



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

June 8, 2022

REPLY TO THE ATTENTION OF

**VIA ELECTRONIC MAIL**

Mr. Adam Weinrub  
President  
Vytex Corporation  
9425 Washington Boulevard North  
Laurel, MD 20723

adamweinrub@vytexwindows.com

Consent Agreement and Final Order – In the Matter of:  
Vytex Corporation, LLC Docket No. TSCA-05-2022-0006

Dear Mr. Weinrub:

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 June 8, 2022 with the Regional Hearing Clerk.

The civil penalty in the amount of \$112,346 is to be paid in the manner described in paragraphs 57 and 58. 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,

EMMA  
AVANT

Digitally signed by EMMA  
AVANT  
Date: 2022.05.31  
14:47:53 -05'00'

Emma Avant  
Pesticides and Toxics Compliance Section

Enclosure

cc: Jeffrey Cahn (C-14J)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

<b>In the Matter of:</b>	)	<b>Docket No. TSCA-05-2022-0006</b>
	)	
<b>Vytex Corporation</b>	)	<b>Proceeding to Assess a Civil</b>
<b>Twinsburg, Ohio</b>	)	<b>Penalty Under Section 16(a) of the</b>
	)	<b>Toxic Substances Control Act,</b>
<b>Respondent.</b>	)	<b>15 U.S.C. § 2615(a)</b>
<hr/>	)	

**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 Vytex Corporation, with a place of business formerly located at 9079 Dutton Drive, Twinsburg, Ohio 44087, and with a principal place of business located at 9425 Washington Boulevard North, Laurel, MD 20723.

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). 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, Pub. L. No. 102-550, Oct. 28, 1998 (Title X), Congress found, among other things, that low-level lead poisoning was widespread among American children, afflicting as many as 3,000,000 children under age six (6); at low levels, lead poisoning in children causes intelligence quotient 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. *See* 42 U.S.C. § 4851.

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, requires 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, requires the Administrator of EPA to promulgate guidelines for the conduct of Renovation, Repair and Painting (RRP) activities to reduce the risk of exposure to lead in connection with renovation and remodeling of target housing and 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(b), requires the Administrator of EPA to promulgate regulations to require each person who performs for compensation 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, requires the regulations promulgated by the Administrator of EPA 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 through 2692.

16. Section 11 of TSCA, 15 U.S.C. § 2610, provides EPA with authority to conduct inspections upon the presentation of appropriate credentials and 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. § 745.87.

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. Pursuant to Sections 402, 406, and 407 of TSCA, 15 U.S.C. §§ 2682, 2686, and 2687, EPA promulgated the residential property renovation regulations at 40 C.F.R. Part 745, Subpart E, prescribing procedures and requirements for: the accreditation of renovator training programs; certification of individuals and firms engaged in lead-based paint activities; work practice standards for renovation, repair and painting activities in target housing and child-occupied facilities; and recordkeeping to demonstrate compliance with work practice standards. *73 Fed. Reg.* 21691 (April 22, 2008).

20. 40 C.F.R. § 745.82(a) provides that Subpart E applies to all renovations performed in target housing and child-occupied facilities, with certain exceptions not relevant here.

21. 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.

22. 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).

23. 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.

24. 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.

25. 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.

26. 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.

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 a firm 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. § 745.84(a)(1) requires firms to provide the owner of the unit with the EPA-approved lead hazard information pamphlet no more than 60 days before beginning renovation activities in any residential dwelling unit of target housing.

31. 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.

32. 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).

33. Under 15 U.S.C. § 1689 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, 15 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 \$41,056 per violation for each day of violation of Sections 15 and 409 of TSCA that occurred after November 2, 2015, where penalties are assessed on or after December 23, 2020.

#### **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 was a firm as defined by 40 C.F.R. § 745.83.

37. On December 17, 2019, EPA conducted an on-site inspection at Respondent's place of business located at 9079 Dutton Drive, Twinsburg, Ohio regarding Respondent's compliance with the residential property renovation requirements at 40 C.F.R. Part 745, Subpart E.

38. During the December 17, 2019, on-site inspection, representatives of EPA conducted a recordkeeping inspection of Vytex Corporation to monitor compliance with TSCA Sections 402, 406, 407 and its implementing regulations at 40 C.F.R. Part 745, Subpart E. This record keeping inspection consisted of a review of 54 renovation project contracts provided by the Respondent.



39. On November 5, 2020, Complainant issued a request for information to Respondent for additional information regarding fifteen of the 54 renovation project contracts reviewed by EPA, including, among other things, a copy of the certification of the employee designated as the Firm’s Renovator showing completion of an EPA accredited training course, a copy of the firm’s EPA RRP certification, copies of all contracts and/or agreements for renovation (contracts) for the fifteen properties, and copies of all acknowledgements of receipt of a pamphlet by the owners and occupants of the residential housing and renovation records maintained as required by the Lead Renovation, Repair and Painting Rule (RRP).

40. On February 5, 2021, and March 31, 2021, Respondent provided Complainant documents via electronic mail responsive to the request for information referenced in paragraph 39.

41. Based on information provided to Complainant by Respondent, the Respondent 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, as detailed in this Table:

<b>Line No.</b>	<b>Residential Property Project Number<sup>1</sup></b>	<b>Residence Type</b>	<b>Built Year</b>	<b>Renovation Date</b>	<b>Contracted Work</b>
1	PRJ100990	Single-Family	1953	2/1/2018	Window Replacement
2	PRJ162105	Single-Family	1949	6/7/2018	Window Replacement
3	PRJ126144	Single-Family	1953	11/19/2018	Window Replacement
4	PRJ 136511	Single-Family	1920	4/2/2019	Window Replacement
5	PRJ140942	Single-Family	1900	5/16/2019	Window Replacement

---

1 A residential property contract project number is being used in lieu of a property address. The property address associated with each residential property contract project number is on file at EPA's Region 5 office.

6	PRJ143388	Single-Family	1940	6/24/2019	Window Replacement
7	PRJ153826	Single-Family	1920	7/24/2019	Window Replacement
8	PRJ156128	Single-Family	1955	9/12/2019	Window Replacement
9	PRJ156688	Single-Family	1957	9/14/2019	Window Replacement
10	PRJ146650	Single-Family	1969	9/16/2019	Window Replacement
11	PRJ159543	Single-Family	1950	10/22/2019	Window Replacement
12	PRJ163339	Single-Family	1958	11/22/2019	Window Replacement

42. Of the twelve (12) contracted renovations referenced in paragraph 41, 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.

43. The twelve (12) renovations referenced in paragraph 41 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.

**Counts 1 to 4 – Failure to Retain All Records Necessary to Demonstrate Compliance with**

**40 C.F.R. Part 745, Subpart E**

44. Complainant incorporates paragraphs 1 through 43 of this Complaint as if set forth in this paragraph.

45. 40 C.F.R. § 745.86(b)(1) requires a firm to retain the following records:

- a. Records or reports certifying that a determination had been made that lead-based paint was not present on the components affected by the renovation;

- b. Records prepared by a certified renovator after using EPA-recognized test kits, including an identification of the manufacturer and model of any test kits used, a description of the components that were tested including their locations, and the result of each test kit used.
46. 40 C.F.R. § 745.86(b)(6) requires a firm to retain the following records:
- 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).

47. Respondent performed contracted renovations at four locations of single-family residential housing as described in paragraph 41 of the Table at Line Numbers 7 to 9 and 11 and failed 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 completion of each renovation.

48. Respondent's alleged 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 each of the four contracted renovations described in paragraph 47 constitutes four violations of 40 C.F.R. § 745.86(b)(6), 40 C.F.R. § 745.87(a), and 15 U.S.C. § 2689.

**Counts 5 to 12– Failure to Obtain Written Acknowledgement from Owners**

49. Complainant incorporates paragraphs 1 through 43 of this Complaint as if set forth in this paragraph.

50. Respondent performed contracted renovations at eight locations of single-family residential housing as described in paragraph 41 of the Table at Line Numbers 1 to 6, 10, and 12 and obtained from each owner the written acknowledgement that the owners had received the pamphlet at the time of contract execution, but not within sixty days prior to the commencement of renovation activities.

51. Respondent's failure to provide the owners of the eight dwelling units described in paragraph 50 with the EPA-approved lead hazard informational pamphlet no more than 60 days before the beginning renovation activities constitutes eight violations of 40 C.F.R. § 745.84(a)(1) and 15 U.S.C. § 2689.

**Count 13 to 16– Failure to Assign a Certified Renovator to the Renovation Projects**

52. Complainant incorporates paragraphs 1 through 43 of this Complaint as if set forth in this paragraph.

53. 40 C.F.R. § 745.89(d)(1) requires the firm performing the renovation to ensure that all individuals performing renovation activities on behalf of the firm are either certified renovators or have been trained by a certified renovator in accordance with 40 C.F.R. § 745.90.

54. Respondent performed or directed to perform renovations as described in paragraph 41 of the Table at Line Numbers 7 to 9 and 11 and did not assign a certified renovator to the renovations.

55. Respondent's alleged failure to ensure that a certified renovator was assigned to each of the four renovations described in paragraph 54 constitutes four violations of 40 C.F.R. § 745.89(d)(1), 40 C.F.R. § 745.87(a), and 15 U.S.C. § 2689.

### Civil Penalty

56. Pursuant to Section 16(a) of TSCA, 15 U.S.C. § 2615(a), Complainant determined that an appropriate civil penalty to settle this action is \$112,346.00. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violations alleged and, with respect to Respondent, 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.

57. Within 30 days after the effective date of this CAFO, Respondent must pay the civil \$112,346.00 penalty for the TSCA violations by 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 Respondent's name and the docket number of this CAFO.

58. Respondent must send a notice of payment that states Respondent's name 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

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

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

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

60. If Respondent does not timely pay the civil penalty, 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.

61. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following 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**

62. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: [cahn.jeff@epa.gov](mailto:cahn.jeff@epa.gov) (for Complainant), and [mhwang@MilesStockbridge.com](mailto:mhwang@MilesStockbridge.com) and [adamweinrub@vytexwindows.com](mailto:adamweinrub@vytexwindows.com) (for Respondent). Respondent understands that the CAFO will become publicly available upon filing.

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

64. 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.

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

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

67. This CAFO constitutes a "prior such violation" as that term is used in 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 to determine Respondent's "history of prior such violations" under Section 16(a)(2)(B) of TSCA, 15 U.S.C. § 2615(a)(2)(B).

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

69. Each person signing this agreement 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.

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

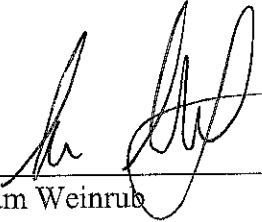
71. This CAFO constitutes the entire agreement between the parties.

72. 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: Vytex Corporation  
Docket No. TSCA-05-2022-0006**

**Vytex Corporation Respondent**

5/27/2022  
Date

  
\_\_\_\_\_  
Mr. Adam Weinrub  
President  
Vytex Corporation  
9425 Washington Boulevard North  
Laurel, MD 20723.

[adamweinrub@vytexwindows.com](mailto:adamweinrub@vytexwindows.com)



**Consent Agreement and Final Order  
In the Matter of: Vytex Corporation  
Docket No. TSCA-05-2022-0006**

**United States Environmental Protection Agency, Complainant**

**MICHAEL  
HARRIS**

Digitally signed by MICHAEL  
HARRIS  
Date: 2022.06.07 12:42:07  
-05'00'

---

Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance Division

**Consent Agreement and Final Order  
In the Matter of: Vytex Corporation  
Docket No. TSCA-05-2022-0006**

**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.

**ANN COYLE** Digitally signed by ANN  
COYLE  
Date: 2022.06.08 11:18:32  
-05'00'

---

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

**Consent Agreement and Final Order**  
**In the Matter of: Vytex Corporation**  
**Docket Number: TSCA-05-2022-0006**

**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 June 8, 2022, this day in the following manner to the addressees:

Copy by e-mail to  
Respondent:

Mr. Adam Weinrub  
President  
Vytex Corporation  
9425 Washington Boulevard North  
Laurel, MD 20723  
[adamweinrub@vytexwindow.com](mailto:adamweinrub@vytexwindow.com)

Copy by e-mail to  
Attorney for Respondent:

Marian Hwang  
[mhwang@MilesStockbridge.com](mailto:mhwang@MilesStockbridge.com)

Copy by e-mail to  
Attorney for Complainant:

Jeffrey Cahn  
[cahn.jeff@epa.gov](mailto:cahn.jeff@epa.gov)

Copy by e-mail to  
Regional Judicial Officer:

Ann Coyle  
[coyle.ann@epa.gov](mailto:coyle.ann@epa.gov)

---

Isidra Martinez  
Acting Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 5