



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

SEP 13 2012

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Ki Harmon  
Manager of Health, Safety, and Environmental  
Indiana Harbor Coke Company  
3210 Watling Street  
East Chicago, Indiana 46312

Delauna Pack  
SunCoke Energy, Incorporated  
1011 Warrenville Rd., Ste 600  
Lisle, IL 60532

Re: Notice and Finding of Violation at Indiana Harbor Coke Company, East Chicago,  
Indiana

Dear Mr. Harmon and Ms. Pack:

The U.S. Environmental Protection Agency has determined that Indiana Harbor Coke Company's (IHCC) facility at 3210 Watling Street, East Chicago, Indiana, is in violation of the Clean Air Act (Act) and the Indiana State Implementation Plan (SIP). This Notice and Finding of Violation (NOV/FOV) is issued in accordance with Section 113(a) of the Act, 42 U.S.C. § 7413(a). A list of the requirements violated is provided below.

IHCC's Title V permit contains operational limitations and emissions limits for, among other things, particulate matter (PM), particulate matter 10 (PM10), and sulfur dioxide (SO<sub>2</sub>). The purpose of these emissions limits is to help protect the public from unhealthy exposures to criteria pollutants, emissions of which contribute to respiratory problems, lung damage and premature deaths.

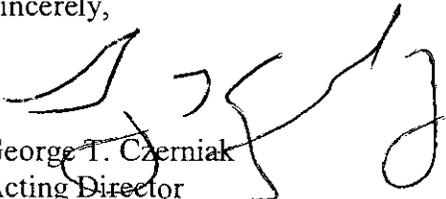
Based on data submitted to EPA on February 20, 2012, IHCC has violated and continues to violate provisions in its permit that govern recordkeeping standards and bypass venting from its coke batteries. Violation of these requirements is also a violation of the Indiana SIP, as well as Title V of the Act and the regulations at 40 C.F.R. Part 70, which require compliance with the terms and conditions of Title V permits.

Section 113 of the Act gives us several enforcement options. These options include: issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action, and bringing a judicial criminal action.

Section 113 of the Act provides you with the opportunity to request a conference with us about the violations alleged in the NOV/FOV. A conference should be requested within 10 days following receipt of this notice and any conference should be held within 30 days following receipt of this notice. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent you at this conference.

EPA's contacts in this matter are Gina Harrison and Constantinos Loukeris. You may call Ms. Harrison at (312) 353-6956 or Mr. Loukeris at (312) 353-6198 if you wish to request a conference. EPA hopes that this NOV/FOV will encourage IHCC's compliance with the requirements of the Act.

Sincerely,



George T. Czerniak  
Acting Director  
Air and Radiation Division

Enclosure

cc: Michael Hall, Northwest Regional Office

**United States Environmental Protection Agency  
Region 5**

**IN THE MATTER OF:**

Indiana Harbor Coke Company and  
SunCoke Energy, Inc.

Proceedings Pursuant to  
the Clean Air Act,  
42 U.S.C. §§ 7401 *et seq.*

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( **NOTICE and**  
( **FINDING OF VIOLATION**  
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( **EPA-5-12-IN-07**  
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**NOTICE AND FINDING OF VIOLATION**

The U.S. Environmental Protection Agency is issuing this Notice and Finding of Violation (NOV/FOV) to Indiana Harbor Coke Company (IHCC) and SunCoke Energy, Inc. for violations of the Clean Air Act (Act), 42 U.S.C. §§ 7401 *et seq.*, and the Indiana State Implementation Plan (SIP) at the IHCC plant in East Chicago, Indiana.

This NOV/FOV is issued pursuant to Section 113(a)(1) and (a)(3) of the Act, 42 U.S.C. § 7413(a)(1) and (3). The authority to issue this NOV/FOV has been delegated to the Regional Administrator of EPA, Region 5, and redelegated to the Director, Air and Radiation Division.

**STATUTORY AND REGULATORY BACKGROUND**

**Indiana State Implementation Plan**

1. Section 110 of the Act, 42 U.S.C. § 7410, requires states to adopt, and submit to EPA for approval, SIPs providing for the implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS) promulgated by EPA pursuant to Section 109 of the Act, 42 U.S.C. § 7409. EPA has promulgated NAAQS for, among other pollutants, particulate matter (PM) and sulfur dioxide (SO<sub>2</sub>).
2. Pursuant to 40 C.F.R. § 52.23, failure to comply with any approved regulatory provision of a SIP, or with any permit condition issued pursuant to approved or promulgated regulations for the review of new or modified stationary or indirect sources, renders the person so

for the review of new or modified stationary or indirect sources, renders the person so failing to comply in violation of a requirement of an applicable implementation plan and subject to enforcement under Section 113 of the Act, 42 U.S.C. § 7413.

3. On May 3, 1990, the Administrator of EPA approved 326 IAC Rule 1-6 as part of the federally enforceable SIP for the State of Indiana. 55 Fed. Reg. 18604. 326 IAC 1-6 regulates general provisions, including but not limited to malfunctions at stationary sources, scheduled maintenance, and reporting.
4. On November 14, 1995, the Administrator of EPA gave final interim approval to 326 IAC Rule 2-7 "as helping to satisfy Title V penalty requirements" for the State of Indiana. 60 Fed. Reg. 57188. 326 IAC 2-7-16(d) states that "this emergency provision supersedes any emergency or upset provision contained in 326 IAC 1-6 for sources subject to this rule after the effective date of this rule."
5. On September 26, 2005, the Administrator of EPA approved 326 IAC Rule 7-4 as part of the federally enforceable SIP for the State of Indiana. 70 Fed. Reg. 56129. 326 IAC 7-4.1-8(b) sets forth the requirement for IHCC that a maximum of 19% of coke oven waste gases leaving the common tunnel shall be allowed to be vented to atmosphere on a 24-hour basis and 14% on an annual basis. 326 IAC 7-4.1-8.

#### **Title V Requirements**

6. Section 502(d)(1) of the Act, 42 U.S.C. § 7661a(d)(1), requires each state to develop and submit to EPA an operating permit program which meets the requirements of Title V. On December 4, 2001, EPA granted Indiana final approval of its Title V Clean Air Act Permit Program, effective November 30, 2001.
7. Section 502(b) of the Act, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate except in compliance with a Title V permit.
8. 40 C.F.R. § 70.3 provides that the requirements of Part 70 apply to any major source located in a state that has received whole or partial approval of its Title V program.
9. Indiana Department of Environmental Management (IDEM), delegated authority by EPA, issued to IHCC Construction Permit 089-9236-00382 on February 26, 1998, modified Construction Permit 089-14241-00382 (Construction Permit) on November 30, 2001, and Title V Operating Permit T089-11311-00382 (Title V Permit) on September 22, 2006. The Title V Permit incorporates all limits and operational constraints set forth in the Construction Permit.

10. Part D.1.11(b) of the Title V Permit limits bypass venting to 19% of total waste gas from the common tunnel, per 24-hour period.
11. Part D.1.11(b) of the Title V Permit limits annual bypass venting to 14% of total waste gas from the common tunnel on an annual basis.

**National Emission Standards for Hazardous Air Pollutants (NESHAP)**  
**Requirements**

12. Section 112(d) of the Act, 42 U.S.C. § 7412(d), authorizes EPA to promulgate regulations establishing emission standards for particular industrial sources that emit one or more of the Hazardous Air Pollutants (HAPs) listed in Section 112(b) of the Act in significant quantities.
13. On April 14, 2003, EPA promulgated the NESHAP for Coke Ovens: Pushing, Quenching, and Battery Stacks at 40 C.F.R. Part 63, Subpart CCCCC. Subpart CCCCC applies to owners or operators of a coke oven battery at a coke plant that is (or is part of) a major source of HAP emissions. A major source of HAP is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. 40 C.F.R. § 63.7282.
14. 40 C.F.R. Part 63, Subpart CCCCC, defines an affected source as a new or existing coke oven battery constructed on or before July 3, 2001.
15. 40 C.F.R. § 63.7300(a) states, "as required by § 63.6(e)(1)(i), you must always operate and maintain your affected source, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by this subpart."
16. 40 C.F.R. § 63.6(e)(1)(i) requires that at all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

**FACTUAL BACKGROUND**

17. IHCC owns and/or operates a heat recovery metallurgical coke plant at 3210 Watling Street, East Chicago, Indiana (facility).
18. The facility is classified as a major stationary source as that term is defined at 40 C.F.R. § 51.166(i)(4)(ii), and an existing coke oven battery as that term is defined at 40 C.F.R. § 63.7282.
19. IHCC constructed its coke oven battery in 1988.

20. On February 14, 2012, EPA requested that IHCC provide, among other things, data detailing total bypass venting since 2009.
21. IHCC responded to the information request on February 20, 2012 and reported 12, 201, and 224 days of venting over the 19% 24-hour limit, respectively, in 2009, 2010, and 2011, since October 1, 2009<sup>1</sup>. See Table A.
22. In its February 20, 2012 response, IHCC also reported exceeding the 14% annual venting limit in 2010 and 2011, citing 19% and 21% plantwide annual venting, respectively. See Table B.

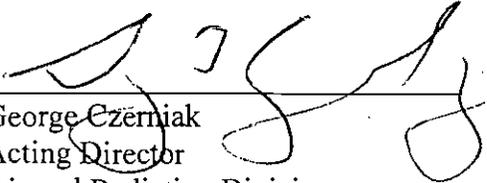
### **VIOLATIONS OF EMISSIONS LIMITS AND OPERATING STANDARDS**

23. IHCC's bypass venting at its 16 bypass vent stacks in excess of its 19% 24-hour limit since October 1, 2009 violates the operational standards of its Title V Permit, Section 502(a) of the Act, 42 U.S.C. § 7661a(a), 40 C.F.R. § 70.7(b), the Indiana SIP at 326 IAC 7-4.1-8., and 40 C.F.R. §§ 63.6(e)(1)(i), and 63.7300(a).
24. IHCC's bypass venting at its 16 bypass vent stacks in excess of its 14% annual limit in 2010 and 2011 violate its Title V Permit, Section 502(a) of the Act, 42 U.S.C. § 7661a(a), 40 C.F.R. § 70.7(b), the Indiana SIP at 326 IAC 7-4.1-8., and 40 C.F.R. §§ 63.6(e)(1)(i), and 63.7300(a).
25. IHCC's bypass venting at its 16 bypass vent stacks in excess of the 24-hour and annual emissions limits constitutes a violation of the "good air pollution control practices for minimizing emissions" as required by 40 C.F.R. §§ 63.7300(a) and 63.6(e)(1)(i).

### **ENVIRONMENTAL IMPACT OF VIOLATIONS**

26. Excess coke oven emissions increase the amount of acid rain and public exposure to unhealthy particulate matter. Particulate matter, especially fine particulate, contributes to respiratory problems, lung damage and premature deaths.

2/13/12  
Date

  
George Czerniak  
Acting Director  
Air and Radiation Division

<sup>1</sup> Totals include an added average plantwide venting rate of 5.2%, as explained in IHCC's report titled "Engineering and Technology Study -- IHO Emergency Stack -- RESULTS -- FINAL compress.pdf" dated January 6, 2012.

Air and Radiation Division

Table A: Total days of excess bypass venting recorded at Indiana Harbor Coke since October 1, 2009.

Daily Venting	
	Total Daily Venting Exceeding 24-hour Venting Limit of 19%
10/1/2009	21.84
10/3/2009	20.01
10/4/2009	20.31
10/5/2009	20.32
10/6/2009	25.77
10/7/2009	21.24
10/9/2009	20.5
10/10/2009	20.74
10/11/2009	21.15
10/12/2009	20.44
10/13/2009	19.5
12/12/2009	19.17

Daily Venting	
	Total Daily Venting Exceeding 24-hour Venting Limit of 19%
2/10/2010	23.08
2/11/2010	21.56
2/12/2010	21.32
2/13/2010	21.8
2/14/2010	22.6
2/15/2010	21.28
2/16/2010	20.58
2/17/2010	21.22

2/18/2010	19.7
2/19/2010	19.14
2/24/2010	21.9
2/25/2010	21.14
2/26/2010	21.85
2/27/2010	21.76
2/28/2010	22.83
3/1/2010	20.81
3/2/2010	22.76
3/3/2010	21.95
3/4/2010	20.52
3/6/2010	19.28
3/8/2010	19.78
3/9/2010	23.65
3/10/2010	20.96
3/11/2010	22.1
3/12/2010	23.38
3/13/2010	19.62
3/15/2010	21.08
3/16/2010	22.92
3/17/2010	20.3
3/18/2010	22.5
3/19/2010	19.89
3/20/2010	23.33
3/21/2010	20.45
3/22/2010	23.85
3/23/2010	23.35
3/24/2010	21.4
3/25/2010	25.52
3/26/2010	20.69
3/28/2010	19.21
3/29/2010	24.91
3/30/2010	22.89
4/1/2010	23.02
4/2/2010	23.87
4/3/2010	26.54
4/4/2010	20.99
4/5/2010	23.23

4/6/2010	19.3
4/7/2010	19.43
4/8/2010	22.73
4/9/2010	25.49
4/10/2010	20.57
4/13/2010	19.28
4/14/2010	21.25
4/15/2010	23.02
4/16/2010	22.22
4/20/2010	22.46
4/21/2010	22.35
4/22/2010	19.04
4/24/2010	19.09
4/26/2010	23.46
4/27/2010	22.68
4/28/2010	19.79
5/1/2010	21.68
5/3/2010	19.53
5/5/2010	19.32
5/6/2010	22.75
5/7/2010	23.6
5/8/2010	26.98
5/9/2010	23.08
5/10/2010	19.4
5/12/2010	20.54
5/14/2010	19.04
5/18/2010	19.13
5/21/2010	21.48
5/22/2010	19.91
6/9/2010	20.25
6/10/2010	21.71
6/13/2010	19.42
6/17/2010	21.33
6/18/2010	23.37
6/19/2010	26.9
6/20/2010	24.91
6/21/2010	19.55
6/24/2010	21

6/25/2010	19.75
7/11/2010	22.14
7/12/2010	22.63
7/13/2010	22.94
7/14/2010	20.83
7/15/2010	27.84
7/16/2010	26.95
7/17/2010	23.73
7/18/2010	19.28
7/24/2010	24.93
7/25/2010	21.56
7/26/2010	20.95
7/27/2010	22.97
7/28/2010	25.35
7/29/2010	25.03
7/30/2010	23.36
7/31/2010	22.24
8/1/2010	23.78
8/2/2010	22.21
8/4/2010	19.24
8/8/2010	19.36
8/9/2010	26.79
8/10/2010	25.1
8/11/2010	19.02
8/12/2010	20.13
8/14/2010	21.2
8/15/2010	21.03
8/16/2010	22.13
8/17/2010	20.28
8/18/2010	20.18
8/19/2010	23.59
8/20/2010	23.78
8/21/2010	29.12
8/22/2010	24.37
8/23/2010	22.34
8/24/2010	22.01
8/25/2010	19.87
8/26/2010	21.49

8/27/2010	19.91
8/30/2010	20.39
8/31/2010	21.33
9/2/2010	20.17
9/3/2010	21.83
9/4/2010	20.27
9/5/2010	19.46
9/6/2010	20.86
9/7/2010	20.93
9/8/2010	22.42
9/9/2010	22.4
9/10/2010	21.6
9/11/2010	19.57
9/12/2010	20.34
9/13/2010	21.43
9/14/2010	23.67
9/16/2010	22.47
9/17/2010	23.21
9/18/2010	25.33
9/19/2010	19.79
9/20/2010	19.21
9/21/2010	21.71
9/28/2010	26.38
9/29/2010	24.7
10/7/2010	19.77
10/8/2010	20.15
10/11/2010	19.16
10/12/2010	21.44
10/13/2010	21.9
10/14/2010	21.98
10/15/2010	22.08
10/18/2010	22.63
10/19/2010	27.6
10/20/2010	25.28
10/21/2010	20.95
10/22/2010	21.04
10/23/2010	20.55
10/25/2010	19.05

10/26/2010	22.48
10/27/2010	23.92
10/28/2010	22.53
11/1/2010	20.79
11/4/2010	24.5
11/5/2010	31.78
11/6/2010	24.84
11/7/2010	25.16
11/8/2010	24.78
11/9/2010	25.2
11/10/2010	21.69
11/11/2010	19.8
11/12/2010	24.01
11/13/2010	20.48
11/19/2010	19.28
11/20/2010	21.9
11/21/2010	23.45
11/22/2010	20.56
11/23/2010	26.95
11/24/2010	26.72
11/25/2010	25.02
11/26/2010	21.42
11/27/2010	21.86
11/28/2010	21.5
11/29/2010	22.21
11/30/2010	22.81
12/1/2010	22
12/9/2010	19.2
12/11/2010	19.58
12/12/2010	26.16
12/13/2010	21.65
12/14/2010	20.5
12/15/2010	21.62
12/16/2010	21.78
12/17/2010	21.29
12/18/2010	21.46
12/19/2010	20.51
12/20/2010	21.64

12/21/2010	22.52
12/22/2010	24.51
12/23/2010	23.61

Daily Venting	
	Total Daily Venting Exceeding 24-hour Venting Limit of 19%
1/1/2011	20.79
1/4/2011	20.05
1/6/2011	25.17
1/7/2011	25.21
1/8/2011	25.94
1/11/2011	22.57
1/12/2011	24.91
1/13/2011	24.17
1/14/2011	25.7
1/15/2011	26.13
1/16/2011	22.87
1/17/2011	22.87
1/18/2011	25.56
1/19/2011	23.96
1/20/2011	25.93
1/21/2011	27.28
1/22/2011	27.02
1/23/2011	29.47
1/24/2011	29.86
1/25/2011	30.3
1/26/2011	31.88
1/27/2011	33.63
1/28/2011	26.91
1/29/2011	23.06
1/30/2011	26.81
1/31/2011	26.73
2/1/2011	30.93
2/2/2011	34.75

2/3/2011	33.5
2/4/2011	20.54
2/7/2011	20.15
2/8/2011	20.98
2/9/2011	20.9
2/10/2011	19.3
2/12/2011	20.68
2/13/2011	25.03
2/14/2011	25.51
2/15/2011	25.29
2/16/2011	24.92
2/17/2011	24.42
2/18/2011	28.61
2/19/2011	30.8
2/20/2011	26.56
2/21/2011	32.97
2/22/2011	32.82
2/23/2011	29.93
2/24/2011	32.81
2/25/2011	31.37
2/26/2011	25.93
2/27/2011	27.1
2/28/2011	33.71
3/1/2011	27.83
3/2/2011	26.44
3/3/2011	21.13
3/5/2011	22.52
3/6/2011	20.28
3/8/2011	21.28
3/9/2011	21.08
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3/11/2011	20.11
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4/5/2011	22.26
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5/10/2011	22.05
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5/12/2011	23.27
5/13/2011	19.68
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5/15/2011	21.48
5/16/2011	20.59
5/26/2011	19.06
6/9/2011	19.3
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6/15/2011	20.48
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6/24/2011	20.83
6/25/2011	25.57
6/26/2011	25.47
6/27/2011	27.46
6/28/2011	25.46
6/29/2011	19.8

7/5/2011	20.7
7/6/2011	21.97
7/8/2011	20.86
7/17/2011	21.01
7/18/2011	22.23
7/19/2011	26.01
7/20/2011	22.59
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12/13/2011	20.97
12/14/2011	20.38
12/15/2011	24.38
12/16/2011	25.12
12/17/2011	24.17

12/19/2011	22.16
12/20/2011	23
12/21/2011	22.49
12/22/2011	19.73
12/27/2011	19.31
12/28/2011	19.67

Table B: Annual bypass venting recorded at Indiana Harbor Coke, 2010 and 2011.

Annual Venting	
	Total Venting Exceeding 14 % Annual Venting Limit
2010	19.0
2011	21.4

**CERTIFICATE OF MAILING**

I, Loretta Shaffer, certify that I sent a Notice and Finding of Violation, No. EPA-5-12-IN-07, by Certified Mail, Return Receipt Requested, to:

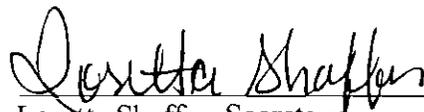
Delauna Pack  
SunCoke Energy, Incorporated  
1011 Warrenville Rd., Ste 600  
Lisle, Illinois 60532

Ki Harmon  
Manager of Health, Safety, and Environmental  
Indiana Harbor Coke Company  
3210 Watling Street  
East Chicago, Indiana 46312

I also certify that I sent copies of the Notice of Violation and Finding of Violation by first class mail to:

Michael Hall  
Northwest Regional Office  
Indiana Department of Environmental Management  
8380 Louisiana Street  
Merrillville, Indiana 46410-9201

on the 14 day of Sept, 2012.



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Loretta Shaffer, Secretary  
AECAB, MN-OH

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7667 6199