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**ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In re Cargill, Incorporated

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) Docket No. CAA-2025-8714
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)

FINAL ORDER

Decided July 30, 2026

Before Environmental Appeals Judges Aaron P. Avila and Ammie Roseman-Orr.

Order of the Board by Judge Avila:

Pursuant to 40 C.F.R. § 22.18(b)-(c) of EPA's Consolidated Rules of Practice, the attached Consent Agreement resolving this matter is incorporated by reference into this Final Order and is hereby ratified.

The Respondent is ORDERED to comply with all terms of the Consent Agreement, effective immediately.

So ordered.

**ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

IN THE MATTER OF:

CARGILL, INCORPORATED

Respondent.

Docket No. CAA-2025-8714

CONSENT AGREEMENT

I. PRELIMINARY STATEMENT

1. This is a civil administrative penalty assessment proceeding instituted under Sections 205(c)(1) and 211(d)(1) of the Clean Air Act (CAA), 42 U.S.C. §§ 7524(c)(1) and 7545(d)(1). The issuance of this Consent Agreement and attached Final Order (CAFO) simultaneously commences and concludes this proceeding. 40 C.F.R. §§ 22.13(b) and 22.18(b)(2)-(3).
2. The Complainant in this matter is the United States Environmental Protection Agency (EPA). The authority to sign Consent Agreements memorializing settlements between the EPA and respondents under Section 205(c) of the CAA, 42 U.S.C. § 7524(c), has been delegated to the Assistant Administrator of the Office of Enforcement and Compliance Assurance. This authority has been redelegated to the Director of the Office of Civil Enforcement, who has further redelegated the authority to the Director of the Air Enforcement Division. EPA Delegation 7-6-A.
3. The Respondent in this matter is Cargill, Incorporated (Cargill), a corporation organized under the laws of Delaware with its corporate headquarters located at 15407 McGinty

Road W, Wayzata, Minnesota 55391. As relevant here, the Respondent operates a fuel manufacturing facility located in Iowa Falls, Iowa that produces biodiesel.

4. The Complainant and Respondent (collectively, the Parties), having agreed to settle this action, consent to the issuance of the attached Final Order ratifying this Consent Agreement before taking testimony and without adjudication of any issues of law or fact herein, and agree to comply with the terms of this Consent Agreement and the attached Final Order.

II. JURISDICTION

5. This Consent Agreement is entered into under Sections 205(c)(1) and 211(d)(1) of the CAA, 42 U.S.C. §§ 7524(c)(1) and 7545(d)(1), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits*, as codified at 40 C.F.R. Part 22 (Consolidated Rules).
6. The EPA may administratively assess a civil penalty if the penalty sought is less than \$472,901. 42 U.S.C. §§ 7524(c)(1) and 7545(d)(1); 40 C.F.R. § 19.4.
7. The Environmental Appeals Board is authorized to ratify this Consent Agreement memorializing the settlement between the Parties in a Final Order. 40 C.F.R. §§ 22.4(a)(1) and 22.18(b); EPA Delegation 7-41-C.
8. The Consolidated Rules provide that where the parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding may be simultaneously commenced and concluded by the issuance of a Consent Agreement and Final Order. 40 C.F.R. §§ 22.13(b) and 22.18(b)(2)-(3).

III. GOVERNING LAW

9. This proceeding arises under Part A of Title II of the CAA, Sections 202-219, 42 U.S.C. §§ 7521–7554, and its implementing regulations (40 C.F.R. Part 1090). The CAA and its implementing regulations aim to reduce emissions from mobile sources of air pollution by, among other things, reducing emissions from fuel used in motor vehicles, nonroad vehicles, and engines, and ensuring that fuel used in motor vehicles, nonroad vehicles, and engines does not harm the emissions control technology necessary to meet emissions standards. The Alleged Violations of Law, stated below, relate to sampling and testing requirements that enhance the EPA’s ability to ensure that biodiesel sold in the United States meets applicable standards. A summary of the law and regulations that govern these allegations follows below.
10. Definitions:
- (a) “Biodiesel” means a diesel fuel composed of mono-alkyl esters made from nonpetroleum feedstocks. 40 C.F.R. § 1090.80.
 - (b) “Compliance period” means the calendar year (January 1 through December 31). 40 C.F.R. § 1090.80.
 - (c) “Diesel fuel” means any of the following: (1) Any fuel commonly or commercially known as diesel fuel; (2) Any fuel (including nonpetroleum diesel fuel or a fuel blend that contains nonpetroleum diesel fuel) that is intended or used to power a vehicle or engine that is designed to operate using diesel fuel; (3) Any fuel that conforms to the specifications of ASTM D975 (incorporated by reference in 40 C.F.R. § 1090.95) and is made available for use in a vehicle or engine designed to operate using diesel fuel. 40 C.F.R. § 1090.80.

(d) “Diesel fuel manufacturer” means a fuel manufacturer that owns, leases, operates, controls, or supervises a diesel fuel manufacturing facility . 40

C.F.R. § 1090.80.

(e) “Fuel manufacturer” means any person that owns, leases, operates, controls, or supervises a fuel manufacturing facility. Fuel manufacturers include refiners, importers, blending manufacturers, and transmix processors. 40

C.F.R. § 1090.80.

(f) “Fuel manufacturing facility” means any facility where fuels are produced, imported, or recertified. Fuel manufacturing facilities include refineries, fuel blending facilities, transmix processing facilities, import facilities, and any facility where fuel is recertified. 40 C.F.R. § 1090.80.

(g) “Voluntary consensus standards body (VCSB)” means an organization that follows consistent protocols to adopt standards reflecting a wide range of input from interested parties. ASTM International and the International Organization for Standardization are examples of VCSB organizations. 40

C.F.R. § 1090.80.

11. Section 211 of the CAA, 42 U.S.C. § 7545, and its implementing regulations contain numerous provisions to ensure that only compliant fuels are produced and distributed in the United States.
12. Under Section 211(c)(1) of the CAA, 42 U.S.C. § 7545(c)(1), the EPA may adopt a fuel control if: (a) the emission products of the fuel cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare; or (b) the emission products of the fuel will significantly impair emissions control systems in general use or

emissions control systems that would be in general use were the fuel control to be adopted.

13. Pursuant to its authority under Section 211(c)(1) of the CAA, 42 U.S.C. § 7545(c)(1), the EPA promulgated regulations that require fuel manufacturers to perform testing as needed to certify fuel. *See* 40 C.F.R. § 1090.1310.
14. Fuel manufacturers must measure specified fuel parameters, including sulfur, to demonstrate compliance with standards. To measure sulfur, laboratories may use either the referee procedure named in 40 C.F.R. § 1090.1360(d) or an alternative procedure that meets specified performance criteria. *See* 40 C.F.R. §§ 1090.1350 and 1090.1360.
15. Different performance criteria apply to alternative procedures depending on whether they have been adopted by a VCSB. A published procedure is considered non-VCSB for testing with fuel parameters that fall outside the range of values covered in the research report of the ASTM D6708 assessment comparing candidate alternative procedures to the referee procedure specified in 40 C.F.R. § 1090.1360(d). 40 C.F.R. § 1090.1360(c)(3)(iii). Certification testing with non-VCSB procedures requires advance approval by the EPA. *See* 40 C.F.R. §§ 1090.1360(c)(3) and 1090.1365.
16. Pursuant to 40 C.F.R. § 1090.1700, it is a violation for a fuel manufacturer to test the sulfur content of fuel using an unqualified test method. *See* 40 C.F.R. §§ 1090.1360 and 1090.1365. Pursuant to 40 C.F.R. § 1090.1715(a), any person who violates 40 C.F.R. §§ 1090.1360 and 1090.1365 is liable for the violation.
17. Any person who, after November 2, 2015, where penalties are assessed on or after January 8, 2025, violates the regulations prescribed under Section 211(c) of the CAA, 42 U.S.C. § 7545(c), including the sulfur test method requirements at 40 C.F.R. Part 1090, is

subject to a civil penalty up to \$59,114 per day per violation, plus the economic benefit or savings resulting from each violation. 42 U.S.C. § 7545(d)(1); 40 C.F.R. § 19.4. Such penalties are assessed in accordance with Sections 205(b) and (c) of the CAA, 42 U.S.C. §§ 7524(b) and (c). 42 U.S.C. § 7545(d)(1).

IV. STIPULATED FACTS

18. On September 13 and 14, 2023, the EPA conducted an on-site inspection of Cargill's Iowa Falls, Iowa, facility for compliance with CAA § 211 and the fuels regulations promulgated under 40 C.F.R. Parts 80 and 1090.
19. Respondent is a "person" as defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
20. Respondent is a "fuel manufacturer" as defined in 40 C.F.R. § 1090.80.
21. Cargill owns and operates a "fuel manufacturing facility," as defined in 40 C.F.R. § 1090.80, in Iowa Falls, Iowa that produces biodiesel.
22. From March 1, 2023, through November 7, 2023, Respondent's laboratory used ASTM D4951 as its sole sulfur test method for every batch of biodiesel produced at its Iowa Falls facility. Although the Respondent provided data indicating that the sulfur content did not exceed the maximum 15 parts per million ("15 ppm") concentration authorized by 40 C.F.R. § 1090.305 during this time, ASTM D4951 is considered a non-VCSB procedure and would require advanced EPA approval to use for certification testing purposes.
23. From December 16, 2023, through March 7, 2024, Respondent's laboratory used ASTM D4951 as a preliminary method for testing the sulfur content of every batch of its biodiesel produced at its Iowa Falls facility and used an independent third-party laboratory to verify and confirm the results using ASTM D5453, a VCSB procedure

approved by EPA for use in certification testing. ASTM D4951 is considered a non-VCSB procedure and would require advanced EPA approval to use for certification testing purposes. Data that the Respondent provided to EPA indicates that the biodiesel samples analyzed during this time were below the maximum 15 ppm concentration authorized by 40 C.F.R. § 1090.305.

V. ALLEGED VIOLATIONS OF LAW

24. During ten months of the 2023 compliance period and three months of the 2024 compliance period, Respondent tested the sulfur content of biodiesel produced at its Iowa Falls facility using an unqualified test method, in violation of 40 C.F.R. §§ 1090.1360 and 1090.1365.

VI. TERMS OF AGREEMENT

25. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent: admits that the EPA has jurisdiction over this matter as stated above; admits to the stipulated facts stated above; neither admits nor denies the alleged violations of law stated above; consents to the assessment of a civil penalty as stated below; consents to any conditions specified in this Consent Agreement; waives any right to contest the alleged violations of law; and waives its rights to appeal the Final Order ratifying this Consent Agreement.
26. By signing this Consent Agreement, respondent waives any rights or defenses that respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the Final Order ratifying the Consent Agreement.
27. For the purpose of this proceeding, Respondent:

- (a) Agrees that this Consent Agreement states a claim upon which relief may be granted against Respondent;
- (b) Waives any and all remedies, claims for relief, and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this Consent Agreement;
- (c) Waives any rights it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to enforce this Consent Agreement or Final Order, or both, and to seek an additional penalty for such noncompliance, and agrees that federal law will govern in any such civil action;
- (d) Consents to personal jurisdiction in any action to enforce this Consent Agreement or Final Order, or both, in the United States District Court for the District of Columbia;
- (e) Agrees that it may not delegate duties under this Consent Agreement to any other party without the written consent of the EPA, which may be granted or withheld at the EPA's discretion. If the EPA so consents, the Consent Agreement is binding on the party or parties to whom the duties are delegated;
- (f) Acknowledges that this Consent Agreement constitutes an enforcement action for purposes of considering Respondent's compliance history in any subsequent enforcement actions;
- (g) Acknowledges that this Consent Agreement and attached Final Order will be available to the public and agrees that it does not contain any confidential business information or personally identifiable information;

- (h) Acknowledges that its tax identification number may be used for collecting or reporting any delinquent monetary obligation arising from this Consent Agreement (*see* 31 U.S.C. § 7701);
 - (i) Certifies the information it has supplied concerning this matter was at the time of submission and to the best of its knowledge, true, accurate, and complete; and
 - (j) Acknowledges there are significant penalties for knowingly submitting false, fictitious, or fraudulent information, including the possibility of fines and imprisonment (*see* 18 U.S.C. § 1001).
28. For purposes of this proceeding, the Parties each agree that:
- (a) This Consent Agreement constitutes the entire agreement and understanding of the Parties and supersedes any prior agreements or understandings, whether written or oral, among the Parties with respect to the subject matter of this Consent Agreement;
 - (b) This Consent Agreement may be signed in any number of counterparts, each of which will be deemed an original and, when taken together, constitute one agreement; the counterparts are binding on each of the Parties individually as fully and completely as if the Parties had signed one single instrument, so that the rights and liabilities of the Parties will be unaffected by the failure of any of the undersigned to execute any or all of the counterparts; any signature page and any copy of a signed signature page may be detached from any counterpart and attached to any other counterpart of this Consent Agreement;

- (c) Its undersigned representative is fully authorized by the Party whom he or she represents to bind that Party to this Consent Agreement and to execute it on behalf of that Party;
- (d) Each Party's obligations under this Consent Agreement and attached Final Order constitute sufficient consideration for the other Party's obligations under this Consent Agreement and attached Final Order; and
- (e) Each Party will bear its own costs and attorney fees in the action resolved by this Consent Agreement and attached Final Order.

VII. TERMS OF PAYMENT

- 29. Respondent agrees to pay a civil penalty in the amount of \$203,555 (Assessed Penalty) within thirty (30) calendar days after the date the Final Order ratifying this Agreement is filed with the Clerk of the Environmental Appeals Board (Filing Date).
- 30. Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>.
- 31. When making a payment, Respondent shall:
 - (a) Identify every payment with Respondent's name and the docket number of this Agreement, Docket No. CAA-2025-8714,
 - (b) Concurrently with any payment or within 24 hours of any payment, Respondent shall serve proof of such payment to the following persons:

Tommie Madison, Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1201 Constitution Ave. NW

WJC East Building, Room 3332
Washington, DC 20004
Clerk_EAB@epa.gov

Alexandra Guy, Physical Scientist
U.S. Environmental Protection Agency
1595 Wynkoop St., Room 7262
Denver, CO 80202
Guy.Alexandra@epa.gov

and

U.S. Environmental Protection Agency
Cincinnati Finance Division
Via electronic mail to:
CINWD_AcctsReceivable@epa.gov

- “Proof of payment” means, as applicable, a copy of the electronic check, confirmation of credit card or debit card payment, or confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to the EPA requirements, in the amount due, and identified with Docket No. CAA-2025-8714 and Respondent’s name.
32. Interest, Charges, and Penalties on Late Payments. Pursuant to 42 U.S.C. § 7524(c)(6), 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay the full amount of the Assessed Penalty per this Agreement, the EPA is authorized to recover, in addition to the amount of the unpaid Assessed Penalty, the following amounts.
- (a) Interest. Interest begins to accrue from the Filing Date. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. Per 42 U.S.C. § 7524(c)(6), interest will be assessed pursuant to 26 U.S.C. § 6621(a)(2), that is the Internal Revenue Service

(“IRS”) standard underpayment rate, equal to the Federal short-term rate plus three (3) percentage points.

(b) Handling Charges. The United States’ enforcement expenses including, but not limited to, attorneys’ fees and costs of collection proceedings.

(c) Late Payment Penalty. A ten percent (10%) quarterly non-payment penalty.

33. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Agreement, the EPA may take additional actions. Such actions the EPA may take include, but are not limited to, the following.

(a) Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R. §§ 13.13 and 13.14.

(b) Collect the debt by administrative offset (i.e., withholding the money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the IRS for offset against income tax refunds, per 40 C.F.R. Part 13, Subparts C and H.

(c) Suspend or revoke Respondent’s licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, per 40 C.F.R. § 13.17.

(d) Request that the Attorney General bring a civil action in the appropriate district court to recover the full remaining balance of the Assessed Penalty, in addition to interest and the amounts described above, per 42 U.S.C. § 7524(c)(6). In any such

action, the validity, amount, and appropriateness of the Assessed Penalty shall not be subject to review.

34. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.
35. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Agreement shall not be deductible for purposes of federal taxes.

VIII. EFFECT OF CONSENT AGREEMENT AND ATTACHED FINAL ORDER

36. In accordance with 40 C.F.R. § 22.18(c), Respondent's full compliance with this Consent Agreement shall only resolve Respondent's liability for federal civil penalties for the violations and facts specifically alleged above.
37. This Consent Agreement and attached Final Order apply to and are binding on the Parties. Successors and assigns of Respondent are also bound if they are owned, in whole or in part, directly or indirectly, or otherwise controlled by Respondent. Nothing in the previous sentence adversely affects any right of the Complainant under applicable law to assert successor or assignee liability against Respondent's successor or assignee.
38. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, the EPA is required to annually send to the IRS a completed IRS Form 1098-F ("Fines, Penalties, and Other Amounts") with respect to any court order or settlement agreement (including administrative settlements) that require a payor to pay an aggregate amount that the EPA reasonably believes will be equal to, or in excess of, \$50,000 for the payor's violation of any law or the investigation or inquiry into the payor's potential violation of any law,

including amounts paid for “restitution or remediation of property” or to come “into compliance with a law.” The EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (i.e., a copy of IRS Form 1098-F). Respondent’s failure to comply with providing IRS Form W-9 or Tax Identification Number (“TIN”), as described below, may subject Respondent to a penalty, per 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1. To provide EPA with sufficient information to enable it to fulfill these obligations, Respondent shall complete the following actions as applicable.

- (a) Respondent shall complete an IRS Form W-9 (“Request for Taxpayer Identification Number and Certification”), which is available at <https://www.irs.gov/pub/irspdf/fw9.pdf>.
- (b) Respondent shall therein certify that its completed IRS Form W-9 includes Respondent’s correct TIN or that Respondent has applied and is waiting for issuance of a TIN.
- (c) Respondent shall email its completed Form W-9 to the EPA’s Cincinnati Finance Division at CINWD_AcctsReceivable@epa.gov on or before the date that Respondent’s penalty payment is due, pursuant to Paragraph 29 of the CAFO, or within seven (7) days should the order become effective between December 15 and December 31 of the calendar year. The EPA recommends encrypting IRS Form W-9 email correspondence.
- (d) In the event that Respondent has certified in its completed IRS Form W-9 that it does not yet have a TIN but has applied for a TIN, Respondent shall provide the

EPA's Cincinnati Finance Division with Respondent's TIN, via email, within five (5) days of Respondent's receipt of a TIN issued by the IRS.

39. This Consent Agreement shall not confer any rights or obligations upon any person other than the Parties and shall not be enforceable by any other person except the Parties hereto.
40. Nothing in this Consent Agreement relieves Respondent of the duty to comply with all applicable provisions of the CAA or other federal, state, or local laws or statutes, or restricts the EPA's authority to seek compliance with any applicable laws or regulations, nor will it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit.
41. Nothing in this Consent Agreement shall be construed to limit the power of the Complainant to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to public health, welfare, or the environment.
42. Any violation of the Final Order issued by the Environmental Appeals Board in this matter may result in a civil judicial action to collect the civil penalty as provided in Section 205(c)(6) of the CAA, 42 U.S.C. § 7524(c)(6). The EPA may use any information submitted under the Consent Agreement and attached Final Order in an administrative, civil judicial, or criminal action.
43. The EPA reserves the right to revoke this Consent Agreement and accompanying Assessed Penalty if, and to the extent the EPA finds, after signing this Consent Agreement that any information provided by Respondent was or is materially false or inaccurate, and the EPA reserves the right to pursue, assess, and enforce legal and

equitable remedies for the Alleged Violations of Law. The EPA will give Respondent written notice of such termination, which will be effective upon mailing.

44. The Parties agree to submit this Consent Agreement to the Environmental Appeals Board with a request that it be ratified and incorporated into the attached Final Order.
45. The Parties agree to issuance of the attached Final Order. Upon filing of the Consent Agreement and attached Final Order with the Environmental Appeals Board, the EPA will transmit a copy of the filed Consent Agreement and Final Order to the Respondent. This Consent Agreement and attached Final Order will become effective after issuance of the Final Order by the Environmental Appeals Board and filing with the Hearing Clerk.

The foregoing Consent Agreement, In the Matter of: Cargill, Incorporated, Docket No. CAA-2025-8714, is Hereby Stipulated, Agreed, and Approved for Ratification.

For Cargill, Incorporated:

A handwritten signature in black ink, appearing to read "Pat Woerner", is written over a horizontal line.

Pat Woerner
Senior Director, Biodiesel Commercial
Cargill, Incorporated
15407 McGinty Road West, MS 20
Wayzata, MN 55391

Date 7/22/26

The foregoing Consent Agreement, In the Matter of: Cargill, Incorporated, Docket No. CAA-2025-8714, is Hereby Stipulated, Agreed, and Approved for Ratification.

For Complainant:

MEETU KAUL

Digitally signed by MEETU KAUL
Date: 2026.07.23 15:13:36
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Ms. Meetu Kaul, Director (Acting)
Air Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (MC-2242A)
Washington, DC 20460

LORRAINE BAER

Digitally signed by LORRAINE
BAER
Date: 2026.07.23 14:39:17 -04'00'

Lorraine Baer
Attorney-Adviser
Fuels Enforcement Branch
Air Enforcement Division
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

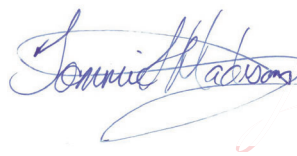
CERTIFICATE OF SERVICE

I certify that copies of the foregoing Consent Agreement and Final Order in the matter of *Cargill, Incorporated*, Docket No. CAA-2025-8714, were sent to the following persons on July 30, 2026, in the manner indicated.

By E-mail:

Gina Young
Managing Assistant General Counsel
Cargill, Incorporated
Email: gina_young@cargill.com

Lorraine Baer
Air Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance
Assurance
E-mail: Baer.Lorraine@epa.gov



Digitally signed by
TOMMIE MADISON
Date: 2026.07.30
13:00:05 -04'00'

Tommie Madison
Clerk of the Board