



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC - 4 2019

REPLY TO THE ATTENTION OF

ECP-17J

VIA EMAIL

Mr. Clint Kayser
President
Miami Products and Chemical Company
520 Lonoke Avenue
Dayton, Ohio 45403

clintk@sanygen.net

Consent Agreement and Final Order
In the Matter of Miami Products and Chemical Company
doing business as K-O-K Products, Docket Number FIFRA-05-2020-0008

Mr. Kayser:

Enclosed please find a copy of a fully executed Consent Agreement and Final Order in resolution of the above case. This document was filed on December 4, 2019 with the Regional Hearing Clerk.

The civil penalty in the amount of \$11,095.20 is to be paid in the manner described in paragraphs 83 through 85. Please be certain that the docket number is included in the comment or description field of the electronic funds transfer. Payment is due by within 30 calendar days of the filing date.

Thank you for your cooperation in resolving this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Claudia Niess".

Claudia Niess
Pesticides and Toxics Compliance Section

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)	Docket No. FIFRA-05-2020-0008
)	
Miami Products and Chemical Company)	Proceeding to Assess a Civil Penalty
)	Under Section 14(a) of the Federal
Doing business as)	Insecticide, Fungicide, and Rodenticide
)	Act, 7 U.S.C. § 136l(a)
K-O-K Products,)	
Dayton, Ohio)	
)	
Respondent.)	
<hr/>		



Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 14(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. § 136l(a), and Sections 22.13(b) and 22.18(b)(2) and (3) of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (Consolidated Rules) as codified at 40 C.F.R. Part 22.

2. The Complainant is the Director of the Enforcement & Compliance Assurance Division, U.S. Environmental Protection Agency, Region 5.

3. The Respondent is Miami Products and Chemical Company d/b/a K-O-K Products (Miami Products), a corporation doing business in the State of Ohio.

4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO.

Statutory and Regulatory Background

9. Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), states that it is unlawful for any person in any state to distribute or sell to any person any pesticide which is misbranded.

10. Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A), states that a pesticide is misbranded if the labeling bears any statement, design, or graphic representation relative thereto or to its ingredients which is false or misleading in any particular.

11. Section 2(q)(2)(C)(iv) of FIFRA, 7 U.S.C. § 136(q)(2)(C)(iv), states that a pesticide is misbranded if there is not affixed to its container a label bearing the registration number assigned to the pesticide under FIFRA.

12. Section 2(q)(1)(F) of FIFRA, 7 U.S.C. § 136(q)(1)(F), states that a pesticide is misbranded if the label does not contain directions for use which are necessary for effecting the purpose for which the product is intended and if complied with, are adequate to protect health and the environment.

13. Section 2(q)(1)(G) of FIFRA, 7 U.S.C. § 136(q)(1)(G), states that a pesticide is misbranded if the label does not contain a warning or caution statement which may be necessary and if complied with, together with any requirements imposed under Section 3(d) of FIFRA,

7 U.S.C. § 136a(d), is adequate to protect health and the environment.

14. Section 25 of FIFRA, 7 U.S.C. § 136w, states that the Administrator is authorized to, among other things, prescribe regulations to carry out the provisions of FIFRA.

15. The Administrator promulgated such regulations, including those located at 40 C.F.R. Parts 152. See e.g., 49 Fed. Reg. 30903 (Aug. 1, 1984); 50 Fed. Reg. 16234, (April 25, 1985); 50 Fed. Reg. 41143, (Oct. 9, 1985); 53 Fed. Reg. 19114, (May 26, 1988); 54 Fed. Reg. 11923, (March 22, 1989).

16. The term “person” as defined at Section 2(s) of FIFRA, 7 U.S.C. § 136(s), means any individual, partnership, association, corporation, or any organized group of persons whether incorporated or not.

17. The term “registrant” as defined at Section 2(y) of FIFRA, 7 U.S.C. § 136(y), means a person who has registered any pesticide pursuant to the provisions of FIFRA.

18. The term “establishment” as defined at Section 2(dd) of FIFRA, 7 U.S.C. § 136(dd), means any place where a pesticide or device or active ingredient used in producing a pesticide is produced, or held, for distribution or sale.

19. The term “State” as defined in Section 2(aa) of FIFRA, 7 U.S.C. § 136(aa), means a State, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, the Trust Territory of the Pacific Islands, and American Samoa.

20. The term “distribute or sell” as defined in Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), means to distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, release for shipment, or receive and (having so received) deliver or offer to deliver.

21. A “pesticide” as defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u), is, among other things, any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest.

22. A “pest” as defined in Section 2(t) of FIFRA, 7 U.S.C. § 136(t), is any insect, rodent, nematode, fungus, weed, or any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism which the Administrator of EPA declares to be a pest under Section 25(c)(1) of FIFRA, 7 U.S.C. § 136w(c)(1).

23. A substance is considered to be intended for a pesticidal purpose, and thus to be a pesticide requiring registration, if the person who distributes or sells the substance claims, states, or implies (by labeling or otherwise) that the substance can or should be used as a pesticide. 40 C.F.R. § 152.15(a)(1).

24. Section 14(a)(1) of FIFRA, 7 U.S.C. § 136l(a)(1), states that any registrant, commercial applicator, wholesaler, dealer, retailer or other distributor who violates any provision of FIFRA may be assessed a civil penalty by EPA of not more than \$5,000 for each offense. The Federal Civil Penalties Inflation Adjustment Act of 1990, as amended through 2015, 28 U.S.C. § 2461, and its implementing regulations at 40 C.F.R. Part 19, increased the amount that can be assessed to \$19,936 for each offense occurring after November 2, 2015 and assessed after January 15, 2019. See 84 Fed. Reg. 2056 (February 6, 2019).

Factual Allegations and Alleged Violations

25. Respondent is a “person” as defined at Section 2(s) of FIFRA, 7 U.S.C. § 136(s), because Miami Products is a corporation.

26. Respondent is a “registrant” as defined at Section 2(y) of FIFRA, 7 U.S.C. § 136(y), because Miami Products registered pesticides, including K-O-K Bleach, EPA Registration

Number (Reg. No.) 278-65, and Sanamax Sodium Hypochlorite, EPA Reg. No. 278-66, pursuant to the provisions of FIFRA through a transfer of product registration on March 12, 2016. See 40 C.F.R. § 152.135.

27. Respondent is a “distributor” for purposes of Section 14(a)(1) of FIFRA, 7 U.S.C. § 136l(a)(1), because Miami Products distributed, sold, offered to sell, held for distribution, held for sale, held for shipment, or shipped pesticides, including K-O-K Bleach and Sanamax Sodium Hypochlorite.

28. At all times relevant to this CAFO, Respondent owned or operated a place of business located at 700 South 3 B’s and K Road, Galena, Ohio 43021 (the Galena establishment).

29. On or about February 21, 2017 inspectors employed by the Ohio Department of Agriculture (ODA) and duly authorized to conduct inspections under Sections 8 and 9 of FIFRA, 7 U.S.C. §§ 136(f)-(g), conducted an inspection at Respondent’s Galena establishment.

30. During the February 21, 2017 inspection, the ODA inspectors collected a copy of records of shipping, bin labels, and a statement regarding the labeling of K-O-K Bleach and Sanamax Sodium Hypochlorite.

31. On or about April 4, 2017, inspectors employed by the ODA and duly authorized to conduct inspections under Sections 8 and 9 of FIFRA, 7 U.S.C. §§ 136(f)-(g), conducted an inspection at Respondent’s Galena establishment.

32. During the April 4, 2017 inspection, the ODA inspectors collected a copy of the production records for K-O-K Bleach.

K-O-K Bleach, EPA Reg. No. 278-65

34. On or about December 3, 1963, EPA registered K-O-K Bleach, EPA Reg. No. 8154-1, under Section 3 of FIFRA, 7 U.S.C. § 136(a).

35. K-O-K Bleach, EPA Reg. No. 8154-1, is a “pesticide” as that term is defined by Section 2(u) of FIFRA because it is a mixture of substances intended for destroying pests, as defined by Section 2(t) of FIFRA, 7 U.S.C. § 136(t), including bacteria.

36. On or about November 15, 2010, EPA issued an accepted label notification (the November 15, 2010 notification) for K-O-K Bleach, EPA Reg. No. 8154-1.

37. EPA’s comments to the November 15, 2010 notification directed the First Aid section of the label of K-O-K Bleach, EPA Reg. No. 8154-1, to be revised as follows:

- a. “Revise the ‘If Swallowed’ section by adding the word ‘immediately’ preceding the statement ‘...for treatment advice.’”

38. On or about March 12, 2016, the registration of K-O-K Bleach, EPA Reg. No. 8154-1, was transferred to Respondent.

39. On or about March 12, 2016, K-O-K Bleach was assigned EPA Reg. No. 278-65 as part of its March 12, 2016 transfer.

40. During the February 21, 2017 inspection, the ODA inspectors photographed the K-O-K Bleach, lot number 0172017, present at the Galena establishment.

41. The K-O-K Bleach bin labels photographed during the February 21, 2017 inspection match the K-O-K Bleach bin label provided and collected during the inspection.

42. Based on the records of production provided by Respondent, Lot number 0172017 of K-O-K Bleach was produced at Respondent’s Galena establishment on January 17, 2017.

43. The K-O-K Bleach bin label collected during the February 21, 2017 inspection identified the product's registration number to be "EPA Reg. No. 8151-4."

44. The K-O-K Bleach bin label collected during the February 21, 2017 inspection did not contain the revision to the First Aid statement required by the November 15, 2010 accepted label notification.

45. On or about February 21, 2017, as defined by Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), Respondent distributed or sold K-O-K Bleach by holding K-O-K Bleach for distribution, sale, or shipment at the Galena establishment.

46. On February 21, 2017, Respondent distributed or sold K-O-K Bleach that did not bear the correct registration number of 278-65.

47. On February 21, 2017, Respondent distributed or sold K-O-K Bleach that did not contain the revision to the First Aid statement required by the November 15, 2010 accepted label notification.

48. On February 21, 2017, Respondent distributed or sold K-O-K Bleach that was misbranded as that term is defined by Section 2(q)(1)(A) and 2(q)(2)(C)(iv) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (2)(C)(iv).

49. On February 21, 2017, Respondent distributed or sold K-O-K Bleach that was misbranded as that term is defined by Section 2(q)(1)(G) of FIFRA, 7 U.S.C. § 136(q)(1)(G).

50. Respondent's distribution or sale of misbranded K-O-K Bleach on or about February 21, 2017 constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

The February 1, 2017 Distribution

51. Respondent certified in a signed statement that the bin label collected during the February 21, 2017 inspection is a true and accurate representation of the labels affixed to K-O-K Bleach distributed or sold on February 1, 2017 to Janton Company located at 3636 Lacon Road, Hilliard, Ohio 43026.

52. On February 1, 2017, Respondent distributed or sold K-O-K Bleach to Janton Company that did not bear the correct registration number of 278-65.

53. On February 1, 2017, Respondent distributed or sold K-O-K Bleach to Janton Company that did not contain the revision to the First Aid statement required by the November 15, 2010 accepted label notification.

54. On February 1, 2017, Respondent distributed or sold K-O-K Bleach that was misbranded as that term is defined by Section 2(q)(1)(A) and 2(q)(2)(C)(iv) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (2)(C)(iv).

55. On February 1, 2017, Respondent distributed or sold K-O-K Bleach that was misbranded as that term is defined by Section 2(q)(1)(G) of FIFRA, 7 U.S.C. § 136(q)(1)(G).

56. Respondent's distribution or sale of misbranded K-O-K Bleach on or about February 1, 2017 constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

Sanamax Sodium Hypochlorite Bleach, EPA Reg. No. 278-66

57. On or about May 21, 1980, EPA registered Sanamax Sodium Hypochlorite Solution, EPA Reg. No. 8154-6, under Section 3 of FIFRA, 7 U.S.C. § 136(a).

58. Sanamax Sodium Hypochlorite Solution is a “pesticide” as that term is defined by Section 2(u) of FIFRA because it is a mixture of substances intended for destroying pests, as defined in Section 2(t) of FIFRA, 7 U.S.C. § 136(t), including bacteria.

59. On or about January 20, 1988, EPA reregistered Sanamax Sodium Hypochlorite Solution, EPA Reg. No. 8154-6, under Section 3 of FIFRA, 7 U.S.C. § 136(a).

60. Sanamax Sodium Hypochlorite Solution, EPA Reg. No. 8154-6, was assigned EPA Reg. No. 8154-20001 as part of its January 20, 1988 reregistration.

61. On or about April 30, 2013, EPA accepted a label for Sanamax Sodium Hypochlorite Solution (the April 30, 2013 label).

62. The First Aid section of the April 30, 2013 label contained the following language:

- a. “If on skin or clothing:
Take off[f] contaminated Clothing
Rinse skin with plenty of water for 15-20 minutes.
Call a Poison Control Center or doctor for treatment advice.”
- b. “If swallowed:
Call a Poison Control Center or doctor immediately for treatment advice.
Have person drink large amounts of water.
Do not induce vomiting unless told to do so by the Poison Control Center or doctor.
Do not give anything by mouth to an unconscious person.”

63. The Precautionary Statements section of the April 30, 2013 label contained the following language:

- a. “DANGER: Corrosive causes severe skin and eye irritation or chemical burns to broken skin. [...]”

64. The Directions for Use section of the April 30, 2013 label contained the following language:

- a. "SPAS/HOT-TUBS: [...] During extended periods of disuse, add 3 fl. Oz. of this product daily per 1,000 gallons of water to maintain a 3 ppm chlorine concentration."

65. On or about March 12, 2016, the registration of Sanamax Sodium Hypochlorite Bleach, EPA Reg. No. 8154-20001, was transferred to Respondent.

66. On or about March 12, 2016, Sanamax Sodium Hypochlorite Bleach was assigned EPA Reg. No. 278-66 as part of its March 12, 2016 transfer.

67. The First Aid statement on the bin label collected during the February 21, 2017 inspection contained the following language:

- a. "If on skin or clothing:
Take off[f] contaminated Clothing
Rinse skin with plenty of water for 15-20 minutes."
- b. "If swallowed:
Call a Poison Control Center or doctor immediately for treatment advice.
Have person sip a glass of water if able to swallow.
Do not induce vomiting unless told to do so by the Poison Control Center or doctor.
Do not give anything by mouth to an unconscious person."

68. The Precautionary Statements section on the bin label collected during the February 21, 2017 inspection contained the following language:

- a. "DANGER: Corrosive, may cause skin and eye irritation or chemical burns to broken skin. [...]"

69. The Directions for Use section of the bin label collected during the February 21, 2017 inspection contained the following language:

- a. "SPAS/HOT-TUBS: [...] During extended periods of disuse, add 3 fl. Oz. of this product daily per 500 gallons of water to maintain a 3 ppm chlorine concentration."

70. The Sanamax Sodium Hypochlorite Bleach bin label collected during the February 21, 2017 inspection identified the product's registration number to be "EPA Reg. No. 8151-20001."

71. On or about February 21, 2017, as defined by Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), Respondent distributed or sold Sanamax Sodium Hypochlorite Bleach by holding Sanamax Sodium Hypochlorite Bleach for distribution, sale, or shipment at the Galena establishment.

72. On February 21, 2017, Respondent distributed or sold Sanamax Sodium Hypochlorite Bleach that did not bear the correct registration number of 278-66.

73. On February 21, 2017, Respondent distributed or sold Sanamax Sodium Hypochlorite Bleach that did not contain the First Aid statement required by the April 30, 2013 accepted label.

74. On February 21, 2017, Respondent distributed or sold Sanamax Sodium Hypochlorite Bleach that did not contain the Precautionary Statement required by the April 30, 2013 accepted label.

75. On February 21, 2017, Respondent distributed or sold Sanamax Sodium Hypochlorite Bleach that did not contain the Directions for Use required by the April 30, 2013 accepted label.

76. On February 21, 2017, Respondent distributed or sold K-O-K Bleach that was misbranded as that term is defined by Section 2(q)(1)(A) and 2(q)(2)(C)(iv) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (2)(C)(iv).

77. On February 21, 2017, Respondent distributed or sold K-O-K Bleach that was misbranded as that term is defined by Section 2(q)(1)(G) of FIFRA, 7 U.S.C. § 136(q)(1)(G).

78. On February 21, 2017, Respondent distributed or sold K-O-K Bleach that was misbranded as that term is defined by Section 2(q)(1)(F) of FIFRA, 7 U.S.C. § 136(q)(1)(F).

79. On February 21, 2017, Respondent distributed or sold K-O-K Bleach that was misbranded as that term is defined by Section 2(q)(1)(E) of FIFRA, 7 U.S.C. § 136(q)(1)(E).

80. Respondent's distribution or sale of misbranded Sanamax Sodium Hypochlorite Bleach, EPA Reg. No. 278-66, on or about February 21, 2017 constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

Civil Penalty

81. Based on an evaluation of the facts alleged in this CAFO, the factors in Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(a)(4), and EPA's Enforcement Response Policy for the Federal Insecticide, Fungicide, and Rodenticide Act, dated December 2009, Complainant has determined that the appropriate penalty to settle this action is \$11,095.20. In determining the penalty amount, Complainant considered the appropriateness of the penalty to the size of Respondent's business, the effect on Respondent's ability to continue in business, the gravity of the violation, and Respondent's cooperation and prompt return to compliance.

82. Within 30 days after the effective date of this CAFO, Respondent must pay a \$11,095.20 civil penalty for the alleged FIFRA violations.

83. Respondent may pay the penalty by electronic funds transfer, payable to the "Treasurer, United States of America," and sent to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
SWIFT address FRNYUS33
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read:
“D 68010727 Environmental Protection Agency”

In the comment or description field of the electronic funds transfer, state Miami Products, and the docket number of this CAFO.

84. Respondent may pay online by going to www.pay.gov, using the Search Public Forms option on the tool bar, entering SFO 1.1 in the search field, opening the form, and completing the required fields.

85. Respondent must send a notice of payment that states Miami Products and the docket number of this CAFO to EPA at the following addresses when it pays the penalty:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Claudia Niess (ECP-17J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Amanda Urban (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

86. Respondent may elect to pay the penalty in three separate payments as long as the penalty amount is paid in full within 30 days after the effective date of this CAFO.

87. This civil penalty is not deductible for federal tax purposes.

88. If Respondent does not pay the civil penalty in a timely manner, EPA may refer the matter to the Attorney General who will recover such amount by action in the appropriate United States district court under Section 14(a)(5) of FIFRA, 7 U.S.C. § 136l(a)(5). The validity, amount, and appropriateness of the civil penalty are not reviewable in a collection action.

89. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date payment was due at a rate established by the Secretary of the Treasury. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

90. The parties consent to service of this CAFO by e-mail at the following e-mail addresses: urban.amanda@epa.gov (for Complainant), and clintk@sanygen.net (for Respondent).

91. Respondent certifies that it is complying with FIFRA, 7 U.S.C. §§ 136 to 136y.

92. This CAFO resolves Respondent's liability for federal civil penalties for only the violations and facts alleged in this CAFO.

93. This CAFO does not affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

94. This CAFO does not affect Respondent's responsibility to comply with FIFRA and other applicable federal, state, and local laws.

95. This CAFO is a "final order" for purposes of EPA's Enforcement Response Policy for FIFRA.

96. The terms of this CAFO bind Respondent, its successors, and assigns.
97. Each person signing this agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.
98. Each party agrees to bear its own costs and attorney's fees, in this action.
99. This CAFO constitutes the entire agreement between the parties.

**In the Matter of:
Miami Products and Chemical Company**

Doing business as

**K-O-K Products,
Dayton, Ohio**

Miami Products and Chemical Company, Respondent

10-25-2019
Date

Clint Kayser, President
Clint Kayser, President
Miami Products and Chemical Company

**In the Matter of:
Miami Products and Chemical Company**

Doing business as

**K-O-K Products,
Dayton, Ohio**

United States Environmental Protection Agency, Complainant

11-19-19
Date

for Sara Brunema
Michael D. Harris, Director
Enforcement & Compliance Assurance Division

**In the Matter of:
Miami Products and Chemical Company**

Doing business as

**K-O-K Products,
Dayton, Ohio
Docket No. FIFRA-05-2020-0008**

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

12/3/19
Date

Ann L. Coyle
Ann L. Coyle
Regional Judicial Officer
United States Environmental Protection Agency
Region 5

**Consent Agreement and Final Order
In the Matter of:
Miami Products and Chemical Company**

**Doing business as
K-O-K Products,
Dayton, Ohio**

Docket Number: FIFRA-05-2020-0008

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing **Consent Agreement and Final Order**, docket number FIFRA-05-2020-0008, which was filed on December 4, 2019, in the following manner to the following addressees:

Copy by E-mail to
Attorney for Complainant:

Ms. Amanda Urban
urban.amanda@epa.gov

Copy by E-mail to
Respondent:

Mr. Clint Kayser
clintk@sanygen.net

Copy by E-mail to
Regional Judicial Officer:

Ann Coyle
coyle.ann@epa.gov

Dated:

December 4, 2019



LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5