

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

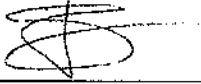
In the Matter of:)	
)	
Stephen Pearson d/b/a)	
Pearson Custom Homes)	Docket No.
30 Wayside Avenue)	TSCA-01-2018-0015
Byfield, MA 01922)	
Respondent.)	
)	
Proceeding under Section 16(a) of the)	
Toxic Substances Control Act,)	
15 U.S.C. § 2615(a))	
)	

MOTION FOR DEFAULT ORDER

The Complainant, the United States Environmental Protection Agency (“EPA”), moves for the issuance of an order under 40 C.F.R. §22.17, finding that Respondent, Stephen Pearson d/b/a Pearson Custom Homes, is in default in this matter, finding that Respondent violated Section 409 of the Toxic Substances Control Act, 15 U.S.C. § 2689 (“TSCA”), and the Residential Lead-Based Paint Hazard Reduction Act of 1992, 42 U.S.C. § 4851 *et seq.*, by failing to comply with Renovation, Repair and Painting Rule requirements of 40 C.F.R. Part 745, Subpart E (40 C.F.R. §§ 745.80 - 745.92), and assessing a penalty.

In support of its motion, EPA submits the attached Memorandum in Support of Motion for Default Order, with Exhibits 1, 2, 3(a), 3(b), 3(c), 3(d), 3(e), 3(f), 3(g), and 4, and a Proposed Default Order.

Respectfully submitted,



John Hultgren
Senior Enforcement Counsel

Date: March 12, 2019