

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT NO:



Robert Mouren-Laurens
President
Vast Enterprises, Inc dba Liquid Packaging
7739 Monroe Street
Paramount, CA 90723

Re: Federal Insecticide, Fungicide, and Rodenticide Act
Complaint and Notice of Opportunity for Hearing
Docket No.: FIFRA-09-2023-0065

Dear Robert Mouren-Laurens:

Enclosed is a Complaint and Notice of Opportunity for Hearing concerning violations of the Federal Insecticide, Fungicide, and Rodenticide Act (“FIFRA”). Specifically, the complaint alleges that Vast Enterprises violated Section 12(a)(1)(A) of FIFRA by selling or distributing the unregistered pesticide, “Perfect Professional Advanced Multi-Surface Sanitizer,” on three separate occasions, violated Section 12(a)(1)(E) of FIFRA by also selling or distributing the misbranded pesticide, “Perfect Professional Advanced Multi-Surface Sanitizer,” on one occasion, and violated 12(a)(2)(L) of FIFRA by producing the pesticide, “Perfect Professional Advanced Multi-Surface Sanitizer” in an unregistered pesticide producing establishment. EPA will seek a civil penalty for these alleged violations.

You should be aware of the part of the Complaint entitled “Opportunity to Request a Hearing.” You are required to respond to this Complaint within thirty (30) days of receipt of the Complaint. If you fail to file an Answer to this Complaint with the Regional Hearing Clerk within thirty (30) days of receipt, your failure shall constitute an admission of all facts alleged in the Complaint and a waiver of your right to a hearing. The proposed civil penalty shall become due and payable sixty (60) days after a final order is issued upon default.

Copies of the following rules and regulations are included for your information: (1) the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and (2) EPA’s Enforcement Response Policy for the Federal Insecticide, Fungicide, and Rodenticide Act, dated December 2009.

If you have any questions, please contact (or have your attorney contact) Carol Bussey, Assistant Regional Counsel, at (415) 972-3950.

Sincerely,

Matt Salazar, P.E.,
Manager, Toxics Section
Enforcement and Compliance Assurance Division

Enclosures

Cc: Parissa Naef, California Department of Pesticide Regulation