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

SEP 25 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Scott M. Schumann
I Schumann & Co. LLC
22500 Alexander Road
Bedford, Ohio 44146

Dear Mr. Schumann:

Enclosed is a file-stamped Consent Agreement and Final Order (CAFO) which resolves I Schumann & Co. LLC and case docket no. **CAA-05-2015-0062**. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on September 25, 2015.

Pursuant to paragraph 54 of the CAFO, I Schumann & Co. LLC must pay the civil penalty within 30 days of October 26, 2015. Your electronic funds transfer must display the case name and case, docket number.

Please direct any questions regarding this case to Mary McAuliffe, Office of Regional Counsel, (312) 886-6237.

Sincerely,

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

Enclosure

cc: Regional Judicial Officer/C-14J
Regional Hearing Clerk/E-19J
Mary McAuliffe/C-14J
Ed Fasko, Ohio EPA NE District, Division of Air Pollution Control

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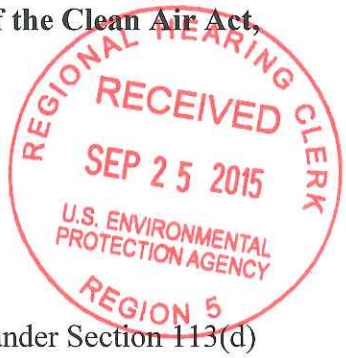
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No. CAA-05-2015-0062**
	)	
I Schumann & Co. LLC	)	**Proceeding to Assess a Civil Penalty**
Bedford, Ohio,	)	**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 I Schumann & Co. LLC (I Schumann), a corporation doing business in the State of Ohio.

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.

9. In satisfaction of the notice requirements of Section 113(a) of the CAA, on August 8, 2013, EPA issued to Respondent a notice and finding of violation (NOV/FOV) and provided a copy of the NOV/FOV to Ohio, providing notice to both that the EPA found that Respondent committed the alleged violations described in Section D of this Agreement and providing Respondent an opportunity to confer with the EPA. On January 13, 2014, representatives of Respondent and the EPA discussed the August 8, 2013 NOV/FOV.

10. On March 6, 2014, EPA issued a Finding of Violation (FOV) to I Schumann for alleged violations described below.

11. 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.

12. 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 Allegations and Alleged Violations

The National Emission Standards for Hazardous Air Pollutants

13. Under Section 112 of the CAA, U.S.C. § 7412, EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Nonferrous Metals Processing Area Sources (NESHAP Subpart TTTTTT) at 40 C.F.R. §§ 63.11462 through 63.11474. NESHAP Subpart TTTTTT applies to the owner or operator of a secondary nonferrous metals processing facility as defined in 40 C.F.R. § 63.11472.

14. 40 C.F.R. Part 63, Subpart A, contains the general provisions for the NESHAPs.

15. 40 C.F.R. § 63.6(e)(1)(i) states in part, "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."

16. 40 C.F.R. § 63.11463(d) states that an affected source is new if you commenced construction or reconstruction of the affected source after September 20, 2007.

17. 40 C.F.R. § 63.11465(a) states that you must route the emissions from each existing affected source through a fabric filter or baghouse that achieves a particulate matter (PM) control efficiency of at least 99.0 percent or an outlet PM concentration limit of 0.034 grams per dry standard cubic meter (g/dscm)(0.015 grains per dry standard cubic feet (gr/dscf)).

18. 40 C.F.R. § 63.11465(b) states that you must route the emissions from each new affected source through a fabric filter or baghouse that achieves a PM control efficiency of at least 99.5 percent or an outlet PM concentration limit of 0.010 gr/dscf.

19. 40 C.F.R. § 63.11466(a) states that if you own or operate an existing or new affected source, you must conduct a performance test for each affected source within 180 days of your compliance date and report the results in your Notification of Compliance Status.

20. 40 C.F.R. § 63.11467(a) provides that you must demonstrate initial compliance with the applicable standards in § 63.11465 by submitting a Notification of Compliance Status.

21. 40 C.F.R. § 63.11467(b) requires that you conduct a baghouse inspection specified in 40 C.F.R. § 63.11467(c) and include the results of the inspection in the Notification of Compliance Status.

22. 40 C.F.R. § 63.11469(a) states that you must submit the Initial Notification required by § 63.9(b)(2) no later than 120 days after the applicable compliance date specified in § 63.11464. The Initial Notification must include the information specified in § 63.9(b)(2)(i) through (iv) and may be combined with the Notification of Compliance Status required in § 63.11467 and 40 C.F.R. § 63.11469(b) if you choose to submit both notifications within 120 days.

23. 40 C.F.R. § 63.11468(c) states that for each new affected source, you must install, operate, and maintain a bag leak detection system.

Federally Enforceable State Operating Permits

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

25. EPA promulgated approval of the Ohio Federally Enforceable State Operating Program (FESOP) on October 30, 1995 as part of the State of Ohio's State Implementation Plan. 60 Fed. Reg. 55200. Ohio's FESOP program became effective on December 29, 1995.

26. FESOP permits are described as a Federally Enforceable Permits-to-Install and Operate (FEPTIO) by the Ohio Environmental Protection Agency (Ohio EPA).

27. The Ohio EPA issued a Permit-to-Install and Operate, No.: 13-04754, to I Schumann on September 16, 2008 (September 2008 FEPTIO Permit).

28. Ohio EPA issued a Permit-to-Install and Operate, No.: P0105751, to I Schumann on December 15, 2010 (December 2010 FEPTIO Permit No. 1).

29. Condition C.1.f)(1)a. of the December 2010 FEPTIO Permit No. 1 provides that for emission unit P009, Electric Induction Furnace No. 1, and emission unit P010, Electric Induction Furnace No. 2, vented to Baghouse No. 1, compliance with the emission limitation shall be demonstrated through emission testing, and shall be determined based on the stack test results for this baghouse using the gr/dscf multiplied by the corresponding dscf air flow contribution to the baghouse from each emissions unit to determine the pound per hour (lb/hr) emission rate or alternatively, compliance may be determined by summing the allowable emission limits for all of the emissions units that are operating during the stack test and compare to the total lb/hr stack test result(s).

30. Ohio EPA issued an amended Permit-to-Install and Operate, No.: P0095703, to I Schumann on December 15, 2010 (December 2010 FEPTIO Permit No. 2).

31. Condition C.1.b)(2)b.i. of the December 2010 FEPTIO Permit No. 2 provides that for the emission unit P003, Rotary Melting Furnace No. 3, the installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement: the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

32. Condition C.1.f)(2)b. of the December 2010 FEPTIO Permit No. 2 provides that for the emission unit P003, Rotary Melting Furnace No. 3, emission testing shall be conducted on Baghouses No. 2 and No. 3 to demonstrate compliance with the allowable mass emission rate(s) for particulates and opacity in the appropriate averaging period(s).

33. Ohio EPA issued a Permit-to-Install and Operate, No.: P0108039, to I Schumann on May 12, 2011 (May 2011 FEPTIO Permit).

34. Condition C.1.f)(2)b. of the May 2011 FEPTIO Permit states that for the emission unit P004, Rotary Melting Furnace No. 4, emission testing shall be conducted on Baghouses No. 3 and No. 4 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).

35. Condition C.2.f)(2)b. of the May 2011 FEPTIO Permit provides that for the emission unit P005, Rotary Melting Furnace No. 5, emission testing shall be conducted on Baghouses No. 1 and No. 3 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).

36. Condition C.3.f)(2)b. of the May 2011 FEPTIO Permit provides that for the emission unit P006, Rotary Melting Furnace No. 6, emission testing shall be conducted on Baghouses No. 1, No. 2, and No. 3 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).

37. Condition C.4.b)(2)b.i. of the May 2011 FEPTIO Permit provides that for the emission unit P008, Rotary Melting Furnace No. 7, the installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement: the collection efficiency shall be sufficient

to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

38. Condition C.4.f)(3)b. of the May 2011 FEPTIO Permit provides that for the emission unit P008, Rotary Melting Furnace No. 7, emission testing shall be conducted on Baghouses No. 2, No. 3, and No. 4 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).

39. I Schumann owns and operates the facility located at 22500 Alexander Road, Bedford, Ohio (the Facility).

40. The Facility produces brass and bronze ingots.

41. The Facility is a "secondary nonferrous metals processing facility."

42. The Facility is an area source of HAPs.

43. The Facility is subject to the requirements of 40 C.F.R. Part 63, Subpart TTTTTT and certain General Provisions at 40 C.F.R. §§ 63.1 through 63.15.

44. The Facility has two EIFs (Furnaces No. 1 and No. 2) and five rotary furnaces (Furnaces No. 3, No. 4, No. 5, No. 6, and No. 7).

45. Furnaces No. 1 through No. 7 are furnace melting operations.

46. Furnaces No. 3 through No. 7 are existing affected sources.

47. The Ohio EPA issued a September 2008 FEPTIO Permit to I Schumann. This permit allowed I Schumann to replace the existing electric induction furnaces (EIFs) with new EIFs (Furnace No. 1 and Furnace No. 2).

48. Ohio EPA issued a December 2010 FEPTIO Permit No. 1 to I Schumann.

49. Furnaces No. 1 and No. 2 were replaced after Ohio EPA issued the September 2008 FEPTIO.

50. Furnaces No. 1 and No. 2 are new affected sources.

51. In the April 8, 2013 NOV/FOV to I Schumann, EPA alleges that I Schumann failed to route emission from furnaces through the fabric filter, failed to meet requirements in the Initial Notification and Notification of Compliance Status, and failed to install and operate a bag leak detection system as required in NESHAP Subpart TTTTTT. The NOV/FOV also alleged that I Schumann failed to demonstrate compliance with emission limits in its FEPTIO Permits and failed to adequately vent emissions from furnaces to their control devices, as required by the FEPTIO Permits.

52. In the March 6, 2014 FOV to I Schumann, EPA alleges that I Schumann exceeded PM emission limits in NESHAP Subpart TTTTTT at Furnace No. 1 and Furnace No. 2.

Civil Penalty

53. 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 any other factor such as cooperation, prompt return to compliance, agreement to perform a supplemental environmental project, Complainant has determined that an appropriate civil penalty to settle this action is $40,000.

54. Within 30 days after the effective date of this CAFO, Respondent must pay a $40,000 civil penalty by ACH electronic funds transfer, payable to "Treasurer, United States of America," and sent to:

US Treasury REX/Cashlink ACH Receiver
ABA: 051036706
Account Number: 310006, Environmental Protection Agency
CTX Format Transaction Code 22-checking

In the comment area of the electronic funds transfer, state Respondent's name and the docket number of this CAFO.

55. 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

Mary McAuliffe (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

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

57. If Respondent does not pay timely the civil penalty or any stipulated penalties due under paragraph 67, 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.

58. 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 attorneys 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 Project

59. Respondent must complete a supplemental environmental project (SEP) designed to protect families by abating lead-based paint hazards in a number of residential properties and day care facilities in or about the Cleveland, Ohio area, as further described below. This SEP may include, but is not limited to, window replacement, the removal of lead-based paint and dust, the permanent enclosure or encapsulation of lead-based paint, and the replacement of lead-based painted surfaces or fixtures.

60. Respondent must complete the SEP as follows: the Respondent will contract with a local not-for-profit organization ("NFP") experienced in lead abatement work to promptly undertake and complete such work in or about the Cleveland, Ohio area. Respondent has tentatively selected Cleveland Housing Network, which is acceptable to EPA. The foregoing statement shall not be construed to prohibit Respondent from selecting a different NFP. Respondent shall require the NFP to conduct the SEP according to all applicable federal and state work practice and notification requirements including, but not limited to, the United States Department of Housing and Urban Development's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing and the State of Ohio, unless otherwise specifically provided in this CAFO. Respondent must fully fund a segregated account with the NFP to pay for the lead abatement SEP not later than 90 days after the effective date of this CAFO. The SEP must be completed not later than two years after the effective date of this CAFO. Respondent must spend at least $125,000 for the lead abatement SEP.

61. SEP Certifications:

a. Respondent certifies that it is 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.

b. Respondent certifies that it has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

c. Respondent certifies that it 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.

d. Respondent certifies that, to the best of its knowledge and belief after reasonable inquiry, there is no such open federal financial assistance 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 of this settlement (unless the project was barred from funding as statutorily ineligible). For the 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 yet expired. The parties agree that the NFP certifying to the lack of another federal financial assistance transaction shall satisfy Respondent's obligation for reasonable inquiry under this subparagraph.

62. Respondent must submit a SEP completion report to EPA no later than 30 days after Respondent receives a report from the NFP that the SEP is complete. This report must contain the following information:

a. Detailed description of the SEP as completed;

b. Description of any problems implementing the SEP and the actions taken to correct the problems;

c. Itemized cost 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 cost of the goods and services;

d. Certification that Respondent has completed the SEP 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).

Include the number of properties from which lead was removed under the SEP.

63. Respondent must submit the SEP Completion Report by first class mail to the Compliance Tracker of the Air Enforcement and Compliance Assurance Branch at the address provided in paragraph 55, above.

64. In the SEP Completion Report, Respondent 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.

In certifying the report, the signatory may rely on documentation, assertions or other information provided by the NFP.

65. Following receipt of the SEP completion report described in paragraph 62, above, EPA must notify Respondent 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 that EPA will give Respondent 30 days to correct the deficiencies; or

c. It has not satisfactorily completed the SEP or the SEP report and EPA will seek stipulated penalties under paragraph 67.

66. 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 67, below.

67. If Respondent violates any requirement of this CAFO relating to the SEP, 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 SEP satisfactorily according to the requirements of this CAFO, Respondent must pay a stipulated penalty of $150,000.

b. If Respondent did not complete the SEP satisfactorily, but EPA determines that Respondent made good faith and timely efforts to complete the SEP and certified, with supporting documents, that it spent at least 90 percent of the amount set forth in paragraph 60, Respondent will not be liable for any stipulated penalty under subparagraph a, above.

c. If Respondent completed the SEP satisfactorily, but spent less than 90 percent of the amount set forth in paragraph 60, Respondent must pay a penalty of $50,000.

d. If Respondent did not timely submit the SEP completion report required by paragraph 62, 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
$100	1st through 14th day
$150	15th through 30th day
$200	31st day and beyond

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

69. 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 54, above, and will pay interest and nonpayment penalties on any overdue amounts.

70. Any public statement that Respondent makes referring to the SEP must include the following language: "I Schumann & Co. LLC undertook this project under the settlement of

the United States Environmental Protection Agency's enforcement action against I Schumann & Co. LLC for violations of the Clean Air Act." Respondent's contractual agreement with the NFP shall not be considered such a public statement.

71. Force Majeure: If an event occurs which causes or may cause a delay in completing the SEP 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 may 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 cause 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.

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

General Provisions

73. Consistent with the "Standing Order Authorizing E-Mail Service of Order 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: mcauliffe.mary@epa.gov (for Complainant); and

sschumann@ischumann.com and mmcmahon@mdllp.net (for Respondent). The parties waive their right to service by the methods specified in 40 C.F.R. § 22.6.

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

75. 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.

76. 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 74, above, compliance with this CAFO will not be a defense to any actions subsequently commenced pursuant to federal laws administered by EPA.

77. Respondent certifies that by January 31, 2016, it will be complying fully with the NESHAP Subpart TTTTTT, the Ohio SIP and its permits.

78. 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).

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

80. 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.

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

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

I Schumann & Co. LLC, Respondent

9/15/15
Date

Scott M. Schumann
Scott M. Schumann
President and Chief Operating Officer
I Schumann & Co. LLC

United States Environmental Protection Agency, Complainant

9/23/15
Date

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

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.

23 September 2015
Date

Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency
Region 5

In the Matter of: I Schumann & Co. LLC
Docket Number: **CAA-05-2015-0062**

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 September 25, 2015, this day in the following manner to the addressees:

Copy by Certified Mail
Return-Receipt Requested:

Scott M. Schumann
I Schumann & Co. LLC
22500 Alexander Road
Bedford, Ohio 44146

Copy by E-mail to
Complainant:

Mary McAuliffe
McAuliffe.Mary@epa.gov

Copy by E-mail to
Regional Judicial Officer:

Ann Coyle
coyle.ann@epa.gov

Dated: September 25, 2015

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

CERTIFIED MAIL RECEIPT NUMBER(S): 7011 1150 0000 2640 4499