

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

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| <b>In the Matter of:</b>                           | ) | <b>Docket No. TSCA-05-2024-0005</b>       |
|  | ) |   |
| <b>Paris Services LLC d/b/a Paris Painting LLC</b> | ) | <b>Proceeding to Assess a Civil</b>       |
| <b>Brooklyn Center, Minnesota,</b>                 | ) | <b>Penalty Under Section 16(a) of the</b> |
|  | ) | <b>Toxic Substances Control Act,</b>      |
| <b>Respondent.</b>                                 | ) | <b>15 U.S.C. § 2615(a)</b>                |
| _____  | ) |   |

**Consent Agreement and Final Order**  
**Preliminary Statement**

1. This is an administrative action commenced and concluded under Section 16(a) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2615(a), and Sections 22.1(a)(5), 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, by lawful delegation, the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency (EPA), Region 5.

3. Respondent is Paris Services LLC d/b/a Paris Painting LLC, with a place of business located at 3515 48<sup>th</sup> Avenue N, Brooklyn Center, Minnesota 55429.

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 terms of this CAFO, including the assessment of the civil penalty specified below.

**Jurisdiction and Waiver of Right to Hearing**

7. For the purpose of this proceeding, and as required by 40 C.F.R. § 22.18(b), Respondent:

- a. admits the jurisdictional allegations set forth in this CAFO;
- b. neither admits nor denies the specific factual allegations and legal conclusions set forth in this CAFO;
- c. consents to the civil penalty stated below;
- d. consents to the issuance of any specified compliance or corrective action order pursuant to this CAFO;
- e. consents to any condition specified in this CAFO;
- f. waives any right to contest the allegations in this CAFO, and;
- g. waives its right to appeal the Final Order.

**Statutory and Regulatory Background**

8. In promulgating the Residential Lead-Based Paint Hazard Reduction Act of 1992, Pub. L. No. 102-550, Oct. 28, 1992 (Title X), Congress found, among other things, that low-level lead poisoning was widespread among American children, afflicting as many as 3,000,000 children under age six (6); at low levels, lead poisoning in children causes intelligence quotient deficiencies, reading and learning disabilities, impaired hearing, reduced attention span, hyperactivity, and behavior problems; and the ingestion of household dust containing lead from deteriorating or abraded lead-based paint is the most common cause of lead poisoning in

children. A key component of the national strategy to reduce and eliminate the threat of childhood lead poisoning is to educate the public concerning the hazards and sources of lead-based paint poisoning and steps to reduce and eliminate such hazards. See 42 U.S.C. § 4851.

9. Section 1021 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 amended TSCA, 15 U.S.C. § 2601 *et seq.*, by adding Subchapter IV – Lead Exposure Reduction, 15 U.S.C. §§ 2681 through 2692.

10. Section 402(a) of TSCA, 15 U.S.C. § 2682, requires the Administrator of EPA to promulgate regulations to ensure that individuals engaged in lead-based paint activities are properly trained; that training programs are accredited; that contractors engaged in such activities are certified; and that such regulations contain standards for performing lead-based paint activities, taking into account reliability, effectiveness, and safety.

11. Section 402(c) of TSCA, 15 U.S.C. § 2682, requires the Administrator of EPA to promulgate guidelines for the conduct of renovation and remodeling activities to reduce the risk of exposure to lead in connection with renovation and remodeling of target housing and public buildings built before 1978, and commercial buildings, and to revise the regulations under Section 402(a) of TSCA to apply those regulations to renovation or remodeling activities in target housing, public buildings constructed before 1978, and commercial buildings that create lead-based paint hazards.

12. Section 407 of TSCA, 15 U.S.C. § 2687, requires the regulations promulgated by the Administrator of EPA under Subchapter IV to include such recordkeeping and reporting requirements as may be necessary to ensure the effective implementation of the TSCA Lead Exposure Reduction requirements, 15 U.S.C. §§ 2681 through 2692.

13. Section 11 of TSCA, 15 U.S.C. § 2610, provides EPA with authority to conduct inspections upon the presentation of appropriate credentials and written notice.

14. Under Section 409 of TSCA, 15 U.S.C. § 2689, it shall be unlawful for any person to fail or refuse to comply with any rule or order issued under Subchapter IV – Lead Exposure Reduction, 15 U.S.C. §§ 2681 through 2692. *See also* 40 C.F.R. § 745.87.

15. Under Section 15 of TSCA, 15 U.S.C. § 2614, it shall be unlawful for any person to fail or refuse to establish and maintain records, submit reports, notices, or other information, or permit access to or copying of records, as required by TSCA or a rule thereunder. *See also* 40 C.F.R. § 745.87.

16. Pursuant to Sections 402, 406, and 407 of TSCA, 15 U.S.C. §§ 2682, 2686, and 2687, EPA promulgated the residential property renovation regulations at 40 C.F.R. Part 745, Subpart E, prescribing procedures and requirements for: the accreditation of renovator training programs; certification of individuals and firms engaged in lead-based paint activities; work practice standards for renovation, repair and painting activities in target housing and child-occupied facilities; and recordkeeping to demonstrate compliance with work practice standards. *73 Fed. Reg.* 21691 (April 22, 2008).

17. 40 C.F.R. § 745.82(a) provides that Subpart E applies to all renovations performed in target housing and child-occupied facilities, with certain exceptions not relevant here.

18. 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. 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 this part (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; the removal of building components; weatherization projects; and interim controls that disturb painted surfaces.

19. 40 C.F.R. § 745.83 defines *renovator* to mean an individual who either performs or directs workers who perform renovations. A certified renovator is a renovator who has successfully completed a renovator course accredited by EPA or an EPA authorized State or Tribal Program.

20. 40 C.F.R. § 745.103 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.

21. 40 C.F.R. Part 745, Subpart E, Residential Property Renovation, applies to all renovations performed for compensation in target housing and child-occupied facilities, with exceptions not relevant here. 40 C.F.R. §§ 745.80, 745.82.

22. 40 C.F.R. § 745.85(a) requires that renovations must be performed by certified firms, in accordance with 40 C.F.R. § 745.89, using certified renovators in accordance with 40 C.F.R. § 745.90. 40 C.F.R. § 745.86(a) requires firms performing renovations to retain and, if requested, make available to EPA all records necessary to demonstrate compliance with 40 C.F.R. Part 745, Subpart E for a period of three years following completion of the renovation.

23. 40 C.F.R. § 745.86(b)(6) requires a firm to retain records that document compliance with the work practice standards in 40 C.F.R. § 745.85, including documentation that a certified renovator was assigned to the project, that the certified renovator provided on-the-job training for workers used on the project, that the certified renovator performed or directed workers who performed all of the tasks described in § 745.85(a), and that the certified renovator performed the post-renovation cleaning verification described in § 745.85(b).

24. 40 C.F.R. § 745.87(b) requires firms performing renovations to establish and maintain records and make them available or permit access to or copying of records.

25. 40 C.F.R. § 745.81(a)(2)(ii) requires that on or after April 22, 2010, no firm may perform, offer, or claim to perform renovations without certification from EPA under 40 C.F.R. § 45.789 in target housing or child occupied facilities, unless the renovation qualifies for one of the exceptions identified in 40 C.F.R. § 745.82(a).

26. Under 15 U.S.C. § 2689 and 40 C.F.R. § 745.87(a), failing to comply with any requirement of 40 C.F.R. Part 745, Subpart E, violates Section 409 of TSCA, 15 U.S.C. § 2689, which may subject 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).

27. Section 16(a) of TSCA, 15 U.S.C. § 2615(a), 40 C.F.R. § 745.87(d), and 40 C.F.R. Part 19, authorize the Administrator of EPA to assess a civil penalty of up to \$46,989 per violation for each day of violation of Sections 15 and 409 of TSCA that occurred after November 2, 2015, where penalties are assessed on or after January 6, 2023.

### General Allegations

28. Complainant incorporates paragraphs 1 through 27 of this CAFO as if set forth in this paragraph.

29. At all times relevant to this CAFO, Respondent was a *firm* as defined by 40 C.F.R. § 745.83.

30. On September 30, 2020, EPA issued to the Respondent via electronic mail a “Request for Information under 40 C.F.R. § 745.86” letter seeking, among other things, a copy of the renovator certification showing completion of an EPA accredited training course, a copy of the firm certification issued by EPA, copies of all contracts and/or agreements for renovation (contracts), copies of all acknowledgements of receipt of a pamphlet by the owners and occupants of residential housing and renovation records maintained as required by the Lead Renovation, Repair and Painting Rule (RRP). On December 3, 2020, EPA issued a follow-up letter via certified mail when it did not receive a response. Respondent received this communication and on January 1, 2021, responded to EPA.

31. On February 4, 2021, Respondent provided Complainant via electronic mail documents requested by the Complainant requested in the December 3, 2020 “Request for Information under 40 C.F.R. § 745.86” letter dated September 30, 2020.

32. On February 24, 2021, EPA issued to the Respondent a follow-up “Request for Information under 40 C.F.R. § 745.86” electronic mail seeking, among other things, the date of the renovations, age of occupants at the time of the renovation, name of on-site Renovator and Lead-Based Paint testing records.

33. On March 18, 2021, Respondent provided to Complainant via electronic mail the information requested in paragraph 32 above.

34. On October 25, 2013, Respondent was issued a firm certification (Certificate Number NAT-F117208-1) to conduct lead-based paint renovation, repair, and painting activities, which expired on November 8, 2018. It was not until 2021 that Respondent sought and was issued a firm recertification (Certificate Number NAT-F117208-2). The issuance date of the recertification is April 21, 2021.

35. Based on information provided to Complainant by Respondent and building-year information publicly available on the Hennepin County and Ramsey County property value assessment websites (accessed on February 16, 2021) the Respondent directed workers to perform for compensation, the following modifications of existing structures that resulted in disturbances of painted surfaces in the following residential housing built prior to 1978, as detailed in this Table:

| <b>Line No.</b> | <b>Residential Property Address</b>                | <b>Residence Type</b> | <b>Built Year</b> | <b>Contract Date</b> | <b>Contracted Work</b> |
|-----------------|--|-----------------------|-------------------|----------------------|------------------------|
| 1               | 5137 Ewing Ave. South, Minneapolis, MN 55410       | Single-Family         | 1953              | 9/14/2020            | Exterior Painting      |
| 2               | 1362 Blair Ave. St. Paul, MN 55104                 | Single-Family         | 1912              | 10/16/2020           | Exterior Painting      |
| 3               | 5020 Morgan Ave. South, Minneapolis, MN 55419      | Single-Family         | 1924              | 6/4/2020             | Exterior Painting      |
| 4               | 2045 Wisconsin Ave. North, Golden Valley, MN 55427 | Single-Family         | 1964              | 10/12/2020           | Exterior Painting      |
| 5               | 4223 Fremont Ave. North, Minneapolis, MN 55412     | Single-Family         | 1910              | 9/23/2020            | Exterior Painting      |
| 6               | 2624 Garfield Ave. Minneapolis, MN 55408           | Single-Family         | 1905              | 5/6/2020             | Exterior Painting      |
| 7               | 3309 40th Ave. South, Minneapolis, MN 55406        | Single-Family         | 1926              | Not Provided         | Exterior Painting      |

| Line No. | Residential Property Address                    | Residence Type | Built Year | Contract Date | Contracted Work   |
|----------|---|----------------|------------|---------------|-------------------|
| 8        | 4816 Washburn Ave. South, Minneapolis, MN 55410 | Single-Family  | 1925       | 4/30/2020     | Exterior Painting |
| 9        | 4140 13th Ave South, Minneapolis, MN 55407      | Single-Family  | 1951       | 9/8/2020      | Exterior Painting |
| 10       | 4704 16th Ave South, Minneapolis, MN 55407      | Single-Family  | 1923       | 6/17/2020     | Exterior Painting |
| 11       | 2401 Humboldt Ave South, Minneapolis, MN        | Single-Family  | 1902       | 5/4/2020      | Exterior Painting |
| 12       | 3225 47th Ave South, Minneapolis, MN 55406      | Single-Family  | 1920       | 9/11/2020     | Exterior Painting |
| 13       | 876 Osceola Ave, St. Paul, MN 55105             | Single-Family  | 1895       | 3/12/2020     | Exterior Painting |
| 14       | 1832 Englewood Ave, St. Paul, MN 55104          | Single-Family  | 1914       | 6/3/2020      | Exterior Painting |
| 15       | 534 Pelham Blvd, St. Paul, MN 55104             | Single-Family  | 1945       | 5/7/2020      | Exterior Painting |

36. At the fifteen (15) contracted renovations referenced in paragraph 35, Respondent performed or directed to perform modifications of the buildings' existing structures that resulted in disturbance of painted surfaces, and were therefore *renovations* as defined in 40 C.F.R. § 745.83.

37. The fifteen (15) renovations referenced in paragraph 35 were each performed at residential housing built prior to 1978, and therefore the residential housing was *target housing* as defined in 40 C.F.R. § 745.103.

38. Respondent either performed or directed workers to perform the renovations described in paragraph 35 and is therefore a renovator as defined at 40 C.F.R. § 745.83.

39. On December 16, 2021, Complainant issued to Respondent a Notice of Potential Violation for alleged violations, including those listed below.

**Count 1 – Failure to Obtain Firm Recertification**

40. Complainant incorporates paragraphs 1 through 39 of this CAFO as if set forth in this paragraph.

41. 40 C.F.R. § 745.89(b)(1)(iii) requires firms that perform, offer, or claim to perform renovations for compensation to stop renovations or dust sampling if it does not obtain recertification under 40 C.F.R. § 745.89(a).

42. Respondent was not certified as a firm, under 40 C.F.R. § 745.89, during each renovation described in paragraph 35 and did not qualify for an exemption under 40 C.F.R. § 745.82(a).

43. Respondent's performance of each renovation, as described in paragraph 35, without certification from EPA constitutes a violation of 40 C.F.R. § 745.81(a)(2)(ii), 40 C.F.R. § 745.87(a), and 15 U.S.C. § 2689.

**Counts 2 to 16 – Failure to Obtain Written Acknowledgement from Owners**

44. Complainant incorporates paragraphs 1 through 39 of this CAFO as if set forth in this paragraph.

45. Respondent performed contracted renovations at fifteen (15) locations of single-family residential housing as described in paragraph 35, but failed to obtain from each owner the written acknowledgement that the owners had received the pamphlet, or obtain a certificate of mailing at least seven days prior to the contracted renovations.

46. Respondent's failure to obtain from each of the owners of the fifteen (15) dwelling units described in paragraph 35, the written acknowledgement that the owners had received the pamphlet entitled "Renovate Right: Important Lead Hazard Information for Families Child Care

Providers, and Schools,” or obtain a certificate of mailing at least seven days prior to the contracted renovations constitutes a violation of 40 C.F.R. § 745.84(a)(1) and 15 U.S.C. § 2689.

**Counts 17 to 31 – Failure to Retain All Records Necessary to Demonstrate Compliance with 40 C.F.R. Part 745, Subpart E**

47. Complainant incorporates paragraphs 1 through 39 of this CAFO as if set forth in this paragraph.

48. In the fifteen (15) renovations described in paragraph 35, Respondent failed to establish and maintain all records necessary to demonstrate compliance with 40 C.F.R. Part 745, Subpart E for a period of three years following completion of each renovation.

49. In the fifteen (15) renovations described in paragraph 35, Respondent failed to establish and maintain the following records:

- a. Documentation of compliance with the work practice standards in 40 C.F.R. § 745.85,
- b. Documentation that a certified renovator was assigned to the project,
- c. Documentation that the certified renovator provided on-the-job training for workers used on the project,
- d. Documentation that the certified renovator performed or directed workers who performed all of the tasks described in 40 C.F.R. § 745.85(a), and
- e. Documentation that the certified renovator performed the post-renovation cleaning verification described in 40 C.F.R. § 745.85(b).

50. Respondent’s failure to establish and maintain all records necessary to demonstrate compliance with 40 C.F.R. Part 745, Subpart E for a period of three years following

the completion of all fifteen contracted renovations described in paragraph 35 constitutes fifteen (15) violations of 40 C.F.R. § 745.86(b)(6), 40 C.F.R. § 745.87(b), and 15 U.S.C. § 2689.

**Civil Penalty**

51. Pursuant to Section 16(a) of TSCA, 15 U.S.C. § 2615(a), Complainant determined that an appropriate civil penalty to settle this action is \$88,827. In determining the penalty amount, Complainant considered the nature, circumstances, extent and gravity of the violations alleged and, with respect to 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 factors as justice may require.

52. The civil penalty for the TSCA violations will be paid in four installments by sending a cashier's or certified check, payable to "Treasurer, United States of America," to:

U.S. Environmental Protection Agency  
Government Lockbox 979078  
3180 Rider Trail S.  
Earth City, MO 63045.

The check must state Respondent's name and the docket number of this CAFO.

53. Respondent must pay the \$88,827 civil penalty in four installments with interest as follows:

| Installment | Due Date                                | Payment Amount     | Principal   | Interest |
|-------------|---|--------------------|-------------|----------|
| 1           | 30 days from the effective date of CAFO | <b>\$22,206.75</b> | \$22,206.75 | \$0.00   |
| 2           | 60 days from the effective date of CAFO | <b>\$22,539.85</b> | \$22,206.75 | \$333.10 |

|       |  |                    |             |          |
|-------|--|--------------------|-------------|----------|
| 3     | 90 days from the effective date of CAFO  | <b>\$22,317.78</b> | \$22,206.75 | \$111.03 |
| 4     | 120 days from the effective date of CAFO | <b>\$22,262.27</b> | \$22,206.75 | \$55.52  |
| Total |  | <b>\$89,326.65</b> | \$88,827.00 | \$499.65 |

54. Respondent must send a notice of payment that states Respondent's name and the case docket number to EPA at the following addresses when it completes its final payment of the penalty:

Juliane Grange  
Regional Hearing Clerk (E-19J)  
U.S. EPA, Region 5  
[r5hearingclerk@epa.gov](mailto:r5hearingclerk@epa.gov)

Michael Todd (ECP-17J)  
Pesticides and Toxics Compliance Section  
U.S. EPA, Region 5  
[todd.michael@epa.gov](mailto:todd.michael@epa.gov)

Mark Koller (C-14J)  
Office of Regional Counsel  
U.S. EPA, Region 5  
[koller.mark@epa.gov](mailto:koller.mark@epa.gov)

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

56. If Respondent does not timely pay the civil penalty, EPA may refer this matter to the Attorney General, who will recover such amount, plus interest, in the appropriate district court of the United States under Section 16(a) of TSCA, 15 U.S.C. § 2615(a). Respondent acknowledges that the validity, amount, and appropriateness of the civil penalty are not reviewable in a collection action.

57. 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 the payment was due at a rate established pursuant to 31 U.S.C. § 3717. 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.

58. 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 EPA's Cincinnati Finance Center at [wise.milton@epa.gov](mailto:wise.milton@epa.gov), within 30 days after the Final Order ratifying this Agreement is filed, and EPA recommends encrypting IRS Form W-9 email correspondence; and
- d. In the event that Respondent has certified in its completed IRS Form W-9 that it has applied for a TIN and that TIN has not been issued to Respondent within 30 days after the Effective Date, then Respondent, using the same email address identified in the preceding sub-paragraph, shall further:
  - i. Notify EPA's Cincinnati Finance Center of this fact, via email, within 30 days after the Effective Date of this Order per paragraph 69; and
  - ii. Provide EPA's Cincinnati Finance Center with Respondent's TIN, via email, within five (5) days of Respondent's issuance and receipt of the TIN.

#### **General Provisions**

59. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: [koller.mark@epa.gov](mailto:koller.mark@epa.gov) (for Complainant), and [jason@paris-painting.com](mailto:jason@paris-painting.com) (for Respondent).

60. Respondent's full compliance with this CAFO shall only resolve Respondent's liability for federal civil penalties for the general allegations and violations alleged in the CAFO.

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

62. This CAFO does not affect Respondent's responsibility to comply with TSCA, the Residential Lead-Based Paint Hazard Reduction Act of 1992, the Residential Lead-Based Paint Disclosure Program, and other applicable federal, state, and local laws.

63. Respondent certifies that it is complying with TSCA and 40 C.F.R. Part 745.

64. This CAFO constitutes a "prior such violation" as that term is used in EPA's Interim Final Consolidated Enforcement Response and Penalty Policy for the Pre-Renovation Education Rule; Renovation, Repair and Painting Rule; and Lead-Based Paint Activities Rule to determine Respondent's "history of prior such violations" under Section 16(a)(2)(B) of TSCA, 15 U.S.C. § 2615(a)(2)(B).

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

66. 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.

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

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

69. The effective date of this CAFO is the date on which it is filed with the Regional Hearing Clerk.

**Consent Agreement and Final Order  
In the Matter of: Paris Services LLC d/b/a Paris Painting  
LLC Docket No.: TSCA-05-2024-0005**

**Paris Services LLC d/b/a Paris Painting LLC Respondent**

2024-01-26

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Date

*Jason Paris*

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Jason Paris  
Owner  
Paris Services LLC d/b/a Paris Painting LLC

**Consent Agreement and Final Order**  
**In the Matter of: Paris Services LLC d/b/a Paris Painting LLC**  
**Docket No.: TSCA-05-2024-0005**

**United States Environmental Protection Agency, Complainant**

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Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance Division

**Consent Agreement and Final Order**  
**In the Matter of: Paris Services LLC d/b/a Paris Painting**  
**LLC Docket No.: TSCA-05-2024-0005**

**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.

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