



REGION 1

BOSTON, MA 02109

January 16, 2024

MEMORANDUM

SUBJECT: Proposed Expedited Settlement Agreement for:
In the Matter of: Lifoam Industries, LLC
CWA-01-2024-0013

FROM: Cristeen Schena, Water Compliance Specialist

TO: LeAnn Jensen, Regional Judicial Officer

In accordance with 40 C.F.R. § 22.13(b), enclosed please find a proposed Expedited Settlement Agreement (“Agreement”) that will simultaneously commence and settle the above-captioned action. The proposed Agreement has been signed by the parties and is now being submitted for your approval.

Public notice of this Agreement was provided as required by Section 309(g)(4)(A) of the Act, 33 U.S.C. § 1319(g)(4)(A) and 40 C.F.R. § 22.45. The proposed Agreement is being submitted more than 10 days after the close of the public comment period. The Regional Hearing Clerk has reported that she did not receive any comments concerning this proposed action during this period.

Under the terms of this proposed Agreement, Respondent will pay a civil penalty of \$10,000. This proposed Agreement complies with all the requirements of EPA’s Expedited Settlement Pilot Program for Industrial Non-filers. Once the proposed Agreement has been signed by you, the fully-executed Agreement will be filed with the Regional Hearing Clerk and will become final 30 days after the date of your signature.

cc: (via email)

Erik Guzzo, Plant Manager, Lifoam Industries, LLC
Wanda Santiago, Regional Hearing Clerk, U.S. EPA, Region 1
Samuel Horowitz, Enforcement Counsel, U.S. EPA, Region 1
Jeff Kopf, Senior Enforcement Counsel, U.S. EPA, Region 1