

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)	Docket No. TSCA-05-2025-0004
)	
All Point Construction, LLC)	Proceeding to Assess a Civil
Allen Park, Michigan,)	Penalty Under Section 16(a) of the
)	Toxic Substances Control Act,
Respondent.)	15 U.S.C. § 2615(a)
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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 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. Respondent is All Point Construction, LLC, a limited liability company with a place of business located at 7420 Allen Road, Allen Park, Michigan 48101.

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 Right to Hearing

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 in 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO.

9. By signing this consent agreement, 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, and waives any right to challenge the lawfulness of the final order accompanying the consent agreement.

Statutory and Regulatory Background

10. In promulgating the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X), Pub. L. 102-550, 106 Stat. 3897 (codified in scattered sections of 15 U.S.C. and 42 U.S.C.), Congress found, among other things, that low-level lead poisoning is widespread among American children, afflicting as many as 3,000,000 children under the age of 6; at low levels, lead poisoning in children causes intelligence 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.

11. 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.

12. 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.

13. 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.

14. 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 insure the effective implementation of the TSCA Lead Exposure Reduction requirements, 15 U.S.C. §§ 2681 through 2692.

15. 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.

16. 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.

17. Pursuant to Sections 402 and 406 of TSCA, 15 U.S.C. §§ 2682 and 2686, 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; 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).

18. 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.

19. 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.

20. 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 (e.g., modification of painted doors, surface restoration, window repair, surface preparation activity (such as sanding, scraping, or other such activities that may generate paint dust); the removal of building components (e.g., walls, ceiling, plumbing, windows); weatherization projects (e.g., cutting holes in painted surfaces to install blown-in

insulation or to gain access to attics, planing thresholds to install weather stripping), and interim controls that disturb painted surfaces.

21. 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.

22. 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.

23. 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.

24. 40 C.F.R. § 745.86(b)(6) requires a firm to document compliance with the work practice standards in 40 C.F.R. § 745.85 by retaining records to document that a certified renovator was assigned to the renovation project.

25. 40 C.F.R. § 745.86(b)(6) requires a firm to document compliance with the work practice standards in 40 C.F.R. § 745.85 by retaining records to document that a certified renovator performed or directed workers who performed all of the work practice standards described in 40 C.F.R. § 745.85(a).

26. 40 C.F.R. § 745.86(b)(6)(i) requires a firm to document compliance with the work practice standards in 40 C.F.R. § 745.85 by retaining records to document that the certified renovator performed on-the-job training for workers used on the renovation project.

27. 40 C.F.R. § 745.86(b)(6)(viii) requires a firm to document compliance with the work practice standards in 40 C.F.R. § 745.85 by retaining records to document that the certified renovator performed the post-cleaning verification described in 40 C.F.R. § 745.85(b).

28. 40 C.F.R. § 745.86(b)(6) requires a firm to document compliance with the work practice standards in 40 C.F.R. § 745.85 by retaining a copy of a certification from the certified renovator assigned to the project certifying the requirements in 40 C.F.R. § 745.86(b)(6)(i) through (viii) were completed.

29. Section 16(a) of TSCA, 42 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 were assessed on or after January 6, 2023, but before December 27, 2023.

Factual Allegations and Alleged Violations

30. At all times relevant to this Complaint, Respondent was a corporation with a place of business located at 7420 Allen Road, Allen Park, Michigan, and was therefore a *firm* as defined by 40 C.F.R. § 745.83.

31. The Federal Lead-Based Paint Program database shows Respondent was a certified renovation firm with the US EPA (NAT-F161226-1) from February 2, 2016 to February 16, 2021.

32. On April 7, 2022, EPA sent an information request letter (IRL) via certified mail to the Respondent's place of business located at 7420 Allen Road, Allen Park, Michigan, requesting Respondent's compliance with the residential property renovation requirements at 40 C.F.R. Part 745, Subpart E.

33. Based on information received from the IRL response, on 162 occasions from March 22, 2019 to May 2, 2022, Respondent performed or directed workers who performed interior and exterior renovations at the properties described in Appendix A.

34. The interior and exterior renovation that Respondent performed at the properties described in Appendix A were modifications of the buildings' existing structure that resulted in disturbance of painted surfaces, and were therefore *renovations* as defined in 40 C.F.R. § 745.83.

35. In the April 7, 2022 IRL, EPA requested all records for the renovations that Respondent had performed during the three years prior to the date of the inspection. Respondent provided contracts for the 162 renovations identified in Appendix A but did not provide any records necessary to demonstrate compliance with work practice standards in 40 C.F.R. § 745.85.

36. The buildings listed at the addresses in Appendix A are residential housing built prior to 1978, and therefore are *target housing* as defined in 40 C.F.R. § 745.103.

37. Respondent either performed or directed workers to perform the renovations described in Appendix A and is therefore a *renovator* as defined in 40 C.F.R. § 745.83.

Counts 1 - 132 – Failure to maintain records that a certified renovator was assigned

38. Complainant incorporates paragraphs 1 through 37 of this CAFO as if set forth in this paragraph.

39. 40 C.F.R. § 745.86(b)(6) requires the firm performing the renovation to maintain documentation that “a certified renovator was assigned to the project.”

40. For the renovations referenced in Appendix A, lines 1-125 and 127-134, Respondent did not maintain records that a certified renovator was assigned to the job.

41. For all the renovations referenced in Appendix A, lines 1-125 and 127-134, Respondent's failure to maintain records that a certified renovator was assigned to the job violated 40 C.F.R. § 745.86(b)(6) and 15 U.S.C. § 2689.

Counts 133 - 294 - Failure to maintain records that on-the-job training was provided

42. Complainant incorporates paragraphs 1 through 37 of this CAFO as if set forth in this paragraph.

43. 40 C.F.R. § 745.86(b)(6) requires the firm performing the renovation to maintain documentation that "on-the-job training was provided for workers used on the project."

44. For all the renovations referenced in Appendix A, Respondent did not maintain records that on-the-job training was provided for workers used on the project.

45. For all the renovations referenced in Appendix A, Respondent's failure to maintain records that on-the-job training was provided for workers used on the project violated 40 C.F.R. § 745.86(b)(6) and 15 U.S.C. § 2689.

Counts 295 - 426 - Failure to maintain records that the certified renovator performed or directed workers to perform the required work practice standards

46. Complainant incorporates paragraphs 1 through 37 of this CAFO as if set forth in this paragraph.

47. 40 C.F.R. § 745.86(b)(6) requires the firm performing the renovation to maintain documentation that "the certified renovator performed or directed workers who performed all of the tasks described in" 40 C.F.R. § 745.85(a).

48. For all the renovations referenced in Appendix A, lines 1-125 and 127-134, Respondent did not maintain records that the certified renovator performed or directed workers to perform the work practice standards.

49. For all the renovations referenced in Appendix A, lines 1-125 and 127-134, Respondent's failure to maintain records that the certified renovator performed or directed workers to perform the work practice standards required by 40 C.F.R. § 745.85(a) violated 40 C.F.R. § 745.86(b)(6) and 15 U.S.C. § 2689.

Counts 427 - 588 - Failure to maintain records that the certified renovator performed the post-renovation cleaning verification

50. Complainant incorporates paragraphs 1 through 37 of this CAFO as if set forth in this paragraph.

51. 40 C.F.R. § 745.86(b)(6) requires the firm performing the renovation to maintain documentation that "the certified renovator performed the post-renovation cleaning verification described in" 40 C.F.R. § 745.85(b).

52. For all the renovations referenced in Appendix A, Respondent did not maintain records that the certified renovator performed the post-renovation cleaning verification described in 40 C.F.R. § 745.85(b).

53. For all the renovations referenced in Appendix A, Respondent's failure to maintain records that the certified renovator performed the post-renovation cleaning verification described in 40 C.F.R. § 745.85(b) violated 40 C.F.R. § 745.86(b)(6) and 15 U.S.C. § 2689.

Counts 589 - 720 - Failure to maintain records of a certified renovator's training certificate

54. Complainant incorporates paragraphs 1 through 37 of this CAFO as if set forth in this paragraph.

55. 40 C.F.R. § 745.86(b)(6) requires the firm performing the renovation to maintain documentation including "a copy of the certified renovator's training certificate."

56. For all the renovations referenced in Appendix A, lines 1-125 and 127-134, Respondent did not maintain records that include a copy of the certified renovator's training certificate.

57. For all the renovations referenced in Appendix A, lines 1-125 and 127-134, Respondent's failure to maintain records that include a copy of the certified renovator's training certificate violated 40 C.F.R. § 745.86(b)(6) and 15 U.S.C. § 2689.

Counts 721 - 852 - Failure to maintain records of a certification by the certified renovator assigned to the project that the renovation job was completed in compliance with all the requirements

58. Complainant incorporates paragraphs 1 through 37 of this CAFO as if set forth in this paragraph.

59. 40 C.F.R. § 745.86(b)(6) requires the firm performing the renovation to maintain documentation of "a certification by the certified renovator assigned to the project" that the renovation job was completed in compliance with all the requirements listed in 40 C.F.R. § 745.86(b)(6)(i)-(viii).

60. For all the renovations referenced in Appendix A, lines 1-125 and 127-134, Respondent did not maintain documentation of compliance by the certified renovator certifying that the renovation job was completed in compliance with all the requirements listed in 40 C.F.R. § 745.86(b)(6)(i)-(viii).

61. For all the renovations referenced in Appendix A, lines 1-125 and 127-134, Respondent's failure to maintain records that documentation of compliance by the certified renovator certifying that the renovation job was completed in compliance with all the requirements listed in 40 C.F.R. § 745.86(b)(6)(i)-(viii) violated 40 C.F.R. § 745.86(b)(6) and 15 U.S.C. § 2689.

Count 853 - Failure to recertify firm

62. Complainant incorporates paragraphs 1 through 37 of this CAFO as if set forth in this paragraph.

63. 40 C.F.R. 745.89(b)(1)(iii) requires a firm that “fails to obtain recertification before the firm’s current certification expires” to “not perform renovations . . . until it is certified anew pursuant to” 40 C.F.R. § 745.89(a).

64. For all the renovations referenced in Appendix A, Respondent performed renovations without renewing its firm certification.

65. For all the renovations referenced in Appendix A, Respondent’s performance of renovations without renewing its firm certification violated 745.89(b)(1)(iii) and 15 U.S.C. § 2689.

Civil Penalty

66. 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 \$180,000. 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.

67. Respondent agrees to pay a civil penalty in the amount of \$180,000 (“Assessed Penalty”) within thirty (30) days after the date the Final Order ratifying this Agreement is filed with the Regional Hearing Clerk (“Filing Date”). EPA conducted an analysis of Respondent’s financial information and determined Respondent has a limited ability to pay. Consequently, in accordance with applicable law, EPA determined that the Assessed Penalty is an appropriate

amount to settle this action.

68. 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>.

69. When making a payment, Respondent shall:

a. Identify every payment with Respondent's name and the docket number of this Agreement, **TSCA-05-2025-0004**,

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
U.S. Environmental Protection Agency, Region 5
r5hearingclerk@epa.gov

Craig Meredith (ECP-17J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
meredith.craig@epa.gov
and
R5lecab@epa.gov

Robin L. Jacobs (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
jacobs.robin@epa.gov

U.S. Environmental Protection
Agency Cincinnati Finance Center
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.

70. Interest, Charges, and Penalties on Late Payments. Pursuant to 15 U.S.C. § 2615, 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 per this Agreement, 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 Filing Date. 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 large corporate 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. If Respondent fails to pay the Assessed Penalty in accordance with this Agreement, EPA will assess a charge to cover the costs of handling any unpaid amounts for the first thirty (30) day period after the Filing Date. Additional handling charges will be assessed each subsequent thirty (30) days, or any portion thereof,

until the unpaid portion of the Assessed Penalty, as well as any accrued interest, penalties, and other charges are paid in full.

- c. Late Payment Penalty. A late payment penalty of six percent (6%) per annum, will be assessed monthly on all debts, including any unpaid portion of the Assessed Penalty, interest, and other charges, that remain delinquent more than ninety (90) days.

71. 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 Agreement, EPA may take additional actions. Such actions may include, but are not limited to, the following.

- a. Refer the debt to a credit reporting agency or a collection agency, per 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. Per 15 U.S.C. § 2615(a), the Attorney General will bring a civil action in the appropriate district court to recover the full remaining balance of the debt

plus interest. In such an action, the validity, amount, and appropriateness of the Assessed Penalty shall not be subject to review.

72. 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 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.

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

General Provisions

74. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: jacobs.robin@epa.gov (for Complainant), and msteger@clarkhill.com (for Respondent). Respondent understands that the CAFO will become publicly available upon filing.

75. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in the CAFO.

76. 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.

77. This CAFO does not affect Respondent's responsibility to comply with TSCA, 15 U.S.C. § 2601 *et seq.*, its implementing regulations, and other applicable federal, state, and local laws.

78. Respondent certifies that it is complying with the residential property renovation regulations at 40 C.F.R. Part 745, Subpart E.

79. 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).

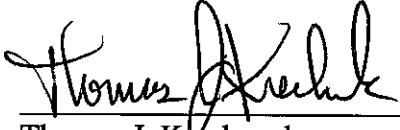
80. The terms of this CAFO bind Respondent, and its successors and assigns.

81. 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.

82. Each party agrees to bear its own costs and attorneys' fees in this action.

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

**Consent Agreement and Final Order
In the Matter of: All Point Construction, LLC, Respondent
Docket No.: TSCA-05-2025-0004**



Thomas J. Krechnyak
President
All Point Construction, LLC

9-27-2024

Date

**Consent Agreement and Final Order
In the Matter of: All Point Construction, LLC, Respondent
Docket No.: TSCA-05-2025-0004**

United States Environmental Protection Agency, Complainant

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Consent Agreement and Final Order
In the Matter of: All Point Construction, LLC, Respondent
Docket No.: TSCA-05-2025-0004

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

Appendix A - Renovation Work Performed at Target Housing

No.	Housing Address	Year Built	Contracted Work	Contract Date
1	14648 Michigan Allen Park, MI 48101	1964	Interior renovation	3/22/2019
2	15594 Bellaire Ave. Allen Park, MI 48101	1938	Interior renovation	Unknown
3	8065 Buckingham Allen Park, MI 48101	1953	Exterior renovation	4/10/2019
4	14885 Warwick Ave Allen Park, MI 48101	1949	Exterior renovation	4/17/2019
5	30803 Island Dr Gibraltar, MI 48173	1954	Interior renovation	4/23/2019
6	35010 Cherry Hill Westland, MI 48185	1933	Exterior renovation	4/23/2019
7	17059 Reno St Riverview, MI 48193	1950	Interior renovation	4/25/2019
8	15217 Hanover Ave Allen Park, MI 48101	1950	Interior renovation	4/25/2019
9	14327 Huntington Riverview, MI 48193	1963	Exterior renovation	4/29/2019
10	7156 Cortland Ave Allen Park, MI 48101	1929	Exterior renovation	5/11/2019
11	9671 Sterling Ave Allen Park, MI 48101	1952	Interior renovation	5/16/2019
12	9705 Sterling Allen Park, MI 48101	1952	Exterior renovation	5/30/2019
13	16787 Comstock St Livonia, MI 48154	1968	Exterior renovation	6/3/2019
14	11042 Katherine St Taylor, MI 48180	1965	Exterior renovation	6/6/2019
15	1763 N. Trenton Dr Trenton, MI 48183	1956	Exterior renovation	6/11/2019
16	9784 Sylvester St Taylor, MI 48180	1945	Interior renovation	6/11/2019
17	2278 9th St Wyandotte, MI 48192	1940	Exterior renovation	6/15/2019
18	15660 McCann St Southgate, MI 48195	1953	Exterior renovation	6/24/2019
19	1731 N. Franklin St Dearborn, MI 48128	1950	Exterior renovation	7/1/2019
20	15274 McLain Ave Allen Park, MI 48101	1942	Interior renovation	7/22/2019
21	2711-2717 Riverside Trenton, MI 48183 (Multi-unit dwelling)	1961	Exterior renovation	7/23/2019

No.	Housing Address	Year Built	Contracted Work	Contract Date
22	15327 Westlake Taylor, MI 48180	1967	Interior renovation	8/13/2019
23	6812 Luana Ave Allen Park, MI 48101	1947	Exterior renovation	8/15/2019
24	8316 Park Ave Allen Park, MI 48101	1956	Interior renovation	8/21/2019
25	764 Lincoln Lincoln Park, MI 48146	1946	Interior renovation	8/26/2019
26	8061 Robinson Ave Allen Park, MI 481011958	1952	Exterior renovation	8/27/2019
27	9390 Colorado St1950 Livonia, MI 48150	1958	Exterior renovation	Unknown
28	22585 W. Outer Dr Dearborn, MI 48124	1950	Exterior renovation	9/4/2019
29	44310 Harmony Ln Van Buren Charter Twp, MI 48111	1966	Exterior renovation	9/6/2019
30	15274 Hanfor Ave Allen Park, MI 48101	1960	Interior renovation	9/9/2019
31	16051 Euclid Ave Allen Park, MI 48101	1955	Exterior renovation	9/12/2019
32	15250 Buck Taylor, MI 48180	1946	Exterior renovation	9/17/2019
33	20395 Canal Dr Grosse Ile, MI 48138	1959	Exterior renovation	9/20/2019
34	7189 Elm St Taylor, MI 48180	1959	Interior renovation	Unknown
35	5635 Academy Dearborn Heights, MI 48125	1961	Exterior renovation	10/1/2019
36	5895 Balfour Ave Allen Park, MI 48101	1962	Exterior renovation	10/2/2019
37	25348 Filmore Taylor, MI 48180	1958	Interior renovation	9/28/2019, 10/12/2019, and 12/5/2019
38	9321 Niver Allen Park, MI 48101	1950	Interior renovation	10/31/2019
39	9376 Colorado Livonia, MI 48150	1958	Exterior renovation	10/15/2019
40	10787 Seavitt Allen Park, MI 48101	1964	Interior renovation	10/22/2019
41	1730 Waverly Trenton, MI 48183	1959	Exterior renovation	11/1/2019
42	9672 Seavitt Dr Allen Park, MI 48101	1954	Interior renovation	11/9/2019

No.	Housing Address	Year Built	Contracted Work	Contract Date
43	1995 Morrison Blvd Canton, MI 48187	1973	Exterior renovation	11/22/2019
44	7984 Hipp Taylor, MI 48180	1954	Exterior renovation	12/2/2019
45	15206 Belmont Allen Park, MI 48101	1947	Interior renovation	12/4/2019
46	13649 Wright Gibraltar, MI 48173	1940	Interior renovation	12/11/2019 and 2/7/2020
47	1573 Sheffield Dr Superior Charter Twp, MI 48198	1973	Exterior renovation	12/27/2019
48	14648 Michigan Blvd Allen Park, MI 48101	1964	Exterior renovation	1/2/2020
49	10936 Buckingham Ct Allen Park, MI 48101	1963	Interior renovation	1/8/2020 and 2/19/2020
50	9693 Quandt Allen Park, MI 48101	1951	Interior renovation	1/6/2020
51	8912 Niver Allen Park, MI 48101	1950	Interior renovation	1/10/2020
52	25600 Orchard Dr Dearborn Heights, MI 48125	1950	Interior renovation	1/14/2020
53	15255 Thomas Allen Park, MI 48101	1948	Interior renovation	1/24/2020
54	9002 Rackham St Taylor, MI 48180	1957	Exterior renovation	1/25/2020
55	12316 Fordline St Southgate, MI 48195	1968	Exterior renovation	1/30/20
56	2343 S. Trenton Dr. Trenton, MI 48183	1950	Exterior renovation	2/5/2020
57	951 2nd St. Wyandotte, MI 48192	1926	Interior renovation	2/11/2020
58	11116 Dudley Taylor, MI 48180	1969	Interior renovation	2/17/2020
59	6011 Arcola St Garden City, MI 48135	1954	Exterior renovation	3/2/2020
60	14100 Williamsburg Riverview, MI 48193	1967	Exterior renovation	3/3/2020
61	10858 Kolb Allen Park, MI 48101	1960	Interior renovation	3/6/2020
62	30025 Adams Gibraltar, MI 48173	1940	Exterior renovation	3/7/2020
63	15217 Hanover Ave Allen Park, MI 48101	1950	Exterior renovation	3/16/2020

No.	Housing Address	Year Built	Contracted Work	Contract Date
64	9901 Sterling Allen Park, MI 48101	1952	Exterior renovation	4/2/2020
65	7197 Osage Ave Allen Park, MI 48101	1952	Interior renovation	4/4/2020
66	8245 Rosedale Allen Park, MI 48101	1950	Interior renovation	5/19/2020
67	2703 Edsel Trenton, MI 48183	1950	Interior renovation	6/5/2020
68	9965 Laurence Allen Park, MI 48101	1954	Exterior renovation	6/23/2020
69	1604 New York Ave Lincoln Park, MI 48146	1941	Interior renovation	6/24/2020
70	934 New York Lincoln Park, MI 48146	1941	Interior renovation	6/26/2020
71	6788 Luana Allen Park, MI 48101	1950	Interior renovation	6/29/2020
72	22308 Goldenridge Taylor, MI 48180	1955	Interior renovation	5/21/2020
73	9419 Birch Taylor, MI 48180	1960	Interior renovation	5/24/2020
74	6518 King Allen Park, MI 48101	1948	Interior renovation	5/30/2020
75	14880 Markese Allen Park, MI 48101	1947	Exterior renovation	6/1/2020
76	14879 Brookline Riverview, MI 48193	1966	Exterior renovation	3/3/2020
77	24737 Pennie St Dearborn Heights, MI 48125	1957	Exterior renovation	6/1/2020
78	20513 Outer Dr Dearborn, MI 48124	1952	Interior renovation	6/4/2020
79	33486 Bock St Garden City, MI 48135	1954	Exterior renovation	6/4/2020
80	1705 14th Wyandotte, MI 48192	1945	Interior renovation	6/3/2020
81	6833 Bailey Taylor, MI 48180	1972	Interior renovation	6/9/2020
82	3440 Syckelmoore Trenton, MI 48183	1954	Interior renovation	6/10/2020
83	9291 Becker Allen Park, MI 48101	1956	Interior renovation	6/10/2020
84	14012 Kingswood Riverview, MI 48193	1973	Interior renovation	6/12/2020
85	14336 Blair Southgate, MI 48195	1936	Interior renovation	6/15/2020

No.	Housing Address	Year Built	Contracted Work	Contract Date
86	10885 Melbourne Ct Allen Park, MI 48101	1963	Interior renovation	6/19/2020
87	29162 East River Grosse Ile, MI 48138	1973	Interior renovation	7/1/2020
88	21279 Danbury St Woodhaven, MI 48183	1968	Interior renovation	7/1/2020
89	17063 Russell Allen Park, MI 48101	1953	Interior renovation	7/6/2020
90	762 Moran Ave Lincoln Park, MI 48146	1949	Interior renovation	7/17/2020
91	38570 Monmouth St Westland, MI 48186	1971	Interior renovation	6/30/2020
92	32676 Meadowlark Ct Farmington, MI 48336	1959	Exterior renovation	7/7/2020
93	1447 Emmons Blvd Lincoln Park, MI 48146	1950	Exterior renovation	7/10/2020
94	10097 Northway Ave Allen Park, MI 48101	1966	Exterior renovation	7/16/2020
95	15570 O Connor Ave Allen Park, MI 48101	1950	Exterior renovation	7/20/2020
96	31437 Brown Garden City, MI 48135	1941	Exterior renovation	7/22/2020
97	18800 Dale Allen Park, MI 48101	1954	Exterior renovation	3/15/2020
98	15801 McLain Allen Park, MI 48101	1946	Interior renovation	8/4/2020
99	8501 Louise Allen Park, MI 48101	1954	Interior renovation	8/17/2020
100	8290 Mortenview Taylor, MI 48180	1956	Interior renovation	8/17/2020
101	2003 Ardmore St Trenton, MI 48183	1965	Interior renovation	8/24/2020
102	970 Buckingham Lincoln Park, MI 48146	1951	Exterior renovation	8/25/2020
103	17828 Devonshire St Riverview, MI 48193	1967	Interior renovation	8/4/2020
104	9358 Ruth Ave Allen Park, MI 48101	1951	Exterior renovation	8/31/2020
105	14658 Keppen Allen Park, MI 48101	1944	Interior renovation	8/28/2020
106	11570 Phyllis St. Taylor, MI 48180	1965	Exterior renovation	9/2/2020
107	13654 Mark Southgate, MI 48195	1966	Interior renovation	9/23/2020

No.	Housing Address	Year Built	Contracted Work	Contract Date
108	25311 Madden St Taylor, MI 48180	1971	Interior renovation	9/30/2020
109	2554 Boxford Trenton, MI 48183	1954	Interior renovation	9/14/2020
110	11636 Klebba Taylor, MI 48180	1966	Interior renovation	9/28/2020
111	963 Leblanc Lincoln Park, MI 48146	1944	Interior renovation	10/1/2020
112	12849 Oakdale Southgate, MI 48195	1955	Interior renovation	10/6/2020
113	6776 Norwood Allen Park, MI 48101	1950	Interior/exterior renovation	10/14/2020
114	12246 Manor Dr Southgate, MI 48195	1970	Interior renovation	10/31/2020
115	13088 Helen Southgate, MI 48195	1954	Interior renovation	10/15/2020
116	7641 Monroe Taylor, MI 48180	1954	Interior renovation	10/13/2020
117	8005 Osage Allen Park, MI 48101	1951	Interior renovation	10/22/2020
118	7305 Birch Taylor, MI 48180	1958	Interior renovation	10/27/2020
119	14208 Huntington Riverview, MI 48193	1959	Exterior renovation	10/27/2020
120	26880 Ross Inkster, MI 48141	1950	Exterior renovation	11/3/2020
121	7326 Birch Taylor, MI 48180	1959	Interior renovation	12/10/2020
122	35141 Nancy Westland, MI 48186	1960	Interior renovation	10/21/2020
123	9683 Ruth Allen Park, MI 48101	1950	Interior renovation	1/28/2021
124	20500 W. Outer Dr Dearborn, MI 48124	1952	Exterior renovation	2/11/2021
125	26375 Mary Taylor, MI 48180	1973	Exterior renovation	6/21/2021
126	16732 Philomene Allen Park, MI 48101	1953	Exterior renovation	7/27/2021
127	14707 University Allen Park, MI 48101	1952	Exterior renovation	8/12/2021
128	7518 Hipp St Taylor, MI 48180	1942	Exterior renovation	8/26/2021
129	25906 Huron River Dr Flat Rock, MI 48134	1938	Exterior renovation	9/20/2021

No.	Housing Address	Year Built	Contracted Work	Contract Date
130	14147 Tall Oaks Riverview, MI 48193	1966	Exterior renovation	9/21/2021
131	10895 Becker Allen Park, MI 48101	1968	Exterior renovation	9/30/2021
132	14916 Dasher Allen Park, MI 48101	1946	Exterior	9/24/2021
133	17220 O'Conner Allen Park, MI 48101	1961	Interior/exterior renovation	12/12/2021
134	2711-2717 Riverside Trenton, MI 48183 (Multi-unit dwelling)	1961	Exterior renovation	7/23/2019
135	29658 Barkley St Livonia, MI 48154	1957	Exterior renovation	1/6/2022
136	6555 Ziegler Taylor, MI 48180	1939	Exterior renovation	1/25/2022
137	22961 Columbia Dearborn, MI 48124	1925	Exterior renovation	1/28/2022
138	15114 Cleveland Ave Allen Park, MI 48101	1965	Exterior renovation	12/7/2021
139	2155 Detroit Lincoln Park, MI 48146	1950	Exterior renovation	12/13/2021
140	15411 White Ave Allen Park, MI 48101	1930	Interior renovation	2/1/2022
141	29331 Tamarack Dr Flat Rock, MI 48134	1954	Interior renovation	2/2/2022
142	13359 Jobin St Southgate, MI 48195	1950	Exterior renovation	2/7/2022
143	23519 E. Fairway Dr Woodhaven, MI 48183	1968	Exterior renovation	2/8/2022
144	15544 Keppen Ave Allen Park, MI 48101	1950	Exterior renovation	2/23/2022
145	3030 Syracuse Dearborn, MI 48124	1950	Exterior renovation	2/25/2022
146	3302 Grange Rd Trenton, MI 48183	1959	Interior/exterior renovation	3/1/2022
147	8634 Becker Ave Allen Park, MI 48101	1950	Interior renovation	3/4/2022
148	12316 Irene St Southgate, MI 48195	1948	Exterior renovation	3/15/2022
149	616 Pine St Wyandotte, MI 48192	1901	Interior renovation	3/24/2022
150	15441 Regina Allen Park, MI 48101	1955	Interior renovation	3/8/2022
151	864 Pagel Ave	1951	Interior renovation	3/25/2022

No.	Housing Address	Year Built	Contracted Work	Contract Date
	Lincoln Park, MI 48146			
152	501 N. Waverly St Dearborn, MI 48128	1939	Exterior renovation	3/21/2022
153	13345 Netherwood St Southgate, MI j48195	1950	Exterior renovation	3/25/2022
154	9314 Niver Ave Allen Park, MI 48101	1953	Exterior renovation	4/4/2022
155	17505 Brody Allen Park, MI 48101	1952	Exterior renovation	4/4/2022
156	13364 Karl St Southgate, MI 48195	1965	Exterior renovation	4/5/2022
157	1167 21st St Wyandotte, MI 48192	1941	Interior renovation	4/6/2022
158	6739 Cortland Ave Allen Park, MI 48101	1958	Exterior renovation	4/12/2022
159	1627 Sheffield Dr Superior Charter Twp, MI 48198	1973	Exterior renovation	4/26/2022
160	880 Douglas St Garden City, MI 48135	1955	Interior renovation	4/4/2022
161	15255 O'Connor Ave Allen Park, MI 48101	1950	Interior renovation	5/2/2022
162	4523 5th St Ecorse, MI 48229	1918	Exterior renovation	4/14/2022