



SUPPLEMENTAL ENVIRONMENTAL PROJECTS (SEPs) FISCAL YEAR 2002 ALPHABETICAL LISTING

U.S. EPA REGION 5 - Office of Regional Counsel

(An electronic version of this report is available at: <http://www.epa.gov/region5/orc/reports.htm>)

Introduction:

What are SEPs?

EPA defines SEPs as environmentally beneficial projects which a defendant/respondent agrees to undertake in settlement of an enforcement action, but which the defendant/respondent is not otherwise legally required to perform. On April 10, 1998, EPA issued its final SEP Policy (available at: <http://www.epa.gov/compliance/civil/seps/>), which sets forth, among other things, uses of SEPs, categories of SEPs, and legal guidelines for SEPs.

SEPs may not be appropriate in settlement of all cases, but they are an important part of EPA's enforcement program. While penalties play an important role in environmental protection by deterring violations and creating a level playing field, SEPs can play an additional role in securing significant environmental or public health protection and improvements. SEPs bring regulated entities above and beyond mere compliance with federal environmental laws. Also, a SEP may be particularly appropriate to further the objectives in the statutes EPA administers and to achieve other policy goals, including promoting pollution prevention and environmental justice. As a general rule, the net costs to be incurred by a violator in performing a SEP may be considered as one factor in determining an appropriate settlement amount. Thus, in some instances, a cash penalty may be lowered if the violator chooses to perform an acceptable SEP.

EPA encourages SEPs that fit into at least one of the following eight categories: 1) Public Health; 2) Pollution Prevention; 3) Pollution Reduction; 4) Environmental Restoration and Protection; 5) Emergency Planning and Preparedness; 6) Assessments and Audits; 7) Environmental Compliance Promotion; and 8) Other Types of Projects that have environment merit but do not fit within the categories listed above. Also, SEPs must be related to the alleged violation. Once a SEP is approved and agreed upon, EPA does not manage the SEP or control the money for the project, but does provide oversight to ensure that the company performs the SEP as agreed.

For a more complete description of EPA's SEP program please visit Region 5 ORC's SEP description Web page at: <http://www.epa.gov/region5/orc/annualreports/sepdescr.htm>.

ORC's SEP Case Lists

Below you will find two comprehensive, descriptive lists of all Region 5 enforcement cases concluded in Fiscal Year 2002 that include SEPs as part of the settlement agreement. The first list orders the cases alphabetically; the second list orders the cases by statute.

A few important notes concerning the content and format of these lists will help you, the reader, better understand the information the lists present. For each case, the lists provide: 1) the name and address of the Defendant or Respondent (the term "Respondent" refers to the party to whom an administrative order was issued or an administrative complaint was served; the term "Defendant" refers to the party in a civil judicial lawsuit against whom relief is sought); 2) the enforcement action identifier number, which is the number the EPA uses to identify the case; 3) the type of SEP, i.e. Pollution Prevention, Pollution Reduction . . . etc., see SEP categories above; 4) the SEP description; 5) the value of the SEP; 6) the applicable statute; 7) the type of order, i.e. civil judicial or administrative; 8) the date of the order; 9) the original and final penalty; 10) the cost of the injunctive relief; and 11) the Quantitative Reductions (estimated), which indicate the estimated amount of pollutant projected to be reduced, eliminated or prevented as a result of the SEP.

As mentioned above, because EPA's SEP policy provides penalty mitigation incentives in those cases involving both a SEP and a monetary penalty, it is not uncommon to find that the penalty has been reduced upon the successful negotiation of the SEP. For this reason, both the original and the final penalties are provided for those cases that include a penalty.

It is also worth noting that this report simply describes the SEP that the Respondent or Defendant agreed to undertake as part of the settlement, it does not indicate whether the SEP has been completed. Accordingly, the "Value of SEP" number may not reflect the actual cost of the SEP; rather, this number represents the projected cost value of the SEP at the time of settlement.

For more information about Region 5 Office of Regional Counsel's FY 2002 end-of-year reports, go to: <http://www.epa.gov/region5/orc/reports.htm>.

Alphabetical Listing

**Aluminum Company of America, Inc. (ALCOA)
3131 E. Main St.
Lafayette, IN**

Enforcement Action Identifier:	05-1998-0638
Attorney/Program Contacts:	William Clune/Sangsook Choi
Type of SEP:	Pollution Prevention/In-Process Recycling
SEP Description:	ALCOA will develop and implement a series of water reduction projects that will reduce the use of process water from several operations.
Value of SEP:	\$2,000,000
Statute:	Clean Water Act
Type of Order:	Consent Decree
Date of Order:	03/28/2002
Original/Final Penalty:	\$550,000/\$550,000
Cost of Injunctive Relief:	\$850,000
Quantitative Reductions (estimated amount):	N/A

Babcock Fuels, Inc.
6800 W. 133rd Ave.
Cedar Lake, IN

Enforcement Action Identifier: 05-2001-0336
Attorney/Program Contacts: Tamara Carnovsky/Sandra Siler
Type of SEP: Other Program Specific SEP
SEP Description: Babcock Fuels will buy and install an automatic tank gauging system (ATG).
Value of SEP: \$11,410
Statute: Resource Conservation and Recovery Act
Type of Order: Administrative Penalty Order
Date of Order: 05/10/2002
Original/Final Penalty: \$92,528/\$37,136
Cost of Injunctive Relief: \$11,410
Quantitative Reductions (estimated amount): N/A

Detroit Lakes, City Of
106 E. Holmes St.
Detroit Lakes, MN

Enforcement Action Identifier: 05-2002-0127
Attorney/Program Contacts: Deirdre Tanaka/Eloise Hahn
Type of SEP: Environmental Restoration and Protection; Pollution Prevention/Process-Procedure Modification; Pollution Reduction; Public Health
SEP Description: Not available
Value of SEP: \$32,000
Statute: Clean Water Act
Type of Order: Administrative Penalty Order
Date of Order: 11/20/2001
Original/Final Penalty: \$18,900/\$2,000
Cost of Injunctive Relief: \$34,000
Quantitative Reductions (estimated amount): N/A

Dynachem, Inc.
P. O. BOX 19, Maple Grove Road
Georgetown, IL

Enforcement Action Identifier: 05-2001-0568
Attorney/Program Contacts: Kathleen Schnieders/Randa Bishlawi
Type of SEP: Pollution Prevention/Improved Housekeeping/O&M, Training, Inventory Control
SEP Description: Dynachem purchased an additional state of the art volatile organic compound (VOC) leak detection monitor to detect VOC leaks.
Value of SEP: \$5,679
Statute: Clean Air Act

Type of Order: Administrative Penalty Order
Date of Order: 12/21/2001
Original/Final Penalty: \$8,296/\$5,000
Cost of Injunctive Relief: \$1,000
Quantitative Reductions (estimated amount):N/A

The Elco Corporation
1000 Belt Line St.
Cleveland, OH

Enforcement Action Identifier: 05-2001-0473
Attorney/Program Contacts: Jeff Cahn/James Entzminger
Type of SEP: Pollution Prevention/Equipment-Technology Modification
SEP Description: The Elco Corporation will build a secondary containment structure around their acid storage tanks and they will move their hydrochloric acid scrubbers into the containment area. This will prevent any acid spills from entering the sewer system and the environment.

Value of SEP: \$30,575
Statute: Emergency Planning & Community Right-To-Know Act

Type of Order: Administrative Penalty Order
Date of Order: 04/29/2002
Original/Final Penalty: \$35,065/\$5,098
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

Foremost Farms USA
501 S. Pine NA
Reedsburg, WI

Enforcement Action Identifier; 05-2002-1017
Attorney/Program Contacts: Richard Wagner/Ruth McNamara
Type of SEP: Pollution Reduction
SEP Description: Foremost Farms will install emergency shut-off valves via remote control and ammonia leak detectors at several of their Wisconsin facilities. These valves and sensors will detect the presence of ammonia signaling alarms and warning light, which will alert plant personnel of a release.

Value of SEP: \$107,133
Statute: Emergency Planning & Community Right-To-Know Act

Type of Order: Administrative Penalty Order
Date of Order: 09/26/2002
Original/Final Penalty: \$140,051/\$24,106

Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

Gerken Materials

11330 Airport Highway, Swanton, OH
1180 Plasterbed Road, Port Clinton, OH
15203 S. Telegraph, Monroe, MI
26 East Kibler Street, Bluffton, OH
310 Quarry Drive, Bluffton, OH
3434 Centennial Rd., Sylvania, OH
600 S. River Rd. Waterville, OH
6126 S. Main, West Millgrove, OH
7751 North Township Road 82, Flat Rock, OH
8116 Billing Rd. Castalia, OH
9-051 US Route 24, Napoleon, OH
P.O. Box 627, Custar OH

Enforcement Action Identifier: 05-2003-0234
Attorney/Program Contacts: Cynthia King/Julie Monahan
Type of SEP: Assessments and Audits
SEP Description: Gerken Materials will:
1) implement a compliance recordkeeping program;
2) perform a voluntary air compliance audit of their asphalt and aggregate facilities;
3) implement the Sylvania paving project, which entails paving 16,000 square feet at the Sylvania, Ohio facility;
4) purchase and implement with training, a land combustion portable efficiency analyzer at their Napoleon, Ottawa, West Milgrove, Custar, and Bloomville, Ohio facilities; and
5) purchase, install, and maintain a blue smoke vent condenser for 1.2 million gallon liquid asphaltic concrete bulk storage tank at the Bluffton, Ohio facility.
Value of SEP: \$0;
\$108,164;
\$0;
\$0;
\$0
Statute: Clean Air Act
Type of Order: Administrative Penalty Order
Date of Order: 09/23/2002
Original/Final Penalty: \$90,470/\$90,470
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

Indianapolis Water Company
7601 W. 56th St.
Indianapolis, IN

Enforcement Action Identifier: 05-2001-0433
Attorney/Program Contacts: Tamara Carnovsky/Ruth McNamara
Type of SEP: Pollution Reduction
SEP Description: Indianapolis Water Company has committed to construct a containment area around the perimeter of the site with an impervious concrete base. This containment area will eliminate the possibility of another hazardous substance release to the ground at this facility.
Value of SEP: \$40,000
Statute: Comprehensive Environmental Response, Compensation, and Liability Act
Type of Order: Administrative Penalty Order
Date of Order: 11/14/2001
Original/Final Penalty: \$20,626/\$3,351
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

Ameren Corporation, Venice, IL
701 Main St.
Venice, IL

Enforcement Action Identifier: 05-2001-1700
Attorney/Program Contacts: James Cha/James Entzminger
Type of SEP: Emergency Planning and Preparedness
SEP Description: Ameren Corporation has committed to purchase one decon shelter with accessories and a propane heater, six superpro cooling vests, and one-hundred gallons of alcohol resistant (3%-6%) aqueous film forming foam, and donate this equipment to the Madison County Local Emergency Planning Committee.
Value of SEP: \$15,050
Statute: Comprehensive Environmental Response, Compensation, and Liability Act
Type of Order: Administrative Penalty Order
Date of Order: 01/10/2002
Original/Final Penalty: \$35,065/\$14,825
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

Swagelok Company
8400 E. Pleasant Valley Rd.
Independence, OH

Enforcement Action Identifier: 05-2002-1060
Attorney/Program Contacts: Jeff Cahn/James Entzminger
Type of SEP: Pollution Reduction
SEP Description: Swagelok will purchase and install 15 oil mist collectors.
Value of SEP: \$13,622
Statute: Emergency Planning and Community Right-To-Know Act
Type of Order: Administrative Penalty Order
Date of Order: 09/23/2002
Original/Final Penalty: \$5,823/\$5,823
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

John Morrell & Co
801 E. Kemper Rd.
Springdale, OH

Enforcement Action Identifier: 05-2001-0460
Attorney/Program Contacts: Robert Guenther/James Entzminger
Type of SEP: Pollution Prevention/Equipment-Technology Modification
SEP Description: John Morrell & Company will replace seven smoke generators with seven super-heated smoke generators and they will install scrubbers on the smoke generators.
Value of SEP: \$253,411
Statute: Emergency Planning and Community Right-To-Know Act
Type of Order: Administrative Penalty Order
Date of Order: 01/16/2002
Original/Final Penalty: \$1,555,830/\$208,111
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):4 tons of particulate matter; 33 tons of volatile organic compounds (VOCs); hydrocarbons; particulate matter.

John Morrell & Co.
801 E. Kemper Rd.
Springdale, OH

Enforcement Action Identifier: 05-2001-3637
Attorney/Program Contacts: Robert Guenther/James Entzminger

Type of SEP: Pollution Prevention/Equipment-Technology Modification
SEP Description: John Morrell & Co. will replace 7 smoke generators with 7 super-heated smoke generators and 7 water scrubbers. This SEP is designed to remove 91% of volatile organic compounds (VOCs) and 87% of formaldehyde from their current emissions.
Value of SEP: \$401,000
Statute: Comprehensive Environmental Response, Compensation, and Liability Act
Type of Order: Administrative Penalty Order With or Without Injunctive Relief
Date of Order: 0/16/2002
Original/Final Penalty: \$155,830/\$1,041
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):6,600 lbs. of VOCs per year.

Joyner's Die Casting & Plating Company
7801 Xylon Avenue North
Brooklyn Park, MN

Enforcement Action Identifier: 05-2001-0434
Attorney/Program Contacts: James Cha/Howard Caine
Type of SEP: Pollution Prevention/In-Process Recycling
SEP Description: Joyner's has committed to install and operate a system that will remove metals and cyanide from the wastewater currently discharged to the Brooklyn Park, Minnesota, POTW. The system will involve no additional discharges to the POTW, and will eliminate 230 lbs. of copper, zinc, chrome and cyanide from the wastewater currently sent to the local sewerage system and treatment plant.
Value of SEP: \$80,313
Statute: Resource Conservation and Recovery Act
Type of Order: Administrative Penalty Order
Date of Order: 07/22/2002
Original/Final Penalty: \$124,157/\$20,000
Cost of Injunctive Relief: \$1,000
Quantitative Reductions (estimated amount):Estimated 230 lbs. of chromic acid per year; zinc; copper.

Keil Chemical, a division of Ferro Corporation
3000 Sheffield Ave.
Hammond, IN

Enforcement Action Identifier: 05-1999-0627
Attorney/Program Contact: Susan Tennenbaum
Type of SEP: Environmental Restoration and Protection

SEP Description: Keil agreed to pay \$844,000 to a Hammond City fund that will be used to restore a brownfield site located in an environmental justice area. The money will be used to clean up and redevelop the site.

Value of SEP: \$514,150
Statute: Clean Air Act
Type of Order: Consent Decree
Date of Order: 05/28/2002
Original/Final Penalty: \$5,000,000/\$3,000,000
Cost of Injunctive Relief: \$3,000,000
Quantitative Reductions (estimated amount): 30 acres of volatile organic compounds (VOCs).

Knauf Fiber Glass, GmbH
240 Elizabeth St.
Shelbyville, IN

Enforcement Action Identifier: 05-1998-0609
Attorney/Program Contacts: Padmavita Bending/Howard Pham
Type of SEP: Pollution Prevention/Energy Efficiency-Conservation
SEP Description: This SEP involves the installation of a baghouse on the furnace stack in order to convert the furnace stack to a natural gas/oxygen fuel system that will decrease pollutants.

Value of SEP: \$117,561
Statute: Clean Air Act
Type of Order: Consent Decree
Date of Order: 04/11/2002
Original/Final Penalty: Not Reported/\$70,000
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount): 86,000 lbs. of particulate matter per year; carbon monoxide (CO); nitrogen oxides (NOx).

Laminated Products, Inc.
5718 52nd St.
Kenosha, WI

Enforcement Action Identifier: 05-2001-0453
Attorney/Program Contacts: Jeffrey Trevino/Farro Assadi
Type of SEP: Pollution Prevention/Raw Materials Substitution
SEP Description: Laminated Products, Inc. will substitute water based adhesives for solvent based adhesives used in the post-forming process.

Value of SEP: \$298,000
Statute: Clean Air Act
Type of Order: Administrative Penalty Order
Date of Order: 11/19/2001

Original/Final Penalty: \$38,500/\$9,625
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount): 35,000 lbs. volatile organic compounds (VOCs) per year.

Mayville Limestone, Inc.
W. 2848 State Road 33
Mayville, WI

Enforcement Action Identifier: 05-2002-0102
Attorney/Program Contacts: Cynthia King/ Manojkumar Patel
Type of SEP: Pollution Prevention/Equipment-Technology Modification; Public Health
SEP Description: **SEP No. 1** - Installation and operation of spray bars on crushing operations: This SEP involves installation of a Dustpro Model 104 spray system consisting 10 gallons per minute (gpm), 200 psi pump module with four output spray lines. Line 1 would be installed at the feed hopper to suppress dust when truck dumps limestone. Lines 2 and 3 would be installed at the primary and secondary crushers. Spray treatment will control fugitive particles that are generated from the crushers and add some moisture to help control dust from the downstream screening and conveying operations. Line 4 can be brought into service in the event visible dust persists at screen discharges or stacking conveyors. This project will reduce fugitive particulate emissions by an estimated 80%.
SEP No. 2 - Installation and operation of spray bars and rail-car and truck loadouts: This SEP involves installation of a Dustpro Model 102 spray system to control dust from rail car and truck loadout operations. The spray system consists of a 10-gpm pump module equipped with two output spray lines. Line 1 would be used to control fugitive particulate emissions at the railcar loadout. Line 1 contains two sets of spray nozzles. The first set is located at the discharge of the screw conveyor. The second set is located about the perimeter of the discharge chute and is designed to suppress any fugitive particulate that escapes from under the chute. Line 2 would be used at the truck loadout. Nozzles installed about the perimeter of the slide gate are used to suppress fugitive particulate that occurs when the product falls into trucks. This project will reduce fugitive particulate emissions by an estimated 80%.
SEP No. 3 - Water truck with amended water spraying: Mayville agreed to purchase and then

operate a water truck equipped with an amended water spraying system to control fugitive emissions at the limestone quarry. The amended water spraying system will consist of chemical suppressants which will add a layer of moisture for a longer duration to help control dust. Mayville will use the amended water spraying system regularly when plant operations including trucks are being moved in the plant property. This project will reduce fugitive emissions.

Value of SEP: \$123,124
Statute: Clean Air Act
Type of Order: Administrative Penalty Order
Date of Order: 10/18/2001
Original/Final Penalty: \$193,122/\$36,686
Cost of Injunctive Relief: \$114,548
Quantitative Reductions (estimated amount): An estimated 48,000 lbs. of particulate matter will be reduced by implementing the above described SEPs.

Murphy Oil USA, Inc.
2400 Stinson Ave.
Superior, WI

Enforcement Action Identifier: 05-1998-0719
Attorney/Program Contacts: Jose Deleon/Spiros Bourgikos
Type of SEP: Pollution Prevention/Process-Procedure Modification;
Pollution Prevention/Raw Materials Substitution;
Pollution Reduction

SEP Description: This SEP involves the reduction of sulfur dioxide emissions from the fluidized catalytic cracker unit (FCCU) and the reduced burning of fuel oil from process heaters and boilers.

Value of SEP: \$7,500,000
Statute: Clean Air Act
Type of Order: Consent Decree
Date of Order: 03/19/2002
Original/Final Penalty: \$9,500,000/\$5,500,000
Cost of Injunctive Relief: \$4,500,000
Quantitative Reductions (estimated amount): 1,200,000 lbs. of sulfur dioxide (SO₂) per year

Ohio Screw Products, Inc.
818 Lowell
St. Elyria, OH

Enforcement Action Identifier: 05-2001-0492
Attorney/Program Contacts: David Mucha/ Julie Monahan
Type of SEP: Environmental Restoration and Protection; Pollution Prevention/Equipment-Technology Modification

SEP Description: Ohio screw products agreed to remove its batch vapor degreaser, and install an aqueous degreaser or another environmentally improved cleaning system that achieves at least a 50% reduction of the potential to emit of the current degreaser.

Value of SEP: \$80,000

Statute: Clean Air Act

Type of Order: Administrative Penalty Order

Date of Order: 05/20/2002

Original/Final Penalty: \$81,912/\$20,000

Cost of Injunctive Relief: \$0

Quantitative Reductions (estimated amount): 17.5 tons/year of trichlorethylene emissions

PETCO PETROLEUM CORPORATION
Section 9 Township 1 South/Range 2 E
Dix, IL

Enforcement Action Identifier: 05-2001-0646

Attorney/Program Contacts: Randa Bishlawi/Karen Vendl

Type of SEP: Other Program Specific SEP

SEP Description: PETCO Petroleum Corp. has committed to: 1) design and install an automatic, high level oil field shut-down system at its Dix Injection Facility; 2) relocate tanks and install new tanks; 3) install new gravity line piping associated with the high level oil field shut-downs system; and 4) provide a backup secondary containment at the Dix Injection Facility to prevent oil from reaching a nearby tributary should the field shut-down system fail and the lined pit overflow. The secondary backup containment has an additional purpose—if the gravity line piping from the field to the injection wells leak at the Dix Injection Facility, the secondary backup containment will prevent oil from reaching the tributary.

Value of SEP: \$72,500

Statute: Clean Water Act

Type of Order: Administrative Penalty Order

Date of Order: 04/18/2002

Original/Final Penalty: \$136,912/\$15,000

Cost of Injunctive Relief: \$0

Quantitative Reductions (estimated amount): N/A

**Pole Zero Corporation
5530 Union Centre Dr.
West Chester, OH**

Enforcement Action Identifier: 05-2001-0227
Attorney/Program Contacts: Robert Guenther/Julie Monahan
Type of SEP: Pollution Prevention/Equipment-Technology
Modification
SEP Description: Pole Zero will remove the batch vapor degreaser and
install an aqueous or other environmentally improved
cleaning system that is at least as environmentally
beneficial as an aqueous system.
Value of SEP: \$75,000
Statute: Clean Air Act
Type of Order: Administrative Penalty Order
Date of Order: 03/14/2002
Original/Final Penalty: \$159,043/ \$17,500
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount): Information currently not available

**R&F Metals Company, Inc.
9101 West Fort Street
Detroit, MI**

Enforcement Action Identifier: 05-2001-0457
Attorney/Program Contact: Richard Clarizio
Type of SEP: Environmental Compliance Promotion; Pollution
Reduction; Public Health
SEP Description: R & F Metals Company agreed to three SEPs
addressing track-out reduction, storm water collection
and treatment, chlorofluorocarbons (CFCs)
assessment and a recovery program.
Value of SEP: \$129,000
Statute: Clean Air Act
Type of Order: Administrative Penalty Order
Date of Order: 01/23/2002
Original/Final Penalty: \$319,000/\$250,000
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount): N/A

**Rogers Group, Inc.
350 S. Adams St.
Bloomington, IN**

Enforcement Action Identifier: 05-2001-0300
Attorney/Program Contacts: Joanna Glowacki/Sara Dauk
Type of SEP: Pollution Prevention/Process-Procedure Modification

SEP Description: Rogers agreed to replace the ductwork connecting the dryer to the baghouse with a new design that will reduce the number of bends the dust has to travel through. This will decrease the amount of fugitive emissions that escape from the duct work.

Value of SEP: \$17,116
Statute: Clean Air Act
Type of Order: Administrative Penalty Order
Date of Order: 12/11/2001
Original/Final Penalty: \$19,250/\$4,813
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

SPX Service Solutions
655 Eisenhower Dr.
Owatonna, MN

Enforcement Action Identifier: 05-2002-0068
Attorney/Program Contacts: Thomas Kenney/Ruth McNamara
Type of SEP: Emergency Planning and Preparedness
SEP Description: SPX service solutions will purchase and donate hazardous materials equipment to the Owatonna Fire Department, Owatonna, Minnesota.

Value of SEP: \$7,000
Statute: Emergency Planning & Community Right-To-Know Act
Type of Order: Administrative Penalty Order
Date of Order: 05/24/2002
Original/Final Penalty: \$13,752/\$3,339
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

Swagelok Company
358 Bishop Rd.
Highland Heights, OH

Enforcement Action Identifier: 05-2002-1061
Attorney/Program Contacts: Jeff Cahn/James Entzminger
Type of SEP: Pollution Reduction
SEP Description: The facility will purchase and install 15 oil mist collectors.

Value of SEP: \$13,622
Statute: Emergency Planning & Community Right-To-Know Act
Type of Order: Administrative Penalty Order
Date of Order: 09/23/2002
Original/Final Penalty: \$3,873/\$3,873

Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

Technisand, Inc.
3840 Livingston Rd.
Bridgman, MI

Enforcement Action Identifier: 05-2000-0058
Attorney/Program Contacts: John Steketee/Farro Assadi
Type of SEP: Pollution Reduction
SEP Description: Technisand agreed to install a baghouse for process emission points currently not required to be controlled. They also agreed to pave unpaved roads and parking areas to reduce fugitive dust from vehicle traffic.
Value of SEP: \$109,444
Statute: Clean Air Act
Type of Order: Administrative Penalty Order
Date of Order: 01/25/2002
Original/Final Penalty: \$214,003/\$28,192
Cost of Injunctive Relief: \$320,000
Quantitative Reductions (estimated amount):136,000 lbs. of particulate matter per year.

Union Electric Company a/k/a Amerenu
701 South Main St.
Chatham, IL

Enforcement Action Identifier: 05-2001-0508
Attorney/Program Contacts: James Cha/James Entzminger
Type of SEP: Emergency Planning and Preparedness, Public Health
SEP Description: Union Electric Company (a/k/a Amnerenu) will purchase hazardous materials equipment and donate them to the Madison County local emergency planning committee. The equipment includes one Zumro Decon shelter with accessories and a propane heater, six super pro cooling vests, and one-hundred gallons of alcohol resistant (3%-6%) aqueous film forming foam. This SEP has been initiated and requested by the local community.
Value of SEP: \$14,987
Statute: Comprehensive Environmental Response, Compensation, and Liability Act
Type of Order: Administrative Penalty Order
Date of Order: 01/10/2002
Original/Final Penalty: \$35,065/\$14,824
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount):N/A

VTC, INC.
2800 E. Old Shakopee Rd.
Bloomington, MN

Enforcement Action Identifier: 05-2001-0086
Attorney/Program Contacts: Deborah Carlson /Ruth McNamara
Type of SEP: Pollution Prevention/Energy Efficiency-Conservation
SEP Description: **1)** VTC will Install 2 degassifier membrane contacts in the reverse osmosis system used to deionize water in their semiconductor manufacturing facility. These membranes will replace the need for 15.5 tons of sodium hydroxide and will provide a significant reduction in chemical discharged to the storm sewer. **2)** VTC will substitute trans-LC for 111-trichloroethane as a cleaning agent for their high pressure oxidation tool in the dvd/diffusion area of their water fabrication process. **3)** VTC agreed to reduce isopropyl alcohol replenish times from 15 seconds resulting in a 30% reduction of isopropyl alcohol. **4)** VTC agreed to reduce the use of sulfuric acid at their 8" manufacturing line. **5)** VTC agreed to install a scrubber that substituted reverse osmosis reject water for the semiconductor line reducing the use of city water by over one million gallons each year. **6)** VTC agreed to add two additional inlets to an existing scrubber that would allow for the capture and scrubbing of hydrogen chloride, hydrogen fluoride and perfluorocarbon by-products from their water fabrication process.

Value of SEP: \$71,666
Statute: Emergency Planning and Community Right-To-Know Act
Type of Order: Administrative Penalty Order
Date of Order: 11/6/2001
Original/Final Penalty: \$240,750/\$36,800
Cost of Injunctive Relief: \$0
Quantitative Reductions (estimated amount): 15 tons of sodium hydroxide; hydrogen chloride; hydrogen fluoride; isopropyl alcohol.