



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

REPLY TO THE ATTENTION OF:

L-8J

JAN 08 2013

HAND DELIVERED

Midwest College Painters, LLC.
1735 Tiverton Road, Suite 12
Bloomfield Hills, Michigan 48304
Attn: Mr. Antonio Lombardo

Re: Complaint against Midwest College Painters, LLC
Docket No: **TSCA-05-2013-0003**

Dear Mr. Lombardo:

I have enclosed a complaint filed by the U.S. Environmental Protection Agency, Region 5 against Midwest College Painters, LLC, under Section 16(a) of the Toxic Substances Control Act, 15 U.S.C. § 2615(a). The complaint alleges violations of the Residential Property Renovation Rule codified at 40 Code of Federal Regulations (C.F.R.) Part 745, Subpart E, implementing Sections 402(c) and 406(b) of Title IV of the Toxic Substances Control Act (TSCA), promulgated under 15 United States Code §§ 2682, 2686(b) and 2687.

As provided in the complaint, if you would like to request a hearing, you must do so in your answer to the complaint. Please note that if you do not file an answer with the Regional Hearing Clerk (E-19J), EPA, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604 within 30 days of your receipt of this complaint, a default order may be issued and the proposed civil penalty will become due 30 days later.

In addition, whether or not you request a hearing, you may request an informal settlement conference. To request a conference, or if you have any questions about this matter, you may contact Mr. Robert Peachey, Assistant Regional Counsel at (312) 353-4510.

Sincerely,

A handwritten signature in black ink, appearing to read "Margaret M. Guerriero".

Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:

Midwest College Painters, LLC,
Respondent.

) Docket No. TSCA-05-2013-0003
)
) Proceeding to Assess a Civil Penalty
) Under Section 16(a) of the Toxic Substances
) Control Act, 15 U.S.C. § 2615(a)
)
)

RECEIVED

JAN - 9 2013

Complaint

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

1. This is an administrative proceeding to assess a civil penalty of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2615(a).
2. The Complainant is, by lawful delegation, the Director of the Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.
3. Midwest College Painters, LLC (Midwest) is a corporation with a place of business at 1735 Tiverton Road, Suite 12, Bloomfield Hills, Michigan 48304.

Statutory and Regulatory Background

6. In promulgating the Residential Lead-Based Paint Hazard Reduction Act of 1992, Pub. L. No.102-550, Title X, 106 Stat. 3912 (1992) (Title X), Congress found, among other things, that low-level lead poisoning is widespread among American children, afflicting as many as 3,000,000 children under the age of six; at low levels, lead poisoning in children causes intelligence deficiencies, reading and learning disabilities, impaired hearing, reduced attention span, hyperactivity, and behavior problems; and the ingestion of household dust containing lead from deteriorating or abraded lead-based paint is the most common cause of lead poisoning in children. Key components of the national strategy to reduce and eliminate the threat of childhood lead poisoning is to educate the public concerning the hazards and sources of lead-

based paint poisoning and to take steps to reduce and eliminate such hazards. See 42 U.S.C. § 4851.

7. Section 1021 of Title X amended TSCA by adding Sections 401-412, entitled Lead Exposure Reduction, 15 U.S.C. §§ 2681 through 2692.

8. Pursuant to Section 402(c)(3) of TSCA, 15 U.S.C. § 2682(c)(3), EPA promulgated regulations amending 40 C.F.R. Part 745, Subparts E, F, and L, which apply to renovation or remodeling activities in target housing, public buildings constructed before 1978, and commercial buildings that create lead-based paint hazards. These regulations prescribe work practice standards and ensure that individuals engaged in such activities are properly trained, that the training programs are accredited, and that contractors engaged in such activities are certified. These requirements are known as the Renovation, Repair and Painting Program Rule (RRP Rule).

9. 40 C.F.R. § 745.83 defines “firm” as 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.

10. 40 C.F.R. § 745.83 defines “pamphlet” as the EPA pamphlet *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).

11. 40 C.F.R. § 745.83 defines “renovation” as 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 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, planing thresholds to install weather stripping), and interim controls that disturb painted surfaces.

12. 40 C.F.R. § 745.83 defines “renovator” as 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.

13. 40 C.F.R. § 745.103 defines “residential dwelling” as, among other things, a single-family dwelling, including attached structures such as porches and stoops.

14. 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.

15. Under 40 C.F.R. § 745.81(b), on or after December 22, 2008, firms performing renovations must provide owners and occupants with the EPA pamphlet *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools*.

16. Under 40 C.F.R. § 745.81(a)(4)(ii), on or after July 6, 2010, all renovations must be performed in accordance with the work practice standards in 40 C.F.R. § 745.85 and the associated recordkeeping requirements in 40 C.F.R. § 745.86(b)(6) in target housing or child-occupied facilities, unless the renovation qualifies for the exception identified in 40 C.F.R. § 745.82(a).

17. Under 40 C.F.R. § 745.82(a)(2)(ii), no firm may perform, offer, or claim to perform renovations on or after April 22, 2010 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).

18. Under 40 C.F.R. § 745.82(a), the requirements of 40 C.F.R. Part 745, Subpart E, do not apply to renovations performed for compensation in target housing and child-occupied facilities if an inspector, risk assessor or certified renovator has determined in writing that the components affected by the renovation are free of lead-based paint, as set forth in 40 C.F.R. § 745.82(a)(1).

19. Under 15 U.S.C. § 2689 and 40 C.F.R. § 745.87(a), failing to comply with any requirement of 40 C.F.R. Part 745, Subpart E, violates Section 409 of TSCA, 15 U.S.C. § 2689, which may subject the violator to civil penalties under Section 16(a) of TSCA, 15 U.S.C. § 2615(a) and 40 C.F.R. § 745.87(d).

20. The Administrator of EPA may assess a civil penalty of up to \$37,500 for each violation of Section 409 of TSCA that occurred after January 12, 2009, pursuant to Section 16(a) of TSCA, 15 U.S.C. § 2615, 40 C.F.R. § 745.87(d), and 40 C.F.R. Part 19.

General Allegations

21. Complainant incorporates paragraphs 1 through 20 of this Complaint as if set forth in this paragraph.
22. Midwest is a “firm,” as defined at 40 C.F.R. § 745.83.
23. Midwest is a “renovator” as defined at 40 C.F.R. § 745.83.
24. Every employee of Midwest who performs or direct workers to perform renovations is a “renovator,” as defined at 40 C.F.R. § 745.83.
25. On or about June 13, 2011, Midwest entered into a contract to conduct work on a single-family dwelling located at 235 Elvin Court, Lansing, Michigan (the Property).
26. On or about June 13, 2011, the Property owners notified Midwest employees that the Property was currently occupied by a pregnant woman and a four-year-old child.
27. The Property was constructed in 1905.
28. The Property is “target housing” as defined in 40 C.F.R. § 745.103.
29. The Property is a “residential dwelling” as defined in 40 C.F.R. § 745.103.
30. The contract referenced in paragraph 25 specified that Midwest would scrape paint from two sides of the house, two sides of the garage, the windows, wood trim, soffits and fascia, and two doors on the Property.
31. The work described in paragraph 30 is “renovation,” as defined at 40 C.F.R. § 745.83.
32. On or about July 18, 2011, Midwest conducted the renovation referenced in paragraph 30 on the Property.
33. When Midwest offered, in the form of a contract, to perform the renovation referenced in paragraph 30, no written determination had been made by an inspector, risk

assessor, or certified renovator that the components of the Property affected by the renovation were free of lead-based paint, as set forth in 40 C.F.R. § 745.82(a)(1).

34. When Midwest began the renovation referenced in paragraph 30, no determination had been made by an inspector, risk assessor, or certified renovator that the components of the Property affected by the renovation were free of lead-based paint, as set forth at 40 C.F.R. § 745.82(a)(1).

35. The renovation described in paragraph 30 does not qualify for an exception under 40 C.F.R. § 745.82(a) from the requirements of 40 C.F.R. Part 745, Subpart E.

36. Under 40 C.F.R. § 745.81(b), Midwest was required to provide owners or occupants of the Property with the EPA pamphlet *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools* when it performed the renovation referenced in paragraph 30.

37. Midwest was required to perform the renovation referenced in paragraph 30 in accordance with the work practice standards in 40 C.F.R. § 745.85 and the associated recordkeeping requirements in 40 C.F.R. § 745.86(b)(6).

38. On or about December 8, 2011, EPA sent a Request for Information to Midwest at 1735 Tiverton Road, Suite 12, Bloomfield Hills, Michigan 48304 (the Bloomfield Hills address).

39. On or about December 29, 2011, EPA sent the Request for Information to Midwest via e-mail.

40. On or about August 14, 2012, EPA sent Midwest a letter stating that EPA was planning to file an administrative complaint against Midwest for violations of the RRP Rule, and that the complaint would seek a civil penalty ("Notice of Intent to File Administrative Complaint"). The letter was sent to Midwest at the Bloomfield Hills address. EPA asked

Midwest to identify any factors EPA should consider before issuing the complaint. EPA also asked Midwest to submit specific financial documents if Midwest believed there were financial factors which bore on Midwest's ability to pay the civil penalty.

41. On August 23, 2012, EPA sent a copy of the Notice of Intent to File Administrative Complaint to Midwest's registered agent at 5020 Northwind Drive, Suite 200, East Lansing, Michigan 48823.

42. On August 28, 2012, EPA sent a copy of the Notice of Intent to File Administrative Complaint to Midwest's registered agent via e-mail.

43. On September 5, 2012, EPA left voicemails with Midwest's registered agent and Midwest employees concerning the Notice of Intent to File Administrative Complaint, and e-mailed a copy of it to the Midwest employees contacted.

44. As of the date of this Complaint, Midwest has not responded to EPA's Request for Information referenced in paragraph 38, nor to EPA's Notice of Intent to File Administrative Complaint.

Count 1

45. Complainant incorporates paragraphs 1 through 44 of this Complaint as if set forth in this paragraph.

46. Under 40 C.F.R. § 745.81(a)(2)(ii), 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).

47. When Midwest performed the renovation referenced in paragraph 30, Midwest did not have certification from EPA under 40 C.F.R. § 745.89.

48. By performing the renovation referenced in paragraph 30 without certification from EPA under 40 C.F.R. § 745.89, Midwest violates 40 C.F.R. § 745.81(a)(2)(ii) and 15 U.S.C. § 2689.

Count 2

49. Complainant incorporates paragraphs 1 through 44 of this Complaint as if set forth in this paragraph.

50. Under 40 C.F.R. § 745.84(a)(1), no more than 60 days before beginning renovation activities in any residential dwelling unit of target housing, the firm performing the renovation must provide the owner of the unit with the pamphlet and obtain either a written acknowledgement from the owner that the owner has received the pamphlet or a certificate of mailing at least 7 days prior to the renovation.

51. When Midwest began the renovation referenced in paragraph 30, Midwest had not provided the owners of the Property with the pamphlet.

52. When Midwest began the renovation referenced in paragraph 30, Midwest had not obtained from the owners a written acknowledgement that the owners had received the pamphlet.

53. Midwest did not obtain a certificate of mailing of the pamphlet to the owners of the Property at least 7 days prior beginning to the renovation referenced in paragraph 30.

54. Midwest's failure to provide the owners of the Property with the pamphlet and to obtain from the owners either a written acknowledgement that the owners had received the pamphlet or a certificate of mailing at least 7 days prior to the renovation referenced in paragraph 30 violates 40 C.F.R. § 745.84(a)(1) and 15 U.S.C. § 2689.

Count 3

55. Complainant incorporates paragraphs 1 through 44 of this Complaint as if set forth in this paragraph.

56. Pursuant to 40 C.F.R. § 745.86(b)(6), records that must be retained pursuant to 40 C.F.R. § 745.86(a) include documentation of compliance with the work practice standards requirements of 40 C.F.R. § 745.85, such as documentation that a certified renovator was assigned to the project, that the certified renovator provide on-the-job training for workers used on the project, that the certified renovator performed or directed workers to perform all of the tasks described in 40 C.F.R. § 745.85(a), and that the certified renovator performed the post-renovation cleaning verification described in 40 C.F.R. § 745.85(b).

57. Midwest failed to retain documentation of compliance with the work practice standards requirements of 40 C.F.R. § 745.85 for the renovation referenced in paragraph 30, including documentation that a certified renovator was assigned to the project, that the certified renovator provided on-the-job training for workers used on the project, that the certified renovator performed or directed workers to perform all of the tasks described in 40 C.F.R. § 745.85(a), and that the certified renovator performed the post-renovation cleaning verification described in 40 C.F.R. § 745.85(b).

58. Midwest's failure to retain documentation of compliance with the work practice standards requirements of 40 C.F.R. § 745.85 for the renovation referenced in paragraph 30 violates 40 C.F.R. § 745.86(b)(6) and 15 U.S.C. § 2689.

Count 4

59. Complainant incorporates paragraphs 1 through 44 of this Complaint as if set forth in this paragraph.

60. Under 40 C.F.R. § 745.85(b)(2), for each cleaning verification following an exterior renovation, a certified renovator must perform a visual inspection to determine whether dust, debris or residue is still present on surfaces in and below the work area, including windowsills and the ground. If dust, debris or residue is present, these conditions must be eliminated and another visual inspection must be performed.

61. Midwest failed to eliminate dust, debris, or residue that was present after the exterior renovation at the Property, and to perform another visual inspection.

62. By failing to eliminate dust, debris, or residue that was present after the exterior renovation at the Property, and to perform another visual inspection, Midwest violates 40 C.F.R. § 745.85(b)(2) and 15 U.S.C. § 2689.

Count 5

63. Complainant incorporates paragraphs 1 through 44 of this Complaint as if set forth in this paragraph.

64. 40 C.F.R. § 745.85(a)(5)(i)(A) requires firms to collect all paint chips and debris, and without dispersing any of it, to seal the material in a heavy-duty bag.

65. Midwest failed to collect all paint chips and debris, and without dispersing any of it, to seal the material in a heavy-duty bag.

66. By failing to collect all paint chips and debris, and without dispersing any of it, to seal the material in a heavy-duty bag, Midwest violates 40 C.F.R. § 745.85(a)(5)(i)(A) and 15 U.S.C. § 2689.

Proposed Civil Penalty

Complainant proposes that the Administrator assess a civil penalty against Midwest for the violations alleged in this Complaint as follows:

Count 1

15 U.S.C. § 2689 and 40 C.F.R. § 745.81(a)(2)(ii)\$22,500

Count 2

15 U.S.C. § 2689 and 40 C.F.R. § 745.84(a)(1)\$16,000

Count 3

15 U.S.C. § 2689 and 40 C.F.R. § 745.86(b)(6)\$3,000

Count 4

15 U.S.C. § 2689 and 40 C.F.R. § 745.85(b)(2)\$37,500

Count 5

15 U.S.C. § 2689 and 40 C.F.R. § 745.85(a)(5)(i)(A)\$37,500

Total Proposed Civil Penalty\$116,500

In determining the amount of any civil penalty, Section 16 of TSCA requires EPA to take into account the nature, circumstances, extent and gravity of the violations alleged and, with respect to the violator, ability to pay, effect on ability to continue to do business, any history of prior such violations, the degree of culpability and such other factors as justice may require.

EPA calculates penalties by applying its 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) (Response Policy). This Response Policy provides a fair, uniform, and consistent approach to the calculation methodology for applying the statutory factors to particular cases. Factors relevant to

assessing an appropriate penalty include the nature of the violations, the circumstances of the violations, the extent of harm that may result from given violations, and information pertaining to a violator's ability to pay a penalty.

As noted in paragraph 40, by letter dated August 14, 2012, EPA advised Midwest that EPA was planning to file an administrative complaint against Midwest for alleged violations of Section 409 of TSCA, and that Section 16 of TSCA authorizes the assessment of a civil penalty. EPA asked Midwest to identify any factors Midwest thought EPA should consider before issuing the complaint, and EPA asked Midwest to submit specific financial documents if Midwest believed there were financial factors that bore on Midwest's ability to pay a civil penalty. Midwest has submitted no information to EPA as of the date of this Complaint.

Rules Governing This Proceeding

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules) at 40 C.F.R. Part 22 govern this proceeding to assess a civil penalty. Enclosed with the Complaint is a copy of the Consolidated Rules.

Filing and Service of Documents

Midwest must file with the Regional Hearing Clerk the original and one copy of each document Midwest intends to include as part of the record in this proceeding. The Regional Hearing Clerk's address is:

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

Midwest must serve a copy of each document filed in this proceeding on each party pursuant to Section 22.5 of the Consolidated Rules, including the Presiding Officer.

Complainant has authorized Mr. Robert M. Peachey to receive any answer and subsequent legal documents that Midwest serves in this proceeding. You may telephone Mr. Peachey at (312) 353-4510. His address is:

Robert M. Peachey (C-14J)
Assistant Regional Counsel
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Penalty Payment

Midwest may resolve this proceeding, with respect to the counts alleged, at any time by paying the proposed penalty by certified or cashier's check payable to "Treasurer, United States of America" and by delivering the check to:

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

Midwest must include the case name on the check and in the letter transmitting the check. Midwest must simultaneously send copies of the check and transmittal letter to Mr. Peachey and to:

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

Answer and Opportunity to Request a Hearing

If Midwest contests any material fact upon which the Complaint is based or the appropriateness of any penalty amount, or contends that it is entitled to judgment as a matter of law, Midwest may request a hearing before an Administrative Law Judge. Midwest must file a

written Answer within 30 days of receiving this Complaint and must include in that written Answer a request for a hearing. Any hearing will be conducted according to the Consolidated Rules.

In counting the 30-day time period, the date of receipt is not counted, but Saturdays, Sundays, and federal legal holidays are counted. If the 30-day time period expires on a Saturday, Sunday, or federal legal holiday, the time period extends to the next business day.

To file an answer, the filing party must file the original written answer and one copy with the Regional Hearing Clerk at the address specified above, as well as with the Presiding Officer.

The party's written answer must clearly and directly admit, deny, or explain each of the factual allegations in the Complaint; or must state clearly that the party has no knowledge of a particular factual allegation. Where the party states that it has no knowledge of a particular factual allegation, the allegation is deemed denied. The party's failure to admit, deny, or explain any material factual allegation in the Complaint constitutes an admission of the allegation. The answer must also state:

- a. The circumstances or arguments which the party alleges constitute grounds of defense;
- b. The facts that the party disputes;
- c. The basis for opposing the proposed penalty; and
- d. Whether the party requests a hearing.

If Midwest does not file a written answer within 30 calendar days after receiving this Complaint, the Presiding Officer may issue a default order, after motion, under Section 22.17 of the Consolidated Rules against the defaulting party. Default by Midwest constitutes an admission of all factual allegations in the Complaint against Midwest, and a waiver of Midwest's right to contest the factual allegations. The defaulting party must pay any penalty assessed in a

default order without further proceedings 30 days after the order becomes the final order of the Administrator of EPA under Section 22.27(c) of the Consolidated Rules.

Settlement Conference

Whether or not Midwest requests a hearing, Midwest may request an informal settlement conference to discuss the facts of this proceeding and to arrive at a settlement on the particular counts alleged. To request an informal settlement conference, Midwest may contact Mr. Peachey at the address provided above.

A request by Midwest for an informal settlement conference does not extend the 30-calendar-day period for filing a written Answer to this Complaint. All parties may pursue simultaneously the informal settlement conference and the adjudicatory hearing process. The Complainant encourages all parties facing civil penalties to pursue settlement through an informal conference. The Complainant, however, will not reduce the penalty simply because the parties hold an informal settlement conference.


Continuing Obligation to Comply

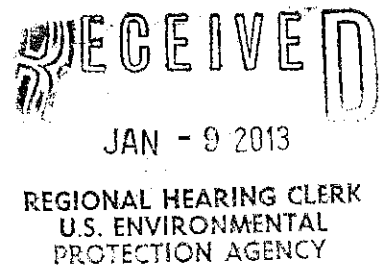
Payment of the civil penalty by Midwest will not satisfy the legal obligation of Midwest to comply with TSCA and any other applicable federal, state or local law.

Consent Agreement and Final Order

EPA has authority, where appropriate, to modify the amount of the proposed penalty to reflect any settlement reached with Midwest in an informal conference. The terms of the settlement would be embodied in a Consent Agreement and Final Order. A Consent Agreement signed by a settling party and EPA is binding when the Regional Administrator signs the Final Order, and it is filed with the Regional Hearing Clerk.

January 8, 2013
Date


Margaret M. Guerriero
Director
Land and Chemicals Division


JAN - 9 2013
REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

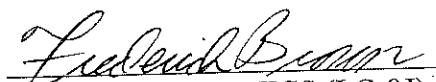
CERTIFICATE OF SERVICE

This is to certify that the original and one copy of this Complaint against Midwest College Painters, LLC., was filed on January 9, 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 will be hand delivered to Midwest College Painters, LLC., ATTN: Mr. Antonio Lombardo, along with a copy each of the "Consolidated Rules of Practice, 40 C.F.R. Part 22," and "Section 1018 Disclosure Rule Enforcement Response Policy" to:

Midwest College Painters, LLC
1735 Tiverton Road, Suite 12
Bloomfield Hills, Michigan 48304
ATTN: Mr. Antonio Lombardo

and forwarded intra-Agency copies to:

Ann Coyle, Regional Judicial Officer, ORC/C-14J
Robert M. Peachey, Counsel for Complainant/C-14J
Eric Volck, Cincinnati Finance/MWD


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

Docket No. TSCA-05-2013-0003



JAN - 9 2013

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY