



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

January 30, 2013

REPLY TO THE ATTENTION OF:

LC-8J

CERTIFIED MAIL

Receipt No. 7009 1680 0000 7641 4975

Brady Worldwide, Inc.
c/o Ms. Linda Benfield, Esq.
Foley and Lardner, LLP
777 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-5305

Consent Agreement and Final Order, In the Matter of
Brady Worldwide, Inc. Docket No. EPCRA-05-2013-0008


Dear Ms. Benfield:

Enclosed is a copy of a fully executed Consent Agreement and Final Order in resolution of the above case. This document was filed on January 30, 2013, with the Regional Hearing Clerk.

The civil penalty in the amount of \$81,400 is to be paid in the manner described in paragraphs 105 and 106. In the comment or description field of the electronic funds transfer, please state: Brady Worldwide, Inc., and the docket number of this CAFO (above). Payment is due by March 1, 2013 (within 30 calendar days of the filing date).

Thank you for your cooperation in resolving this matter.

Sincerely,


for Meghan Dunn

Pesticides and Toxics Compliance Section

Enclosures

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO and its right to appeal this CAFO.

9. Respondent certifies that it is complying with Section 313 of EPCRA, 42 U.S.C. § 11023.

Statutory and Regulatory Background

10. Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. §§ 372.22 and 372.30 require the owner or operator of a facility that has 10 or more full-time employees; is covered by certain Standard Industrial Classification (SIC) codes; meets one of the criteria set forth in 40 C.F.R. § 372.22(b)(1)-(3); and manufactured, processed or otherwise used a toxic chemical in an amount exceeding an applicable threshold quantity of that chemical listed under Section 313(f) of EPCRA and 40 C.F.R. § 372.25, during the calendar year, to complete and submit a toxic chemical release inventory form (Form R) to the Administrator of EPA and to the state in which the subject facility is located by July 1 for each toxic chemical manufactured, processed or otherwise used in quantities exceeding the established threshold during the preceding calendar year.

11. As set forth in Section 313(f) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. § 372.25, except as provided in 40 C.F.R. §§ 372.27 and 372.28, the reporting threshold amount for a toxic chemical manufactured or processed at a facility is 25,000 pounds for calendar years including and subsequent to 1989. The reporting threshold for a toxic chemical otherwise used at a facility is 10,000 pounds for calendar years including and

subsequent to 1987.

12. Section 325(c) of EPCRA, 42 U.S.C. § 11045(c), authorizes the Administrator of EPA to assess a civil penalty of up to \$25,000 per day for each violation of Section 313 of EPCRA. The Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461 note (1990), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 note (1996), required federal agencies to issue regulations adjusting for inflation the maximum civil penalties that may be assessed pursuant to each agency's statutes. EPA may assess a civil penalty of up to \$37,500 per day for each violation of Section 313 of EPCRA that occurred after January 12, 2009, pursuant to Section 325(c)(1) and (3) of EPCRA, 42 U.S.C. § 11045(c)(1) and (3), and 40 C.F.R. Part 19.

Factual Allegations and Alleged Violations

13. Respondent is a "person" as that term is defined at Section 329(7) of EPCRA, 42 U.S.C. § 11049(7).

14. At all times relevant to this CAFO, Respondent was an owner or operator of the facility located at 2230 West Florist Avenue, Glendale, Wisconsin (facility).

15. At all times relevant to this CAFO, Respondent had "10 or more full-time employees," as defined at 40 C.F.R. § 372.3, and was an employer at the facility.

16. Respondent's facility consists of buildings, equipment, structures and other stationary items which are located on a single site or on contiguous or adjacent sites and which are owned or operated by the same person.

17. Respondent's facility is a "facility" as that term is defined at Section 329(4) of EPCRA, 42 U.S.C. § 11049(4).

18. The facility has a SIC code of 2679, a covered SIC code as defined at Section 313 of

EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.22.

19. On July 30, 2010, a representative of EPA inspected Respondent's facility.

Count 1

20. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

21. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is processed during the 2009 calendar year is 25,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(a).

22. During the 2009 calendar year, Respondent's facility processed 57,799 pounds of styrene, CAS No. 100-42-5.

23. Styrene is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

24. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for styrene for the 2009 calendar year on or before July 1, 2010.

25. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for styrene for the 2009 calendar year on or before July 1, 2010.

26. On July 6, 2010, Respondent submitted to the Administrator of EPA a Form R for styrene for the 2009 calendar year.

27. Respondent's failure to submit timely to the Administrator of EPA a Form R for styrene for the 2009 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count 2

28. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

29. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is otherwise used during the 2009 calendar year is 10,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(b).

30. During the 2009 calendar year, Respondent's facility otherwise used 29,556 pounds of n-hexane, CAS No. 110-54-3.

31. N-hexane is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

32. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for n-hexane for the 2009 calendar year on or before July 1, 2010.

33. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for n-hexane for the 2009 calendar year on or before July 1, 2010.

34. On July 6, 2010, Respondent submitted to the Administrator of EPA a Form R for n-hexane for the 2009 calendar year.

35. Respondent's failure to submit timely to the Administrator of EPA a Form R for n-hexane for the 2009 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count 3

36. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

37. The reporting threshold for a chemical identified at Section 313(c) of EPCRA,

42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is otherwise used during the 2009 calendar year is 10,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(b).

38. During the 2009 calendar year, Respondent's facility otherwise used 13,888 pounds of n-methyl-2-pyrrolidone, CAS No. 872-50-4.

39. N-methyl-2-pyrrolidone is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

40. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for n-methyl-2-pyrrolidone for the 2009 calendar year on or before July 1, 2010.

41. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for n-methyl-2-pyrrolidone for the 2009 calendar year on or before July 1, 2010.

42. On July 6, 2010, Respondent submitted to the Administrator of EPA a Form R for n-methyl-2-pyrrolidone for the 2009 calendar year.

43. Respondent's failure to submit timely to the Administrator of EPA a Form R for n-methyl-2-pyrrolidone for the 2009 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count 4

44. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

45. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is processed during the 2009 calendar year is 25,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(a).

46. The reporting threshold for a chemical identified at Section 313(c) of EPCRA,

42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is otherwise used during the 2009 calendar year is 10,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(b).

47. During the 2009 calendar year, Respondent's facility processed 89,634 pounds and otherwise used 18,143 pounds of xylene, CAS No. 1330-20-7.

48. Xylene is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

49. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for xylene for the 2009 calendar year on or before July 1, 2010.

50. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for xylene for the 2009 calendar year on or before July 1, 2010.

51. On July 6, 2010, Respondent submitted to the Administrator of EPA a Form R for xylene for the 2009 calendar year.

52. Respondent's failure to submit timely to the Administrator of EPA a Form R for xylene for the 2009 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count 5

53. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

54. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is processed during the 2009 calendar year is 25,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(a).

55. The reporting threshold for a chemical identified at Section 313(c) of EPCRA,

42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is otherwise used during the 2009 calendar year is 10,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(b).

56. During the 2009 calendar year, Respondent's facility processed 254,054 pounds and otherwise used 350,738 pounds of toluene, CAS No. 108-88-3.

57. Toluene is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

58. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for toluene for the 2009 calendar year on or before July 1, 2010.

59. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for toluene for the 2009 calendar year on or before July 1, 2010.

60. On July 6, 2010, Respondent submitted to the Administrator of EPA a Form R for toluene for the 2009 calendar year.

61. Respondent's failure to submit timely to the Administrator of EPA a Form R for toluene for the 2009 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count 6

62. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

63. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is processed during the 2008 calendar year is 25,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(a).

64. During the 2008 calendar year, Respondent's facility processed 75,036 pounds of

styrene, CAS No. 100-42-5.

65. Styrene is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

66. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for styrene for the 2008 calendar year on or before July 1, 2009.

67. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for styrene for the 2008 calendar year on or before July 1, 2009.

68. On September 21, 2009, Respondent submitted to the Administrator of EPA a Form R for styrene for the 2008 calendar year.

69. Respondent's failure to submit timely to the Administrator of EPA a Form R for styrene for the 2008 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count 7

70. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

71. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is processed during the 2008 calendar year is 25,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(a).

72. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is otherwise used during the 2008 calendar year is 10,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(b).

73. During the 2008 calendar year, Respondent's facility processed 28,060 pounds and

otherwise used 50,350 pounds of n-hexane, CAS No. 110-54-3.

74. N-hexane is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

75. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for n-hexane for the 2008 calendar year on or before July 1, 2009.

76. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for n-hexane for the 2008 calendar year on or before July 1, 2009.

77. On September 21, 2009, Respondent submitted to the Administrator of EPA a Form R for n-hexane for the 2008 calendar year.

78. Respondent's failure to submit timely to the Administrator of EPA a Form R for n-hexane for the 2008 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count 8

79. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

80. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is otherwise used during the 2008 calendar year is 10,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(b).

81. During the 2008 calendar year, Respondent's facility otherwise used 27,045 pounds of n-methyl-2-pyrrolidone, CAS No. 872-50-4.

82. N-methyl-2-pyrrolidone is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

83. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for n-methyl-2-pyrrolidone for the 2008 calendar year on or before July 1, 2009.

84. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for n-methyl-2-pyrrolidone for the 2008 calendar year on or before July 1, 2009.

85. On September 21, 2009, Respondent submitted to the Administrator of EPA a Form R for n-methyl-2-pyrrolidone for the 2008 calendar year.

86. Respondent's failure to submit timely to the Administrator of EPA a Form R for n-methyl-2-pyrrolidone for the 2008 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count 9

87. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

88. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is otherwise used during the 2008 calendar year is 10,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(b).

89. During the 2008 calendar year, Respondent's facility otherwise used 23,233 pounds of xylene, CAS No. 1330-20-7.

90. Xylene is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

91. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for xylene for the 2008 calendar year on or before July 1, 2009.

92. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for xylene for the 2008 calendar year on or before July 1, 2009.

93. On September 21, 2009, Respondent submitted to the Administrator of EPA a Form R for xylene for the 2008 calendar year.

94. Respondent's failure to submit timely to the Administrator of EPA a Form R for xylene for the 2008 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Count 10

95. Complainant incorporates paragraphs 1 through 19 of this Complaint as if set forth in this paragraph.

96. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is processed during the 2008 calendar year is 25,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(a).

97. The reporting threshold for a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65 that is otherwise used during the 2008 calendar year is 10,000 pounds. 42 U.S.C. § 11023(f) and 40 C.F.R. § 372.25(b).

98. During the 2008 calendar year, Respondent's facility processed 290,652 pounds and otherwise used 647,383 pounds of toluene, CAS No. 108-88-3.

99. Toluene is a chemical identified at Section 313(c) of EPCRA, 42 U.S.C. § 11023(c), and listed at 40 C.F.R. § 372.65.

100. Section 313 of EPCRA, 42 U.S.C. § 11023, required Respondent to submit to the Administrator of EPA and to Wisconsin a Form R for toluene for the 2008 calendar year on or before July 1, 2009.

101. Respondent failed to submit to the Administrator of EPA and to Wisconsin a Form R for toluene for the 2008 calendar year on or before July 1, 2009.

102. On September 21, 2009, Respondent submitted to the Administrator of EPA a Form R for toluene for the 2008 calendar year.

103. Respondent's failure to submit timely to the Administrator of EPA a Form R for toluene for the 2008 calendar year violated Section 313 of EPCRA, 42 U.S.C. § 11023, and 40 C.F.R. § 372.30.

Civil Penalty

104. Pursuant to Section 325 of EPCRA, 42 U.S.C. § 11045, Complainant determined that an appropriate civil penalty to settle this action is \$81,400. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violations, and with respect to Respondent, its ability to pay, prior history of violations, economic benefit or savings resulting from the violations, and any other matters as justice may require. Complainant also considered EPA's Enforcement Response Policy for Section 313 of the Emergency Planning and Community Right-to-Know Act (1986) and Section 6607 of the Pollution Prevention Act (1990) (amended) (April 12, 2001).

105. Within 30 days after the effective date of this CAFO, Respondent must pay a \$81,400 civil penalty for the EPCRA violations by one of the following methods:

Check sent by regular U.S. Postal Service mail: sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

The check must note Brady Worldwide, Inc. and the docket number of this CAFO.

Check sent by express mail: sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

U.S. Bank
Government Lockbox 979077
U.S. EPA Fines and Penalties
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, Missouri 63101

The check must note Brady Worldwide, Inc. and the docket number of this CAFO.

By electronic funds transfer: electronic funds transfer, payable to "Treasurer, United States of America," and sent to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read:
"D 68010727 Environmental Protection Agency"

In the comment or description field of the electronic funds transfer, state Brady Worldwide, Inc. and the docket number of this CAFO.

By Automated Clearinghouse (ACH) also known as REX or remittance express: ACH electronic funds transfer, payable to "Treasurer, United States of America," and sent to:

US Treasury REX/Cashlink ACH Receiver
ABA: 051036706
Account Number: 310006, Environmental Protection Agency
CTX Format Transaction Code 22 –checking

In the comment area of the electronic funds transfer, state Brady Worldwide, Inc. and the docket number of this CAFO.

By on-line payment: To pay on-line, go to <https://www.pay.gov/paygov/>. Use the Search Public Forms option on the tool bar and enter SFO 1.1 in the search field. Open the form and complete the required fields.

106. Respondent must send a notice of payment that states Respondent's name, complete address, and the case docket number to EPA at the following addresses when it pays the penalty:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Meghan Dunn (LC-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Thomas Turner (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

107. This civil penalty is not deductible for federal tax purposes.

108. If Respondent does not pay timely the civil penalty or any stipulated penalties due under paragraph 109, below, EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States enforcement expenses for the collection action. The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

109. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount

overdue under this CAFO. Interest will accrue on any amount overdue from the date the payment was due at a rate established pursuant to 31 U.S.C. § 3717. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

110. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in the CAFO.

111. This CAFO does not affect the rights of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

112. This CAFO does not affect Respondent's responsibility to comply with EPCRA and other applicable federal, state and local laws.

113. This CAFO is a "final order" for purposes of EPA's Enforcement Response Policy for Section 313 of EPCRA.

114. The terms of this CAFO bind Respondent, its successors and assigns.

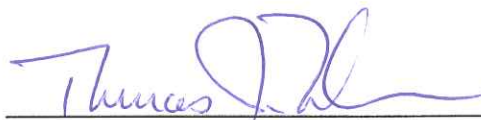
115. Each person signing this agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

116. Each party agrees to bear its own costs and attorneys fees in this action.

117. This CAFO constitutes the entire agreement between the parties.

Brady Worldwide, Inc., Respondent

4/3/2018
Date



[Person's name and title, e.g. Ms. Jane Doe
President]
[Name of Respondent]

United States Environmental Protection Agency, Complainant

1/24/2013
Date



Margaret M. Guerriero
Director
Land and Chemicals Division

In the Matter of:
Brady Worldwide, Inc.
Docket No. EPCRA-05-2013-0008

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

1-28-13

Date



Susan Hedman
Regional Administrator
United States Environmental Protection Agency
Region 5


JAN 30 2013
REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY


CERTIFICATE OF SERVICE

I hereby certify that the original signed copy of the Consent Agreement and Final Order in resolution of the civil administrative action involving Brady Worldwide, Inc., was filed on January 30, 2013, with the Regional Hearing Clerk (E-19J), U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604, and that I mailed, by Certified Mail, Receipt No. 7009 1680 0000 7641 4975, a copy of the original to the Respondent:

Brady Worldwide, Inc.
c/o Ms. Linda Benfield, Esq.
Foley and Lardner, LLP
777 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-5305


and forwarded intra-Agency copies to:

Ann Coyle, Regional Judicial Officer, ORC/C-14J
Thomas Turner, Counsel for Complainant ORC/C-14J
Eric Volck, Cincinnati Finance/MWD



Frederick Brown, PTCS (LC-8J)
U.S. EPA - Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Docket No. EPCRA-05-2013-0008


JAN 30 2013
REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY