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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ENVIRONMENTAL APPEALS BOARD

IN THE MATTER OF

**VSS INTERNATIONAL, INC.**

3785 Channel Drive  
West Sacramento, CA

Respondent.

EAB DOCKET NO. CWA 20-02  
OALJ DOCKET NO. OPA 09-2018-0002

**RESPONDENT VSS INTERNATIONAL, INC.'S  
NOTICE OF ERRATA RE APPELLATE BRIEF  
FOLLOWING INITIAL DECISION AND ORDER**

**Original Appellate Brief filed on October 16, 2020**

Presiding Officer: Chief Administrative Law Judge  
Susan L. Biro

Date of Initial Decision and Order: September 16, 2020

Respondent VSS International, Inc.'s ("Respondent" or "Appellant") appeals brief in the above-referenced matter was filed on October 16, 2020 with the Appeals Board. Respondent respectfully submits this Notice of Errata Re Appellate Brief Following Initial Decision and Order to correct the following errors and corrections:

- (1) Pages i and ii, corrected the entire Table of Contents and Table of Authorities
- (2) Page 2, corrected the section number for Count I from "III.F" to "III.A"
- (3) Page 10, corrected the reference to "Section C" to "Section 3"
- (4) Page 13, deleted blank footnote 11 as the citation previously noted therein had been moved, and now precedes, the referenced quotation; and
- (5) Page 14, deleted "and a reduction of the penalty amount for the collective SPCC violations that eliminates the culpability penalty enhancement" and added "Count I (112.7) and" to the Conclusion.

Dated: October 19, 2020

CROWELL & MORING LLP



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Richard J. McNeil  
Attorneys for Respondent  
VSS INTERNATIONAL, INC

CERTIFICATE OF SERVICE

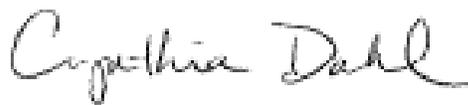
I, Cynthia Dahl, hereby certify that on October 19, 2020, I caused to be filed electronically, the foregoing **RESPONDENT VSS INTERNATIONAL, INC.'S NOTICE OF ERRATA RE APPELLATE BRIEF FOLLOWING INITIAL DECISION AND ORDER** in the Matter of VSS International, Inc., Docket No. CWA 20-02, using the EAB e filing system and on the Headquarters Hearing Clerk and Presiding Officer using the EAB e filing system.

Additionally, I, Cynthia Dahl, hereby certify that on October 19, 2020, I served a true and correct copy of the foregoing **RESPONDENT VSS INTERNATIONAL, INC.'S NOTICE OF ERRATA RE APPELLATE BRIEF FOLLOWING INITIAL DECISION AND ORDER** in the Matter of VSS International, Inc via electronic mail to the following attorneys for the EPA:

Rebecca Sugerman at [Sugerman.rebecca@epa.gov](mailto:Sugerman.rebecca@epa.gov)  
Rebekah Reynolds at [Reynolds.rebekah@epa.gov](mailto:Reynolds.rebekah@epa.gov)  
Andrew Hemlinger at [Helmlinger.andrew@epa.gov](mailto:Helmlinger.andrew@epa.gov)

Dated: October 19, 2020

Respectfully Submitted,



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Cynthia Dahl