



Dated by electronic signature

VIA EMAIL

Michael 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

Re: In the Matter of ReArch Company, Inc.
Docket No: TSCA-01-2026-0012

Dear Mr. Knapp:

Attached for your review and signature is a Consent Agreement and Final Order (“CAFO”) that will resolve an administrative penalty action brought by the U.S. Environmental Protection Agency, Region 1 (“EPA”) against ReArch Company, Inc. for alleged violations of the Toxic Substances Control Act (“TSCA”) and the Renovation, Repair and Painting Rule set forth at 40 C.F.R. Part 745, Subpart E (the “RRP Rule”).

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 the Respondent. The CAFO describes the four RRP Rule violations identified by EPA following a February 2025 inspection.

Under the CAFO, the Respondent will pay a settlement penalty of \$18,715. This penalty amount is consistent with the applicable *Revised Interim Final Consolidated Enforcement Response and Penalty Policy for the RRP Rule*. The CAFO also includes a certification that Respondent has corrected the violations. There are no public notice requirements for this CAFO.

The parties’ consent to the use of digital signatures and Respondent’s consent to electronic service are included in the CAFO. The parties’ service email addresses are included in the CAFO and 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 or 617-918-1511, and the Respondent's legal counsel Jon Schaefer at (860) 275-8349 or jschaefer@rc.com.

Sincerely,

Jaegun Lee
Attorney-Advisor
EPA Region 1

Attachment (Proposed CAFO and Draft Certificate of Service)

cc : Jonathan Schaefer, Counsel for Respondent