



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 29 2019

REPLY TO THE ATTENTION OF

VIA E-MAIL

Patricia Bradley
Ingredion Incorporated
6400 South Archer Avenue
Bedford Park, Illinois 60501
Email: patricia.bradley@ingredion.com

Dear Ms. Bradley:

Enclosed is a file-stamped Consent Agreement and Final Order (CAFO) which resolves Ingredion Incorporated, docket no. CAA-05-2019-0013. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on

March 29, 2019

Pursuant to paragraph 47 of the CAFO, Ingredion Incorporated must pay the civil penalty within 30 days of the filing date. Your electronic funds transfer must display the case name and case docket number.

Please direct any questions regarding this case to Cathy Martwick, Associate Regional Counsel, (312) 886-7166.

Sincerely,

A handwritten signature in cursive script, reading "Brian Dickens", is written above the typed name.

Brian Dickens, Chief
Air Enforcement and Compliance Assurance Section (MN/OH)

Enclosure

cc: Ann Coyle, Regional Judicial Officer/C-14J
Regional Hearing Clerk/E-19J
Cathy Martwick/C-14J
Julie Armitage/Julie.Armitage@Illinois.gov

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:

**Ingredion Incorporated,
Bedford Park, Illinois,**

Respondent.



Docket No. CAA-05-2019-0013

**Proceeding to Assess a Civil Penalty
Under Section 113(d) of the Clean Air Act,
42 U.S.C. § 7413(d)**

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 Ingredion Incorporated (Ingredion), a corporation doing business in Illinois.
4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).
5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.
6. Respondent consents to the assessment of the civil penalty specified in this CAFO and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

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

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO and its right to appeal this CAFO.

Statutory and Regulatory Background

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

10. On February 21, 1980, EPA approved Illinois Pollution Control Board (IPCB) Rule 203(d)(9)¹ as part of the federally enforceable Illinois State Implementation Plan (SIP). 45 *Fed. Reg.* 11472.

11. IPCB Rule 203(d)(9) addresses the visible emissions and particulate matter (PM) emissions from agricultural facilities, primarily from grain handling and grain drying operations. Specifically, IPCB Rule 203(d)(9)(A)(i) requires that all grain-handling and grain-drying operations implement and use certain housekeeping practices, including that air pollution control devices shall be checked daily and cleaned as necessary to insure proper operation.

12. On March 11, 1998, EPA approved IPCB Rule 212.324 as part of the federally enforceable Illinois SIP. 63 *Fed. Reg.* 11842.

13. IPCB Rule 212.324(f), provides that “[f]or any process emission unit subject to subsection (a), of this Section, the owner or operator shall maintain and repair air pollution control equipment in a manner that assures that applicable emission limits and standards shall be met at all

¹ The State recodified this regulation as Rule 212.461, however, EPA has not approved the recodification.

times. This Section shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements: (1) Visual inspection of air pollution control equipment; (2) Maintenance of an adequate inventory of spare parts; and (3) Expedient repairs, unless the emission unit is shutdown."

14. Title V of the CAA, 42 U.S.C. §§ 7661a-7661f, establishes an operating permit program for certain sources, including "major sources."

15. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), states that "[a]fter the effective date of any permit program approved or promulgated under this subchapter, it shall be unlawful for any person to violate any requirement of a permit issued under this subchapter, or to operate...a major source...except in compliance with a permit issued by a permitting authority under this subchapter."

16. Pursuant to Section 502(b) of the CAA, 42 U.S.C. § 7661a(b), on July 21, 1992, EPA promulgated regulations establishing the minimum elements of a permit program to be administered by any air pollution control agency (57 *Fed. Reg.* 32295). These regulations are codified at 40 C.F.R. Part 70.

17. 40 C.F.R. § 70.2 defines "major source," in part, as any stationary source belonging to a single major industrial grouping and that directly emits or has the potential to emit 100 tons per year (tpy) of any air pollutant, as defined under Section 302 of the Act, 42 U.S.C. § 7602.

18. 40 C.F.R. § 70.7(b) states that, with minor exceptions inapplicable to the violations alleged herein, "[n]o part 70 source may operate after the time that it is required to submit a timely and complete application under an approved permit program, except in compliance with a permit issued under a part 70 program."

19. EPA gave final interim approval to the Illinois Title V Permit program, effective March 7, 1995. (60 *Fed. Reg.* 12478 (March 7, 1995)). EPA fully approved the Illinois Title V Permit program, effective November 30, 2001. (66 *Fed. Reg.* 62946 (December 4, 2001)). Illinois' Title V Permit program requirements are codified in the Illinois Administrative Code (IAC) at Title 35, Part 270.

20. On December 21, 1994, IEPA issued Construction Permit 93010072 (1994 Construction Permit) to Ingredion, formerly known as CPC International Inc. Corn Products – Argo Plant. The 1994 Construction Permit established emission limits for the Gluten Rotary Filters, the Main Exhaust Lines 1 and 2 from the Germ, Gluten, and Feed Drying Operations. On March 21, 1997, IEPA issued Revised Construction Permit 93010072 (1997 Revised Construction Permit) to Ingredion, formerly known as CPC International Inc. Corn Products – Argo Plant.

21. Condition 8a of Construction Permit 93010072 requires Ingredion to operate, maintain and repair all air pollution equipment in a manner that assures that the emission limits set forth in Table 1 are met at all times.

22. Table 1 of Construction Permit 93010072 limits PM emissions from each of seven Gluten Rotary Filters to 0.1 pounds per hour (lb/hr) and 0.43 tons per year (tpy).

23. Table 1 of Construction Permit 93010072 limits the combined PM emissions of Main Exhaust Lines 1 and 2 from the Germ, Gluten, and Feed Drying Operations to 17.62 lb/hr.

24. On June 2, 2000, the IEPA issued Title V Permit Number 96010009 (Title V Permit) to Ingredion. Ingredion submitted a timely renewal application and continues to operate under this Title V Permit.

25. Table 1A of the Title V Permit incorporates the PM emissions limits for each of the seven Gluten Rotary Filters and Main Exhaust Lines 1 and 2 from the Germ, Gluten, and Feed Drying Operations, as established in Construction Permit 93010072.

26. Condition 5.4 of the Title V Permit provides that “[f]or any process emission unit described in Condition 5.2.2(c), the owner or operator shall maintain and repair air pollution control equipment in a manner that assures that applicable emission limits and standards shall be met at all times. Proper maintenance shall include the following minimum requirements: (a) Visual inspection of air pollution control equipment; (b) Maintenance of an adequate inventory of spare parts; and (c) Expeditious repairs, unless the emission unit is shutdown.” *See also* 35 IAC 212.324(f).

27. Condition 5.2.2(c) of the Title V Permit describes the process emission units which are covered by Condition 5.4.

28. On June 3, 2004, IEPA issued Construction Permit number 03090020, allowing for the construction of a new coal-fired boiler, Boiler #10, and associated equipment at the Bedford Park facility (the 2004 Construction Permit).

29. Condition 1.1.6(b) of the 2004 Construction Permit limits emissions of sulfur dioxide (SO₂) from Boiler #10 to 0.30 pounds per million British thermal units (lb/mmBtu), on a 30-day rolling average basis.

30. 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.

31. 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

32. Ingredion owns and operates a corn wet milling facility (the facility) at 6400 South Archer Avenue, Bedford Park, Cook County, Illinois.

33. Ingredion is a corporation authorized to do business in Illinois.

34. Ingredion is a "person" as that term is defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

35. The facility emits or has the potential to emit 100 tpy of a criteria air pollutant.

36. The facility includes grain handling equipment subject to IPCB Rule 203(d)(9) of the Illinois SIP.

37. The facility includes process emission units subject to IPCB Rule 212.324(f) of the Illinois SIP.

38. Ingredion owns or operates an "emission source" within the meaning of Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). Therefore, Ingredion is subject to the requirements of Section 114(a)(1).

39. On March 10, 2015, EPA issued to Ingredion a Notice of Violation alleging that it violated Condition 1.1.6(b) of the 2004 Construction Permit by exceeding the 30-day rolling average emissions limits for SO₂ at Boiler #10.

40. On June 1, 2015, representatives of Ingredion and EPA discussed the March 10, 2015 Notice of Violation.

41. On June 30, 2016, EPA issued to Ingredion a Notice and Finding of Violation alleging that it violated:

- a. Construction Permit 93010072 and its Title V Permit by exceeding emission rate limits and annual emission limits for PM on the Gluten Rotary Filters # 1, 2, 3, 4, 5, 6, and 7;
- b. Construction Permit 93010072 and Title V Permit by exceeding emission rate limits for PM from the East and West Gluten Dryers;
- c. IPCB Rule 212.324(f) of the Illinois SIP and Condition 5.4 of the Title V Permit by failing to maintain its baghouses and conduct expeditious repairs;
- d. IPCB Rule 203(d)(9) of the Illinois SIP by failing to perform daily baghouse checks; and
- e. Certain other requirements which EPA is no longer pursuing.

42. On August 11, 2016, Ingredion submitted an application to IEPA to amend the PM emission limits for Gluten Rotary Filters 1 – 7 in Construction Permit 93010072 such that the limits were not lower than the actual PM emissions from the Gluten Rotary Filters as demonstrated during the 2015 performance testing.

43. On August 11, 2016, Ingredion submitted an application to IEPA to amend the volatile organic compound (VOC) emission limits for Gluten Rotary Filters 1 – 7, the Secondary Exhaust Line for the Feed, Germ and Gluten Drying/Cooling, the Wet Mill Tanks Vent Fan, and the Wet Feed Mixing Conveyors in Construction Permit 93010072 such that the limits were not lower than the actual VOC emissions from these units as demonstrated during the 2008 – 2010 testing program. The amended application also requested that other VOC limits at other units at the facility be adjusted, such that the VOC emissions in the final amended permit will not be greater

than the total VOC emissions for the applicable emission units in Clean Air Act Permit Program (CAAPP) permit number 9601009 issued June 2, 2000.

44. On September 30, 2016, representatives of Ingredion and EPA discussed the June 30, 2016 Notice and Finding of Violation.

45. Ingredion violated:

- a. Condition 1.1.6(b) of the 2004 Construction Permit, as described in Paragraph 39 above;
- b. Construction Permit 93010072 and its Title V Permit, as described in Paragraph 41.a and 41.b, above;
- c. IPCB Rule 212.324(f) of the Illinois SIP and Condition 5.4 of the Title V Permit; and,
- d. IPCB Rule 203(d)(9) of the Illinois SIP.

Civil Penalty

46. 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, Ingredion's cooperation, and its agreement to perform a supplemental environmental project, Complainant has determined that an appropriate civil penalty to settle this action is \$99,000.

47. Within 30 days after the effective date of this CAFO, Respondent must pay a \$99,000 civil penalty by either:

- (1) electronic funds transfer, payable to "Treasurer, United States of America," and sent to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, New York 10045

Field Tag 4200 of the Fedwire message should
read: "D68010727 Environmental Protection Agency"

And in the comment or description field of the electronic funds transfer, state Respondent's
name and the docket number of this CAFO;

or (2) 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

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

48. 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-18J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Cathleen Martwick (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

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

50. If Respondent does not pay timely the civil penalty or any stipulated penalties due under paragraph 61, 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.

51. 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

52. Respondent must complete a supplemental environmental project (SEP) designed to protect public health by abating lead-based paint hazards in a number of child-occupied facilities as defined at 40 C.F.R. § 745.83 or residential properties in or about the Bedford Park, Illinois area, as further described below.

53. Respondent must complete the SEP as follows:

- a. 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, the replacement of lead-based painted surfaces or fixtures, and other activities that must be included as part of the lead abatement work in order for it to be

successful, such as lead hazard evaluation, planning, cleaning, clearance, and waste disposal.

- b. To be eligible for lead-based paint abatement under this SEP, structures must be located within Cook County.
- c. The focus of the SEP will be lead abatement at owner-occupied, low-income residences or child-occupied facilities where children age six and under or pregnant women reside or regularly visit, and whose occupants are unable to afford the costs of such work. Respondent shall consult with the Illinois Department of Public Health (IDPH) and local public health agencies to identify structures for lead-based paint abatement work under this SEP. Prioritization shall be given, in this order, to: (1) structures identified by IDPH and local public health agencies; (2) structures located in census tracts that show a higher rate of elevated blood lead levels in children under age 6 than the statewide average, with tracts showing the highest levels given priority; (3) structures where pregnant women or children under age 6 reside or “visit regularly” (within the meaning set forth in the first sentence of the definition, above, of “child-occupied facility”).
- d. Respondent may use nonprofit organizations, contractors, and/or consultants in planning and implementing this SEP; however, Respondent is responsible for the satisfactory completion of this SEP in accordance with this CAFO. In implementing the Lead Abatement SEP, Respondent must ensure that the individuals or entities performing the work are certified, knowledgeable, and experienced in conducting lead-based paint abatement work.

- e. Respondent will conduct the SEP according to all applicable federal and state work practice and notification requirements including, but not limited to, the rules promulgated by IDPH for lead poisoning prevention (including licensing) and the United States Department of Housing and Urban Development's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing.
 - f. Respondent must fully fund an escrow account to pay for the lead abatement SEP not later than 30 days after the effective date of this CAFO. Respondent must spend at least \$220,000 for the lead abatement SEP. Respondent shall complete the SEP by September 30, 2020, provided that this date may be extended by mutual agreement of the Respondent and EPA in writing.
54. Respondent certifies as follows:
- a. It is not a party to any open federal financial assistance transaction that is funding or could fund the same activity as the SEP described in Paragraphs 52-53;
 - b. It has inquired of the SEP implementer whether it is a party to an open federal financial assistance transaction that is funding or could fund the same activity as the SEP and has been informed by the recipient that it is not a party to such a transaction;
 - c. That all cost information to be provided to the EPA in connection with the EPA's approval of each SEP will be complete and accurate and that Defendant in good faith estimates that the cost to implement the SEP is \$220,000;
 - d. That, as of the date of executing this CAFO, Respondent is not required to perform or develop the SEP by any federal, state, or local law or regulation and is not required to perform or develop the SEP by agreement, grant, or as injunctive relief awarded in any other action in any forum;
 - e. That the SEP is not a project that Respondent was planning or intending to construct, perform, or implement other than in settlement of the claims resolved in this CAFO;
 - f. That Respondent has not received and will not receive credit for the SEP in

any other enforcement action; and

- g. That Respondent will not receive reimbursement for any portion of the SEP from another person or entity.

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

56. Respondent must submit a SEP completion report to EPA within 60 days of completion of the SEP. This report must contain the following information:

- a. Detailed description of the SEP as completed;
- b. Description of any operating problems 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).

57. Respondent must submit all notices and reports required by this CAFO by first-class mail to the Compliance Tracker of the Air Enforcement and Compliance Assurance Branch at the address provided in paragraph 48, above.

58. In each report that Respondent submits as provided by this CAFO, it must certify that the report is true and complete by including the following statement signed by one of its officers:

I certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, it is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

59. Following receipt of the SEP completion report described in paragraph 56, 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 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 61.

60. 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 61, below.

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

- a. If Respondent fails to implement the SEP, or halts or abandons work on the SEP, Respondent shall pay a stipulated penalty to EPA equal to \$25,000 plus the difference between \$220,000 and the amount expended in satisfactory performance of the SEP as demonstrated in certified cost reports. The penalty under this subparagraph shall apply as of the date specified for completing the SEP or the date performance ceases, whichever is earlier.
- b. If Respondent did not submit timely the SEP completion report, Respondent must pay penalties in the following amounts for each day after the report was due until it submits the report:

<u>Penalty per violation per day</u>	<u>Period of violation</u>
\$250	1 st through 14 th day
\$500	15 th through 30 th day
\$1,000	31 st day and beyond

62. 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.

63. 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 47, above, and will pay interest and nonpayment penalties on any overdue amounts.

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

65. 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

66. The parties consent to service of this CAFO by e-mail at the following e-mail addresses: Martwick.cathleen@epa.gov (for Complainant), and patricia.bradley@ingredion.com (for Respondent). The parties waive their right to service by the methods specified in 40 C.F.R. § 22.6.

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

68. 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.

69. 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 67, above, compliance with this CAFO will not be a defense to any actions subsequently commenced pursuant to federal laws administered by EPA.

70. Respondent certifies that it is complying fully with Condition 1.1.6(b) of the 2004 Construction Permit, Condition 5.4 of the Facility's Title V Permit, IPCB Rule 212.324(f) of the Illinois SIP and IPCB Rule 203(d)(9) of the Illinois SIP. Upon issuance of the revised Construction Permit 93010072, Respondent shall comply with the terms of the revised permit unless Respondent appeals the revised Construction Permit 93010072. In that instance, Respondent shall comply with the terms of the revised Construction Permit 93010072 after appeals of the revised Construction Permit 93010072 are resolved. Within 90 days after Illinois EPA issues revisions to Construction Permit 93010072, and any appeals of that revised permit are resolved, Ingredion will submit an application to Illinois EPA to incorporate the revised emission limits into its Title V permit.

71. 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).

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

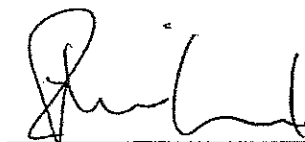
73. Each person signing this consent agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

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

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

Ingredion Incorporated, Respondent

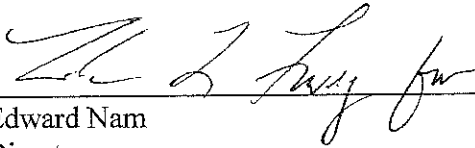
27TH MARCH, 2019
Date



Ron McCrimmond
Vice President, EHSS, Corporate and North America
Ingredion Incorporated

United States Environmental Protection Agency, Complainant

3/27/19
Date

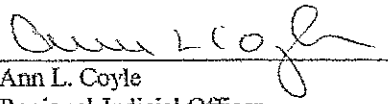

Edward Nam
Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

Consent Agreement and Final Order
In the Matter of: Ingrezion Incorporated
Docket No. CAA-05-2019-0013

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.

March 28, 2019
Date


Ann L. Coyle
Regional Judicial Officer
U.S. Environmental Protection Agency
Region 5

Consent Agreement and Final Order
In the matter of: Ingreption Incorporated
Docket Number: CAA-05-2019-0013

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, docket number CAA 05 2019 0013, which was filed on March 29, 2019, in the following manner to the following addressees:

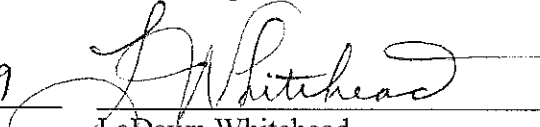
Copy by E-mail to Respondent: Patricia Bradley
patricia.bradley@ingredion.com

Copy by E-mail to Attorney for Complainant: Cathy Martwick
Martwick.cathleen@epa.gov

Copy by E-mail to Attorney for Respondent: LaDonna Driver
LaDonna.Driver@heplerbroom.com

Copy by E-mail to Regional Judicial Officer: Ann Coyle
coyle.ann@epa.gov

Dated: March 29, 2019



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