



REGION 4

ATLANTA, GA 30303

February 4, 2026

ELECTRONIC MAIL

CONFIRMATION OF EMAIL RECEIPT REQUESTED

Thomas R. Brugato, Esquire
Covington & Burling LLP
850 Tenth Street NW
Washington D.C. 20001
tbrugato@cov.com

Re: Carrier Corporation
Revised Proposed Consent Agreement and Final Order
Docket No.: FIFRA-04-2025-3022(b)

Dear Thomas R. Brugato:

Enclosed is the revised proposed Consent Agreement and Final Order (CAFO) resulting from settlement discussions to resolve alleged violations of the Federal Insecticide, Fungicide, and Rodenticide Act by the referenced party. The CAFO includes the previously agreed to civil penalty. Within seven (7) calendar days, please review the proposed CAFO and have the designated representative sign a hard copy of the document. **Please do not place any marks, initials, or other extraneous writing on the pages of the original CAFO and only sign where indicated in the CAFO.** A scanned version of the signed document should be emailed to the U.S. Environmental Protection Agency's Case Development Officer (CDO) in this matter, Deborah Ortiz, at ortiz.deborah@epa.gov. Please keep the original signature page for your records.

Alternatively, the designated representative may sign the CAFO electronically with a "valid electronic signature," pursuant to the EPA's Cross-Media Electronic Reporting Rule (CROMERR). 40 C.F.R. § 3.3. To establish a "valid electronic signature," the software used to sign the document must embed information in the document, identifying the signer's identity and the time and date that the signature was applied to the document. Electronic signatures created using certificate-based software can constitute a "valid electronic signature" for CROMERR purposes; however, the electronic signature must be placed only on the signature page where indicated and there should be no other markings of any kind anywhere else on the document. If you have any questions about whether an electronic signature will be accepted as a "valid electronic signature," please contact the CDO. After signing electronically, do not lock the document. Please return the electronically signed CAFO to the CDO at the email address listed above.

Once all signatures are obtained, the EPA will forward the CAFO to the Regional Judicial Officer for signature and send you a copy of the fully executed document. The CAFO is effective on the date it is filed with the Regional Hearing Clerk. The penalty due date is calculated from that date as well. **Please do not submit any penalty payment prior to receiving the copy of the final CAFO.**

Thank you for your assistance in resolving this matter. If you have any legal questions, please contact Roberto Buso at (404) 562-8530 or by email at buso.roberto@epa.gov. For technical questions, please contact Deborah Ortiz at (404) 562-8230 or by email at the email address listed above.

Sincerely,

F. Bryce Covington
Acting Chief
Chemical Safety and Land Enforcement Branch