



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**MEMORANDUM**

**DATE:** September 16, 2020

**FROM:** Andrea Simpson, Senior Enforcement Counsel, Office of Regional Counsel

**TO:** LeAnn Jensen, Regional Judicial Officer

**RE:** Proposed Administrative Consent Agreement and Final Order  
*In the Matter of Electric Motion, Co., Inc.*; Docket No. EPCRA-01-2020-0035

Enclosed is a proposed Consent Agreement and Final Order (“CAFO”) that has been signed by both parties and is now being submitted for your approval in accordance with 40 C.F.R. § 22.18(b). If signed by you, the CAFO will both initiate and resolve an action for civil administrative penalties against Respondent, Electric Motion Co., Inc. (“Respondent”), for violations of Section 313 of the Emergency Planning and Community Right-To-Know Act (“EPCRA”), 42 U.S.C. § 11023, and the federal regulations set forth at 40 C.F.R. Part 372.

The enclosed CAFO requires Respondent to pay a total civil penalty of \$36,006 within 30 days of the effective date of the CAFO to resolve liability for the EPCRA violations alleged by EPA. The settlement complies with 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)* (April 12, 2001).

Once the Final Order has been signed, EPA will file the fully executed CAFO with the Regional Hearing Clerk, thereby resolving this matter. This settlement does not have any public notice requirements.

cc: Emilee Scott, Esq.