

Richard J. McNeil (SBN 116438)  
CROWELL & MORING LLP  
3 Park Plaza, Suite 2000  
Irvine, CA 92614  
Telephone: 949-263-8400  
Facsimile 949-263-8414  
rmcneil@crowell.com  
Attorneys for VSS INTERNATIONAL, INC.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ENVIRONMENTAL APPEALS BOARD

IN THE MATTER OF

**VSS INTERNATIONAL, INC.**  
3785 Channel Drive  
West Sacramento, CA

Respondent.

DOCKET NO. OPA 09-2018-0002

**RESPONDENT VSS INTERNATIONAL, INC.'S  
NOTICE OF APPEAL FOLLOWING INITIAL  
DECISION AND ORDER**

Presiding Officer: Chief Administrative Law Judge  
Susan L. Biro

Date of Initial Decision and Order: September 16, 2020

Notice is hereby given that Respondent VSS International, Inc. (“Respondent” or “VSSI”) hereby appeals to the United States Environmental Protection Agency Environmental Appeals Board the conclusion and order and civil penalty assessed and ordered in the Initial Decision of United States Environmental Protection Agency Before the Administrator, Presiding Officer Chief Administrative Law Judge Susan L. Biro dated September 16, 2020.

Dated: October 16, 2020

CROWELL & MORING LLP

A handwritten signature in blue ink, appearing to read "Richard J. McNeil", is written over a light blue circular stamp.

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Richard J. McNeil  
Attorneys for Respondent  
VSS INTERNATIONAL, INC

CERTIFICATE OF SERVICE

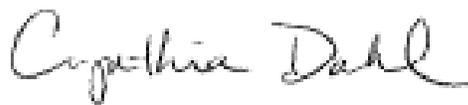
I, Cynthia Dahl, hereby certify that on October 16, 2020, I caused to be filed electronically, the foregoing **RESPONDENT VSS INTERNATIONAL, INC.'S NOTICE OF APPEAL** in the Matter of VSS International, Inc., Docket No. OPA 09-2018-0002, using the EAB eFiling system and on the Headquarters Hearing Clerk and Presiding Officer using the OALJ E-Filing System.

Additionally, I, Cynthia Dahl, hereby certify that on October 16, 2020, I served a true and correct copy of the foregoing **RESPONDENT VSS INTERNATIONAL, INC.'S NOTICE OF APPEAL** in the Matter of VSS International, Inc via electronic mail to the following attorneys for the EPA:

Rebecca Sugerman at [Sugerman.rebecca@epa.gov](mailto:Sugerman.rebecca@epa.gov)  
Rebekah Reynolds at [Reynolds.rebekah@epa.gov](mailto:Reynolds.rebekah@epa.gov)  
Andrew Hemlinger at [Helmlinger.andrew@epa.gov](mailto:Helmlinger.andrew@epa.gov)

Dated: October 16, 2020

Respectfully Submitted,



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Cynthia Dahl