



Dated by electronic signature

VIA EMAIL

LeAnn Jensen
Regional Judicial Officer
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100 (Mail Code 4-MI)
Boston, MA 02109-3912
Jensen.LeAnn@epa.gov

Re: In the Matter of Professional Contract Sterilization, Inc.
Docket No: EPCRA-01-2025-0013

Dear Ms. Jensen:

Attached for your review and signature is a Consent Agreement and Final Order ("CAFO") that will resolve an Emergency Planning and Community Right to-Know Act ("EPCRA") administrative penalty action brought by the U.S. Environmental Protection Agency, Region 1 ("EPA") against Professional Contract Sterilization, Inc. ("PCS") for alleged failures to timely submit Toxic Release Inventory ("TRI") reports in violation of EPCRA Section 313.

The Consent Agreement has been signed by the parties and is now presented for the Regional Judicial Officer's signature of the Final Order.

As permitted by 40 C.F.R. §§ 22.13(b) and 22.18(b)(2), the CAFO will both commence and conclude EPA's enforcement action against PCS. The CAFO describes PCS's alleged EPCRA violations related to late TRI report submissions for its commercial sterilization facility in Taunton, Massachusetts. The CAFO also includes a certification that PCS has corrected its violations and will operate its facility in compliance with EPCRA Section 313.

Under the CAFO, PCS will pay a settlement penalty of \$21,021 within 30 days of the date this CAFO becomes final. The penalty is consistent with EPA's *Enforcement Response Policy for Section 313 of the Emergency Planning and Community Right-to-Know Act (1986) and Section 6607 of the Pollution Prevention Act (1990) (February 2017)*.

The parties' consent to the use of digital signatures and Respondent's consent to electronic service are included in the CAFO. The parties' service email addresses are included in the CAFO and the Proposed Certificate of Service transmitted to the Regional Hearing Clerk.

If you have any questions regarding the proposed CAFO, please contact me at lee.jaegun@epa.gov or 617-918-1511, and Respondent's counsel James Marsh at jmarsh@jwmarshlaw.com or (508) 991-5000.

Sincerely,

Jaegun Lee
Attorney-Advisor
EPA Region 1

cc : James Marsh, Counsel for Respondent
Wanda Santiago, Regional Hearing Clerk