



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Certified Mail No. 7016 1370 0000 2234 8466
Return Receipt Requested

Mr. Kiley Ayoso, President
Simply Building, Inc.
97 Menlo Avenue
Daly City, CA 94015

MAY 03 2017

Re: Consent Agreement and Final Order
In the Matter of Simply Building, Inc.

Dear Mr. Ayoso:

Please find enclosed the final executed Consent Agreement and Final Order (CA/FO) negotiated between the United States Environmental Protection Agency, Region 9 (EPA), and Simply Building, Incorporated (SBI).

This CA/FO sets out the terms for resolution of the Toxic Substances Control Act (TSCA) administrative civil penalty action against SBI for its alleged failure to adhere to the Renovation, Repair and Painting Rule when work was performed at a 2015 residential home located in San Francisco, California.

SBI's full compliance with the payment terms of this CA/FO and completion of all tasks in accordance with the terms of this CA/FO will close this case. If you have any questions regarding the alleged TSCA violations governing your operations or the rules which govern the proceedings terminated by the enclosed document, please contact Christopher Rollins of my staff at (415) 947-4166, or Azure'De M. Wilkins, in the Office of Regional Counsel, at (415) 972-3554.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathleen H. Johnson".

Kathleen H. Johnson
Director, Enforcement Division
U.S. Environmental Protection Agency, Region 9

Enclosure

1 UNITED STATES
2 ENVIRONMENTAL PROTECTION AGENCY
3 REGION IX
4 75 HAWTHORNE STREET
5 SAN FRANCISCO, CA 94105

** FILED **
03MAY2017 - 10:10AM
U.S.EPA - Region 09

6)
7 In the Matter of:) Docket No. TSCA-09-2017-0004
8 Simply Building, Inc.,) CONSENT AGREEMENT
9) AND FINAL ORDER
10 Respondent.) PURSUANT TO 40 C.F.R.
11) §§ 22.13 AND 22.18
12)
13)

14 I. CONSENT AGREEMENT

15 The United States Environmental Protection Agency, Region IX
16 ("EPA") and Simply Building, Inc. ("Respondent") agree to settle this
17 matter and consent to the entry of this Consent Agreement and Final
18 Order ("CAFO"), which simultaneously initiates and concludes this
19 matter in accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b).

20 A. AUTHORITY AND PARTIES

21 1. This is a civil administrative penalty action initiated
22 against Respondent pursuant to Section 16(a) of the Toxic Substances
23 Control Act ("TSCA"), 15 U.S.C § 2615(a), for violation of Section 409
24 15 U.S.C. § 2689, by failing to comply with Sections 402 and 406 of
25 TSCA, 15 U.S.C. §§ 2682 and 2686, and their implementing federal
26 regulations promulgated at 40 C.F.R. Part 745, Subpart E.

27 2. Complainant is the Director of the Enforcement Division, EPA
28 Region IX, who has been duly delegated the authority to bring this
action and to sign a consent agreement settling this action.

3. Respondent is a California corporation doing business at
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1 1521 Bayshore Highway, Burlingame, California.

2 B. APPLICABLE STATUTORY AND REGULATORY SECTIONS

3 4. Pursuant to Section 406(b) of TSCA, 15 U.S.C. § 2686(b), 40
4 C.F.R. Part 745, Subpart E requires a person who performs for
5 compensation a renovation of target housing and child-occupied
6 facilities to provide a lead hazard information pamphlet to the owner
7 and occupant before beginning the renovation.

8 5. Pursuant to Sections 402(a) and (c) of TSCA, 15 U.S.C. §§
9 2682(a) and (c), 40 C.F.R. Part 745, Subpart E provides requirements
10 for certification of individuals and firms engaged in lead-based paint
11 activities and work practice standards for renovation, repair, and
12 painting activities in target housing and child-occupied facilities.

13 6. "Target housing" means any housing constructed prior to 1978,
14 except housing for the elderly or persons with disabilities (unless
15 any child who is six years of age resides or is expected to reside in
16 such housing) or any 0-bedroom dwelling. Section 401 of TSCA, 15
17 U.S.C. § 2681.

18 7. "Person" means any natural or judicial person including any
19 individual, corporation, partnership, or association; any Indian
20 Tribe, State, or political subdivision thereof; any interstate body;
21 and any department, agency, or instrumentality of the Federal
22 Government. 40 C.F.R. § 745.83.

23 8. "Firm" means a company, partnership, corporation, sole
24 proprietorship, or individual doing business, association, or other
25 business entity; a Federal, State, Tribal, or local government agency;
26 or a nonprofit organization. 40 C.F.R. § 745.83.

27 9. "Renovation" means the modification of any existing structure,
28 or portion thereof, that results in the disturbance of painted

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1 surfaces, unless that activity is part of an abatement as defined by
2 40 C.F.R. § 745.233. The term "renovation" includes (but is not
3 limited to) the removal, modification or repair of painted surfaces
4 or painted components (e.g., modification of painted doors, surface
5 restoration, window repair, surface preparation activity (such as
6 sanding, scraping, or other such activities that may generate paint
7 dust); the removal of building components (e.g., walls, ceilings,
8 plumbing windows); weatherization projects (e.g., cutting holes in
9 painted surfaces to install blown-in insulation or to gain access to
10 attics planning thresholds to install weatherstripping), and interim
11 controls that disturb painted surfaces...The term "renovation" does
12 not include minor repair and maintenance activities. 40 C.F.R. §
13 745.83.

14 10. "Painted surface" means a component surface covered in
15 whole or in part with paint or other surface coatings. 40 C.F.R. §
16 745.83.

17 11. "Component or building component" means specific design or
18 structural elements or fixtures of a building or residential dwelling
19 that are distinguished from each other by form, function, and
20 location. These include, but are not limited to interior components
21 such as...windows and trim (including sashes, window heads, jambs,
22 sills or stools and troughs) ...and exterior components such
23 as...siding...windowsills or stools and troughs, casings, sashes
24 and wells. 40 C.F.R. § 745.83.

25 12. "Renovator" means any individual who either performs or
26 directs workers who perform renovations. A certified renovator is a
27 renovator who has successfully completed a renovator course accredited
28 by EPA or an EPA-authorized State or Tribal program. 40 C.F.R. §

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1 745.83.

2 13. Section 16(a) of TSCA, 15 U.S.C. § 2615(a), and the Civil
3 Monetary Penalty Inflation Adjustment Rule at 40 C.F.R. Part 19, which
4 implements the Federal Civil Penalties Inflation Adjustment Act of
5 1990, 28 U.S.C. § 2461, as amended, authorize civil penalties not to
6 exceed \$37,500 per day for each violation of Section 409 of TSCA, 15
7 U.S.C. § 2689, that occurred after December 6, 2013.

8 C. ALLEGATIONS

9 14. Respondent is a "person" as that term is defined at 40
10 C.F.R. § 745.83.

11 15. At all times relevant to this CAFO, Respondent is a "firm"
12 as that term is defined at 40 C.F.R. § 745.83.

13 16. On or about April 14, 2015, Respondent removed and replaced
14 the exterior siding and windows at a residential property located at
15 992 Portola Drive in San Francisco, California.

16 17. At all times relevant to this CAFO, the exterior siding and
17 windows at 992 Portola Drive in San Francisco, California were
18 "components or building components," as that term is defined at 40
19 C.F.R. § 745.83.

20 18. On or about April 14, 2015, Respondent performed a
21 "renovation," as that term is defined at 40 C.F.R. § 745.83 for
22 compensation at the residential property located at 992 Portola Drive
23 in San Francisco, California.

24 19. At all times relevant to this CAFO, the residential
25 property located at 992 Portola Drive in San Francisco, California was
26 "target housing," as that term is defined at 40 C.F.R. § 745.83.

27 20. Firms that perform renovations for compensation must apply
28 to EPA for certification to perform renovations. 40 C.F.R. § 745.89

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1 (a).

2 21. On or after April 22, 2010, no firm may perform a
3 renovation without certification from EPA under 40 C.F.R. § 745.89 in
4 target housing, unless the renovation is performed in target housing
5 that has been determined to be lead-free pursuant to 40 C.F.R. §
6 745.82(a). 40 C.F.R. § 745.81(a)(2)(ii).

7 22. At all times relevant to this CAFO, Respondent did not have
8 certification from EPA to perform the renovation for compensation at
9 target housing located at 992 Portola Drive in San Francisco,
10 California.

11 23. At all times relevant to this CAFO, the target housing
12 located at 992 Portola Drive in San Francisco, California had not been
13 determined to be lead-free pursuant to 40 C.F.R. § 745.82(a).

14 24. Respondent's performance of a renovation for compensation
15 at target housing located at 992 Portola Drive in San Francisco,
16 California without firm certification from EPA under 40 C.F.R. §
17 745.89(a) constitutes a violation of 40 C.F.R. § 745.81(a)(2)(ii)
18 and Section 409 of TSCA, 15 U.S.C. § 2689.

19 25. On or after July 6, 2010, all renovations must be performed
20 in accordance with the work practice standards in 40 C.F.R. § 745.85
21 and the associated recordkeeping requirements in 40 C.F.R. §
22 745.85(b)(1) and (b)(6) in target housing or child-occupied
23 facilities, unless the renovation qualified for the exception
24 identified in 40 C.F.R. § 745.82(a). 40 C.F.R. § 745.81(a)(4)(ii).

25 26. Firms must post signs clearly defining the work area and
26 warning occupants and other persons not involved in renovation
27 activities to remain outside the work area. To the extent
28 practicable, signs must be in the primary language of the occupants.

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1 Signs must be posted before beginning the renovation and must remain
2 in place and readable until the renovation and the post-renovation
3 cleaning verification have been completed. 40 C.F.R. § 745.85(a)(1).

4 27. At all times relevant to this CAFO, Respondent did not post
5 any signs in the work area at the renovation that Respondent performed
6 at 992 Portola Drive, San Francisco, California.

7 28. Respondent's failure to post signs defining the work area
8 and warning occupants and other persons not involved in renovation
9 activities to remain outside the work area; post signs in the primary
10 language of the occupants; and post signs before beginning the
11 renovation and keeping them in place and readable until the renovation
12 and the post-renovation cleaning verification was completed at the
13 renovation that Respondent performed at 992 Portola Drive in San
14 Francisco, California constitutes a violation of 40 C.F.R. §
15 745.85(a)(1) and Section 409 of TSCA, 15 U.S.C. § 2689.

16 29. Firms must ensure that doors within the work area that
17 would be used while the job is being performed are covered with
18 plastic sheeting or other impermeable material in a manner that allows
19 workers to pass through while confining the dust and debris to the
20 work area. 40 C.F.R. § 745.85(a)(2)(ii)(B).

21 30. At all times relevant to this CAFO, Respondent did not
22 ensure that doors within the work area were covered with plastic
23 sheeting or other impermeable material in a manner that allowed
24 workers to pass through while confining the dust and debris to the
25 work area during the renovation that Respondent performed at 992
26 Portola Drive, San Francisco, California.

27 31. Respondent's failure to cover doors with plastic sheeting
28 or other impermeable material in a manner that allowed workers to pass
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1 through while confining the dust and debris to the work area during
2 the renovation that Respondent performed at 992 Portola Drive in San
3 Francisco, California constitutes a violation of 40 C.F.R. §
4 745.85(a)(2)(ii)(B) and Section 409 of TSCA, 15 U.S.C. § 2689.

5 32. Firms must cover the ground with plastic sheeting or other
6 disposable impermeable material extending 10 feet beyond the perimeter
7 of surfaces undergoing renovation or a sufficient distance to collect
8 falling paint debris, whichever was greater, unless the property line
9 prevented 10 feet of such ground covering. 40 C.F.R. § 745.85(a)(2)
10 (ii)(C).

11 33. At all times relevant to this CAFO, Respondent did not
12 cover the ground with plastic sheeting or other disposable impermeable
13 material extending 10 feet beyond the perimeter of surfaces undergoing
14 renovation or a sufficient distance to collect falling paint debris
15 and the property line did not prevent 10 feet of ground covering.

16 34. Respondent's failure to cover the ground with plastic
17 sheeting or other disposable impermeable material extending 10 feet
18 beyond the perimeter of surfaces undergoing renovation or a
19 sufficient distance to collect falling paint debris at the renovation
20 that Respondent performed at 992 Portola Drive in San Francisco,
21 California constitutes a violation of 40 C.F.R. § 745.85(a)(2)(ii)(C)
22 and Section 409 of TSCA, 15 U.S.C. § 2689.

23 35. Firms performing renovations must retain documentation of
24 compliance with the requirements of § 745.85, including documentation
25 that a certified renovator was assigned to the project; that a
26 certified renovator provided on-the-job training for workers used on
27 the project; that a certified renovator performed or directed
28 workers who performed all of the tasks described in § 745.85(a); and
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1 that a certified renovator performed the post-renovation cleaning
2 verification described in § 745.85(b). 40 C.F.R. § 745.86(b)(6).

3 36. Respondent did not retain documentation that a certified
4 renovator was assigned to the project; that a certified renovator
5 provided on-the-job training for workers used on the project; that a
6 certified renovator performed or directed workers who performed all of
7 the tasks described in § 745.85(a); and that a certified renovator
8 performed the post-renovation cleaning verification described in §
9 745.85(b) for the renovation that Respondent performed at 992 Portola
10 Drive in San Francisco, California.

11 37. Respondent's failure to retain documentation that a
12 certified renovator was assigned to the project; that a certified
13 renovator provided on-the-job training for workers used on the
14 project; that a certified renovator performed or directed workers
15 who performed all of the tasks described in § 745.85(a); and that a
16 certified renovator performed the post-renovation cleaning
17 verification described in § 745.85(b) for the renovation that
18 Respondent performed at 992 Portola Drive in San Francisco, California
19 constitutes four (4) violations of 40 C.F.R. § 745.86(b)(6) and
20 Section 409 of TSCA, 15 U.S.C. § 2689.

21 38. Firms performing renovations must ensure that a certified
22 renovator is assigned to each renovation performed by the firm and
23 discharges all the certified renovator responsibilities identified in
24 § 745.90. 40 C.F.R. § 745.89(d)(2).

25 39. Respondent did not ensure that a certified renovator
26 discharged all of the certified renovator responsibilities identified
27 in § 745.90 for the renovation that Respondent performed at 992
28 Portola Drive in San Francisco, California.

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1 40. Respondent's failure to ensure that a certified renovator
2 discharged all of the certified renovator responsibilities identified
3 in § 745.90 for the renovation that Respondent performed at 992
4 Portola Drive in San Francisco, California constitutes a violation of
5 40 C.F.R. § 745.89 (d)(2) and Section 409 of TSCA, 15 U.S.C. § 2689.

6 D. RESPONDENT'S ADMISSIONS

7 41. In accordance with 40 C.F.R. § 22.18(b)(2) and for the
8 purpose of this proceeding, Respondent (i) admits that EPA has
9 jurisdiction over the subject matter of this CAFO and over Respondent;
10 (ii) neither admits nor denies the specific factual allegations
11 contained in Section I. C of this CAFO; (iii) consents to any and all
12 conditions specified in this CAFO and to the assessment of the civil
13 administrative penalty under Section I.E. of this CAFO; (iv) waives
14 any right to contest the allegations contained in Section I.C of this
15 CAFO; and (v) waives the right to appeal the proposed final order
16 contained in this CAFO.

17 E. CIVIL ADMINISTRATIVE PENALTY

18 42. Respondent agrees to the assessment of a penalty in the
19 amount of TWENTY-FOUR THOUSAND, ONE HUNDRED AND FIVE DOLLARS
20 (\$24,105) as final settlement of the civil claims against Respondent
21 arising under TSCA as alleged in Section I.C of this CAFO.

22 43. Respondent shall pay the assessed penalty no later than
23 thirty (30) days after the effective date of this CAFO. The assessed
24 penalty shall be paid by **certified or cashier's check**, payable to
25 "Treasurer, United States of America," or paid by one of the other
26 methods listed below and sent as follows:

1 Regular Mail:

2 U.S. Environmental Protection Agency
3 Fines and Penalties
4 Cincinnati Finance Center
5 PO Box 979077
6 St. Louis, MO 63197-9000

6 Wire Transfers:

7 Wire transfers must be sent directly to the Federal Reserve Bank in
8 New York City with the following information:

9 Federal Reserve Bank of New York
10 ABA = 021030004
11 Account = 68010727
12 SWIFT address = FRNYUS33
13 33 Liberty Street
14 New York, NY 10045
15 Field Tag 4200 of the Fedwire message should read "D 68010727
16 Environmental Protection Agency"

14 Overnight Mail:

15 U.S. Bank
16 1005 Convention Plaza
17 Mail Station SL-MO-C2GL
18 ATTN Box 979077
19 St. Louis, MO 63101

19 ACH (also known as REX or remittance express):

20 US Treasury REX/Cashlink ACH Receiver
21 ABA = 051036706
22 Account Number 310006, Environmental Protection Agency
23 CTX Format Transaction Code 22 - checking
24 Physical location of US Treasury Facility
25 5700 Rivertech Court
26 Riverdale, MD 20737
27 Remittance Express (REX): 1-866-234-5681

28
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1 On Line Payment:

2 This Payment option can be accessed from the information below:

3 www.pay.gov

4 Enter "sf01.1" in the search field

5 Open form and complete required fields

6 If clarification regarding a particular method of payment remittance
7 is needed, contact the EPA Cincinnati Finance Center at 513-487-2091.

8 Concurrently, a copy of the check or notification that the payment has
9 been made by one of the other methods listed above, including proof of
10 the date payment was made, shall be sent with a transmittal letter
11 to:

12 a) Regional Hearing Clerk (ORC-1)
13 Office of Regional Counsel
14 U.S. Environmental Protection Agency, Region IX
15 75 Hawthorne Street
16 San Francisco, California 94105

17 b) Christopher Rollins
18 Waste & Chemical Section (ENF-2-2)
19 Enforcement Division
20 U.S. Environmental Protection Agency, Region IX
21 75 Hawthorne Street
22 San Francisco, California 94105

23 44. Payment of the above civil administrative penalty shall not
24 be used by Respondent or any other person as a tax deduction from
25 Respondent's federal, state, or local taxes.

26 45. If Respondent fails to pay the assessed civil
27 administrative penalty specified in Paragraph 42 by the deadline
28 specified in Paragraph 43, then Respondent shall pay to EPA a
29 stipulated penalty of \$500 per day in addition to the assessed
30 penalty. Stipulated penalties shall accrue until such time as the
31 assessed penalty and all accrued stipulated penalties are paid and

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1 shall become due and payable upon written request by EPA. In
2 addition, failure to pay the civil administrative penalty by the
3 deadline specified in Paragraph 43 may lead to any or all of the
4 following actions:

5 a. The debt being referred to a credit reporting agency, a
6 collection agency, or to the Department of Justice for filing of a
7 collection action in the appropriate United States District Court. 40
8 C.F.R. §§ 13.13, 13.14, and 13.33. In any such collection action, the
9 validity, amount, and appropriateness of the assessed penalty and of
10 this CAFO shall not be subject to review.

11 b. The debt being collected by administrative offset (i.e., the
12 withholding of money payable by the United States to, or held by the
13 United States for, a person to satisfy the debt the person owes the
14 Government), which includes but is not limited to, referral to the
15 Internal Revenue Service for offset against income tax refunds. 40
16 C.F.R. Part 13, Subpart C and H.

17 c. EPA may (i) suspend or revoke Respondent's licenses or other
18 privileges; or (ii) suspend or disqualify Respondent from doing
19 business with EPA or engaging in program EPA sponsors or funds. 40
20 C.F.R. § 13.17.

21 d. In accordance with the Debt Collection Act of 1982 and 40
22 C.F.R. Part 13, interest, penalties charges, and administrative costs
23 will be assessed against the outstanding amount that Respondent owes
24 to EPA for Respondent's failure to pay the civil administrative
25 penalty by the deadline specified in Paragraph 43. Interest will be
26 assessed at an annual rate that is equal to the rate of current value
27 of funds to the United States Treasury (i.e., the Treasury tax and
28 loan account rate) as prescribed and published by the Secretary of the
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1 Treasury in the Federal Register and the Treasury Fiscal Requirements
2 Manual Bulletins. 40 C.F.R. § 13.11(a)(1). Penalty charges will be
3 assessed monthly at a rate of 6% per annum. 40 C.F.R. § 13.11(c).
4 Administrative costs for handling and collecting Respondent's overdue
5 debt will be based on either actual or average cost incurred, and will
6 include both direct and indirect costs. 40 C.F.R. § 13.11(b). In
7 addition, if this matter is referred to another department or agency
8 (e.g., the Department of Justice, the Internal Revenue Service), that
9 department or agency may assess its own administrative costs, in
10 addition to EPA's administrative costs, for handling and collecting
11 Respondent's overdue debt.

12 F. RESPONDENT'S CERTIFICATION

13 46. In executing this CAFO, Respondent certifies that it is now
14 In compliance with the federal regulations promulgated at 40 C.F.R.
15 Part 745, Subpart E.

16 G. RETENTION OF RIGHTS

17 47. In accordance with 40 C.F.R. § 22.18(c), this CAFO only
18 resolves Respondent's liability for federal civil penalties for the
19 violations and facts specifically alleged in Section I.C of this CAFO.
20 Nothing in this CAFO is intended to or shall be construed to resolve
21 (i) any civil liability for violations of any provision of any
22 federal, state, or local law, statute, regulation, rule, ordinance, or
23 permit not specifically alleged in Section I.C of this CAFO; or (ii)
24 any criminal liability. EPA specifically reserves any and all
25 authorities, rights, and remedies available to it (including, but not
26 limited to, injunctive or other equitable relief or criminal
27 sanctions) to address any violation of this CAFO or any violation not
28 specifically alleged in Section I.C of this CAFO.

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1 48. This CAFO does not exempt, relieve, modify, or affect in
2 any way Respondent's duty to comply with all applicable federal,
3 state, and local laws, regulations, rules, ordinances, and permits.

4 H. ATTORNEYS' FEES AND COSTS

5 49. Each party shall bear its own attorneys' fees, costs, and
6 disbursements incurred in this proceeding.

7 I. EFFECTIVE DATE

8 50. In accordance with 40 C.F.R. §§ 22.18(b)(3) and 22.31(b),
9 this CAFO shall be effective on the date that the final order
10 contained in this CAFO, having been approved and issued by either the
11 Regional Judicial Officer or Regional Administrator, is filed.

12 J. BINDING EFFECT

13 51. The undersigned representative of Complainant and the
14 undersigned representative of Respondent each certifies that he or she
15 is fully authorized to enter into the terms and conditions of this
16 CAFO and to bind the party he or she represents to this CAFO.

17 52. The provisions of this CAFO shall apply to and be binding
18 upon Respondent and its officers, directors, employees, agents,
19 trustees, servants, authorized representatives, successors, and
20 assigns.

1 FOR RESPONDENT, SIMPLY BUILDING, INC.

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4/17/2017



5 DATE

Kiley Ayos
President
Simply Building, Inc.

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10 FOR COMPLAINANT, U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX

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4/28/17



14 DATE

Kathleen H. Johnson
Director
Enforcement Division
U.S. ENVIRONMENTAL PROTECTION AGENCY,
REGION IX

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1 II. FINAL ORDER

2 Complainant and Respondent, having entered into the foregoing
3 Consent Agreement,

4 IT IS HEREBY ORDERED that this CAFO (Docket No. TSCA-09-2017-
5 0004 be entered, and that Respondent shall pay a civil
6 administrative penalty in the amount of TWENTY-FOUR THOUSAND, ONE
7 HUNDRED AND FIVE DOLLARS (\$24,105) and comply with the terms
8 and conditions set forth in the Consent Agreement. This Consent
9 Agreement and Final Order shall become effective upon filing.

10
11
12 05/02/17

13 DATE

14 
15 STEVEN L. JAWGIEL
16 Regional Judicial Officer
17 U.S. Environmental Protection Agency,
18 Region IX
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CERTIFICATE OF SERVICE

I certify that the original of the fully executed Consent Agreement and Final Order in the matter of **Simply Building, Inc. (Docket #: TSCA-09-2017-0004)** was filed with the Regional Hearing Clerk, U.S. EPA, Region IX, 75 Hawthorne Street, San Francisco, CA 94105, and that a true and correct copy of the same was sent to the following parties:


A copy was mailed via CERTIFIED MAIL to:

Mr. Kiley Ayoso, President
Simply Building, Inc.
97 Menlo Avenue
Daly City, CA 4015

CERTIFIED MAIL NUMBER: 7016 1370 0000 2234 8466

And additional copy was hand-delivered to the following U.S. EPA case attorney:

Azure' De M. Wilkins, Esq.
Office of Regional Counsel
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105


Regional Hearing Clerk
U.S. EPA, Region IX

May 3, 2017
Date