



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

AUG 17 2017

REPLY TO THE ATTENTION OF:

VIA EMAIL

Mr. Frederick J. Dindoffer
Bodman, PLC
1901 St. Antoine Street, 6th Floor
Detroit, Michigan 48226

Re: Consent Agreement and Final Order
Samvardhana Motherson Reflectec Automotive Systems USA, Inc.
Docket No: RCRA-05-2017-0022

Dear Mr. Dindoffer:

Enclosed please find an original signed fully-executed Consent Agreement and Final Order (CAFO) in resolution of the above case. The originals were filed with the Regional Hearing Clerk on August 17, 2017.

Please instruct your client to pay the civil penalty in the amount of \$197,000 in the manner prescribed in paragraph 67 of the CAFO, and reference all checks with the docket number RCRA-05-2017-0022. The payment is due within 30 calendar days of the effective date of the CAFO. 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 "Gary J. Victorine".

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Jack Schinderle, MDEQ (schinderlej@michigan.gov)
Carrie Hardigan, MDEQ (hardiganc@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)

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:)	Docket No.:	RCRA-05-2017-0022
)		
SAMVARDHANA MOTHERSON)	Proceeding to Commence and Conclude	
REFLECTEC AUTOMOTIVE)	an Action to Assess a Civil Penalty	
SYSTEMS USA, INC.)	Under Section 3008(a) of the Resource	
)	Conservation and Recovery	
Act, MARYSVILLE, MICHIGAN,)	42 U.S.C. § 6928(a)	
)		
U.S. EPA ID No.: MIK527952725)		
)		
RESPONDENT.)		



CONSENT AGREEMENT AND FINAL
ORDER

Preliminary
Statement

1. This is an administrative action commenced and concluded under section 3008(a) of the Solid Waste Disposal Act, also known as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), and sections 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 Land and Chemicals Division, United States Environmental Protection Agency (U.S. EPA), Region 5.
3. Respondent is Samvardhana Motherson Reflectec Automotive Systems USA, Inc., a corporation doing business in the State of Michigan.
4. According to 40 C.F.R. § 22.13(b), where the parties agree to settle one or more causes of action before the filing of a complaint, an administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO).

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 terms of this CAFO, including the assessment of the civil penalty specified below.

7. U.S. EPA provided notice of commencement of this action to the State of Michigan pursuant to section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

Jurisdiction and Waiver of Right to Hearing

8. Jurisdiction for this action is conferred upon U.S. EPA by sections 3006(b) and 3008 of RCRA, 42 U.S.C. §§ 6926(b), and 6928.

9. Respondent admits the jurisdictional allegations set forth in this document and neither admits nor denies the factual allegations in this CAFO.

10. 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

11. 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 or used oil, pursuant to, among others, sections 3001 – 3007, 3013 and 3014 of RCRA, 42 U.S.C. §§ 6921 – 6927, 6934 and 6935.

12. 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. §§ 6921-6939e) or any state provision authorized pursuant to section 3006 of RCRA

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.

13. Pursuant to section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Administrator of U.S. EPA granted the State of Michigan final authorization to administer a state hazardous waste program in lieu of the federal government's base RCRA program effective October 30, 1986. Notice of this authorization was published at 51 Fed. Reg. 36804 (October 16, 1986).

14. Under section 3008(a) of RCRA, 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified period of time, or both. 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 note (1996), 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 \$37,500 per day for each violation of subtitle C of RCRA that occurred after January 12, 2009.

Factual Allegations and Alleged Violations

15. Respondent was and is a "person" as defined by MAC 299.9106(i), 40 C.F.R. § 260.10, and section 1004(15) of RCRA, 42 U.S.C. § 6903(15).

16. Respondent is the "owner" or "operator," as those terms are defined under MAC R 299.9106(f) and (g), and 40 C.F.R. § 260.10, of a facility located at 1875 Busha Highway, Marysville, Michigan (facility).

17. The facility consists of land and structures, other appurtenances, and improvements on the land used for treating, storing, or disposing of hazardous waste.

18. Respondent's facility is a "facility," as that term is defined in MAC R. 299.9103(r) [40 C.F.R. § 260.10]¹.

19. Respondent's facility specializes in molding, painting and fabrication of automotive side door mirrors.

20. On July 7, 2015, U.S. EPA conducted an inspection of Respondent's facility.

21. At all times relevant to this CAFO, Respondent's processes at the facility produced several hazardous wastes identified or listed in MAC R. 299.9201-9230 [40 C.F.R. parts 260-270], including but not limited to D001, D007, D008, F003 and F005 hazardous wastes.

22. Respondent is a "generator," as that term is defined in MAC R. 299.9104(a) [40 C.F.R. § 260.10].

23. Respondent produced more than 1,000 kilograms (2,205 pounds) of hazardous waste each calendar month of 2012, 2013, 2014 and 2015 prior to the inspection, and was a large quantity generator.

24. Respondent is subject to the regulations promulgated pursuant to subtitle C of RCRA, 42 U.S.C. §§ 6921 - 6939e, or the analogous Michigan regulations as part of the applicable state hazardous waste management program for the state of Michigan, or both.

25. At no time relevant to this CAFO had the State of Michigan issued a license to Respondent to treat, store, or dispose of hazardous waste at the facility.

¹ For the purposes of this document and for convenient reference, federal corollaries to enforceable Michigan hazardous waste program requirements are provided in brackets.

26. At no time relevant to this CAFO did Respondent have interim status for the treatment, storage, or disposal of hazardous waste at the facility.

**Count I: Unauthorized Storage of Hazardous Wastes and
Failure to Label Hazardous Waste**

27. Complainant incorporates paragraphs 1 through 26 of this CAFO as though set forth in this paragraph.

28. Pursuant to 3005(a) or RCRA, 42 U.S.C. § 6925(a), and the regulations at 40 C.F.R. part 270, the treatment, storage, or disposal of hazardous waste by any person who has not applied for or received a license is prohibited.

29. According to MAC R. 299.9306 [40 C.F.R. § 262.34], a generator may accumulate hazardous waste for up to 90 days without obtaining a hazardous waste storage license if it satisfies the conditions of the exemption contained in that rule.

30. If the conditions of MAC R. 299.9306 are not met, then the generator must apply for an operating license under MAC R. 299.9502, 299.9508, 299.9510 [40 C.F.R. part 264, 40 C.F.R. §§ 270.1(c), 270.10(a) and (d), and 270.13].

31. According to MAC R. 299.9306(2), to maintain an exemption from the requirement to have an operating license or interim status, a generator of hazardous waste must label each container of hazardous waste accumulated on site with the words "Hazardous Waste" and mark each container with the regulatory waste numbers or codes applicable to the waste.

32. At all times relevant to this CAFO, Respondent stored containers of hazardous waste on site.

33. On July 7, 2015, three of Respondent's containers of hazardous waste were not correctly marked: One was not labeled. Two were labeled as Hazardous Waste, but they were

not marked with the regulatory waste numbers or codes applicable to the waste contained therein.

34. Respondent's failure to properly label and mark each container holding hazardous waste subjects Respondent to the license requirements of MAC R. 299.9502, 299.9508, 299.9510 [40 C.F.R. §§ 270.1(c) and 270.10(a), (d), and 270.13].

35. Respondent's failure to meet the applicable conditions for the generator exemption provided by MAC R. 299.9306 [40 C.F.R. § 262.34], Respondent became an operator of a hazardous waste treatment, storage and disposal facility.

36. Respondent's storage of hazardous waste without a license or interim status violated section 3005(a) of RCRA, 42 U.S.C. § 6925(a).

Count II: Failure to Provide Hazardous Waste Training and Maintain Records

37. Complainant incorporates paragraphs 1 through 36 of this CAFO as though set forth in this paragraph.

38. To maintain its exemption from the requirement to have an operating license or interim status, a generator of hazardous waste must comply with MAC R. 299.9306(1)(d), which requires compliance with the employee training and recordkeeping requirements of 40 C.F.R. § 265.16.

39. Federal regulations, at 40 C.F.R. § 265.16, require a generator of hazardous waste to provide facility personnel a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with RCRA. The rule also requires that the owner or operator of a facility must maintain certain records regarding training of facility personnel for designated periods of time.

40. On July 7, 2015, Respondent could not produce records for years 2012-2015 of training of facility personnel to perform their duties in a way that ensures the facility's compliance with RCRA.

41. Respondent consequently failed to comply with the training and recordkeeping requirements of 40 C.F.R. § 265.16.

Count III: Incomplete Facility Contingency Plan

42. Complainant incorporates paragraphs 1 through 41 of this CAFO as though set forth in this paragraph.

43. To maintain its exemption from the requirement to have an operating license or interim status, a generator of hazardous waste must comply with MAC R. 299.9306(1)(d), which, requires compliance with subpart D of 40 C.F.R. part 265.

44. Federal regulations, at 40 C.F.R. § 265.52, require an owner or operator of a facility to prepare a contingency plan for the facility in the event of an emergency. The regulations, at 40 C.F.R. § 265.52, further specify the contents of that contingency plan.

45. On July 7, 2015, Respondent's facility contingency plan prepared under 40 C.F.R. § 265.52 did not contain necessary emergency response procedure information, such as contact information for designated emergency coordinators, a description or map of emergency evacuation routes or the location and description of emergency equipment on site. This information is required under 40 C.F.R. § 265.52(d)-(f).

46. Respondent consequently failed to comply with the requirements for the contents of an emergency hazardous waste contingency plan as laid out at 40 C.F.R. § 265.52.

Count IV: Failure to Conduct Monthly Leak Detection

47. Complainant incorporates paragraphs 1 through 46 of this CAFO as though set forth in this paragraphs.

48. To maintain its exemption from the requirement to have an operating license or interim status, a generator of hazardous waste must comply with MAC R. 299.9306(1)(a)(i), which in turn requires compliance with subpart BB of 40 C.F.R. part 265.

49. Federal regulations, at 40 C.F.R. § 265.1052(a)(1) and 265.1057(a), require that each pump and each valve in hazardous waste light liquid service must be monitored monthly to detect leaks by methods specified in the rule.

50. At all times relevant to this CAFO, Respondent operated hazardous waste equipment to which the regulations of subpart BB apply.

51. At all times relevant to this CAFO, Respondent operated pumps and valves in hazardous waste light liquid service to which the provisions of subpart BB of 40 C.F.R. part 265 apply.

52. Prior to July 7, 2015, Respondent had not performed monthly monitoring of pumps and valves that were in hazardous waste light liquid service.

53. Respondent consequently failed to comply with the requirements for the monthly leak detection monitoring of its pumps and valves in light liquid service per the requirements of subpart BB of 40 C.F.R. part 265, as required by 40 C.F.R. §§ 265.1052(a)(1) and 265.1057(a).

Count V: Failure to Maintain Records

54. Complainant incorporates paragraphs 1 through 53 of this CAFO as though set forth in this paragraph.

55. To maintain its exemption from the requirement to have an operating license or interim status, a generator of hazardous waste must comply with MAC R. 299.9306(1)(a)(i), which in turn requires compliance with subpart BB of 40 C.F.R. part 265.

56. Federal regulations, at 40 C.F.R. § 265.1064(b)(1), (g), require the owner or operator of equipment subject to subpart BB of 40 C.F.R. part 265 to prepare and maintain specific information on the operation of that equipment in operating logs and other records. This information includes equipment identification numbers, location, equipment type, organics content of waste managed by the equipment, the method selected for RCRA compliance for that piece of equipment and equipment identification numbers for equipment designated as having no detectable emissions.

57. At all times relevant to this CAFO, Respondent operated hazardous waste equipment to which the regulations of subpart BB of 40 C.F.R. part 265 apply.

58. On July 7, 2015, Respondent could not produce the operating logs and other records containing the information required by 40 C.F.R. § 265.1064(b)(1) and (g).

59. Respondent consequently failed to comply with the requirements to prepare and maintain the operating logs and records for its equipment subject to subpart BB of 40 C.F.R. part 265 as required by 40 C.F.R. § 265.1064(b)(1) and (g).

Count VI: Failure to Use Proper Control Measures

60. Complainant incorporates paragraphs 1 through 59 of this CAFO as though set forth in this paragraph.

61. To maintain its exemption from the requirement to have an operating license or interim status, a generator of hazardous waste must comply with MAC R. 299.9306(1)(a)(i), which in turn requires compliance with subpart CC of 40 C.F.R. part 265.

62. Federal regulations, at 40 C.F.R. § 265.1087(b), require that owners and operators of hazardous waste containers subject to subpart CC that are employed in light material service control air pollutant emissions from those containers according to the Container Level 2

standards specified at 40 C.F.R. § 265.1087(d). These requirements include demonstrating the containers gave off no detectable emissions when closed or were otherwise vapor-tight, or that procedures to add or remove hazardous wastes from a subject container in a way to minimize exposure of the waste to the atmosphere.

63. On July 7, 2015, Respondent operated equipment subject to subpart CC in light material service that required Container Level 2 controls.

64. On July 7, 2015, Respondent could not demonstrate its containers in light material service subject to subpart CC gave off no detectable emissions when closed or were otherwise vapor-tight, or that procedures to add or remove hazardous wastes from a subject container would minimize exposure of the waste to the atmosphere.

65. Respondent consequently failed to comply with the requirements of 40 C.F.R. § 265.1087(b), requiring the owner or operator of equipment subject to subpart CC of 40 C.F.R. part 265 that are employed in light material service to control air pollutant emissions from those containers according to the Container Level 2 standards specified at 40 C.F.R. § 265.1087(d).

Civil Penalty

66. Pursuant to section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), Complainant determined that an appropriate civil penalty to settle the RCRA counts of this action is \$197,000. In determining the penalty amount, Complainant took into account the seriousness of the violation, any good faith efforts to comply with the applicable requirements, and the nature, circumstances, extent and gravity of the violations. Complainant also considered Respondent's cooperation in settling this matter and U.S. EPA's RCRA Civil Penalty Policy, dated June 23,

2003.

67. Within 30 days after the effective date of this CAFO, Respondent must pay \$197,000 as a civil penalty for the RCRA violations. Respondent must pay the penalty by sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

The check must note the following: In re: Samvardhana Motherson Reflectec Automotive Systems USA, Inc., and the docket number of this CAFO.

68. A transmittal letter, stating Respondent's name, the case name, Respondent's complete address and the case docket numbers, must accompany the payment. Respondent must send a copy of the checks and transmittal letter, by U.S. mail or email, to:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3511

Brian Kennedy (LR-17J)
RCRA Branch
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Robert S. Guenther (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

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

70. If Respondent does not timely pay this civil penalty, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States enforcement expenses for the collection action. Respondent

agrees that the validity, amount and appropriateness of these civil penalty are not reviewable in a collection action.

71. 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 payment was due at a rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). 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

72. Respondent certifies that it is complying fully with applicable requirements of RCRA, 42 U.S.C. §§ 6901 – 6939e, the regulations at 40 C.F.R. §§ 260.1 – 279.82 and the federally-authorized Michigan corollaries to the federal regulations.

73. Consistent with the Standing Order Authorizing E-Mail Service of Orders and Other Documents issued by the Regional Administrator or Regional Judicial Officer under the Consolidated Rules, dated March 27, 2015, the parties consent to service of this filed CAFO by e-mail at the following valid e-mail addresses: guenther.robert@epa.gov (for Complainant) and flindoffer@bodmanlaw.com (for Respondent). The parties waive their right to service by the methods specified in 40 C.F.R. § 22.6.

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

75. This CAFO does not affect the rights of U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

76. This CAFO does not affect Respondent's responsibility to comply with the requirements of RCRA and other applicable federal, state and local laws and regulations.

77. This CAFO is a "final order" for purposes of 40 C.F.R. § 22.31 and U.S. EPA's RCRA Civil Penalty Policy.

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


79. 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.

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

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

Samvardhana Motherson Reflectec Automotive Systems, Inc., Respondent


July 20, 2017
Date



John R. Jesionowski
Treasurer/Secretary
Samvardhana Motherson Reflectec Automotive
Systems USA, Inc.

United States Environmental Protection Agency, Complainant

Aug 11, 2017
Date




Brigid Lowery
Acting Division Director
Land and Chemicals Division
U.S. Environmental Protection Agency
Region 5

**In the Matter of: Samvardhana Motherson Reflectec Automotive Systems USA,
Inc. Docket No. RCRA-05-2017-0022**

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.

8/17/17
Date


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

In the matter of: Samvardhana Motherson Reflectec Automotive Systems USA, Inc.
Docket Number: RCRA-05-2017-0022

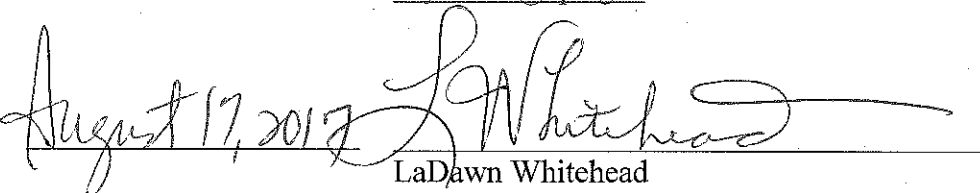
CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, docket number RCRA-05-2017-0022, which was filed on August 17, 2017, this day in the following manner to the addressees:

Copy by e-mail to
Attorney for Respondent: Frederick J. Dindoffer
fdindoffer@bodmanlaw.com

Copy by e-mail to
Attorney for Complainant: Robert S. Guenther
guenther.robert@epa.gov

Copy by e-mail to
Regional Judicial Officer: Ann Coyle
coyle.ann@epa.gov

Dated: August 17, 2017 
LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5

