

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 7  
11201 RENNER BOULEVARD  
LENEXA, KANSAS 66219**

Received by  
EPA Region 7  
Hearing Clerk

**BEFORE THE ADMINISTRATOR**

**In the Matter of:** )  
 )  
 **Dynasty Restoration Inc.** ) **Docket No. TSCA-07-2022-0066**  
 )  
 **Respondent.** )  
 \_\_\_\_\_ )

**JOINT MOTION TO WITHDRAW PREVIOUSLY FILED EXPEDITED SETTLEMENT  
AGREEMENT AND FINAL ORDER AND FOR LEAVE TO FILE AMENDED  
EXPEDITED SETTLEMENT AGREEMENT AND FINAL ORDER**

The U.S. Environmental Protection Agency (“EPA”) and Respondent Dynasty Restoration Inc (“Respondent”), hereby jointly move to withdraw the Expedited Settlement Agreement (“Original ESA”) previously filed with, and executed by, the Regional Judicial Officer on February 7, 2023. The parties also jointly move for leave to file the attached Expedited Settlement Agreement and Final Order (“Amended ESA”) for the Regional Judicial Officer’s consideration. In support of this Motion, the parties state as follows:

1. This matter was resolved in January of 2023 for a civil penalty of \$600, which Respondent has already paid.
2. On February 7, 2023, counsel for EPA filed the Original ESA, which was then signed by the Regional Judicial Officer.
3. After filing the Original ESA, it was discovered that, due to an inadvertent error by EPA’s counsel, paragraph 11 of the Original ESA incorrectly stated that the civil penalty was \$3,000. Paragraph 11 of the Original ESA should have included the correct penalty amount of \$600.

4. Therefore, the parties hereby request that the Original ESA be withdrawn.
5. In order to correct this error, the parties hereby seek leave to file the attached Amended ESA, paragraph 11 of which states the correct penalty of \$600.

WHEREFORE, based on the foregoing reasons, and in the interests of justice, the parties jointly request that the Original ESA be withdrawn and leave be granted to file the attached Amended ESA.

Respectfully submitted,

---

Britt Bieri  
Assistant Regional Counsel  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 7  
bieri.britt@epa.gov  
*Counsel for EPA*

---

  
J.R. Rocha  
CEO  
Dynasty Restoration Inc.  
jr@dynastyrestores.com  
*Respondent*

**CERTIFICATE OF SERVICE**

I certify that that a true and correct copy of the foregoing Motion in EPA Docket No. TSCA-07-2022-0066, was sent this day in the following manner to the following addressee:

Copy via e-mail to Respondent:

J.R. Rocha  
CEO  
Dynasty Restoration Inc.  
jr@dynastyrestores.com

Dated this 21st day of June, 2023.

---