



**ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In re R.S.A. Corp.

)
)
) Docket No. TSCA-HQ-2024-5001
)
)
)
)

FINAL ORDER

On December 26, 2024, the U.S. Environmental Protection Agency’s (“EPA’s”) Waste and Chemical Enforcement Division, Office of Civil Enforcement, Office of Enforcement and Compliance Assurance, filed a complaint against R.S.A. Corp. (“Respondent”) alleging that Respondent had violated Sections 8(b) and 13 of the Toxic Substances Control Act (“TSCA”), 15 U.S.C. §§ 2607(b) and 2612, as well as the Chemical Imports and Exports requirements and the Compilation of the TSCA Chemical Substance Inventory at 40 C.F.R. parts 707 and 710, thereby also violating Section 15 of TSCA, 15 U.S.C. § 2614. U.S. EPA Waste and Chemical Enforcement Division Complaint at 2 (Dec. 18, 2024). The Complaint sought a penalty of \$15,342.

EPA’s Consolidated Rules of Practice, codified at 40 C.F.R. part 22, govern this administrative enforcement proceeding. Pursuant to 40 C.F.R. § 22.18(a), a respondent may opt for a quick resolution of an enforcement proceeding at any time by paying the penalty proposed in the complaint. *See* 40 C.F.R. § 22.18(a)(1) and (2). The rules further provide that upon

payment in full of the penalty, in cases commenced at EPA Headquarters, the Environmental Appeals Board (“Board”) shall issue a final order. 40 C.F.R. § 22.18(a)(3).

On January 7, 2025, EPA’s Office of Enforcement and Compliance Assurance notified the Board that EPA has received a copy of the instrument of payment for the full amount of the penalty (\$15,342) from Respondent to resolve the above-captioned matter. Payment by Respondent constituted a waiver of its right to contest the allegations in the Complaint and to appeal this final order. *See* 40 C.F.R. § 22.18(a)(3). In accordance with 40 C.F.R. § 22.18(a)(3), the above-captioned matter is hereby **RESOLVED**.

So ordered.¹

ENVIRONMENTAL APPEALS BOARD

Date: January 13, 2025

By: Wendy L. Blake
Wendy L. Blake
Environmental Appeals Judge

¹ The three-member panel deciding this matter is composed of Environmental Appeals Judges Aaron P. Avila, Wendy L. Blake, and Mary Kay Lynch.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Final Order* in the matter of R.S.A. Corp., Docket No. TSCA-HQ-2024-5001, were sent to the following persons in the manner indicated:

By E-mail:

David Speranzini
Wiggin and Dana, LLP
265 Church St.
19th Floor
New Haven, CT 06510
Email: DSperanzini@wiggin.com

Alexander N. DerGarabedian, Attorney-Advisor
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Mail Code 2249A
Washington, DC 20460
E-mail: Dergarabedian.alexander@epa.gov

Headquarters Hearing Clerk
Office of Administrative Law Judges
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Mail Code 1900R
Washington, DC 20460
E-mail: OALJfiling@epa.gov; Angeles.Mary@epa.gov

Dated: Jan 13, 2025

Tommie Madison

Tommie Madison
Clerk of the Board