



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

MAY 19 2016

CERTIFIED MAIL 7015 1730 0001 8044 2968  
RETURN RECEIPT REQUESTED

Mr. Dave Townsend  
Vice President, Environmental  
Pilgrim's Pride Corporation  
949 Industrial Boulevard  
Gainesville, Georgia 30501

Re: Consent Agreement and Final Order  
Docket No. CWA-04-2016-4501(b)  
Pilgrim's Pride, 949 Industrial Boulevard, Gainesville, Hall County, Georgia

Dear Mr. Townsend:

Enclosed please find a fully executed copy of the Consent Agreement and Final Order which has been finalized by the U.S. Environmental Protection Agency and the Regional Administrator. Please make note of the provisions under Paragraph IV. Payment.

Should you have any questions or problems, please contact LCDR Tara L. Houda at (404) 562-9762.

Sincerely,

A handwritten signature in blue ink, appearing to read "James D. Giattina".

James D. Giattina  
Director  
Water Protection Division

Enclosure

cc: Mr. Bert Langley  
Georgia Environmental Protection Division

Mr. Steven P. Case  
McGrath North Mullin & Kratz, PC LLO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

HEARING CLERK

2016 MAY 19 PM 3:32

USEPA REGION 4  
OFFICE OF REGIONAL  
COUNCIL

IN THE MATTER OF: )  
 )  
Pilgrim's Pride Corporation ) CONSENT AGREEMENT AND  
949 Industrial Boulevard ) FINAL ORDER  
Gainesville, Hall County, Georgia )  
 )  
RESPONDENT. ) DOCKET NO. CWA-04-2016-4501(b)  
\_\_\_\_\_ )

**CONSENT AGREEMENT**

**I. Statutory Authority**

1. This is a civil penalty proceeding pursuant to Section 309(g)(2)(B) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(g)(2)(B), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, including Subpart I, published at 64 Fed. Reg. 40176 (July 23, 1999) and codified at 40 Code of Federal Regulations ("C.F.R.") Part 22.

2. The authority to take action under Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), is vested in the Administrator of the United States Environmental Protection Agency. The Administrator has delegated this authority to the Regional Administrator, Region 4, who in turn has delegated this authority to the Director of the Water Protection Division of the EPA, Region 4 ("Complainant").

**II. Allegations**

3. Pilgrim's Pride Corporation ("Respondent") is a corporation duly organized and existing under the laws of the State of Georgia and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

4. At all times relevant to this action, Respondent owned and/or operated an industrial facility known as Pilgrim's Pride ("Facility") located 949 Industrial Boulevard, in Gainesville, Georgia.

5. To accomplish the objective of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of

pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System (“NPDES”) permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

6. Section 402 of the CWA, 33 U.S.C. § 1342, establishes a NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants, including stormwater, into navigable waters subject to specific terms and conditions. The EPA has granted the State of Georgia, through the Georgia Environmental Protection Division (“GAEPD”), approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

7. GAEPD issued the *Authorization to Discharge Under The National Pollutant Discharge Elimination System Stormwater Discharges Associated With Industrial Activity*, Permit No.: GAR050000 (Permit), effective June 1, 2012 (“Permit”), in accordance with the Georgia Water Quality Control Act (O.C.G.A. Code Sections 12-5-20 *et seq.*, 1964), the Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6, and the CWA. The Permit was effective June 1, 2012, and shall expire on May 31, 2017. Coverage under the Permit is obtained by submitting a Notice of Intent (“NOI”) to the GAEPD.

8. On June 28, 2012, Respondent submitted a NOI to GAEPD requesting coverage under the Permit for the Facility.

9. On August 27, 2014, the EPA performed a Compliance Stormwater Evaluation Inspection (“CSWEI”) at the Facility to evaluate compliance with the requirements of Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p), the regulations promulgated thereunder at 40 C.F.R. § 122.26, and the Permit. On January 28, 2015 the EPA sent a Notice of Violation (NOV) to Respondent for alleged violations of the CWA and the Permit.

10. The Permit includes the following conditions:

- a. **Permit Part 1.2.** Provides that any noncompliance with any of the requirements of this permit constitutes a violation of the Clean Water Act (CWA) and the Georgia Water Quality Control Act (WQCA). As detailed in Part 3 (Corrective Actions) of this permit, failure to take any required corrective actions constitutes an independent, additional violation of this permit, under the CWA and the WQCA.
- b. **Permit Part 1.1.4.1.** Storm water discharges that are mixed with non-storm water, other than those allowable non-storm water discharges listed in Part 1.1.3, are not eligible for coverage under this permit. Typical non-allowable non-storm water includes: (b) vehicle and equipment washwater and (f) pavement wash water from containment zones.

- c. **Permit Part 2.1.2.1. Minimize Exposure.** Permittees must minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance and fueling operations) to rain, snowmelt and runoff by either locating these industrial materials and actives inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface areas is not recommended). In minimizing exposure, permittees should pay particular attention to the following: (g) perform all cleaning operations indoors, under cover or in bermed areas that prevent runoff and run-on and also that capture any overspray; and (h) ensure that all wash water drains to a proper collection system (i.e., not the storm water drainage system).  
Note 1: The discharge of vehicle and equipment wash water, including tank-cleaning operations, is not authorized by this permit.
- d. **Permit Part 2.1.2.2. Good Housekeeping.** Permittees must keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.
- e. **Permit Part 3.2. Conditions Requiring Review to Determine if Modifications Are Necessary.** If any of the following conditions occur, permittees must review the selection, design, installation, and implementation of control measures 2.1.21.1 through 2.1.2.9: (b) the annual sampling result exceeds an applicable benchmark.
- f. **Permit Part 3.3. Corrective Action Deadlines.** Permittees must document the discovery of any of the conditions listed in Parts 3.1 and 3.2 within 24-hours of making such discovery. Subsequently, within 30 days of such discovery, permittees must document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination. Specific documentation required is detailed in Part 3.4. If permittees determine that changes are necessary following the review, any modifications to control measures must be made as soon as practicable following that storm event, but in no case more than ninety (90) days after the discovery, unless additional time is approved by EPD.
- g. **Permit Part 3.4.1. Corrective Action Discovery.** Within 24 hours of discovery or by the end of the next business day (see 3.3. above) of any condition listed in Parts 3.1 and 3.2, permittees must document the following information: (a) Identification of the condition triggering the need for corrective action review; (b) Description of the problem identified; and (c) Date the problem was identified.
- h. **Permit Part 3.4.1.2. Additional Documentation of Corrective Action.** (a) Corrective actions must be documented in the SWPPP; and (b) Corrective actions must be documented in the annual report.

- i. **Permit Part 4.1.1. Routine Facility Inspection Procedures.** These routine inspections must be performed by qualified personnel (for definition, see Appendix A) with at least one member of the storm water pollution prevention team participating. At least once each calendar year, the routine facility inspection must be conducted during a period when a storm water discharge is occurring.
- j. **Permit Part 4.2.1.2. Visual assessment must be made:** (b) on samples collected within the first 30 minutes of discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as possible after the first 30 minutes, and the permittee must document why it was not possible to take sample within the first 30 minutes.
- k. **Permit Part 5.1.1.2. Employee Training.** Permittees must train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Rosters of employee training or certificates of completion that include individual names and training dates must be maintained with the SWPPP or be readily available onsite.
- l. **Permit Part 5.1.2.3. Site map must provide, among other things, the following information:** a. Location and extent of significant structures and impervious surfaces.
- m. **Permit Part 6.1.7.1. Monitoring requirements in this permit begin in the first full quarter following the effective date of the permit or the permittee's date of discharge authorization, whichever comes later unless otherwise stated.**
- n. **Permit Part 8.U.7. If the benchmark is not achieved, then another round of BMPs must be implemented as provided in the general permit.**
- o. **Permit Appendix C.2.1. Applicable Benchmark Values.** The applicable benchmark values shall be the same numeric values as the instream Water Quality Standard for the pollutant(s) of concern. These benchmark values are intended to be guideline concentrations rather than numeric effluent limitations. The exceedance of a benchmark value is not a permit violation and does not in and of itself indicate a violation of instream Water Quality Standards. However, exceedance of a benchmark value may be used in conjunction with other information to demonstrate a violation of this permit or a violation of Water Quality Standard

11. As a result of the CSWEI, the EPA has determined that stormwater associated with industrial activity was discharged from the Facility within the meaning of Section 402(p) of the CWA, 33 U.S.C. § 1342(p), and its implementing regulations into Flat Creek. Flat Creek is

an impaired waterbody for fecal coliform and is the headwaters of Lake Lanier, a traditionally navigable water of the United States and a source of drinking water for much of metro Atlanta.

12. Based on the CSWEI, the NOV, and review of additional information, the EPA alleges that the Respondent has failed to comply with the CWA, its implementing regulations, and the Permit as follows

- a. Spraying live chickens with water; the water dripped off the birds, their cages, and the trucks resulting in a water sheet flowing towards stormwater inlets. This contaminated rinse water from the covered Live Holding Shed Containment Zone entered the parking lot, constituting unauthorized discharges in violation of Section 301 of the CWA 33 U.S.C. § 1311(a).
- b. Allowing blood from redwater trailers to be released on the ground and to flow away from the designated inlet structure, and storing materials uncovered outside in violation of Part 2.1.2.1 of the Permit
- c. Leaving feathers on ground near pretreatment and Live Holding Shed Containment Zone, feathers were noted behind wastewater pre-treatment sampling point, feathers were on ground outside covered holding area, and feathers and water were noted on the ground inside of and outside of Live Receiving Area. Cooling fans moved feathers and debris outside of containment zones, creating a potential for contaminating stormwater in violation of Part 2.1.2.2 of the Permit.
- d. Exceeding applicable TSS and/or fecal coliform benchmarks annually since at least 2008. Respondent has failed to review and determine if modifications were necessary for fecal coliform and TSS control measures when these benchmarks were exceeded in violation of Part 3.2 of the Permit.
- e. Respondent failed to properly document benchmark exceedance events and failed to document what if any corrective action was taken in violation of Parts 3.3 and 3.4.1. of the Permit.
- f. Failing to document corrective actions in the SWPPP or in an annual report in violation of Part 3.4.1.2 of the Permit.
- g. The logs the facility kept documenting the routine facility inspections, reviewed by the EPA, did not confirm that a member of the stormwater pollution prevention team participated in these inspections in violation of Part 4.1.1 of the Permit.
- h. The log documenting the visual assessment on samples collected does not document the time rain began or the time discharge began, therefore, it is impossible to determine based on the records whether the stormwater sample time was within the first 30 minutes of discharge. Nor is there any explanation of why

it was not possible to take sample within the first 30 minutes in violation of Part 4.2.1.2 of the Permit.

- i. There were no rosters or certificates of completion documenting that employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of the permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team were trained in violation of Part 5.1.1.2 of the Permit.
- j. Site map does not include the area across the street from the Facility that is being used by the Facility in violation of Part 5.1.2.3.a of the Permit.
- k. Monitoring for the new Permit was supposed to begin July 1, 2012. Respondent failed to collect an adequate number of samples to assess whether the fecal coliform benchmark was met for the geometric mean in May 2012-October 2012, November 2012-April 2013, May 2013-October 2013, and November 2013-December 2013 in violation of Part 6.1.7.1 of the Permit.
- l. Respondent failed to document that additional rounds of BMPs to address fecal coliform were being implemented each time a benchmark was exceeded in violation of Part 8.U.7 of the Permit.
- m. Respondent has not met benchmark values for fecal coliform (FC), the pollutant of concern in the receiving water, or TSS (a surrogate for fecal coliform) since 2008. Evaluation of fecal coliform/TSS did not occur on a regular basis. Outfall 001 failed to meet the fecal benchmark 5 of the 6 times it was sampled in 2013. There is no documentation of actions taken to address these exceedances. These continuing exceedances of the pollutant of concern without taking actions to address the problem is in violation of Part C.2.1 of the Permit.

13. Therefore, the EPA alleges that the Respondent has violated Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p), by failing to comply with the GAEPD Permit and for discharges not authorized by the Permit.

14. In November of 2015, the EPA and the Respondent finalized an Administrative Order on Consent, Docket No. CWA 04-2016-4752, pursuant to Section 309(a) of the CWA, 33 U.S., whereby the Respondent agreed to perform certain injunctive relief to address the above alleged violations.

### **III. Stipulations and Findings**

15. Complainant and the 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 (“CA/FO”) will simultaneously commence and conclude this matter.

16. For the purposes of this CA/FO, the Respondent admits the jurisdictional allegations set out above and neither admits nor denies the factual allegations set out above.

17. The Respondent hereby waives its right to contest the allegations set out above and its right to appeal the Final Order accompanying this Consent Agreement.

18. The Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CA/FO and consents to the other conditions set forth in this CA/FO.

19. By signing this CA/FO, the Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response and statement. The Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and/or imprisonment for knowing submission of such information.

20. The EPA reserves the right to assess and collect any and all civil penalties for any violation described herein and in the Administrative Order on Consent to the extent that any information or certification provided by the Respondent was materially false or inaccurate at the time such information or certification was provided to the EPA.

21. Complainant and the Respondent agree to settle this matter by their execution of this CA/FO. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of the CWA.

### **IV. Payment**

22. Pursuant to Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), and 40 C.F.R. Part 19, and considering the nature of the violations and other relevant factors, the EPA has determined that sixty-five thousand eight hundred fifty dollars (\$65,850.00) is an appropriate civil penalty to settle this action.

23. The Respondent shall submit payment of the penalty specified in the preceding paragraph within thirty (30) days of the effective date of this CA/FO via a cashier’s or certified check, payable to the order of “Treasurer, United States of America.” The check shall reference



on its face the name of the Respondent and the Docket Number of this CA/FO. Such payment shall be tendered to:

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

24. At the time of payment, the Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CA/FO, to the following persons at the following addresses:

Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960

and

Mary Mattox  
U.S. Environmental Protection Agency, Region 4  
Water Protection Division  
NPDES Permitting and Enforcement Branch  
Municipal and Industrial Enforcement Section  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960

25. The penalty amount specified above shall represent civil penalties assessed by the EPA and shall not be deductible for purposes of federal taxes.

26. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), failure by the Respondent to pay the penalty assessed by the CA/FO in full by its due date may subject the Respondent to a civil action to collect the assessed penalty plus interest (at currently prevailing rates from the effective date of this CA/FO), attorney's fees, costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to twenty percent (20%) of the aggregate amount of such penalty and nonpayment penalty which are unpaid as of the beginning of such quarter. In any such collection action, the validity, amount and appropriateness of the penalty and of this CA/FO shall not be subject to review.

## **V. General Provisions**

27. This CA/FO shall not relieve the Respondent of its obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state or local permit. Other than as expressed herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

28. Issuance of this CA/FO shall not be deemed as prohibiting, altering, or in any way limiting the ability of the EPA to pursue any other enforcement actions available to it under law. Such actions may include, without limitation, any administrative, civil, or criminal action to seek penalties, fines, injunctive, or other appropriate relief, or to initiate an action for imminent and substantial endangerment, under the CWA or any other federal or state statute, regulation, or permit.

29. Except as otherwise set forth herein, this CA/FO constitutes a settlement by Complainant and the Respondent of all claims for civil penalties pursuant to the CWA with respect to only those violations alleged in this CA/FO. Except as otherwise set forth herein, compliance with this CA/FO shall resolve the allegations of violations contained herein.

30. Nothing in this CA/FO is intended to nor shall be construed to operate in any way to resolve any criminal liability of the Respondent, or other liability resulting from violations that were not alleged in this CA/FO.

31. Each undersigned representative of the parties to this CA/FO certifies that he or she is fully authorized to enter into the terms and conditions of this CA/FO and to execute and legally bind that party to it.

32. This CA/FO applies to and is binding upon the Respondent and its officers, directors, employees, agents, successors and assigns.

33. Any change in the legal status of the Respondent, including but not limited to any transfer of assets of real or personal property, shall not alter the Respondent's responsibilities under this CA/FO.

34. Each party shall bear its own costs and attorney's fees in connection with the action resolved by this CA/FO.

35. In accordance with 40 C.F.R. § 22.5, the individuals below are authorized to receive service related to this proceeding:

**For Complainant:**

Wilda W. Cobb  
Associate Regional Counsel  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960

**For Respondent:**

Steven P. Case  
McGrath North  
First National Tower, Suite 3700  
1601 Dodge Street  
Omaha, NE 68102

36. The parties acknowledge and agree that this CA/FO is subject to the requirements of 40 C.F.R. § 22.45(c)(4), which provides a right to petition to set aside a Consent Agreement and proposed Final Order based on comments received during the public comment period.

37. Pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), and 40 C.F.R. § 22.38(b), Complainant represents that the State of Georgia was provided a prior opportunity to consult with Complainant regarding this matter.

38. Effective upon signature of this CA/FO by the Respondent, the Respondent agrees that the time period commencing on the date of its signature and ending on the date the EPA receives from the Respondent the payment required by this CA/FO shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by the EPA related to the matters addressed in this CA/FO and that, in any action brought by the EPA related to the matters addressed, the Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time during such period. If the EPA gives notice to the Respondent that it will not make this CA/FO effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by the EPA.


**VI. Effective Date**

39. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

DOCKET NO. CWA-04-2016-4501(b)

**AGREED AND CONSENTED TO:**

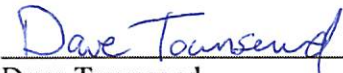
**For COMPLAINANT, U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 4:**

  
\_\_\_\_\_

James D. Giattina  
Director  
Water Protection Division

Date: 5/9/16

**For RESPONDENT, PILGRIM'S PRIDE CORPORATION:**

  
\_\_\_\_\_

Dave Townsend  
VP Environmental

Date: 3/21/16

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

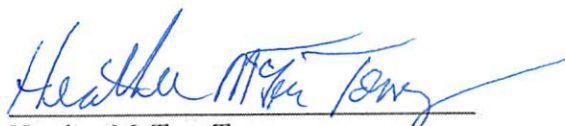
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949 Industrial Boulevard ) FINAL ORDER  
Gainesville, Hall County, Georgia )  
 )  
RESPONDENT. ) DOCKET NO. CWA-04-2016-4501(b)  
\_\_\_\_\_ )

FINAL ORDER

In accordance with the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, 40 C.F.R. Part 22, and authorities delegated to me, the foregoing Consent Agreement is hereby approved and incorporated by reference into this Final Order. Pursuant to Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), Respondent is hereby ordered to comply with the terms of the foregoing Consent Agreement.

U.S. ENVIRONMENTAL PROTECTION AGENCY

Date:     MAY 19 2016    

  
\_\_\_\_\_  
Heather McTeer Toney  
Regional Administrator

Docket No. CWA 04-2016-4501(b)

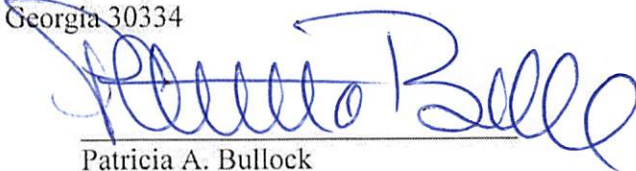
CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the attached CONSENT AGREEMENT AND FINAL ORDER in the matter of Pilgrim's Pride Corporation, Docket No. CWA-04-2016-4501(b) (filed with the Regional Hearing Clerk on 5-19, 2016) was served on 5-19, 2016, in the manner specified to each of the persons listed below.

By hand-delivery: Ms. Wilda Cobb  
Associate Regional Counsel  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960

By certified mail,  
return receipt requested: Mr. Dave Townsend  
VP Environmental  
Pilgrim's Pride Corporation  
949 Industrial Boulevard  
Gainesville, Georgia 30501

Mr. Bert Langley, Director of Compliance  
Georgia Environmental Protection Division  
2 Martin Luther King Jr. Drive  
Suite 1456 East, Floyd Tower  
Atlanta, Georgia 30334

  
Patricia A. Bullock  
Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960  
(404) 562-9511