



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

DEC 23 2014

REPLY TO THE ATTENTION OF:

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

Ronald Coupar  
Environmental Manager  
Behr Iron and Metal  
1100 Seminary Street  
Rockford, Illinois 61104

Re: Administrative Order EPA-5-15-113(a)-COE-1 for Behr Iron and Metal

Dear Mr. Coupar,

Enclosed is an executed original of the Administrative Consent Order for the above-referenced case. If you have any questions about the Order, please contact me at (312) 886-6797.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sarah Marshall".

Sarah Marshall, Chief  
Air Enforcement and Compliance Assurance Section (MI/WI)

Enclosure

cc: Eric Jones, IEPA  
Bill Bauman, Wisconsin Department of Natural Resources  
Brian Hutchins, Iowa Department of Natural Resources  
Mark Smith, EPA Region 7  
Louise Gross, C-14J  
Gregory Gehrig, AE-17J  
Eleanor Kane, AE-17J

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

<b>In the Matter of:</b>	)	<b>EPA-5-15-113(a)-COE-1</b>
	)	
<b>Behr Iron and Metal</b>	)	<b>Proceeding Under Sections</b>
<b>Rockford, Illinois</b>	)	<b>113(a)(3) and 114(a)(1) of the Clean Air Act,</b>
	)	<b>42 U.S.C. §§ 7413(a)(3) and 7414(a)(1)</b>
_____	)	

**Administrative Consent Order**

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency, Region 5 (EPA), is entering into this Administrative Consent Order (Order) with Behr Iron and Metal (Behr), headquartered at 1100 Seminary Street, Rockford, Illinois, under Sections 113(a)(3) and 114(a)(1) of the Clean Air Act (CAA), 42 U.S.C. §§ 7413(a)(3) and 7414(a)(1).

**I. Statutory and Regulatory Background**

2. Section 113(a)(3)(B) of the CAA, 42 U.S.C. § 7413(a)(3)(B), authorizes the Administrator of EPA to issue an order requiring compliance with Subchapter VI of the CAA to any person who has violated or is violating any requirement of Subchapter VI. The Administrator of EPA has delegated her order authority to the Regional Administrator of EPA, Region 5 pursuant to EPA Headquarters Delegation 7-6-A. The Regional Administrator of EPA, Region 5, has delegated her order authority to the Director of the Air and Radiation Division pursuant to EPA Region 5 Delegation 7-6-A.

3. The Administrator of EPA may require any person who owns or operates an emission source to make reports and provide information required by the Administrator under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). The Administrator of EPA has delegated her information gathering authority to the Regional Administrator of EPA, Region 5 pursuant to

EPA Headquarters Delegation 7-8. The Regional Administrator of EPA, Region 5, has delegated her information gathering authority to the Director of the Air and Radiation Division pursuant to EPA Region 5 Delegation 7-8.

4. Subchapter VI of the CAA, 42 U.S.C. § 7671 *et seq.*, provides for the protection of stratospheric ozone. Section 608(b) of the CAA, 42 U.S.C. § 7671g(b) provides EPA with the authority to regulate the safe disposal of “Class I” and “Class II” substances. Class I and II substances include refrigerants containing chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs). EPA promulgated such regulations covering the safe disposal of CFCs and HCFCs from small appliances and motor vehicle air conditioners at 58 Fed. Reg. 28660 (May 14, 1993). These regulations for protection of the stratospheric ozone, recycling and emissions reduction are found in 40 C.F.R. Part 82, Subpart F.

5. Section 110(a) of the CAA, 42 U.S.C. § 7410(a), requires states to submit regulations to EPA providing for the attainment and maintenance of the National Ambient Air Quality Standards. If approved by EPA, these regulations become part of the State Implementation Plan (SIP).

6. In accordance with Section 110(a) of the CAA, on May 31, 1972, EPA approved 35 Illinois Administrative Code (IAC) 201.142 as part of the Illinois SIP. See 37 Fed. Reg. 10862. This rule contains a requirement that no person shall cause or allow the construction of any new emission source or any existing emission source or air pollution control equipment without first obtaining a construction permit from the Illinois Environmental Protection Agency (Illinois EPA).

7. Effective July 13, 1993, persons who take the final step in the disposal process (including but not limited to scrap recyclers) of small appliances and motor vehicle air

conditioners (MVACs) must either recover the refrigerant in accordance with specific procedures or verify with signed statements that the refrigerant was properly recovered prior to receipt of the small appliance or MVAC. See 40 C.F.R. § 82.156(f). If verification statements are used then the scrap recycler must notify the suppliers of the small appliance or MVAC of the need to properly recover the refrigerant. See 40 C.F.R. § 82.156(f)(3). The scrap recycler must keep verification statements on-site for a minimum of three years. See 40 C.F.R. § 82.166(i) and (m).

8. EPA's regulations for the protection of stratospheric ozone, recycling and emissions reduction define "person" to include any individual or legal entity. See 40 C.F.R. § 82.152.

9. EPA's regulations for the protection of the stratospheric ozone, recycling and emissions reduction define a "small appliance" as any appliance that is fully manufactured, charged, and hermetically sealed in a factory with five pounds or less of a class I or class II substance used as a refrigerant, including, but not limited to, refrigerators and freezers (designed for home, commercial, or consumer use), medical or industrial research refrigeration equipment, room air conditioners (including window air conditioners and packaged terminal air heat pumps), dehumidifiers, under the counter ice makers, vending machines, and drinking water coolers. See 40 C.F.R. § 82.152.

10. EPA's regulations for the protection of stratospheric ozone, recycling and emissions reduction define motor vehicle air conditioners (MVACs) as mechanical vapor compression refrigeration equipment used to cool the driver's or passenger's compartment of any motor vehicle. See 40 C.F.R. §§ 82.32 and 82.152.

## II. Findings

11. Behr owns and operates the following scrap metal recycling facilities (Behr Facilities):
- a. "The Peoria Yard," located at 2424 West Clarke Street, Peoria, Illinois;
  - b. "The Peoria Recycling Center," located at 3213 SW Washington Street, Peoria, Illinois;
  - c. "The Rockford Yard," located at 1100 Seminary Street, Rockford, Illinois;
  - d. "The Rockford Non-Ferrous Warehouse," located at 208 Quaker Road, Rockford, Illinois;
  - e. "The Bloomington Yard," located at 501 E. Stewart Street, Bloomington, Illinois;
  - f. "The South Beloit Yard," located at 201 Wheeler Avenue, South Beloit, Illinois;
  - g. "The South Beloit Recycling Center," located at 201 Wheeler Avenue, South Beloit, Illinois;
  - h. "The Woodstock Yard," located at 13914 Washington Street, Woodstock, Illinois;
  - i. "The Freeport Yard," located at 1319 RT. 75, Freeport, Illinois;
  - j. "The Machesney Park Recycling Center," located at 8409 N. 2nd Street, Machesney Park, Illinois;
  - k. "The Rochelle Recycling Center," located at 521 N. 2nd Street, Rochelle, Illinois;
  - l. "The Mason City Yard," located at 12050 W. State Street, Mason City, Iowa;
  - m. "The Clinton Yard," located at 2815 Liberty Avenue, Clinton, Iowa;
  - n. "The Riceville Yard," located at 2275 Dale Avenue, Riceville, Iowa; and
  - o. "The Monroe Yard," located at N. 2193 Clarno Rd., Monroe, Wisconsin.
12. Behr is a "person," as defined by 40 C.F.R. § 82.152.

13. Behr is a person who takes the final step in the disposal process of small appliances and MVACs at certain Behr Facilities and is subject to the requirements of 40 C.F.R. Part 82, Subpart F.

14. At the Peoria Yard, the Rockford Yard, the Bloomington Yard, the South Beloit Yard, the Woodstock Yard, the Freeport Yard, the Rochelle Yard, the Clinton Yard, and the Monroe Yard, Behr has accepted small appliances or MVACs without either recovering refrigerant or obtaining verification statements (as noted in paragraph 18) that meet all the requirements of 40 C.F.R. § 82.156(f).

15. At the Riceville Yard and the Mason City Yard, Behr buys and sells scrap pursuant to Iowa Administrative Code 567-118 that regulates the “demanufacture” (i.e., the removal of components, including but not limited to PCB-containing capacitors, ballasts, mercury-containing components, fluorescent tubes, and refrigerants) of appliances. As such, those yards only purchase appliances for recycling from certified demanufacturers. The Riceville Yard is certified to and does accept and demanufacture MVACs. The Mason City Yard only accepts MVACs from certified demanufacturers.

16. At the Peoria Recycling Center, the Rockford Non-Ferrous Warehouse, the South Beloit Recycling Center, and the Machesney Park Recycling Center, Behr is not in the regular practice of accepting small appliances or MVACs.

17. On March 21, 2012, Illinois EPA issued a Joint Construction and Lifetime Operating Permit to Behr, authorizing construction of a new hammermill shredder.

18. On March 28-29, 2012, EPA inspected the Peoria Yard to assess Behr’s compliance with the Clean Air Act. During the inspection, Behr representatives provided EPA inspectors with copies of “White Good Component Removal” forms, which they stated were

used for “individuals or infrequent suppliers of scrap material.” The forms used did not require the customer to include the name or address of the person who removed the refrigerant, or the date the refrigerant was removed. In addition, EPA inspectors saw a new hammermill shredder and associated pollution control equipment substantially installed and being prepared for operation.

19. On September 26, 2012, EPA issued Behr a Notice of Violation and Finding of Violation (NOV/FOV) alleging that the practices found during the inspection and noted in paragraph 18 were in violation of 40 C.F.R. § 82.156(f) because Behr neither recovered refrigerant from small appliances nor obtained the name and address of the person who removed the refrigerant or date the refrigerant was removed before accepting small appliances. EPA also alleged that Behr had violated SIP rule IAC 201.142 by beginning construction of air pollution control equipment before the issuance of a construction permit by the Illinois EPA.

20. On October 11, 2012, EPA inspected a scrap metal recycling facility owned and operated by the Morris Tick Company, Inc. (Morris Tick) in Bloomington, Illinois, to assess the facility’s compliance with the Clean Air Act. During the inspection, a Morris Tick representative stated that the yard did not collect any paperwork to verify that refrigerant had been properly removed from small appliances.

21. On May 9, 2013, EPA issued Morris Tick a Finding of Violation (FOV) alleging that the practices found during the inspection and noted in paragraph 20 were in violation of 40 C.F.R. § 82.156(f) because it neither recovered refrigerant from small appliances nor obtained proper verification statements before accepting small appliances. On May 31, 2013, Behr acquired certain assets of Morris Tick, and this facility is referred to in this Order as “the Bloomington Yard.”

22. On November 7, 2012, and August 8, 2013, Behr conferred with EPA concerning the alleged violations referenced in paragraphs 18 and 20, respectively.

### **III. Compliance Program**

23. Behr must comply with 40 C.F.R. Part 82, Subpart F at all Behr Facilities. Additionally, for any small appliance or MVAC that it receives at the Behr Facilities listed below, Behr must take the actions and maintain compliance as specified in paragraphs 24 through 34, below, for two years after the effective date of this Order.

- a. The Peoria Yard;
- b. The Rockford Yard;
- c. The Bloomington Yard;
- d. The South Beloit Yard;
- e. The Rochelle Yard;
- f. The Freeport Yard;
- g. The Woodstock Yard;
- h. The Clinton Yard; and
- i. The Monroe Yard.

24. Behr must not accept small appliances or MVACs with cut or dismantled refrigerant lines if it knows or has reason to know that the refrigerant has not been properly recovered in accordance with 40 C.F.R. § 82.156(g) and (h).

25. Behr must not accept small appliances or MVACs with cut or dismantled refrigerant lines unless its supplier can certify, using one of the verification statements included as Attachment 1 to this Order, that all refrigerant that had not leaked previously has been properly recovered. For suppliers with whom Behr has had a long-standing business

relationship, this requirement may be satisfied by Behr entering into the one of the contracts included as Attachment 2 to this Order.

26. Behr may accept small appliances or MVACs with intact refrigerant lines provided it uses refrigerant recovery equipment as described in paragraphs 30 and 31, below, to remove any remaining refrigerant.

27. Behr must notify its suppliers in writing that it will not accept small appliances or MVACs with cut or dismantled refrigerant lines, unless the suppliers can certify that the refrigerant was properly recovered prior to cutting or dismantling the refrigerant lines using one of the verification statements included as Attachment 1 to this Order or one of the contracts included as Attachment 2 to this Order.

28. If Behr chooses to purchase refrigerant recovery equipment at any facility listed in paragraph 23, Behr must notify its suppliers in writing that it will provide refrigerant recovery services at no additional cost or reduction in the value of the scrap.

29. Behr may satisfy the notice requirements of paragraphs 27 and 28 with a warning sign consistent with 40 C.F.R. § 82.156(f)(3) that is prominently displayed at its weigh station during the period of time that this Order is in effect.

30. If Behr accepts intact appliances or MVACs, Behr must either use its refrigerant recovery equipment to recover refrigerant from the units, or contract the services of a trained individual to do so. Behr will ensure that any individual using its own equipment is properly trained.

31. If Behr uses refrigerant recovery equipment at any yard listed in paragraph 23, Behr must use the refrigerant recovery log included as Attachment 3 to this Order at that facility. Behr must retain copies of receipts for all refrigerant it collects and sends to any other companies.

for reclamation. Behr must also keep a log for the small appliances it rejects, such log to contain the date the appliance was rejected, and the reason for rejecting the item(s).

32. Within six months after the effective date of this Order and at one year after the effective date of this Order, Behr must submit to EPA proof of its compliance with the notice requirements of paragraphs 27 and 28, and, where applicable, that it is using recovery equipment with an individual trained in recovering refrigerant as required by paragraph 30.

33. Within six months after the effective date of this Order and at one year after the effective date of this Order, Behr must submit to EPA copies of the following for each yard: all signed verification statements, all signed contracts, and all refrigerant recovery logs.

34. Behr must send all reports required by this Order to:

Attention: Compliance Tracker (AE-17J)  
Air Enforcement and Compliance Assurance Branch  
EPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

#### **IV. General Provisions**

35. Behr agrees to the terms of this Order.

36. Behr waives all remedies, claims for relief and otherwise available rights to judicial or administrative review that Behr may have with respect to any issue of fact or law set forth in this Order, including any right of judicial review under Section 307(b) of the CAA.

37. This Order does not affect Behr's responsibility to comply with other federal, state, and local laws.

38. This Order does not restrict EPA's authority to enforce any requirement of the CAA or its implementing regulations.

39. Failure to comply with this Order may subject Behr to penalties of up to \$37,500 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.

40. Behr may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information it submits to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If Behr fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined at 40 C.F.R. § 2.301.

41. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic record keeping efforts, please provide your response(s) to this Order without staples. Paper clips, binder clips, and 3-ring binders are acceptable.

42. The terms of this Order are binding on Behr, its assignees, and successors. Behr must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA that it has given the notice.

43. EPA may use any information submitted under this Order in an administrative, civil, judicial, or criminal action.

44. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate two years from the effective date, provided that

Behr has complied with all terms of the Order throughout its duration. Thereafter, Behr shall continue to comply with 40 C.F.R. Part 82, Subpart F.

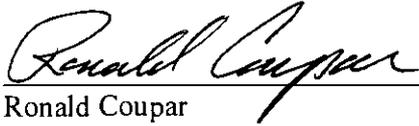
45. Each person signing this Order certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

46. Each party agrees to pay its own costs and attorneys' fees in this action.

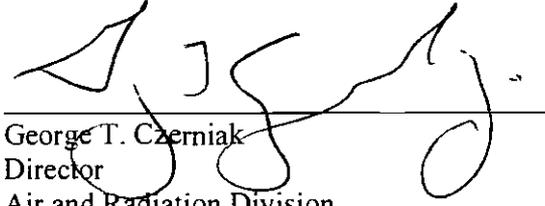
47. This Order constitutes the entire agreement between the parties.

12-19-2014  
Date

Behr Iron & Steel, Inc DBA

  
\_\_\_\_\_  
Ronald Coupar  
Environmental Manager  
Behr Iron and Metal

12/23/14  
Date

  
\_\_\_\_\_  
George T. Czerniak  
Director  
Air and Radiation Division  
U.S. Environmental Protection Agency, Region 5

**Attachment 1**  
**Behr Iron and Metal**  
**Verification Statements**

## Verification Statement - White Good Component Removal

I, the seller, certify and agree that all "white good components," as defined below, have been properly removed, in accordance with applicable EPA and State requirements, from "white goods" prior to delivery of such white goods to Behr Iron & Metal (or that such white good components were removed prior to my possession).

"White good components" are defined as follows:

- any refrigerant, including but not limited to chlorofluorocarbon (CFC) and hydrochlorofluorocarbons (HCFCs) as defined in Section 608 of the Clean Air Act and 40 CFR Part 82, Subpart F\*;
- any electrical switch containing mercury;
- any device that contains or may contain PCBs in a closed system, such as a dielectric fluid for a capacitor, ballast or other component; or
- any fluorescent lamp that contains mercury.

\* For white good(s) previously containing refrigerant, the following additional information is required in accordance with federal regulations on refrigerant recycling at 40 C.F.R. Part 82, Subpart F:

Date of Removal: \_\_\_\_\_  
Person / company  
performing removal: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_

Refrigerant leaked prior to my possession because (please provide reason):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I, the seller, further agree to indemnify and hold Behr Iron & Metal harmless from any claim, penalty, fine, fee, cost, attorney fees or other liability resulting in whole or in part from seller's breach of the above certification.

Date: \_\_\_\_\_  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
Signature: \_\_\_\_\_

**Agreement Regarding White Goods Component Removal**

I, the seller, certify and agree that all "white good components," as defined below, will be properly removed, in accordance with applicable EPA and State requirements, from "white goods" prior to delivery of such white goods to Behr Iron & Metal.

"White good components" are defined as follows:

- any refrigerant, including but not limited to chlorofluorocarbon (CFC) and hydrochlorofluorocarbons (HCFCs) as defined in Section 608 of the Clean Air Act and 40 CFR Part 82, Subpart F\*;
- any electrical switch containing mercury;
- any device that contains or may contain PCBs in a closed system, such as a dielectric fluid for a capacitor, ballast or other component; or
- any fluorescent lamp that contains mercury.

\* For white good(s) previously containing refrigerant, the following additional information is required in accordance with federal regulations on refrigerant recycling at 40 C.F.R. Part 82, Subpart F:

Date of Removal: \_\_\_\_\_  
Person / company performing removal: \_\_\_\_\_  
Address: \_\_\_\_\_

Refrigerant leaked prior to my possession because (please provide reason):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I, the seller, further agree to indemnify and hold Behr Iron & Metal harmless from any claim, penalty, fine, fee, cost, attorney fees or other liability resulting in whole or in part from seller's breach of the above certification.

Date: \_\_\_\_\_  
Seller Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Signature: \_\_\_\_\_

Behr Representative: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

## Certification of scrap automobile compliance

Seller certifies and agrees that all gasoline and lead acid batteries that were removed prior to delivery of any automobile to Behr Iron and Metal (Behr) were properly removed, in accordance with all applicable federal and State requirements.

Seller also certifies that all refrigerant and substitutes (including, but not limited to, chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) as defined in Section 608 of the Clean Air Act Amendments and 40 CFR Part 82) that were removed prior to the delivery of any automobile to Behr were properly removed and recovered in accordance with all applicable federal and state requirements. Seller understands that this certification serves as a contract pursuant to 40 C.F.R §82.156.

In addition, Seller certifies and agrees that it will notify Behr inspectors of any and all mercury switches that have not been removed prior to the delivery of the vehicle to Behr so that they may be properly removed by Behr in accordance with the NVMSRP (National Mercury Switch Recovery Program.)

Seller understands that Behr Iron & Metal will reject shipments of automobiles for noncompliance with this requirement.

Seller further agrees to indemnify and hold Behr harmless from any claim, penalty, fine, fee, cost, attorney fees, or other liability resulting in whole or in part from seller's breach of certification.

**Seller Name:** \_\_\_\_\_

**Seller** \_\_\_\_\_

**Address:** \_\_\_\_\_

\_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

## Agreement Regarding Scrap Automobile Compliance

Seller certifies and agrees that all gasoline and lead acid batteries that are removed prior to delivery of any automobile to Behr Iron and Metal (Behr) will be properly removed, in accordance with all applicable federal and State requirements.

Seller also certifies that all refrigerant and substitutes (including, but not limited to, chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) as defined in Section 608 of the Clean Air Act Amendments and 40 CFR Part 82) that have been removed prior to the delivery of any automobile to Behr will be properly removed and recovered in accordance with all applicable federal and state requirements. Seller understands that this certification serves as a contract pursuant to 40 C.F.R. §82.156.

In addition, Seller certifies and agrees that it will notify Behr inspectors of any and all mercury switches that have not been removed prior to the delivery of the vehicle to Behr so that they may be properly removed by Behr in accordance with the NVMSRP (National Mercury Switch Recovery Program.)

Seller understands that Behr Iron & Metal will reject shipments of automobiles for noncompliance with this requirement.

Seller further agrees to indemnify and hold Behr harmless from any claim, penalty, fine, fee, cost, attorney fees, or other liability resulting in whole or in part from seller's breach of certification.

Seller Name: \_\_\_\_\_

Seller Address: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Behr  
Representative: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Attachment 3**  
**Behr Iron and Metal**  
**Refrigerant Recovery Log**



**CERTIFICATE OF MAILING**

I, Loretta Shaffer, certify that I sent the Administrative Consent Order, EPA-5-15-113(a)-COE-1, by certified mail, return receipt requested, to:

Ronald Coupar  
Environmental Manager  
Behr Iron & Metal  
1100 Seminary Street  
Rockford, Illinois 61104

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-15-113(a)-COE-1, by first-class mail to

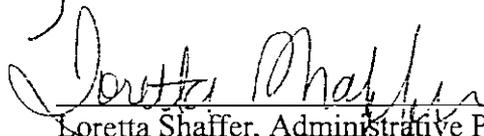
Eric Jones, Manager  
Bureau of Air, Compliance &  
Enforcement Section  
Illinois Environmental Protection  
Agency  
P.O. Box 19506  
Springfield, Illinois 62794

Brian Hutchins  
Air Quality Bureau  
Iowa Department of Natural Resources  
Environmental Services Division  
7900 Hickman Road, Ste 1  
Windsor Heights, IA 50324

Bill Bauman, Acting Director  
Bureau of Air Management  
Wisconsin Department of Natural  
Resources  
101 S. Webster St.  
PO Box 7921 (AM/7)  
Madison, WI 53702

Mark A. Smith, Chief  
Air Permitting and Compliance Branch  
U.S. Environmental Protection Agency  
11201 Renner Blvd.  
Lenexa, KS 66219

On the 8 day of January 2015.

  
\_\_\_\_\_  
Loretta Shaffer, Administrative Program Assistant  
AECAB, PAS

CERTIFIED MAIL RECEIPT  
NUMBER:

7009 1680 0000 7670 1037