

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**FILED**

Apr 17, 2025

3:02 pm

U.S. EPA REGION 5  
HEARING CLERK

<b>In the Matter of:</b>	)	<b>Docket No. CAA-05-2025-0023</b>
	)	
<b>Westwood Lands, Inc.</b>	)	<b>Proceeding to Assess a Civil Penalty</b>
<b>Madison, Illinois,</b>	)	<b>Under Section 113(d) of the Clean Air Act,</b>
	)	<b>42 U.S.C. § 7413(d)</b>
<b>Respondent.</b>	)	
_____	)	

**Consent Agreement and Final Order**

**A. Preliminary Statement**

1. This is an administrative penalty assessment proceeding commenced and concluded under Section 113(d) of the Clean Air Act (the CAA), 42 U.S.C. § 7413(d), and Sections 22.1(a)(2), 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. §§ 22.1(a)(2), 22.13(b) and 22.18(b)(2) and (3).
2. Complainant is the U.S. Environmental Protection Agency (EPA). The EPA Administrator has delegated the authority to settle civil administrative penalty proceedings under Section 113(d) of the CAA to the Division Director of the Region 5 Enforcement and Compliance Assurance Division.
3. Respondent is Westwood Lands, Inc., a corporation doing business in Illinois. Respondent is a “person,” as defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
4. The EPA and Respondent agree that settling this action is in the public interest and consent to the entry of this Consent Agreement and Final Order (CAFO) without the adjudication of any issues of law or fact.
5. Respondent agrees to comply with the terms of this CAFO.

## **B. Jurisdiction**

6. The alleged violations in this CAFO are pursuant to Section 113(a)(1)(B) of the CAA.

7. The EPA and the United States Department of Justice have jointly determined that this matter, although it involves alleged violations that occurred more than one year before the initiation of this proceeding, is appropriate for an administrative penalty assessment. 42 U.S.C. § 7413(d); 40 C.F.R. § 19.4.

8. In satisfaction of the notice requirements of Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), on December 21, 2023, the EPA issued to Respondent a Notice of Violation (NOV) and provided a copy of the NOV to the Illinois Environmental Protection Agency (“IEPA”), providing notice to Respondent and IEPA that the EPA found Respondent committed the alleged violations described in Section E of this CAFO and providing Respondent an opportunity to confer with the EPA. On February 1, 2024, representatives of Respondent and the EPA conferred regarding the December 21, 2023, NOV.

9. The Regional Judicial Officer of Region 5 is authorized to ratify the consent agreement memorializing the settlement between the EPA and Respondent and to issue the attached Final Order. 40 C.F.R. §§ 22.4(b) and 22.18(b).

## **C. Statutory and Regulatory Background**

10. On May 31, 1972, EPA approved 35 Illinois Administrative Code (“Ill.Adm.Code”) Part 201, “Permits and General Provisions,” into the federally enforceable State Implementation (SIP) of Illinois. 37 Fed. Reg. 10862 (May 31, 1972) (codified at 40 C.F.R. § 52.722). Since then, EPA has approved several revisions of 35 Ill.Adm.Code Parts 201 through 283 into the federally enforceable SIP. See 40 C.F.R. § 52.720.

11. On December 17, 1992, EPA approved the Illinois Federally Enforceable State Operating Permit program into the Illinois SIP. 57 Fed. Reg. 59928.

12. On March 7, 2017, the Illinois Environmental Protection Agency (“IEPA”) issued a Federally Enforceable State Operating Permit, No. 15110015, to Westwood Lands, Inc (“the FESOP”).

13. On July 14, 1999, EPA approved 35 Ill.Adm.Code 212.302 as part of the federally enforceable SIP for Illinois. 64 Fed. Reg. 37847.

14. Pursuant to 35 Ill.Adm.Code 212.302(a), Sections 212.304 through 212.310 and 212.312 of Subpart K apply to all mining operations (SIC major groups 10 through 14), manufacturing operations (SIC major groups 20 through 39 except for those operations subject to Subpart S of Part 212 (Grain-Handling and Grain-Drying Operations) that are outside the areas defined in Section 212.324(a)(1)), and electric generating operations (SIC group 491), which are located in the areas defined by the boundaries of specific townships, including Granite City.

15. On April 26, 1982, EPA approved 35 Ill.Adm.Code 212.304 and 35 Ill.Adm.Code 212.305 as part of the federally enforceable SIP for Illinois. 47 Fed. Reg. 17814.

16. On February 21, 1980, EPA approved 35 Ill.Adm.Code 212.306, 35 Ill.Adm.Code 212.307, and 35 Ill.Adm.Code 212.308 as part of the federally enforceable SIP for Illinois. 45 Fed. Reg. 11472.

17. Sections 212.304 through 212.308 describe emissions units such as the following: storage piles, traffic areas, crushers, conveyor transfer points, and conveyors.

18. EPA approved 35 Ill.Adm.Code 212.309 as part of the federally enforceable SIP for Illinois. 64 Fed. Reg. 37847 (July 14, 1999).

19. Pursuant to 35 Ill.Adm.Code 212.309(a) and Condition 6.d. of the FESOP, the emission units described in 35 Ill.Adm.Code 212.304 through 212.308 and 35 Ill.Adm.Code 212.316 must be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill.Adm.Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the

IEPA for its review. Such operating program must be designed to significantly reduce fugitive particulate matter emissions.

20. On February 21, 1980, EPA approved 35 Ill.Adm.Code 212.310 as part of the federally enforceable SIP. 45 Fed. Reg, 11472.

21. Pursuant to 35 Ill.Adm.Code 212.310, a minimum operating program must, among other things, include a detailed description of the best management practices utilized to achieve compliance with 35 Ill.Adm.Code 212 Subpart K and the estimated frequency of application of dust suppressants by location of materials. Best management practices include an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized.

22. On February 21, 1980, EPA approved 35 Ill.Adm.Code 212.312 as part of the federally enforceable SIP for Illinois. 45 Fed. Reg. 11472.

23. Pursuant to 35 Ill.Adm.Code 212.312 and Condition 6.g. of the FESOP, the operating program must be amended from time to time by the owner or operator so that the operating program is current. The permit requires such amendments to be consistent with 35 Ill.Adm.Code 212 Subpart K and to be submitted to the IEPA for its review.

24. Condition 6.g. of the FESOP further states that any future revision to the operating program made by the permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA.

25. On March 11, 1998, EPA approved 35 Ill.Adm.Code 212.324 as part of the federally enforceable SIP for Illinois. 63 Fed. Reg. 11842.

26. Pursuant to 35 Ill.Adm.Code 212.324(a)(1)(C), 35 Ill.Adm.Code 212.324 applies to any process emission unit located in that area bounded by lines from Universal Transmercator (UTM)

coordinate 744000mE, 4290000mN, east to 753000mE, 4290000mN, south to 753000mE, 4283000mN, west to 744000mE, 4283000mN, north to 744000mE, 4290000mN, in the vicinity of Granite City in Madison County.

27. Pursuant to 35 Ill.Adm.Code 212.324(f) and Condition 6.h. of the FESOP, for any process emission unit subject to 35 Ill.Adm.Code 212.324(a), the owner or operator must maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 Ill.Adm.Code 212.324 shall be met at all times. Proper maintenance must include the following minimum requirements:

- a. Visual inspections of air pollution control equipment;
- b. Maintenance of an adequate inventory of spare parts; and
- c. Expeditious repairs, unless the emission unit is shutdown.

#### **D. Stipulated Facts**

28. Westwood Lands owns and operates a slag processing facility (Facility) at 4 Caine Drive, Madison, Illinois, located within the Granite City area.

29. Westwood Lands identifies the Facility's Standard Industrial Classification (SIC) code as 3295, which is a part of SIC major group 32, and the Facility is located in the vicinity of Granite City. The Facility is therefore subject to 35 Ill.Adm.Code 212.302(a) and 35 Ill.Adm.Code 212.324.

30. Westwood Lands operates storage piles, traffic areas, crushers, conveyor transfer points, and conveyors at the Facility and is therefore subject to 35 Ill.Adm.Code 212.309(a).

31. The Facility operates Baghouses BH-1, BH-2, and BH-3 ("the baghouses") as air pollution control devices, which reduce particulate matter emissions from its slag processing operation.

32. On May 17, 2023, EPA conducted an inspection at the Facility (the inspection).

33. On the inspection, EPA noted the condition of the baghouses and associated pressure gauges. EPA also recorded pressure drop measurements of the baghouses.

34. Westwood Lands, Inc. provided information responsive to the inspection on August 10 and October 14, 2023, which included: 1) information on visible emission observations; 2) corrective actions and measures taken to comply with the Facility's minimum operating program, hereafter known as its Fugitive Particulate Operating Program ("FPOP"); 3) recordkeeping and monitoring activities relating to the implementation of its wet suppression systems; 4) the maintenance and repair of its air quality control equipment; and 5) the manufacturer's guidelines for the baghouses.

35. The FPOP contains several operating practices including daily visible emissions observations for fugitive dust, corrective actions when observing visible emissions, use of the Facility's wet suppression system, and recordkeeping associated with these actions.

36. On December 21, 2023, EPA issued to Westwood Lands a Notice of Violation alleging that it violated 35 Ill.Adm.Code 212.309(a) and Condition 6.d. of the FESOP by failing to follow the operating requirements in its FPOP, thereby failing to significantly reduce its fugitive emissions from the period of August 11, 2021 to August 10, 2023. EPA also alleged that Westwood Lands violated 35 Ill.Adm.Code 212.324(f) and Condition 6.h. of the FESOP at the Facility by failing to maintain and expeditiously repair the baghouses in a manner that assures that the emission limits and standards in 35 Ill.Adm.Code 212.324 are met at all times.

37. On February 1, 2024, representatives of Westwood Lands and EPA discussed the December 21, 2023, Notice of Violation.

38. On March 20, 2024, Westwood Lands submitted its response the December 21, 2023, NOV, which detailed the actions it had taken since it had received the NOV.

39. From December 21, 2023, to March 20, 2024, Respondent completed the following actions:

- a. Westwood Lands had a staff member successfully complete the field test for Method 9 certification;
- b. Westwood Lands incorporated an additional water spray system at its Facility to supplement its water cannon;
- c. Westwood Lands repaired the baghouses and associated pressure gauges; and
- d. Westwood Lands purchased spare replacement filters for the baghouses.

#### **E. Allegations**

40. Westwood Lands, Inc. violated 35 Ill.Adm.Code 212.309(a) and Condition 6.d. of the FESOP by failing to significantly reduce its fugitive emissions from the period of August 11, 2021 to August 10, 2023, specifically as follows:

- a. From August 20, 2021, to July 14, 2023, Westwood Lands, Inc. did not conduct daily visible emissions observations as required by its FPOP on 5 occasions.
- b. From August 11, 2021, to August 1, 2023, Westwood Lands, Inc. did not utilize its water cannon to reduce visible emissions from front-end loader material movements as required by its FPOP on 71 occasions.
- c. From June 26, 2023, to June 28, 2023, Westwood Lands, Inc. did not conduct the corrective actions required by its FPOP on 3 occasions.
- d. From August 11, 2021, to August 10, 2023, Westwood Lands, Inc. did not utilize its water cannon as required by its FPOP on 448 occasions.

41. Westwood Lands, Inc. violated 35 Ill.Adm.Code 212.324(f) and Condition 6.h. of the FESOP by failing to maintain and expeditiously repair the baghouses in a manner that assures that the

emission limits and standards in 35 Ill.Adm.Code 212.324 are met at all times, from the period May 8, 2023 to March 20, 2024 as follows:

- a. On May 17, 2023, Westwood Lands, Inc. operated the baghouses outside of their normal pressure drop range;
- b. From May 8, 2023, to August 30, 2023, Westwood Lands, Inc operated its emissions units while at least one of the baghouses was in need of repair;
- c. From May 8, 2023, to March 20, 2024, Westwood Lands, Inc failed to maintain an adequate inventory of clean bags for the baghouses; and
- d. From May 8, 2023, to August 30, 2023, Westwood Lands, Inc failed to conduct expeditious repairs on the baghouses.

#### **F. Terms of Consent Agreement**

42. For the purposes of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:
  - a. admits to the jurisdictional allegations in this CAFO;
  - b. admits to the stipulated facts stated in Section D of this CAFO and neither admits nor denies the allegations stated in Section E of this CAFO;
  - c. consents to the assessment of a civil penalty as stated below;
  - d. consents to any conditions specified in this CAFO;
  - e. waives any right to contest the allegations set forth in Section E of this CAFO; and
  - f. waives its right to appeal this CAFO.
43. For the purposes of this proceeding, Respondent:
  - a. agrees this CAFO states a claim upon which relief may be granted against Respondent;



- b. acknowledges this proceeding constitutes an enforcement action for purposes of considering Respondent's compliance history in any subsequent enforcement actions;
- c. waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this CAFO, including any right of judicial review under Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1);
- d. waives its right to request a hearing as provided at 40 C.F.R. §22.15(c);
- e. waives any rights or defenses that Respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the final order accompanying the consent agreement; and
- f. waives any rights it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to compel compliance with the CAFO, and to seek an additional penalty for noncompliance, and agrees that federal law shall govern in any such civil action.

44. Based on analysis of the factors specified in Section 113(e) of the CAA, 42 U.S.C. § 7413(e), the facts of this case, and Respondent's cooperation, the EPA has determined that an appropriate civil penalty to settle this action is \$75,000.

45. Respondent agrees to pay a civil penalty in the amount of \$75,000 ("Assessed Penalty") within thirty (30) days after the date the Final Order ratifying this Agreement is filed with the Regional Hearing Clerk ("Filing Date").

46. Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA website:

<https://www.epa.gov/financial/makepayment>. For additional instructions see:

<https://www.epa.gov/financial/additional-instructions-making-payments-epa>.

47. When making a payment, Respondent shall:

- a. Identify every payment with Respondent's name and the docket number of this Agreement, CAA-05-2025-0023,

- b. Concurrently with any payment or within 24 hours of any payment, Respondent shall serve proof of such payment to the following person(s):

Regional Hearing Clerk (E-19J)  
U.S. Environmental Protection Agency, Region 5  
[r5hearingclerk@epa.gov](mailto:r5hearingclerk@epa.gov)

Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency, Region 5  
[R5airenforcement@epa.gov](mailto:R5airenforcement@epa.gov)

David Duckett  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 5  
[duckett.david@epa.gov](mailto:duckett.david@epa.gov)

U.S. Environmental Protection Agency  
Cincinnati Finance Center  
Via electronic mail to:  
[CINWD\\_AcctsReceivable@epa.gov](mailto:CINWD_AcctsReceivable@epa.gov)

“Proof of payment” means, as applicable, a copy of the check, confirmation of credit card or debit card payment, or confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent’s name.

48. Interest, Charges, and Penalties on Late Payments. Pursuant to 42 U.S.C. § 7413(d)(5), 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay the full amount of the Assessed Penalty per this Agreement, the entire unpaid balance of the Assessed Penalty and all accrued interest shall become immediately owing, and the EPA is authorized to recover the following amounts.

- a. Interest. Interest begins to accrue from the Filing Date. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. Per 42 U.S.C. § 7413(d)(5), interest will be assessed pursuant to 26 U.S.C. § 6621(a)(2), that is the IRS standard

underpayment rate, equal to the Federal short-term rate plus 3 percentage points.

- b. Handling Charges. The United States' enforcement expenses including, but not limited to, attorney's fees and costs of handling collection.
- c. Late Payment Penalty. A ten percent (10%) quarterly non-payment penalty.

49. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Agreement, the EPA may take additional actions. Such actions the EPA may take include, but are not limited to, the following.

- a. Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R. §§ 13.13 and 13.14.
- b. Collect the debt by administrative offset (i.e., the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, per 40 C.F.R. Part 13, Subparts C and H.
- c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with EPA or engaging in programs EPA sponsors or funds, per 40 C.F.R. § 13.17.
- d. Request that the Attorney General bring a civil action in the appropriate district court to enforce the Final Order and recover the full remaining balance of the Assessed Penalty, in addition to interest and the amounts described above, pursuant to 42 U.S.C. § 7413(d)(5). In any such action, the validity, amount, and appropriateness of the Assessed Penalty and Final Order shall not be subject to review.

50. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.

51. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Agreement shall not be deductible for purposes of federal taxes.

52. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, EPA is required to send to the Internal Revenue Service (“IRS”) annually, a completed IRS Form 1098-F (“Fines, Penalties, and Other Amounts”) with respect to any court order or settlement agreement (including administrative settlements), that require a payor to pay an aggregate amount that EPA reasonably believes will be equal to, or in excess of, \$50,000 for the payor’s violation of any law or the investigation or inquiry into the payor’s potential violation of any law, including amounts paid for “restitution or remediation of property” or to come “into compliance with a law.” EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (i.e., a copy of IRS Form 1098-F). Failure to comply with providing IRS Form W-9 or Tax Identification Number (“TIN”), as described below, may subject Respondent to a penalty, per 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1. In order to provide EPA with sufficient information to enable it to fulfill these obligations, EPA herein requires, and Respondent herein agrees, that:

- a. Respondent shall complete an IRS Form W-9 (“Request for Taxpayer Identification Number and Certification”), which is available at <https://www.irs.gov/pub/irs-pdf/fw9.pdf>;
- b. Respondent shall therein certify that its completed IRS Form W-9 includes Respondent’s correct TIN or that Respondent has applied and is waiting for issuance of a TIN;
- c. Respondent shall email its completed Form W-9 to EPA’s Cincinnati Finance Center at [wise.milton@epa.gov](mailto:wise.milton@epa.gov), within 30 days after the Final Order ratifying this Agreement is filed, and EPA recommends encrypting IRS Form W-9 email correspondence; and
- d. In the event that Respondent has certified in its completed IRS Form W-9 that it does not yet have a TIN but has applied for a TIN, Respondent shall provide EPA’s Cincinnati Finance Center with Respondent’s TIN, via email, within five (5) days of Respondent’s receipt of a TIN issued by the IRS.

53. By signing this CAFO, Respondent consents to the release of any information in this CAFO to the public and agrees this CAFO does not contain business information that is entitled to confidential treatment under 40 C.F.R. Part 2.

54. By signing this CAFO, the undersigned representative of the EPA and the undersigned representative of Respondent each certify that they are fully authorized to execute and enter into the terms and conditions of this CAFO and have the legal capacity to bind the party they represent to this CAFO.

55. By signing this CAFO, Respondent certifies the information it has supplied concerning this matter was at the time of submission true, accurate, and complete for each such submission, response, and statement. Respondent acknowledges that, under 18 U.S.C. § 1001, there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information.

56. Each party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding, except in the case of a civil action brought by the Attorney General of the United States to recover unpaid penalties as described above.

**G. Effect of Consent Agreement and Attached Final Order**

57. The parties consent to service of this CAFO by e-mail at the following e-mail addresses: duckett.david@epa.gov (for the EPA), and dewatson@cecinc.com (for Respondent).

58. In accordance with 40 C.F.R. § 22.18(c), completion of the terms of this CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts specifically alleged in this CAFO.

59. This CAFO constitutes the entire agreement and understanding of the parties and supersedes any prior agreements or understandings, whether written or oral, among the parties with

respect to this matter with the exception of the administrative compliance order, docket number EPA-5-25-113(a)-IL-2 issued on December 31, 2024.

60. The terms, conditions, and compliance requirements of this CAFO may not be modified or amended except upon the written agreement of both parties and approval of the Regional Judicial Officer.

61. The provisions of this Agreement shall apply to and be binding upon Respondent and its officers, directors, authorized representatives, successors, and assigns.

62. Any violation of this CAFO may result in a civil judicial action for an injunction or civil penalties of up to \$124,426 per day per violation, or both, as provided in Section 113(b) of the CAA, 42 U.S.C. § 7413(b), and 40 C.F.R. § 19.4, as well as criminal sanctions as provided in Section 113(c) of the CAA, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this CAFO in an administrative, civil judicial, or criminal action.

63. Nothing in this CAFO relieves Respondent of the duty to comply with all applicable provisions of the CAA and other federal, state, or local laws or statutes, nor does it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor is it a ruling on, or determination of, any issue related to any federal, state, or local permit.

64. Nothing in this CAFO limits the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.

65. The EPA reserves the right to revoke this CAFO and settlement penalty if and to the extent that the EPA finds, after signing this CAFO, that any information provided by Respondent was materially false or inaccurate at the time such information was provided to the EPA, and to assess and collect any civil penalties permitted by statute for any violation described herein. The EPA will give

Respondent written notice of its intent to revoke this CAFO, which will not be effective until received by Respondent.

#### **H. Effective Date**

66. This CAFO will be effective after the Regional Judicial Officer executes the attached Final Order, on the date of filing with the Regional Hearing Clerk. Upon filing, the EPA will transmit a copy of the filed CAFO to Respondent.

**Westwood Lands, Inc., Respondent**

3/27/2025  
Date

Jim O'Dovero  
Jim O'Dovero, Director  
Westwood Lands, Inc.



**United States Environmental Protection Agency, Complainant**

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Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency, Region 5

**Consent Agreement and Final Order**  
**In the Matter of: Westwood Lands, Inc.**  
**Docket No. CAA-05-2025-0023**

**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.

\_\_\_\_\_  
Date

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