



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

FILED

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U.S. EPA REGION 1  
HEARING CLERK

Michael J. Knapp, Regional Judicial Officer  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100, Mail Code 4-MI  
Boston, MA 02109-3912  
[Knapp.Michael@epa.gov](mailto:Knapp.Michael@epa.gov)

Re: Proposed Administrative Consent Agreement and Final Order  
*In the Matter of Avise Properties Inc. et al.*  
Docket No. TSCA-01-2025-0069

Dear Mr. Knapp:

Attached for your review and signature is a Consent Agreement and Final Order (“CAFO”) that will resolve alleged violations of the Toxic Substances Control Act (“TSCA”), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (“the Act”), and the federal regulations promulgated thereunder, entitled “Lead: Requirements for Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards Upon Sale or Lease of Residential Property” (the “Disclosure Rule”), brought by the U.S. Environmental Protection Agency (“EPA”), Region 1, against Avise Properties, Inc., First Laconia Associates, LLC, and Union Street MHT Associates, LLC (collectively “Respondents”).

As permitted by 40 C.F.R. § 22.13(b), this CAFO both initiates and concludes EPA’s enforcement action against Respondents. Section III of the CAFO describes the Respondents’ violations of the Disclosure Rule, including the failure: (1) to include as an attachment or within the contract to lease target housing a statement by the lessee affirming receipt of the EPA-Approved Lead-Hazard Information Pamphlet; (2) to include in or attached to the lease contract a Lead Warning Statement; (3) to disclose to lessees in or attached to the lease contract the presence of known lead-based paint/and or lead-based paint hazards; and (4) to include in or attached to the lease contract a list of records or reports pertaining to the presence of known lead-based paint and/or lead-based paint hazards in the target housing being leased.

Under the terms of the CAFO, Respondents will pay a settlement penalty of \$87,918 within 30 days of the CAFO’s effective date. EPA has determined that the settlement penalty is consistent with TSCA’s statutory penalty factors and the *Section 1018 – Disclosure Rule Enforcement Response and Penalty Policy* (December 2007). There is no public notice requirement for this settlement.

If you have any questions regarding the proposed CAFO, please contact me at [decambre.peter@epa.gov](mailto:decambre.peter@epa.gov) or 617-918-1890, and Respondents Simir Khanna at [samir@aviseproperties.com](mailto:samir@aviseproperties.com) and Raja Khanna [raja@aviseproperties.com](mailto:raja@aviseproperties.com) or at (603) 432-7070.

Sincerely,

Peter DeCambre  
Counsel for Complainant EPA  
U.S. Environmental Protection Agency, Region 1

Attachments:

1. Proposed Consent Agreement and Final Order
2. Certificate of Service

cc via email:

Simir Khanna, Respondent, [samir@aviseproperties.com](mailto:samir@aviseproperties.com)  
Raja Khanna, Respondent, [raja@aviseproperties.com](mailto:raja@aviseproperties.com)