

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

Received by
EPA Region 1
Hearing Clerk

_____)	
In the Matter of:)	
)	
)	Docket No. TSCA-01-2022-0027
Charles Bridge, LLC)	
P.O. Box 628)	
Old Lyme, CT 06371)	
)	
Respondent)	
)	Proceeding under Section 16(a) of the
)	Toxic Substances Control Act,
)	15 U.S.C. § 2615(a)
_____)	

MOTION FOR DEFAULT ORDER

The Complainant, the United States Environmental Protection Agency, Region 1 (“EPA”), moves for the issuance of an order under 40 C.F.R. § 22.17, finding that Respondent Charles Bridge, LLC is in default in this matter, finding that Respondent violated Section 409 of Toxic Substances Control Act (“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”) and assessing a penalty of up to \$56,109.

In support of its motion, EPA submits the attached Memorandum in Support of Default Motion, with Exhibits 1 - 6, and a Proposed Default Order.

Respectfully submitted,

Peter DeCambre
Senior Enforcement Counsel
Office of Regional Counsel
U.S. EPA, Region 1

Date: _____

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Default Order and Memorandum in Support of Motion for Default Order, with exhibits and proposed Default Order, has been sent to the following person(s) on the date noted below:

Via E-mail

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