To: Kirk Shermer[Kirk@snowdenenterprises.com]
Cc: Janelle Kay[Janelle@PyxisRC.com]; Watanabe, Allison[Watanabe.Allison@epa.gov]
From: Alkon, Margaret
Sent: Thur 4/21/2016 12:17:23 AM
Subject: Snowden - EPA Civil Administrative Penalty Enforcement Case

Dear Mr. Shermer:

I am following up on our conversation of last week with two points to discuss.

First, have you mailed to me the financial information we discussed, to verify the size of business (gross revenue) of Snowden Enterprises? If so, please let me know when it was mailed so I can check with my mail room. If not, let me know if there is an issue with identifying or sending to me the relevant information.

Once I get that information, I will revise the penalty settlement document and send it to you for review and signature.

Second, we also want to discuss one more point regarding compliance with FIFRA: For section 7 reporting, Snowden should be reporting formulation when it appears that you have been reporting repackaging. We would like Snowden to correct its incomplete Section 7 reports within the next thirty days and prior to certifying compliance with FIFRA in the settlement document. As I am sure you will wonder if this involves an additional penalty, I am including a link to our penalty policy below but there is no penalty assessed for this type of minor incomplete reporting when a first time violator promptly corrects the error. See page 8 of EPA's Enforcement Response Policy for FIFRA Section 7(c).

https://www.epa.gov/enforcement/enforcement-response-policy-fifra-section-7c-establishment-reporting-requirements-may

Allison and I would be available for a short phone call Thursday April 21st at 11am or Tuesday April 26th at 10am. Let me know if either of those times works for you, or propose a different time if neither of those times works for you.

Sincerely,

Margaret Alkon

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Margaret Alkon

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