



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

REG

SEP 30 2005

REPLY TO THE ATTENTION OF
05 (SEP 30) P5.00

BBW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5

Mr. Byron F. Taylor
Sidley Austin Brown & Wood, LLP
10 South Dearborn Street
Bank One Plaza
Chicago, Illinois 60603

Re: Citgo Petroleum Corporation Consent Agreement and Final Order

Dear Mr. Taylor:

Enclosed is a file stamped Consent Agreement and Final Order (CAFO) which resolves Citgo Petroleum Corporation (Citgo), CAA Docket No. CAA-05-2005 0064. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on

BBW
9/30/2005

Pursuant to paragraph 20 of the CAFO, Citgo Petroleum Corporation must pay the civil penalty within 30 days of 9/30/2005. Your check must display the case docket number, CAA-05-2005 0064, and the billing document number, 050305067.

BBW

Please direct any questions regarding this case to Mary McAuliffe, Associate Regional Counsel, at 312-886-6237

Sincerely yours,

Brent Marable

Brent Marable, Chief
Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure

cc: Julie Armitage, Acting Manager
Compliance and Enforcement Section
Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:) Docket No. CAA-05- 2005
)
CITGO Petroleum Corporation)
and PDV Midwest Refining L.L.C.,)
Lemont, Illinois,)
)
Respondents.)
_____)

0064
[Handwritten signature]

Consent Agreement and Final Order

Preliminary Statement

US EPA
PROTECTION AGENCY
REGION 5
SEP 30 15:40
REG 5

1. This is an administrative action commenced and concluded under Section 113(d) of the Clean Air Act (the Act), 42 U.S.C. § 7413(d), and Sections 22.1(a)(2), 22.13(b), and 22.18(b) of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (Consolidated Rules) as codified at 40 C.F.R. Part 22 (2004).

2. Complainant is the Director of the Air and Radiation Division, United States Environmental Protection Agency, Region 5 (U.S. EPA).

3. Respondents are CITGO Petroleum Corporation (CITGO) and PDV Midwest Refining L.L.C. (collectively, Respondents), corporations doing business in Lemont, Illinois.

4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative

action may be commenced and concluded simultaneously by the issuance of a Consent Agreement and Final Order (CAFO). 40 C.F.R. § 22.13(b) (2004).

5. The parties agree that settling these actions without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondents consent to entry of this CAFO and the assessment of the specified civil penalty, and agree to comply with the terms of the CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondents admit the jurisdictional allegations in this CAFO and neither admit nor deny the factual allegations in this CAFO.

8. Respondents waive their right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and their right to appeal this CAFO.

Statutory and Regulatory Background

9. On February 21, 1980, U.S. EPA approved 35 I.A.C. § 212.381, which governs certain visible emissions and particulate matter emissions, as part of the federally enforceable state implementation plan (SIP) for the State of Illinois. 45 Fed. Reg. 11472, February 21, 1980.

10. 35 I.A.C. § 212.381 requires that no owner or operator of a new or existing catalyst regenerator emit particulate matter exceeding the following rate in a one-hour period:

- a. If the catalyst recycle rate (P) is less than or equal to 30 tons per hour, the emission rate (E) shall not exceed $E = 4.10(P)^{0.67}$.
- b. If the catalyst recycle rate (P) is greater than 30 tons per hour, the emission rate (E) shall not exceed $E = (55.0(P)^{0.11}) - 40.0$.

11. CITGO's August 10, 2000 Revised Title V Clean Air Act Permit Program (CAAPP) Permit and Title I Permit also provide that the Fluidized Catalytic Cracking Unit (FCCU) at the Lemont refinery is subject to 35 I.A.C. § 212.381.

12. Under Section 113(d)(1) of the Act, 42 U.S.C. § 7413(d)(1), and 40 C.F.R. Part 19 (2004), the Administrator of U.S. EPA (the Administrator) may assess a civil penalty of up to \$32,500 per day of violation up to a total of \$270,000 for violations that occurred after March 15, 2004.

Factual Allegations

13. CITGO is a corporation that operates a petroleum refinery located at 135th Street and New Avenue in Lemont, Illinois (the Lemont refinery).

14. CITGO operates a FCCU at the Lemont refinery. The FCCU is equipped with a Catalyst Regenerator. Control equipment on the FCCU consists of a carbon monoxide (CO) Boiler and electrostatic precipitators (ESPs). Emissions from the FCCU/Catalyst Regenerator are typically routed through the CO Boiler and then the ESPs. In the event of a CO Boiler shutdown, emissions from the FCCU/Catalyst Regenerator are vented directly to the atmosphere.

15. Emissions from the FCCU/Catalyst Regenerator at the Lemont refinery are subject to 35 I.A.C. § 212.381.

Violations

16. From February 28, 2005 through March 9, 2005, CITGO shut down the CO Boiler on its FCCU for repair (CO Boiler shutdown). CITGO continued to operate the FCCU at a reduced rate and emissions from the FCCU were vented directly to the atmosphere.

17. During the CO Boiler shutdown, the charge rate to the FCCU was reduced from approximately 68,000 barrels/day to 48,000 barrels/day. During the shutdown, the catalyst recirculation rate was 43.5 tons/minute (2610 tons/hr). Based on the equation in 35 I.A.C. § 212.381, the allowable particulate emission rate from the FCCU during the CO Boiler shutdown was 90.68 lbs/hr.

18. Actual particulate emissions from the FCCU during the time period that the CO Boiler was shut down averaged 232 lbs/hr. This is a violation of 35 I.A.C. § 212.381 and Section 113(d) of the Act, 42 U.S.C. § 7413(d) and the Lemont refinery's permits.

Civil Penalty

19. Based on analysis of the factors specified in Section 113(e) of the Act, 42 U.S.C. § 7413(e), the facts of this case, and any other factors such as cooperation, prompt return to compliance, and agreement to perform a supplemental environmental project, U.S. EPA has determined that an appropriate civil penalty to settle this action is \$22,750.

20. CITGO must pay the \$22,750 civil penalty within 30 days after the effective date of this CAFO.

21. Payment must be made by Electronic Fund Transfer using the following information:

Name of Bank	Bank One, NA
Routing No.	021000021
Account No.	1113399
Beneficiary/Receiver	U.S. EPA - Region 5
Reference No.	BD No. or Docket No.

22. Within five days of making the Electronic Fund Transfer referenced in paragraph 21, above, CITGO must send a

letter stating CITGO's name, complete address, the case docket number, and the billing document number notifying U.S. EPA that such payment has been made. The letter must be sent to:

Attn: Regional Hearing Clerk, (E-19J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

Attn: Compliance Tracker, (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

Mary McAuliffe, (C-14J)
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

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

24. If CITGO does not timely pay the civil penalty, or any stipulated penalties due under paragraph 36, below, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States' enforcement expenses for the collection action under Section 113(d)(5) of the Act, 42 U.S.C. § 7413(d)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

25. Interest will accrue on any overdue amount from the date payment was due at a rate established under 31 U.S.C. § 3717. CITGO will pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. CITGO will pay a quarterly nonpayment penalty each quarter during which the assessed penalty is overdue according to Section 113(d)(5) of the Act, 42 U.S.C. § 7413(d)(5). This nonpayment penalty will be 10 percent of the aggregate amount of the outstanding penalties and nonpayment penalties accrued from the beginning of the quarter.

Supplemental Environmental Project

26. CITGO must arrange for the completion of a supplemental environmental project (SEP) to develop a portion of the I&M Canal Path as set forth in Exhibit A to this CAFO.

27. In the Village of Lemont, CITGO must complete the SEP as follows: Within two hundred and seventy days of the date of this CAFO, the Village of Lemont will construct a portion of the I&M Canal Path project as described in Exhibit A using funds provided by CITGO under this CAFO.

28. CITGO must spend at least \$80,000 for this SEP.

29. Respondents certify that they are not required to perform or develop the SEP by any law, regulation, grant, order, or agreement, or as injunctive relief as of the date it signs this CAFO. Respondents further certify that they have not received, and are not negotiating to receive, credit for the SEP in any other enforcement action.

30. If CITGO determines that for any reason the Village of Lemont will not, or cannot, implement the SEP contemplated by paragraphs 26 and 27 within the time frame provided under paragraph 27, CITGO shall provide, within 14 days of reaching such a determination, written notice of the determination to U.S. EPA, and either: (A) with prior written approval from U.S. EPA, implement within one year of the date of this CAFO an alternative SEP that is consistent with all applicable U.S. EPA policies regarding SEPs, which alternative SEP shall be subject to the provisions of this CAFO as though it were the original SEP set out in paragraphs 26 and 27, except as otherwise explicitly provided herein; or (B) in lieu of the SEP, pay within 30 days of the written notice a civil penalty of \$69,250 in addition to that set forth in paragraph 19. If CITGO elects to pay the additional civil penalty under this paragraph 30(B), paragraphs 31-40 shall no longer apply.

31. CITGO must submit a SEP completion report to U.S. EPA within 60 days of completion of the SEP. This report must contain the following information:

- a. detailed description of the SEP as completed;
- b. description of any operating problems and the actions taken to correct the problems;
- c. itemized costs of goods and services used to complete the SEP documented by copies of invoices, purchase orders, or cancelled checks that specifically identify and itemize the individual costs of the goods and services;
- d. certification that the SEP has been completed in compliance with this CAFO; and
- e. description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible).

32. CITGO must submit all notices and reports required by this CAFO by first class mail to:

Attn: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

33. In each report that CITGO submits as provided by this CAFO, it must certify that the report is true and complete by including the following statement signed by one of its officers:

I certify that I am familiar with the information in this document and that, based on my inquiry of

those individuals responsible for obtaining the information, the information is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

34. Following receipt of the SEP completion report described in paragraph 31 above, U.S. EPA must notify CITGO in writing that:

- a. It has satisfactorily completed the SEP and the SEP report;
- b. There are deficiencies in the SEP as completed or in the SEP report and U.S. EPA will give CITGO 30 days to correct the deficiencies; or
- c. It has not satisfactorily completed the SEP or the SEP report and U.S. EPA will seek stipulated penalties under paragraph 36.

35. If U.S. EPA exercises option b. above, CITGO may object in writing to the deficiency notice within 10 days of receiving the notice. The parties will have 30 days from U.S. EPA's receipt of CITGO's objection to reach an agreement. If the parties cannot reach an agreement, U.S. EPA will give CITGO

a written decision on its objection. CITGO will comply with any requirements that U.S. EPA imposes in its decision. If CITGO does not complete the SEP as required by U.S. EPA's decision, CITGO will pay stipulated penalties to the United States under paragraph 36 below.

36. If CITGO violates any requirement of this CAFO relating to the SEP, CITGO must pay stipulated penalties to the United States as follows:

a. If CITGO spent less on the SEP than the amount set forth in paragraph 28, above, Respondent must pay a stipulated penalty equal to the difference between the amount it spent on the SEP and the amount set forth in paragraph 28.

b. If CITGO has completed the SEP but the SEP is not satisfactory, Respondent must pay \$50,000 in addition to any penalty required under subparagraph a., above.

c. If CITGO fails to comply with the schedule in Exhibit A to this CAFO for implementing the SEP, fails to submit timely the SEP completion report required by paragraph 31, above, or fails to submit timely any other report required by paragraph 30, above, CITGO must pay stipulated penalties for each failure to meet an applicable milestone, as follows:

<u>Penalty per violation per day</u>	<u>Period of violation</u>
\$ 200	1 st through 14 th day
\$ 300	15 th through 30 th day
\$ 500	31 st day and beyond

These penalties will accrue from the date Respondent was required to meet each milestone until it achieves compliance with the milestone.

37. U.S. EPA's determinations of whether CITGO satisfactorily completed the SEP and whether it made good faith, timely efforts to complete the SEP will bind CITGO.

38. CITGO must pay any stipulated penalties within 15 days of receiving U.S. EPA's written demand for the penalties. CITGO will use the method of payment specified in paragraphs 20 through 25, above, and will pay interest, handling charges, and nonpayment penalties on any overdue amounts.

39. Any public statement that CITGO makes referring to the SEP must include the following language, "CITGO undertook this project under the settlement of the United States Environmental Protection Agency's enforcement action against CITGO for violations of the Clean Air Act."

40. If an event occurs which causes or may cause a delay in completing the SEP as required by this CAFO:

a. CITGO must notify U.S. EPA in writing within 10 days after learning of an event which caused or may cause a delay in completing the SEP. The notice must describe the anticipated length of the delay, its cause(s), CITGO's past and proposed actions to prevent or minimize the delay, and a schedule to carry out those actions. CITGO must take all reasonable actions to avoid or minimize any delay. If CITGO fails to notify U.S. EPA according to this paragraph, CITGO will not receive an extension of time to complete the SEP.

b. If the parties agree that circumstances beyond the control of CITGO caused or may cause a delay in completing the SEP, the parties will stipulate to an extension of time no longer than the period of delay.

c. If U.S. EPA does not agree that circumstances beyond the control of CITGO caused or may cause a delay in completing the SEP, U.S. EPA will notify CITGO in writing of its decision and any delays in completing the SEP will not be excused.

d. CITGO has the burden of proving that circumstances beyond its control caused or may cause a delay in completing the SEP. Increased costs for completing the SEP will not be a basis for an extension of time under subparagraph b., above. Delay in achieving an interim step will not necessarily justify or excuse delay in achieving subsequent steps.

Final Statement

41. This CAFO resolves only Respondents' liability for federal civil penalties for the violations alleged in the Violations section of this CAFO.

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

43. This CAFO does not affect Respondents' responsibility to comply with the Act and other applicable federal, state and local laws, and regulations. Except as provided in paragraph 41 above, compliance with this CAFO will not be a defense to any

actions subsequently commenced pursuant to federal laws and regulations administered by Complainant.

44. This CAFO constitutes an "enforcement response" as that term is used in "U.S. EPA's Clean Air Act Stationary Source Civil Penalty Policy" to determine Respondents' "full compliance history" under Section 113(e) of the Act, 42 U.S.C. § 7413(e).

45. The terms of this CAFO bind Respondents, and their successors, and assigns.

46. Each person signing this consent agreement certifies that he or she has the authority to sign this consent agreement for the party whom he or she represents and to bind that party to its terms.

47. Each party agrees to bear its own costs and attorneys' fees in this action.

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

CONSENT AGREEMENT AND FINAL ORDER
CITGO Petroleum Corporation and
PDV Midwest Refining L.L.C.

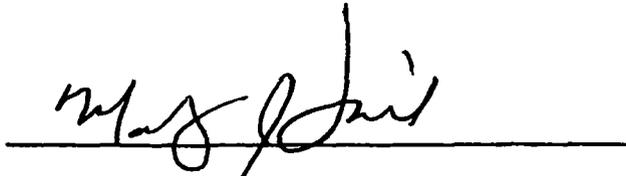
U.S. Environmental Protection Agency, Complainant



Date

Stephen Rothblatt, Director
Air and Radiation Division
U.S. Environmental Protection
Agency, Region 5 (A-18J)

CITGO Petroleum Corporation and
PDV Midwest Refining, L.L.C.



Date: September 30, 2005

Mark J. Smith
Vice President
CITGO Lemont Refinery

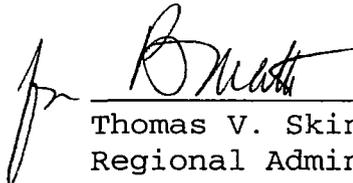
CAA-05- 2005 0064


**CONSENT AGREEMENT AND FINAL ORDER
CITGO Petroleum Corporation
and PDV Midwest Refining L.L.C.**

Final Order

It is ordered as agreed to by the parties and as stated in the consent agreement, effective immediately upon filing of this CAFO with the Regional Hearing Clerk. This final order disposes of this proceeding pursuant to 40 C.F.R. § 22.18.

9-30-05
Date



Thomas V. Skinner
Regional Administrator
U.S. Environmental Protection
Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3511

GAA-05- 2005 0064


US ENVIRONMENTAL PROTECTION AGENCY
REGION 5
05 SEP 30 05:00


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EXHIBIT A

Village of Lemont I&M Canal Extension Projects

I&M Canal Plan Objective(s): to develop the I&M Canal Path for recreational purposes, i.e., hiking, fishing, canoeing; to promote the interconnection of the path with existing community bike paths; provide historical information of the Path's usage throughout time; and to facilitate the architectural and engineering design of parks and features along the path and facilitate the restoration of the I&M Canal. The Plan will allow the Village to pursue grant monies to realize the development of Lemont's portion of Canal as intended by the creation of the National Corridor.

Main Goals for Pedestrian Plans along I&M Canal

- Create pedestrian and bicycle linkages to surrounding communities.
- Reduce pollution from vehicles by promoting walking and bicycling as viable modes of transportation
- Decrease vehicular congestion and the current strain on parking facilities in the downtown, at schools, and religious institutions
- Develop pedestrian and bicycle facilities south of the downtown

The Village currently maintains two trails; both located in the north half of Lemont. The first is the I&M Canal trail. This trail runs east west along the I&M Canal from the Heritage Quarries Recreation area to Ceco Road in Will County. Neither of these locations can currently be considered trailheads; no parking or signed entrances exist at either location. The primary entrance of the trail is off Stephen Street in the downtown, where public parking is available in several locations. Additional parking is proposed east of the downtown near the entrance to the Heritage Quarry recreation area. The trail is approximately 6 miles long and, in some sections, is both north and south of the canal. The I&M trail currently does not connect to any other trails or communities and therefore is considered a recreation trail only. The trail is ten feet in width and is a multi-use trail; it is constructed of limestone screenings. The trail's only signage consists of mile markers. Several shelters and parks exist and are planned for the trail corridor, including the Heritage Quarries Recreation Area and a dog park. The Village is also working with the Army Corps of Engineers to restore the Canal, potentially through dredging the waterway.

The second trail is within the Heritage Quarry Recreation Area directly northeast of the downtown. The Village recently acquired this property for primarily passive recreation and the master plan for the area includes several trails, primitive camping, and fishing. One large looping trail, over one mile in length, has already been completed and additional trails will be completed in the near future. It passes by several spring fed quarries, the working Chicago Sanitary and Ship Canal, and under a dense canopy of mature oak trees.

Main objectives regarding the two projects in question:

Current Path Length: Austeel Road (West End) to Quarry 1 (East End) - Estimated path length is 5 miles. Several portions of the path on the north and south side of the Canal east of KA Steel are in the process of being extended.

Objective 1: To extend the south side of our trail (between Austeel Rd and Ed Bossert)

The canal path has been completed on the North Side of Canal from Ed Bossert Drive to Ceco Steel Road. Plans include the installation of a loop back to town on the south side of the Canal from Ceco Steel Road to the approximate location of the I-355 cross-over. This proposed change is indicated on the map. Expanding the trail to create an approximately 10-mile loop will assist in achieving the main goals of the Pedestrian Plans outlined above, especially with the planned addition of pedestrian bridges linking the north and south trail segments. The canal is also an historic landmark; if restored, it could become an educational attraction.

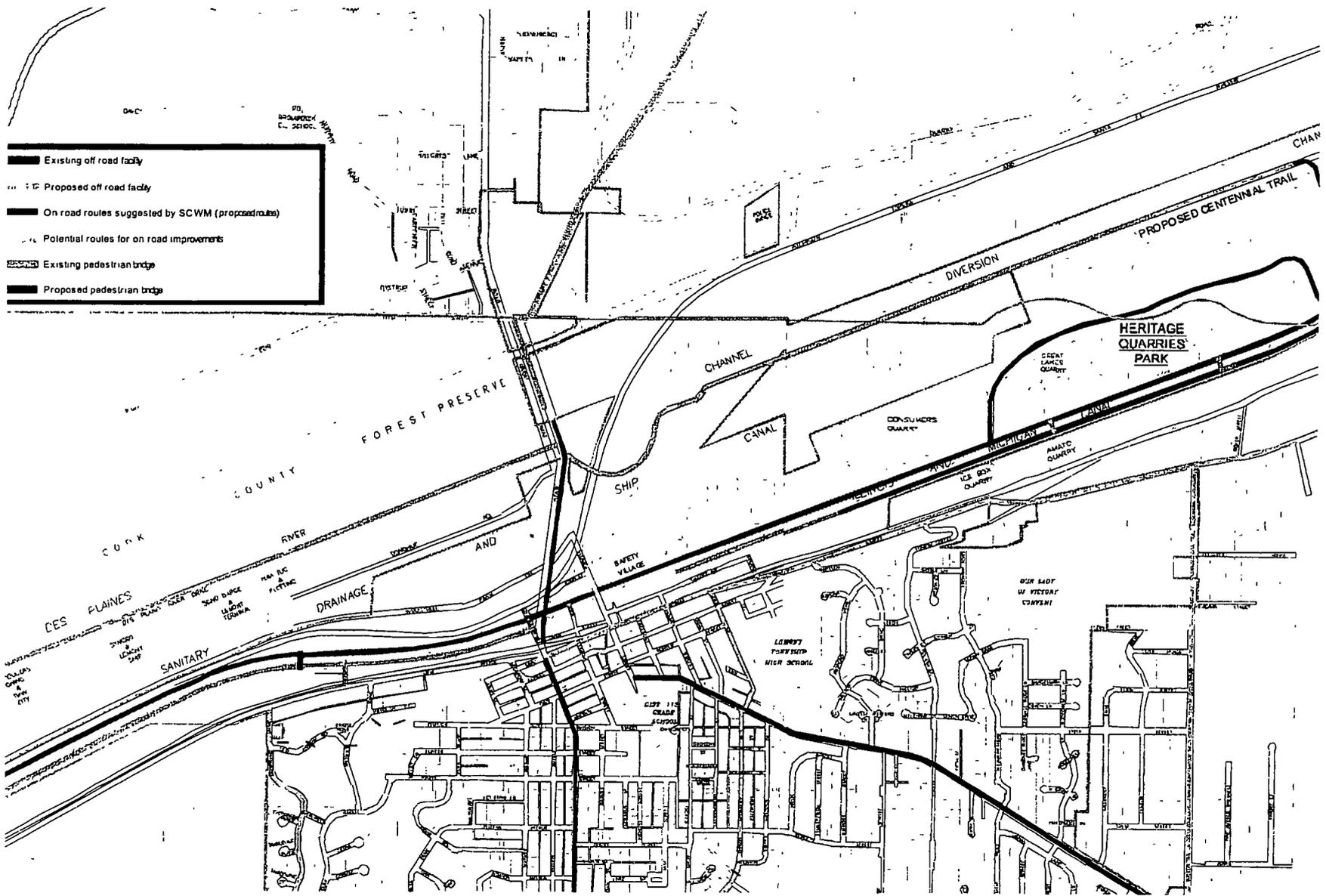
Objective 2: To extend/connect our trail to Lockport's trail to the west:

A 2003 I&M Canal Comprehensive Plan indicates a need to contact Illinois DNR (Department of Natural Resources), Will County, and initiate communication with Citgo Refinery.

Lemont's I&M Canal is currently only a recreational trail. It does not connect to any other trail system, preventing Lemont residents from exploring other communities on foot or by bicycle and conversely inhibiting residents from neighboring communities from doing the same. Connecting the I&M Canal to other communities will specifically require the following projects:

- Work with the IDNR to develop a trail extension along the I&M Canal west of Ceco Road in Will County (IDNR owned, Village maintained)
 - Work with Citgo, the Canadian National Illinois Central (CNIC) railroad, Village of Lockport, Village of Romeoville and other municipalities to obtain easements or dedications necessary to connect segments of the I&M Canal Trail
 - Work with IDNR to improve Ceco Road to include a pedestrian crossing
 - Use signage to direct users to important location such as restroom facilities, downtowns, and parking
 - Work with the Army Corps to dredge the I&M Canal and with IDNR unblock the frequently clogged culvert under Ceco Road and restore the I&M Canal wall where possible.

Again, extending our trail will assist in achieving the goals of the Pedestrian Plans outlined above.



- Existing off road facility
- Proposed off road facility
- On road routes suggested by SCWM (proposed routes)
- Potential routes for on road improvements
- Existing pedestrian bridge
- Proposed pedestrian bridge

RD, BRIDGE, SCHOOL, CHURCH

CORK RIVER
 SANITARY DRAINAGE
 DES PLAINES
 SHIP CANAL
 DIVERSION

FOREST PRESERVE

HERITAGE QUARRIES PARK

LEINERT TOWNSHIP HIGH SCHOOL

SHERBORN VILLAGE

PROPOSED CENTENNIAL TRAIL

WATER TOWER
 MILL
 DAM
 BRIDGE
 CHURCH
 SCHOOL
 BRIDGE
 CHURCH
 SCHOOL

ST. JOSEPH'S CHURCH

CONSUMERS QUARTY

AMATEUR QUARTY

U.S. BOX QUARTY

WATER TOWER
 MILL
 DAM
 BRIDGE
 CHURCH
 SCHOOL
 BRIDGE
 CHURCH
 SCHOOL

In the Matter of Citgo Petroleum Corporation, Chicago, Illinois
Docket No:

CERTIFICATE OF SERVICE

I, Betty Williams, certify that I hand delivered the original of the Consent Agreement and Final Order, docket number CAA-05-2005-0064 to the Regional Hearing Clerk, Region 5, United States Environmental Protection Agency, and that I mailed correct copies by first-class, postage prepaid, certified mail, return receipt requested, to Citgo Petroleum Corporation's Counsel by placing them in the custody of the United States Postal Service addressed as follows:

Mr. Byron F. Taylor
Sidley Austin Brown & Wood, LLP
10 South Dearborn Street
Bank One Plaza
Chicago, Illinois 60603

I also certify that a copy of the CAFO was sent by
First Class Mail to:

Julie Armitage, Acting Manager
Compliance and Enforcement Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

on the 3rd day of October, 2005.


Betty Williams, APA
AECAS (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010320000589097766

In the Matter of Citgo Petroleum Corporation, Chicago, Illinois
Docket No: CAA-05-2005-0064

CERTIFICATE OF SERVICE

I, Betty Williams, certify that I hand delivered the original of the Consent Agreement and Final Order, docket number CAA-05-2005-0064 to the Regional Hearing Clerk, Region 5, United States Environmental Protection Agency, and that I mailed correct copies by first-class, postage prepaid, certified mail, return receipt requested, to Citgo Petroleum Corporation's Counsel by placing them in the custody of the United States Postal Service addressed as follows:

Mr. Byron F. Taylor
Sidley Austin Brown & Wood, LLP
10 South Dearborn Street
Bank One Plaza
Chicago, Illinois 60603

I also certify that a copy of the CAFO was sent by First Class Mail to:

Julie Armitage, Acting Manager
Compliance and Enforcement Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

on the 4th day of October, 2005.


Betty Williams, APA
AECAS (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010320000589097166