

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

BEFORE THE ADMINISTRATOR

IN THE MATTER OF:)	
)	
)	DOCKET NO. OPA 09-2018-0002
VSS International, Inc.,)	
)	Stipulation to Exclude Exhibits and Limit
)	Potential Penalties
Respondent.)	

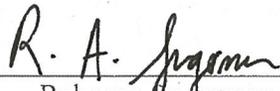
Complainant, U.S. EPA Region 9, and Respondent, VSS International, Inc. (“the Parties”), hereby agree and stipulate to the exclusion of exhibits for purposes of the above-entitled action. Without regard to objections at the time of hearing on any other exhibits, the Parties agree to exclude the following documents:

Exhibit No.	Brief Description
RX 25	Email from Andrew Helmlinger to Richard McNeil May 5, 2017 RE: VSS Emultech
RX 26	Email from Andrew Helmlinger to Richard McNeil May 5, 2017 RE: VSS Emultech
RX 27	Email from Andrew Helmlinger to Richard McNeil May11, 2017 RE: VSS Emultech
RX 28	Email from Andrew Helmlinger to Richard McNeil May11, 2017 RE: VSS Emultech
RX 30	Email from Richard McNeil to Andrew Helmlinger June 27, 2017 RE: VSSI Meeting at EPA - SF
RX 31	Email from Richard McNeil to Andrew Helmlinger July 18, 2017 RE: VSSI Meeting at EPA - SF

RX 33	Email from Andrew Helmlinger to Richard McNeil September 15, 2017 RE: September 25 - VSS International
RX 34	Email from Richard McNeil to Richard McNeil, forwarding email from Andrew Helmlinger September 18, 2017 Fwd: VSSI Emultech, meeting in July and information
RX 35	Email from Richard McNeil to Andrew Helmlinger September 21, 2017 Re: Sept. 25 – VSS International
RX 36	Email from Richard McNeil to Richard McNeil, forwarding email from Andrew Helmlinger October 9, 2017 Fwd: VSS Emultech
RX 44	Draft meeting notes, Office of the State Fire Marshal

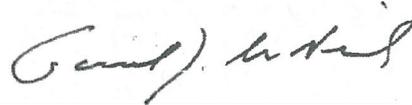
The Parties further agree that, for the purpose of determining a penalty after any finding of a violation respective to each of the five counts that Complainant has alleged in this matter, Complainant will not seek that any penalty be assessed for any day in violation prior to February 13, 2013.

Dated, this 15 day of March, 2019,



Rebecca Sugerman,
Assistant Regional Counsel,
U.S. EPA, Region IX

Dated, this 15th day of March, 2019,



Richard McNeil
Attorney for Respondent, VSS International

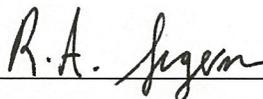
CERTIFICATE OF SERVICE

I, Rebecca Sugerman, hereby certify that on March 15, 2019, I caused to be filed electronically the foregoing Stipulation to Exclude Exhibits and Limit Potential Penalties with the Clerk of the Office of Administrative Law Judges using the OALJ E-Filing System, which sends a Notice of Electronic Filing to Respondent.

Additionally, I, Rebecca Sugerman, hereby certify that on March 15, 2019, I served a true and correct copy of the foregoing Stipulation to Exclude Exhibits and Limit Potential Penalties via electronic mail to Richard McNeil, attorney for Respondent, at RMcNeil@crowell.com.

Dated: March 15, 2019

Respectfully Submitted,

A handwritten signature in cursive script that reads "R.A. Sugerman". The signature is written in black ink and is positioned above a horizontal line.

Rebecca Sugerman
Assistant Regional Counsel,
U.S. EPA, Region IX

