics submitted to EPA via e-mail, in response to an EPA e-mail dated February 13, 2018, a manufacturer specification and cost data about the control device described in the NOCS report as an enclosed ground flare. The

manufacturer specification recommended a minimum temperature of 400 °F to achieve a 95% VOC destruction efficiency. The manufacturer specification describes the position of the pilot light inside of the flare to be enclosed at the bottom of the stack, the assist air blower to be at the bottom of the stack with adjustable dampers to control air flow, and the assist gas control valve and quench air dampers modulate independently to maintain the combustor temperature.

53. On June 28, 2018, EPA issued a Finding of Violation (FOV) to Research Organics which contained eleven alleged violations set forth in paragraph 112 through 119 of the FOV.

54. Paragraph 112 of the FOV alleged that, as a result of improperly classifying the "enclosed ground flare" as a flare, rather than an enclosed combustion device, Research Organics failed to reduce organic HAP emissions from batch process vents in violation of Subpart A at 40 C.F.R. § 63.4, and Subpart FFFF at 40 C.F.R. § 63.2460(a).

55. Paragraph 121 of the FOV also alleged that Research Organics failed to operate and maintain the enclosed combustion device in a manner consistent with safety and good air pollution control practices for minimizing emissions, in violation of Subpart FFFF at 40 C.F.R. § 63.2540 and Subpart A at 40 C.F.R. § 63.6(e)(1).

56. On July 27, 2018, representatives of Research Organics and EPA met to discuss the FOV. At the July 27, 2018, meeting, and on August 9, 2019, August 21, 2019, September 30, 2019, December 16, 2019, May 1, 2020, and July 14, 2020, Research Organics provided additional information to EPA regarding the June 28, 2018, FOV allegations. Based on the information that Research Organics provided, EPA determined that the allegations set forth in Sections 113 through 120, and 122 of the FOV had been adequately resolved.

### Civil Penalty

57. Based on analysis of the factors specified in Section 113(e) of the CAA, 42 U.S.C. § 7413(e), the facts of this case, cooperation, and prompt return to compliance, Complainant has determined that an appropriate civil penalty to settle this action is \$47,500.

58. Within 45 days after the effective date of this CAFO, Respondent must pay a \$47,500 civil penalty by an on-line payment. To pay on-line, go to [www.pay.gov](http://www.pay.gov). Use the Search Public Forms option on the tool bar and enter SFO 1.1 in the search field. Open the form and complete the required fields.

59. Respondent must send a notice of payment that states Respondent's name and the docket number of this CAFO to EPA at the following addresses when it pays the penalty:

Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency, Region 5  
[r5airenforcement@epa.gov](mailto:r5airenforcement@epa.gov)

James Morris  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 5  
[Morris.james@epa.gov](mailto:Morris.james@epa.gov)

Regional Hearing Clerk (E-19J)  
U.S. Environmental Protection Agency, Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

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

61. If Respondent does not pay timely the civil penalty, EPA may request the Attorney General of the United States to bring an action to collect any unpaid portion of the penalty with interest, nonpayment penalties and the United States enforcement expenses for the collection action under Section 113(d)(5) of the CAA, 42 U.S.C. § 7413(d)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

62. Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any overdue amount from the date payment was due at a rate established by the Secretary of the Treasury pursuant to 26 U.S.C. § 6621(a)(2). Respondent must pay the United States enforcement expenses, including but not limited to attorneys fees and costs incurred by the United States for collection proceedings. In addition, Respondent must pay a quarterly nonpayment penalty each quarter during which the assessed penalty is overdue. This nonpayment penalty will be 10 percent of the aggregate amount of the outstanding penalties and nonpayment penalties accrued from the beginning of the quarter. 42 U.S.C. § 7413(d)(5).

### **General Provisions**

63. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: [morris.james@epa.gov](mailto:morris.james@epa.gov) (for Complainant), and [leigh.davidson@milliporesigma.com](mailto:leigh.davidson@milliporesigma.com), [eric.tackett@milliporesigma.com](mailto:eric.tackett@milliporesigma.com), [michael.shuler@milliporesigma.com](mailto:michael.shuler@milliporesigma.com), [brad.zelch@milliporesigma.com](mailto:brad.zelch@milliporesigma.com), and [dale.guariglia@bcplaw.com](mailto:dale.guariglia@bcplaw.com) (for Respondent). The parties waive their right to service by the methods specified in 40 C.F.R. § 22.6.

64. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in this CAFO and the FOV.

65. The CAFO does not affect the rights of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violation of law.

66. This CAFO does not affect Respondent's responsibility to comply with the CAA and other applicable federal, state and local laws. Except as provided in paragraph 64, above, compliance with this CAFO will not be a defense to any actions subsequently commenced pursuant to federal laws administered by EPA.

67. Respondent certifies that it is complying fully with NESHAP Subpart A, and NESHAP Subpart FFFF.

68. This CAFO constitutes an “enforcement response” as that term is used in EPA’s Clean Air Act Stationary Civil Penalty Policy to determine Respondent’s “full compliance history” under Section 113(e) of the CAA, 42 U.S.C. § 7413(e).

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

70. Each person signing this consent 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.

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

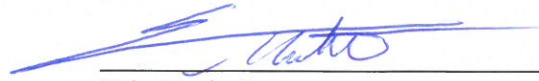
72. This CAFO constitutes the entire agreement between the parties.



**Consent Agreement and Final Order  
In the Matter of: Research Organics LLC**

**For Research Organics LLC, Respondent**

Jan 05<sup>th</sup>, 2011  
Date

  
Eric Tackett  
Vice President  
Research Organics LLC

**Consent Agreement and Final Order  
In the Matter of: Research Organics LLC**

**United States Environmental Protection Agency, Complainant**

1/15/21

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Date

**MICHAEL  
HARRIS**

Digitally signed by  
MICHAEL HARRIS  
Date: 2021.01.15  
10:55:05 -06'00'

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Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency, Region 5

**Consent Agreement and Final Order**

**In the Matter of: Research Organics LLC Docket No. CAA-05-2021-0006**

**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.

**ANN COYLE** Digitally signed by ANN  
COYLE  
Date: 2021.01.19  
14:47:30 -06'00'

\_\_\_\_\_  
Date

\_\_\_\_\_  
Ann L. Coyle  
Regional Judicial Officer  
U.S. Environmental Protection Agency  
Region 5

Consent Agreement and Final Order  
In the matter of: Research Organics LLC  
Docket Number: **CAA-05-2021-0006**

**CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, docket number CAA-05-2021-0006, which was filed on January 21, 2021, in the following manner to the following addresses:

Copy by E-mail to  
Attorney for Respondent: Dale A. Guariglia, Partner,  
Bryan Cave Leighton Paisner LLP  
[dale.guariglia@bclplaw.com](mailto:dale.guariglia@bclplaw.com)

Copy by E-mail to  
Attorney for Complainant: Marcy Toney  
[tony.marcy@epa.gov](mailto:tony.marcy@epa.gov)

Copy by E-mail to  
Regional Judicial Officer: Ann Coyle  
[coyle.ann@epa.gov](mailto:coyle.ann@epa.gov)

Copy by E-mail to  
Vice President for Respondent: Eric Tackett  
[eric.tackett@milliporesigma.com](mailto:eric.tackett@milliporesigma.com)

Copy by E-mail to  
Respondent: Michael Shuler  
[michael.shuler@milliporesigma.com](mailto:michael.shuler@milliporesigma.com)

Copy by E-mail to  
Respondent: Brad Zelch  
[brad.zelch@milliporesigma.com](mailto:brad.zelch@milliporesigma.com)

Copy by E-mail to  
Respondent: Leigh Davidson  
[leigh.davidson@milliporesigma.com](mailto:leigh.davidson@milliporesigma.com)

Dated: \_\_\_\_\_

LADAWN WHITEHEAD Digitally signed by LADAWN WHITEHEAD  
Date: 2021.01.21 12:47:16 -06'00'

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