

3. In accordance with 40 C.F.R. § 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant hereby simultaneously commences and resolves, as part of the settlement set forth herein, EPA's civil claims alleged in Section IV ("Findings of Fact and Conclusions of Law") of this Consent Agreement.

II. JURISDICTION

4. The U.S. Environmental Protection Agency has jurisdiction over the above-captioned matter pursuant to Sections 16 and 409 of TSCA, 15 U.S.C. §§ 2615 and 2689, and 40 C.F.R. §§ 22.1(a)(5) and 22.4 of the Consolidated Rules of Practice.

III. GENERAL PROVISIONS

5. For purposes of this proceeding, Respondent admits the jurisdictional allegations set forth in this Consent Agreement and the attached Final Order, hereinafter collectively referred to as the "CAFO".
6. Except as provided in Paragraph 5 of this Consent Agreement, for purposes of this proceeding, Respondent neither admits nor denies the factual allegations and legal conclusions set forth in this Consent Agreement.
7. Respondent agrees not to contest the jurisdiction of EPA with respect to the execution of this Consent Agreement, the issuance of the attached Final Order, or the enforcement of

this CAFO.

8. For purposes of this proceeding only, Respondent hereby expressly waives any right to contest any issue of law or fact set forth in this Consent Agreement and any right to appeal the accompanying Final Order.
9. Respondent consents to the issuance of this CAFO and agrees to comply with its terms and conditions.
10. Each Party to this Consent Agreement shall bear its own costs and attorney's fees.

IV. FINDINGS OF FACT AND CONCLUSIONS OF LAW

11. Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992 (the Act), 42 U.S.C. §§ 4851 to 4856, to address the need to control exposure to lead-based paint hazards. The Act amended TSCA by adding Subchapter IV – Lead Exposure Reduction, TSCA Section 401 to 412, 15 U.S.C. §§ 2681 to 2692.
12. Section 402(c) of TSCA, 15 U.S.C § 2682, required the Administrator of EPA to promulgate regulations for the certification of individuals engaged in renovation or remodeling activities in target housing, public buildings built before 1978, and commercial buildings.

13. Section 407 of TSCA, 15 U.S.C. § 2687 required that the regulations promulgated by the Administrator include such record keeping and reporting requirements as may be necessary to insure the effective implementation of TSCA Subchapter IV.

14. EPA promulgated the Renovation, Repair and Painting Rule (the “RRP Rule”) codified at 40 C.F.R. Part 745, Subpart E, Residential Property Renovation.

15. 40 C.F.R. § 745.83 defines “firm” to mean a “company, partnership, corporation, sole proprietorship or individual doing business, association, or other business entity; a Federal, State, Tribal, or local government agency; or a nonprofit organization.”

16. 40 C.F.R. § 745.83 defines “renovation” to mean the modification of any existing structure, or portion thereof, that results in the disturbance of painted surfaces, unless that activity is performed as part of an abatement as defined by 40 C.F.R. § 745.223. The term “renovation” includes (but is not limited to): the removal, modification or repair of painted surfaces or painted components (e.g., modification of painted doors, surface restoration, window repair, surface preparation activity (such as sanding, scraping, or other such activities that may generate paint dust)); the removal of building components (e.g., walls, ceilings, plumbing, windows); weatherization projects (e.g., cutting holes in painted surfaces to install blown-in insulation or to gain access to attics, planning thresholds to install weather stripping), and interim controls that disturb painted surfaces.

17. 40 C.F.R. § 745.83 defines “renovator” to mean an individual who either performs or

directs workers who perform renovations.

18. Section 401(17) of TSCA, 15 U.S.C. § 263(17), defines “target housing” to mean any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than six (6) years of age resides or is expected to reside in such housing) or any zero-bedroom dwelling.
19. Firms that perform renovations for compensation must apply to EPA for certification to perform renovations.
20. Failure to comply with any provision of 40 C.F.R. Part 745, Subpart E, of the RRP rule violates Section 409 of TSCA, 15 U.S.C. § 2689, which subjects the violator to administrative penalties under Section 16(a) of TSCA, 15 U.S.C. § 2615(a) and 40 C.F.R. § 745.87(d).
21. Respondent is and at all times referred to herein was a “person” within the meaning of 40 C.F.R. § 745.83.
22. Respondent is a “firm” as that term is defined by 40 C.F.R. § 745.83.
23. On or before April 2016, Respondent performed a “renovation” as that term is defined by 40 C.F.R. § 745.83 at 7134 Walnut Street, Baltimore, MD 21208-5914 (hereafter “Walnut Street House”).

24. On August 15, 2016 and November 16, 2016, the Maryland Department of the Environment (“MDE”) inspected the house at 7134 Walnut Street.
25. During the two inspections, the MDE inspector took photographs (“MDE Photographs”) of the Walnut Street House.
26. Seven of the MDE Photographs from November 16, 2016, show dust and debris on the floor of the Walnut Street House.
27. The November 16, 2016 MDE Photographs show that at the Walnut Street House the Respondent did not contain waste from renovation activities in order to prevent releases of dust and debris before the waste was removed from the work area for storage or disposal.
28. On December 8, 2016, two duly authorized EPA inspectors conducted an inspection at Respondent’s place of business to determine Respondent’s level of compliance with the RRP Rule.
29. During the inspection, the EPA inspectors collected renovation contracts for renovations conducted at three sites with target housing (the “three housing sites”).
30. One of the three housing sites was the Walnut Street House.

31. The other two of the three housing sites were located at 821 Virginia Avenue, Hagerstown, MD 21740-6263 (hereafter the “Virginia Avenue House”) and 825 North Augusta Avenue, Baltimore, MD 21229-1823 (hereafter the “North August Avenue House”).
32. The EPA inspectors observed that on or about April 11, 2016, Respondent signed a contract to perform a renovation at the Walnut Street House.
33. The EPA inspectors observed that on or about September 13, 2016, Respondent signed a contract to perform a renovation at the Virginia Avenue House.
34. The EPA inspectors observed that on or about November 14, 2016, Respondent signed a contract to perform a renovation at the North Augusta Avenue House.
35. Each house at the three housing sites is “target housing” as that term is defined by Section 401(17) of TSCA, 15 U.S.C. § 2681, because each was constructed before 1978.
36. In the Respondent’s files for the three housing sites, the EPA inspectors found that the Respondent did not have records showing that it had provided the property owners with EPA’s Lead Hazard Information Pamphlet.
37. In the Respondent’s files for the three housing sites, the EPA inspectors found that the Respondent did not have any records showing that it had performed all of the lead-safe

work practices described in 40 C.F.R. § 745.85(a) at the three target housing sites and did not have any records showing that it had performed all the post-renovation cleaning described in 40 C.F.R. § 745.85(b) at the three target housing sites.

V. VIOLATIONS

Count I

38. The allegations of the preceding paragraphs are incorporated by reference as though fully set forth herein.

39. Pursuant to 40 C.F.R. § 745.81(a)(2)(ii) and 40 C.F.R. § 745.89(a)(1), prior to performing renovations at target housing for compensation, firms are required to obtain certification from EPA under § 745.89(a)(1).

40. The Respondent was not EPA certified under 40 C.F.R. § 745.89(a)(1) prior to or at the time of performing renovations at the three housing sites as described herein.

41. The Respondent's failure to obtain certification prior to or at the time of performing renovations at the three housing sites constitutes a violation of 40 C.F.R.

§§ 745.81(a)(2)(ii) and 745.89(a)(1), and Section 409 of TSCA, 15 U.S.C. § 2689.

Counts II-IV

42. The allegations of the preceding paragraphs are incorporated by reference as though fully set forth herein.

43. 40 C.F.R. § 745.84(a)(1), in part, requires renovators to provide the owners of target housing with EPA's Lead Hazard Information Pamphlet.

44. During the December 8, 2016 inspection, the Respondent did not provide and the EPA inspectors did not find records showing that the Respondent had provided each of the property owners of the houses at the three housing sites with EPA's Lead Hazard Information Pamphlet.

45. Respondent's failure to provide each of the property owners of the three housing sites with EPA's Lead Hazard Information Pamphlet constitutes three violations of 40 C.F.R. § 745.84(a)(1) and Section 409 of TSCA, 15 U.S.C. § 2689.

Counts V-VII

46. The allegations of the preceding paragraphs are incorporated by reference as though fully set forth herein.

47. Pursuant to 40 C.F.R. § 745.86(b)(6), Respondent is required to retain and provide documentation of compliance with the work practice standards found in 40 C.F.R. § 745.85(a) and the post renovation cleaning verification standards found in 40 C.F.R.

§ 745.85(b).

48. During the December 8, 2016 inspection, the Respondent did not provide and the inspectors did not find records showing that the Respondent had performed all of the lead-safe work practices described in 40 C.F.R. § 745.85(a) and any records showing that it had performed all the post-renovation cleaning described in 40 C.F.R. § 745.85(b) for the houses at each of the three housing sites.

49. Respondent's failure to provide and/or retain records documenting compliance with 40 C.F.R. §§ 745.85(a) and (b) at the three housing sites constitutes three violations of 40 C.F.R. § 745.86(b)(6) and Section 409 of TSCA, 15 U.S.C. § 2689.

Count VIII

50. The allegations of the preceding paragraphs are incorporated by reference as though fully set forth herein.

51. 40 C.F.R. § 745.85(a)(4)(i) requires that renovators must contain waste from renovation activities to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal.

52. During the MDE inspection on November 16, 2016, at the Walnut Street House, the Respondent did not contain waste from renovation activities in order to prevent the

releases of dust and debris before the waste was removed from the work area for storage or disposal.

53. Respondent's failure to contain waste from renovation activities to prevent releases of dust and debris before the waste was removed from the work area for storage or disposal constitutes a violation of 40 C.F.R. § 745.85(a)(4)(i) and Section 409 of TSCA, 15 U.S.C. § 2689.

VI. CIVIL PENALTY

54. In settlement of EPA's claims for civil penalties assessable for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty of fifteen thousand one hundred sixty dollars and zero cents (\$15,160.00) which Respondent shall be liable to pay in accordance with the terms set forth below. Such civil penalty amount shall become due and payable immediately upon Respondent's receipt of a true and correct copy of this CAFO. In order to avoid the assessment of interest, administrative costs and late payment penalties in connection with such civil penalty, Respondent must pay such civil penalty no later than THIRTY (30) CALENDAR DAYS after the date on which a true and correct copy of the signed and executed CAFO is mailed or hand-delivered to Respondent.

55. The aforesaid settlement amount is based upon Complainant's consideration of a number of factors, including the penalty criteria set forth in Section 16(a)(2)(B) of TSCA, 15

U.S.C. § 2615(a)(2)(B), i.e., the nature, circumstances, extent and gravity of the violations, and with respect to the Respondent, ability to pay, effect on ability to continue to do business, any history of prior such violations, the degree of culpability, and such other matters as justice may require. These factors were applied to the particular facts and circumstances of this case with specific reference to EPA's Lead-Based Paint Consolidated Enforcement Response Policy, and 40 C.F.R. Part 19.

56. Based upon information provided by the Respondent concerning the Respondent's ability to pay and other matters at issue in this proceeding, the Complainant consents to the installment payment schedule set forth in Paragraph 60.

57. By the signature below, Respondent's representative certifies that the information submitted to EPA regarding Respondent's ability to pay and regarding any other matter at issue in this proceeding, is accurate and not misleading. Respondent and its officers, directors and principals are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability. Complainant reserves the right to seek and obtain appropriate relief if Complainant obtains evidence that the information provided and/or representations made by the Respondent to Complainant regarding Respondent's claim of inability to pay, or regarding any of other matter herein at issue, are false or, in any material respect, inaccurate.

58. The civil penalty of fifteen thousand one hundred sixty dollars and zero cents (\$15,160.00) set forth in Paragraph 54 above, may be paid in six (6) separate installments, with applicable interest at the rate of one per cent (1%) per annum on the outstanding principal balance, in accordance with the chart set out in Paragraph 60 and the payment schedule instructions set forth below.

59. The first payment under the installment plan in Paragraph 60 is due within thirty (30) days of the date on which this CAFO is mailed or hand-delivered to Respondent. The Respondent shall make each subsequent payment on the first day of the month of each following month until the principal and interest are paid.

60. The Respondent will pay a total civil penalty of fifteen thousand one hundred sixty dollars and zero cents (\$15,160.00) and a total interest payment of thirty-two dollars and fourteen cents (\$32.14) in accordance with the following table:

Payment	Principal	Interest	Payment Amount
1	\$2,566.19	\$0.00	\$2,566.19
2	\$2,555.70	\$10.49	\$2,566.19
3	\$2,557.82	\$8.37	\$2,566.19
4	\$2,559.96	\$6.23	\$2,566.19
5	\$2,562.09	\$4.10	\$2,566.19
6	\$2,358.24	\$2.95	\$2,361.19
Total:	\$15,160.00	\$32.14	\$15,192.14

61. If Respondent fails to make timely payment of any one of the required installment payments in accordance with the schedule set forth in Paragraphs 59 and 60, the entire unpaid balance of the penalty and all accrued interest shall become due immediately upon such failure, and Respondent shall immediately pay the entire remaining principal balance of the civil penalty along with any interest that has accrued up to the time of such payment. In addition, Respondent shall be liable for, and shall pay, additional interest, administrative handling charges and late payment penalty charges as described in Paragraphs 66 through 69, below, in the event of any such failure or default.
62. Respondent may elect at any time after commencing the payments under the installment schedule to pay the entire remaining principal together with the accrued interest to the date of such full payment.
63. Respondent shall remit payment for the civil penalty set forth in Paragraph 54 and Paragraphs 58 through 60, above, and/or any additional interest, administrative fees and late payment penalties due, in accordance with Paragraphs 66 through 69, below, by either cashier's check, certified check, or electronic wire transfer, in the following manner:
- a. All payments by Respondent shall reference its name and address, and the Docket Number of this action, i.e., TSCA-03-2018-0126;

- b. All payments made by check and sent by regular mail shall be addressed and mailed to:

U.S. Environmental Protection Agency
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

Contact: Craig Steffen, 513-487-2091

- c. All payments made by check and sent by overnight delivery service shall be addressed and mailed to:

U.S. Environmental Protection Agency
Cincinnati Finance Center
P.O. Box 979077
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63101

Contact: (314) 418-1028

- d. All payments made by check in any currency drawn on banks with no USA branches shall be addressed for delivery to:

Cincinnati Finance
US EPA, MS-NWD
26 W. Martin Luther King Drive
Cincinnati, OH 45268-0001

64. Respondent may also pay the civil penalty amount described in Paragraph 54 and Paragraphs 58 through 60, above, and/or any additional interest, administrative fees and late payment penalties due, in accordance with Paragraphs 66 through 69, below, electronically or on-line as follows:

- a. All payments made by electronic wire transfer shall be directed to:

Federal Reserve Bank of New York
ABA = 021030004
Account = 68010727
SWIFT Address = FRNYUS33
33 Liberty Street
New York, NY 10045
(Field Tag 4200 of the wire transfer message should read:
“D 68010727 Environmental Protection Agency”)

- b. All electronic payments made through the automated clearinghouse
(ACH), also known as Remittance Express (REX), shall be directed to:

US Treasury REX / Cashlink ACH Receiver
ABA = 051036706
Account Number: 310006, Environmental Protection Agency
CTX Format Transaction Code 22 - Checking

Physical location of U.S. Treasury facility:

5700 Rivertech Court
Riverdale, MD 20737

Contact: Craig Steffen, 513-487-2091

- c. On-Line Payment Option:

<https://www.pay.gov/public/form/start/11751879>

Open and complete the form.

- d. Additional payment guidance is available at:

<https://www.epa.gov/financial/makepayment>

65. At the same time that any payment is made, Respondent shall submit copies of the
check(s), or verification of the wire transfer(s) or electronic payment(s) to the Regional
Hearing Clerk and Mr. Philip Yeany at the following addresses:.

Philip Yeany
Senior Assistant Regional Counsel
U.S. Environmental Protection Agency

Region III (Mail Code 3RC50)
1650 Arch Street
Philadelphia, PA 19103

and

Regional Hearing Clerk
U.S. Environmental Protection Agency
Region III (Mail Code 3RC00)
1650 Arch Street
Philadelphia, PA 19103-2029

66. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, EPA is entitled to assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the costs of processing and handling a delinquent claim, as more fully described below. Accordingly, Respondent's failure to make timely payment or to comply with the conditions in this Consent Agreement and Final Order shall result in the assessment of late payment charges including interest, penalties, and/or administrative costs of handling delinquent debts.

67. Interest on the civil penalty assessed in this CAFO will begin to accrue on the date that a copy of this CAFO is mailed or hand-delivered to the Respondent. However, EPA will not seek to recover interest on any amount of the civil penalty that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. §13.11(a).

68. The costs of EPA's administrative handling of overdue debts are charged and assessed monthly throughout the period the debt is overdue. 40 C.F.R. §13.11(b). Pursuant to

Appendix 2 of EPA's Resources Management Directives - Cash Management, Chapter 9, EPA will assess a \$15.00 administrative handling charge for administrative costs on unpaid penalties for the first thirty (30) day period after the payment is due and an additional \$15.00 for each subsequent thirty (30) days the penalty remains unpaid.

69. A penalty charge of six (6) percent per year will be assessed monthly on any portion of the civil penalty that remains delinquent more than ninety (90) calendar days. 40 C.F.R. § 13.11(c). Should assessment of the penalty charge on the debt be required, it shall accrue from the first day payment is delinquent. 31 C.F.R. § 901.9(d).
70. Respondent agrees not to deduct for federal tax purposes the civil penalty specified in this Consent Agreement and the accompanying Final Order.

VII. EFFECT OF SETTLEMENT

71. The settlement set forth in this CAFO shall constitute full and final satisfaction of all civil claims for penalties, which Complainant may have under TSCA for the specific violations alleged in Section V ("Violations"), above. Compliance with this CAFO shall not be a defense to any action commenced at any time for any other violation of the federal laws and regulations administered by EPA.

VIII. OTHER APPLICABLE LAWS

72. Nothing in this CAFO shall relieve Respondent of its obligation to comply with all applicable federal, state, and local laws and regulations.

IX. CERTIFICATION OF COMPLIANCE

73. Respondent certifies to Complainant, upon investigation, to the best of its knowledge and belief, that it currently in compliance with the provisions of TSCA, the RRP Rule, i.e., 40 C.F.R. Part 745, Subpart E.

X. RESERVATION OF RIGHTS

74. This Consent Agreement and the accompanying Final Order resolve only EPA's claims for civil monetary penalties for the specific violations alleged in Section V ("Violations") herein. EPA reserves the right to commence action against any person, including Respondent, in response to any condition, which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. In addition, this settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice. Further, EPA reserves any rights and remedies available to it under TSCA, the regulations promulgated thereunder, such as the RRP Rule, and any other federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this CAFO, following its filing with the EPA Regional Hearing Clerk.

XI. PARTIES BOUND

75. This Consent Agreement and the accompanying Final Order shall apply to and be binding upon the EPA, the Respondent, and Respondent's officers and directors (in their official capacity), successors and assigns. By his or her signature below, the person signing this Consent Agreement on behalf of Respondent acknowledges that he or she is fully authorized to enter into this Consent Agreement and to legally bind Respondent to the terms and conditions of this Consent Agreement and Final Order.

XII. EFFECTIVE DATE

76. The effective date of this Consent Agreement and the accompanying Final Order is the date on which the Final Order, signed by the Regional Administrator of EPA Region III, or his designee, the Regional Judicial Officer, is filed with the EPA Regional Hearing Clerk pursuant to the Consolidated Rules of Practice.

XIII. ENTIRE AGREEMENT

77. This Consent Agreement and the accompanying Final Order constitute the entire agreement and understanding of the parties regarding settlement of all claims pertaining to the specific violations alleged herein and there are no representations, warranties, covenants, terms, or conditions agreed upon between the parties other than those expressed in this CAFO.

In the Matter of:
Perfect Painters and More, Inc.
EPA Docket No. TSCA-03-2018-0126

For Respondent:

7/9/18
Date

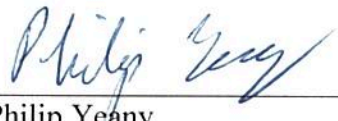


Michael Herzog

In the Matter of:
Perfect Painters and More, Inc.
EPA Docket No. TSCA-03-2018-0126

For Complainant:

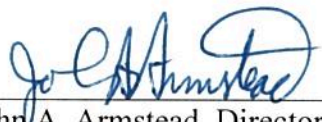
7/17/18
Date



Philip Yeany
Senior Assistant
Regional Counsel

Accordingly, I hereby recommend that the Regional Administrator, or his designee, the Regional Judicial Officer, issue the attached Final Order.

7.24.18
Date



John A. Armstead, Director
Land and Chemicals Division
U.S. EPA Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103

**BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III**

U.S. EPA-REGION 3-RHC
FILED-26JUL2018PM3:34

In the Matter of:	:	Consent Agreement and
	:	Final Order
Perfect Painters and More, Inc.	:	
4207 Kolb Avenue	:	U.S. EPA Docket Number
Baltimore, MD 21206,	:	TSCA-03-2018-0126
	:	
Respondent.	:	Proceeding under Sections 16(a) and
	:	409 of the Toxic Substances Control
	:	Act, 15 U.S.C. §§ 2615(a) and 2689

FINAL ORDER

Complainant, the Director, Land and Chemicals Division, U.S. Environmental Protection Agency, Region III, and Perfect Painters and More, Inc. (“Respondent”) have executed a document entitled “Consent Agreement” which I hereby ratify as a Consent Agreement in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/ Termination or Suspension of Permits, 40 C.F.R. Part 22. The terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated herein as if set forth at length.

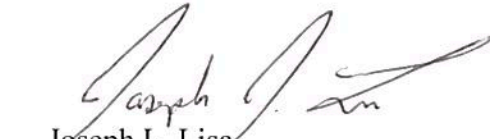
NOW, THEREFORE, PURSUANT TO 40 C.F.R. § 22.18(b)(3) and Sections 16(a) and 409 of the Toxic Substances Control Act (“TSCA”), 15 U.S.C. §§ 2615(a) and 2689, and having determined, based on the representations of the parties in the attached Consent Agreement, that the civil penalty agreed to therein is based upon a consideration of the factors set forth in Section 16(a)(2)(B) of TSCA, 15 U.S.C. § 2615(a)(2)(B), **IT IS HEREBY ORDERED** that Respondent pay a civil penalty of fifteen thousand one hundred and sixty

In the Matter of:
Perfect Painters and More, Inc.
EPA Docket No. TSCA-03-2018-0126

dollars and zero cents (\$15,160.00), as set forth in the Consent Agreement, and to comply with the terms and conditions of the Consent Agreement.

The effective date of the foregoing Consent Agreement and this FINAL ORDER is the date on which the Consent Agreement and this FINAL ORDER are filed with the EPA Regional Hearing Clerk.

Date: July 26, 2018



Joseph L. Lisa
Regional Judicial Officer
U.S. EPA, Region III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

In the Matter of:	:
	: EPA Docket No.
Perfect Painters and More, Inc.	: TSCA-03-2018-0126
4207 Kolb Avenue	:
Baltimore, MD 21206	: Proceeding under Section 16 of the
	: Toxic Substances Control Act, 15
Respondent.	: U.S.C. § 2615
	:
	:

CERTIFICATE OF SERVICE

I certify that on JUL 26 2018, the original and one (1) copy of the foregoing *Consent Agreement and Final Order*, were filed with the EPA Region III Regional Hearing Clerk. I further certify that on the date set forth below, I served a true and correct copy of the same to each of the following persons, in the manner specified below, at the following addresses:

Copy served via **Certified Mail, Return Receipt Requested, Postage Prepaid**, to:

Jack Ryan Terziu, Esq.
2211 Eastern Boulevard
Middle River, MD 21220
(Counsel for the Respondent)

Copy served via **Hand Delivery or Inter-Office Mail** to:

Philip Yeany
Senior Assistant
Regional Counsel
Office of Regional Counsel (3RC50)
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(Counsel for Complainant)

Dated: JUL 26 2018

Berlin Esposito

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region III

TRACKING NUMBER(S): 7002 2410 0005 1405 0076