

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)	Docket No. FIFRA-05-2025-0015
)	
Stepan Company)	Proceeding to Assess a Civil Penalty
Northbrook, Illinois)	Under Section 14(a) of the Federal
)	Insecticide, Fungicide, and Rodenticide
)	Act, 7 U.S.C. § 136l(a)
Respondent.)	
_____)	

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 and Compliance Assurance Division, U.S. Environmental Protection Agency (EPA), Region 5.
3. The Respondent is Stepan Company (Stepan), a corporation doing business in the State of Illinois.
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 Rights

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. Respondent waives any rights or defenses that Respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial. Respondent waives any right to challenge the lawfulness of the final order accompanying the consent agreement and waives its right to appeal the final order accompanying the consent agreement.

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

Statutory and Regulatory Background

10. Section 3(c)(1)(C) of FIFRA, 7 U.S.C. § 136a(c)(1)(C), states that each applicant for registration of a pesticide shall file with the Administrator a statement which includes a complete copy of the labeling of the pesticides, a statement of all claims to be made for it, and any directions for its use.

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

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

13. Section 2(q)(1)(F) of FIFRA, 7 U.S.C. § 136(q)(1)(F), defines a pesticide as “misbranded,” in pertinent part, if the labeling accompanying it does not contain directions for use which are necessary for effecting the purpose for which the product is intended.

14. 40 C.F.R. Part 152 sets forth the pesticide registration and classification procedures concerning registration of pesticide products under Section 3 of FIFRA.

15. 40 C.F.R. § 152.132 states that a registrant may distribute or sell his registered product under another person’s name and address instead of (or in addition to) his own. The product is referred to as a “distributor product.”

16. 40 C.F.R. § 152.132 states that supplemental distribution is permitted upon notification to the Agency if all of the following conditions are met: (a) The registrant has submitted to the Agency for each distributor product a statement signed by both the registrant and the distributor listing the names and addresses of the registrant and the distributor, the distributor’s company number, the additional brand name(s) to be used, and the registration number of the registered product, (b) The distributor product is produced, packaged and labeled in a registered establishment operated by the same producer who produces, packages, and labels the registered product, (c) The distributor product is not repackaged (remains in the producer’s unopened containers), (d) The label of the distributor product is the same as that of the registered product, except that the product name of the distributor product may be different, the name and address of the distributor may appear instead of that of the registrant, the registration number of the registered product must be followed by a dash, followed by the distributor’s company number, the establishment number must be that of the final establishment at which the product was produced, and specific claims may be deleted, provided that no other changes are necessary,

and (e) Voluntary cancellation of a product applies to the registered product and all distributor products distributed or sold under that registration number.

17. 40 C.F.R. § 152.132 states that a distributor is considered an agent of the registrant for all intents and purposes under FIFRA, and both the registrant and the distributor may be held liable for violations pertaining to the distributor product.

18. 40 C.F.R. § 156.10(a)(5) states a pesticide is misbranded if its labeling is false or misleading in any particular including both pesticidal and non-pesticidal claims. Examples include: “(ii) A false or misleading statement concerning the effectiveness of the product as a pesticide . . . (iv) A false or misleading comparison with other pesticides . . . (v) Any statement directly or indirectly implying the pesticide is recommended or endorsed by any agency of the Federal Government . . . (ix) Claims as to the safety of the pesticide or its ingredients, including statements such as ‘safe,’ ‘nonpoisonous,’ ‘harmless’ or ‘nontoxic to humans and pets’ with or without such a qualifying phrase as ‘when used as directed.’”

19. 40 C.F.R. § 156.10(a)(6) states that the final printed labeling must be submitted and accepted prior to registration.

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. The term “labeling,” as defined in Section 2(p) of FIFRA, 7 U.S.C. § 136(p), means all labels and all other written, printed, or graphic matter— (A) accompanying the pesticide or device at any time; or (B) to which reference is made on the label or in literature accompanying the pesticide or device except to current official publications of the

Environmental Protection Agency, the United States Departments of Agriculture and Interior, the Department of Health and Human Services, State experiment stations, State agricultural colleges, and other similar Federal or State institutions or agencies authorized by law to conduct research in the field of pesticides.

22. The term “person,” as defined in 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.

23. A “pest,” as defined in Section 2(t) of FIFRA, 7 U.S.C. § 136(t), means 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.

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

25. A “registrant,” as defined in Section 2(y) of FIFRA, § 136(y), means, a person who has registered any product pursuant to the provisions of FIFRA.

26. Section 14(a)(1) of FIFRA, 7 U.S.C. § 136(a)(1), and 40 C.F.R. Part 19, provides 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 up to \$24,885 for each offense where penalties are assessed on or after January 8, 2025.

Factual Allegations and Alleged Violations

27. Respondent is a “person” as defined at Section 2(s) of FIFRA because Stepan is a corporation.

28. Respondent is a "registrant" as defined at Section 2(y) of FIFRA.
29. At all times relevant to the CAFO, Respondent owned or operated a place of business located at 1101 Skokie Boulevard, Suite 500, Northbrook, Illinois 60062.
30. On or about April 23, 2007, Respondent registered its pesticide product, **Stepan Disinfectant Wipe** with EPA.
31. EPA assigned EPA Registration Number (EPA Reg. No.) 1839-190 to the pesticide product, **Stepan Disinfectant Wipe**.
32. On or about March 10, 2022, EPA approved an amended label for **Stepan Disinfectant Wipe**, EPA Reg. No. 1839-190, which superseded all previously accepted labels for the pesticide product (Accepted Label) and specified that the Respondent may only distribute or sell **Stepan Disinfectant Wipe**, EPA Reg. No. 1839-190, if it bears the Accepted Label.
33. On or about April 1, 2015, EPA approved a Notice of Supplemental Distribution of Registered Pesticide Product (Notice of Supplemental Distribution) for **Stepan Disinfectant Wipe**, EPA Reg. No. 1839-190.
34. The Notice of Supplemental Distribution listed the distributor of **Stepan Disinfectant Wipe**, EPA Reg. No. 1839-190, as Wipes, LLC, now located at 24059 W. 10 Mile Road, Southfield, Michigan 48033-3005.
35. The Notice of Supplemental Distribution listed the distributor product name for **Stepan Disinfectant Wipe**, EPA Reg. No. 1839-190, as **Wipes.Com Disinfectant Wipes**.
36. EPA assigned company number 86745 to Wipes, LLC.
37. The EPA Reg. No. for the distributor product, **Wipes.Com Disinfectant Wipes**, is 1839-190-86745.

38. **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745, is a “pesticide” as that term is defined in Section 2(u) of FIFRA.

39. Wipes, LLC, is an agent of the registrant, Respondent, for all intents and purposes under FIFRA with respect to its distributor product **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745.

40. On or about November 13, 2024, inspectors employed by EPA and authorized to conduct inspections under FIFRA conducted an inspection at Wipes LLC, located at 24059 W. 10 Mile Road, Southfield, Michigan.

41. During the inspection, the inspectors observed cartons of **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745, held in the warehouse in both four 800-count rolls and one 800-count roll in a bucket dispenser.

42. The inspectors inspected one case of the four 800-count rolls and observed that the outer box included the Wipes LLC website, Wipes.com, on it.

43. Each 800-count roll was sealed in a plastic bag and also included the Wipes LLC website, Wipes.com, on it.

44. The inspectors also inspected a case containing one 800-count roll in a bucket dispenser.

45. The outer case of the bucket dispenser and the actual bucket also included the Wipes LLC website, Wipes.com, on it.

46. During the inspection, the inspectors collected product labels and associated distribution and sales records for **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745.

47. The product labels collected during the inspection were true and accurate representations of the labels on the products that were released for distribution or sale from on or about October 13, 2024 through November 13, 2024.

48. At all times relevant to this CAFO, the language on the **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745, product labels (on all versions of the product), did not match the Accepted Label, as follows:¹

- a. The language “A potable water rinse is required for surfaces in direct contact with food” was not present on the product labels.
- b. When listing the varying micro-organisms the product is effective against, the product labels failed to include the applicable contact time for each micro-organism listed.
- c. When listing the varying virucide properties, the product labels included the incorrect contact times for listed micro-organisms.
- d. When listing special instructions for cleaning and decontaminating against HIV-1, HBV and BCV of surfaces/objects soiled with blood/body fluids, the product labels included the incorrect contact time.

49. At all times relevant to this CAFO, the language on the **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745, product labels for the bucket version also did not match the Accepted Label, as follows:²

¹ This is a non-exhaustive list of deviations from the Accepted Label.

² This is a non-exhaustive list of deviations from the Accepted Label.

- a. The product label claims that the product kills “SALMONELLA” and “FLU VIRUS” in 15 seconds. The Accepted Label lists the contact time for these micro-organisms as 2 minutes.
- b. The product label failed to include the required disclaimer language “When using on food contact surfaces: thoroughly rinse all treated surfaces with potable (tap) water” for the following use sites: Delicatessens; Catering Facilities and Banquet Halls.
- c. The product label failed to include required disclaimers which were identified in footnotes 3 and 7 of the approved label associated with the following language:
 “This product will clean and disinfect³ hard, non-porous surfaces ... appliance exteriors⁷ ... stove tops⁷.
³ When used according to disinfection directions ...
⁷ Allow surfaces to come to room temperature prior to treatment”
- d. The directions for use failed to include the following language for labels that list medical premises and metal and/or stainless-steel surfaces: “A potable water rinse is required for surfaces in direct contact with food.”

50. From on or about October 13, 2024 through November 13, 2024, the product labels for **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745, were misbranded under Section 2(q)(1)(F) of FIFRA.

51. At all times relevant to this CAFO, the following language appeared on the Wipes, LLC website, Wipes.com, regarding all versions of **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745:

- a. Stop relying on old school Clorox wipes. EPA-approved disinfectant wipes more effective for COVID-19 and today's cleaning protocols.

- b. Are EPA-registered disinfectant wipes safe to use on the skin?

The use of EPA-registered wipes for skin depends on the classification given to the product. The EPA registers products that are safe for human applications. [...]

The effectiveness of QACs is undeniable. According to one study, disinfectants containing QACs as their active ingredient can deactivate COVID-19 in as little as 15-30 seconds. No other EPA disinfectants kill COVID-19 as fast as QAC-powered products.

- c. Place your order for our EPA wipes, and we will get you your shipments faster than the competition.

- d. Reduce Sick Days – Sick days disrupt your business, causing economic strain.

Approximately 7.8 million Americans in January 2022 had an illness-related work absence. Cut those numbers in half by reducing spread of illnesses with EPA disinfectant wipes.

- e. What chemicals are included in EPA wipes?

You're getting quality, safety and efficacy when you purchase our wipes.

- f. Antibacterial wipes from Wipes.com are designed to reduce or eradicate bacteria from non-porous surfaces.

- g. Mitigate Disease Transmission – COVID-19 is not the only airborne or surface-borne source of illness. Using powerful disinfectant wipes is a proven way to save your members and staff from getting sick by eliminating sources of transmission.

- h. What chemicals are included in your gym wipes?

Wipes.com disposable gym wipes use the most potent and safe chemicals to eliminate and destroy bacteria and viruses by attacking their lipid envelopes and membranes. Quaternary ammonium compounds (QACs) are the active ingredient, working to eliminate and deactivate viruses and bacteria in seconds.

QACs are also proven to destroy COVID-19 lingering on gym surfaces.

- i. What's the difference between a sanitizing wipe and a disinfecting wipe?

Sanitizing products are designed to reduce the presence and concentration of bacteria on a surface. Disinfectants are used to eliminate bacteria and viruses on surfaces entirely. To put it simply, disinfectants are more powerful. Some products contain both sanitizing and disinfecting qualities, with bleach being the most common example.

52. From on or about October 13, 2024 through November 13, 2024, the labeling for **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745, was misbranded under Section 2(q)(1)(A) of FIFRA because the above language found on Wipes.com³ was false or misleading. See 40 C.F.R. § 156.10(a)(5)(ii), (iv), (v) and (ix).

53. From on or about October 13, 2024 through November 13, 2024, Wipes, LLC, an agent of the Respondent, distributed or sold **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745, to customers in the United States, on 303 separate occasions. See Attachment A, incorporated by reference as though fully set forth herein.

Counts 1 through 303

54. The preceding paragraphs are incorporated by reference.

³ This is a non-exhaustive list of false or misleading language found on Wipes.com.

55. From on or about October 13, 2024 through November 13, 2024, Wipes, LLC, an agent of Respondent, distributed or sold **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745, on 303 separate occasions that were misbranded as that term is defined by Section 2(q)(1)(A) and (F) of FIFRA, 7 U.S.C. § 136(q)(1)(A) and (F), and 40 C.F.R. § 156.10(a)(5)(ii), (iv), (v) and (ix).

56. Such distributions and sales of **Wipes.Com Disinfectant Wipes**, EPA Reg. No. 1839-190-86745, constitutes 303 separate unlawful acts pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

57. As an agent of the Respondent, Wipes, LLC's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects Respondent to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. § 136l(a), for each of the 303 violations.

Civil Penalty and Other Relief

58. Pursuant to Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(a)(4), Complainant has determined that an appropriate civil penalty to settle this action is \$1,126,404. In determining the penalty amount, Complainant considered the appropriateness of the penalty to the size of Respondent's business and the effect on Respondent's ability to continue in business. Complainant also considered EPA's FIFRA Enforcement Response Policy, dated December 2009.

59. Respondent agrees to pay a civil penalty in the amount of \$1,126,404 ("Assessed Penalty") within thirty (30) days after the effective date of this CAFO.

60. Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA

website: <https://www.epa.gov/financial/makepayment>. For additional instructions see:

<https://www.epa.gov/financial/additional-instructions-making-payments-epa>.

61. When making a payment, Respondent shall:

a. Identify every payment with Respondent's name and the docket number of this
CAFO, FIFRA-05-2025-0015.

b. Concurrently with any payment or within 24 hours of any payment, Respondent
shall serve proof of such payment to the following person(s):

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
r5hearingclerk@epa.gov

Claudia Niess (ECP-17J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
niess.claudia@epa.gov
and R5lecab@epa.gov

Nidhi O'Meara (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
omeara.nidhi@epa.gov

U.S. Environmental Protection Agency
Cincinnati Finance Center
Via electronic mail to: CINWD_AcctsReceivable@epa.gov

"Proof of payment" means, as applicable, a copy of the check, confirmation of
credit card or debit card payment, or confirmation of wire or automated
clearinghouse transfer, and any other information required to demonstrate that
payment has been made according to EPA requirements, in the amount due, and
identified with the appropriate docket number and Respondent's name.

62. Interest, Charges, and Penalties on Late Payments. Pursuant to 31 U.S.C. § 3717,
31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay any portion of the

Assessed Penalty, interest, or other charges and penalties per this CAFO, the entire unpaid balance of the Assessed Penalty and all accrued interest shall become immediately due and owing, and EPA is authorized to recover the following amounts.

- a. Interest. Interest begins to accrue from the effective date of this CAFO. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. To protect the interests of the United States the rate of interest is set at the IRS standard underpayment rate, any lower rate would fail to provide Respondent adequate incentive for timely payment.
- b. Handling Charges. Respondent will be assessed monthly a charge to cover EPA's costs of processing and handling overdue debts.
- c. Late Payment Penalty. A late payment penalty of six percent (6%) per annum, will be assessed monthly on all debts, including any portion of the Assessed Penalty, interest, penalties, and other charges, that remain delinquent more than ninety (90) days.

63. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this CAFO, EPA may take additional actions. Such actions EPA may take include, but are not limited to, the following.

- a. Refer the debt to a credit reporting agency or a collection agency pursuant to 40 C.F.R. §§ 13.13 and 13.14.

- b. Collect the debt by administrative offset (i.e., the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, 40 C.F.R. Part 13, Subparts C and H.
- c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with EPA or engaging in programs EPA sponsors or funds, 40 C.F.R. § 13.17.
- d. Request that the Attorney General bring a civil action in the appropriate district court to recover the amount outstanding pursuant to 7 U.S.C. § 1361(a)(5).

64. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.

65. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this CAFO shall not be deductible for purposes of federal taxes.

66. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, EPA is required to send to the Internal Revenue Service ("IRS") annually, a completed IRS Form 1098-F ("Fines, Penalties, and Other Amounts") with respect to any court order or settlement agreement (including administrative settlements), that require a payor to pay an aggregate amount that EPA reasonably believes will be equal to, or in excess of, \$50,000 for the payor's violation of any law or the investigation or inquiry into the payor's potential violation of any law, including amounts

paid for “restitution or remediation of property” or to come “into compliance with a law.” EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (i.e., a copy of IRS Form 1098-F). Failure to comply with providing IRS Form W-9 or Tax Identification Number (“TIN”), as described below, may subject Respondent to a penalty, per 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1. In order to provide EPA with sufficient information to enable it to fulfill these obligations, EPA herein requires, and Respondent herein agrees, that:

- a. Respondent shall complete an IRS Form W-9 (“Request for Taxpayer Identification Number and Certification”), which is available at <https://www.irs.gov/pub/irs-pdf/fw9.pdf>;
- b. Respondent shall therein certify that its completed IRS Form W-9 includes Respondent’s correct TIN or that Respondent has applied and is waiting for issuance of a TIN;
- c. Respondent shall email its completed Form W-9 to Milton Wise at EPA’s Cincinnati Finance Center at wise.milton@epa.gov, within 30 days after the effective date of this CAFO, and EPA recommends encrypting IRS Form W-9 email correspondence; and
- d. In the event that that Respondent has certified in its completed IRS Form W-9 that it does not yet have a TIN but has applied for a TIN, Respondent shall provide EPA’s Cincinnati Finance Center with Respondent’s TIN, via email, within five (5) days of Respondent’s receipt of a TIN issued by the IRS.

General Provisions

67. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: Nidhi O'Meara at omeara.nidhi@epa.gov (counsel for Complainant), and Russ Garrison at rgarrison@stepan.com (counsel for Respondent). Respondent understands that the CAFO will become publicly available upon filing.

68. The Respondent's full compliance with this CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in the CAFO.

69. 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.

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

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

72. The terms of this CAFO bind Respondent, its successors, and assigns.

73. 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.

74. Each party agrees to bear its own costs and attorney's fees, in this action.

75. This CAFO constitutes the entire agreement between the parties.

**In the Matter of:
Stepan Company**

May 28, 2025
Date

S. T. Moriarty
Sean Moriarty, Vice President & GM Global Surfactants
Stepan Company

**In the Matter of:
Stepan Company**

United States Environmental Protection Agency, Complainant

Date

Michael D. Harris
Director
Enforcement and Compliance Assurance Division

In the Matter of:
Stepan Company
Docket No. FIFRA-05-2025-0015

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.

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

In the Matter of:
Stepan Company
Docket No. FIFRA-05-2025-0015

Attachment A
Distributions/Sales Made through www.wipes.com

Attachment A
Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
1	10/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 102	Lockport	IL
2	10/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 111	Cranston	RI
3	10/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 148	Marion	VA
4	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 2	Grand Rapids	MI
5	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 5	Hailey	ID
6	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 14	San Antonio	TX
7	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 18	Houston	TX
8	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 33	New York	NY
9	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 63	Scandia	MN
10	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 64	Reno	NV
11	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 69	Brighton	MI
12	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 96	Palestine	TX
13	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 99	Springfield	MO
14	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 128	Amherst	NY
15	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 130	Kimball	SD
16	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 148	Marion	VA
17	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 149	New Caney	TX
18	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 150	Canton	TX
19	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 151	Portland	OR
20	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 184	McKinney	TX
21	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 221	Jacksonville	FL

Attachment A
Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
22	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 229	El Paso	TX
23	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 237	Mora	MN
24	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 238	The Village	OK
25	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 245	Windom	MN
26	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 249	Carroll	OH
27	10/14/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 261	Waxhaw	NC
28	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 6	San Diego	CA
29	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 56	Farmington	MI
30	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 66	St. Charles	MO
31	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 97	Hudson	OH
32	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 98	Rising Sun	PA
33	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 135	North East	MD
34	10/15/2024	800 Disinfecting Wipes in Bucket Dispenser	Customer 141	Paramount	CA
35	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 142	Northborough	MA
36	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 143	Eureka	MT
37	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 168	Merrillville	IN
38	10/15/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 205	Puyallup	WA
39	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 17	Plano	TX
40	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 26	Suwanee	GA
41	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 101	Plant City	FL
42	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 107	Hitchcock	TX

Attachment A
Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
43	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 159	New Albany	MS
44	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 165	Prescott Valley	AZ
45	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 172	Austin	TX
46	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 178	Telluride	CO
47	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 192	Jacksonville	FL
48	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 193	Albuquerque	NM
49	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 194	Southfield	MI
50	10/16/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 203	Paramus	NJ
51	10/17/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 15	Oakland Park	FL
52	10/17/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 22	Toledo	OH
53	10/17/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 48	Tampa	FL
54	10/17/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 108	Shavertown	PA
55	10/17/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 138	Philadelphia	PA
56	10/17/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 228	Staten Island	NY
57	10/17/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 239	Tulsa	OK
58	10/18/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 44	Wheaton	IL
59	10/18/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 71	Huntington	NY
60	10/18/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 166	Houston	TX
61	10/18/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 189	Fleming Island	FL
62	10/18/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 204	Lake Hopatcong	NJ
63	10/19/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 31	Crestview	FL

Attachment A
Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
64	10/19/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 136	Sylva	NC
65	10/19/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 208	Galena	OH
66	10/20/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 155	Buellton	CA
67	10/20/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 163	Killeen	TX
68	10/20/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 261	Waxhaw	NC
69	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 1	Doral	FL
70	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 12	Houston	TX
71	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 32	New York	NY
72	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 125	Marshall	MI
73	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 162	San Francisco	CA
74	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 182	Big Pine	CA
75	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 217	Cedar Rapids	IA
76	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 222	Bloomington	IN
77	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 240	Southfield	MI
78	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 241	Clearwater	FL
79	10/21/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 256	Irvine	CA
80	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 11	Norwalk	CA
81	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 30	Syosset	NY
82	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 42	Leland	NC
83	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 121	Kingwood	TX
84	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 137	Chapman	KS

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Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
85	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 145	Charleston	SC
86	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 147	Clarksville	TN
87	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 156	Rochester	MI
88	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 174	Swampscott	MA
89	10/22/2024	800 Disinfecting Wipes in Bucket Dispenser	Customer 186	Flushing	NY
90	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 252	Fort Lauderdale	FL
91	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 253	Jefferson City	MO
92	10/22/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 257	Glenwood	MD
93	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 29	Ft. Worth	TX
94	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 73	Ventura	CA
95	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 80	Owens Cross Roads	AL
96	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 85	Edmonds	WA
97	10/23/2024	800 Disinfecting Wipes in Bucket Dispenser	Customer 87	Chapin	SC
98	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 90	Bishop	CA
99	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 103	Noblesville	IN
100	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 214	Lake Oswego	OR
101	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 226	Springfield	MO
102	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 232	McAllen	TX
103	10/23/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 242	Schuylerville	NY
104	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 13	Elkhorn	WI
105	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 34	Wexford	PA

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	Order Date	Product	Customer Name [CBI REDACTED]	City	State
106	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 35	Cooper City	FL
107	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 50	St. Pete Beach	FL
108	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 54	Niceville	FL
109	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 67	Watertown	SD
110	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 82	Dexter	MI
111	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 89	Melville	NY
112	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 100	Springfield	NJ
113	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 128	Amherst	NY
114	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 187	Weston	OH
115	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 195	Miami	FL
116	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 197	SeaTac	WA
117	10/24/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 244	Frisco	TX
118	10/25/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 3	Joliet	IL
119	10/25/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 7	Marysville	WA
120	10/25/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 55	Sterling Heights	MI
121	10/25/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 188	San Diego	CA
122	10/25/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 196	Decatur	AL
123	10/25/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 234	Mansfield	TX
124	10/25/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 237	Mora	MN
125	10/26/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 212	Poquoson	VA
126	10/27/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 37	Paoli	PA

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Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
127	10/27/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 59	Bozeman	MT
128	10/27/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 93	Jamestown	NY
129	10/27/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 116	Minneapolis	MN
130	10/27/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 210	Farmington Hills	MI
131	10/27/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 233	Butte	MT
132	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 16	Dallas	TX
133	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 25	Atlanta	GA
134	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 38	Hampton	IA
135	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 46	Westfield	MA
136	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 96	Palestine	TX
137	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 111	Cranston	RI
138	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 127	Coral Springs	FL
139	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 152	Douglas	GA
140	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 201	New York	NY
141	10/28/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 206	Lancaster	CA
142	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 19	Anderson	SC
143	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 28	Vernon	CT
144	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 53	Oceanside	CA
145	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 58	Emmaus	PA
146	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 60	Madison	WI
147	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 112	Lakeland	FL

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	Order Date	Product	Customer Name [CBI REDACTED]	City	State
148	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 120	Plymouth Township	MI
149	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 161	Binghamton	NY
150	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 220	Bethlehem	PA
151	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 254	Puyallup	WA
152	10/29/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 255	Morrisville	NC
153	10/30/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 27	Keystone	CO
154	10/30/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 70	Denver	CO
155	10/30/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 72	San Diego	CA
156	10/30/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 115	Sherman Oaks	CA
157	10/30/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 159	New Albany	MS
158	10/30/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 178	Telluride	CO
159	10/30/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 193	Albuquerque	NM
160	10/30/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 227	Framingham	MA
161	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 24	Columbia	SC
162	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 43	Smyrna	GA
163	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 52	Canton	MI
164	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 64	Reno	NV
165	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 65	Missouri City	TX
166	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 75	Lakeland	FL
167	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 80	Owens Cross Roads	AL
168	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 84	East Longmeadow	MA

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Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
169	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 94	Smyrna	GA
170	10/31/2024	800 Disinfecting Wipes in Bucket Dispenser	Customer 109	Chapin	SC
171	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 121	Kingwood	TX
172	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 132	York	PA
173	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 144	Chestnut Hill	MA
174	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 164	Frisco	TX
175	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 169	Hayden	ID
176	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 185	Wilson	TX
177	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 211	West Bloomfield	MI
178	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 213	Marysville	CA
179	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 216	Huntsville	AL
180	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 236	McKinney	TX
181	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 247	San Leandro	CA
182	10/31/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 251	Colleyville	TX
183	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 36	Pleasant Hill	IA
184	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 45	Cumming	GA
185	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 57	Romeoville	IL
186	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 79	St. Augustine	FL
187	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 83	Lebanon	TN
188	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 88	Memphis	TN
189	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 118	Peoria	AZ

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Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
190	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 119	Quincy	IL
191	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 128	Amherst	NY
192	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 153	Boynton Beach	FL
193	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 158	Point Pleasant Boro	NJ
194	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 170	Lake Placid	FL
195	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 183	Vista	CA
196	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 189	Fleming Island	FL
197	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 248	North Highlands	CA
198	11/1/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 259	Sandy	UT
199	11/2/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 202	Charlotte	NC
200	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 32	New York	NY
201	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 78	York	PA
202	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 81	Chicago	IL
203	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 86	Yorba Linda	CA
204	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 91	Los Angeles	CA
205	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 92	Pueblo West	CO
206	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 122	Indianapolis	IN
207	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 123	Orlando	FL
208	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 129	Massena	NY
209	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 133	Florence	KY
210	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 135	North East	MD

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	Order Date	Product	Customer Name [CBI REDACTED]	City	State
211	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 140	Tampa	FL
212	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 146	Naples	FL
213	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 163	Killeen	TX
214	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 167	Kannapolis	NC
215	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 178	Telluride	CO
216	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 215	Pittsburgh	PA
217	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 224	Orlando	FL
218	11/4/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 245	Windom	MN
219	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 22	Toledo	OH
220	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 47	Dauphin	PA
221	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 68	Arlington	VA
222	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 124	Worcester	MA
223	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 154	Middletown	OH
224	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 160	Riverton	UT
225	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 162	San Francisco	CA
226	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 181	Chicago	IL
227	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 190	Perry	FL
228	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 219	St. Charles	MO
229	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 225	Montvale	NJ
230	11/5/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 235	Shawnee	KS
231	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 21	Whispering Pines	NC

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	Order Date	Product	Customer Name [CBI REDACTED]	City	State
232	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 39	Nixa	MO
233	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 42	Leland	NC
234	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 114	North Richland Hills	TX
235	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 131	Chicago	IL
236	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 147	Clarksville	TN
237	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 157	Lufkin	TX
238	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 198	Charlotte	NC
239	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 209	Winslow	AZ
240	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 218	Fort Worth	TX
241	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 246	Bloomfield	IA
242	11/6/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 250	Farmington Hills	MI
243	11/7/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 8	Mebane	NC
244	11/7/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 17	Plano	TX
245	11/7/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 22	Toledo	OH
246	11/7/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 113	Tampa	FL
247	11/7/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 126	Philadelphia	PA
248	11/7/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 139	Tallahassee	FL
249	11/7/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 143	Eureka	MT
250	11/7/2024	800 Disinfecting Wipes in Bucket Dispenser	Customer 191	St. Louis	MO
251	11/7/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 199	Beebe	AR
252	11/7/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 243	Houston	TX

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	Order Date	Product	Customer Name [CBI REDACTED]	City	State
253	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 20	The Woodlands	TX
254	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 49	Miami Springs	FL
255	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 51	Prairie du Chien	WI
256	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 54	Niceville	FL
257	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 61	New Braunfels	TX
258	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 76	Northampton	MA
259	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 88	Memphis	TN
260	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 128	Amherst	NY
261	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 134	Escondido	CA
262	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 171	Portland	OR
263	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 207	Spring Hill	FL
264	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 223	Dublin	OH
265	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 229	El Paso	TX
266	11/8/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 259	Sandy	UT
267	11/9/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 180	El Paso	TX
268	11/9/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 231	Coral springs	FL
269	11/10/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 23	Trenton	MI
270	11/10/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 117	Modesto	CA
271	11/10/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 175	Avon	OH
272	11/10/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 237	Mora	MN
273	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 9	North Andover	MA

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Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
274	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 10	La Grange Park	IL
275	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 31	Crestview	FL
276	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 40	Dallas	TX
277	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 61	New Braunfels	TX
278	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 95	Niceville	FL
279	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 105	Olathe	KS
280	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 111	Cranston	RI
281	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 176	Timnath	CO
282	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 177	Bedford	NH
283	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 179	Iowa City	IA
284	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 182	Big Pine	CA
285	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 200	Bishop	CA
286	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 216	Huntsville	AL
287	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 229	El Paso	TX
288	11/11/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 260	New York	NY
289	11/12/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 62	Ventura	CA
290	11/12/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 96	Palestine	TX
291	11/12/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 147	Clarksville	TN
292	11/12/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 173	Richmond	TX
293	11/12/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 230	Mankato	MN
294	11/12/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 262	Jupiter	FL

Attachment A
Distributions/Sales Made through www.wipes.com

	Order Date	Product	Customer Name [CBI REDACTED]	City	State
295	11/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 4	Lake Zurich	IL
296	11/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 41	Round Rock	TX
297	11/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 74	Roswell	GA
298	11/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 77	Highland	MI
299	11/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 104	Seattle	WA
300	11/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 106	Chicago	IL
301	11/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 110	San Mateo	CA
302	11/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 156	Rochester	MI
303	11/13/2024	Case 4 Rolls 800 Count Disinfectant Wipes	Customer 258	Las Vegas	NV