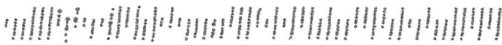


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Washington, DC 20460

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~~Brad Gooden  
Owner, Frontline Group LLC  
4510 Bridgeway Avenue  
Columbus, OH 43219~~

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UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR



In the Matter of: )  
 )  
Frontline Group LLC, ) Docket No. FIFRA-09-2023-0096  
 )  
Respondent. )

**PREHEARING ORDER**

As the parties have previously been notified, I am designated to preside over this proceeding. This proceeding is governed by the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, 40 C.F.R. §§ 22.1 to 22.45 (“Rules of Practice” or “Rules”). The parties are advised to familiarize themselves with the applicable statute(s), regulation(s), and Rules of Practice. Orders and decisions issued by the Administrative Law Judges are accessible on the website for the Office of Administrative Law Judges (“OALJ”) at [www.epa.gov/alj](http://www.epa.gov/alj).

**Settlement.** U.S. Environmental Protection Agency (“Agency” or “EPA”) policy encourages settlement of a proceeding without the necessity of a formal hearing, and the procedures regarding settlements are set forth in Section 22.18 of the Rules of Practice. See 40 C.F.R. § 22.18. The benefits of a negotiated settlement may far outweigh the uncertainty, time, and expense associated with a litigated proceeding. With these considerations in mind, the parties are directed to engage in a settlement conference on or before **May 3, 2024**, and attempt to reach an amicable resolution of this matter. Without mentioning any specific terms of settlement, Complainant shall file a Status Report regarding this conference and the status of settlement on or before **May 10, 2024**. If the case is settled, a fully-executed Consent Agreement and Final Order shall be filed with the Regional Hearing Clerk no later than **May 31, 2024**, and a courtesy copy shall be filed with the Headquarters Hearing Clerk.

In the event that a fully-executed Consent Agreement and Final Order is not filed on or before **May 31, 2024**, the parties must prepare for hearing and shall strictly comply with the following prehearing requirements of this Order. *The pendency of settlement negotiations or the existence of a settlement in principle does not constitute a basis for failing to strictly comply with those requirements. Only the filing with the Regional Hearing Clerk of a fully-executed Consent Agreement and Final Order, or an order of the undersigned, excuses noncompliance with filing deadlines.*

**Preliminary Statement.** No later than **May 10, 2024**, each party shall file with the Headquarters Hearing Clerk, serve on the opposing party, and serve on the undersigned a Preliminary Statement identifying (1) whether the party prefers for the hearing in this matter to