



**BY EMAIL**

*Dated via electronic signature below*

Ms. LeAnn Jensen  
Regional Judicial Officer  
U.S. EPA, Region 1 (Mail Code 4-MI)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
Jensen.LeAnn@epa.gov

Re: *In the matter of Gold Shield Construction, LLC*, Docket No. TSCA-01-2025-0015

Dear Ms. Jensen:

In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(2), and simultaneously transmitted with this letter, please find a Consent Agreement and proposed Final Order ("CAFO") settling the above-referenced action. The Consent Agreement has been signed by the parties and is now being submitted to you for approval.

If signed by you, the CAFO will resolve administrative civil penalty liability of the Respondent, Gold Shield Construction, LLC ("Gold Shield"), for alleged violations of Section 409 of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2689, and the federal regulations promulgated thereunder set forth at 40 C.F.R. Part 745, Subpart E, as amended. The alleged violations occurred at various residences at which the Respondent provided services.

Under the terms of the CAFO, the Respondent has agreed to pay a civil monetary penalty of \$31,916 under a six-month installment plan commencing within 30 days of the CAFO's effective date. The penalty complies with TSCA statutory penalty factors, the Revised Interim Final Consolidated Enforcement Response and Penalty Policy for the Pre-Renovation Education Rule; Renovation, Repair and Painting Rule; and Lead-Based Paint Activities Rule (August 2010), and the Lead-Based Paint Graduated Penalty Approach Policy. EPA has determined that this payment plan is in the best interest of the United States.

The parties' consent to the use of digital signatures (as well as Respondent's consent to electronic service of the CAFO, once filed) is included in the CAFO. Respondent chose to sign the CAFO with a "wet" signature, and EPA's official signed electronically. Accordingly, I am submitting a PDF of the executed CAFO and will file Respondent's original signature page with the Regional Hearing Clerk after I receive it in the mail. This settlement does not have any public notice requirements.

Thank you for your attention to this matter.

Respectfully submitted,

Uzma S. Bishop-Burney  
Enforcement Counsel

Cc (via email): Greg Chandler, Respondent  
Raquel Herrera-Soto, Counsel for Respondent, Harris Beach Murtha Cullina, PLLC