



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

- 4 AUG 2008

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EPA--REGION 10

Reply To: OCE-084

Mr. John York  
215 N.E. 40<sup>th</sup> Street  
Suite C-3  
Seattle, Washington 98105

Re: In re Eliot Lieberman, Beatriz Shanahan and Argent Chemical Laboratories, Inc.,  
EPA Docket No. FIFRA -10-2004-0073

Dear Mr. York:

I have reviewed the letter you submitted to Juliane Matthews, EPA Region 10 Assistant Regional Counsel, regarding the penalty payment schedule in the above entitled matter. Pursuant to my January 15, 2008, letter to Ms. Shanahan extending the original payment schedule, a penalty payment of \$69,159.70 was due on or before August 1, 2008, and the remaining \$81,200 penalty was due by December 31, 2008. For the reasons you discussed with Ms. Matthews and explained in your letter, the Respondents, Argent Chemical Laboratories, Eliot Lieberman and Beatriz Shanahan, request a revised penalty payment schedule. You suggested that a penalty in the amount of \$16,000 be made every three months until the penalty is paid in full. Accordingly, the following revised penalty payment is acceptable.

|                     |                    |   |
|---------------------|--------------------|---|
| August 10, 2008     | \$14,823.79        | (to include Mr. Lieberman's overdue \$5,000 personal penalty payment) |
| Nov 10, 2008        | \$14,823.79        |   |
| <b>Feb 10, 2009</b> | <b>\$14,823.79</b> |   |
| May 10, 2009        | \$14,823.79        |   |
| Aug 10, 2009        | \$14,823.79        |   |
| Nov 10, 2008        | \$14,823.79        |   |
| <b>Feb 10, 2010</b> | <b>\$14,823.79</b> |   |
| May 10, 2010        | \$14,823.79        |   |
| Aug 10, 2010        | \$14,823.79        |   |
| Nov 10, 2010        | \$14,823.79        |   |
| Feb 10, 2011        | \$14,823.79        |   |
| May 10, 2011        | \$14,823.79        |   |
| Aug 10, 2011        | \$14,823.79        |   |

Additionally, the first payments in 2009 and 2010 (**bolded above**) should include the personal penalty payments from Mr. Lieberman and Ms. Shanahan of \$5,000 each.

Approval of this extension does not change any of the other payment terms or conditions of the CAFO. Please call Juliane Matthews at (206) 553-1169 if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Bussell". The signature is fluid and cursive, with a prominent loop at the end.

Michael A. Bussell, Director  
Office of Compliance and Enforcement

cc: Larry Finegold, The Finegold Law Firm  
Beatriz Shanahan, Argent Chemical Laboratories