



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

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December 13, 2007

Certified Mail

Allen J. Francis

President

Production Paint Finishers, Inc.

PO Box 127, 140 Center Street

Bradford, OH 45308

NOTICE OF VIOLATION - HPV - GC1

Summary:

On November 19, 2007, the Regional Air Pollution Control Agency (RAPCA) performed a compliance evaluation at Production Paint Finishers (Production Paint). During the inspection, RAPCA documented that Production Paint physically modified K005 and K006 prior to obtaining a Permit to Install (PTI) and a Prevention of Significant Deterioration (PSD) permit. Production Paint has also: failed to comply with state and local volatile organic compound (VOC) restriction for coatings employed in K001, failed to submit quarterly and semi-annual Title V reports by the required dates, failed to submit 30-day deviation reports as required for emissions units K001 and K006, failed to comply with the hourly volatile organic compound (VOC) emissions limit in K005, and failed to submit the Initial Notification form required by 40 CFR Part 63 Subpart PPPP by the required date. Enforcement orders may be issued in the future to resolve these violations.

Dear Mr. Francis:

On November 19, 2007, RAPCA performed a compliance inspection at Production Paint, Ohio EPA facility ID 0819030169. The purpose of the inspection was to determine if Production Paint was operating in compliance with all applicable rules and regulations. During the inspection, RAPCA documented that emissions units K005 - Paint Spray Booth # 5 and K006 - Heavy Components Line with drying oven had been physically modified prior to Production Paint obtaining a PTI. K005 is permitted under PTI 08-03529, issued on June 5, 1996, which limits K005 to 9.62 pounds per hour (lbs/hr), 0.83 tons per month, and 10.01 tons per year (TPY) VOC emissions, including cleanup and the Title V permit, effective on June 12, 1997, which limits K005 to 0.83 tons per month and 10.01 TPY VOC emissions, including cleanup. K006 is permitted under PTI 08-04705, issued on October 25, 2005, which limits K006 to 430 pounds per day (lbs/day) and 37.3 TPY of organic compounds (OC), excluding cleanup material and 4.0 TPY OC from cleanup material.

On September 24, 2007, Production Paint submitted in writing their intent to physically modify K005 to coat Mine Resistant Ambush Protection (MRAP) vehicles and to obtain a synthetic

minor PSD permit. However, no permit application was ever received by RAPCA.

On March 27, 2007, RAPCA issued Production Paint a Notice of Violation (NOV) addressing several violations, including the failure to obtain a PSD permit and failure to comply with Ohio Administrative Code (OAC) rule and the Darke County Board of Health Air Pollution Control Regulations (DCBHAPCR) rule 3745-21-09(U). RAPCA has reevaluated these violations and, based on correspondence and documentation provided by Production Paint on February 14, 2007, July 13, 2007, and September 26, 2007, developed the following facility-wide potential to emit (PTE).

Table 1: Potential to Emit

| Year | Emissions Unit | Emissions Unit PTE (TPY VOC) | Facility PTE and Major Source Evaluation (TPY VOC) |
|------|--|------------------------------|--|
| 1977 | K001 (2 booths) | 135 ¹ | 135 > 100 TPY for OAC rule 3745-21-09(U) applicability |
| 1981 | K001 (3 booths, using 3.5 lbs VOC/gal ²) | 88 ³ | 88 |
| 1989 | K004 & K005 | 11 each ⁴ | 88 + 22 = 110 |
| 1991 | K001 (added 2 guns) | 170 ⁵ | 170 + 22 = 192 |
| 1995 | K006 (installed 1997) | 19 ⁶ | 192 + 19 = 211 |
| 2000 | K001 (removal of Booth 3) | 163 ⁷ | 163 + 22 + 19 = 204 |
| 2004 | K006 (added oven) | 72 ⁸ | 163 + 22 + 72 = 257 > 250 TPY, major source for NSR |
| 2007 | K006 (added 2 guns) | 144 ⁹ | 144 - 20 ¹⁰ = 124, > 40 TPY major modification threshold |
| 2007 | K005 (modification) | 58 ¹¹ | 58 - 2.26 ¹² = 55.74, > 40 TPY major modification threshold |

¹ Booths 1 & 2 = (127.5 gals/day)(5.81 lbs/gal VOC)(365 days/yr)/(2000 lbs/ton), not including cleanup material

² In 1981, OAC rule 3745-21-09(U) came into effect, limiting the coating content to 3.5 lbs VOC/gal

³ Booths 1 & 2 + Booth 3 = (127.5 gals/day)(3.5 lbs/gal VOC)(365 days/yr)/(2000 lbs/ton) +

(8oz/min)(gal/128 oz)(60 min/hr)(1000 hr/yr)(3.5 lbs/gal)/(2000 lbs/ton), not including cleanup material

⁴ (60 lb/day)(365 day/yr)/(2000 lbs/ton)

⁵ (255 gals/day)(3.5 lbs/gal VOC)(365 days/yr)/(2000 lbs/ton) + (8 oz/min)(gal/128 oz)(60 min/hr)(1000 hr/yr)(3.5 lbs/gal)/(2000 lbs/ton), not including cleanup material. 255 gals/day is maximum actual coating rate in 2006.

⁶ (103 lbs/day)(365 days/yr)/(2000 lbs/ton)

⁷ (255 gals/day)(3.5 lbs/gal VOC)(365 days/yr)/(2000 lbs/ton)

⁸ (112.5 gals/day)(3.5 lbs/gal VOC)(365 days/yr)/(2000 lbs/ton). 112.5 gals/day is half of the maximum actual coating rate in 2006 (225 gals/2).

⁹ (225 gals/day)(3.5 lbs/gal VOC)(365 days/yr)/(2000 lbs/ton)

¹⁰ 20 tons is the average of the actual emissions in 2005 and 2006 based on annual reports submitted by Production Paint.

¹¹ [(2.25 gals/vehicle)(10 vehicles/day)(4.0 lbs/gal VOC) + (6.5 gal/vehicle)(10 vehicles/day)(3.5 lbs/gal VOC)](365 days/yr)/(2000 lbs/ton)

¹² 2.26 tons is the average of the actual emissions in 2005 and 2006 based in annual reports submitted by Production Paint.

The purpose of this letter is to provide Production Paint with RAPCA's reevaluation of the March 27, 2007 NOV and with notification of additional violations that have been documented by RAPCA since the March 27, 2007 NOV.

VIOLATIONS

I. Failure to Obtain a PTI Modification

Pursuant to PTI 08-04705, K006 is limited to 430 lbs/day OC and 37.3 TPY OC, excluding cleanup material and 4.0 TPY OC from cleanup material. These allowable limits were based on a maximum of 2 spray guns being employed in K006, which at the time was thought to be the PTE for K006. This information was consistent with what was provided in correspondence from Production Paint dated July 26, 2005 and July 13, 2007. However, the July 13, 2007 correspondence also states that the facility is currently employing 4 guns in K006.

Pursuant to PTI 08-03529, K005 is limited to 9.62 lbs/hr, 0.83 tons per month, and 10.01 TPY VOC, including cleanup. The Title V permit limits K005 to 0.83 tons per month and 10.01 TPY VOC, including cleanup. These allowable limits are based on the PTE for K005 and a maximum of 2 spray guns being employed in K005, as stated in the correspondence from Production Paint dated July 13, 2007.

During the November 19, 2007 inspection, RAPCA documented that modifications had been made to both K005 and K006. Specifically, RAPCA documented that the facility was employing at least 4 spray guns in K006, part of the conveyer for K005 had been removed so that MRAP vehicles could be coated in the booth, and that the facility was employing 2 spray guns and a

coating wand in K005. Production Paint stated that the facility currently coats 8 MRAP vehicles per day with plans to coat at least 10 MRAP vehicles per day in the near future. Each vehicle requires approximately 2.25 gallons of zinc rich primer, 4.5 gallons of an epoxy primer, and 2 gallons of a topcoat. Thus, each MRAP vehicle requires at least 8.75 gallons of coating.

The addition of 2 spray guns to K006 increased the emissions to 144 TPY VOC $[(225 \text{ gals/day})(3.5 \text{ lbs VOC/gal coating})(365 \text{ days/yr})/(2000 \text{ lbs/ton})]$ versus the permitted limit of 37.3 TPY. Therefore RAPCA has determined the addition of 2 guns is a physical modification of K006 that resulted in an emissions increase.

The removal of part of the conveyor in K005 is a physical modification of this unit. As noted during the inspection, the MRAP units are coated with zinc rich primer, epoxy primer and topcoat. Pursuant to OAC rule and DCBHAPCR rule 3745-21-09(U), zinc rich primer is limited to 4.0 lbs/gal VOC and the other coatings employed by Production Paint are limited to 3.5 lbs/gal VOC. Based on the VOC content allowed under this rule and the amount of coatings applied per MRAP unit, the emissions for K005 after the modification are 58 TPY VOC $[(2.25 \text{ gals/vehicle})(10 \text{ vehicles/day})(4.0 \text{ lbs VOC/gal coating}) + (6.5 \text{ gal/vehicle})(10 \text{ vehicles/day})(3.5 \text{ lbs VOC/gal coating})](365 \text{ days/yr})/(2000 \text{ lbs/ton})]$ versus the permitted limit of 10.01 TPY. Thus, the physical modification of K005 to allow for the coating of MRAP vehicles resulted in an emissions increase.

Pursuant to OAC rule and DCBHAPCR rule 3745-31-02(A)(1), no person shall cause, permit, or allow the modification of an air contaminant source, without first obtaining a PTI. To date, no PTI application has been received by RAPCA for the modifications of K005 and K006. Failure to obtain PTI modifications prior to making physical changes that results in an emissions increase is a violation of OAC rule and DCBHAPCR rule 3745-31-02(A)(1) and Ohio Revised Code (ORC) 3704.05.

II. Failure of K001 to comply with OAC rule and DCBHAPCR rule 3745-21-09(U)

Pursuant to OAC rule and DCBHAPCR rule 3745-21-09(A)(3), the requirements of OAC rule and DCBHAPCR rule 3745-21-09(U) shall apply to sources that were constructed or modified on or after March 27, 1981 or are located at a facility having a PTE greater than 100 TPY VOC. On February 14, 2007, August Mack Environmental, on behalf of Production Paint, submitted to RAPCA, via email, a PTE analysis for VOC emissions in K001. The PTE analysis provided is based on the highest actual coating usage rate achieved for K001 in 2006 of 255 gals/day. On July 13, 2007, Production Paint provided documentation that in 1991, the number of spray guns in K001 increased from 2 to 4. As such, RAPCA has determined that prior to 1991, Production Paint had the capability to use at least 127.5 gals/day of coating in K001 (255 gals/2). When K001 was installed in 1977, the maximum VOC content of coating in use contained 5.81 lbs VOC/ gallon of coating. Therefore, the PTE of K001 in 1977 was at least 135 TPY $[(127.5 \text{ gals/day})(5.81 \text{ lbs VOC/gal coating})(365 \text{ days/yr})/(2000 \text{ lbs/ton})]$, not including cleanup

materials, and K001 was subject to OAC rule and DCBHAPCR rule 3745-21-09(U) on March 27, 1981.

Pursuant to OAC rule and DCBHAPCR rule 3745-21-04(C)(28), any owner or operator of a miscellaneous metal part or product coating line which is subject to the requirements of OAC rule and DCBHAPCR rule 3745-21-09(U) shall achieve compliance with OAC rule and DCBHAPCR rule 3745-21-09(U) by December 31, 1982. Compliance is achieved by the use of compliant coatings and/or the installation of a control system. Production Paint did not install a control system and did not use compliant coatings until PTI 08-047345 was issued on March 30, 2006.

Pursuant to OAC rule and DCBHAPCR rule 3745-21-04(B)(1), the owner or operator of a source subject to OAC rule and DCBHAPCR rule 3745-21-09(U) shall either certify in writing to the director by no later than April 1, 1981 that such source is in compliance with all requirements of OAC rule and DCBHAPCR rule 3745-21-09 or shall submit an application for a permit to operate (PTO) or an application for a modification to a PTO in accordance with OAC rule and DCBHAPCR rule 3745-35-02 which includes a compliance program that would bring the source into compliance with all the requirements of OAC rule and DCBHAPCR rule 3745-21-09 by December 31, 1982. No such certification or compliance plan was submitted by Production Paint by April 1, 1981.

Based on the facility PTE of 135 TPY VOC in 1977, Production Paint was required to comply with OAC rule and DCBHAPCR rule 3745-21-09(U) by December 31, 1982 and was required to certify compliance with OAC rule and DCBHAPCR rule 3745-21-09(U) or submit a compliance plan by April 1, 1981. Failure to comply with OAC rule and DCBHAPCR rule 3745-21-09(U) and failure to certify compliance with OAC rule and DCBHAPCR rule 3745-21-09(U) is a violation of OAC rule and DCBHAPCR rule 3745-21-09(U), OAC rule and DCBHAPCR rule 3745-21-04(B)(1), and ORC 3704.05.

III. Failure to Obtain PSD Permit Prior to Modifying K005 and K006

Darke County is designated as an attainment county for ozone. As such, the PSD threshold for VOC in Darke County is 250 TPY. RAPCA has determined that Production Paint exceeded the PSD threshold in 2004 with the installation of the drying oven onto K006 (see Table 1) and must evaluate each subsequent modification against the major New Source Review (NSR) permitting requirements for an attainment pollutant, i.e., the PSD permitting requirements, including the installation of Best Available Control Technology (BACT). RAPCA has determined that two major modifications have taken place since 2004: the installation of additional paint guns in K006 and the modification of K005 to allow for the coating of MRAP vehicles.

Based on the July 13, 2007 correspondence from Production Paint and confirmed during the November 19, 2007 compliance inspection, 2 additional spray guns were installed in K006 in

2007. Using the "actual-to-projected-actual emissions" applicability test, RAPCA evaluated the emissions increase as a result of the 2007 modification of K006. Based on annual reports submitted by Production Paint, the average of the actual emissions in 2005 and 2006 for K006, prior to any modifications taking place, were 20 TPY VOC. RAPCA has determined that the projected actual emissions, after the modification of K006, were 144 TPY VOC [(225 gals/day)(lbs VOC/gal coating)(365 days/yr)/(2000 lbs/ton)]. Therefore, this change resulted in a significant net emissions increase of 124 TPY VOC [144 TPY - 20 TPY], which exceeds the major modification threshold of 40 TPY VOC and subjects K006 to the PSD permitting requirements, including the installation of BACT.

Based on annual reports submitted by Production Paint, the average of the actual emissions in 2005 and 2006 for K005, prior to any modifications taking place, were 2.26 TPY VOC. Using the "actual-to-projected-actual emissions" applicability test, RAPCA evaluated the emissions increases as a result of the modification of K005. RAPCA has determined that the projected actual emissions, after the modification of K005 to allow for the coating of MRAP vehicles, were 58 TPY VOC [(2.25 gals/vehicle)(10 vehicles/day)(4.0 lbs VOC/gal coating) + (6.5 gal/vehicle)(10 vehicles/day)(3.5 lbs VOC/gal coating)](365 days/yr)/(2000 lbs/ton). Therefore, this change resulted in a significant net emissions increase of 55.74 TPY VOC [58 TPY - 2.26 TPY], which exceeds the major modification threshold of 40 TPY VOC and subjects K005 to the PSD permitting requirements, including the installation of BACT.

Failure to obtain a PSD permit and to install BACT prior to performing a major modification to a major source or facility subject to the PSD permitting regulations is a violation of OAC rules and DCBHAPCR rules 3745-31-01 through 3745-31-20 and ORC 3704.05.

IV. Failure to Submit Quarterly and Semi-Annual Title V Reports by the Required Dates

The Title V permit for Production Paint became effective on June 12, 1997. Pursuant to Part I - General Term and Condition A(I)(c)(ii) of the Title V permit, the permittee shall submit quarterly deviation reports by January 31, April 30, July 31, and October 31. Pursuant to OAC rule and DCBHAPCR rule 3745-77-07(A)(3)(c)(iii), the permittee shall submit semi-annual reports by January 31 and July 31. On September 26, 2007, RAPCA received a report, dated September 21, 2007, which contained the second quarter 2007 Title V report and semi-annual Title V report for the first half of 2007. To date RAPCA has not received a report for the first quarter of 2007. However, the report dated September 21, 2007 contains deviations that occurred during the first quarter, 2007 and it has been accepted as the first quarter 2007 deviation report. Failure to submit the quarterly and semi-annual Title V deviation reports by the dates specified is a violation of the Title V permit and ORC 3704.05.

V. Failure to Submit Deviation Reports for K001 and K006 by the Required Dates

K001 is permitted under PTI 08-04734, issued on March 30, 2006 and is limited to 640 pounds

lbs/day OC. K006 is permitted under PTI 08-04705, issued on October 25, 2005 and is limited to 430 lbs/day OC. Pursuant to Special Term and Condition IV.1 of PTI 08-04734 and PTI 08-04705, the permittee shall notify RAPCA in writing of any daily record showing:

- a. That the OC emissions from the emissions unit exceeded the allowable limit and the actual OC emission rate for each such day.
- b. The use of noncomplying coatings.
- c. The use of VOC cleanup materials.
- d. That the dry exhaust filtration system was not in use during operation of this emissions unit.

The notification, including the copy of such record, is required to be submitted within 30 days following the end of the calendar month during which the exceedance occurred.

On September 26, 2007 and November 2, 2007, RAPCA received quarterly Title V deviation reports for 2007 which identify 107 days during which the daily emissions from K001 exceeded the 640 lbs/day limit and 148 days during which the daily emissions from K006 exceeded the 430 lbs/day limit. Exceedances of the daily allowable emissions limit in K001 and K006 was included in the March 27, 2007 NOV issued to Production Paint and is therefore an ongoing violation. The first deviation for K001 and K006 occurred on January 2, 2007 and deviations occurred each month from January - September 2007. Therefore, the first deviation report was required to be submitted within 30 days of January 31, 2007 and subsequent deviation reports were required to be submitted within 30 days following the end of each calendar month in 2007. RAPCA has accepted the reports received on September 26, 2007 and November 2, 2007 as fulfillment of the 30-day deviation reporting requirement for January - September 2007. However, these reports did not include the actual OC emissions on the days during which the deviations occurred and are therefore incomplete. Additionally, Production Paint is delinquent in submitting the October deviation report which was due on November 30, 2007. Failure to submit deviation reports as specified in PTI 08-04705 and PTI 08-04734 is a violation of PTI 08-04705 and PTI 08-04734 and ORC 3704.05.

VI. Failure to Comply with the Hourly Emissions Rate in K005

K005 is permitted under PTI 08-03529, issued on June 5, 1996, which limits K005 to 9.62 lbs/hr VOC. The quarterly Title V deviation reports, received by RAPCA on September 26, 2007 and November 2, 2007, identify 26 days during which the hourly emissions from K005 exceeded 9.62 lbs/hr VOC. Failure to comply with the hourly emissions rate specified in PTI 08-03529 is a violation of PTI 08-03529 and ORC 3704.05.

VII. Failure to Submit the Initial Notification Required by 40 CFR Part 63 Subpart PPPP by the Required Date

On April 19, 2004, the USEPA promulgated the Surface Coating of Plastic Parts and Products Maximum Achievable Control Technology (MACT) Standard (40 CFR Part 63, Subpart PPPP).

This rule applies to a new, reconstructed or existing affected source at a facility that is a major source, is located at a major source, or is part of a major source of hazardous air pollutants (HAP) and uses 100 gallons per year or more of coatings that contain HAP to coat plastic parts or products (63.4481 and 63.4482). Existing sources are required to submit an Initial Notification form by April 19, 2005 (63.4510). On July 27, 2007 RAPCA requested that Production Paint address the applicability of the Surface Coating of Plastic Parts and Products MACT to the Production Paint facility and submit an Initial Notification form if required. On September 17, 2007, RAPCA received an Initial Notification form for 40 CFR Part 63 Subpart PPPP. Failure to submit the Initial Notification form required by 40 CFR Part 63 Subpart PPPP by the specified date is a violation of 40 CFR Part 63 Subpart PPPP.

ADDITIONAL ISSUES

During the November 19, 2007 compliance inspection, RAPCA documented 5 painters operating in K001. Correspondence from Production Paint dated July 13, 2007 and September 24, 2007 base the PTE of K001 on 4 spray guns employed. Additionally, during the inspection, it was unclear how many spray guns were employed in K006 and an unpermitted sealant application area was identified. The sealant application area employs a VOC containing sealant and may require an air permit. At this time, Production Paint is required to reevaluate the PTE for K001 and K006, calculate the PTE on the maximum number of spray guns each emissions unit is capable of accommodating, and submit a permit to install for the sealant application area.

The quarterly deviation reports received by RAPCA on September 26, 2007 and November 2, 2007 do not identify any deviations of the VOC content limit of the coatings applied in K006 - 3.5 lb/gal VOC, minus water and exempt solvents, as applied. If Production Paint applied a noncompliant coating in K006, the facility is required to identify all days during which the deviations occurred, regardless of whether the daily volume-weighted average of the VOC contents of the coatings was calculated to be less than 3.5 lbs VOC /gal coating, minus water and exempt solvents. At this time, RAPCA is requesting that Production Paint submit deviation reports for 2007 which identify all days during which noncompliant coatings were employed in K006.

COMPLIANCE PLAN

To address the violations listed above, RAPCA requires that Production Paint submit a compliance plan and schedule to bring the facility into compliance with all applicable air pollution control regulations. At a minimum, the compliance plan shall include: (1) a PSD permit application for K005 and K006 addressing the installation of BACT, (2) all daily records of production and paint usage for K005 since MRAP vehicles coating began, (3) the date the 2 additional spray guns were installed in K006, (4) the date K005 was modified to allow for MRAP vehicle coating, (5) revised deviation reports for 2007 that include the actual OC emissions from K001 and K006 on the days K001 and K006 exceeded the allowable limits, the maximum hourly

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emissions rate in K005 on the days K005 exceeded the hourly allowable limit, and any days during which noncompliant coatings were employed in K006, (6) 30-day deviation reports for K001 and K006 for October and November 2007, (7) a PTE determination for K001, K005, and K006 based on the maximum number of guns each unit is capable of accommodating, and (8) a permit to install application for the sealant application area. Please be aware that the PSD violations are ongoing violations that began when the facility performed the major modifications and will continue until BACT is installed on units K005 and K006.

Additionally, RAPCA requires that Production Paint address the violations identified in the March 27, 2007 NOV that are ongoing. These include the daily and annual OC emissions exceedances in K001 and K006 and exceedances of the VOC content limit in K006. In order to resolve these violations, Production Paint is required to modify the current permits.

The compliance plan and schedule shall be submitted expeditiously, but in no event later than thirty (30) days after receipt of this letter. Acceptance of the compliance plan and schedule by RAPCA does not constitute a waiver of the Ohio EPA's and RAPCA's authority to seek civil penalties as provided in section 3704.06 and 3707.49 of the Ohio Revised Code. The determination whether to pursue such penalties will be made by Ohio EPA and RAPCA at a later date.

If you have any questions regarding this matter, please contact Eileen Moran at (937) 225-4004 or me at (937) 496-7540.

Sincerely,



Jennifer S. Marsee
Supervisor, Abatement Unit
Regional Air Pollution Control Agency

cc: John Paul, RAPCA
Jefferis Canan, RAPCA
Michael Matis, MCCHD
Lisa Holscher, USEPA
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