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BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

HEARINGS CLERK
EPA -- REGION 10

In the Matter of:

ESSENTIAL OIL RESEARCH FARM, LLC,
d/b/a YOUNG LIVING LAVENDER FARMS

St. Maries, Idaho

Respondent.

DOCKET NO. SDWA-10-2015-0021

**RESPONDENT'S RESPONSE TO
ORDER TO SHOW CAUSE AND
STIPULATION TO EXTENSION OF
TIME AND TO AMENDMENT OF
CONSENT AGREEMENT AND FINAL
ORDER**

**RESPONDENT DOES NOT OBJECT TO
EPA'S RESPONSE TO ORDER TO SHOW CAUSE**

On December 31, 2014, the Regional Judicial Officer for the United States Environmental Protection Agency, Region 10 ("EPA"), issued an "Order to Show Cause" ("Order") requiring EPA to explain how the proposed Consent Agreement and Final Order ("CAFO") submitted by EPA is consistent with the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation / Termination or Suspension of Permits* ("Consolidated Rules").

Respondent Essential Oil Research Farm, LLC, d/b/a Young Living Lavender Farms ("Young Living"), has reviewed EPA's Response to Order to Show Cause (the "Response"). Based on that review, Young Living does not object to the EPA's statements in the Response concerning consistency of the CAFO with the Consolidated Rules.

**RESPONDENT'S STIPULATION TO EXTENSION OF TIME,
AMENDMENT TO THE CONSENT AGREEMENT AND FINAL ORDER,
AND ADDITIONAL PUBLIC COMMENT PERIOD**

Based on its review of the Response:

(a) Young Living consents to the EPA's proposed postponement in the proceedings of 60 days in order to allow EPA to publish a correction to the public notice to state the amount of the agreed penalty as "up to a total amount of \$27,440." Young Living does not object to the simultaneous correction of the cited sections of the Safe Drinking Water Act, as described in the Response.

(b) Young Living further consents to amend the proposed CAFO to add a new subparagraph after subparagraph 5.17.5, which would require Young Living to provide analytic results from the end-sample taken pursuant to subparagraph 5.17.3 and received pursuant to Section 5.17.5 to EPA no later than twenty (20) weeks after the date the Final Order becomes effective.

Young Living's counsel may be contacted by phone at (208) 342-5000, by email at ljones@hollandhart.com, or by mail at Linda B. Jones, Holland & Hart LLP, 800 W. Main Street, Suite 1750, Boise, Idaho 83702.

Respectfully submitted this 30th day of January, 2015.

HOLLAND & HART LLP



Linda B. Jones
Counsel for Respondent