



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

DEC 18 2018

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

Joseph L. Pellis II, Esq.  
Pellis Law Group, LLP  
901 Warrenville Road, Suite 205  
Lisle, IL 60532

SUBJ: E. Luke Green Company, Inc.  
Amendment to Consent Agreement and Final Order  
Docket No. TSCA-04-2018-2906(b)

Dear Mr. Pellis:

Enclosed please find a copy of the executed Amendment to Consent Agreement and Final Order (CAFO) as filed with the Regional Hearing Clerk (RHC) in the above-referenced matter. The Amendment to the CAFO is effective on the date it is filed with the RHC.

Should you have any questions about this matter please contact Robert Caplan at (404) 562-9520.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry L. Lamberth".

Larry L. Lamberth  
Chief, Enforcement and Compliance Branch  
Resource Conservation and Restoration Division

Enclosure

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
ATLANTA, GEORGIA**

In the Matter of: )  
)  
E. Luke Greene Company, Inc. )  
1090 McBride Lane )  
Knoxville, Tennessee 37923 )  
)  
)  
Respondent. )  
\_\_\_\_\_ )

Docket No. TSCA-04-2018-2906(b)

2018 DEC 18 21 51 19

**AMENDMENT TO CONSENT AGREEMENT AND FINAL ORDER**

On August 30, 2018, the EPA Region 4 Regional Judicial Officer ratified the Consent Agreement and Final Order (CAFO) between the United States Environmental Protection Agency and E. Luke Greene Company, Inc. The CAFO was finalized and became effective on September 4, 2018, pursuant to 40 C.F.R. § 22.31, when it was entered by the Regional Hearing Clerk. Subsequent to the effective date of the CAFO, the parties determined that the CAFO included a factual inaccuracy found in the first sentence of paragraph 9 of the CAFO, and the parties have agreed to correct this inaccuracy through the filing of this Amendment to the CAFO.

The first sentence of paragraph 9 in the CAFO stated, "Analytical results of sampling of the transformer fluid conducted by a consultant for the TN DGS showed that the transformer contained 1,390,000 mg/kg (parts per million) PCBs." This Amendment serves to strike the first sentence of paragraph 9 of the CAFO and to replace it with the following: "Analytical results of sampling of the transformer fluid conducted by a consultant for Respondent showed that the transformer contained 1,390,000 mg/kg (parts per million) PCBs."

All remaining provisions of the CAFO remain in full force and effect.

This Amendment shall become effective on the date it is filed by the Regional Hearing Clerk.

**AGREED AND CONSENTED TO:**

**Docket No.:** TSCA-04-2018-2906(b)  
**Amendment to Consent Agreement and Final Order**

**For Respondent:** E. Luke Greene Company, Inc.

By: Josephine S. Greene (Signature) Date: Nov. 15, 2018  
Name: Josephine S. Greene (Typed or Printed)  
Title: President (Typed or Printed)

**For Complainant: U.S. Environmental Protection Agency**

By: Susan E. Hansen Date: 12/6/18  
Susan E. Hansen  
Acting Director  
Resource Conservation and Restoration Division  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

**APPROVED AND SO ORDERED** this 17<sup>th</sup> day of December, 2018.

By: Tanya Floyd  
Tanya Floyd  
Regional Judicial Officer  
EPA Region 4

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the original and a true and correct copy of the foregoing Consent Agreement and the attached Final Order (CAFO) Amendment, for E. Luke Greene Company, Inc., Docket Number: TSCA-04-2018-2906(b), on 12-18-18 and on 12-18-18, served the parties listed below in the manner indicated:

Robert Caplan  
Senior Attorney  
Office of Environmental Accountability  
U.S. EPA, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8909

(Via EPA Internal Mail)

Kris Lippert  
Enforcement and Compliance Branch  
Resource Conservation and Restoration Division  
U.S. EPA, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960

(Via EPA Internal mail)

Quantindra Smith  
Enforcement and Compliance Branch  
Resource Conservation and Restoration Division  
U.S. EPA, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960

(Via EPA Internal mail)

Mr. Jeffrey Jones  
Senior Administrative Officer  
E. Luke Greene Co., Inc.  
4807 Douglas Dam Road  
Strawberry Plains, Tennessee 37871

(Via Certified Mail – Return Receipt Requested)

Date:

12-18-18



Patricia A. Bullock, Regional Hearing Clerk  
United States Environmental Protection Agency, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303  
(404) 562-9511