

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

FILED

Jun 09, 2025

2:51 pm

**U.S. EPA REGION 5
HEARING CLERK**

In the Matter of:	)	Docket No. CAA-05-2025-0013
	)	
Wieland Rolled Products	)	Proceeding to Assess a Civil Penalty
North America, LLC	)	Under Section 113(d) of the Clean Air Act,
East Alton, Illinois	)	42 U.S.C. § 7413(d)
	)	
Respondent.	)	
_____	)	

Consent Agreement and Final Order

A. Preliminary Statement

1. This is an administrative penalty assessment proceeding 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. §§ 22.1(a)(2), 22.13(b) and 22.18(b)(2) and (3).

2. Complainant is the U.S. Environmental Protection Agency (EPA). The EPA Administrator has delegated the authority to settle civil administrative penalty proceedings under Section 113(d) of the CAA to the Division Director of the Region 5 Enforcement and Compliance Assurance Division.

3. Respondent is Wieland Rolled Products North America, LLC, a corporation doing business in Illinois. Respondent is a "person," as defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

4. The EPA and Respondent agree that settling this action is in the public interest and consent to the entry of this Consent Agreement and Final Order (CAFO) without the adjudication of any issues of law or fact.

5. Respondent agrees to comply with the terms of this CAFO.

B. Jurisdiction

6. The alleged violations in this CAFO are pursuant to Section 113(a)(3)(A) of the CAA.

7. The EPA and the United States Department of Justice have jointly determined that this matter, although it involves a penalty assessment above \$472,901 and alleged violations that occurred more than one year before the initiation of this proceeding, is appropriate for an administrative penalty assessment. 42 U.S.C. § 7413(d); 40 C.F.R. § 19.4.

8. On December 20, 2019 and March 15, 2024, the EPA issued to Respondent a Notice of Violation and/or Finding of Violation (NOV/FOVs) and provided a copy of the NOV/FOVs to the Illinois Environmental Protection Agency (IEPA), providing notice to Respondent and IEPA that the EPA found Respondent committed the alleged violations described in Section E of this CAFO and providing Respondent an opportunity to confer with the EPA. On February 20, 2020 and April 29, 2024, representatives of Respondent and the EPA conferred regarding the NOV/FOVs.

9. The Regional Judicial Officer of Region 5 is authorized to ratify the consent agreement memorializing the settlement between the EPA and Respondent and to issue the attached Final Order. *See* 40 C.F.R. §§ 22.4(b) and 22.18(b).

C. Statutory and Regulatory Background

10. The CAA is designed to, among other things, protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population. *See* Section 101(b)(1) of the CAA, 40 U.S.C. § 7401(b)(1).

CAAPP Permit

11. Title V of the CAA, 42 U.S.C. §§ 7661-7661f, establishes an operating permit program for sources of air pollution.

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

13. Section 502(d) of the CAA, 42 U.S.C § 7661a(d), provides that each state must submit to EPA an operating permit program meeting the requirements of Title V.

14. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V operating permit.

15. Pursuant to 40 C.F.R. § 70.6(b)(1), all terms and conditions contained in a Title V permit are enforceable by EPA.

16. EPA fully approved the Illinois Title V program on December 4, 2001. *See* 66 Fed. Reg. 62946 (effective on November 30, 2001). 415 Illinois Compiled Statutes (ILCS) 5/39.5 contains the Illinois Clean Air Act Permit Program (CAAPP) pursuant to Title V of the CAA. The regulations governing the Illinois Title V permitting program are codified at 35 Illinois Administrative Code (IAC) 201 and are federally enforceable pursuant to CAA Section 113(a)(3).

17. 415 ILCS 5/39.5.6 of the CAAPP provides that “it shall be unlawful for any person to violate any terms or conditions of a permit issued under this Section, to operate any CAAPP source except in compliance with a permit issued by the Agency under this Section or to violate any other applicable requirements” and that “all terms and conditions of a permit issued under this section

are enforceable by USEPA and citizens under the CAA, except those, if any, that are specifically designated as not being federally enforceable in the permit pursuant to paragraph 7(m) of this Section.”

NSPS Subpart M and Opacity

18. Pursuant to Section 111 of the CAA, 42 U.S.C. § 7411, EPA promulgated the New Source Performance Standards (NSPS) General Provisions, at 40 C.F.R. Part 60, Subpart A, which contain general provisions that apply to the owner or operator of any stationary source that contains an affected facility, the construction or modification of which is commenced after the date of publication of any NSPS standard applicable to the facility. *See* 40 C.F.R. § 60.1(a).

19. Pursuant to 40 C.F.R. § 60.11(d), the NSPS general provisions require that, at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions, which is determined by information that may include monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

20. Pursuant to Section 111 of the CAA, 42 U.S.C. § 7411, on March 8, 1974, EPA promulgated the NSPS for Secondary Brass and Bronze Production Plants at 40 C.F.R. 60, Subpart M. *See* 39 Fed. Reg. 9318. The Rule was subsequently amended on October 6, 1975. *See* 40 Fed. Reg. 4659, and October 30, 1984, 49 Fed. Reg. 43618.

21. The requirements of Subpart M apply to reverberatory and electric furnaces of 1,000 kg (2,205 lbs) or greater production capacity and blast (cupola) furnaces of 250 kg/hr (550 lbs/hr) or greater production capacity in secondary brass or bronze production plants. 40 C.F.R. § 60.130(a).

22. The requirements of Subpart M apply to furnaces constructed or modified after June 11, 1973. *See* 40 C.F.R. § 60.130(b).

23. Subpart M states that no owner or operator shall discharge or cause the discharge into the atmosphere from any blast (cupola) or electric furnace any gases which exhibit 10 percent opacity or greater. *See* 40 C.F.R. § 60.132(b). Subpart M states that Method 9 and the procedures in 40 C.F.R. § 60.11 shall be used to determine opacity. *See* 40 C.F.R. § 60.133(b)(2).

D. Stipulated Facts

24. In approximately April 2019, Wieland Werke AG merged with Global Brass and Copper Holdings, Inc., which was the parent company of GBC Metals, LLC d/b/a Olin Brass now known as Wieland Rolled Products North America, LLC. Wieland owns and operates a brass and bronze production plant at 305 Lewis and Clark Boulevard, East Alton, Illinois (Facility).

25. The Facility operates the following electric furnace emission units: #1, #2, #3, #4, and #5 D.C. Casting Units and the #1 and #2 Ascast Casting Units (Casting Units). Each Casting Unit possesses a capacity greater than 2,205 pounds and were constructed or modified after June 11, 1973.

NSPS Subpart M and Opacity

26. As stated in the Facility's CAAPP Permit, the Casting Units are subject to NSPS, Subpart M.

27. Wieland 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, Wieland is subject to the requirements of Section 114(a)(1).

28. On June 27-28, 2017, EPA conducted a CAA inspection of the Facility (2017 Inspection).

29. During the 2017 Inspection, EPA observed the #4 D.C. Casting Unit and the #1 Ascast Casting Unit in operation. Both emission units emitted white smoke that vented uncaptured emissions toward an opening in the roof (Roof Vent), which is positioned immediately overhead the Casting Units.

30. During the 2017 Inspection, EPA also collected Method 9 readings of visible emissions at the Facility. Between 9:43 AM and 9:56 AM, EPA observed white emissions from the Facility Roof Vent with a maximum 6-minute average opacity of 17.7%.

31. On October 10, 2017, the Facility submitted a list of operations that occurred within the Facility on the morning of June 28, 2017. This list indicates that the #1, #2, #3, and #4 D.C. Casting Units and the #1 and #2 Ascast Casting Units were operating during EPA's Method 9 readings.

32. On April 30, 2018, EPA issued a second CAA Section 114 Information Request to the Facility that requested updated records and production information.

33. On December 20, 2019, EPA issued the Facility a Notice and Finding of Violation (NOV/FOV) alleging that it violated NSPS Subpart M, 40 C.F.R. § 60.11(d), and its CAAPP permit by failing to maintain and operate the Casting Units in a manner consistent with good air pollution control practices for minimizing emissions and exceeding the 10% opacity limit at the Casting Unit roof vent.

34. On February 20, 2020, representatives of Wieland and EPA discussed the December 20, 2019, NOV/FOV.

35. During discussions to date, Wieland explained that there have been three generations of hooding installed on the DC units since 2019. The first generation of hooding added a fume collection cowl and intake to the hooding on the side of the holding furnace that pours molten metal into the mold. A damper allowed for additional air evacuation through the new intake when

molten metal was poured out of the holding furnace and into the casting mold. The second generation added a damper position indicator and interlock system that prevent casting if the damper was not in the correct position for collecting emissions generated during casting. The third generation holding furnace hood consisted of the addition of a canopy over the molds that retracts as the furnace tilts towards the molds. This additional canopy enhanced the capture of emissions generated at the start of the casting cycle when the fume withdraw point was furthest from the molds. The third generation included an interlock system that prevents the holding furnace from tilting unless the canopy has been extended over the molds. The interlock system stays active until the holding furnace has tilted forward 25% of the full travel range.

36. As of August 26, 2022, Wieland has completed the installation of the third generation of hooding systems on all 5 DC units to reduce opacity and ensure good air pollution control practices for minimizing emissions.

CAAPP Permit and Lead Limit

37. On April 28, 2020, IEPA issued a Revised CAAPP permit to Wieland Rolled Products North America, LLC (Permit number 07110030).

38. Condition 4.1.2 (h)(i)(A) of Wieland's Revised CAAPP permit states that "pursuant to Construction Permit #03060079 lead emissions from Ascast furnaces 1, Ascast furnaces 2, and #1 through #5 DC Casting Unit shall not exceed the following limits 0.005 lbs/hour and 0.025 tons/year."

39. On September 13, 2019, Wieland conducted a stack test of the #5 DC Casting Unit controlled by No 3 Baghouse (BH-5). Wieland reported a lead emissions rate from only No 3 Baghouse of 0.00376 lbs/hour.

40. According to Wieland's response to EPA's April 30, 2018 information request, No 3 Baghouse is only one of three baghouses controlling lead emissions from Ascast furnaces 1, Ascast furnaces 2, and #1 through #5 DC Casting Units.

41. On February 14-15, 2023 and May 5-6, 2023 (BH-5), July 6-20, 2023 (BH-4), and September 12-15, 2023 (BH-1), Wieland conducted stack tests of all three baghouses (2023 Stack Tests). Wieland reported the maximum alloy specific lead emissions rates from each of these tests as: 0.00072 lbs/hour for BH-1 (using Alloy Group 3), 0.00065 lbs/hour for BH-4 (using Alloy Group 1), and 0.028 lbs/hour for BH-5 (using Alloy 110). The combined maximum lead emission rate from all three baghouses would therefore be 0.02936 lbs/hour, which exceeds the 0.005 lbs/hour CAAPP lead emissions limit.

42. During the 2023 Stack Tests, Wieland also reported maximum alloy specific annual lead emissions rates from BH-1, BH-4, and BH-5 of 0.0027, 0.0024, and 0.110 tons/year, respectively. The combined potential maximum worst case alloy specific annual lead emissions from all three baghouses would be 0.115 tons/year, which exceeds the 0.025 tons/year CAAPP lead emissions limit.

43. On March 15, 2024, EPA issued the Facility a FOV alleging that Wieland violated Condition 4.1.2 (h)(i)(A) of its CAAPP permit by exceeding its permitted lead emission limit.

44. On April 29, 2024, EPA met with Wieland to discuss the allegations during which Wieland stated that in mid-October 2023 it had replaced the Camcorp FM0103 Pleated Filter Elements in BH-5 (#3 Baghouse) with the higher efficiency Camcorp FM0203 Pleated Filter Elements to significantly reduce lead emissions from the baghouse and that on January 17-19, 2024, it had conducted a follow-up stack test on BH-5.

45. The results from the January 2024, follow-up stack test estimated that maximum lead emissions from BH-5 (#3 Baghouse) was 0.000185 lbs/hr which extrapolates to 0.000714 tons/year (assuming 7,732 operating hours and only alloy 110) after the replacement bags were installed. These results demonstrate compliance with Facility's combined lead emission limit.

E. Allegations

46. Wieland violated 40 C.F.R. § 60.11(d) by failing to maintain and operate the Casting Units in a manner consistent with good air pollution control practices for minimizing emissions, as determined by the 2017 Inspection and Method 9 opacity observations.

47. Wieland violated 40 C.F.R. § 60.132(b) of Subpart M and Section 4.1.2(a)(i) of the CAAPP permit by exceeding the 10% opacity limit for emissions from the Casting Units.

48. Wieland violated Condition 4.1.2 (h)(i)(A) of Wieland's CAAPP permit by exceeding its permitted lead emission limit.

F. Terms of Consent Agreement

49. For the purposes of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:

- a. admits to the jurisdictional allegations in this CAFO;
- b. neither admits nor denies the allegations stated in Section E of this CAFO;
- c. consents to the assessment of a civil penalty as stated below;
- d. consents to any conditions specified in this CAFO;
- e. waives any right to contest the allegations set forth in Section E of this CAFO;
and
- f. waives its right to appeal this CAFO.

50. For the purposes of this proceeding, Respondent:

- a. agrees this CAFO states a claim upon which relief may be granted against Respondent;

- b. acknowledges this proceeding constitutes an enforcement action for purposes of considering Respondent's compliance history in any subsequent enforcement actions;
- c. 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 CAFO, including any right of judicial review under Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1);
- d. waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c);
- e. 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 accompanying the consent agreement; and
- f. 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 compel compliance with the CAFO, and to seek an additional penalty for noncompliance, and agrees that federal law shall govern in any such civil action.

51. Based on analysis of the factors specified in Section 113(e) of the CAA, 42 U.S.C.

§ 7413(e), the facts of this case, and Respondent's cooperation and prompt return to compliance, the EPA has determined that an appropriate civil penalty to settle this action is \$962,985.

52. Respondent agrees to pay the civil penalty amount above (Assessed Penalty) within thirty (30) days after the date the Final Order ratifying this Agreement is filed with the Regional Hearing Clerk (Filing Date).

53. 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>.

54. When making a payment, Respondent shall:

- a. Identify every payment with Respondent's name and the docket number of this Agreement, CAA-05-2025-0013,

- b. Concurrently with any payment or within 24 hours of any payment, Respondent shall serve proof of such payment to the following person(s):

Regional Hearing Clerk (E-19J)
U.S. Environmental Protection Agency, Region 5
r5hearingclerk@epa.gov

Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
R5airenforcement@epa.gov

Cynthia King
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
king.cynthia@epa.gov

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

“Proof of payment” means, as applicable, a copy of the 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 EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent’s name.

55. Interest, Charges, and Penalties on Late Payments. Pursuant to 42 U.S.C. § 7413(d)(5), 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 entire unpaid balance of the Assessed Penalty and all accrued interest shall become immediately owing, and the EPA is authorized to recover the following amounts, in addition to the amount of the unpaid balance of the Assessed Penalty.

- 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. § 7413(d)(5), interest will be assessed pursuant to 26 U.S.C. § 6621(a)(2), that is, the IRS standard

underpayment rate, equal to the Federal short-term rate plus 3 percentage points.

- b. Handling Charges. The United States' enforcement expenses including, but not limited to, attorneys' fees and costs of handing collection.
- c. Late Payment Penalty. A ten percent (10%) quarterly non-payment penalty.

56. 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., the withholding of 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 Internal Revenue Service 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 EPA or engaging in programs 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 enforce the Final Order and recover the full remaining balance of the Assessed Penalty, in addition to interest and the amounts described above, per 42 U.S.C. § 7413(d)(5). In any such action, the validity, amount, and appropriateness of the Assessed Penalty and Final Order shall not be subject to review.

57. 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.

58. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Agreement shall not be deductible for purposes of federal taxes.

59. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, EPA is required to send to the Internal Revenue Service (IRS) annually, 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 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." 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). 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, EPA herein requires, and Respondent herein agrees, that:

- 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/irs-pdf/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 EPA's Cincinnati Finance Center at wise.milton@epa.gov, within 30 days after the Final Order ratifying this Agreement is filed, and EPA recommends encrypting IRS Form W-9 email correspondence; and
- 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 EPA's

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

60. By signing this CAFO, Respondent consents to the release of any information in this CAFO to the public and agrees this CAFO does not contain business information that is entitled to confidential treatment under 40 C.F.R. Part 2.

61. By signing this CAFO, the undersigned representative of the EPA and the undersigned representative of Respondent each certify that they are fully authorized to execute and enter into the terms and conditions of this CAFO and have the legal capacity to bind the party they represent to this CAFO.

62. By signing this CAFO, Respondent certifies the information it has supplied concerning this matter was at the time of submission true, accurate, and complete for each such submission, response, and statement. Respondent acknowledges that, under 18 U.S.C. § 1001, there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information.

63. Each party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding, except in the case of a civil action brought by the Attorney General of the United States to recover unpaid penalties as described above.

G. Effect of Consent Agreement and Attached Final Order

64. The parties consent to service of this CAFO by e-mail at the following e-mail addresses: king.cynthia@epa.gov (for the EPA), and ashley.huber@wieland.com (for Respondent).

65. In accordance with 40 C.F.R. § 22.18(c), completion of the terms of this CAFO resolves only Respondent's liability for federal civil penalties for the violations specifically alleged in this CAFO.

66. This CAFO 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 this matter with the exception of the administrative compliance order, docket number EPA-5-25-113(a)-IL-01 issued October 31, 2024.

67. The terms, conditions, and compliance requirements of this CAFO may not be modified or amended except upon the written agreement of both parties and approval of the Regional Judicial Officer.

68. The provisions of this Agreement shall apply to and be binding upon Respondent and its officers, directors, authorized representatives, successors, and assigns.

69. Any violation of this CAFO may result in a civil judicial action for an injunction or civil penalties of up to \$124,426 per day per violation, or both, as provided in Section 113(b) of the CAA, 42 U.S.C. § 7413(b), and 40 C.F.R. § 19.4, as well as criminal sanctions as provided in Section 113(c) of the CAA, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this CAFO in an administrative, civil judicial, or criminal action.

70. Nothing in this CAFO relieves Respondent of the duty to comply with all applicable provisions of the CAA and other federal, state, or local laws or statutes, nor does it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor is it a ruling on, or determination of, any issue related to any federal, state, or local permit.

71. Nothing in this CAFO limits the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.

72. The EPA reserves the right to revoke this CAFO and settlement penalty if and to the extent that the EPA finds, after signing this CAFO, that any information provided by Respondent

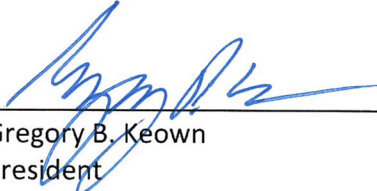
was materially false or inaccurate at the time such information was provided to the EPA, and to assess and collect any civil penalties permitted by statute for any violation described herein. The EPA will give Respondent written notice of its intent to revoke this CAFO, which will not be effective until received by Respondent.

H. Effective Date

73. This CAFO will be effective after the Regional Judicial Officer executes the attached Final Order, on the date of filing with the Regional Hearing Clerk. Upon filing, the EPA will transmit a copy of the filed CAFO to Respondent.

Wieland Rolled Products North America, LLC, Respondent

6/5/25
Date


Gregory B. Keown
President
Wieland Rolled Products North America, LLC

United States Environmental Protection Agency, Complainant

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 5

Consent Agreement and Final Order

In the Matter of: Wieland Rolled Products North America, LLC,

Docket No. CAA-05-2025-0013

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.

Date

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