



REGION 1
BOSTON, MA 02109

July 15, 2025

FILED

7/16/25

2:45 PM

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

By email

Mr. Michael J. Knapp
Regional Judicial Officer
U.S. EPA, Region 1 (Mail Code 4-MD)
5 Post Office Square, Suite 100
Boston, Massachusetts 02109
Knapp.Michael@epa.gov

Re: *In the Matter of Houghton Chemical Company*, Docket No. EPCRA-01-2025-0007

Dear Mr. Knapp:

In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2), and simultaneously transmitted with this letter, please find attached 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 your review and approval.

If signed by you, the CAFO will resolve Respondent, Houghton Chemical Corporation, of administrative civil penalty liability for six alleged violations of Section 313 of the Emergency Planning and Community Right to Know Act (“EPCRA”), 42 U.S.C. § 11023.

Under the terms of the CAFO, the Respondent has agreed to pay a civil monetary penalty of \$64,327 within 30 days of the CAFO’s effective date. The penalty complies with EPCRA statutory penalty assessment factors and with EPA’s penalty policy for EPCRA Section 313 cases. The settlement also requires the Respondent to certify compliance with EPCRA Section 313 and complete within one year of the CAFO’s effective date a supplemental environmental project (“SEP”) that complies with EPA’s 2015 SEP policy. This settlement does not have a public notice requirement.

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 signed with 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 you after I receive it in the mail.

Kristen Scherb is the lead attorney on this matter. I am filing the CAFO in her absence through July 18. If you have any questions regarding the proposed CAFO, please contact her at scherb.kristen@epa.gov or (617) 918-1767 and Respondent’s counsel, Mathew Todaro, at mtodaro@verrill-law.com or (207) 253-4932. Thank you for your attention to this matter.

Respectfully submitted,

Laura J. Berry
Enforcement Counsel

Enclosures: Proposed Consent Agreement and Final Order
Proposed Certificate of Service

cc: Wanda Santiago, Regional Hearing Clerk
Mathew Todaro, Counsel for Houghton Chemical Corp.