



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

June 29, 2016

RECEIVED

JUN 29 2016

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

BY HAND EPA ORC
Office of Regional Hearing Clerk

Re: Limoge Properties, L.L.C., et al.
Docket No. TSCA-01-2016-0042

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,

A handwritten signature in blue ink that reads "Kathleen E. Woodward".

Kathleen E. Woodward
Senior Enforcement Counsel

Enclosure

cc: Mary Cunningham, Partner, Limoge Properties, L.L.C. and Limoge Properties 335 South Union, L.L.C.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

RECEIVED

JUN 29 2016

In the Matter of:

Limoge Properties, L.L.C.
833 Queen City Park Road #31
South Burlington, VT 05403

Limoge Properties 335 South Union L.L.C.
833 Queen City Park Road #31
South Burlington, VT 05403

Respondents

ADMINISTRATIVE COMPLAINT
AND
NOTICE OF
OPPORTUNITY FOR HEARING

Docket No. TSCA-01-2016-0042

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

EPA ORC
New York Regional Hearing Clerk

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 Limoge Properties, L.L.C. ("Limoge") and Limoge Properties 335 South Union, L.L.C. ("Limoge S. Union") (collectively, "Respondents") that EPA has determined that Respondents have 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 (“LBP”), and that the ingestion of lead from deteriorated or abraded LBP 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 LBP 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, Subparts E and 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 six 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 LBP 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 LBP and/or LBP 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 LBP and/or LBP 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) provides 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 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. Respondents are limited liability companies formed under the laws of the Vermont.
12. Respondent Limoge owns two buildings in Essex Junction, Vermont, containing a total of 23 units.
13. At the time of the violations alleged in this Complaint, Respondent Limoge managed and offered for lease residential apartments in the two buildings referenced in Paragraph 12 including the following three properties:
 - a. 607 Dalton Dr. #4, Essex Junction, VT 05452, hereinafter referred to as “607 Dalton #4”;
 - b. 607 Dalton Dr. #12, Essex Junction, VT 05452, hereinafter referred to as “607 Dalton #12”; and
 - c. 608 Dalton Dr. #5, Essex Junction, VT 05452, hereinafter referred to as “608 Dalton St. #5”.
14. Pursuant to 40 C.F.R. § 745.103, Respondent Limoge is the “lessor” of the three properties listed on Dalton Dr. listed in Paragraph 13.
15. Both 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. Respondent Limoge offered for lease the following units of residential housing to lessees on the dates set forth below:
 - a. 607 Dalton Dr. #4 — Lessees signed the lease on May 28, 2014, and the lease term commenced on June 1, 2014;

- b. 607 Dalton Dr. #12 — A lessee signed the lease on or about March 20, 2014, and the lease term commenced on June 1, 2014;
- c. 608 Dalton Dr. #5 — Lessees signed the lease on March 21, 2014, and the lease term commenced on May 1, 2014.

17. Respondent Limoge S. Union owns a building located at 335 S. Union St., Burlington, VT 05401, containing a total of six residential housing units.

18. At the time of the violations alleged in this Complaint, Respondent Limoge S. Union managed and offered for lease residential apartments in the building referenced in Paragraph 17 including Unit #5, hereinafter referred to as “335 S. Union Street #5”.

19. Pursuant to 40 C.F.R. § 745.103, Respondent Limoge S. Union is the “lessor” of 335 S. Union Street #5.

20. The 335 S. Union St. property was constructed prior to 1978, and is, therefore, “target housing” as defined in 40 C.F.R. § 745.103.

21. Respondent Limoge S. Union offered for lease the following unit of residential housing to lessees on the following dates: 335 S. Union St. — A lessee signed the lease on November 4, 2014, and the lease term commenced on December 1, 2014.

22. On April 24, 2015, an EPA inspector conducted an inspection at the Respondents’ office located at 833 Queen City Park Road, Suite 31, South Burlington, Vermont. The purpose of the inspection was to assess Respondents’ compliance with the Disclosure Rule with respect to their residential real estate properties.

23. During and following the April 24, 2015 inspection, the EPA inspector reviewed lease transaction documents provided by Respondents.

24. The documents provided by Respondents to EPA included lease transaction documents for all four properties listed above in Paragraphs 13 and 18.

25. During the inspection, EPA learned that a child residing in 608 Dalton #6, a unit also owned by Respondent Limoge, had experienced an elevated blood level for lead (“EBL”) in 2011.

26. Following this EBL finding, in December of 2011, Limoge hired a third party to conduct a LBP survey on the interior and exterior surfaces of nine apartment units located at 608 Dalton Drive. At all times relevant to the violations alleged in this Complaint, Limoge had in its possession a written report dated January 3, 2012, documenting the findings of this LBP survey. The report states that LBP was detected on the exterior wood trim around the side windows to the parking lot entry.

27. At the time of the EPA’s inspection an infant was living in 608 Dalton #5.

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

V. VIOLATIONS

COUNT I: Failure of Limoge to Provide Records or Reports Available to the Lessor

29. Complainant re-alleges paragraphs 1 through 28.

30. Pursuant to 40 C.F.R. § 745.107(a)(2) and (a)(4), before a lessee is obligated under a contract to lease target housing, a lessor must disclose to the lessee the presence of any known LBP and/or LBP hazards and provide the lessee with any records or reports available to the lessor pertaining to LBP and/or LBP hazards in the target housing to be leased.

31. Respondent Limoge failed to disclose to the lessees of 608 Dalton Dr. #5 the presence of known LBP and/or LBP hazards before the lessees became obligated to lease said target housing on March 21, 2014.

32. Respondent Limoge failed to provide to the lessees of 608 Dalton Dr. #5 any records or reports available to the lessor regarding the presence of known LBP and/or LBP hazards before the lessees became obligated to lease said target housing on March 21, 2014.

33. Accordingly, Respondent Limoge's failure to disclose LBP and/or LBP hazards and provide records or reports to the lessees of the target housing described in Paragraphs 31 and 32 before the lessees became contractually obligated to lease said housing constitutes one (1) violation of 40 C.F.R. § 745.107(a)(2) and (a)(4) and Section 409 of TSCA.

COUNT II: Failure of Respondents to Include Lead Warning Statement

34. Complainant re-alleges paragraphs 1 through 33.

35. 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.

36. Respondent Limoge failed to include a Lead Warning Statement within or as an attachment to the contract with the lessee of 607 Dalton Dr. #4 before the lessee became obligated to lease said housing under a contract signed on May 28, 2014.

37. Respondent Limoge failed to include a Lead Warning Statement within or as an attachment to the contract with the lessee of 608 Dalton Dr. #12 before the lessee became obligated to lease said housing under a contract signed on March 20, 2014.

38. Respondent Limoge failed to include a Lead Warning Statement within or as an attachment to the contract with the lessee of 608 Dalton Dr. #5 before the lessee became obligated to lease said housing under a contract signed on March 21, 2014.
39. Respondent Limoge's failure to include Lead Warning Statements within or as attachments to the contracts to lease the target housing described in Paragraphs 36, 37, and 38 constitutes three (3) violations of 40 C.F.R. § 745.113(b)(1) and Section 409 of TSCA.
40. Respondent Limoge S. Union failed to include a Lead Warning Statement within or as an attachment to the contract with the lessee of 335 S. Union St. #4 before the lessee became obligated to lease said housing under a contract signed on November 4, 2014.
41. Respondent Limoge S. Union's failure to include a Lead Warning Statement within or as an attachment to the contract to lease the target housing described in Paragraphs 40 constitutes one (1) violation of 40 C.F.R. § 745.113(b)(1) and Section 409 of TSCA.

**COUNT III: Failure of Respondents to Include a Statement by the Lessor Disclosing
the Presence of Known LBP or Hazards, or Lack of Knowledge Thereof**

42. Complainant re-alleges Paragraphs 1 through 41.
43. 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 LBP and/or LBP hazards in the target housing being leased, or indicating no knowledge of the presence of LBP and/or LBP hazards.
44. Respondent Limoge failed to include, as an attachment or within the lease contract a statement disclosing the presence of known LBP and/or LBP hazards in the target housing being

leased, or indicating the lack of knowledge of the presence of LBP and/or LBP hazards in the lease signed by a lessee on May 28, 2014, for 607 Dalton Dr. #4.

45. Respondent Limoge failed to include, as an attachment or within the lease contract a statement disclosing the presence of known LBP and/or LBP hazards in the target housing being leased, or indicating the lack of knowledge of the presence of LBP and/or LBP hazards in the lease signed by a lessee on March 20, 2014, for 607 Dalton Dr. #12.

46. Respondent Limoge failed to include, as an attachment or within the lease contract a statement disclosing the presence of known LBP and/or LBP hazards in the target housing being leased, or indicating the lack of knowledge of the presence of LBP and/or LBP hazards in the lease signed by a lessee on March 21, 2014, for 608 Dalton Dr. #5.

47. Respondent Limoge's failure to include as attachments or within the lease contracts listed in Paragraphs 44, 45 and 46, above, statements by the lessor disclosing the presence of known LBP and/or LBP hazards in the target housing being leased, or indicating no knowledge of the presence of LBP and/or LBP hazards, constitutes three (3) violations of 40 C.F.R.

§ 745.113(b)(2) and TSCA Section 409, 15 U.S.C. § 2689.

48. Respondent Limoge S. Union failed to include, as an attachment or within the lease contract a statement disclosing the presence of known LBP and/or LBP hazards in the target housing being leased, or indicating the lack of knowledge of the presence of LBP and/or LBP hazards in a lease signed by a lessee on November 4, 2014, for 335 S. Union St. #5.

49. Respondent Limoge S. Union's failure to include as an attachment or within the lease contract listed in Paragraph 48 above, a statement by the lessor disclosing the presence of known LBP and/or LBP hazards in the target housing being leased, or indicating no knowledge

of the presence of LBP and/or LBP hazards constitutes one (1) violation of 40 C.F.R. § 745.113(b)(2) and TSCA Section 409, 15 U.S.C. § 2689.

COUNT IV: Failure of Respondents to Include a List of Any Records Available to the Lessor that Pertain to LBP or Hazards in the Housing, or the Failure to Indicate That No Such Records Exist

50. Complainant re-alleges Paragraphs 1 through 49.

51. 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 LBP or LBP hazards in the housing, or an indication that no such records exist.

52. Respondent Limoge failed to include as an attachment or within the lease contract, a list of records or reports that pertain to LBP or LBP hazards in the housing, or an indication that no such records exist, in the lease signed by a lessee on May 28, 2014, for 607 Dalton Dr. #4.

53. Respondent Limoge failed to include as an attachment or within the lease contract, a list of records or reports that pertain to LBP or LBP hazards in the housing, or an indication that no such records exist, in the lease signed by a lessee on March 20, 2014, for 607 Dalton Dr. #12.

54. Respondent Limoge's failure to include as attachments or within the lease contracts listed in Paragraphs 52 and 53, above, lists of any records or reports available to the lessor that pertain to LBP or LBP 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.

55. Respondent Limoge S. Union failed to include as an attachment or within the lease contract, a list of records or reports that pertain to LBP and LBP hazards in the housing, or an

indication that no such records exist, in the lease signed by a lessee on November 4, 2014, for 335 S. Union #5.

56. Respondent Limoge S. Union's failure to include, as an attachment or within the lease contract referenced in Paragraph 55 above, a list of any records or reports available to the lessor that pertain to LBP or LBP hazards in the housing, or an indication that no such records exist, constitutes one (1) violation of 40 C.F.R. § 745.113(b)(3) and TSCA Section 409, 15 U.S.C. § 2689.

VI. PROPOSED CIVIL PENALTY

57. Based on the violations described in this Complaint, EPA seeks to assess a total civil penalty of \$46,552.00 against the Respondents as described in Paragraphs 60 through 64, herein. 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.

58. 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 Respondents, their ability to pay, the effect of the proposed penalty on their ability to continue in business, any history of prior such violations, their degree of culpability, and such other matters as justice may require.

59. 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.

60. Count I: Failure to Provide Records or Reports.

Limoge: For one (1) violation of 40 C.F.R. § 745.107(a)(2) and (a)(4), EPA proposes a total penalty of \$16,000.00.

61. Count II: Failure to Include Lead Warning Statement.

A. Limoge: For three (3) violations of 40 C.F.R. § 745.113(b)(1), EPA proposes a total penalty of \$14,760.00 as follows:

- a. For violation at 607 Dalton Dr. #4: \$1,710.00
- b. For violation at 607 Dalton Dr. #12: \$1,710.00
- c. For violation at 608 Dalton Dr. #5: \$11,340.00

B. Limoge S. Union: For one (1) violation of 40 C.F.R. § 745.113(b)(1) at 335 S. Union St. #5, EPA proposes a total penalty of : \$1,710.00.

62. Count III: Failure to Include a Statement by the Lessor Disclosing the Presence of Known LBP or Hazards, or Lack of Knowledge Thereof.

A. Limoge: For three (3) violations of 40 C.F.R. § 745.113(b)(2), EPA proposes a total penalty of \$10,200.00 as follows:

- d. For violation at 607 Dalton Dr. #4: \$ 850.00
- e. For violation at 607 Dalton Dr. #12: \$ 850.00
- f. For violation at 608 Dalton Dr. #5: \$8,500.00

B. Limoge S. Union: For one (1) violation of 40 C.F.R. § 745.113(b)(2) at 335 S. Union St. #5, EPA proposes a total penalty of: \$850.00.

63. Count IV: Failure to Include a List of Any Records Available to the Lessor that Pertain to LBP or Hazards in the Housing, or the Failure to Indicate That No Such Records Exist.

A. Limoge: For two (2) violations of 40 C.F.R. § 745.113(b)(3), EPA proposes a total penalty of \$580.00 as follows:

For violation at 607 Dalton Dr. #4.: \$290.00

For violation at 607 Dalton Dr. #12 \$290.00

B. Limoge S. Union: For one (1) violation of 40 C.F.R. § 745.113(b)(3) at 335 S. Union St. #5, EPA proposes a total penalty of: \$290.00.

64. Inflation Multiplier: Pursuant to the Civil Monetary Penalty Inflation Adjustment Rule at 40 C.F.R. § 19.4, EPA has applied an inflation penalty adjustment multiplier of 1.0487, yielding an increase in the penalty of \$2,162.00 to account for inflation.

VII. QUICK RESOLUTION

65. 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-01-2012-0042) 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

Kathleen E. Woodward
Senior 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 sixty (60) days of receipt of the Complaint may subject the Respondents to default. See 40 C.F.R. § 22.18(a).

66. 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

67. As provided by Section 16(a) of TSCA, 15 U.S.C. § 2615(a), and in accordance with 5 U.S.C. § 554, Respondents have 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, Respondents must file a written Answer within thirty (30) days of Respondents' 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 Respondents have any knowledge. If Respondents have no knowledge of a particular fact and so states, the allegation is considered denied. Failure to deny an allegation constitutes an admission. Respondents' Answers 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 Respondents deny any material fact or raises any affirmative defense, Respondents 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

Respondents should also send a copy of the Answer and all other documents which Respondents file in this action to Kathleen E. Woodward, the attorney assigned to represent EPA in this matter, at:

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

68. The filing and service of documents, other than the complaint, rulings, orders, and decisions, in all cases before the Region 1 Regional Judicial Officer governed by the Consolidated Rules of Practice may be filed and served by email, consistent with the “Standing Order Authorizing Filing and Service by E-mail in Proceedings Before the Region 1 Regional Judicial Officer,” a copy of which has been provided with the Complaint.

IX. INFORMAL SETTLEMENT CONFERENCE

69. Whether or not Respondents request a hearing, Respondents may confer informally with EPA concerning the facts of this case, or the amount of the proposed penalty, and the possibility of settlement. Respondents are encouraged to contact Kathleen E. Woodward, Senior Enforcement Counsel, at (617) 918-1780, 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 (30) day period within which a written Answer must be submitted to avoid default.

Kathleen E. Woodward, Senior 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.

June 28, 2016
Date

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