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

JUN 28 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mark Halvorsen
Sensient Flavors, LLC
2300 Barrington Road, Suite 700
Hoffman Estates, Illinois 60169

Dear Mr. Halvorsen:

Enclosed is a file-stamped Consent Agreement and Final Order (CAFO) which resolves case docket number **CAA-05-2016-0028**. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on June 28, 2016.

Pursuant to paragraph 53 of the CAFO, Sensient Flavors, LLC, must pay the civil penalty within 30 days of the effective date of the CAFO. Your check must display the case docket number **CAA-05-2016-0028**.

Please direct any questions regarding this case to Maria Gonzalez, Associate Regional Counsel, at (312) 886-6630.

Sincerely,

Nathan Frank
Section Chief
Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure

cc: Ann Coyle, Regional Judicial Officer/C-14J
Regional Hearing Clerk/E-19J
Maria Gonzalez/C-14J
Tom Hess/MDEQ
Chris Hare/MDEQ

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No. CAA-05-2016-0028**
	)	
Sensient Flavors LLC,	)	**Proceeding to Assess a Civil Penalty**
Harbor Beach, Michigan,	)	**Under Section 113(d) of the Clean Air Act,**
	)	**42 U.S.C. § 7413(d)**
Respondent.	)	
	)	

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 113(d) of the Clean Air Act (the CAA), 42 U.S.C. § 7413(d), and Sections 22.1(a)(2), 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), as codified at 40 C.F.R. Part 22.

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

3. Respondent is Sensient Flavors LLC, a limited liability company doing business in Michigan.

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).

5. The parties agree that settling this action 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. Respondent consents to the assessment of the civil penalty specified in this CAFO and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its 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 its right to appeal this CAFO.

Statutory and Regulatory Background

9. Each state must submit to the Administrator of EPA (the Administrator) a plan for attaining and maintaining the National Ambient Air Quality Standards (NAAQS) under Section 110 of the CAA, 42 U.S.C. § 7410.

10. Under Section 110(a)(2) of the CAA, 42 U.S.C. § 7410(a)(2), each State Implementation Plan (SIP) must include a permit program to regulate the air pollution emissions of any stationary source as necessary to assure that NAAQS are achieved.

11. Pursuant to Section 113(a) and (b) of the CAA, 42 U.S.C. § 7413(a) and (b), upon EPA approval, SIP requirements are federally enforceable under Section 113 of the CAA. See also 40 C.F.R. § 52.23.

12. On May 6, 1980, EPA approved the requirements at MICH. ADMIN. CODE r. 336.1201 (Michigan Rule 201), as part of the federally enforceable Michigan SIP. 45 Fed. Reg. 29790 (May 6, 1980).

13. Michigan Rule 201 authorizes the Michigan Department of Environmental Quality (MDEQ) to, among other things, issue federally-enforceable permits to install (PTI) with conditions that are reasonably necessary to assure compliance with all applicable requirements.

14. Under Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating a

SIP. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

15. Under Section 114(a)(1) of the CAA, 42 U.SC. § 7414(a)(1), the Administrator of EPA may require any person who owns or operates an emission source to make reports; install, use and maintain monitoring equipment; sample emissions; and provide information required by the Administrator. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

16. The MDEQ issued Permit to Install (PTI) No. 85-96C to the Sensient Facility on October 9, 2008 (2008 PTI).

17. The 2008 PTI describes the hydrolyzed vegetable protein (HVP) reactors as being vented to a packed bed scrubber (HVP Reactor Room Scrubber). The HVP reactors have the Emission Unit ID EUHVPREACTORS.

18. The 2008 PTI describes the hydrochloric acid tank, two neutralization tanks, LAH tanks and casein hydrolysate still as being vented to a packed bed scrubber (Neutralization Tank Scrubber). The aforementioned units have the Emission Unit ID EUHCLNEULAHTANKS.

19. The 2008 PTI describes the emission units EUHVPREACTORS and EUHCLNEULAHTANKS as Flexible Group ID FGHVPHCLNEU.

20. Special Condition 1.2 of the 2008 PTI states that the permittee shall not operate FGHVPHCLNEU unless a malfunction abatement plan (MAP) for each packed bed scrubber system in FGHVPHCLNEU is implemented and maintained.

21. Special Condition 1.3 of the 2008 PTI states that the permittee shall not operate EUHVPREACTORS unless the HVP Reactor Room Scrubber is operated maintaining pH in the range of 8 to 10 and a maximum differential pressure of 4.0 inches water column.

22. Special Condition 1.4 of the 2008 PTI states that the permittee shall not operate EUHCLNEULAHTANKS unless the Neutralization Tank Scrubber is operated maintaining pH in the range of 8 to 10 and a maximum differential pressure of 4.0 inches water column.

23. MDEQ issued PTI No. 85-96D to the Facility on January 7, 2014 (2014 PTI).

24. The 2014 PTI describes the HVP reactors as being vented to the HVP Reactor Room Scrubber. The HVP reactors have the Emission Unit ID EUHVPREACTORS.

25. The 2014 PTI describes the two neutralization tanks and casein hydrolysate still as being vented to the Neutralization Tank Scrubber. These units have the Emission Unit ID EUNEUTANKS.

26. The 2014 PTI describes the hydrochloric acid tank and LAH tanks as being able to be vented to either the Neutralization Tank Scrubber or the HVP Reactor Room Scrubber. These units have the Emission Unit ID EUHCLLAHTANKS.

27. The 2014 PTI describes the emission units EUHVPREACTORS, EUNEUTANKS, and EUHCLLAHTANKS as being Flexible Group ID FGHVPHCLNEU.

28. FGHVPHCLNEU Condition III.1 of the 2014 PTI states that the permittee shall not operate FGHVPHCLNEU unless a MAP for each packed bed scrubber system in FGHVPHCLNEU is implemented and maintained.

29. FGHVPHCLNEU Condition IV.1 of the 2014 PTI states that the permittee shall not operate EUHVPREACTORS unless the HVP Reactor Room Scrubber is operated with a maximum differential pressure of 4.0 inches water column.

30. FGHVPHCLNEU Condition IV.2 of the 2014 PTI states that the permittee shall not operate EUNEUTANKS unless the Neutralization Tank Scrubber is operated with a maximum differential pressure of 4.0 inches water column.

31. FGHVPHCLNEU Condition IV.3 of the 2014 PTI states that the permittee shall not operate EUHCLLAHTANKS unless the Neutralization Tank Scrubber or the HVP Reactor Room Scrubber is operated with a maximum differential pressure of 4.0 inches water column.

32. The Administrator of EPA may assess a civil penalty of up to $37,500 per day of violation, up to a total of $295,000, for violations that occurred from January 12, 2009, through December 5, 2013, and may assess a civil penalty of up to $37,500 per day of violation, up to a total of $320,000, for violations that occurred on or after December 6, 2013, under Section 113(d)(1) of the CAA, 42 U.S.C. § 7413(d)(1), and 40 C.F.R. Part 19.

33. Section 113(d)(1) limits the Administrator's authority to matters where the first alleged date of violation occurred no more than 12 months prior to initiation of the administrative action, except where the Administrator and the Attorney General of the United States jointly determine that a matter involving a longer period of violation is appropriate for an administrative penalty action.

34. The Administrator and the Attorney General of the United States, each through their respective delegates, have determined jointly that an administrative penalty action is appropriate for the period of violations alleged in this CAFO.

Factual Background and Alleged Violations

35. Sensient owns and operates a food flavoring production plant located at 79 State Street, Harbor Beach, Michigan (the Facility).

36. Sensient operates HVP reactors and neutralization equipment at the Facility that are subject to the requirements of a PTI issued by MDEQ pursuant to Michigan Rule 201 of the approved Michigan SIP.

37. Sensient owns or operates an "emission source" within the meaning of Section 114(a)(1) of the CAA, 42 USC. § 7414(a)(1). Therefore, Sensient is subject to the requirements of Section 114(a)(1).

38. On February 14, 2014, EPA issued a request for information pursuant to Section 114 of the CAA to Sensient (Information Request).

39. In response to the Information Request, Sensient provided EPA with various records including the Facility's MAP and parametric monitoring records for the HVP Reactor Room Scrubber and Neutralization Tank Scrubber.

40. From July 1, 2010, through January 6, 2014, Sensient operated EUHVPREACTORS during periods when the pH and/or differential pressure at the HVP Reactor Room Scrubber were outside of the permitted ranges, in violation of Special Condition 1.3 of the 2008 PTI.

41. From January 7, 2014, to February 27, 2014, Sensient operated EUHVPREACTORS during periods when the differential pressure at the HVP Reactor Room Scrubber was outside operating limits in violation of FGHVPHCLNEU Condition IV.1 of the 2014 PTI.

42. From July 1, 2010, through January 6, 2014, Sensient operated EUHCLNEULAHTANKS during periods when the pH and/or differential pressure at the Neutralization Tank Scrubber were outside of the permitted ranges, in violation of Special Condition 1.4 of the 2008 PTI.

43. From January 7, 2014, to February 27, 2014, Sensient operated EUNEUTANKS during periods when the differential pressure at the Neutralization Tank Scrubber was outside operating limits in violation of FGHVPHCLNEU Condition IV.2 of the 2014 PTI.

44. From January 7, 2014, to February 27, 2014, Sensient operated EUHCLLAHTANKS during periods when the differential pressures at either the Neutralization Tank Scrubber or the HVP Reactor Room Scrubber were greater than 4.0 inches water column, in violation of FGHVPHCLNEU Condition IV.3 of the 2014 PTI.

45. From July 1, 2010, through January 6, 2014, Sensient operated FGHVPHCLNEU while not implementing the MAP, in violation of Special Condition 1.2 of the 2008 PTI.

46. From January 7, 2014, to February 27, 2014, Sensient operated FGHVPHCLNEU while not implementing the MAP, in violation of FGHVPHCLNEU Condition III.1 of the 2014 PTI.

47. Sensient's violations of the pH and differential pressure limits and MAP requirements are violations of its PTIs and the applicable Michigan SIP requirements.

48. On June 29, 2015, EPA issued to Sensient a Notice of Violation alleging that it violated its operating permits and the Michigan SIP as outlined in paragraphs 40 through 47, above.

49. On August 25, 2015, representatives of Sensient and EPA discussed the June 29, 2015 Notice of Violation.

50. On September 8, 2015, Sensient provided supplemental information to EPA via electronic mail confirming the facility's return to compliance with its PTI.

51. Respondent executed an Administrative Consent Order with EPA that went into effect on May 5, 2016.

Civil Penalty

52. Based on analysis of the factors specified in Section 113(e) of the CAA, 42 U.S.C. § 7413(e), the facts of this case and Sensient's cooperation, prompt return to

compliance, and agreement to perform supplemental environmental projects, Complainant has determined that an appropriate civil penalty to settle this action is $32,555.

53. Within 30 days after the effective date of this CAFO, Respondent must pay a $32,555 civil penalty by sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

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

Or, for checks sent by express mail (non-U.S. Postal Service which will not deliver mail to P.O. Boxes), sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

U.S. Bank
Government Lockbox 979077
U.S. EPA Fines and Penalties
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, Missouri 63101

The check must note Respondent's name and the docket number of this CAFO.

54. Respondent must send a notice of payment that states Respondent's name and the docket number of this CAFO to EPA at the following addresses when it pays the penalty:

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

Maria Gonzalez (C-14J)
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Regional Hearing Clerk (E-19J)
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

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

56. If Respondent does not pay timely the civil penalty or any stipulated penalties due under paragraph 69, below, EPA may request the Attorney General of the United States to bring an action to collect any unpaid portion of the penalty with interest, nonpayment penalties and the United States enforcement expenses for the collection action under Section 113(d)(5) of the CAA, 42 U.S.C. § 7413(d)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

57. Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any overdue amount from the date payment was due at a rate established by the Secretary of the Treasury pursuant to 26 U.S.C. § 6621(a)(2). Respondent must pay the United States enforcement expenses, including but not limited to attorney's fees and costs incurred by the United States for collection proceedings. In addition, Respondent must pay a quarterly nonpayment penalty each quarter during which the assessed penalty is overdue. 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. 42 U.S.C. § 7413(d)(5).

Supplemental Environment Projects

58. Respondent must complete the following supplemental environmental projects (SEPs) designed to protect the environment and public health by voluntarily implementing energy efficiency projects.

59. At its Harbor Beach facility, Respondent must complete the SEPs as follows:

a. Burner SEP - Respondent will replace a natural gas burner and gas train at its tower dryer that will reduce nitrogen oxide (NO_x) and particulate matter (PM) emissions.

b. Motor SEP - Respondent will replace 10 electric motors at the Facility with higher-efficiency motors that will reduce electrical consumption and those pollutants generated by electricity generating facilities serving the facility.

c. Lighting SEP - Respondent will replace existing light fixtures with 138 high-efficiency LED light fixtures that will reduce electrical consumption and those pollutants generated by electricity generating facilities serving the facility.

60. For each of the SEPs described in paragraph 59, Respondent must also meet the following deadlines and requirements:

a. Within 30 calendar days of the effective date of this CAFO, Respondent must place a firm order for all equipment and/or sign contracts for the implementation for the SEPs. Respondent shall submit copies of all final equipment orders and contracts within 7 days of order or signature.

b. Within 200 calendar days of the effective date of this CAFO, Respondent must complete implementation of the SEPs.

61. Respondent must spend at least $245,000 to implement the three SEPs.

62. Respondent certifies as follows:

I certify that Sensient Flavors LLC is not required to perform or develop the SEP by any law, regulation, order, or agreement or as injunctive relief as of

the date that I am signing this CAFO. I further certify that Sensient Flavors LLC has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

I certify that Sensient Flavors LLC is not a party to any open federal financial assistance transaction that is funding or could be used to fund the same activity as the SEP. I further certify that, to the best of my knowledge and belief after reasonable inquiry, there is no such open federal financial transaction that is funding or could be used to fund the same activity as the SEP, nor has the same activity been described in an unsuccessful federal financial assistance transaction proposal submitted to EPA within two years of the date that I am signing this CAFO (unless the project was barred from funding as statutorily ineligible). For purposes of this certification, the term "open federal financial assistance transaction" refers to a grant, cooperative agreement, loan, federally-guaranteed loan guarantee or other mechanism for providing federal financial assistance whose performance period has not expired.

63. EPA may inspect the Facility at any time to monitor Respondent's compliance with this CAFO's SEP requirements.

64. Respondent must submit a SEP completion report to EPA by no later than 30 days after the completion of the SEPs. This report must contain the following information:

a. Detailed description of each of the SEPs as completed;

b. Description of any equipment or installation problems and the actions taken to correct the problems;

c. Itemized cost of goods and services used to complete each of the SEPs documented by copies of invoices, purchase orders or cancelled checks that specifically identify and itemize the individual cost of the goods and services;

d. Certification that Respondent has completed all of the SEPs in compliance with this CAFO; and

e. Description of the environmental and public health benefits resulting from the SEPs (quantify the benefits and pollution reductions, if feasible).

65. Respondent must submit all notices and reports required by this CAFO by first-class mail to the Compliance Tracker of the Air Enforcement and Compliance Assurance Branch at the address provided in paragraph 54, above.

66. In each report that Respondent 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, it 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.

67. Following receipt of the SEP completion report described in paragraph 64, above, EPA must notify Respondent in writing that:

a. It has satisfactorily completed the SEPs and the SEP report;

b. There are deficiencies in the SEPs as completed or in the SEP report and EPA will give Respondent 30 days to correct the deficiencies; or

c. It has not satisfactorily completed the SEPs or the SEP report and EPA will seek stipulated penalties under paragraph 69.

68. If EPA exercises option b above, Respondent may object in writing to the deficiency notice within 10 days of receiving the notice. The parties will have 30 days from EPA's receipt of Respondent's objection to reach an agreement. If the parties cannot reach an agreement, EPA will give Respondent a written decision on its objection. Respondent will comply with any requirement that EPA imposes in its decision. If Respondent does not complete the SEP as required by EPA's decision, Respondent will pay stipulated penalties to the United States under paragraph 69, below.

69. If Respondent violates any requirement of this CAFO relating to the SEPs, Respondent must pay stipulated penalties to the United States as follows:

a. Except as provided in subparagraph b, below, if Respondent did not complete the SEPs satisfactorily according to the requirements of this CAFO, including the schedule in paragraph 60, Respondent must pay a penalty of $120,000.

b. If Respondent did not complete the SEP satisfactorily, but EPA determines that Respondent made good faith and timely efforts to complete the SEPs and certified, with supporting documents, that it spent at least 90 percent of the amount set forth in paragraph 61, Respondent will not be liable for any stipulated penalty under subparagraph a, above.

c. If Respondent completed the SEPs satisfactorily, but spent less than 90 percent of the amount set forth in paragraph 61, Respondent must pay a penalty of $15,000.

d. If Respondent did not submit timely the SEP completion report, or any other report required by paragraph 64, Respondent must pay penalties in the following amounts for each day after the report was due until it submits the report:

Penalty per violation per day	Period of violation
$50	1st through 14th day
$100	15th through 30th day
$200	31st day and beyond

70. EPA's determinations of whether Respondent completed the SEPs satisfactorily and whether Respondent made good faith and timely efforts to complete the SEPs will bind Respondent.

71. Respondent must pay any stipulated penalties within 15 days of receiving EPA's written demand for the penalties. Respondent will use the method of payment specified in paragraph 53, above, and will pay interest and nonpayment penalties on any overdue amounts.

72. Any public statement that Respondent makes referring to any of the SEPs must include the following language: "Sensient Flavors LLC undertook this project under the settlement of the United States Environmental Protection Agency's enforcement action against Sensient Flavors LLC for violations of the Clean Air Act."

73. If an event occurs which causes or may cause a delay in completing any of the SEPs as required by this CAFO:

a. Respondent must notify 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),

Respondent's past and proposed actions to prevent or minimize the delay and a schedule to carry out those actions. Respondent must take all reasonable actions to avoid or minimize any delay. If Respondent fails to notify EPA according to this paragraph, Respondent will not receive an extension of time to complete the SEP.

b. If the parties agree that circumstances beyond the control of Respondent 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 EPA does not agree that circumstances beyond the control of Respondent caused or may a delay in completing the SEP, EPA will notify Respondent in writing of its decision and any delays in completing the SEP will not be excused.

d. Respondent 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.

74. For federal income tax purposes, Respondent will neither capitalize into inventory or basis, nor deduct any costs or expenditures incurred in performing the SEPs.

General Provisions

75. Consistent with the Standing Order Authorizing E-Mail Service of Orders and Other Documents Issued by the Regional Administrator or Regional Judicial Officer under the Consolidated Rules, dated march 27, 2015, the parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: gonzalez.maria@epa.gov (for Complainant), and ronald.tenpas@morganlewis.com (for Respondent). The parties waive their right to service by the methods specified in 40 C.F.R. § 22.6.

76. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in this CAFO.

77. The effect of the Settlement described in paragraph 76 above, is conditioned upon the accuracy of Respondent's representations to EPA, as memorialized in paragraph 50 of this CAFO and Respondent's information submitted via electronic mail on September 8, 2015.

78. The CAFO does not affect the rights of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violation of law.

79. This CAFO does not affect Respondent's responsibility to comply with the CAA and other applicable federal, state and local laws. Except as provided in paragraph 76, above, compliance with this CAFO will not be a defense to any actions subsequently commenced pursuant to federal laws administered by EPA.

80. Respondent certifies that it is complying fully with the Michigan SIP and permits issued under Michigan Rule 201.

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

82. The terms of this CAFO bind Respondent, its successors and assigns.

83. Each person signing this consent agreement 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.

84. Each party agrees to bear its own costs and attorney's fees in this action.

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

Consent Agreement and Final Order
In the Matter of: Sensient Flavors LLC
Docket No. CAA-05-2016-0028

Sensient Flavors LLC, Respondent

6/13/2016
Date

Gautam Grover
President
Sensient Flavors LLC

United States Environmental Protection Agency, Complainant

6/21/16
Date

Edward Nam
Acting Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

Consent Agreement and Final Order
In the Matter of: Sensient Flavors LLC
Docket No. CAA-05-2016-0028

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

6/24/16
Date

Robert A. Kaplan
Acting Regional Administrator
U.S. Environmental Protection Agency
Region 5

In the matter of:
Docket Number: **CAA-05-2016-0028**

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, which was filed on [JUN 28 2016], this day in the following manner to the addressees:

Copy by certified mail
return-receipt requested:

Mark Halvorsen
Sensient Flavors, LLC
2300 Barrington Road, Suite 700
Hoffman Estates, Illinois 60169

Copy by e-mail to
Complainant:

Maria Gonzalez
gonzalez.maria@epa.gov

Copy by e-mail to
Regional Judicial Officer:

Ann Coyle
coyle.ann@epa.gov

Dated: June 28, 2016 LaDawn Whitehead

LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5

CERTIFIED MAIL RECEIPT NUMBER(S): 7011 1150 0000 2640 7155