



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

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June 27, 2013

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency - Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

BY HAND

Re: *In re Woodstock Resort Corporation*
Docket No. TSCA-01-2013-0018

Dear Ms. Santiago:

Enclosed for filing in the above-referenced action, please find the original and one copy of an Administrative Complaint and Opportunity to Request a Hearing and a Certificate of Service.

Thank you for your attention to this matter.

Sincerely,

Maximilian Boal
Enforcement Counsel

Enclosure

cc: Chester Williamson, President-CEO, Woodstock Resort Corporation

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

In the Matter of:)

Woodstock Resort Corporation)
14 The Green)
Woodstock, VT 05091)

Respondent.)

**ADMINISTRATIVE COMPLAINT
AND
NOTICE OF
OPPORTUNITY FOR HEARING**

Docket No. TSCA-01-2013-0018

Proceeding under Section 16(a) of the
Toxic Substances Control Act,
15 U.S.C. § 2615(a)

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I. STATEMENT OF AUTHORITY

1. Complainant, the United States Environmental Protection Agency, Region 1 (“EPA”), issues this administrative Complaint and Notice of Opportunity for Hearing under Section 16(a) of the Toxic Substances Control Act (“TSCA”), 15 U.S.C. § 2615(a), 40 C.F.R. § 745.118, and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (“Consolidated Rules of Practice”), 40 C.F.R. Part 22.

II. NATURE OF THE ACTION

2. This Complaint notifies Respondent Woodstock Resort Corporation that EPA has determined that Respondent has violated Section 409 of TSCA, 15 U.S.C. § 2689, the Residential Lead-Based Paint Hazard Reduction Act of 1992 (“the Act”), 42 U.S.C. § 4851 *et seq.*, and the federal regulations promulgated thereunder, entitled “Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards Upon Sale or Lease of Residential Property,” as set forth at 40 C.F.R. Part 745, Subpart F (the “Disclosure Rule”). EPA seeks civil penalties pursuant to

Section 16 of TSCA, 15 U.S.C. § 2615, which provides that violations of TSCA Section 409, 15 U.S.C. § 2689, are subject to the assessment by EPA of civil and/or criminal penalties.

III. STATUTORY AND REGULATORY BASIS

3. In 1992, Congress passed the Act in response to findings that low-level lead poisoning is widespread among American children, that pre-1980 American housing stock contains more than three million tons of lead in the form of lead-based paint, and that the ingestion of lead from deteriorated or abraded lead-based paint is the most common cause of lead poisoning in children. One of the stated purposes of the Act is to ensure that the existence of lead-based paint hazards is taken into account in the rental of homes and apartments.

4. In 1996, EPA promulgated regulations to implement the Act. These regulations are set forth at 40 C.F.R. Part 745, Subpart F.

5. Pursuant to TSCA Section 401(17), 15 U.S.C. § 2681(17), and 40 C.F.R. § 745.103, the housing stock addressed by the Act's transaction requirements is termed "target housing," and is defined as any housing constructed prior to 1978, excepting housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing) or any 0-bedroom dwelling.

6. Pursuant to 40 C.F.R. § 745.103, "lessor" means any entity that offers target housing for lease, rent, or sublease.

7. The Lead-Based Paint Disclosure Rule regulations set forth at 40 C.F.R. Part 745, Subpart F, require that the lessors of target housing must take the following actions, among others, prior to lessees becoming obligated to lease target housing:

- a. Provide to lessees an EPA-approved lead hazard information pamphlet;

- b. Disclose to lessees the presence of any known lead-based paint and/or lead-based paint hazards in the target housing being leased;
- c. Include, either within or as an attachment to the lease contract, a Lead Warning Statement; and
- d. Provide lessees with any records or reports available to the lessor pertaining to lead-based paint and/or lead-based paint hazards in the target housing being leased.

8. Pursuant to Section 1018(b)(5) of the Act, 42 U.S.C. § 4852d(b)(5), and 40 C.F.R. § 745.118(e), each failure to comply with a requirement of the Disclosure Rule is a violation of Section 409 of TSCA.

9. Pursuant to Section 16(a)(1) of TSCA, 15 U.S.C. § 2615(a)(1), any person who violates a provision of Section 409 of TSCA shall be liable to the United States for a civil penalty.

10. Section 1018(b)(5) of the Act and 40 C.F.R. § 745.118(f) provide that, for purposes of enforcing the Disclosure Rule under TSCA, the penalty for each violation shall be no more than \$10,000. Pursuant to the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, and 40 C.F.R. Part 19, violations that occurred after March 15, 2004 through January 12, 2009, are subject to penalties up to \$11,000 per violation. Violations that occurred on or after January 13, 2009, are subject to penalties up to \$16,000 per violation, pursuant to the Civil Monetary Penalty Inflation Adjustment Rule at 40 C.F.R. § 19.4. See also 73 Fed. Reg. 75340 (Dec. 11, 2008).

IV. GENERAL ALLEGATIONS

11. Respondent is a corporation formed under the laws of the State of Vermont.

12. Respondent owns and operates a resort known as the Woodstock Inn & Resort located at 14 The Green, Woodstock, VT 05091.

13. At the time of the violations alleged in this Complaint, Respondent managed and offered for lease residential real estate in Woodstock, VT 05091, including the following four properties:

- a. 41 Maple Street, Woodstock, VT 05091, which is also known as the "Thompson House";
- b. 8A Pleasant Street, Woodstock, VT 05091, which is also known as the "Elcock House";
- c. 10 Court Street, Woodstock, VT 05091, which is also known as the "Cameron House"; and
- d. 4 Benson Place #2, Woodstock, VT 05091, which is also known as the "Spackman House".

14. Pursuant to 40 C.F.R. § 745.103, Respondent is the lessor of the four properties listed in Paragraph 13.

15. All four properties listed in Paragraph 13 were constructed prior to 1978 and are therefore "target housing" as defined in 40 C.F.R. § 745.103.

16. None of the target housing listed above in Paragraph 13 satisfy the requirements for an exemption to the provisions of the Act or 40 C.F.R. Part 745, Subpart F.

17. Respondent offered for lease the following units of residential housing to lessees on the dates set forth below:

- a. 41 Maple Street, Woodstock, VT 05091—A lessee signed the lease on June 23, 2009, and the lease term commenced on June 10, 2009;
- b. 8A Pleasant Street, Woodstock, VT 05091—A lessee signed the lease on July 27, 2009, and the lease term commenced on July 26, 2009;
- c. 10 Court Street, Woodstock, VT 05091—A lessee signed the lease on December 17, 2010, and the lease term commenced on August 15, 2010; and
- d. 4 Benson Place #2, Woodstock, VT 05091—A lessee signed the lease on October 15, 2010, and the lease term commenced on October 15, 2010.

18. On June 28, 2011, EPA inspectors conducted an inspection at Respondent's office located at 9 Cross Street, Woodstock, VT 05091 regarding Respondent's compliance with the Disclosure Rule with respect to its residential real estate properties in Woodstock, VT 05091.

19. During the June 28, 2011 inspection, EPA reviewed lease transaction documents provided by Respondent.

20. The documents provided by Respondent to EPA included lease transaction documents for all four properties listed above in Paragraphs 13 and 17.

21. During the inspection and subsequent investigation, EPA discovered that children under the age of six years old were living at the target housing located at 41 Maple Street, Woodstock, VT 05091 during all times relevant to this Complaint.

22. Based upon EPA's inspection, other information and documents obtained from Respondent, and EPA's subsequent investigations, EPA has identified the following violations of the Act and the Disclosure Rule.

V. VIOLATIONS

COUNT I: Failure to Provide Lead Hazard Information Pamphlets

23. Complainant re-alleges paragraphs 1 through 22.

24. Pursuant to 40 C.F.R. § 745.107(a)(1), before a lessee is obligated under a contract to lease target housing, a lessor must provide the lessee with an EPA-approved lead hazard information pamphlet, such as the EPA document entitled, "Protect Your Family From Lead in Your Home," or an equivalent pamphlet that has been approved for use in particular states by EPA.

25. Respondent failed to provide an EPA-approved lead hazard information pamphlet to the lessee who became obligated, under a contract signed on June 23, 2009, to lease the target housing located at 41 Maple Street, Woodstock, VT 05091, before the lessee became obligated under that contract to lease said housing.

26. Respondent failed to provide an EPA-approved lead hazard information pamphlet to the lessee who became obligated, under a contract signed on July 27, 2009, to lease the target housing located at 8A Pleasant Street, Woodstock, VT 05091, before the lessee became obligated under that contract to lease said housing.

27. Respondent failed to provide an EPA-approved lead hazard information pamphlet to the lessee who became obligated, under a contract signed on December 17, 2010, to lease the target housing located at 10 Court Street, Woodstock, VT 05091, before the lessee became obligated under that contract to lease said housing.

28. Accordingly, Respondent's failure to provide the lessees who leased the target housing described above in Paragraphs 25, 26, and 27 with an EPA-approved lead hazard

information pamphlet before the lessees became obligated under contracts to lease said housing constitutes three (3) violations of 40 C.F.R. § 745.107(a)(1) and Section 409 of TSCA.

COUNT II: Failure to Disclose the Presence of Any Known Lead-Based Paint/Lead-Based Paint Hazards and/or to Provide Available Reports

29. Complainant re-alleges paragraphs 1 through 28.

30. Pursuant to 40 C.F.R. § 745.107(a)(2), a lessor must disclose to the lessee the presence of any known lead-based paint and/or lead-based paint hazards in the target housing being leased before the lessee becomes obligated under a contract to lease said housing. The lessor shall also disclose any additional information available concerning known lead-based paint and/or lead-based paint hazards, such as the basis for the determination that lead-based and/or lead-based paint hazards exist, the location of the lead-based paint and/or lead-based paint hazards, and the condition of the painted surfaces.

31. Pursuant to 40 C.F.R. § 745.107(a)(4), a lessor must provide the lessee with any records or reports available to the lessor pertaining to lead-based paint and/or lead-based paint hazards in the target housing being leased before the lessee becomes obligated under a contract to lease said housing, including reports regarding lead-based paint and/or lead-based paint hazards in common areas.

32. Pursuant to 40 C.F.R. § 745.103, the term “available records” includes records in the lessor’s possession or records that were reasonably obtainable by the lessor at the time of the disclosure.

33. Respondent did not (a) disclose the presence of any known lead-based paint and/or lead-based paint hazards and/or (b) provide available records or reports pertaining to lead-based paint and/or lead-based paint hazards in the target housing located at 10 Court Street, Woodstock, VT 05091, to the lessee who became obligated, under a contract signed on December 17, 2010, to lease said target housing before the lessee became obligated under that contract to lease said housing.

34. Respondent did not (a) disclose the presence of any known lead-based paint and/or lead-based paint hazards and/or (b) provide available records or reports pertaining to lead-based paint and/or lead-based paint hazards in the target housing located at 4 Benson Place #2, Woodstock, VT 05091, to the lessee who became obligated, under a contract signed on October 15, 2010, to lease said target housing before the lessee became obligated under that contract to lease said housing.

35. At the time Respondent offered to lease the target housing described in Paragraphs 33 and 34, Respondent possessed Lead Test Kit Documentation Forms which indicated that lead paint was present at both of said target housing.

36. Respondent's failure to disclose the presence of any known lead-based paint and/or lead-based paint hazards and/or to provide the lessees who leased the target housing described in Paragraphs 33 and 34 above with the records or reports pertaining to lead-based paint and/or lead-based paint hazards in the target housing available to Respondent before said lessees became obligated under contracts to lease said housing constitutes two (2) violations of 40 C.F.R. §§ 745.107(a)(2) and/or (a)(4) and Section 409 of TSCA.

COUNT III: Failure to Include Lead Warning Statement

37. Complainant re-alleges Paragraphs 1 through 36.

38. Pursuant to 40 C.F.R. § 745.113(b)(1), each contract to lease target housing must include a Lead Warning Statement within or as an attachment to the contract.

39. Respondent failed to include a Lead Warning Statement within or as an attachment to the contract with the lessee who became obligated, under a contract signed on June 23, 2009, to lease the target housing located at 41 Maple Street, Woodstock, VT 05091, before the lessee became obligated under that contract to lease said housing.

40. Respondent failed to include a Lead Warning Statement within or as an attachment to the contract with the lessee who became obligated, under a contract signed on July 27, 2009, to lease the target housing located at 8A Pleasant Street, Woodstock, VT 05091, before the lessee became obligated under that contract to lease said housing.

41. Respondent failed to include a Lead Warning Statement within or as an attachment to the contract with the lessee who became obligated, under a contract signed on December 17, 2010, to lease the target housing located at 10 Court Street, Woodstock, VT 05091, before the lessee became obligated under that contract to lease said housing.

42. Respondent's failure to include Lead Warning Statements within or as attachments to the contracts to lease the target housing described in Paragraphs 39, 40, and 41 constitutes three (3) violations of 40 C.F.R. § 745.113(b)(1) and Section 409 of TSCA.

COUNT IV: Failure to Include a Statement by the Lessor Disclosing the Presence of Known Lead-Based Paint or Hazards, or Lack of Knowledge Thereof

43. Complainant re-alleges Paragraphs 1 through 42.

44. Pursuant to 40 C.F.R. § 745.113(b)(2), a contract to lease target housing must include as an attachment or within the lease contract a statement by the lessor disclosing the presence of known lead-based paint and/or lead-based paint hazards in the target housing being leased, or indicating no knowledge of the presence of lead-based paint and/or lead-based paint hazards.

45. Respondent failed to include, as an attachment or within the lease contracts with the following lessees, a statement disclosing the presence of known lead-based paint and/or lead-based paint hazards in the target housing being leased, or indicating the lack of knowledge of the presence of lead-based paint and/or lead-based paint hazards:

- a. Lease signed by lessee on June 23, 2009, for 41 Maple Street, Woodstock, VT 05091;
- b. Lease signed by lessee on July 27, 2009, for 8A Pleasant Street, Woodstock, VT 05091; and
- c. Lease signed by lessee on December 17, 2010, for 10 Court Street, Woodstock, VT 05091.

46. Respondent's failure to include as attachments or within the lease contracts listed in Paragraph 45 above, statements by the lessor disclosing the presence of known lead-based paint and/or lead-based paint hazards in the target housing being leased, or indicating no knowledge of the presence of lead-based paint and/or lead-based paint hazards constitutes three (3) violations of 40 C.F.R. § 745.113(b)(2) and TSCA Section 409, 15 U.S.C. § 2689.

**COUNT V: Failure to Include a List of Any Records Available to the Lessor that
Pertain to Lead-Based Paint or Hazards in the Housing, or the Failure to Indicate
That No Such Records Exist.**

47. Complainant re-alleges Paragraphs 1 through 46.

48. Pursuant to 40 C.F.R. § 745.113(b)(3), a contract to lease target housing must include as an attachment or within the contract to lease target housing a list of any records or reports available to the lessor that pertain to lead-based paint or lead-based paint hazards in the housing, or an indication that no such records exist.

49. Respondent failed to include as an attachment or within the following lease contracts, a list of records or reports that pertain to lead-based paint or lead-based paint hazards in the housing, or an indication that no such records exist:

- a. Lease signed by lessee on June 23, 2009, for 41 Maple Street, Woodstock, VT 05091; and
- b. Lease signed by lessee on July 27, 2009, for 8A Pleasant Street, Woodstock, VT 05091.

50. Respondent's failure to include, as attachments or within the lease contracts listed in Paragraph 49 above, lists of any records or reports available to the lessor that pertain to lead-based paint or lead-based paint hazards in the housing, or an indication that no such records exist constitutes two (2) violations of 40 C.F.R. § 745.113(b)(3) and TSCA Section 409, 15 U.S.C. § 2689.

VI. PROPOSED CIVIL PENALTY

51. Based on the violations described in this Complaint, EPA seeks to assess a total civil penalty of \$56,000 against Respondent. The proposed civil penalty has been determined in accordance with Section 16 of TSCA, 15 U.S.C. § 2615, the provisions of 40 C.F.R. § 745.118(f), as well as the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 and its implementing regulations at 40 C.F.R. Part 19.

52. In determining the amount of any penalty to be assessed, Section 16(a)(2)(B) of TSCA, 15 U.S.C. § 2615(a)(2)(B), requires that Complainant consider the nature, circumstances, extent, and gravity of the violations, and with respect to Respondent, its ability to pay, the effect of the proposed penalty on its ability to continue in business, any history of prior such violations, its degree of culpability, and such other matters as justice may require.

53. To assess a penalty for the alleged violations in this Complaint, Complainant has taken into account the particular facts and circumstances of this case with specific reference to EPA's December 2007 Section 1018 - Disclosure Rule Enforcement Response and Penalty Policy (the "ERP"), a copy of which is enclosed with this Complaint. The ERP provides a rational, consistent, and equitable calculation methodology for applying the statutory penalty factors enumerated above to particular cases.

54. Count I: Failure to Provide Lead Hazard Information Pamphlet. For three violations of 40 C.F.R. § 745.107(a)(1), EPA proposes a total penalty of \$21,680 as follows:

- a. For violation at 41 Maple Street where children under the age of six years were living at the target housing: \$16,000
- b. For violation at 8A Pleasant Street: \$2,840

- c. For violation at 10 Court Street: \$2,840

55. Count II: Failure to Disclose the Presence of Any Known Lead-Based Paint/Lead-Based Paint Hazards and/or to Provide Available Reports. For two violations of 40 C.F.R.

§§ 745.107(a)(2) and (a)(4), EPA proposes a total penalty of \$5,680 as follows:

- a. For violation at 10 Court Street: \$2,840
- b. For violation at 4 Benson Place #2: \$2,840

56. Count III: Failure to Include Lead Warning Statement. For three violations of 40 C.F.R. § 745.113(b)(1), EPA proposes a total penalty of \$14,760 as follows:

- a. For violation at 41 Maple Street where children under the age of six years were living at the target housing: \$11,340
- b. For violation at 8A Pleasant Street: \$1,710
- c. For violation at 10 Court Street: \$1,710

57. Count IV: Failure to Include a Statement by the Lessor Disclosing the Presence of Known Lead-Based Paint or Hazards, or Lack of Knowledge Thereof. For four violations of 40

C.F.R. § 745.113(b)(2), EPA proposes a total penalty of \$11,050 as follows:

- a. For violation at 41 Maple Street where children under the age of six years were living at the target housing: \$8,500
- b. For violation at 8A Pleasant Street: \$850
- c. For violation at 10 Court Street: \$850
- d. For violation at 4 Benson Place #2: \$850

58. Count V: Failure to Include a List of Any Records Available to the Lessor that Pertain to Lead-Based Paint or Hazards in the Housing, or the Failure to Indicate That No Such

Records Exist. For two violations of 40 C.F.R. § 745.113(b)(3), EPA proposes a total penalty of \$2,840 as follows:

- a. For violation at 41 Maple Street where children under the age of six years were living at the target housing: \$2,580
- b. For violation at 8A Pleasant Street: \$260

VII. VII. QUICK RESOLUTION

59. Under Section 22.18(a) of EPA's Consolidated Rules of Practice, Respondents have the option of resolving this matter at any time by paying in full the penalty proposed in this Complaint. Payment of the penalty may be made by a bank, cashier's or certified check, payable to "The Treasurer, United States of America." The check should also note the docket number of this Complaint (TSCA-01-2012-0022) and should be forwarded to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

In addition, at the time of payment, Respondents should also forward notice of payment of the civil penalty as well as copies of the payment check to:

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code: ORA18-1
Boston, Massachusetts 02109-3912

and

Maximilian Boal
Enforcement Counsel
U.S. Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Mail Code: OES-04-2
Boston, Massachusetts 02109-3912

If payment is made within thirty (30) days of receipt of the Complaint, Respondents need not file an Answer. If Respondents agree to pay the penalty but need additional time, Respondents may file a statement to that effect with the Regional Hearing Clerk within thirty (30) days of receipt of the Complaint. In that event, Respondents need not file an Answer, as described in the following section of this Complaint, and will be allowed sixty (60) days from receipt of the Complaint to pay the penalty. Failure to make such payment within 60 days of receipt of the Complaint may subject the Respondents to default. See 40 C.F.R. § 22.18(a).

60. Any settlement in this matter shall be made final by the issuance of a written Consent Agreement and Final Order approved by the Regional Judicial Officer, EPA Region 1.

VIII. NOTICE OF OPPORTUNITY TO REQUEST A HEARING

61. As provided by Section 16(a) of TSCA, 15 U.S.C. § 2615(a), and in accordance with 5 U.S.C. § 554, Respondent has the right to request a hearing on any material fact alleged in this Complaint. Any such hearing would be conducted in accordance with Part 22, a copy of which is enclosed with this Complaint. **To avoid being found in default, Respondent must file a written Answer within thirty (30) days of Respondent's receipt of this Complaint.** The Answer must clearly and directly admit, deny, or explain each of the factual allegations contained in this Complaint with regard to which Respondent has any knowledge. If Respondent has no knowledge of a particular fact and so states, the allegation is considered denied. Failure to deny

an allegation constitutes an admission. Respondent's Answer must also state all facts and circumstances, if any, which constitute grounds for a defense and, if desired, must specifically request an administrative hearing. If Respondent denies any material fact or raises any affirmative defense, Respondent will be considered to have requested a hearing. The Answer must be sent to:

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region I
5 Post Office Square, Suite 100 (ORA18-1)
Boston, Massachusetts 02109-3912

Respondent should also send a copy of the Answer and all other documents which Respondent files in this action to Maximilian Boal, the attorney assigned to represent EPA in this matter, at:

Maximilian Boal
Enforcement Counsel
U.S. Environmental Protection Agency
Region I
5 Post Office Square, Suite 100 (OES04-2)
Boston, Massachusetts 02109-3912

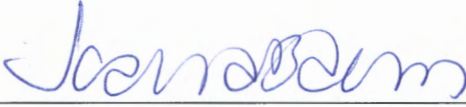
IX. INFORMAL SETTLEMENT CONFERENCE

62. Whether or not Respondent requests a hearing, Respondent may confer informally with EPA concerning the facts of this case, or the amount of the proposed penalty, and the possibility of settlement. Respondent is encouraged to contact Maximilian Boal, Enforcement Counsel, at (617) 918-1750, to discuss the legal matters relating to this Complaint or to arrange an informal settlement conference.

Please note that a request for an informal settlement conference does not extend the thirty-day period within which a written Answer must be submitted to avoid default.

Maximilian Boal, Enforcement Counsel, at the above address and telephone, has been designated to represent Complainant and is authorized to receive service of process in this action.

6/27/13
Date


Joanna Jerison
Legal Enforcement Manager
Office of Environmental Stewardship
U.S. EPA, Region 1

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

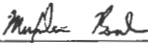
In the Matter of:)	
)	
Woodstock Resort Corp.)	Docket No. TSCA-01-2013-0018
14 The Green)	CERTIFICATE OF SERVICE
Woodstock, VT 05091)	
)	
Respondent.)	

I hereby certify that the foregoing Administrative Complaint and Notice of Opportunity for a Hearing has been sent to the following persons on the date noted below:

Original and One Copy (Hand-Delivered):	Wanda Santiago Regional Hearing Clerk U.S. EPA, Region I 5 Post Office Square, Suite 100 (ORA18-1) Boston, Massachusetts 02109-3912
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Copy, including 40 C.F.R. Part 22 and PCB Penalty Policy (Certified Mail, Return Receipt Requested):	Chester Williamson, President-CEO Woodstock Resort Corp. 14 The Green Woodstock, VT 05091
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Dated: 6/27/2013



Maximilian Boal
Enforcement Counsel
U.S. EPA, Region I
5 Post Office Square, Suite 100 (OES04-2)
Boston, Massachusetts 02109-3912