

**FILED**

**9/8/25**

**2:59 PM**

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



**REGION 1**  
BOSTON, MA 02109

*Dated by electronic signature*

VIA EMAIL

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  
[Jensen.LeAnn@epa.gov](mailto:Jensen.LeAnn@epa.gov)

Re: In the Matter of C.I.L. Electroplating, Inc.  
Docket No: RCRA-01-2025-0033

Dear Mr. Knapp:

Attached for your review and signature is a Consent Agreement and Final Order ("CAFO") that will resolve a Resource Conservation and Recovery Act ("RCRA") administrative penalty action brought by the U.S. Environmental Protection Agency ("EPA"), Region 1, against C.I.L. Electroplating, Inc. ("CIL") located in Lawrence, Massachusetts.

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 CIL. The CAFO describes CIL's alleged violations of RCRA and Massachusetts Hazardous Waste Regulations identified by EPA through two October 2023 inspections of Respondent's Lawrence Facility. CIL has returned to compliance with RCRA and state regulations by properly identifying and maintaining its hazardous waste, among other corrective actions.

Under the CAFO, CIL will pay a settlement penalty of \$136,383 within 30 days of the date this CAFO becomes final. The penalty is consistent with EPA's *Resource Conservation and Recovery Act (RCRA) Civil Penalty Policy* (June 2003).

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

If you have any questions regarding the proposed CAFO, please contact me at [lee.jaegun@epa.gov](mailto:lee.jaegun@epa.gov) or 617-918-1511, and Respondent's counsel John Gardella at [jgardella@cmbg3.com](mailto:jgardella@cmbg3.com) or 617-279-8225.

Sincerely,

Jaegun Lee  
Attorney-Advisor  
EPA Region 1

Attachment (Proposed CAFO and Draft Certificate of Service)

cc : John Gardella, Counsel for Respondent  
James Coskren, C.I.L. Electroplating, Inc.