



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
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Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

MAY 17 2007

OHJ 987046232

Bohn-Jur Co.

c/o John Jurich
7201 McKenna Place
Englewood, Ohio 45322

Certified Mail

RE: Proposed Director's Final Findings and Orders

Dear Mr. Jurich:

I have been informed of hazardous waste violations that occurred at Master Vision Plating, LLC (Master Vision) facility located at 5311 Webster Street in Dayton, Ohio (Facility). These violations were discovered during an August 16, 2006 complaint investigation. Because of the seriousness of the violations and because Bohn-Jur Co. (Bohn-Jur) is the property owner of the Facility, Ohio EPA believes that an enforcement action with a civil penalty settlement is necessary. I am optimistic that we can resolve this matter amicably and expeditiously through consensual administrative Director's Final Findings and Orders. A resolution through Director's Final Findings and Orders would avoid the time and expense associated with litigation upon referral of this matter to the Ohio Attorney General.

Attached, please find proposed Director's Final Findings and Orders and a summary of the civil penalty settlement calculation. Please take the time to review these documents. The Director's Final Findings and Orders, as proposed, require Master Vision and Bohn-Jur to pay a \$40,200 civil penalty settlement. Part of this civil penalty settlement goes toward a supplemental environmental project (SEP) involving a monetary contribution to the Ohio EPA Clean Diesel School Bus Program. This SEP funds the purchase and installation of diesel particulate filters and crankcase filters on qualifying school buses. This retrofitting program reduces emissions of particulate emissions, organic compounds, and carbon monoxide. Also attached is an information sheet which has been designed as an aid to help you understand the administrative enforcement process. The information sheet includes answers to questions commonly posed by persons involved in the administrative enforcement process.

If Bohn-Jur is willing to accept the Director's Final Findings and Orders, as written, please contact Elissa Miller of Ohio EPA's Legal Office at (614) 644-3037 within fourteen (14)

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Mr. John Jurich
Bohn-Jur Co.
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days of Bohn-Jur's receipt of this letter. If Bohn-Jur is unwilling to accept the Director's Final Findings and Orders as written, I encourage you to pursue the possibilities of settlement through a settlement meeting or telephone conference. Prior to any settlement meeting or telephone conference, you should provide a written response to the proposed Director's Final Findings and Orders that clearly and directly explains Bohn-Jur's position regarding **Section IV., Findings** and **Section V., Orders**. It would be helpful if in the response, Bohn-Jur presented the circumstances or arguments that Bohn-Jur believes constitute grounds for defense, if any, and the facts Bohn-Jur believes should be considered by Ohio EPA in determining whether to mitigate the proposed civil penalty settlement. When preparing your written response, I ask that you do so in reference to the civil penalty summary sheet attached to the Director's Final Findings and Orders.

If Bohn-Jur desires to hold a settlement meeting or telephone conference, please contact Elissa Miller at the telephone number above within fourteen (14) days after Bohn-Jur's receipt of this letter. If Bohn-Jur declines to enter into consensual Director's Final Findings and Orders or does not respond to this letter within the fourteen (14) day time frame, I will deem this offer withdrawn and I will consider other enforcement alternatives including referral of this matter to the Ohio Attorney General.

Because this letter and the attached documents summarize a proposed settlement, I consider them inadmissible by Bohn-Jur for any purpose in any enforcement action that the state may take should Bohn-Jur decline this offer.

Sincerely,



Chris Korleski
Director

cc: Michael Savage, Chief, DHWM
Tom Winston, Chief, SWDO
Elissa Miller, Legal

Attachments

**BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY**

In the Matter of:

Master Vision Plating, LLC
5311 Webster Street
Dayton, Ohio 45414

**Director's Final
Findings and Orders**

and

Bohn-Jur Co.
7201 McKenna Place
Englewood, Ohio 45322

Respondents

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to Master Vision Plating, LLC (Respondent Master Vision) and Bohn-Jur Co. (Respondent Bohn-Jur) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) §§ 3734.13 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent Master Vision and Respondent Bohn-Jur and successors in interest liable under Ohio law. No change in ownership of Respondent Master Vision or Respondent Bohn-Jur or of the Facility shall in any way alter Respondent Master Vision's and Respondent Bohn-Jur's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3734. and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Respondent Master Vision and Respondent Bohn-Jur are each a "person" as defined in ORC § 3734.01(G) and Ohio Administrative Code (OAC) rule 3745-50-10(A).
2. In October 2005, Respondent Master Vision purchased the plating business formerly known as Dayton Alloy Wheel Properties, LLC dba The Plate Rite Company. The business is located at 5311 Webster Street, Dayton, Montgomery County (Facility). Respondent Master Vision is a limited liability company licensed to do business in Ohio on December 23, 2005. Respondent Bohn-Jur owns the property located at 5311 Webster Street, Dayton, Montgomery County.
3. On August 16, 2006, Ohio EPA conducted a complaint investigation at the Facility to investigate the alleged mismanagement of hazardous waste. During the complaint investigation, Ohio EPA observed approximately ninety 55-gallon containers of unknown waste and material being stored outside behind the Facility. Ohio EPA was informed by Respondent Master Vision that these containers were on-site at the time of the sale in October 2005 and not generated by Respondent Master Vision.
4. By facsimile dated September 5, 2006, Respondent Master Vision provided a waste profile sheet to Ohio EPA that identified seventy-six of the ninety 55-gallon containers referenced in Finding No. 3. of these Orders as containing waste chromic acid and being characteristically hazardous for chromium (D007) and corrosivity (D002).
5. On September 14, 2006, Respondent Master Vision manifested the seventy-six containers of hazardous waste off-site to Vickery Environmental, Inc., a permitted hazardous waste disposal facility.
6. Based upon the fact that hazardous wastes were unlawfully stored at the facility as referenced in Finding Nos. 2. through 5. of these Orders, Respondent Master Vision is an operator of an unpermitted storage facility and Respondent Bohn-Jur is the owner of an unpermitted storage facility.
7. By letter dated September 27, 2006, Ohio EPA notified Respondent Master Vision that based upon the complaint investigation referenced in Finding No. 3. of these Orders, Respondent Master Vision had, *inter alia*, stored hazardous waste without a permit for greater than 90 days, in violation of

ORC § 3734.02 (E) and (F), failed to evaluate wastes to determine if the waste was hazardous waste, in violation of OAC rule 3745-52-11 and failed to comply with numerous large quantity generator (LQG) regulations, in violation of OAC rule 3745-52-34. In this letter, Ohio also notified Respondents that due to the unlawful storage of hazardous waste, Respondent Master Vision was subject to all applicable general facility standards found in OAC Chapters 3745-54 and 3745-55.

8. The Director has determined that, because Respondent Master Vision did not generate the hazardous wastes referenced in Finding Nos. 3. and 4. of these Orders and Respondent Master Vision was not a LQG at the time of the August 16, 2006 complaint investigation, the OAC rule 3745-52-11 violation and the large quantity generator violations cited in the September 27, 2006 letter were not violations and are therefore rescinded. However, the Director has determined that because Respondent Master Vision is an operator of an unpermitted hazardous waste storage facility, Respondent Master Vision stored hazardous waste without a permit, in violation of ORC § 3734.02 (E) and (F), failed to analyze wastes in accordance with OAC rule 3745-54-13 and failed to comply all applicable general facility standards found in OAC Chapters 3745-54 and 3745-55.
9. The Director has determined that because Respondent Bohn-Jur is an owner of an unpermitted hazardous waste storage facility, Respondent Bohn-Jur stored hazardous waste without a permit, in violation of ORC § 3734.02 (E) and (F), failed to analyze wastes in accordance with OAC rule 3745-54-13 and failed to comply all applicable general facility standards found in OAC Chapters 3745-54 and 3745-55.

V. ORDERS

Respondent Master Vision and Respondent Bohn-Jur shall achieve compliance with Chapter 3734. of the ORC and the regulations promulgated thereunder according to the following compliance schedule:

1. Within 60 days after the effective date of these Orders, Respondent Master Vision and Respondent Bohn-Jur shall submit to Ohio EPA, for review and approval, a sampling and analysis plan (SAP) for sampling activities to determine the rate and extent of contamination, if any, for the hazardous waste storage area, referenced in Finding Nos. 3. and 6. of these Orders.
2. The SAP is subject to Ohio EPA review and approval. If Ohio EPA does not approve the SAP and provides Respondent Master Vision and Respondent Bohn-Jur with a written statement of deficiencies, Respondent Master Vision

and Respondent Bohn-Jur shall revise the SAP or submit a new SAP for approval that corrects the stated deficiencies within 30 days after receipt of such written statement. Ohio EPA may approve the SAP with modifications. If Ohio EPA modifies the SAP, the modified SAP becomes the approved SAP. Upon Respondent Master Vision's and Respondent Bohn-Jur's receipt of approval from Ohio EPA of the SAP, Respondent Master Vision and Respondent Bohn-Jur shall implement the approved SAP in accordance with the terms, conditions and schedules contained therein.

3. Following receipt of the analytical results generated by the implementation of the approved SAP, Respondent Master Vision and Respondent Bohn-Jur shall, pursuant to the schedule in the approved SAP, submit to Ohio EPA a report (SAP Report) that includes the laboratory analysis and evaluation of data generated from implementing the approved SAP. Using the format found in OAC rule 3745-50-42(D), Respondent Master Vision and Respondent Bohn-Jur shall certify that the sampling and analysis were conducted in accordance with the approved SAP. The certification shall be signed by Respondent Master Vision and Respondent Bohn-Jur and shall be included in the SAP Report.
4. The SAP Report is subject to Ohio EPA review and approval. If Ohio EPA approves the SAP Report and it indicates that soil, but not ground water, has been contaminated by hazardous waste or hazardous waste constituents above the remediation levels identified in Ohio EPA's "Closure Plan Review Guidance" dated June 2005, as supplemented, as a result of hazardous waste treated and disposed at the Facility without a permit, in violation of ORC § 3734.02(E) and (F) and the rules promulgated thereunder, Respondent Master Vision and Respondent Bohn-Jur shall prepare a Remediation Plan and comply with Order Nos. 5. through 8.
5. The Remediation Plan shall be submitted to Ohio EPA within 30 days after Ohio EPA's approval of the SAP Report. The Remediation Plan shall propose methods of and a schedule for remediation of the areas at the Facility where hazardous waste was stored without a permit, in violation of ORC § 3734.02(E) and (F) and the rules promulgated thereunder.
6. The Remediation Plan is subject to Ohio EPA review and approval. If Ohio EPA does not approve the Remediation Plan and provides Respondent Master Vision and Respondent Bohn-Jur with a written statement of deficiencies, Respondent Master Vision and Respondent Bohn-Jur shall revise the Remediation Plan or submit a new Remediation Plan for approval that corrects the stated deficiencies within 30 days after receipt of such written statement.

7. Upon receipt of Ohio EPA's approval of the Remediation Plan, Respondent Master Vision and Respondent Bohn-Jur shall implement the Remediation Plan in accordance with the requirements of OAC rules 3745-55-11/3745-66-11 and OAC rules 3745-55-14/3745-66-14 and the specifications and schedules contained in the approved Remediation Plan and any conditions attached thereto.
8. Within 60 days after the completion of work required by the approved Remediation Plan, Respondent Master Vision and Respondent Bohn-Jur shall submit to Ohio EPA, for review and approval, a certification that the remediation work was conducted in accordance with the approved Remediation Plan. The certification shall be signed by Respondent Master Vision and Respondent Bohn-Jur using the format found in OAC rule 3745-50-42(D).
9. If Ohio EPA accepts the SAP Report and it indicates that both soil and ground water have been contaminated by hazardous waste, hazardous waste constituents or hazardous waste decomposition products above the remediation levels identified in Ohio EPA's "Closure Plan Review Guidance" dated June 2005, as supplemented, as a result of hazardous waste unlawfully stored at the Facility without a permit, in violation of ORC § 3734.02(E) and (F) and the rules promulgated thereunder, Respondent Master Vision and Respondent Bohn-Jur shall submit to Ohio EPA a closure plan prepared in accordance with OAC rules 3745-55-11/3745-66-11 through 3745-55-20/3745-66-20, and comply with Order Nos. 10. through 13.
10. The closure plan shall be submitted to Ohio EPA within 30 days after Respondent Master Vision's and Respondent Bohn-Jur's receipt of Ohio EPA's approval of the SAP Report. The closure plan is subject to Ohio EPA approval. If Ohio EPA does not approve the closure plan and provides Respondent Master Vision and Respondent Bohn-Jur with a written statement of deficiencies, Respondent Master Vision and Respondent Bohn-Jur shall, within 30 days after receipt of such written statement, revise the closure plan or submit a new closure plan to Ohio EPA addressing the deficiencies. Upon receipt of Respondent Master Vision's and Respondent Bohn-Jur's new or revised closure plan, Ohio EPA will notify Respondent Master Vision and Respondent Bohn-Jur in writing that Ohio EPA either approves the closure plan or approves the closure plan with modifications. If Ohio EPA modifies the closure plan, the modified closure plan shall become the approved closure plan.

11. Upon receiving Ohio EPA's written approval of the closure plan, Respondent Master Vision and Respondent Bohn-Jur shall implement the approved closure plan pursuant to OAC rules 3745-55-11/3745-66-11 through 3745-55-20/3745-66-20, the specifications and schedules contained in the approved closure plan, and any modifications attached to the approved closure plan.
12. Within 60 days after completion of closure, Respondent Master Vision and Respondent Bohn-Jur shall submit to Ohio EPA a closure certification in accordance with OAC rules 3745-55-15/3745-66-15.
13. Within 30 days after submitting the closure plan referenced in Order No. 9., Respondent Master Vision and Respondent Bohn-Jur shall submit to Ohio EPA a closure cost estimate and documentation demonstrating that Respondents has established financial assurance and liability coverage for the area of the Facility subject to closure in accordance with OAC rules 3745-55-42/3745-66-42 through 3745-55-47/3745-66-47. Completion of Order Nos. 1. through 13. will abate the violations referenced in Finding Nos. 7., 8. and 9. of these Orders.
14. Respondent Master Vision and Respondent Bohn-Jur shall pay Ohio EPA the amount of \$40,200.00 in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 3734., in accordance with the following provisions:
 - a. Within 30 days after the effective date of these Orders, Respondent Master Vision and Respondent Bohn-Jur shall pay Ohio EPA the amount of \$32,200.00 in settlement of Ohio EPA's claims for civil penalties which will be deposited into the hazardous waste cleanup fund established pursuant to ORC § 3734.28. Payment shall be made by an official check made payable to "Treasurer, State of Ohio" for \$32,200.00. The official check shall be submitted to Ohio EPA, Office of Fiscal Administration, Department L-2711, Columbus, Ohio 43260-2711, together with a letter identifying Respondents. A copy of this check shall be submitted in accordance with Section X. of these Orders.
 - b. In lieu of paying the remaining \$8,000.00 of civil penalty to Ohio EPA, Respondent Master Vision and Respondent Bohn-Jur shall fund a supplemental environmental project (SEP) by making a contribution in the amount of \$8,000.00 to the Ohio EPA Clean Diesel School Bus Program (Fund 5CD). Respondents shall make the payment within 30 days after the effective date of these Orders by tendering an

official check made payable to "Treasurer, State of Ohio" for \$8,000.00. The official check shall be submitted to Brenda Case, or her successor, Ohio EPA, Office of Fiscal Administration, Department L-2711, Columbus, Ohio 43260-2711, together with a letter identifying Respondents. A copy of this check shall be submitted in accordance with Section X. of these Orders, and an additional copy of this check shall be sent to James A. Orlemann, Assistant Chief, SIP Development and Enforcement, or his successor, Ohio EPA, Division of Air Pollution Control, P.O. Box 1049, Columbus, Ohio 43216-1049.

- c. Should Respondent Master Vision and Respondent Bohn-Jur fail to fund the SEP within the required time frame established in Order No. 14.b. of these Orders, Respondents shall pay to Ohio EPA within 7 days of failing to comply with Order No. 14.b. the amount of \$8,000.00 in accordance with the procedures in Order No. 14.a.

VI. TERMINATION

Respondent Master Vision's and Respondent Bohn-Jur's obligations under these Orders shall terminate when Respondent Master Vision and Respondent Bohn-Jur certify in writing and demonstrate to the satisfaction of Ohio EPA that Respondent Master Vision and Respondent Bohn-Jur have performed all obligations under these Orders and Ohio EPA's Division of Hazardous Waste Management acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent Master Vision and Respondent Bohn-Jur of the obligations that have not been performed, in which case Respondent Master Vision and Respondent Bohn-Jur shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent Master Vision and Respondent Bohn-Jur to Ohio EPA and shall be signed by a responsible official of Respondent Master Vision and Respondent Bohn-Jur. For purposes of these Orders, a responsible official is a person who is in charge of a principal business function of Respondent Master Vision and Respondent Bohn-Jur.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, the operation of Respondent Master Vision and Respondent Bohn-Jur.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent Master Vision and Respondent Bohn-Jur.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent Master Vision and Respondent Bohn-Jur pursuant to these Orders shall be addressed to:

Ohio Environmental Protection Agency
Southwest District Office
Division of Hazardous Waste Management
401 East Fifth Street
Dayton, Ohio 45402-2911
Attn: DHWM Manager

and Ohio EPA Central Office at the following address:

For mailings, use the post office box number:

Chris Korleski, Director
Ohio Environmental Protection Agency
Lazarus Government Center
Division of Hazardous Waste Management
P.O. Box 1049

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Master Vision Plating, LLC and Bohn-Jur Co.
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Columbus, Ohio 43216-1049
Attn: Manager, Compliance Assurance Section

For deliveries to the building:

Chris Korleski, Director
Ohio Environmental Protection Agency
Lazarus Government Center
Division of Hazardous Waste Management
50 West Town Street, Suite 700
Columbus, Ohio 43215
Attn: Manager, Compliance Assurance Section

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

XI. RESERVATION OF RIGHTS

Ohio EPA reserves its rights to exercise its lawful authority to require Respondent Master Vision and Respondent Bohn-Jur to perform corrective action at the Facility at some time in the future, pursuant to ORC Chapter 3734. or any other applicable law. Respondent Master Vision and Respondent Bohn-Jur reserve its rights to raise any administrative, legal or equitable claim or defense with respect to any final action of the Director regarding such corrective action. Ohio EPA , Respondent Master Vision and Respondent Bohn-Jur each reserve all other rights, privileges and causes of action, except as specifically waived in Section XII. of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, Respondent Master Vision and Respondent Bohn-Jur consent to the issuance of these Orders and agrees to comply with these Orders. Except for the right to seek corrective action at the Facility by Respondent Master Vision and Respondent Bohn-Jur, which right Ohio EPA does not waive, compliance with these Orders shall be a full accord and satisfaction for Respondent Master Vision's and Respondent Bohn-Jur's liability for the violations specifically cited herein.

Respondent Master Vision and Respondent Bohn-Jur hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent Master Vision and Respondent Bohn-Jur hereby waive any and all rights Respondent Master Vision and Respondent Bohn-Jur may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA, Respondent Master Vision and Respondent Bohn-Jur agrees that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent Master Vision and Respondent Bohn-Jur retain the right to intervene and participate in such appeal. In such an event, Respondent Master Vision and Respondent Bohn-Jur shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency

Chris Korleski
Director

Date

IT IS SO AGREED:

Master Vision Plating, LLC

Signature

Date

Printed or Typed Name

Title

Bohn-Jur Co.

Signature

Date

Printed or Typed Name

Title

Hazardous Waste Civil Penalty Sheet

Company Name: Master Vision Plating, LLC and Bohn-Jur Company

Citation	Description	Potential For Harm	Extent Of Deviation	Gravity Penalty	Days/Events in Violation	Multi-Event Penalty	Economic Benefit	Adjustments	Total Penalty
ORC § 3734.02(E) & (F) and OAC Chapters 3745-54 and 3745-55	Unlawfully stored hazardous waste without a hazardous waste permit and failed to comply with TSD requirements.	Moderate	Major	\$4,400	180	\$35,800 (179 days x \$200 per day)	NA	NA	\$40,200
Total Penalty:									\$40,200

COVER MEMO

- (X) Director's Signature
- () Assistant Director's Signature
- () DRAFT - Governor's Signature
- () Deputy Director's Signature
- () Background Investigation Report - CONFIDENTIAL

Subject: (MCR# _____) Proposed DFF&Os - **Master Vision Plating, LLC and Bohn-Jur Co.**

Prepared by: Elissa Miller and Jim Kavalec Division: Legal/DHWM Date: April 10, 2007

Blind Copies: _____

NECESSARY APPROVALS	APPROVED BY	DATE
(X) Assistant Director	_____	<u> / / </u>
() Deputy Director, Legal Affairs	_____	<u> / / </u>
() Deputy Director, Communication	_____	<u> / / </u>
() Director's Office, Rules Coordinator	_____	<u> / / </u>
(X) Legal	<u>Elissa Miller</u>	<u>4/10/07</u>
(X) Other <u>Todd Anderson</u>	<u>Todd Anderson</u>	<u>5/7/07</u>
() Other	_____	<u> / / </u>

District Personnel Information		Division Personnel Information	
Approvals:	Date:	Approvals:	Date:
Supervisor _____	<u> / / </u>	Unit Supervisor <u>John Schlegel</u>	<u>4/18/07</u>
Manager _____	<u> / / </u>	Section Manager <u>Henry E.</u>	<u>4/23/07</u>
Assistant Dist. Chief _____	<u> / / </u>	Assistant Chief _____	<u> / / </u>
District Chief _____	<u> / / </u>	Chief <u>Michael Jones</u>	<u>5/2/07</u>
Other _____	<u> / / </u>	Other _____	<u> / / </u>

RETURN ALL SUPPORTING DOCUMENTS TO:

Name: Elissa Miller Division: Legal (5th Floor)

Document Name: _____ WPS Initials/Date: _____

Attachments: CC: Yes No BC: Yes No

Other: _____