

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region 10, 1200 Sixth Avenue, Suite 155, Seattle, Washington 98101 **EXPEDITED SETTLEMENT AGREEMENT**

Construction Stormwater Violations

Docket Number: CWA- 10-2025-0061 NPDES No. WAR313285 Penalty Amount: \$3,180 Inspection Date: September 16, 2024

the meaning of Section 502(5) of the Clean Water Act ("Act"), 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.

Attached is an "Expedited Settlement Offer Worksheet" ("Settlement Worksheet"), which is incorporated by reference. By its signature, Complainant ("EPA") finds that Respondent is responsible for the alleged violations specified in the Settlement Worksheet.

Respondent failed to comply with the condition(s) or limitation(s) of a duly issued permit pursuant to Section 402 of the Act, 33 U.S.C. § 1342, and Section 301(a) of the Act, 33 U.S.C. § 1311(a).

EPA finds, and Respondent admits, that Respondent is subject to Section 301(a) of the Act, 33 U.S.C. § 1311, and that EPA has jurisdiction over any "person" who "discharges pollutants" from a "point source" to "waters of the United States." Respondent neither admits nor denies the alleged violations specified in the Settlement Worksheet or this Expedited Settlement Agreement ("Agreement").

This Agreement constitutes a Consent Agreement and Final Order, which EPA is authorized to enter under the authority vested in the Administrator of EPA by Section 309(g)(2)(A) of the Act, 33 U.S.C. § 1319(g)(2)(A), and by 40 C.F.R. § 22.13(b). The parties enter into this Agreement to settle the civil violation(s) alleged in this Agreement for a penalty of \$3,180. Respondent consents to the assessment of this penalty and waives the right to: (1) contest the finding(s) specified in the Settlement Worksheet; (2) a hearing pursuant to Section 309(g)(2) of the Act, 33 U.S.C. § 1319(g)(2); and (3) appeal pursuant to Section 309(g)(8), 33 U.S.C. § 1319(g)(8). By signing this 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 Agreement. Respondent also agrees to bear its own costs and attorney's fees related to this Agreement.

Additionally, Respondent certifies, subject to civil and criminal penalties for making a false statement to the United States Government, that the alleged violations identified in the Settlement Worksheet have been corrected. Respondent shall submit a written report and other documentation with this Agreement detailing the specific actions taken to correct the alleged violations cited herein.

This documentation may include monitoring, inspection and maintenance reports,

BP Products North America ("Respondent") is a "person," within documentation of corrective actions, certification records, and other records required for compliance with permit documentation and recordkeeping conditions.

> Respondent certifies that, within thirty (30) days after the effective date of the Final Order, Respondent will submit electronic payment via www.pay.gov or submit a bank, cashiers, or certified check, with case name and docket number noted, for the amount specified above, payable to the "Treasurer, United States of America," via certified mail, to:

> > **Regional Hearing Clerk** U.S. EPA, Region 10 Fines and Penalties, Cincinnati Finance Center In the Matter of: BP Products North America Docket No.: CWA-10-2025-0061 P.O. Box 979077 St. Louis, MO 63197-9000

Respondent agrees that consistent with section 162(f)(1) of the Internal Revenue Code, 26 U.S.C. § 162(f)(1), it will not deduct the penalties paid under this Agreement for federal tax purposes.

This Agreement settles EPA's civil penalty claims against Respondent for the alleged Clean Water Act violation(s) specified in this Agreement. EPA does not waive its rights to take any enforcement action against Respondent for any other past, present, or future civil or criminal violation of the Act or of any other federal statute or regulation. EPA does not waive its right to issue a compliance order for any uncorrected alleged violation(s) described in the Settlement Worksheet. EPA has determined this Agreement to be appropriate.

Prior to requesting that an EPA Regional Judicial Officer issue the Final Order, EPA will provide a copy of the Agreement to the state of Washington for the purposes of consultation with Washington on the appropriateness of this Agreement. EPA will also provide public notice of this Agreement and a reasonable opportunity for public comment on it. EPA will address any comments on the Agreement in accordance with section 309(g)(1) and (4)(A) of the Act, 33 U.S.C. § 1319(g)(1) and (4)(A), and 40 CFR §§ 22.38 and 22.45.

This Agreement is binding on the parties signing below and becomes effective when the Final Order is executed and filed with the Regional Hearing Clerk pursuant to 40 C.F.R. § 22.31(b).

APPROVED BY RESPONDENT:
Name (print):
Title (print):
Signature:Date:
APPROVED BY EPA:
Edward J. Kowalski, Director Enforcement and Compliance Assurance Division
More than 40 days have elapsed since providing the Agreement to Washington and the issuance of public notice pursuant to Section 309(g)(1) and (4)(A) of the Act, 33 U.S.C. § 1319(g)(1) and (4)(A), and EPA has received no comments concerning this matter.
Katrina Chambon, Case Officer Enforcement and Compliance Assurance Division
Having determined that this Agreement is authorized by law, IT IS SO ORDERED:
Regional Judicial Officer Region 10 U.S. Environmental Protection Agency

Expedited Settlement Offer Worksheet Findings and Alleged Violations Consult instructions regarding eligibility criteria and procedures prior to use Version: 2021 Washington State Construction Stormwater General Permit



	LEGAL NAME AND MAILING ADDRESS OF OPERATOR		Telephone Number		NPDES Permit Number					
1	Brenda Donovan		(253) 285-1859			WAR313285				
	BP Products North America		Inspector Name			Emily Siangkam				
	P.O Box 6038		Inspector Name. Inspector Agency: Entrance Interview Conducted:			EPA Region 10				
Н	Artesia, California 90702				Yes					
	Titobia, Samornia 50752		Exit Interview Conducted:				Yes			
+	LOCATION AND ADDRESS OF SITE		Exit Interview g		u.	N.		and Josh Smith		
2	Delridge Arco AM PM					IV				
			Exit Interview d	ate / tim	e:	_	Septembe	r 16, 2024		
_	7301 Delridge Way SW									
	Seattle, Washington 98106									
	FACILITY DESCRIPTION / CONTACT NAMES									
3		Name of Site Contact (ESO Worksheet recipient):	Jared Gallien							
		Name of Authorized Official (40 CFR 122.22):	Brenda Donova	n						
		Inspection Date:	09/16/2024							
		Start Construction Date:								
		Estimated Completion Construction Date:	10/02/2024							
\vdash		If Unpermitted, Number of Months Unpermitted:	10/02/2024							
-		ii Onpermitted, Number of Months Onpermitted.	Longfollow Co	rook (20	2/d\ listed for	tomno	ratura diasal	und avugan E anli		
		Name of Receiving Water Body (Indicate whether 303(d) listed):	Longiellow Cl	eek (30	3(a) listed for and fec			ved oxygen, E.coli		
\vdash										
\vdash		Acres Disturbed Acres for Whole Common Plan:			0.12 Acres	s U.851	Acres			
	Operator Requested Rainfall Erosivity or TMDL Waiver (44 CFR 122.2)	6(b)(15))								
	PERMIT COVERAGE	Findings	CGP Citation	RCA*	No. of Deficiencie	Mult- imply	Penalty Amount	Total		
4	Operator discharged stormuster without a name to a second storm		CWA 204		S	أتتع	\$600.00	\$		
	Operator discharged stormwater without a permit on one or more days during months (# of months with an unauthorized discharge		CWA 301; S1.B.1				φουυ.00	3		
	equals number of violations) USE OF CATIONIC TREATMENT CHEMICALS (WHERE									
_	APPLICABLE)		00.5.0.				00000			
	Proper notice was not provided for use of cationic treatment chemicals prior to submittal of the NOI. NOTE that this applies only to the failure to		S9.D.9.i		1		\$300.00	\$		
	prior to submittal of the NOI. NOTE that this applies only to the failure to provide notice in the absence of a discharge to a storm drain or water.				1					
	provide neade in the absence of a discharge to a storm drain of water.				1					
	PUBLIC NOTICE OF PERMIT COVERAGE									
6 A	Notice not published as required. (If no sign/notice published, leave		S2.B				\$300.00	\$		
~ ^	element B blank.)		52.5		Ī		ψ550.00			
В	Notice was missing one or more elements required by the Permit. (Count		S2.B.1-6		1	\vdash	\$60.00	\$		
ا ا	each omission under B as one violation.)				1		¥00.00			
	SWPPP REVIEW									
	No SWPPP prepared at time of inspection. (If no SWPPP, leave		S9				\$6,000.00	\$		
	elements 8 - 21 blank)				<u></u>	L l				
	SWPPP prepared after construction start (# of months = # of violations		S3.B; S9				\$1,000.00	\$		
	with a maximum penalty of \$6,000). NOTE that elements 9 - 21 only									
	apply to the months when the operator had a SWPPP. The maximum									
_	penalty for all SWPPP violations is \$6,000.									
			S9.B.1.a;				\$600.00	\$		
	site over which each operator has control.		S.9.B.1.d; S.9.B.2							
R	SWPPP does not identify stormwater team and respective		S4.B.1.b;		ł	-	\$300.00	\$		
В	responsibilities.		S4.B.1.b; S4.B.3		Ī		ψυυυ.υυ	3		
10	SWPPP does not include:		SB.0							
	Description of the nature of construction activities.		S9.B.1.d;			-	\$120.00	\$		
, ·	or are reserved to some action desirates.		S9.B.2		1		¥120.00	4		
В	The size of the property; the total area expected to be disturbed by the		S9.E; S9.E.4			\Box	\$120.00	\$		
	construction activities; the maximum area expected to be disturbed at any				Ī		,	ĺ		
	one time including onsite and offsite construction support activity areas.				Ī					
C	A description of any onsite/offsite construction support activities.		S1.C.2; S9.E.6				\$600.00	\$		
D	A description and projected schedule for each portion of the site that		S9.B.1.d;				\$300.00	\$		
	includes all elements/dates required by the Permit. (Count each omitted		S9.B.2		Ī					
	category as one violation.)				Ī					
_	A list and description of all a distant assessment 2000		00.0.0	!	!	1	****			
	1 1 5 5		S9.B.2		1	ш	\$300.00	\$		
F	Public Emergencies: Required information for public emergency		S5.F		Ī		\$300.00	\$		
	situations. NOTE that operator has 30 days to complete SWPPP after commencing construction.				1					
11	Site Map									
	Site map not included in SWPPP.		\$9.E			-	\$600.00	5		
	Site map does not include all elements required by the Permit. (Count	During the 9/16/2024 inspection, the inspector observed that 1) the vicinity	S9.E.1-11	х	3	\vdash	\$60.00	\$18		
В	each omission as one violation up to \$600.)	maps did not identify the receiving waters (Longfellow Creek) within one mile	00.L. I-11	^			ψ00.00	\$10		
	1,	of the site. 2) The site maps did not identify the direction of stormwater flow								
		before and after major grading activities 3) the map did not include the			Ī					
		locations of all surface waterbodies and wetlands. These observations			Ī					
		constitute three violations S9.E, S9.E.3 and S9.E.7 of the permit.			1					
10	lowen .					\vdash				
	SWPPP does not:									
	Identify all authorized non-storm water discharges that will or may occur.		S9.E.8;		Ī		\$600.00	\$		
	-		S1.C.3		1	\vdash	\$300.00	,		
Α	Describe the angelfic controls to be involved to the control of		CO 4 4					5		
Α	Describe the specific controls to be implemented to meet the effluent		S9.A.1;				ψ300.00			
Α	limits for erosion and sediment controls. (Count one violation for each		S9.A.1; S9.D.4				\$300.00			
Α	limits for erosion and sediment controls. (Count one violation for each missing control measure up to a maximum of \$900.)		S9.D.4							
Α	limits for erosion and sediment controls. (Count one violation for each missing control measure up to a maximum of \$900.) For each specific erosion and sediment control identified in the SWPPP,						\$100.00	\$		
Α	limits for erosion and sediment controls. (Count one violation for each missing control measure up to a maximum of \$900.) For each specific erosion and sediment control identified in the SWPPP, include all information required by the Permit. (Count 1 violation for each		S9.D.4							
Α	limits for erosion and sediment controls. (Count one violation for each missing control measure up to a maximum of \$900.) For each specific erosion and sediment control identified in the SWPPP,		S9.D.4					•		
Α	limits for erosion and sediment controls. (Count one violation for each missing control measure up to a maximum of \$900.) For each specific erosion and sediment control identified in the SWPPP, include all information required by the Permit. (Count 1 violation for each		S9.D.4					•		

C								
	Describe the specific controls to be implemented to meet the effluent limits for pollution prevention. (Count one violation for each missing control measure up to a maximum of \$900.)	During the 9/16/2024 inspection, the inspector observed potable water flowing down the driveway of the property from an air/water station. The SWPPP did not discuss that the discharge from potable water must undergo dechlorination to a concertation of 0.1 parts per million or less and pH adjustment to within 6.5-8.5 standard units, if necessary. This observation	S9.A.2; S9.C.4; S9.D.9; S1.C.3	х	1		\$300.00	\$300
	For each specific pollution prevention control measure identified in the SWPPP, include all information required by the Permit. (Count each control with incomplete information on 1 yielding.)	consititutes one violation of S1.C.3 of the permit.	S9.D.9.a-j				\$100.00	\$0
	Describe the specific controls to be implemented to meet the effluent		S9.D.10				\$300.00	\$0
	For each specific dewatering control measure identified in the SWPPP,		S9.D.10.a-d				\$300.00	\$0
	incomplete information as 1 violation.)							
	initiation and/or completion of Vegetative Stabilization the circumstances		S9.D.5; S9.D.8				\$300.00	\$0
			S9.B.2; S9.D.12				\$600.00	\$0
	does not include all information required by the Permit. (Count each		S4.B.2.c.2; S4.B.4.g a-l; S9.B.1.e				\$120.00	\$0
	SWPPP does not include documentation that required personnel were, or		S4.B.1				\$300.00	\$0
	Threatened and Endangered Species Act documentation is not included		N/A				\$600.00	\$0
	Historic Properties documentation is not included in SWPPP.		N/A				\$600.00	\$0
			S3.D				\$600.00	\$0
	for Certain Subsurface Stormwater Controls.		CO D 40 a				¢c00.00	60
	Copy of NOI and relevant correspondence, acknowledgement letter		S5.C				\$300.00	\$0 \$0
	SWPPP. (Count each omission as one violation.)							
	Copy of SWPPP is not retained on site or otherwise easily accessible.		S5.C; S5.G.1.c				\$600.00	\$0
Α			S9.D.12.c			1	\$60.00	\$0
	by the Femilia (Count each offission as one violation.)							
		During the 9/16/2024 inspection, the inspector identified that the SWPPP had not been updated since construction began on May 28, 2024. 1) The June 2024 discharge monitoring report (DMR) indicated a turbidity sample had reached 164 NTUs for the week of 6/3/2024. The SWPPP was not modified to show the silt fences were replaced with straw wattles. 2) The July 2024 DMR documented a corrective action that a silt fence needed replacing. None of the changes or maintenance actions are reflected in the sites maps, nor are the revisions in the SWPPP pararative. 3) the SWPPP was not modified to include Mr. Dennis Lindelof as an CECSL inspector. t. These observations constitute three violations of S9.B.2 and S4.B.1.b of the Permit	S9.B.2; S4.B1.b	х	3		\$60.00	\$180
	INSPECTIONS	renni.						
A	Number of Inspections required if performed every 7 days:							
С	If known, and if applicable, number of days of rainfall of > 0.25":							
D	Number of inspections required under a reduced frequency							
F	TOTAL number of inspections conducted/documented							
Α	All required inspections were not conducted and timely documented. (If NO inspections were conducted and documented, then leave elements 24-28 blank)		S4.B.1.b; S4.B.4				True or False	
В	Inspections not performed and timely documented. (Count each failure to inspect and document as one violation.)		S4.B.2				\$300.00	\$0
	Inspections not conducted by qualified personnel. (Count each inspection conducted without qualified personnel as one violation.)		S4.B				\$60.00	\$0
	Areas to be inspected and signs and conditions to be checked for:		S4.B.3			1	\$60.00	\$0
	for signs of erosion or sedimentation or to check for conditions that could							
	Site inspection report does not include all information required by the	During the 9/16/2024 inspection, the inspector identified 1) that the most	S4.B.4.a-m	х	2	1	\$60.00	\$120
	Permit. (Count each omission as one violation.)	recent inspection report dated September 4, 2024 does not include an implementation schedule for the remedial action for the incorrect installation of the silt dike (photos 28-29). 2) The report did not include a reliable method of contact for the inspector. These observations constitute two violations of S.4.B.4.j and S4.B.4.m of the permit.						
Α			S4.B.4.m				\$60.00	\$0
	Copies of inspection reports have not been retained onsite or at easily		S5.G.1.d			1	\$600.00	\$0
	BEST MANAGEMENT PRACTICES							
	General Maintenance Requirements:	During the inspection on 9/16/2024 the inspector observed six sections of	S3 C 2·	_	Ω		\$300.00	\$2,400
	in effective operating condition (i.e., all routine maintenance -and corrective actions are-performed within the timeframes required by the Permit). (Count each failure to timely maintain each control as one violation.)	the silt fence in need of repair: 1) Two silt fences down on Delridge Way SW by the excavator (photo 9 in the inspection report), 2) Delridge Way SW (photo 10) 3) Facing north, toward the intersection of Delridge Way SW and SW Orchard Street (photo 11) 4) Facing north, toward the intersection of Delridge Way SW and SW Orchard Street (photo 12), 5) Facing the intersection of SW Orchard Street and Delridge Way SW (photo 13). Catch basin CB-2 was not cleaned or removed when sediment filled one-third of the available storage (photo 21). The EPA inspector observed the catch	S9.D.11	*	Ü		\$555.50	92,400
		SWPPP, include all information required by the Permit. (Count each control with incomplete information as 1 violation.) Describe the specific controls to be implemented to meet the effluent limits for construction dewatering. For each specific dewatering control measure identified in the SWPPP, include all information required by the Permit. (Count each control with incomplete information as 1 violation.) E Document for sites affected by unforeseen circumstances that delay initiation and/or completion of Vegetative Stabilization the circumstances and the schedule for initiating and completing stabilization. A SWPPP does not describe the procedures for Inspection, Maintenance and Corrective Action. B Description of Inspection, Maintenance and Corrective Action procedures does not include all information required by the Permit. (Count each applicable omission as one violation.) SWPPP does not include documentation that required personnel were, or will be, trained in accordance with Permit requirements. Threatened and Endangered Species Act documentation is not included in SWPPP. SWPPP does not documentation is not included in SWPPP. SWPPP does not document contacts, where applicable, with UIC regulatory authority regarding compliance with SDWA UIC Requirements for Certain Subsurface Stormwater Controls. SWPPP including a regulation of the electronic of included as part of SWPPP. (Count each omission as one violation.) Copy of Not and relevant correspondence, acknowledgement letter received from NeT, or Permit (can be electronic) not included as part of SWPPP. (Count each omission as one violation.) Copy of SWPPP is not retained on site or otherwise easily accessible. A SWPPP modifications do not meet record keeping, approval or notification requirements. (Count each omission as not violation.) INSPECTIONS A Number of Inspections required if performed every 7 days: Number of Inspections required and documented, (Count each failure to inspect and document as one violation.) Inspections not conducted	SWPPP include all information required by the Permit. (Count each control with incomplete information as involution). Describe the specific controls to be implemented for meet the effluent control with incomplete information as involution. Describe the specific controls to be implemented for meet the effluent of the process of the process of the permit of the pe	SWPPP, include all information required by the Permit (Count each control with incorporal information as I visibility of the Control with a control with a construction development of the Permit Count each control with the Contr	SWPPP include all information required by the Fermit. (Court each control with incomplete information and incomplete information in control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each control with incomplete information required by the Permit (Court each incomplete information required by the Permit (Court each incomplete information required by the Permit (Court each incomplete with Court each incomplete information required by the Permit (Court each incomplet	Control with Incomplete inclination as inclination in the Count each control with Incomplete inclination as inclination in the Count with Incomplete inclination and inclination in the Count with Cou	SWPPP, relation all information regarded by the Permit. (Courtle each control and increasing information are submitted to a submitted by a su	SWPPP Control and comments in extended the comments of the com

E	Failure to complete a Corrective Action report when required in accordance with Permit requirements. (Count each missing/deficient	S5.F		\$300.00	\$0
	report as 1 violation.)				
(Corrective Action Reports not properly signed. (Count each failure to sign as one violation.)	5.4.3		\$60.00	\$0
_	Control measures are not properly selected, installed or maintained:				
29	Failure to provide a 50-ft undisturbed natural buffer or equivalent erosion and sediment control when a water of the US is located within 50 feet of	S9.D.1.a; S9.D.4.a		\$600.00	\$0
	the site's earth disturbances. (Count each failure as one violation.)	55.5. n.a			
30	Failure to direct stormwater to vegetated areas to maximize infiltration and filtering (unless infeasible). (Count each failure as one violation.)	S9.D.4.e		\$600.00	\$0
31	Failure to install sediment controls along all perimeter areas of the site				
	that will receive pollutant discharges (or, for linear construction sites				
	where such controls are infeasible, to implement other appropriate practices). (Count each failure as one violation.)				
/	If Common Drainage is 10+ acres	S9.D.4		\$1,200.00	\$0
22	i i	S9.D.4		\$600.00	\$(
32	Failure to minimize sediment trackout in accordance with Permit requirements. (Count each failure as one violation.)	S9.D.2.d		\$600.00	\$0
33	Failure to properly manage stockpiles or land clearing debris piles	S9.D.5.a;		\$600.00	\$(
	composed of sediment and/or soil. (Count each failure as one violation.)	S9.D.5.f			
34	Failure to minimize dust through appropriate application of water or other	S9.D.5.a		\$600.00	\$0
35	dust suppression techniques. (Count each failure as one violation.) Failure to minimize disturbances of "steep slopes". (Count each failure	S9.D.6	+	\$600.00	\$0
	as one violation.)		\bot	·	
36	Failure to preserve native topsoil (unless infeasible). (Count each failure as one violation.)	S9.D.5.i; S9.D.1.b		\$600.00	\$0
37	Failure to minimize soil compaction in areas where final vegetative	S9.D.5.i;	 	\$600.00	\$0
	stabilization will occur or where infiltration practices will be installed.	S9.D.13.b			
38	(Count each failure as one violation.) Failure to protect storm drain inlets by installing inlet protection measures	S9.D.7	+ +	\$600.00	\$0
	that remove sediment from discharges prior to entry into a storm drain				
39	inlet. (Count each failure as one violation.) Failure to use erosion controls and velocity dissipation devices within and	S9.D.3; S9.D.8	+	\$600.00	\$0
33	along the length of any stormwater conveyance channel and at any outlet	09.D.0, 09.D.0		ψ000.00	ĢC
	to slow down runoff to minimize erosion. (Count each failure as one violation.)				
40	Failure to properly design or locate sediment basin or similar	S9.D.3.b;	+	\$1,200.00	\$0
	impoundment in accordance with Permit requirements. (Count each	S9.D.4.f;		* ·,=====	
	failure as one violation.)	S9.D.13.a			
41	Failure to comply with Permit requirements for use of treatment	S9.D.9.b/I;		\$200.00	\$0
	chemicals (Count each failure as one violation.)	S9.D.5.a			
42	Failure to initiate and complete stabilization measures within the	S9.D.8.b;		\$600.00	\$0
	deadlines required by the Permit. (Count each failure as one violation.)	S9.D.5; S9.D.11.b			
		00.D.11.D			
42	Final Stabilization Criteria not askinged as required	S10.A		£1 200 00	\$0
43	Final Stabilization Criteria not achieved as required.	510.A		\$1,200.00	\$0
44	Other needed control measures not properly selected or installed. (Each	S3.B;		\$600.00	\$0
	omission is 1 violation.)	S4.B.1.b; S9.B.2.b			
	Pollution Prevention Requirements				
45	Failure to provide effective controls for equipment and vehicle fueling and	S9.D.2.a;		\$600.00	\$0
	maintenance activities. (Count each failure as one violation.)	S9.D.9.b-c; S1.D.5			
46	Failure to effectively minimize the discharge of pollutants from equipment	S9.D.2.a;		\$600.00	\$0
46	and vehicle washing. (Count each failure as one violation.) NOTE that	S9.D.9.b-c;		\$600.00	\$0
46				\$600.00	\$0
46	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D;		\$600.00	·
	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA.	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7;			
	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D;			
	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7;			
	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA.	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7;		\$600.00	
	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that	\$9.D.9.b-c; \$9.D.2.c; \$1.D.6 \$1.D; \$7; \$9.D.9.a-c			\$0
47	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA.	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c		\$600.00	\$0
47	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that nonallowable, non-stormwater discharges to a storm drain or water are not eligible for an ESA.	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c S9.D.9.f-h; S1.D.1		\$600.00	\$0
47	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that nonallowable, non-stormwater discharges to a storm drain or water are not eligible for an ESA. Failure to provide effective controls for washing applicators/containers for stucco, paint, form release oils, curing compounds or other materials.	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c		\$600.00	\$0
47	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that nonallowable, non-stormwater discharges to a storm drain or water are not eligible for an ESA. Failure to provide effective controls for washing applicators/containers for stucco, paint, form release oils, curing compounds or other materials. (Count each failure as one violation.) NOTE that nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c S9.D.9.f-h; S1.D.1		\$600.00	\$C
48 49	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that nonallowable, non-stormwater discharges to a storm drain or water are not eligible for an ESA. Failure to provide effective controls for washing applicators/containers for stucco, paint, form release oils, curing compounds or other materials. (Count each failure as one violation.) NOTE that nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA.	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c S9.D.9.f-h; S1.D.1		\$600.00 \$1,000.00 \$600.00	sc sc
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48 49 50	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that nonallowable, non-stormwater discharges to a storm drain or water are not eligible for an ESA. Failure to provide effective controls for washing applicators/containers for stucco, paint, form release oils, curing compounds or other materials. (Count each failure as one violation.) NOTE that nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to comply with requirements for application of fertilizers.	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c S9.D.9.f-h; S1.D.1 S1.D.2; S9.D.9.f		\$600.00 \$1,000.00 \$600.00	\$C
48 49	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that nonallowable, non-stormwater discharges to a storm drain or water are not eligible for an ESA. Failure to provide effective controls for washing applicators/containers for stucco, paint, form release oils, curing compounds or other materials. (Count each failure as one violation.) NOTE that nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to comply with requirements for application of fertilizers.	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c S9.D.9.f-h; S1.D.1 S1.D.2; S9.D.9.f		\$600.00 \$1,000.00 \$600.00	\$C
48 49 50	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that nonallowable, non-stormwater discharges to a storm drain or water are not eligible for an ESA. Failure to provide effective controls for washing applicators/containers for stucco, paint, form release oils, curing compounds or other materials. (Count each failure as one violation.) NOTE that nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to comply with requirements for application of fertilizers. Failure to comply with Permit requirements for construction dewatering in order to minimize the discharge of pollutants. (Count each failure as 1 violation.) Use of waters of the US as part of the treatment area is not	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c S9.D.9.f-h; S1.D.1 S1.D.2; S9.D.9.f		\$600.00 \$1,000.00 \$600.00	\$C
48 49 50	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that nonallowable, non-stormwater discharges to a storm drain or water are not eligible for an ESA. Failure to provide effective controls for washing applicators/containers for stucco, paint, form release oils, curing compounds or other materials. (Count each failure as one violation.) NOTE that nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to comply with requirements for application of fertilizers.	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c S9.D.9.f-h; S1.D.1 S1.D.2; S9.D.9.f		\$600.00 \$1,000.00 \$600.00	\$C
48 49 50	and vehicle washing. (Count each failure as one violation.) NOTE that discharges of soaps, solvents or detergents to a storm drain or receiving water are not eligible for an ESA. Failure to implement appropriate controls to prevent/minimize the discharge of pollutants from any of the following: building materials/products; landscaping chemicals and materials; petroleum products and other chemicals; hazardous and toxic waste; construction and domestic wastes; and/or sanitary wastes. (Count each failure as one violation.) NOTE that any nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to provide effective controls for concrete washout. NOTE that nonallowable, non-stormwater discharges to a storm drain or water are not eligible for an ESA. Failure to provide effective controls for washing applicators/containers for stucco, paint, form release oils, curing compounds or other materials. (Count each failure as one violation.) NOTE that nonallowable, non-stormwater discharges to a storm drain or receiving water are not eligible for an ESA. Failure to comply with requirements for application of fertilizers. Failure to comply with Permit requirements for construction dewatering in order to minimize the discharge of pollutants. (Count each failure as 1 violation.) Use of waters of the US as part of the treatment area is not	S9.D.9.b-c; S9.D.2.c; S1.D.6 S1.D; S7; S9.D.9.a-c S9.D.9.f-h; S1.D.1 S1.D.2; S9.D.9.f	No	\$600.00 \$1,000.00 \$600.00	\$0 \$0 \$0 \$0 \$0

	A small business is defined by EPA's Small Business Compliance Policy as: "a person, corporation, partnership, or other entity that employs 100 or fewer individuals (across all facilities and operations owned by the small business)." The number of employees should be considered as full-time equivalents on an annual basis, including contract employees (see 40 CFR 372.3). A full time employee unit is 2000 hours worked per year.					
		Total Expedited Settlement:				\$3,180
	ADJUSTMENT FOR REPEAT VIOLATOR:					_
54	For Repeat Violators, the Expedited Settlement Amount should be adjusted upward using the appropriate Escalation Factor. Enter either 0.25 (1st time Repeat Violator) or 0.5 (2nd or more times) into Column G. Leave this row blank if this is not a Repeat Violator.	Adjustment for Repeat Violator:			\$3,180.00	\$0

\$3,180

*RCA: Requires Corrective Action

Total Expedited Settlement Amount