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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 6 DALLAS, TEXAS

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In the Matter of	§	
	§	
Mexican Products, LLC	§	Docket No. CAA-06-2025-3432
Laredo, Texas	§	
	§	
Respondent	§	

CONSENT AGREEMENT AND FINAL ORDER

A. PRELIMINARY STATEMENT

- 1. This is an administrative penalty assessment proceeding brought under the American Innovation and Manufacturing (AIM) Act of 2020, 42 U.S.C. § 7675, which governs the import of bulk hydrofluorocarbons (HFCs), under Section 113(d) of the Clean Air Act (the "Act" or CAA), 42 U.S.C. § 7413(d), which authorizes the Environmental Protection Agency (EPA) to bring administrative civil enforcement actions. Section 113(d) of the CAA, 42 U.S.C. § 7413(d), and Sections 22.13, 22.18, and 22.34 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permit ("Consolidated Rules"), as codified at 40 C.F.R. Part 22.
- 2. Complainant is the United States EPA, Region 6. On EPA's behalf, the Director of the Enforcement and Compliance Assurance Division, EPA Region 6, has been delegated the authority to settle civil administrative penalty and compliance proceedings under Section 113(d) of the Act, 42 U.S.C. § 7413(d).

- Mexican Products, LLC ("Mexican Products" or "Respondent") is a limited liability company doing business in the State of Texas. Respondent is a "person" as defined in Section 302(e) of the Act, 42 U.S.C. § 7602(e).
- 4. Complainant and Respondent, having agreed that settlement of this action is in the public interest, consent to the entry of this Consent Agreement along with the corresponding Final Order hereinafter known together as the "CAFO" without the adjudication of any issues of law or fact herein.
- Respondent consents to the assessment of the civil penalty specified in this CAFO
 and to the terms of this CAFO.

B. JURISDICTION

- 6. This CAFO is entered into under Section 113(d) of the CAA, as amended, 42 U.S.C. § 7413(d), and the Consolidated Rules, 40 C.F.R. Part 22. The alleged violations in this CAFO are pursuant to Section 113(a)(3)(A) of the Act, 42 U.S.C. § 7413(a)(3)(A).
- 7. EPA and the United States Department of Justice jointly determined that this matter, although it involves alleged violations that occurred more than 12 months before the initiation of this proceeding, is appropriate for an administrative penalty assessment. 42 U.S.C. § 7413(d); 40 C.F.R. § 19.4.
- 8. On February 13, 2023, EPA issued to Respondent a Denial letter, providing notice to Respondent that EPA found that Respondent committed the alleged violations described in Section E of this CAFO. On May 6, 2025, EPA provided a Notice Letter to Respondent with an opportunity to confer with EPA. On May 23, 2025, representatives of Respondent and EPA conferred regarding the May 6, 2025, Notice letter.

- 9. The Regional Judicial Officer is authorized to ratify this CAFO which memorializes a settlement between Complainant and Respondent. 40 C.F.R. §§ 22.4(b) and 22.18(b).
- The issuance of this CAFO simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).

C. STATUTORY AND REGULATORY BACKGROUND

American Innovation and Manufacturing Act

- 11. HFCs are potent greenhouse gases that accelerate climate change. The United States has committed, as a signatory of the Kigali Amendment to the Montreal Protocol, to reduce its production and consumption of HFCs by 85% in a stepwise manner by the year 2036.
- 12. The objective of the AIM Act, 42 U.S.C. § 7675, is to impose limits on HFC production and consumption.
- 13. The EPA is authorized to enforce the AIM Act, and any regulation promulgated thereunder pursuant to the federal enforcement authorities established by Section 113 of the CAA, 42 U.S.C. § 7413, as though the AIM Act was expressly included in Title VI of the CAA. 42 U.S.C. § 7675(k)(1)(C).
- 14. The regulations at 40 C.F.R. Part 84, Subpart A, implement the AIM Act requirement to phase down HFC production and consumption.
- 15. The regulations at 40 C.F.R. Part 84, Subpart A, apply to any person who imports a regulated substance. 40 C.F.R. § 84.1(b).
- 16. Pursuant to Sections 113(a) and (d) of the CAA, 42 U.S.C. §§ 7413(a) and (d), whenever the Administrator finds that such person has violated or is violating any requirement

or prohibition of 42 U.S.C. § 7675, and its implementing regulations, the Administrator may issue an administrative order and a civil administrative penalty.

Definitions

- 17. The regulations at 40 C.F.R. Part 84, Subpart A, contain the following definitions:
- a. An "application-specific allowance" is "a limited authorization granted in accordance with subsection (e)(4)(B)(iv) of the AIM Act for the production or import of a regulated substance for use in the specifically identified applications that are listed in that subsection and in accordance with the restrictions contained at § 84.5(c)." 40 C.F.R. § 84.3.
- b. "Bulk" is defined as a "regulated substance of any amount that is in a container for the transportation or storage of that substance such as cylinders, drums, ISO tanks, and small cans. A regulated substance that must first be transferred from a container to another container, vessel, or piece of equipment in order to realize its intended use is a bulk substance. A regulated substance contained in a manufactured product such as an appliance, an aerosol can, or a foam is not a bulk substance." 40 C.F.R. § 84.3.
- c. "Consumption allowances" are "a limited authorization to produce and import regulated substances; however, consumption allowances may be used to produce regulated substances only in conjunction with production allowances." 40 C.F.R. § 84.3.
- d. "Exchange value equivalent" (EVe) is defined as "the exchange valueweighted amount of a regulated substance obtained by multiplying the mass of a

regulated substance by the exchange value of that substance." 40 C.F.R. § 84.3.

- e. "Import" is defined as "to land on, bring into, or introduce into, or attempt to land on, bring into, or introduce into, any place subject to the jurisdiction of the United States, regardless of whether that landing, bringing, or introduction constitutes an importation within the meaning of the customs laws of the United States.

 Offloading used regulated substances recovered from equipment aboard a marine vessel, aircraft, or other aerospace vehicle during servicing is not considered an import."

 40 C.F.R. § 84.3.
- f. "Importer" is defined as: "[A]ny person who imports a regulated substance into the United States. 'Importer' includes the person primarily liable for the payment of any duties on the merchandise or an authorized agent acting on his or her behalf. The term also includes: (1) [t]he consignee; (2) [t]he importer of record; (3) [t]he actual owner; or (4) [t]he transferee, if the right to draw merchandise in a bonded warehouse has been transferred." 40 C.F.R. § 84.3.
- g. "Person" is defined as "any individual or legal entity, including an individual, corporation, partnership, association; state, municipality, political subdivision of a state, Indian tribe; any agency, department, or instrumentality of the United States; and any officer, agent, or employee thereof." 40 C.F.R. § 84.3.
- h. "Regulated substance" is defined as: "[A] hydrofluorocarbon listed in the table contained in subsection (c)(1) of the AIM Act and a substance included as a regulated substance by the Administrator under the authority granted in subsection (c)(3)." 40 C.F.R. § 84.3.

18. From January 1, 2022, to September 17, 2023, 40 C.F.R. § 84.5(b)(1) provided that "[n]o person may import bulk regulated substances, except by expending, at the time of the import, consumption or application-specific allowances in a quantity equal to the exchange-value weighted equivalent of the regulated substances imported."

A current list of regulated substances, their chemical formulas, and their exchange values can be found in Appendix A to 40 C.F.R. Part 84. See 40 C.F.R. § 84.3.

- The compound R-410A is regulated by the AIM Act and has an exchange value of
 2,088. 40 C.F.R. Part 84, Appendix A.
- 20. As of January 1, 2022, "each person meeting the definition of importer for a particular regulated substance import transaction is jointly and severally liable for a violation of paragraph (b)(1) of this section, unless they can demonstrate that another party who meets the definition of an importer met one of the exceptions set forth in paragraph (b)(1)." 40 C.F.R. § 84.5(b)(2) (2022).²
- 21. "Every kilogram of bulk regulated substances imported ... constitutes a separate violation of this subpart." 40 C.F.R. § 84.5(b)(6) (2022).

¹ Effective September 18, 2023, 40 C.F.R. § 84.5(b)(1) was revised to: "[n]o person may import bulk regulated substances, either as a single component or a multicomponent substance, except . . . [i]f the importer of record possesses at the time they are required to submit reports to EPA pursuant to § 84.31(c)(7), and expends at the time of ship berthing for vessel arrivals, border crossing for land arrivals such as trucks, rails, and autos, and first point of terminus in U.S. jurisdiction for arrivals via air, consumption or application-specific allowances in a quantity equal to the exchange-value weighted equivalent of the regulated substances imported, whether present as a single component or a multicomponent blend."

² The language of this provision was also amended in September 2023, with the current provision now located at 40 C.F.R. § 84.5(b)(3).

D. FINDINGS OF FACT AND CONCLUSIONS OF LAW

- 22. Respondent is, and at all times referred to herein was, a "person" as defined by Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
- Respondent is the owner and operator of an importer of goods and products
 located at 1007 Beverly Drive, Laredo, Texas 78045.
- On or about February 4, 2023, Respondent, imported approximately 1,085 kg of
 R-410A from Mexico under Customs Entry Number BJG-01431641 ("Subject HFCs").
 - 25. Respondent's Importer Number is 82-186235700.
 - 26. The Subject HFCs entered the United States at Port of Roma, Texas.
- 27. Five out of the ninety-six cylinders were subsequently tested at the National Enforcement Investigations Center (NEIC) in Denver, Colorado.
- 28. Sample results from NEIC testing confirmed the presence of difluoromethane (HFC-32) and pentafluoroethane (HFC-125). The refrigerant blend R-410A is composed of HFC-32 and HFC-125.
- The remaining Subject HFCs were held and subsequently destroyed by U.S.
 Customs and Border Protection (CBP) in Laredo, Texas.
- Respondent did not possess or expend any allowances when importing the
 Subject HFCs.
- 31. Using the formula provided by 40 C.F.R. § 84.3, the EPA calculated the total metric tons of exchange value equivalents ("MTEVe") of the Subject HFCs to be approximately 2,265.
 - 32. The Subject HFCs were transported in an ISO tank.

- 33. Respondent is an "importer," as that term is defined in 40 C.F.R. § 84.3.
- 34. The Subject HFCs are bulk regulated substances, as defined in 40 C.F.R. § 84.3.
- 35. Based upon the information provided, EPA determined that Respondent violated certain provisions of the AIM Act.

E. ALLEGED VIOLATIONS

- 36. The facts stated in EPA Findings of Fact and Conclusions of Law above are herein incorporated.
- 37. Complainant hereby states and alleges that Respondent has violated the CAA and federal regulations promulgated thereunder as stated below.

Claim 1 – Prohibitions Relating to Regulated Substances

- 38. The regulation at 40 C.F.R. § 84.5(b)(1) prohibits the import of bulk regulated substances, either as a single component or a multicomponent substance, except: [. . .].
- 39. Respondent, without expending allowances, imported approximately 2,088 total MTEVe HFC using the formula prescribed by 40 C.F.R. § 84.3. Respondent did not possess any allowances when importing these bulk HFCs.
- 40. Therefore, Respondent imported bulk regulated substances in violation of 40 C.F.R. § 84.5(b)(1).

F. CONSENT AGREEMENT AND CIVIL PENALTY

General

- 41. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:
 - admits the jurisdictional allegations set forth herein;

- b. neither admits nor denies the specific factual allegations stated herein;
- c. consents to the assessment of a civil penalty, as stated herein;
- d. consents to the issuance of any specified compliance or corrective action
 order;
 - e. consents to any conditions specified herein;
 - f. consents to any stated Permit Action;
 - g. waives any right to contest the allegations set forth herein; and
 - h. waives its rights to appeal the Final Order accompanying this CAFO.
- 42. For the purpose of this proceeding, Respondent:
- a. agrees that this CAFO states a claim upon which relief may be granted
 against Respondent;
- acknowledges that this CAFO constitutes an enforcement action for purposes of considering Respondent's compliance history in any subsequent enforcement action;
- c. waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this CAFO, including any right of judicial review under Section 307(b)(1) of the CAA, 42 U.S.C. § 7607(b)(1);
- d. consents to personal jurisdiction in any action to enforce this CAFO in the
 United States District Court for the Sothern District of Texas;
- e. waives any right it may possess at law or in equity to challenge the authority of EPA to bring a civil action in a United States District Court to compel

compliance with this CAFO and to seek an additional penalty for such noncompliance, and agrees that federal law shall govern in any such civil action;

- f. consents to the issuance of this CAFO and consents for the purposes of settlement to the payment of the civil penalty specified herein; and
- g. agrees that in any subsequent administrative or judicial proceeding initiated by the Complainant or the United States for injunctive relief, civil penalties, or other relief relating to the Facility, Respondent shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim preclusion, claim splitting, or other defenses based on any contention that the claims raised by the Complainant or the United States were or should have been brought in the instant case, except with respect to claims that have been specifically resolved pursuant to this CAFO.
- 43. By signing this CAFO, 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 this CAFO.
- 44. Respondent and EPA agree to conciliate this matter without the necessity of a formal hearing and to bear their respective costs and attorneys' fees.

Penalty Assessment and Collection

45. Upon consideration of the entire record herein, including the Findings of Fact and Conclusions of Law, which are hereby adopted and made a part hereof, and upon consideration of the size of the business, the economic impact of the penalty on the business, Respondent's

full compliance history and good faith efforts to comply, the duration of the violation, payment by the violator of any penalties previously assessed for the same violation, the economic benefit of noncompliance, the seriousness of the violation, and other factors as justice may require, EPA has assessed a civil penalty in the amount of \$9,859.00 (the "EPA Penalty"). The EPA Penalty has been determined in accordance with Section 113 of the CAA, 42, U.S.C. § 7413, and at no time exceeded EPA's statutory authority.

- 46. Respondent agrees to pay the EPA Penalty within thirty (30) calendar days of the Effective Date of this CAFO. Respondent shall pay the EPA 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.
 - 47. When making a payment, Respondent shall:
 - a. Identify every payment with Respondent's name and the docket number of this Order, Docket No. CAA-06-2025-3432. The payment shall also be accompanied by a transmittal letter that shall reference Respondent's name and address, the case name, and docket number CAA-06-2025-3432. Respondent's adherence to this request will ensure proper credit is given when penalties are received for Region 6.
 - b. Concurrently with any payment, email proof of such payment and the transmittal letter to the following email addresses:

Gerardo Acosta U.S. EPA Region 6 Acosta.Gerardo@epa.gov

Region 6 Hearing Clerk U.S. EPA Region 6

Vaughn.Lorena@epa.gov

and

U.S. Environmental Protection Agency Cincinnati Finance Center Via electronic mail to: CINWD AcctsReceivable@epa.gov

- c. "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.
- 48. Pursuant to 42 U.S.C. § 7413(d)(5), 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 EPA Penalty per this CAFO, the entire unpaid balance of the EPA 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 Effective Date. If the EPA

 Penalty is paid in full within thirty (30) days, interest accrued is waived. If the EPA

 Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any
 unpaid portion of the EPA Penalty as well as any interest, penalties, and other charges
 are paid in full. Per 42 U.S.C. § 7524(c)(6), interest will be assessed pursuant to 26 U.S.C.
 § 6621(a)(2), that is the IRS standard underpayment rate, equal to the Federal shortterm rate plus 3 percentage points.
 - b. <u>Handling Charges</u>. The United States' enforcement expenses including,
 but not limited to, attorneys' fees and costs of handling collection.

- c. <u>Late Payment Penalty</u>. A ten percent (10%) quarterly non-payment penalty.
- 49. <u>Late Penalty Actions</u>. In addition to the amounts described in the prior

 Paragraph, if Respondent fails to timely pay any portion of the EPA Penalty per this CAFO, EPA

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

 following:
 - a. Refer the debt to a credit reporting agency, a collection agency, or request that the Attorney General bring civil action in the appropriate United States District Court (in which the validity, amount, and appropriateness of the EPA Penalty and of this CAFO shall not be subject to review) to secure payment of the debt, which may include the original penalty, enforcement and collection expenses, nonpayment penalty and interest, 42 U.S.C. § 7413(d)(5) and 40 C.F.R. §§ 13.13 and 13.14;
 - b. Collect the above-referenced debt by administrative offset (*i.e.*, the withholding of money payable by the United States to, or held by the United States for, a person to satisfy the debt the person owes the 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; and
 - 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.

Additional Terms of Settlement

- 50. The provisions of this CAFO shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors and assigns. Respondent shall ensure that all contractors, employees, consultants, firms, or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this CAFO.
- 51. Any change in the legal status of the Respondent, or change in ownership, partnership, corporate or legal status relating to the Facility, will not in any way alter Respondent's obligations and responsibilities under this CAFO.
- 52. By signing this CAFO, Respondent acknowledges that this CAFO will be available to the public and agrees that this CAFO does not contain any confidential business information.

 See 40 C.F.R. Part 2, Subpart B (Confidentiality of Business Information).
- 53. By signing this CAFO, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each submission, response, and statement. Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.
- 54. By signing this CAFO, Respondent certifies that it is presently in compliance with all requirements of the AIM Act, 42 U.S.C. § 7675, and the regulations at 40 C.F.R. Part 84, Subpart A, which governs the import of bulk HFCs, under Section 113(d) of the Clean Air Act, 42 U.S.C. § 7413(d).

- 55. By signing this CAFO, the undersigned representative of Respondent certifies that it is fully authorized to execute and enter into the terms and conditions of this CAFO and has the legal capacity to bind the party it represents to this CAFO.
- 56. Respondent and EPA agree to the use of electronic signatures for this matter. EPA and Respondent consent to service of a final order by email at the following valid email addresses: Cavazos.Christyn@epa.gov (for EPA) and direccion@flexicompuestos.com (for Respondent).
- 57. Respondent specifically waives its right to seek reimbursement of its costs and attorney's fees under 5 U.S.C. § 504 and 40 C.F.R. Part 17. Except as qualified by Paragraph 68.b of this CAFO, each party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.

G. EFFECT OF CONSENT AGREEMENT AND RESERVATION OF RIGHTS

- 58. In accordance with 40 C.F.R. § 22.18(c), completion of the terms of this CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in Sections D and E above.
- 59. The terms, conditions and requirements of this CAFO may not be modified or amended except upon the written agreement of both parties, and approval of the Regional Judicial Officer.
- 60. Penalties paid pursuant to this CAFO shall not be deductible for purposes of Federal, State, and local taxes.
- 61. Any violation of the included Final Order may result in a civil judicial action for an injunction or civil penalties as provided in Section 113(b) of the Act, 42 U.S.C. § 7413(b) and

adjusted for inflation pursuant to 40 C.F.R. Part 19, as well as criminal sanctions as provided in Section 113(c) of the Act, 42 U.S.C. § 7413(c). EPA may use any information submitted under this CAFO in an administrative, civil judicial, or criminal action.

- applicable provisions of the Act and other federal, state, or local laws or statutes, nor shall it restrict EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on, or a determination of, any issue related to any federal, state, or local permit. EPA does not, by its consent to the entry of this CAFO, warrant or aver in any manner that Respondent's compliance with any aspect of this CAFO will result in compliance with provisions of the Clean Air Act, 42 U.S.C. § 7401, et seq., or with any other provisions of federal, state, or local laws, regulations, or permits.
- 63. Nothing herein shall be construed to limit the power of EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.
- 64. If and to the extent EPA finds, after signing this CAFO, that any information provided by Respondent was materially false or inaccurate at the time such information was provided to EPA, EPA reserves any and all of its legal and equitable rights.

H. EFFECTIVE DATE

65. Respondent and Complainant agree to the issuance of the included Final Order.

Upon filing, EPA will transmit a copy of the filed CAFO to Respondent. This CAFO shall become effective after execution of the Final Order by the Regional Judicial Officer on the date of filing

with the Regional Hearing Clerk. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

The foregoing Consent Agreement In the Matter of Mexican Products, LLC, Docket No. CAA-06-2025-3432, is Hereby Stipulated, Agreed, and Approved for Entry.

FOR RESPONDENT:

MEXICAN PRODUCTS, LLC

Date: 07/30/2025

Signature

JULIO DOMINGO URBINA PEREZ Print Name

SHAREHOLDER/VICE PRESIDENT Title

FOR COMPLAINANT:

U.S. ENVIRONMENTAL PROTECTION AGENCY

Date: August 4, 2025

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Digitally signed by CHERYL SEAGER Date: 2025.08.04 10:14:18 -05'00'

Cheryl T. Seager
Director
Enforcement and
Compliance Assurance Division
U.S. EPA, Region 6

FINAL ORDER

Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(d), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/
Termination or Suspension of Permits, 40 C.F.R. Part 22, the foregoing Consent Agreement resolving this matter is hereby ratified and incorporated by reference into this Final Order.

Mexican Products, LLC is ORDERED to comply with all of the terms of the Consent

Agreement. In accordance with 40 C.F.R. § 22.31(b), this Final Order shall become effective upon filing with the Regional Hearing Clerk.

This Final Order shall resolve only those causes of action alleged in the Consent

Agreement. Nothing in this Final Order shall be construed to waive, extinguish, or otherwise

affect Respondent's (or its officers, agents, servants, employees, successors, or assigns)

obligation to comply with all applicable federal, state, and local statutes and regulations,
including the regulations that were the subject of this action.

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Dated	

THOMAS RUCKI Digitally signed by THOMAS RUCKI Date: 2025.08.05

Thomas Rucki Regional Judicial Officer

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Consent Agreement and Final

Order was filed with me, the Regional Hearing Clerk, U.S. EPA - Region 6, 1201 Elm Street, Suite

500, Dallas, Texas 75270-2102, and that I sent a true and correct copy on this day in the

following manner to the email addresses:

Copy via Email to Complainant:

Cavazos.Christyn@epa.gov Acosta.Gerardo@epa.gov

Copy via Email to Respondent:

mark@thebarrerafirm.com bobbybarreralaw@gmail.com direccion@flexicompuestos.com Julio E. Urbina Perez Mexican Products, LLC 1007 Beverly Drive Laredo, Texas 78045

> LORENA VAUGHN

Digitally signed by LORENA VAUGHN Date: 2025.08.06 13:24:27 -05'00'

Regional Hearing Clerk U.S. EPA, Region 6