



## MEMORANDUM

**DATE:** September 8, 2025

**RE:** Proposed Consent Agreement and Final Order for:  
*In the Matter of: E.L. Harvey & Sons, Inc. et al.*  
CWA-01-2025-0032

**FROM:** Chelsey Carel, Enforcement Counsel, EPA Region 1

**TO:** Mike Knapp, Regional Judicial Officer, EPA Region 1

In accordance with 40 C.F.R. § 22.13(b), enclosed please find a corrected proposed Consent Agreement and Final Order ("Agreement") that will simultaneously commence and settle the above-captioned action. The proposed Agreement has been signed by the parties and is now being submitted for your approval.

Per your email dated September 3, 2025, the Agreement filed with the Regional Hearing Clerk for Docket # CWA-01-2025-0032 on September 2, 2025 contained an error in Paragraph 58 on page 16 precluding your issuance of a Final Order in above-captioned matter. EPA corrected the error in Paragraph 58 and replaced pages 1-18 in the enclosed proposed Agreement. On September 5, 2025, Respondents consented to this replacement to remedy the error. Only Paragraph 58 was altered, and the terms of this proposed Agreement remain unchanged from those outlined in the September 2, 2025 Memorandum addressed to you. Consistent with your email, the error has been appropriately remedied.

I have also enclosed a Certificate of Service certifying that this Memorandum and the corrected Agreement have been filed with the Regional Hearing Clerk. The previously enclosed draft Certificate of Service remains unaltered.

Enclosures (2) (proposed corrected CAFO (pages 1-18 replaced to correct Paragraph 58); Cert. of Service)

cc via email:

Jeff Kopf, Senior Enforcement Counsel, EPA Region 1  
Matt Crockett, Region Engineer, Waste Connections of Massachusetts, Inc.  
Michael Campinell, Esq., Beveridge and Diamond PC  
Drew Silton, Esq., Beveridge and Diamond PC