



Michael J. Knapp  
Regional Judicial Officer  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
knapp.michael@epa.gov

Re: Proposed Expedited Settlement Agreement  
*In the Matter of Wesley and Marcelo Home Improvement Inc.;*  
Docket No. TSCA-01-2025-0065

Dear Mr. Knapp:

In accordance with revised regional procedures, this letter is being transmitted to you via a separate letter sent by the U.S. Environmental Protection Agency, Region 1 (“EPA”) to the Regional Hearing Clerk (“RHC”) regarding the pending settlement of the above-referenced administrative enforcement action against Wesley and Marcelo Home Improvement Inc. (“Respondent”). Both Respondent and EPA have signed an Expedited Settlement Agreement (“ESA”) that will settle the case. The ESA executed by the parties is being transmitted to you for your review and approval.

As permitted by 40 C.F.R § 22.13(b), the ESA will both commence and conclude EPA’s enforcement action against Respondent. The ESA describes Respondent’s alleged violations of the Toxic Substances Control Act (“TSCA”) and the Massachusetts Deleading and Lead-Safe Renovation Regulations (“MA RRP Rule”) at properties where Respondent performed a renovation in Massachusetts. The MA RRP Rule was promulgated by the Commonwealth of Massachusetts as part of a federally approved State program authorized by the Administrator in accordance with Section 404 of TSCA, 15 U.S.C. § 2684. Specifically, Respondent failed to: (1) obtain a Lead-Safe Renovation Contractor License; and (2) retain all records necessary to demonstrate compliance with the MA RRP Rule for at least three years.

Under the terms of the ESA, Respondent has agreed to pay a civil monetary penalty of \$2,000 and certify compliance with the MA RRP Rule. The settlement complies with EPA’s *Lead-Based Paint Expedited Settlement Policy*, dated August 2015.

After the ESA has been signed, please transmit the fully executed ESA to the Regional Hearing Clerk for filing and service on the parties. The parties’ consent to the use of digital signatures (as well as Respondent’s consent to electronic service of the ESA, once filed) is included in the ESA. This settlement does not have any public notice requirements.

If you have any questions regarding the proposed ESA, please contact me at [stettz.lauren@epa.gov](mailto:stettz.lauren@epa.gov) or 202-564-2967, and Respondent, Marcelo Barbosa at [wmlhomeimprovements16@gmail.com](mailto:wmlhomeimprovements16@gmail.com) or 774-836-2241. Thank you for your attention to this matter.

Sincerely,

Lauren Stettz  
Counsel for Complainant EPA  
U.S. EPA, OECA, Federal Facilities Enforcement Office

Attachments:

1. Proposed Expedited Settlement Agreement
2. Proposed Certificate of Service

cc: Marcelo Barbosa, Respondent

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