



U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 1 - NEW ENGLAND

5 Post Office Square, Suite 100

Boston, MA 02109-3912

Dated by electronic signature below

Ms. LeAnn Jensen
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

Re: In the Matter of Stavro Fine Finishes dba Fresh Coats Painting,
Docket No. TSCA-01-2023-0038

Dear Ms. Jensen:

In accordance with revised Regional procedures, this letter is being transmitted to you via a separate letter sent by the U.S. Environmental Protection Agency, Region 1 (“EPA”) to the Regional Hearing Clerk (“RHC”) regarding the pending settlement of the above-captioned administrative enforcement action against Stavro Fine Finishes dba Fresh Coats Painting (“Stavro”). Both parties have signed a Consent Agreement and Final Order (“CAFO”) that will settle the case. The CAFO executed by the parties is being transmitted to you for your review and approval.

As permitted by 40 C.F.R § 22.13(b), the CAFO will both commence and conclude EPA’s enforcement action against Stavro. Section III of the CAFO describes Stavro’s alleged violations of the Toxic Substances Control Act (“TSCA”) and the Renovation, Repair and Painting Rule (“RRP Rule”), which occurred as a part of Stavro’s residential property renovation services, including residential and commercial painting, at its business based in South Windsor, CT.

Specifically, Stavro failed ensure that painting jobs performed at pre-1978 housing were performed by an RRP certified firm and performed by certified employees. Stavro also failed to obtain from the owners of such properties written acknowledgments that the owner had received the Renovate Right lead information pamphlet. Stavro additionally failed to retain the necessary records for 3 years following the completion of these renovations at pre-1978 housing.

Under the terms of the CAFO, Respondent has agreed to pay a civil monetary penalty of \$18,454 within 6 months of the CAFO’s effective date following the payment schedule (which includes the payment of interest) as described in Section IV of the CAFO. The penalty complies with RRP Rule penalty assessment factors and with EPA’s penalty policies. As stated in the CAFO, EPA has determined that this payment plan is in the best interest of the United States.

Ms. LeAnn Jensen, Regional Judicial Officer
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After the Final Order has been signed, please transmit the fully executed CAFO to the Regional Hearing Clerk for filing and service on the parties. The parties' consent to the use of digital signatures (as well as Respondent's consent to electronic service of the CAFO, once filed) is included in the CAFO. This settlement does not have any public notice requirements.

If you have any questions regarding the proposed CAFO, please contact me at edwards.megan@epa.gov or 617-918-1542, and Respondent's counsel Kenneth Slater at Slater@halloransage.com or 860-297-4662. Thank you for your attention to this matter.

Sincerely,

Megan Edwards
Counsel for Complainant EPA
U.S. Environmental Protection Agency, Region 1

Attachments:

1. Proposed Consent Agreement and Final Order
2. Proposed Certificate of Service

cc: Kenneth Slater, Counsel for Respondent Stavro Fine Finishes