

DOCKET NO.: HHD-CV-18-6103688-S

ROBERT J. KLEE,
COMMISSIONER OF ENERGY AND
ENVIRONMENTAL PROTECTION

: SUPERIOR COURT

v.

: JUDICIAL DISTRICT OF HARTFORD

AUTO-SWAGE PRODUCTS, INC.
and KEITH BRENTON

:
: MARCH 4, 2020

**STIPULATION FOR JUDGMENT AMONG PLAINTIFF COMMISSIONER,
DEFENDANT KEITH BRENTON, AND DEFENDANT AUTO-SWAGE PRODUCTS,
INC.**

The plaintiff, the Commissioner of Energy and Environmental Protection (“the Commissioner”), defendant Keith Brenton (“Brenton”), and defendant Auto-Swage Products, Inc. (“Auto-Swage”) stipulate that judgment may enter in the above-captioned case in accordance with the following:

WHEREAS, the Commissioner is charged with the supervision and enforcement of the statutes of the State of Connecticut respecting the environment, including Connecticut General Statutes (“Conn. Gen. Stat.”) Ch. 445 governing hazardous waste, and Conn. Gen. Stat. Ch. 446k governing water pollution, and is generally empowered by virtue of Conn. Gen. Stat. § 22a-6(a)(3) to institute legal proceedings necessary to enforce statutes, regulations, permits, or orders administered, adopted, or issued by her;

WHEREAS, Brenton is an individual residing at 7 Davenport Avenue, Milford, CT, 06460;
and

WHEREAS, Brenton is the president of Auto-Swage and is responsible for its day-to-day operations and corporate decisions and has been so continuously since at least January 2011; and

WHEREAS, Auto-Swage Products, Inc. is a Connecticut corporation registered with the Connecticut Secretary of State with a business address of 726 River Road, Shelton, CT; and

WHEREAS, Auto-Swage owns property at 726 River Road, Shelton, Connecticut ("the Site"); and

WHEREAS, Auto Swage acquired the Site on January 24, 1973, as is recorded on the City of Shelton land records at Vol. 0260 and Page. 0332; and

WHEREAS, Auto-Swage held a National Pollution Discharge Elimination Systems (NPDES) Permit No. CT0020286, which permit terminated on December 15, 2017; and

WHEREAS, Auto-Swage is a "generator," as that term is defined in the Regulations of Connecticut State Agencies ("R.C.S.A.") § 22a-449(c)-100(b)(2)(B), incorporating Title 40 of the Code of Federal Regulations ("40 C.F.R.") §260.10, of "hazardous waste" as that term is defined in Conn. Gen. Stat. § 22a-448(3) and R.C.S.A. § 22a-449(c)-101(a), incorporating 40 C.F.R. §261.3; and

WHEREAS, prior to 1982 Auto-Swage stored metal hydroxide sludge in surface impoundments at the Site which surface impoundments were closed in 1990 pursuant to a closure plan approved by the Commissioner and the United States Environmental Protection Agency; and

WHEREAS, Auto-Swage holds Registration No. GSI000625 for the General Permit for the Discharge of Stormwater Associated with Industrial Activity ("GSI permit"); and

WHEREAS, the Commissioner commenced this action by Complaint dated November 15, 2018 against Brenton and Auto-Swage for the alleged non-compliance with a Final Order (Order No. 2017001DEEP, hereinafter the "Order" attached as **Exhibit A**) of the Department of Energy and Environmental Protection ("DEEP" or the "Department"), and for alleged violations of certain environmental laws and regulations at the Site; and

WHEREAS, the Commissioner further alleges that Auto-Swage has failed to pay annual charges and late fees for obtaining and maintaining a NPDES Water Pollution Control Permit, generator of large amounts of hazardous waste, groundwater monitoring at hazardous waste treatment, storage or disposal facility, and maintaining a hazardous waste treatment, storage or disposal facility; and

WHEREAS, the Commissioner alleges that Auto-Swage, by virtue of the storage of hazardous waste generated at the Site for more than (90) days, violated R.C.S.A § 22a-449(c)-102(a)(1); and

WHEREAS, the Commissioner alleges that Auto-Swage failed to conduct post-closure groundwater monitoring at the Site since 2011 in violation of R.C.S.A. §§ 22a-449(c)-105(a)(1) and 22a-449(c)-105(a)(2)(N); and

WHEREAS, the Commissioner alleges that Auto-Swage failed to update its financial assurance for surface impoundments at the Site since 2011 in violation R.C.S.A. §§ 22a-449(c)-105(a)(1) and 22a-449(c)-105(a)(2); and

WHEREAS, the Commissioner alleges that Auto-Swage failed to perform corrective action at the Site in violation of R.C.S.A. § 22a-449(c)-105(h); and

WHEREAS, the parties believe it is in the public interest to resolve this matter without further litigation,

NOW, THEREFORE, without the adjudication of any issue and, the Commissioner, Brenton, and Auto-Swage agree that judgment may enter in accordance with the following terms:

Injunctive Provisions

1. An injunction is entered requiring Brenton and Auto-Swage, and each of them, to comply with DEEP Order No. 2017001DEEP (**Exhibit A**); specifically, but without limitation, Defendants shall themselves or shall cause one or more third parties to:

a. Consultant Retention. On or before twenty-one (21) calendar days from entry of judgment pursuant to this Stipulation for Judgment, Brenton and Auto-Swage shall identify, or cause one or more third parties to identify, for the Commissioner's review and written approval, one or more qualified consultant(s) to prepare the documents and implement or oversee the actions required by the Order and this Stipulation for Judgment. Within ten (10) days after retaining any qualified consultant(s) other than one originally identified and approved under this paragraph, Brenton and Auto-Swage shall notify or shall cause one or more third parties to notify the Commissioner in writing of the identity of and receive written approval of such other qualified consultant(s) from the Commissioner. In order to seek approval of a qualified consultant(s), Brenton and Auto-Swage shall submit or cause one or more third parties to submit to the Commissioner a description of a qualified consultant(s)' education, experience and training which is relevant to the work required by this Order. The consultant(s) retained to prepare the documents and implement or oversee the actions required by this Order must be an independent, registered professional engineer in the State of Connecticut ("P.E.") or must provide professional services in accordance with Section 22a-133v-1 through 8 of the R.C.S.A. (the Licensed Environmental Professional Regulations) and must provide professional services in accordance with the Hazardous Waste Management Regulations, Remedial Standard Regulations, and Water Pollution Control. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.

b. Decommissioning of Process Tanks and the Wastewater Treatment System. On or before sixty (60) calendar days after entry of judgment pursuant to this Stipulation for Judgment, Brenton and Auto-Swage shall submit or cause one or more third parties to submit, for the Commissioner's review and written approval, a plan and schedule to identify, characterize and remove all waste and virgin materials and decommission all process tanks, process areas, and the wastewater collection and treatment systems associated with the Wastewater Discharge Permit, including but not limited to any materials in the 30-gallon pin collector/settling tank, EQ tank, the pre-treatment tank, the neutralization tank, the flocculation tank, the clarifier, the filter press, and the cyanide destruct system. Brenton and Auto-Swage shall carry out or shall cause one or more third parties to carry out the approved plan in accordance with the plan and schedule as approved by the Commissioner. On or before fifteen (15) days after completion of the work required by this paragraph, Brenton and Auto-Swage shall submit or shall cause one or more third parties to submit to the Commissioner written certification confirming that such work has been completed as set forth in the plan approved by the Commissioner.

c. Stormwater. Brenton and Auto-Swage shall monitor or shall cause one or more third parties to monitor stormwater as required by Section 5(e) of the GSI Permit (Registration No. GSI000625), Brenton and Auto-Swage shall conduct or shall cause one or more third parties to conduct comprehensive site inspections and routine inspections as required by Section 5(d) of the GSI permit Registration No. GSI000625, and Brenton and Auto-Swage shall implement or shall cause one or more third parties to implement and comply with the Stormwater Pollution Prevention Plan in accordance with the approval issued by the Commissioner on June 7, 2018 (See Approval attached as **Exhibit B**).

d. Hazardous Waste. Brenton and Auto-Swage shall cause one or more third parties to manage all hazardous waste generated or stored at the Site in accordance with the Connecticut Hazardous Waste Management Regulations, R.C.S.A. §§ 22a-449(c)-100 – 22a-449(c)-119. On or before sixty (60) calendar days after entry of judgment pursuant to this Stipulation for Judgment, Brenton and Auto-Swage shall submit or shall cause one or more third parties to submit, for the Commissioner's review and written approval, a plan and schedule to close each hazardous waste storage area at the Site in accordance with R.C.S.A. § 22a-449(c)-102(a)(2)(K), incorporating by reference 40 CFR §§ 262.34(a)(1), 265.111, and 265.114. The plan shall be consistent with the Department's May 1, 2013 document entitled, "Draft R.C.R.A. Closure Guidance for Generators Who Store Less Than 90 Days, Container Storage and Tank Systems." Brenton and Auto-Swage shall cause one or more third parties to close the hazardous waste storage area(s) in accordance with the plan and schedule as approved by the Commissioner. On or before fourteen (14) days after closure of the hazardous waste storage area(s) in accordance with the approved plan, Brenton and Auto-Swage shall submit or cause one or more third parties to submit a hazardous waste storage area closure report for the Commissioner's review and written approval. This report shall document the activities performed in accordance with the approved plan.

e. RCRA Corrective Action and Post-Closure Maintenance and Monitoring. Brenton and Auto-Swage shall perform and complete or shall cause one or more third parties to perform and complete corrective action at the Site in accordance with R.C.S.A. § 22a-449(c)-105(h) and conduct post-closure maintenance and groundwater monitoring of the closed surface impoundments at the Site in accordance with DEEP approved post-closure plan and R.C.S.A. §§ 22a-449(c)-105(a)(1) and 22a-449(c)-105(a)(2)(N). On or before sixty (60) calendar days after entry of judgment pursuant to this Stipulation for Judgment, Brenton and Auto-Swage shall submit

or shall cause one or more third parties to submit, for the Commissioner's review and written approval, a plan and schedule to complete corrective action, in accordance with R.C.S.A. § 22a-449(c)-105(h). The plan shall include, but not be limited to, completion of site-wide investigation in accordance with prevailing standards and guidelines and completion of site-wide remediation in accordance with the Remediation Standard Regulations -- R.C.S.A. §§ Sections 22a-133k-1 through 22a-133k-3. On or before sixty (60) days after entry of judgment pursuant to this Stipulation for Judgment, Brenton and Auto-Swage shall submit or shall cause one or more third parties to submit, for the Commissioner's review and written approval, a cost estimate, plan and schedule to conduct maintenance and groundwater monitoring of the closed surface impoundments at the Site in accordance with DEEP approved post-closure plan and R.C.S.A. §§ 22a-449(c)-105(a)(1) and 22a-449(c)-105(a)(2)(N).

f. Brenton and Auto Swage shall cause all of the remediation work pursuant to subsection 1.a, 1.b., 1.d., and 1.e of this paragraph to be completed no later than Seven Hundred and Thirty (730) calendar days from the date of entry of judgment pursuant to the Stipulation for Judgment, and in accordance with the plan as approved by the Commissioner in writing. The requirements of subsection 1.c. of this paragraph are ongoing until otherwise determined by DEEP. The remediation work shall comply with all applicable laws and regulations and with the terms of this Stipulation for Judgment, Order No. 2017001DEEP, or as further identified and required by the Commissioner. Upon completion of the remediation work Brenton and Auto-Swage shall submit or cause one or more third parties to submit to the Commissioner a Final Report for her review and written approval.

g. Each plan and report submitted to the Commissioner pursuant to this paragraph shall include a certification page signed by the person who prepared it, which states: "I have

personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate, and complete to the best of my knowledge and belief, I understand that any false statement made in the submitted information is punishable as a criminal offense under § 53a-157b of the Connecticut General Statutes and any other applicable law."

2. A permanent injunction is entered prohibiting Brenton and Auto-Swage, and each of them, from violating any provision of Conn. Gen. Stat. Ch. 445, governing hazardous waste, or the regulations implementing the provisions of that chapter.

3. A permanent injunction is entered prohibiting Brenton and Auto-Swage, and each of them, from violating any provision of Conn. Gen. Stat. Ch. 446k, governing water pollution and hazardous waste, or the regulations implementing the provisions of that chapter.

Financial and Civil Penalty Provisions

4. Brenton and Auto-Swage will pay, or will cause one or more third parties to pay, to the Commissioner the sum of One Hundred Fifty Eight Thousand Three Hundred Ninety Five dollars and Sixty One cents (\$158,395.61) for the unpaid fees, interest and expenses owed to the Commissioner by Auto-Swage ("the back fees"). This payment shall occur no later than twenty-one days (21) calendar days from March 4, 2020. The payment shall be by bank check or certified funds made payable to "Department of Energy and Environmental Protection" and addressed to Assistant Attorney General Michael W. Lynch at 165 Capitol Ave., Hartford, Connecticut 06106.

5. If payment of the back fees totaling \$158,395.61, as required by paragraph 4 above, is not timely received by March 25, 2020, then the full amount of the fees owed to the DEEP, currently Two Hundred Seventeen Thousand Seven Hundred Sixty Five Dollars and Eleven Cents

(\$217,765.11) plus any other late fees assessed pursuant to Conn. Gen. Stat. § 22a-6(f)(a), will be immediately due and owing.

6. If the provisions of paragraph 4, above, are not timely complied with then a civil penalty in the amount of Seven Hundred Fifty Thousand Dollars (\$750,000.00) will be imposed jointly and severally on Brenton and Auto-Swage on March 25, 2020. And the Commissioner will record a judgment lien in the amount of \$750,000 against the Site on the city of Shelton land records.

7. If the provisions of paragraph 4 above are fully complied with then a civil penalty in the amount of One Hundred Thousand Dollars (\$100,000.00) is imposed on Brenton. After entry of judgment pursuant to this Stipulation for Judgment, the Commissioner may file a judgment lien on the land records with the Town of Shelton in the amount of One Hundred Thousand Dollars (\$100,000.00) against the Site ("the Brenton Judgment Lien").

This civil penalty shall be paid in accordance with the terms of this paragraph.

a. Brenton will pay to the Commissioner Twelve Thousand Five Hundred dollars (\$12,500.00) within seven (7) calendar days from the date of sale of a certain property located at 7 Davenport Ave., Milford, CT 06460, (more fully described in the Milford Property Report as Map 048, Block 730, Lot 16), or one hundred and eighty (180) calendar days from the date of entry of judgment pursuant to this Stipulation for Judgment, whichever date occurs first (the "first payment"). Payment shall be by bank check or certified funds made payable to "Treasurer, State of Connecticut" and addressed to Assistant Attorney General Michael W. Lynch at 165 Capitol Ave., Hartford, Connecticut 06106.

b. Brenton will pay to the Commissioner Twelve Thousand Five Hundred dollars (\$12,500.00) within one hundred and eighty (180) calendar days from the date the first

(\$217,765.11) plus any other late fees assessed pursuant to Conn. Gen. Stat. § 22a-6(f)(a), will be immediately due and owing.

6. If the provisions of paragraph 4, above, are not timely complied with then a civil penalty in the amount of Seven Hundred Fifty Thousand Dollars (\$750,000.00) will be imposed jointly and severally on Brenton and Auto-Swage on March 25, 2020. And the Commissioner will record a judgment lien in the amount of \$750,000 against the Site on the city of Shelton land records.

7. If the provisions of paragraph 4 above are fully complied with then a civil penalty in the amount of One Hundred Thousand Dollars (\$100,000.00) is imposed on Brenton. After entry of judgment pursuant to this Stipulation for Judgment, the Commissioner may file a judgment lien on the land records with the Town of Shelton in the amount of One Hundred Thousand Dollars (\$100,000.00) against the Site ("the Brenton Judgment Lien").

This civil penalty shall be paid in accordance with the terms of this paragraph.

a. Brenton will pay to the Commissioner Twelve Thousand Five Hundred dollars (\$12,500.00) within seven (7) calendar days from the date of sale of a certain property located at 7 Davenport Ave., Milford, CT 06460, (more fully described in the Milford Property Report as Map 048, Block 730, Lot 16), or one hundred and eighty (180) calendar days from the date of entry of judgment pursuant to this Stipulation for Judgment, whichever date occurs first (the "first payment"). Payment shall be by bank check or certified funds made payable to "Treasurer, State of Connecticut" and addressed to Assistant Attorney General Michael W. Lynch at 165 Capitol Ave., Hartford, Connecticut 06106.

b. Brenton will pay to the Commissioner Twelve Thousand Five Hundred dollars (\$12,500.00) within one hundred and eighty (180) calendar days from the date the first

payment becomes due (the "second payment"). The second payment shall be by bank check or certified funds made payable to "Treasurer, State of Connecticut" and addressed to Assistant Attorney General Michael W. Lynch at 165 Capitol Ave., Hartford, Connecticut 06106.

c. If the work required by paragraph 1 of this Stipulation for Judgment is completed timely and the Commissioner approves all final certifications and final reports required by this Stipulation for Judgment and the Order, and if, prior to the Commissioner's approval of such certifications and reports, Brenton does not violate paragraphs 2 through 3 of this Stipulation, and if the Treasurer timely receives the first and second payments as set forth above, then the \$100,000 civil penalty as to Defendant Brenton will be deemed satisfied in full and the Commissioner will release the Brenton Judgment lien.

d. If the work required by paragraph 1 of this Stipulation for Judgment and the Order is not completed timely, or if the Commissioner does not approve all final certifications and final reports submitted pursuant to this Stipulation for Judgment and the Order, or, if prior to the Commissioner's approval of any final certifications or final reports, Brenton violates paragraphs 2 or 3 of this Stipulation, or Brenton fails to timely make the first and second payment as set forth above, then the entire \$100,000 civil penalty will be immediately due and payable and will remain in force and effect and the Brenton Judgment lien against the Site will remain on the Shelton land records until the entire civil penalty of \$100,000 has been satisfied.

8. If the provisions of paragraph 4 above are fully complied with then a a civil penalty in the amount of Four Hundred Fifty Thousand Dollars (\$450,000.00) is imposed on Auto-Swage Products, Inc. This civil penalty shall be paid in accordance with the terms of this paragraph.

a. After entry of judgment pursuant to this Stipulation for Judgment, the Commissioner may file a judgment lien on the land records with the Town of Shelton in the amount of Four Hundred and Fifty Thousand Dollars (\$450,000.00) against the Site (“the Auto-Swage Judgment Lien”).

b. If the work required by paragraph 1.b. of this Stipulation for Judgment is completed timely and if the Commissioner approves the reports required by paragraph 1.b., and if the payment of the back fees is complete as per paragraph 5 of this Stipulated Judgment, then One Hundred Fifty Thousand Dollars (\$150,000.00) of this civil penalty shall be deemed satisfied and the Commissioner shall release One Hundred Thousand Dollars (\$150,000.00) of the Auto-Swage Judgment Lien.

c. If the requirements of paragraph 1.d. of this Stipulation for Judgment are completed timely, and payment of the back fees is complete as per paragraph 5 of this Stipulated Judgment, then One Hundred Fifty Thousand Dollars (\$150,000.00) of this civil penalty shall be deemed satisfied and the Commissioner shall release One Hundred Fifty Thousand Dollars (\$150,000.00) of the Auto-Swage Judgment Lien.

d. If the requirements of paragraph 1. f. are completed timely, and if the requirements of paragraph 1.c. have been satisfactorily performed, and once the Commissioner has issued her written approval of the Final Report submitted per paragraph 1. f. of this Stipulation for Judgment, and provided that payment has been received per paragraph 5 of this Stipulation for Judgment, and provided that there exist no outstanding violations of the environmental statutes of the State of Connecticut, including, but not limited to, Chapters 445 and 446k, ongoing at the Site, than the Commissioner shall release the final One Hundred Fifty Thousand Dollars (\$150,000.00) of the Auto-Swage Judgment lien.

General Provisions

9. Brenton and Auto-Swage's obligations under this judgment shall not be affected by the passage of title of the Site to any other person, entity or municipality, or by any occupation of the Site by any lessee, tenant, or third party.

10. Within fifteen (15) days after the date the defendants become aware of any material change in any relevant information submitted to the Commissioner under this Stipulation for Judgment, or that any such information was materially inaccurate or misleading, or that any material or relevant information was omitted, defendants shall submit, separately from any reports required under this Stipulation for Judgment, the correct or omitted information to the Commissioner.

11. In the event that the defendants become aware that they did not or may not substantially comply, or did not or may not substantially comply on time, with any requirement of this Stipulation for Judgment, or any document required hereunder, the defendants shall promptly notify the Commissioner, and shall take reasonable steps to ensure that such noncompliance or delay is avoided or, if unavoidable, is reasonably minimized. In so notifying the Commissioner, the defendants shall state in writing the reasons for the substantial noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and the defendants shall comply with any such proposed dates that may be approved in writing by the Commissioner. Notification by the defendants under this paragraph shall not by itself excuse noncompliance or delay.

12. Nothing in this Stipulation for Judgment or in the judgment entered pursuant thereto shall affect the authority of the Commissioner to institute any proceeding to prevent or abate

violations of law, prevent or abate pollution, recover costs and natural resource damages, and seek or assess civil penalties in accordance with law. If, at any time, the Commissioner determines that actions taken by Brenton or Auto-Swage pursuant to this Stipulation for Judgment have not successfully abated or prevented pollution, the Commissioner may institute any proceeding to require Brenton or Auto-Swage or any third party to prevent or abate pollution.

13. Nothing in this Judgment shall relieve Brenton or Auto-Swage from their obligations under applicable federal, state and local law.

14. Any representative of DEEP may enter the Site without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this Stipulation for Judgment. Brenton or Auto-Swage shall cause one or more third parties occupying the site to honor this provision.

15. Nothing in this Stipulation for Judgment or in the judgment entered pursuant thereto shall affect the authority of the Commissioner to institute any proceeding to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and seek or assess civil penalties in accordance with law as to any third party that may occupy the Site following entry of this Stipulation for Judgment.

16. Any document required to be submitted to the Commissioner under this Stipulation for Judgment shall, unless otherwise specified in writing by the Commissioner, be directed to:

Melissa J. Blais, P.E., Supervising Sanitary Engineer
Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division
79 Elm Street
Hartford, CT 06106-5127

In addition, any document required to be submitted to the Commissioner under subparagraphs 1(d) and 1(f) of this Stipulation for Judgment shall also be directed to:

Joseph A. Schiavone, Supervising Environmental Analyst
Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division
79 Elm Street
Hartford, CT 06106-5127

In addition, any document required to be submitted to the Commissioner under subparagraphs 1(e) and (f) of this Stipulation for Judgment shall also be directed to:

Patricia DeRosa, Supervising Environmental Analyst
Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse
Remediation Division
79 Elm Street
Hartford, CT 06106-5127

Any document required to be submitted to Brenton or Auto-Swage under this judgment shall, unless otherwise specified in writing by Brenton, be directed to:

Christopher B. Carveth, Esq.
Carveth & Foley, Attorneys at Law
26 Cherry Street
P.O. Box 152
Milford, CT 06460-0152

17. This Stipulation for Judgment shall resolve all the allegations of the Complaint against Brenton and Auto-Swage Products, Inc.

Joseph A. Schiavone, Supervising Environmental Analyst
Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division
79 Elm Street
Hartford, CT 06106-5127

In addition, any document required to be submitted to the Commissioner under subparagraphs 1(e) and (f) of this Stipulation for Judgment shall also be directed to:

Patricia DeRosa, Supervising Environmental Analyst
Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse
Remediation Division
79 Elm Street
Hartford, CT 06106-5127

Any document required to be submitted to Brenton or Auto-Swage under this judgment shall, unless otherwise specified in writing by Brenton, be directed to:

Christopher B. Carveth, Esq.
Carveth & Foley, Attorneys at Law
26 Cherry Street
P.O. Box 152
Milford, CT 06460-0152

17. This Stipulation for Judgment shall resolve all the allegations of the Complaint against Brenton and Auto-Swage Products, Inc.

PLAINTIFF,

**COMMISSIONER OF ENERGY AND
ENVIRONMENTAL PROTECTION**

WILLIAM TONG
ATTORNEY GENERAL

By: 

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DEFENDANT,


KEITH BRENTON



**AUTO-SWAGE PRODUCTS,
INC.,**



By: Keith Brenton



Christopher B. Carveth, Esq.
Carveth & Foley, Attorneys at Law
26 Cherry Street
P.O. Box 152
Milford, CT 06460-0152
cbcarveth@carvethlaw.com

CERTIFICATION

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on March 4, 2020 to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

Christopher B. Carveth, Esq.
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/s/ Michael W. Lynch
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