



REGION 1
BOSTON, MA 02109

June 2, 2025

FILED

6/2/25

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**U.S. EPA REGION 1
HEARING CLERK**

By email

Ms. LeAnn Jensen
Regional Judicial Officer
U.S. EPA, Region 1 (Mail Code 4-MI)
5 Post Office Square, Suite 100
Boston, Massachusetts 02109
Jensen.LeAnn@epa.gov

Re: *In the Matter of Bostik, Inc.*, Docket No. RCRA-01-2025-0017

Dear Ms. Jensen:

In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2), and simultaneously transmitted with this letter, please find a Consent Agreement and proposed Final Order (“CAFO”) settling the above-referenced action. The Consent Agreement has been signed by the parties and is now being submitted to you for approval.

If signed by you, the CAFO will resolve administrative civil penalty liability of the Respondent, Bostik, Inc., for alleged violations of the Resource Conservation and Recovery Act (“RCRA”), 42 U.S.C. §§ 6901–6987, and regulations promulgated or authorized pursuant to RCRA, at Bostik’s adhesive and sealing product manufacturing facility in Middleton, Massachusetts.

The proposed CAFO requires Respondent to pay a penalty of \$122,589, applying the factors set forth in 42 U.S.C. § 6928 and EPA’s *RCRA Civil Penalty Policy* (June 2003). The CAFO also requires Respondent to certify compliance with RCRA and the federal and state hazardous waste regulations promulgated thereunder.

The parties’ consent to the use of digital signatures (as well as Respondent’s consent to electronic service of the CAFO, once filed) is included in the CAFO. Respondent chose to use a “wet” signature, and EPA’s official signed electronically. Accordingly, I am submitting a PDF of the executed CAFO and will file Respondent’s original signature page with the Regional Hearing Clerk when I receive it by mail from Respondent. This settlement does not have any public notice requirements.

Thank you for your attention to this matter.

Respectfully submitted,

Laura J. Berry
Senior Enforcement Counsel

cc: Paul Caizzi, Bostik, Inc.
James W. Beers, Jr., Troutman Pepper Locke LLP