



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB - 3 2020

REPLY TO THE ATTENTION OF

VIA ELECTRONIC EMAIL

Mr. Jan Eddy Van Der Kuil
Owner
Well Done Painting Services, LLC
1659 Woodward Avenue
Lakewood, Ohio 44107
ed@welldonepainters.com

Consent Agreement and Final Order – In the Matter of:
Well Done Painting Services, LLC, Docket No. TSCA-05-2020-0003

Dear Mr. Van Der Kuil:

Enclosed please find a copy of a fully executed Consent Agreement and Final Order in resolution of the above case. This document was filed on February 3, 2020 with the Regional Hearing Clerk.

The civil penalty in the amount of \$2,181 is to be paid in the manner described in paragraphs 63 and 64. Please be certain that the docket number is written on both the transmittal letter and on the check.

Thank you for your cooperation in resolving this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Christina Saldivar".

Christina Saldivar
Pesticides and Toxics Compliance Section

Enclosure

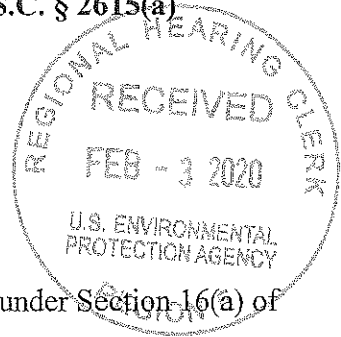
cc: Mary McAuliffe (C-14J)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	Docket No. TSCA-05-2020-0003
)	
Well Done Painting Services, Inc. Lakewood, Ohio)	Proceeding to Assess a Civil Penalty Under Section 16(a) of the Toxic Substances Control Act, 15 U.S.C. § 2615(a)
Respondent.)	
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Consent Agreement and Final Order

Preliminary Statement



1. This is an administrative action commenced and concluded under ~~Section 16(a)~~ of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2615(a), and Sections 22.1(a)(5), 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. Part 22.

2. The Complainant is, by lawful delegation, the Director of the Enforcement and Compliance Assurance Division, U. S. Environmental Protection Agency (EPA), Region 5.

3. Respondent is Well Done Painting Services, LLC, a limited liability corporation with a place of business located at 1659 Woodward Avenue, Lakewood, Ohio 44107.

4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). *See* 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the terms of this CAFO, including the assessment of the

civil penalty specified below.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations set forth in this CAFO.
8. Respondent neither admits nor denies the specific factual allegations and legal conclusions set forth in this CAFO.
9. Respondent 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 its right to request a hearing or petition for judicial review under Section 16(a) of TSCA, 15 U.S.C. § 2615(a), and under 40 C.F.R. § 22.15(c), its right to seek federal judicial review of the CAFO pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-06, any right to contest the allegations in this CAFO, and its right to appeal this CAFO. Respondent also consents to the issuance of this CAFO without further adjudication.

Statutory and Regulatory Background

10. In promulgating the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X), Pub. L. 102-550, 106 Stat. 3897 (codified throughout sections of 15 U.S.C. and 42 U.S.C.), Congress found, among other things, that low-level lead poisoning is widespread among American children, afflicting as many as 3,000,000 children under the age of 6; at low levels, lead poisoning in children causes intelligence deficiencies, reading and learning disabilities, impaired hearing, reduced attention span, hyperactivity, and behavior problems; and the ingestion of household dust containing lead from deteriorating or abraded lead-based paint is

the most common cause of lead poisoning in children. A key component of the national strategy to reduce and eliminate the threat of childhood lead poisoning is to educate the public concerning the hazards and sources of lead-based paint poisoning and steps to reduce and eliminate such hazards.

11. Section 1021 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 amended TSCA, 15 U.S.C. § 2601 *et seq.*, by adding Subchapter IV – Lead Exposure Reduction, 15 U.S.C. §§ 2681 through 2692.

12. Section 402(a) of TSCA, 15 U.S.C. § 2682, required the Administrator of EPA to promulgate regulations to ensure that individuals engaged in lead-based paint activities are properly trained; that training programs are accredited; that contractors engaged in such activities are certified; and that such regulations contain standards for performing lead-based paint activities, taking into account reliability, effectiveness, and safety.

13. Section 402(c) of TSCA, 15 U.S.C. § 2682, required the Administrator of EPA to promulgate guidelines for the conduct of renovation and remodeling activities to reduce the risk of exposure to lead in connection with renovation and remodeling of target housing, public buildings built before 1978, and commercial buildings, and to revise the regulations under Section 402(a) of TSCA to apply those regulations to renovation or remodeling activities in target housing, public buildings constructed before 1978, and commercial buildings that create lead-based paint hazards.

14. Section 406(b) of TSCA, 15 U.S.C. § 2686, required the Administrator of EPA to promulgate regulations to require each person who performs for compensation a renovation of target housing to provide a lead hazard information pamphlet to the owner and occupant of such housing prior to commencing the renovation.

15. Section 407 of TSCA, 15 U.S.C. § 2687, required the regulations promulgated by the Administrator under Subchapter IV to include such recordkeeping and reporting requirements as may be necessary to insure the effective implementation of the TSCA Lead Exposure Reduction requirements, 15 U.S.C. §§ 2681-2692.

16. TSCA Section 11, 15 U.S.C. § 2610, provides EPA with authority to conduct inspections upon the presentation of appropriate credentials and a written notice.

17. Under Section 409 of TSCA, 15 U.S.C. § 2689, it shall be unlawful for any person to fail or refuse to comply with any rule or order issued under Subchapter IV – Lead Exposure Reduction, 15 U.S.C. §§ 2681 through 2692. *See also* 40 C.F.R. § 754.87.

18. Under Section 15 of TSCA, 15 U.S.C. § 2614, it shall be unlawful for any person to fail or refuse to establish and maintain records, submit reports, notices, or other information, or permit access to or copying of records, as required by TSCA or a rule thereunder. *See also* 40 C.F.R. § 745.87.

19. Under Sections 402, 404, 406 and 407 of TSCA, 15 U.S.C. §§ 2682, 2684, 2686 and 2687, EPA promulgated regulations amending 40 C.F.R. Part 745, Subparts E and L, Residential Property Renovation and Lead-Based Paint Activities, to prescribe procedures and requirements for the accreditation of training programs, certification of individuals and firms engaged in lead-based paint activities, and work practice standards for renovation, repair, and painting activities in target housing and child-occupied facilities. *See* 73 Fed. Reg. 21691 (April 22, 2008).

20. 40 C.F.R. § 745.83 defines *firm* to mean a company, partnership, corporation, sole proprietorship or individual doing business, association, or other business entity; a Federal, State, Tribal, or local government agency; or a nonprofit organization.

21. 40 C.F.R. § 745.83 defines *pamphlet* to mean the EPA pamphlet titled Renovate

Right: Important Lead Hazard Information for Families, Child Care Providers and Schools developed under Section 406(a) of TSCA for use in complying with Section 406(b) of TSCA, or any State or Tribal pamphlet approved by EPA pursuant to 40 C.F.R. § 745.326 that is developed for the same purpose. This includes reproductions of the pamphlet when copied in full and without revisions or deletion of material from the pamphlet (except for the addition or revision of State or local sources of information).

22. 40 C.F.R. § 745.83 defines *renovation* to mean the modification of any existing structure, or portion thereof, that results in the disturbance of painted surfaces, unless that activity is performed as part of an abatement as defined by this part (40 C.F.R. § 745.223). The term renovation includes (but is not limited to): the removal, modification or repair of painted surfaces or painted components; the removal of building components; weatherization projects; and interim controls that disturb painted surfaces.

23. 40 C.F.R. § 745.83 defines *renovator* to mean an individual who either performs or directs workers who perform renovations. A certified renovator is a renovator who has successfully completed a renovator course accredited by EPA or an EPA authorized State or Tribal Program.

24. 40 C.F.R. § 745.103 defines *target housing* to mean any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than six (6) years of age resides or is expected to reside in such housing) or any zero-bedroom dwelling.

25. 40 C.F.R. Part 745, Subpart E, Residential Property Renovation, applies to all renovations performed for compensation in target housing and child-occupied facilities, with exceptions not relevant here. 40 C.F.R. § 745.82.

26. 40 C.F.R. § 745.84(a)(1) requires that the firm performing the renovation in target housing must provide the owner with the pamphlet no more than 60 days before beginning renovation activities, and obtain from the owner a written acknowledgement that the owner has received the pamphlet or obtain a certification of mailing at least 7 days prior to the renovation.

27. 40 C.F.R. § 745.85(a) requires that renovations must be performed by certified firms, in accordance with 40 C.F.R. § 745.89, using certified renovators in accordance with 40 C.F.R. § 745.90.

28. 40 C.F.R. § 745.86(a) requires firms performing renovations to retain and, if requested, make available to EPA all records necessary to demonstrate compliance with 40 C.F.R. Part 745, Subpart E for a period of three years following completion of the renovation.

29. 40 C.F.R. § 745.86(b)(6) requires firms to retain records that document compliance with the work practice standards in 40 C.F.R. § 745.85, including documentation that a certified renovator was assigned to the project, that the certified renovator provided on-the-job training for workers used on the project, that the certified renovator performed or directed workers who performed all of the tasks described in § 745.85(a), and that the certified renovator performed the post-renovation cleaning verification described in § 745.85(b).

30. 40 C.F.R. § 745.87(b) requires firms performing renovations to establish and maintain records and make them available or permit access to or copying of records.

31. 40 C.F.R. § 745.81(a)(2)(ii) requires that on or after April 22, 2010, no firm may perform, offer, or claim to perform renovations without certification from EPA under 40 C.F.R. § 745.89 in target housing or child occupied facilities, unless the renovation qualifies for one of the exceptions identified in 40 C.F.R. § 745.82(a).

32. 40 C.F.R. §§ 745.89(b)(1)(iii) and 745.89(a)(2)(ii) require firms that perform, offer, or claim to perform renovations for compensation to maintain its certification, and to stop performing renovations at target housing or child-occupied facilities if it fails to obtain recertification before the firm's current certification expires.

33. Under 15 U.S.C. § 2689 and 40 C.F.R. § 745.87(a), failing to comply with any requirement of 40 C.F.R. Part 745, Subpart E, violates Section 409 of TSCA, 15 U.S.C. § 2689, which may subject the violator to administrative penalties under Section 16(a) of TSCA, 15 U.S.C. § 2615(a) and 40 C.F.R. § 745.87(d).

34. Section 16(a) of TSCA, 42 U.S.C. § 2615(a), 40 C.F.R. § 745.87(d), and 40 C.F.R. Part 19, authorize the Administrator of EPA to assess a civil penalty of up to \$38,892 per violation for each day of violation of Sections 15 and 409 of TSCA that occurred after November 2, 2015.

General Allegations

35. Complainant incorporates paragraphs 1 through 34 of this CAFO as if set forth in this paragraph.

36. At all times relevant to this CAFO, Respondent's corporation was a firm as defined by 40 C.F.R. § 745.83.

37. On July 25, 2018, Mr. Jan Eddy van der Kuil of Respondent's firm performed a renovation, or directed workers to perform a renovation for compensation at the property located in Lakewood, Ohio, described in Line 1 in the Table below referenced in paragraph 43 (Lakewood Property).

38. On July 25, 2018, the EPA representative received verbal consent to access the

Lakewood Property from the property owner to conduct an inspection.

39. On July 25, 2018, Mr. Jan Eddy van der Kuil signed the written notice of inspection acknowledging that the EPA representative was to conduct an inspection to monitor Respondent's compliance at the Lakewood Property.

40. On July 25, 2018, Complainant conducted an inspection of Respondent to monitor Respondent's compliance with Sections 402 and 406 of TSCA.

41. On February 27, 2019, Complainant issued a request for information to Respondent, seeking, among other things, a copy of the renovator certification showing completion of an EPA accredited training course, a copy of the firm certification received by EPA, copies of all contracts and/or agreements for renovation (contracts) and copies of all acknowledgements of receipt of a pamphlet by the owners and occupants of residential housing.

42. On April 17, 2019, Respondent provided Complainant with documents responsive to the Request for Information referenced in paragraph 41.

43. Based on the information provided to Complainant by Respondent, as well as building-year information publicly available on the property value assessment website (accessed on February 26, 2019) of Cuyahoga County (myplace.cuyahogacounty.us), Respondent performed, or directed workers to perform for compensation, the following modifications of existing structures that resulted in disturbances of painted surfaces in the following residential housing built prior to 1978, referenced in this Table:

Line No.	Residential Property Address	Residence Type	Built Year	Work Start Date	Contracted Work
1	1651 Woodward Avenue, Lakewood, Ohio 44107	Single-Family	1918	8/1/2018	Exterior Renovation
2	134 Kensington Oval, Rocky River, Ohio 44116	Single-Family	1937	8/6/2018	Exterior Renovation

3	1244 Cranford Avenue, Lakewood, Ohio 44107	Single-Family	1910	6/4/2018	Interior Renovation
4	1511 W Clifton Boulevard, Lakewood, Ohio 44107	Single-Family	1912	9/7/2018	Exterior Renovation
5	1568 Grace Avenue, Lakewood, Ohio 44107	Single-Family	1897	10/12/2018	Exterior Renovation
6	1568 Grace Avenue, Lakewood, Ohio 44107	Single-Family	1897	12/27/2018	Interior Renovation
7	1085 Leedale Avenue, Lakewood, Ohio 44114	Single-Family	1920	7/1/2018	Exterior Renovation
8	1215 Manor Park Avenue, Lakewood, Ohio 44107	Single-Family	1914	6/25/2018	Exterior Renovation
9	2100 Reveley Avenue, Lakewood, Ohio 44107	Single-Family	1923	11/15/2018	Interior Renovation
10	783 Brayton Avenue, Cleveland, Ohio 44113	Single-Family	1900	10/9/2018	Exterior Renovation
11	1087 Leedale Avenue, Lakewood, Ohio 44107	Single-Family	1919	7/6/2018	Exterior Renovation
12	13980 Lake Avenue, Lakewood, Ohio 44107	Single-Family	1924	6/30/2018	Exterior Renovation
13	13926 Clifton Boulevard, Lakewood, Ohio 44107	Single-Family	1908	12/17/2018	Interior Renovation
14	1618 Woodward Avenue, Lakewood, Ohio 44107	Single-Family	1912	8/9/2018	Interior Renovation
15	3841 W Valley Drive, Fairview Park, Ohio 44126	Single-Family	1965	12/17/2018	Interior Renovation
16	1623 Woodward Avenue, Lakewood, Ohio 44107	Single-Family	1919	9/24/2018	Exterior Renovation

44. At the 16 renovations referenced in paragraph 43, Respondent performed or directed to perform modifications of the buildings' existing structures that resulted in disturbance of painted surfaces, and were therefore renovations as defined in 40 C.F.R. § 745.83.

45. The 16 renovations referenced in paragraph 43 were each performed at residential housing built prior to 1978, and therefore the residential housing was target housing as defined in 40 C.F.R. § 745.103.

Count 1 – Failure to Maintain EPA Firm Certification

46. Complainant incorporates paragraphs 1 through 45 of this CAFO as if set forth in this paragraph.

47. 40 C.F.R. § 745.89(b)(1)(iii) requires firms that perform, offer, or claim to perform renovations for compensation to maintain its certification, and to stop performing renovations at target housing or child-occupied facilities if it fails to obtain recertification before the firm's current certification expires.

48. Respondent did not maintain its firm certification at the time of the 16 renovations referred in paragraph 43 and did not qualify for an exemption under 40 C.F.R. § 745.82(b).

49. Respondent's failure to maintain its firm certification before performing the 16 renovations referred to in paragraph 43, constitutes a violation under 40 C.F.R.

§ 745.89(b)(1)(iii) and 40 C.F.R. § 745.81(a)(2)(ii) and 15 U.S.C. § 2689.

Count 2 – Failure to Establish and Maintain Records or Make Records Available

50. Complainant incorporates paragraphs 1 through 45 of this CAFO as if set forth in this paragraph.

51. In all 16 contracted renovations described in paragraph 43, Respondent failed to establish and maintain:

- a. Documentation of compliance with the work practice standards in 40 C.F.R. § 745.85,
- b. Documentation that a certified renovator was assigned to the project,
- c. Documentation that the certified renovator provided on-the-job training for workers used on the project,

- d. Documentation that the certified renovator performed or directed workers who performed all of the tasks described in 40 C.F.R. § 745.85(a), and
- e. Documentation that the certified renovator performed the post-renovation cleaning verification described in 40 C.F.R. § 745.85(b).

52. Respondent's failure to establish and maintain all records necessary to demonstrate compliance with 40 C.F.R. Part 745, Subpart E for a period of three years following the completion of all contracted renovations described in paragraph 43 constitutes a violation of 40 C.F.R. § 745.86(b)(6), 40 C.F.R. § 745.87(a), and 15 U.S.C. § 2689.

Counts 3 to 18– Failure to Provide the Pamphlet to 16 Owners of Single-Family Dwellings

53. Complainant incorporates paragraphs 1 through 45 of this CAFO as if set forth in this paragraph.

54. Respondent performed renovations in 16 locations of single-family target housing, described in paragraph 43, and failed to obtain from each owner the written acknowledgments that each owner had received the pamphlet, or obtain for each location a certificate of mailing at least seven days prior to the renovations.

55. Respondent's failure to obtain from each owner of the 16 locations of the single-family target housing, as described in paragraph 43, the written acknowledgement that each owner had received the pamphlet, or obtain a certificate of mailing at least seven days prior to the renovations, constitutes 16 violations of 40 C.F.R. § 745.84(a)(1), 40 C.F.R. § 745.87(a), and 15 U.S.C. § 2689.

Count 19 – Failure to Ensure that all Individuals Working on Behalf of the Firm are either Certified Renovators or Trained by a Certified Renovator

56. Complainant incorporates paragraphs 1 through 45 of this CAFO as if set forth in this paragraph.

57. Respondent performed renovations in 16 locations of single-family target housing, described in paragraph 43, and failed to ensure that all individuals working on behalf of the firm were either certified renovators or have been trained by a certified renovator in accordance with 40 C.F.R. § 745.90.

58. Respondent's failure to ensure that all individuals working on behalf of the firm were either certified renovators or have been trained by a certified renovator in accordance with 40 C.F.R. § 745.90, constitutes a violation of 40 C.F.R. § 745.89(d)(1), 40 C.F.R. § 745.87(a), and 15 U.S.C. § 2689.

Count 20 – Failure to Ensure a Certified Renovator is Assigned to Each Renovation

59. Complainant incorporates paragraphs 1 through 45 of this CAFO as if set forth in this paragraph.

60. Respondent performed renovations in 16 locations of single-family target housing, described in paragraph 43, and failed to ensure that a certified renovator was assigned to each renovation performed by the firm and discharges all of the certified renovator's responsibilities under 40 C.F.R. § 745.90.

61. Respondent's failure to ensure that a certified renovator was assigned to each renovation performed by the firm and discharges all of the certified renovator's responsibilities

under 40 C.F.R. § 745.90, constitutes a violation of 40 C.F.R. § 745.89(d)(2), 40 C.F.R. § 745.87(a), and 15 U.S.C. § 2689.

Civil Penalty

62. Pursuant to Section 16(a) of TSCA, 15 U.S.C. § 2615(a), Complainant determined that an appropriate civil penalty to settle this action was \$2,181. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violations alleged and, with respect to the violator, ability to pay, effect on ability to continue to do business, any history of prior such violations, the degree of culpability, and such other factors as justice may require. Complainant also considered EPA's *Interim Final Consolidated Enforcement Response and Penalty Policy for the Pre-Renovation Education Rule; Renovation, Repair and Painting Rule; and Lead-Based Paint Activities Rule*, dated August 19, 2010, and the applicable EPA pilot *Lead-Based Paint Graduated Penalty Approach* issued on March 5, 2017.

63. Within 30 days after the effective date of this CAFO, Respondent must pay the \$2,181 civil penalty for the TSCA violations sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

The check must state the case title ("In the Matter of: Well Done Painting Services, LLC"), and the docket number of this CAFO.

64. Respondent must send a notice of payment that states Respondent's name, complete address, and the case docket number to EPA at the following addresses when it pays the penalty:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Christina Saldivar (ECP-17J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Mary McAuliffe (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

65. This civil penalty is not deductible for federal tax purposes.

66. If Respondent does not timely pay the civil penalty by the deadline, EPA may refer this matter to the Attorney General, who will recover such amount, plus interest, in the appropriate district court of the United States under Section 16(a) of TSCA, 15 U.S.C. § 2615(a). Respondent acknowledges that the validity, amount, and appropriateness of the civil penalty are not reviewable in a collection action.

67. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following interest, fees, and penalties on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 31 U.S.C. § 3717. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

68. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: mcauliffe.mary@epa.gov (for Complainant), and ed@welldonepainters.com (for Respondent).

69. Respondent's full compliance with this CAFO shall only resolve Respondent's liability for federal civil penalties for the violations alleged in the CAFO.

70. This CAFO does not affect the rights of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

71. This CAFO does not affect Respondent's responsibility to comply with TSCA, the Residential Lead-Based Paint Hazard Reduction Act of 1992, the Lead Residential Lead-Based Paint Disclosure Program, and other applicable federal, state, or local laws and permits.

72. Respondent certifies that it is complying with TSCA and 40 C.F.R. Part 745.

73. The terms of this CAFO bind Respondent and its successors and assigns.

74. Each person signing this CAFO certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

75. Each party agrees to bear its own costs and attorney's fees in this action.

76. This CAFO constitutes the entire agreement between the parties.

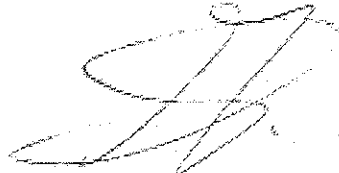
77. The effective date of this CAFO is the date on which it is filed with the Regional Hearing Clerk.

Consent Agreement and Final Order
In the Matter of: Well Done Painting Services, LLC
Docket No. TSCA-05-2020-0003

Well Done Painting Services, LLC

12/28/19

Date



Jan Eddy Van Der Kuil

Owner

Well Done Painting Services, LLC

Consent Agreement and Final Order
In the Matter of: Well Done Painting Services, LLC
Docket No. TSCA-05-2020-0003

United States Environmental Protection Agency, Complainant

1-29-20
Date

Sara Brunema

Michael D. Harris
Director
Enforcement and Compliance Assurance Division

Consent Agreement and Final Order
In the Matter of: Well Done Painting Services, LLC
Docket No. TSCA-05-2020-0003

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.

1/29/2020
Date

Ann L. Coyle
Ann L. Coyle
Regional Judicial Officer
United States Environmental Protection Agency
Region 5

Consent Agreement and Final Order
In the Matter of: Well Done Painting Services, LLC
Docket Number: TSCA-05-2020-0003

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, which was filed on TSCA-05-2020-0003, this day in the following manner to the addressees:

Copy by e-mail to
Respondent:

Mr. Jan Eddy Van Der Kuil
Well Done Painting Services, LLC
ed@welldonepainting.com

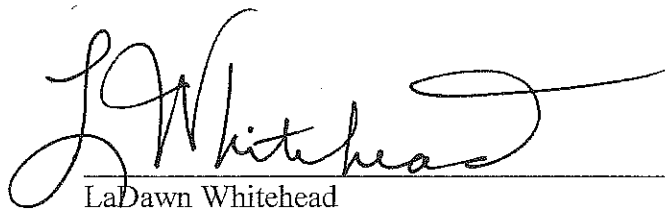
Copy by e-mail to
Attorney of Complainant:

Mary McAuliffe
mcauliffe.mary@epa.gov

Copy by e-mail to
Regional Judicial Officer:

Ann Coyle
coyle.ann@epa.gov

Dated: February 3, 2020



LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5