



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

4APT-PTSB

SEP 24 2009

Certified Mail – Return Receipt Requested

Ms. Jonna Stein  
Safety, Health and Environmental Manager  
Chemical Specialties, Inc.  
5910 Pharr Mill Road  
Harrisburg, North Carolina 28075

SUBJ: Docket No. TSCA-04-2009-2625(b)  
Chemical Specialties, Inc.

Dear Ms. Stein:

Enclosed is a copy of the ratified Consent Agreement and Final Order (CAFO) in the above-referenced matter. The original CAFO has been filed with the Regional Hearing Clerk and served on the parties as directed in Section 22.6 of the Consolidated Rules of Practice, 40 C.F.R. Part 22.

As stated in Paragraph 87 of the CAFO, the assessed penalty of \$33,431 is due within 30 days from the effective date. Please ensure that the face of your cashier's or certified check includes the name of the company and the docket number of this case.

Penalty payment questions should be directed to Ms. Lori Weidner either by telephone at (513) 487-2125 or by written correspondence to her attention at U.S. Environmental Protection Agency (EPA), Cincinnati Accounting Operations address identified in the CAFO. Should you have any questions about this matter or your compliance status in the future, please call me at (404) 562-8979 or Mr. Mark Bean at (404) 562- 9000.

Also enclosed is a copy of a document entitled "Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings." This document puts you on notice of your potential duty to disclose to the Securities and Exchange Commission (SEC) any environmental enforcement actions taken by EPA.

Sincerely,

Jeaneanne M. Gettle  
Chief  
Pesticides and Toxic  
Substances Branch

Enclosures

Internet Address (URL) • <http://www.epa.gov>

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UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
ATLANTA, GEORGIA

2009 SEP 24 AM 7:24  
REMARKS  
EPA REGION IV

In the Matter of: )  
 )  
Chemical Specialties, Inc. ) Docket No. TSCA-04-2009-2625(b)  
 )  
 )  
Respondent. )  
\_\_\_\_\_ )

**CONSENT AGREEMENT AND FINAL ORDER**

**I. Nature of the Action**

1. This is a civil penalty proceeding pursuant to Section 16(a) of the Toxic Substances Control Act, 15 U.S.C. § 2615 (a), and pursuant to the Consolidated Rules of Practice Governing Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), 40 C.F.R. Part 22. Complainant is the Director of the Air, Pesticides, and Toxics Management Division, United States Environmental Protection Agency, Region 4 (EPA). Respondent is Chemical Specialties, Inc.
2. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order (CAFO) will simultaneously commence and conclude this matter.

Chemical Specialties, Inc.  
EPA Docket Number TSCA-04-2009-2625(b)

## **II. Preliminary Statements**

3. Pursuant to Section 15 of TSCA, 15 U.S.C. § 2614, it is unlawful for any person to:  
fail or refuse to comply with any rule or order promulgated pursuant to Sections 4, 5, 8, 12 or 13 of TSCA (15 U.S.C. § 2603, § 2604, § 2607, § 2611 or § 2612); (2) use for commercial purposes a chemical substance or mixture that the person knew or had reason to know was manufactured, imported, processed, or distributed in commerce in violation of TSCA Section 5, 15 U.S.C. § 2604; (3) fail to maintain records, submit reports or information, or permit access to or allow copying of records as required by TSCA; and (4) refuse to permit entry or inspection as authorized by Section 11 of TSCA, 15 U.S.C. § 2610. Any person who violates a provision of Section 15 of TSCA may be assessed a penalty of up to \$27,500 for each such violation, in accordance with Section 16(a) of TSCA and 40 C.F.R. Part 19, as amended. For a violation occurring after March 15, 2004, a penalty of up to \$32,500 may be assessed. Each day a violation continues may constitute a separate violation.
4. The authority to take action under Section 16(a) of TSCA, 15 U.S.C. § 2615(a), is vested in the Administrator of EPA. The Administrator of EPA has delegated this authority under TSCA to EPA Region 4 by EPA Delegation 12-2-A, dated May 11, 1994.
5. Complainant will file the original non-confidential CAFO with the Regional Hearing Clerk and a copy will be mailed to the Respondent.
6. Pursuant to 40 C.F.R. § 22.5(c)(4) the following individual represents EPA in this matter and is authorized to receive service for EPA in this proceeding:

Mark Bean  
Chemical Products and  
Asbestos Section  
U.S. EPA Region 4  
61 Forsyth Street  
Atlanta, Georgia 30303-8960  
(404) 562-9000.

### **III. Specific Allegations**

7. Respondent is a chemical manufacturer that imports raw materials and manufactures chemical products.
8. Respondent owns and operates a chemical import and manufacturing facility located at 5910 Pharr Mill Road, Harrisburg, North Carolina 28075.
9. Respondent is a person as that term is defined in 40 C.F.R. § 710.33.
10. Respondent is a manufacturer as that term is defined in 40 C.F.R. § 704.3.
11. Pursuant to Section 8(a) of TSCA, 15 U.S.C. § 2607(a), each person who manufactures or processes or proposes to manufacture or process a chemical substance shall maintain such records, and shall submit such reports, as the Administrator may reasonably require.
12. Any person who manufactured (including imported) for commercial purposes 25,000 pounds or more of a chemical substance listed on the Master Inventory File, as that term is defined under 40 CFR § 710.43, is subject to the recurring reporting requirement set forth in 40 C.F.R. § 710.48.
13. The dates for inventory update reporting for 2006 and beyond are set forth in 40 C.F.R. § 710.52.
14. A reportable chemical substance is defined in 40 C.F.R. § 710.43. as a chemical substance listed on the Master Inventory File.

15. Pursuant to 40 C.F.R. § 710.52, the reporting year applicable to the matters addressed in this CAFO was calendar year 2005.
16. Pursuant to 40 C.F.R. § 710.43, the submission period is defined as the period in which information generated during the reporting year is submitted to EPA.
17. Pursuant to 40 C.F.R. § 710.53, the submission period applicable to this matter was between the dates of August 25, 2006, and March 23, 2007, inclusive.
18. According to three Notices of Arrival of Pesticides and Devices, EPA Form 3540-1 (Rev. 2-00), submitted to EPA by Respondent, entry dates January 31, 2005, February 6, 2005, and February 25, 2005, respectively, and each bearing the declaration, "NOT FOR PESTICIDAL USE," Respondent imported in excess of 25,000 pounds of arsenic trioxide during calendar year 2005.
19. Respondent is a person subject to recurring reporting as set forth in 40 C.F.R. §710.48.
20. Pursuant to 40 C.F.R. § 710.59, each person who submits written information in response to the requirements set forth in Section 8(a) of TSCA, 15 U.S.C. §2607(a) and 40 C.F.R. 710, Subpart C, must use EPA Form U.
21. On November 10, 2008, Respondent submitted to EPA a completed Form U (2006) Partial Updating of Inventory Data Base Site Report for calendar year 2005, for the facility named in paragraph 8, above.
22. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it imported in excess of 25,000 pounds of arsenic trioxide in 2005.
23. Arsenic trioxide was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.

24. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of arsenic trioxide during the applicable submission period.
25. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it imported in excess of 25,000 pounds of boric acid in 2005.
26. Boric acid was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
27. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of boric acid during the applicable submission period.
28. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it imported in excess of 25,000 pounds of manganese carbonate in 2005.
29. Manganese carbonate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
30. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of manganese carbonate during the applicable submission period.
31. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured and imported in excess of 25,000 pounds of calcium nitrite in 2005.
32. Calcium nitrite was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
33. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of calcium nitrite during the applicable submission period.
34. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it imported in excess of 25,000 pounds of zinc carbonate in 2005.

35. Zinc carbonate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
36. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of zinc carbonate during the applicable submission period.
37. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of aluminum nitrate in 2005.
38. Aluminum nitrate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
39. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of aluminum nitrate during the applicable submission period.
40. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of calcium nitrate in 2005.
41. Calcium nitrate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
42. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of calcium nitrate during the applicable submission period.
43. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of magnesium nitrate in 2005.
44. Magnesium nitrate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
45. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of magnesium nitrate during the applicable submission period.

46. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of magnesium chloride in 2005.
47. Magnesium chloride was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
48. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of magnesium chloride during the applicable submission period.
49. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of ortho arsenic acid in 2005.
50. Ortho arsenic acid was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
51. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of ortho arsenic acid during the applicable submission period.
52. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of diammonium phosphate in 2005.
53. Diammonium phosphate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
54. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of diammonium phosphate during the applicable submission period.
55. Lithium carbonate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
56. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of lithium carbonate during the applicable submission period.



57. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of manganese nitrate in 2005.
58. Manganese nitrate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
59. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of manganese nitrate during the applicable submission period.
60. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of zinc nitrate in 2005.
61. Zinc nitrate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
62. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of zinc nitrate during the applicable submission period.
63. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of sodium nitrate in 2005.
64. Sodium nitrate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.
65. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of sodium nitrate during the applicable submission period.
66. In the Form U submitted by Respondent on November 10, 2008, Respondent reported that it manufactured in excess of 25,000 pounds of zinc acetate in 2005.
67. Zinc acetate was a reportable chemical substance in that it was listed on the Master Inventory File at the beginning of the applicable reporting year.

68. Respondent violated 15 U.S.C § 2614(3)(B) in that it failed to report the manufacture or import of zinc acetate during the applicable submission period.

#### **IV. Consent Agreement**

69. For the purposes of this CAFO, Respondent admits the jurisdictional allegations set forth above and neither admits nor denies the factual allegations.

70. Respondent waives its right to a hearing on the allegations contained herein and its right to appeal the proposed final order accompanying the consent agreement.

71. Respondent consents to the assessment of the penalty proposed by EPA and agrees to pay the civil penalty as set forth in this CAFO.

72. Respondent certifies that as of the date of its execution of this CAFO, it is in compliance with all relevant requirements of TSCA.

73. This CAFO constitutes a settlement by EPA of all claims for civil penalties pursuant to Section 16 of TSCA, for the specific violations alleged herein. Except as specifically provided in this CAFO, EPA reserves all other civil and criminal enforcement authorities, including the authority to address imminent hazards. Compliance with this CAFO shall not be a defense to any other actions subsequently commenced pursuant to Federal laws and regulations administered by EPA, and it is Respondent's responsibility to comply with said laws and regulations.

74. Complainant and Respondent agree to settle this matter by their execution of this CAFO.

The parties agree that the settlement of this matter is in the public interest and that this CAFO is consistent with the applicable requirements of TSCA.

## V. Terms of Settlement

75. Pursuant to 15 U.S.C. § 2615(a), TSCA Section 16(a), the nature of the alleged violation, Respondent's agreement to perform a Supplemental Environmental Project (SEP) and other relevant factors, EPA has determined that an appropriate civil penalty to settle this action is in the amount of **Thirty-Three Thousand, Four Hundred Thirty-One Dollars (\$33,431)**.
76. Respondent consents to the issuance of this CAFO and consents for purposes of settlement to the payment of the civil penalty as cited in the foregoing paragraph and to the performance of the SEP set forth herein.
77. Respondent shall complete the following SEP, which the parties agree is intended to secure significant environmental or public health protection.
- a. Install a new, more efficient air emissions scrubber at the subject facility to reduce current levels of ammonia emissions by up to 32.5 per cent and acetic acid emissions by an additional 68.6 per cent.
  - b. Additionally, Respondent will prevent the landfill disposal of approximately 680,000 pounds of ammonium acetate scrubber waste by enrichment and conversion of the waste stream into a commercially viable feedstock.
  - c. The SEP is more specifically described in the scope of work attached hereto as Exhibit A and incorporated herein by reference.
78. The SEP is to be completed by Respondent within one year of the effective date of this CAFO.
79. The total expenditure for the SEP shall not be less than **Two Hundred Seventy Thousand, Thirty Dollars (\$270,030)**. Respondent shall include documentation of the expenditures made in connection with the SEP as part of the SEP Completion Report set forth herein.

80. Respondent shall submit a SEP Completion Report to EPA within 30 days after the completion of the SEP. The SEP Completion Report shall contain the following information:
- a. a detailed description of the SEP as implemented;
  - b. an affidavit from an authorized company official attesting that the SEP has been completed or explaining in detail any failure to complete;
  - c. copies of the appropriate documentation, including the signed capital expenditure proposal, any revised permits, full accounting of any internal work hours and labor costs applicable to the SEP, and final invoices for supplies and equipment purchases and outside services. The SEP Completion Report shall be sent to:

Mark Bean  
Chemical Products and  
Asbestos Section  
U.S. EPA Region 4  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

81. Respondent agrees that failure to submit the SEP Completion Report required as set herein above shall be deemed a violation of this CAFO and Respondent shall become liable for stipulated penalties pursuant to paragraph 83 below.
82. Respondent agrees that EPA may inspect the facility at any time in order to confirm that the SEP is being undertaken in conformity with the representations made herein.
83. Respondent agrees that failure to comply with any of the terms or provisions of this CAFO relating to the performance of the SEP and/or to the extent that the actual expenditures for the SEP do not equal or exceed the cost of the SEP described in paragraph 77 above, Respondent shall be liable for stipulated penalties according to the provisions set forth below:

- a. Except as provided in subparagraph (b) immediately below, in the event that Respondent fails to timely and fully complete any part of the SEP, including failing to spend the minimum amount of **Two Hundred Seventy Thousand, Thirty Dollars (\$270,030)** for the SEP, Respondent shall pay a stipulated penalty to the United States in the amount of **One Hundred Fifty-Two Thousand, Nine Hundred Six Dollars (\$152,906)**.
- b. If the SEP is not fully and timely completed, but the Complainant determines that Respondent made good faith and timely efforts to complete the SEP and certifies, with supporting documentation, that at least 90 percent of the minimum amount of money which was required to be spent was expended on the SEP, Respondent shall not be liable for any stipulated penalty.
- c. If the SEP is fully and timely completed, and Respondent expended at least 90 percent of the minimum amount of money required to be spent for the SEP, Respondent shall not be liable for any stipulated penalty.
- d. For failure to timely submit a SEP Completion Report required by paragraph 80 above, Respondent shall pay a stipulated penalty in the amount of One Hundred Dollars (\$100) for each day the report is late.
- e. The determination of whether the SEP has been satisfactorily completed and whether the Respondent has made a good faith, timely effort to implement the SEP shall be in the sole discretion of EPA.
- f. Respondent shall pay stipulated penalties not more than fifteen (15) days after receipt of written demand by EPA for such penalties. The method of payment shall be in accordance with the provisions of Section VI below.

84. Respondent certifies that, as of the date this CAFO is signed, Respondent is not required to perform any part of the SEP by any federal, state or local law, regulation, permit or order, or by any agreement or grant. Respondent further certifies that it has not received, and is not negotiating to receive credit for any part of the SEP in any other enforcement action of any kind.
85. For Federal Income Tax purposes, Respondent agrees that it will neither capitalize into inventory or basis nor deduct any costs or expenditures incurred in performing the SEP.
86. Any public statement, oral or written, made by Respondent making reference to the SEP shall include the following language, "This project was undertaken in connection with the settlement of an enforcement action taken by the U.S. Environmental Protection Agency for violations of Section 16(a) of the Toxic Substances Control Act, 15 U.S.C. § 2615(a)."

#### **VI. Final Order**

87. Respondent is assessed a civil penalty of **Thirty-Three Thousand, Four Hundred Thirty-One Dollars (\$33,431)** which shall be paid within 30 days from the effective date of this CAFO.
88. Respondent shall remit the civil penalty by either a cashier's or certified check made payable to the "Treasurer, United States of America," and shall send the check to the following address by U.S. Postal Service:

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

**The check shall reference on its face the name of the Respondent and Docket Number of this CAFO.**

Payment by wire transfer, in lieu of a cashier's or certified check, if desired, should be directed to the Federal Reserve Bank of New York

Federal Reserve Bank of New York  
ABA = 021030004  
Account = 68010727  
SWIFT address = FRNYUS33  
33 Liberty Street  
New York NY 10045  
Field Tag 4200 of the Fedwire message should read " D 68010727  
Environmental Protection Agency "

89. At the time of payment, Respondent shall send a separate copy of the check or wire transfer and a written statement that the payment has been made in accordance with this CAFO, to each of the following persons at the following addresses:

Regional Hearing Clerk  
U.S. EPA Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960;

Mark Bean  
Chemical Products and  
Asbestos Section  
U.S. EPA Region 4  
61 Forsyth Street  
Atlanta, Georgia 30303-8960;

and,

Saundi Wilson  
Office of Environmental Accountability  
U.S. EPA - Region 4  
61 Forsyth Street  
Atlanta, Georgia 30303-8960.

90. For the purposes of state and federal income taxation, Respondent shall not be entitled, and agrees not to attempt, to claim a deduction for any civil penalty payment made pursuant to

this CAFO, if the penalty is not paid by the date required. A charge will also be assessed to cover the administrative costs, both direct and indirect, of overdue debts. In addition, a late payment penalty charge shall be applied on any principal amount not paid within 90 days of the due date.

92. Complainant and Respondent shall bear their own costs and attorney fees in this matter.

93. This CAFO shall be binding upon the Respondent, its successors and assigns.

94. The undersigned representative of the party to this CAFO certifies that he or she is fully authorized by the party represented to enter into this CAFO and legally binds that party to this CAFO.

**The remainder of this page is intentionally blank.**

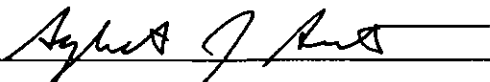


**VII. Effective Date**


95. The effective date of this CAFO shall be the date on which the CAFO is filed with the Regional Hearing Clerk.

**AGREED AND CONSENTED TO:**

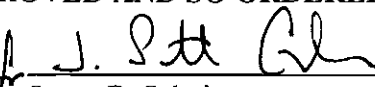
**Respondent:** Chemical Specialties, Inc.  
**Docket No.:** TSCA-04-2009-2625(b)

By:  (Signature) Date: 09/11/09  
Name: Sylvester J. Bartos (Typed or Printed)  
Title: V.P. of Operations (Typed or Printed)

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

By:  Date: SEP 18 2009  
Carol L. Kemker, Acting Director  
Air, Pesticides and Toxics  
Management Division  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

**APPROVED AND SO ORDERED** this 22<sup>nd</sup> day of September, 2009.

By:   
Susan B. Schub  
Regional Judicial Officer

**CERTIFICATE OF SERVICE**

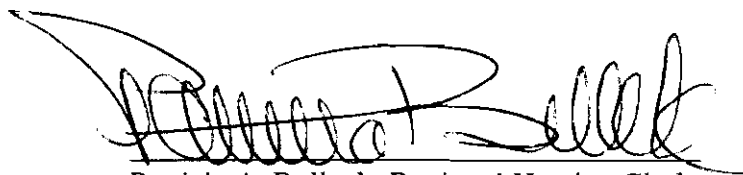
I hereby certify that on the date set out below, I filed the original and one copy of the foregoing Consent Agreement and Final Order and served a true and correct copy of the foregoing Consent Agreement and Final Order, In the Matter of Chemical Specialties, Inc., Docket Number: TSCA-04-2009-2625(b), to the addressees listed below.

Jonna Stein (via Certified Mail, Return Receipt Requested)  
Chemical Specialties, Inc.  
5910 Pharr Mill Road  
Harrisburg, North Carolina 28075

Mark Bean (via EPA's internal mail)  
Chemical Products and  
Asbestos Section  
U.S. EPA Region 4  
61 Forsyth Street, S.W.  
Atlanta, GA 30303

Robert Caplan (via EPA's internal mail)  
Office of Environmental Accountability  
U.S. EPA Region 4  
61 Forsyth Street, S.W.  
Atlanta, GA 30303

Date: 9-24-09



Patricia A. Bullock, Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 4  
Atlanta Federal Center  
61 Forsyth St., SW  
Atlanta, GA 30303  
(404) 562-9511

**EPA ACCOUNTS RECEIVABLE CONTROL NUMBER FORM**

**TO BE COMPLETED BY THE ORIGINATING OFFICE:**

(Attach a copy of the final order and transmittal letter to Defendant/Respondent)

This form was originated by: Saundi Wilson on 9/18/09  
(Name) (Date)

in the Region 4, ORC, OEA at (404) 562-9504  
(Office) (Telephone Number)

- |  |  |
|--|--|
| <input type="checkbox"/> Non-SF Judicial Order/Consent Decree<br>USAO COLLECTS | <input checked="" type="checkbox"/> Administrative Order/Consent Agreement<br>FMO COLLECTS PAYMENT |
| <input type="checkbox"/> SF Judicial Order/Consent Decree<br>DOJ COLLECTS      | <input type="checkbox"/> Oversight Billing - Cost Package required:<br>Sent with bill              |
| <input type="checkbox"/> Other Receivable                                      | <input type="checkbox"/> Not sent with bill  |
| <input type="checkbox"/> This is an original debt                              | <input type="checkbox"/> Oversight Billing - Cost Package not required                             |
|  | <input type="checkbox"/> This is a modification  |

PAYEE: Chemical Specialties Inc.  
(Name of person and/or Company/Municipality making the payment)

The Total Dollar Amount of the Receivable: \$ 33,431  
(If installments, attach schedule of amounts and respective due dates. See Other side of this form.)

The Case Docket Number: TSCA 04 2009 2625(b)

The Site Specific Superfund Account Number: \_\_\_\_\_

The Designated Regional/Headquarters Program Office: \_\_\_\_\_

The IFMS Accounts Receivable Control Number is: \_\_\_\_\_ Date \_\_\_\_\_

If you have any questions, please call: \_\_\_\_\_ of the Financial Management Section at: \_\_\_\_\_

**DISTRIBUTION:**

A. **JUDICIAL ORDERS:** Copies of this form with an attached copy of the front page of the **FINAL JUDICIAL ORDER** should be mailed to:

- |  |   |
|--|---|
| 1. Debt Tracking Officer<br>Environmental Enforcement Section<br>Department of Justice RM 1647<br>P.O. Box 7611, Benjamin Franklin Station<br>Washington, D.C. 20044 | 2. Originating Office (EAD)<br>3. Designated Program Office |
|--|---|

B. **ADMINISTRATIVE ORDERS:** Copies of this form with an attached copy of the front page of the Administrative Order should be to:

- |  |   |
|--|---|
| 1. Originating Office<br>2. Regional Hearing Clerk | 3. Designated Program Office<br>4. Regional Counsel (EAD) |
|--|---|