



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590
June 5, 2013

REPLY TO THE ATTENTION OF:

LC-8J

CERTIFIED MAIL

Receipt No. 7009 1680 0000 7676 8504

Mr. Michael Lonnee
Lonnee Enterprises
1418 Rood Point Road
Muskegon, Michigan 49441

Consent Agreement and Final Order in the Matter of
Lonnee Enterprises, Docket No. TSCA-05-2013-0011

Dear Mr. Lonnee:

I have enclosed a copy of an original fully executed Consent Agreement and Final Order in resolution of the above case. This document was filed on June 5, 2013 with the Regional Hearing Clerk.

The civil penalty in the amount of \$500 is to be paid in the manner described in paragraphs 63 and 64. Please be certain that the docket number is written on both the transmittal letter and on the check. Payment is due by June 5, 2013 (within 30 calendar days of the filing date).

Thank you for your cooperation in resolving this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela Grace".

Pamela Grace
Pesticides and Toxic Compliance Section

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:

Lonnee Enterprises
Muskegon, Michigan

Respondent



JUN 05 2013

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

Docket No. TSCA-05-2013-0011

Proceeding to Assess a Civil
Penalty Under Section 16(a) of the
Toxic Substances Control Act,
15 U.S.C. § 2615(a)

Consent Agreement and Final Order Commencing and Concluding the Proceeding

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 16(a) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2615(a), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/ Termination or Suspension of Permits* (Consolidated Rules) as codified at 40 C.F.R. Part 22.
2. The Complainant is the Director of the Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.
3. Respondent is Lonnee Enterprises, doing business in the State of Michigan.
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. Section 1018 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 (the Lead Act), 42 U.S.C. § 4852d, requires the Administrator of EPA to promulgate regulations for the disclosure of lead-based paint hazards in target housing that is offered for sale or lease.

10. On March 6, 1996, EPA promulgated regulations at 40 C.F.R. Part 745, Subpart F, Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards Upon Sale or Lease of Residential Property (Disclosure Rule) pursuant to 42 U.S.C. § 4852d.

11. 40 C.F.R. § 745.103 defines *target housing* as any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing) or any 0-bedroom dwelling.

12. 40 C.F.R. § 745.103 defines “*lessor*” as any entity that offers target housing for lease, rent, or sublease, including but not limited to individuals, partnerships,

corporations, trusts, government agencies, housing agencies, Indian tribes, and nonprofit organizations.

13. 40 C.F.R. § 745.103 defines “*lessee*” as any entity that enters into an agreement to lease, rent or sublease target housing, including but not limited to individuals, partnerships, corporations, trusts, government agencies, housing agencies, Indian tribes, and nonprofit organizations.

14. 40 C.F.R. § 745.113(b) requires that each contract to lease target housing include, as an attachment or within the contract, a lead warning statement; a statement by the lessor disclosing either the presence of any known lead-based paint and/or lead-based paint hazards in the target housing or lack of knowledge of such presence; a statement by the lessor disclosing the presence of any known lead-based paint and/or lead-based paint hazards in the target housing, or indicating no knowledge of the presence of lead-based paint and/or lead-based paint hazards; a list of any records or reports available to the lessor regarding lead-based paints and/or lead-based paint hazards in the target housing or a statement that no such records exist; a statement by the lessee affirming receipt of the information set out in 40 C.F.R. § 745.113(b)(2) and (3) and the *Lead Hazard Information Pamphlet*; and, the signatures and dates of signature of the lessor and lessee certifying the accuracy of their statements.

15. Under 42 U.S.C. § 4852d(b)(5) and 40 C.F.R. § 745.118(e), failure to comply with the Disclosure Rule violates Section 409 of TSCA, 15 U.S.C. § 2689, which may subject the violator to administrative civil penalties under Section 16(a) of TSCA, 15 U.S.C. § 2615(a), 42 U.S.C. § 4852d(b)(5), and 40 C.F.R. § 745.118(f).

16. The Administrator of EPA may assess a civil penalty of up to \$16,000 for

each violation of Section 409 that occurred after January 12, 2009, pursuant to 42 U.S.C. § 4852d(b)(5), 15 U.S.C. § 2615(a), and 40 C.F.R. Part 19.

17. Section 402(c) of TSCA, 15 U.S.C. § 2682, required the Administrator of EPA to promulgate regulations for conducting renovation and remodeling activities to reduce the risk of exposure to lead in connection with renovation and remodeling of target housing, public buildings built before, and commercial buildings.

18. Section 406(b) of TSCA, 15 U.S.C. § 2686, required the Administrator of EPA to promulgate regulations to require each person who performs for compensation a renovation of target housing to provide a lead hazard information pamphlet to the owner and occupant of such housing prior to commencing the renovation.

19. Section 407 of TSCA, 15 U.S.C. § 2687, required that the regulations promulgated by the Administrator include such recordkeeping and reporting requirements as may be necessary to insure the effective implementation of the TSCA Lead Exposure Reduction requirements, 15 U.S.C. §§ 2681 through 2692.

20. Pursuant to Section 406(b) of TSCA, 15 U.S.C. § 2686, EPA promulgated regulations at 40 C.F.R. Part 745, Subpart E, residential property renovations, requiring, among other things, persons who perform for compensation a renovation of target housing to provide a lead hazard information pamphlet to the owner and occupant prior to commencing the renovation. 63 Fed. Reg. 29908 (June 1, 1998).

21. Pursuant to Section 402(c)(3) of TSCA, 15 U.S.C. § 2682, EPA promulgated regulations amending at 40 C.F.R. Part 745, Subparts E and L, residential property renovations, prescribing procedures and requirements for the accreditation of training programs, certification of individuals and firms, work practice standards for renovation,

repair and painting activities in target housing and child-occupied facilities, titled Lead; Renovation, Repair, and Painting Program; Lead Hazard Information Pamphlet (RRP Rule). 73 Fed. Reg. 21691 (April 22, 2008).

22. Under 40 C.F.R. Part 745, Subpart E, each person who performs for compensation a renovation of target housing or a child-occupied facility must be certified by EPA and by and EPA accredited training provider to conduct renovation and/or painting activities in target housing and/or child occupied facilities and must comply with specific work practice and recordkeeping requirements of the RRP by April 22, 2010. Each person who performs for compensation a renovation of target housing or a child occupied facility must also provide a lead hazard information pamphlet to the owner and occupant of such housing or child occupied facility prior to commencing the renovation and must comply with the PRE Rule by June 1, 1999, codified at 40 C.F.R. § 745.85, and with the amended information distribution requirements of the RRP Rule, recodified at 40 C.F.R. § 745.84, by April 22, 2008.

23. 40 C.F.R. § 745.103 defines *residential dwellings* to mean a single-family dwelling, including attached structures such as porches and stoops; or a single-family dwelling unit in a structure that contains more than one separate residential dwelling unit, and in which each unit is used or occupied, or intended to be used or occupied, in whole or in part, as the residence of one or more persons.

24. 40 C.F.R. § 745.83 defines *child-occupied facility* to mean a building or portion of a building, constructed prior to 1978, visited regularly by the same child, under 6 years of age, on at least two different days within any week (Sunday through Saturday period), provided that each days visit lasts at least 3 hours and the combined weekly visits

last at least 6 hours, and the combined annual visits last at least 60 hours.

25. 40 C.F.R. § 745.223 defines *common area* to mean a portion of a building that is generally accessible to all occupants. Such an area may include, but is not limited to, hallways, stairways, laundry and recreational rooms, playgrounds, community centers, garages, and boundary fences.

26. 40 C.F.R. § 745.83 defines *firm* to mean a company, partnership, corporation, sole proprietorship, or individual doing business, association, or other business entity; a Federal, State, Tribal, or local government agency; or a nonprofit organization.

27. 40 C.F.R. § 745.83 defines *minor repair and maintenance activities* to mean activities, including minor heating, ventilation or air conditioning work, electrical work, and plumbing, that disrupt 6 square feet or less of painted surface per room for interior activities or 20 square feet or less of painted surface for exterior activities where none of the work practices prohibited or restricted by § 745.85(a)(3) are used and where the work does not involve window replacement or demolition of painted surface areas.

28. 40 C.F.R. § 745.83 defines *pamphlet* to mean the EPA pamphlet titled Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools developed under section 406(a) of TSCA for use in complying with Section 406(b) of TSCA, or any State or Tribal pamphlet approved by EPA pursuant to 40 C.F.R. § 745.326 that is developed for the same purpose. This includes reproductions of the pamphlet when copied in full and without revision or deletion of material from the pamphlet (except for the addition or revision of State or local sources of information). Before December 22, 2008, the term “pamphlet” also means any pamphlet developed by

EPA under section 406(a) of TSCA or any State or Tribal pamphlet approved by EPA pursuant to 40 C.F.R. § 745.326.

29. 40 C.F.R. § 745.83 defines *renovation* to mean the modification of any existing structure, or portion thereof, that results in the disturbance of painted surfaces, unless that activity is performed as part of an abatement as defined by this part (40 C.F.R. § 745.223). The term renovation includes (but is not limited to): the removal, modification or repair of painted surfaces or painted components (e.g., modification of painted doors, surface restoration, window repair, surface preparation activity (such as sanding, scraping, or other such activities that may generate paint dust)); the removal of building components (e.g., walls, ceilings, plumbing, windows); weatherization projects (e.g., cutting holes in painted surfaces to install blown-in insulation or to gain access to attics, planning thresholds to install weather stripping), and interim controls that disturb painted surfaces.

30. 40 C.F.R. § 745.83 defines *renovator* to mean an individual who either performs or directs workers who perform renovations. A certified renovator is a renovator who has successfully completed a renovator course accredited by EPA or an EPA-authorized State or Tribal program.

31. 40 C.F.R. § 745.82(b) requires that emergency renovations are not exempt from the cleaning requirements of § 745.85(a)(5), which must be performed by certified renovators or individuals trained in accordance with § 745.90(b)(2), the cleaning verification requirements of § 745.85(b), which must be performed by certified renovators, and the recordkeeping requirements of § 745.86(b)(6) and (b)(7).

32. 40 C.F.R. § 745.84(a)(1) requires that the firm performing renovation in

dwelling units on or after April 22, 2008, must provide the owner or the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certification of mailing at least 7 days prior to the renovation.

33. 40 C.F.R. § 745.84(a)(2) requires that the firm performing renovation in dwelling units on or after April 22, 2008, must provide the occupant of the residential dwelling unit of target housing with the pamphlet and obtain from the occupant, a written acknowledgement that the occupant has received the pamphlet or obtain a certification of mailing at least 7 days prior to the renovation.

34. Prior to the April 22, 2008, recodification, referenced in paragraph 13, above, 40 C.F.R. § 745.85(a)(1) required that the renovator performing renovation in dwelling units from July 1, 1998, till April 22, 2008, must provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation.

35. 40 C.F.R. § 745.81(a)(2)(ii) requires that on or after April 22, 2010, no firm may perform, offer or claim to perform renovations without certification from EPA under 40 C.F.R. § 745.89 in target housing or child occupied facilities, unless the renovation qualifies for one of the exceptions identified in 40 C.F.R. § 745.82(a) or (c).

36. 40 C.F.R. § 745.81(a)(3) requires that on or after April 22, 2010, all renovations must be directed by renovators certified in accordance with § 745.90(a) and performed by certified renovators or individuals trained in accordance with § 745.90(b)(2) in target housing or child-occupied facilities, unless the renovation qualifies

for one of the exceptions identified in 40 C.F.R. § 745.82(a) or (c).

37. 40 C.F.R. § 745.85(a) requires that renovation must be performed by certified firms, in accordance with 40 C.F.R. § 745.89, using certified renovators in accordance with 40 C.F.R. § 745.90.

38. 40 C.F.R. § 745.85(a)(5) requires that after the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains.

39. 40 C.F.R. § 745.86(a) requires that the renovator performing the renovation must retain and, if requested, make available to EPA all records necessary to demonstrate compliance with this subpart for a period of 3 years following completion of the renovation.

40. Under 15 U.S.C. § 2689, failing or refusing to comply with Section 406(b) of TSCA violates Section 409 of TSCA, 15 U.S.C. § 2689, which may subject the violator to administrative civil penalties under Section 16(a) of TSCA, 15 U.S.C. § 2615(a) and 40 C.F.R. § 745.87(d).

41. Section 16(a) of TSCA, 42 U.S.C. § 2615, and 40 C.F.R. § 745.87(d) authorize the EPA Administrator to assess a civil penalty of up to \$25,000 for each violation of Section 409 of TSCA. Each day that such a violation continues constitutes a separate violation of Section 15 of TSCA, 15 U.S.C. § 2614. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, and its implementing regulations at 40 C.F.R. Part 19, increased these statutory maximum penalties to \$27,500 per day of violation that occurred from January 31, 1997, through March 15, 2004, to \$32,500 per day of violation for violations that occurred from March 16, 2004, through January 12, 2009, and to \$37,500 for violations that occurred after January 12, 2009.

Factual Allegations and Alleged Violations

42. Between March 1, 2011 and March 31, 2012, Respondent owned a single family dwelling at 2862 Westland Road, Roosevelt Park, Michigan (Respondent's property).

43. Respondent's property is "target housing" as defined in 40 C.F.R. § 745.103.

44. On the following date, Respondent directly entered into the following lease agreement (contract) with an individual for the lease of Respondent's property:

Address	Date of Lease (Contract)
2862 Westland Road, Roosevelt Park, Michigan	March 1, 2011

45. The contract referred to in paragraph 19, above, covered a term of occupancy greater than 100 days.

46. Respondent is a "lessor," as defined in 40 C.F.R. § 745.103, because it offered the target housing referred to in paragraph 19, above, for lease.

47. The individual who signed a lease to pay rent in exchange for occupancy of the target housing referred to in paragraph 19, above, became a "lessee" as defined in 40 C.F.R. § 745.103.

48. Respondent failed to include a lead warning statement, either within the contract or as an attachment to the contract for the lease of Respondent's property at 2862 Westland Road, Roosevelt Park, Michigan, in violation of 40 C.F.R. § 745.113(b)(1), 15 U.S.C. § 2689, and 42 U.S.C. § 4852d(b)(5).

49. Respondent failed to include a statement disclosing either the presence of any known lead-based paint and/or lead-based paint hazards in the target housing or a lack of knowledge of such presence, either within the contract or as an attachment to the contract for the lease of Respondent's property at 2862 Westland Road, Roosevelt Park,

Michigan, in violation of 40 C.F.R. § 745.113(b)(2), 15 U.S.C. § 2689, and 42 U.S.C. § 4852d(b)(5).

50. Respondent failed to include a list of any records or reports available to the lessor regarding lead-based paint and/or lead-based paint hazards in the target housing that have been provided to the lessee or a statement that no such records are available, either within the contract or as an attachment to the contract for the lease of Respondent's property at 2862 Westland Road, Roosevelt Park, Michigan, in violation of 40 C.F.R. § 745.113(b)(3), 15 U.S.C. § 2689, and 42 U.S.C. § 4852d(b)(5).

51. Respondent failed to include a statement by the lessee affirming receipt of the information set out in 40 C.F.R. § 745.113(b)(2) and (3) and the *Lead Hazard Information Pamphlet* required under 15 U.S.C. § 2696, either within the contract or as an attachment to the contract for the lease of Respondent's property at 2862 Westland Road, Roosevelt Park, Michigan, in violation of 40 C.F.R. § 745.113(b)(4), 15 U.S.C. § 2689, and 42 U.S.C. § 4852d(b)(5).

52. Respondent failed to include the signatures of the lessor, and the lessee certifying to the accuracy of their statements and the dates of such signatures, either within the contract or as an attachment to the contract for the lease of Respondent's property at 2862 Westland Road, Roosevelt Park, Michigan, in violation of 40 C.F.R. § 745.113(b)(6), 15 U.S.C. § 2689, and 42 U.S.C. § 4852d(b)(5).

53. Between May 24, 2010 and June 11, 2010, Respondent power washed, scraped, primed and painted the exterior of the Property located at 2999 Dawes Road, Roosevelt Park, Michigan.

54. On April 20, 2011, EPA issued a subpoena to Respondent investigating

whether Respondent had complied with the RRP Rule at Properties he owned and/or managed.

55. On April 25, 2011, Respondent received the subpoena referenced in paragraph 54, above.

56. Respondent replied to the subpoena on July 7, 2011.

57. The power washing, scraping, priming and painting of the exterior surface conducted at the address referenced in paragraph 53, above, is a renovation as defined in 40 C.F.R. § 745.103.

58. Respondent is a renovator as defined in 40 C.F.R. § 745.103, since he conducted the work described in paragraphs 53 and 57, above.

59. Respondent failed to cover the ground with plastic sheeting or other disposable impermeable material extending 10 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to collect falling paint debris, before the renovation described in paragraph 53, above, was conducted at the Property, as required by 40 C.F.R. § 745.85(a)(2)(ii)(C), as promulgated under 15 U.S.C. § 2682.

60. Respondent failed to clean the work area until no dust, debris or residue remained after the renovation referred to in paragraph 53, above, was conducted at the Property, as required by 40 C.F.R. § 745.85(a)(5)(i), as promulgated under 15 U.S.C. § 2682.

61. Respondent failed to retain and make available records necessary to demonstrate compliance with 40 C.F.R. Part 745, Subpart E for a period of 3 years following completion of the renovation described in paragraph 53, above, was conducted at the Property, including failure to make available records documenting receipt of a

pamphlet, as required by 40 C.F.R. § 745.84(a)(1), and documentation of compliance with the work practice standards requirements of 40 C.F.R. § 745.85, as required by 40 C.F.R. § 745.86(b)(7).

Civil Penalty

62. Pursuant to Section 16(a) of TSCA, 15 U.S.C. § 2615(a), Complainant determined that an appropriate civil penalty to settle this action is \$500. In determining the penalty amount, Complainant considered the nature, circumstances, extent, and gravity of the violations, and, with respect to Respondent, ability to pay, the effect on ability to continue to do business, any history of such prior violations, and the degree of culpability. Complainant considered EPA's *Section 1018 – Disclosure Rule Enforcement Response and Penalty Policy*, dated December 2007. Complainant also considered EPA's *Consolidated Enforcement Response and Penalty Policy for the Pre-Renovation Education Rule; Renovation, Repair and Painting Rule; and Lead-Based Paint Activities Rule*, Interim Final Policy, dated August 2010. In analyzing financial information submitted by the Respondent, Complainant found that the Respondent had an ability to pay a \$500 penalty.

63. Within 30 days after the effective date of this CAFO, Respondent must pay a \$500 civil penalty for the TSCA violations by sending a certified or cashier's check, payable to "Treasurer, United States of America," to:

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

64. A transmittal letter stating Respondent's name, the case title, Respondent's

complete address, the case docket number and the billing document number must accompany the payment. Respondent must also send a copy of the check and transmittal letter to:

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

Pamela Grace (LC-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Nicole Cantello (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

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

66. If Respondent does not pay timely the civil penalty, EPA may refer this matter to the Attorney General who will recover such amount, plus interest, in the appropriate district court of the United States under Section 16(a) of TSCA, 15 U.S.C. § 2615(a). The validity, amount, and appropriateness of the civil penalty are not reviewable in a collection action.

67. 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 the payment was due at a rate established pursuant to 31 U.S.C. § 3717. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

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

69. 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.

70. This CAFO does not affect Respondent's responsibility to comply with the Lead Act and the Disclosure Rule and other applicable federal, state, and local laws.

71. Respondent certifies that he is complying with the Lead Act and the Disclosure Rule.

72. The terms of this CAFO bind Respondent, and his successors and assigns.

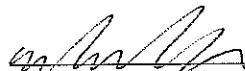
73. Each person signing this agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

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

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

Michael J. Lonnee, Respondent


3-20-13
Date



Michael J. Lonnee

United States Environmental Protection Agency, Complainant

May 29, 2013
Date



Margaret M. Guerriero
Director
Land and Chemicals Division

In the Matter of:

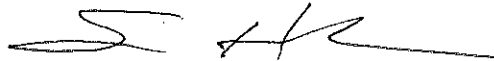
**Lonnee Enterprises, Inc.
Muskegon, Michigan
Docket No. TSCA-05-2013-0011**

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.

6-3-13

Date



Susan Hedman
Regional Administrator
United States Environmental Protection Agency
Region 5



JUN 05 2013

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

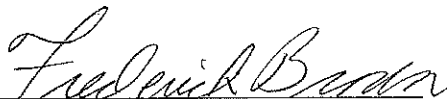
CERTIFICATE OF SERVICE

This is to certify that the original and one copy of this Consent Agreement and Final Order in the resolution of the civil administrative action involving Lonnee Enterprises, was filed on June 6, 2013, with the Regional Hearing Clerk (E-19J), U.S. EPA, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604, and that a true correct copy was sent by Certified Mail, Receipt No. 7009 1680 0000 7676 8504 to:

Mr. Michael Lonnee
Lonnee Enterprises
1418 Rood Point Road
Muskegon, Michigan 49441

and forwarded intra-Agency copies to:

Ann Coyle, Regional Judicial Officer, ORC/C-14J
Nicole Cantello, Counsel for Complainant/C-14J
Eric Volek, Cincinnati Finance/MWD



Frederick Brown, PTCS (LC-8J)
U.S. EPA - Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Docket No. TSCA-05-2013-0011

RECEIVED

JUN 05 2013

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

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