## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 1

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In the Matter of:
<b>BUILD-IT BROS., LLC</b> 38 Mussey Road Scarborough, Maine 04074,
Respondent.
Proceeding under Section 16(a) of the Toxic Substances Control Act, 15 U.S.C. § 2615(a).

Docket No. TSCA-01-2019-0055

## **MOTION FOR DEFAULT ORDER**

The Complainant, the United States Environmental Protection Agency ("EPA"), moves

for the issuance of an order under 40 C.F.R. § 22.17, finding that Respondent, Build-It Bros.,

LLC ("Respondent" or "Build-It Bros."), is in default in this matter, and finding that Respondent

violated Section 409 of the Toxic Substances Control Act, 15 U.S.C. § 2689 ("TSCA"), and the

federal regulations promulgated thereunder, set forth at 40 C.F.R. Part 745, Subpart E (the

"Renovation, Repair and Painting Rule" or "RRP Rule"), and assessing a penalty.

In support of this Motion, EPA submits the attached Memorandum in Support of Motion

for Default Order with Exhibits 1, 2, 3, 4, 5, 6, and 7, and a Proposed Default Order.

Respectfully submitted,

(Signature and Date)

Hugh W. Martinez, Counsel for Complainant EPA Region 1