

EPA ENFORCEMENT ACCOUNTS RECEIVABLE CONTROL NUMBER FORM FOR ADMINISTRATIVE ACTIONS

This form was originated by Wanda I. Santiago for Tim Conway 6/14/18
Name of Case Attorney Date

in the ORC (RAA) at 918-1113
Office & Mail Code Phone number

Case Docket Number CWA-01-2018-0002

Site-specific Superfund (SF) Acct. Number _____

This is an original debt This is a modification

Name and address of Person and/or Company/Municipality making the payment:

Mathew Luxton
Electric Boat Corporation
975 Eastern Boat Corporation
Groton, CT 06430

Total Dollar Amount of Receivable \$ 60,000 Due Date: 7/24/18

SEP due? Yes _____ No Date Due _____

Installment Method (if applicable)

INSTALLMENTS OF:
1st \$ _____ on _____
2nd \$ _____ on _____
3rd \$ _____ on _____
4th \$ _____ on _____
5th \$ _____ on _____

For RHC Tracking Purposes:

Copy of Check Received by RHC _____ Notice Sent to Finance _____

TO BE FILLED OUT BY LOCAL FINANCIAL MANAGEMENT OFFICE:

IFMS Accounts Receivable Control Number _____

If you have any questions call: _____
in the Financial Management Office Phone Number



U. S. ENVIRONMENTAL PROTECTION AGENCY – NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100 (OES04-3)
BOSTON, MA 02109-3912

VIA FIRST CLASS MAIL and EMAIL

June 14, 2018

Daniel Healy, Counsel
Electric Boat Corporation
975 Eastern Point Road
Groton, CT 06430

Re: Electric Boat Corporation/EPA Docket No. CWA-01-2018-0002

Dear Attorney Healy:

Enclosed is a copy of the final, signed, and effective *Consent Agreement and Final Order* in this matter. This CAFO was signed by the Regional Judicial Officer on June 13, 2018, and was filed with the Regional Hearing Clerk today, June 14, 2018. Therefore, according to the Final Order, the Order becomes final on July 13, 2018. Note that the penalty payment is due within 10 days of the date the Order becomes final.

I also enclose copies of my transmittal letter to the Regional Hearing Clerk and a Certificate of Service.

Please let me know if you have any questions. We appreciate your prompt cooperation during the negotiations of this matter.

Sincerely,

A handwritten signature in cursive script that reads "Timothy M. Conway".

Timothy M. Conway
Senior Enforcement Counsel

Enclosures

cc: Alex Rosenberg, Joe Canzano, Sharon DeMeo, Solanch Pastrana Del Valle, EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

RECEIVED

JUN 14 2018

EPA ORC
Office of Regional Hearing Clerk

IN THE MATTER OF)

ELECTRIC BOAT CORPORATION)

75 Eastern Point Road)

Groton, CT 06430)

Respondent)

Proceeding under Section 309(g))

of the Clean Water Act,)

33 U.S.C. § 1319(g))

Docket No: CWA-01-2018-0002

**CONSENT AGREEMENT
AND FINAL ORDER**

Complainant, the United States Environmental Protection Agency, Region 1 (EPA) alleges that Electric Boat Corporation (hereinafter referred to as "Respondent") has violated Section 301 of the Clean Water Act (CWA), 33 U.S.C. § 1311(a).

EPA and Respondent agree that settlement of this matter is in the public interest and that entry of this Consent Agreement and Final Order (CAFO) without further litigation is the most appropriate means of resolving this matter. Pursuant to 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) of EPA's "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, EPA and Respondent agree to simultaneously commence and settle this action by the issuance of this CAFO.

Pursuant to Section 309(g)(1) of the CWA, 33 U.S.C. § 1319(g)(1) and 40 C.F.R. § 22.38(b), EPA has notified the state of Connecticut of this action.

Therefore, before any hearing, without adjudication of any issue of fact or law, upon the record, and upon consent and agreement of EPA and Respondent, it is hereby ordered and adjudged as follows:

I. STATUTORY AND REGULATORY AUTHORITY

1. The CWA is designed to restore and maintain the chemical, physical, and biological integrity of the nation's waters. Section 101(a) of the Act, 33 U.S.C. § 1251(a).

2. To accomplish the objectives of the Act, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into navigable waters except in compliance with the terms and conditions of a permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, and EPA's implementing regulations, found at 40 C.F.R. Part 122.

3. Section 502(5) of the CWA, 33 U.S.C. § 1362(5), defines "person" to include "an individual, corporation, partnership [or] association."

4. Section 502(12) of the CWA, 33 U.S.C. § 1362(12), defines "discharge of a pollutant" to include "any addition of any pollutant to navigable waters from any point source."

5. Section 502(6) of the CWA, 33 U.S.C. § 1362(6), defines "pollutant" to include, among other things, chemical wastes, biological materials, rock, sand, and industrial waste discharged into water.

6. Section 502(14) of the CWA, 33 U.S.C. § 1362(14), defines "point source" to include "any discernible, confined and discrete conveyance . . . from which pollutants are or may be discharged."

7. Section 502(7) of the CWA, 33 U.S.C. § 1362(7), defines "navigable waters" as "the waters of the United States, including the territorial seas."

8. Section 402(p) of the CWA, 33 U.S.C. § 1342(p), requires any stormwater discharge “associated with industrial activity” to be authorized by a National Pollutant Discharge Elimination System (NPDES) permit.

9. Section 308(a) of the CWA, 33 U.S.C. § 1318(a), authorizes the Administrator of EPA to require the owner or operator of any point source to provide such information as the Administrator may reasonably need to carry out the objectives of the CWA, including, among other things, the development and issuance of NPDES permits under Section 402 of the CWA, 33 U.S.C. § 1342.

10. Pursuant to Sections 308 and 402 of the CWA, 33 U.S.C. §§ 1318 and 1342, EPA promulgated stormwater discharge regulations at 40 C.F.R. § 122.26.

11. Forty C.F.R. § 122.26(c)(1) provides that dischargers of stormwater “associated with industrial activity” are required to apply for an individual permit, apply for a permit through a group application, or seek coverage under a general permit.

12. Forty C.F.R. § 122.26(b)(13) defines “storm water” to include stormwater runoff, snow melt runoff, and surface runoff and drainage.

13. Section 402(b) of the CWA, 33 U.S.C. § 1342(b), provides that the EPA Administrator may authorize a state to issue NPDES permits in accordance with the requirements of the CWA. In 1973, the Administrator granted the State of Connecticut the authority to issue NPDES permits. Connecticut’s authority for the issuance of permits is established in Section 22a-430 of Chapter 446k of the Connecticut General Statutes. On October 1, 2002, the Connecticut Department of Energy and Environmental Protection (CTDEEP) issued the 2002 Connecticut General Permit for the discharge of Stormwater Associated with Industrial Activity (“2002 CTMSGP”), which was modified on July 14, 2003, and again on October 1,

2007. Although the 2002 CTMSGP was originally set for expiration on September 30, 2007, it remained in effect until the effective date of the 2011 Connecticut General Permit for the Discharge of Stormwater Associated with Industrial Activity (“2011 CTMSGP”), which was October 1, 2011. On June 14, 2016, CTDEEP reissued without modification the 2011 CTMSGP for two years, until September 2018 (“2016 Reissued CTMSGP”).

14. Section 402(p), 33 U.S.C. § 1342(p), and EPA’s implementing regulation 40 C.F.R. § 122.26(a)(1)(ii), require stormwater discharges “associated with industrial activity” to be authorized by a NPDES permit. Section 3(b) of the 2011 CTMSGP as reissued authorizes the discharge of “stormwater associated with industrial activity” to surface water or to a storm sewer system.

15. Forty C.F.R. § 122.26(b)(14)(ii) specifies that “storm water discharge associated with industrial activity” includes stormwater discharge from facilities classified within Standard Industrial Classification (SIC) Group 373.

16. Under the 2016 Reissued CTMSGP, a facility discharging stormwater “associated with industrial activities” is required to submit a Notice of Intent (NOI), prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), conduct inspections, conduct monitoring and sampling, and meet other requirements. Section 2 of the 2016 Reissued CTMSGP specifies that “industrial activity” includes any activity with primary SIC code 373.

17. Section 309(g) of the CWA, 33 U.S.C. § 1319, provides for the assessment of penalties for violations of Section 301 of the CWA, 33 U.S.C. § 1311, and for violating any condition or limitation in a permit issued under Section 402 of the CWA, 33 U.S.C. § 1342.

II. GENERAL ALLEGATIONS

18. Electric Boat Corporation is a corporation organized under the laws of the State of Delaware with a usual place of business at 75 Eastern Point Road, Groton, Connecticut 06430.

19. As a corporation, Respondent is a “person” within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

20. Respondent owns and operates a facility that assembles submarines at 75 Eastern Point Road, Groton, Connecticut 06430 (the “Facility”).

21. Stormwater runoff from the Facility drains to the Thames River via various stormwater conveyance paths and outfalls.

22. The outfalls are “point source[s]” within the meaning of Section 502(14) of the CWA, 33 U.S.C. § 1362(14).

23. The discharges from these outfalls may contain, without limitation, chemical wastes, biological materials, rock, sand, garbage, and industrial waste which are “pollutant[s]” within the meaning of Section 502(6) of the CWA, 33 U.S.C. § 1362(6).

24. The Thames River is a “water of the United States,” within the meaning of the CWA and the regulations promulgated thereunder that were in effect at the time of Respondent’s activities.

25. On April 19-20, 2017, EPA and Connecticut Department of Energy and Environmental Protection (CTDEEP) staff conducted an industrial stormwater inspection at the Facility to determine the Facility’s compliance with the 2011 CTMSGP and the 2016 Reissued CTMSGP (the “Inspection”). By letter dated July 13, 2017, EPA, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, required Respondent to respond to a set of requests for information. On July 28, 2017, Respondent responded to the set of requests for information.

III. FINDINGS

First Alleged Violation: Failure to Comply with Terms and Conditions of the CTMSGP

26. The foregoing Paragraphs 1 through 25 are incorporated by reference as if fully set forth herein.

27. The 2011 CTMSGP and 2016 Reissued CTMSGP (collectively the "CTMSGP") each include specific requirements for compliance, including the following:

a. Section 5(b)(1) of the CTMSGP, Good Housekeeping, requires that the permittee must maintain a clean, orderly facility in all areas that are exposed to rainfall and are potential sources of pollutants. During the Inspection, EPA observed the following sources of pollutants:

- i. Sediments and/or debris within certain stormwater collection and crane rail systems at Graving Dock 3;
- ii. Waste pipe insulation and metal rust flake waste along a gang-way at Graving Dock 2; and
- iii. Spilled metal grinding waste associated with certain drum dust collector units on Graving Dock 1 and within a few feet of a stormwater catch basin.

Therefore, Respondent was in violation of Section 5(b)(1) of the CTMSGP.

b. Section 5(b)(9)B of the CTMSGP, Dumpsters, requires that the permittee must ensure that all dumpsters, trash compactors, and roll-off containers used to store

waste or recyclable materials are in sound watertight condition and have covers and drain plugs intact, or are in roofed areas that will prevent exposure to rainfall and will not allow dumpster leakage to enter any stormwater drainage system. All covers on dumpsters not under a roof must be closed when dumpsters are not being loaded or unloaded. During the Inspection, EPA observed the following: Waste dumpsters located on Graving Dock 2 without covers and not under cover, waste materials exposed to rainfall, and not being loaded or unloaded, and a waste scrap metal roll-off container with residual waste liquid in the container and on the ground around the container. Therefore, Respondent was in violation of Section 5(b)(9)B of the CTMSGP.

c. Section 5(b)(9) of the CTMSGP, Spill Prevention and Response Procedures, requires that the permittee must minimize the potential for leaks and spills, including, among other things, identifying procedures for containing, reporting and cleaning up spills. These procedures must be provided to the appropriate personnel through employee training along with the necessary equipment to implement a cleanup. At the time of the Inspection, Facility personnel were unable to successfully activate in a timely manner a spill containment valve for Graving Dock 2 designed for containing and minimizing unintentional chemical and wastewater releases and spills from entering the Thames River. Therefore, Respondent was in violation of Section 5(b)(9) of the CTMSGP.

d. Based on EPA's review of Respondent's July 28, 2017 response to EPA's July 13, 2017 Request for Information pursuant to Section 308 of the CWA, 33. U.S.C. § 1318, particularly the Respondent's facility inspection documentation, EPA identified the

following deficiencies under Section 5(b) of the CTMSGP for failing to fully implement and maintain Control Measures to minimize discharge of pollutants to the Thames River from the Facility from the following exterior locations:

- i. Waterfront Area: (1) October 24, 2013, oil spill from an open container unsecured, unattended, and without containment; (2) August 14, 2015, oil hoses not capped resulting in an oil leak and; (3) August 17, 2015, hydraulic unit without proper containment; (4) May 1, 2015, six oil drums placed in area without adequate containment; (5) August 17, 2015, hydraulic oil unit without proper containment; (6) March 31, 2017, seven pallets of oil without adequate containment, and two filled wastewater drums without lid bands and not clearly labeled; (7) August 11, 2016, two roll-off containers not covered to prevent stormwater run-through and contamination, and numerous smaller type containers not covered and left to collect stormwater, become contaminated and likely be dumped out; (8) June 30, 2014, June 17, 2015, and August 14, 2015, lead dust collectors documented to be in disrepair, finally resolved March 11, 2016 following 3rd and 4th request; and (9) August 11, 2016, scrap wood container contains sawdust sweepings and sawdust, metal and other fines, which should not be deposited in scrap collection bins, as most scrap bins allow for stormwater drainage.
- ii. South Yard Area: (1) August 13, 2015, oil leak from work box; (2) August 14, 2015, sawdust being placed in container with drain holes

and sawdust; and (3) August 11, 2016, scrap cutting area dust collector out in the open but grit/insulation not completely removed, not covered, not working at the time and unattended.

- iii. North Yard Area: (1) May 12, 2015, uncovered trash container with drain holes routinely collects waste and contaminates stormwater; (2) August 14, 2015, blast grit on the external building and outside asphalt; (3) August 11, 2016, sawdust collection dumpster no longer in service should be covered to prevent stormwater buildup/contamination, and steel waste drums for outdoor collection of water are not covered to prevent them from filling or overflowing during a storm; and (4) March 13, 2017, roll-off container unattended and open during a rainstorm.

Therefore, Respondent was in violation numerous times with Section 5(b) of the CTMSGP from October 24, 2013.

28. Section 5(e)(1)(B) of the CTMGSP requires all permittees to comply with the benchmarks for the standard parameters specified in Section 5(e)(1)(B) unless otherwise specified in Section 5(f).

29. Section 5(e)(1)(B)(i) and (iv) of the CTMSGP identifies benchmark standards for the following pollutants of concern: Total Zinc is 0.160 milligrams per liter (mg/l), and Total Kjeldahl Nitrogen is 2.30 mg/l; and requires if the average of the 4 semiannual monitoring values for any parameter exceeds the benchmark, the permittee must review the selection, design, installation and implementation of the Control Measures to determine if modifications are necessary to meet the benchmarks, and either make the necessary modifications to Control

Measures and SWPPP and continue semiannual monitoring or make a determination that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice to implement additional control measures or meet the benchmarks.

30. From March 2014 through October 2016, the Respondent continued to report from 11 stormwater discharge monitoring locations monitoring data for Total Zinc with the average value above the Total Zinc benchmark, and from four stormwater discharge monitoring locations monitoring data for Total Kjeldahl Nitrogen with the average value above the Total Kjeldahl Nitrogen benchmark. Respondent failed to make the necessary modifications to Control Measures and SWPPP to meet benchmark standards. Therefore, Respondent was in violation of Section 5(e)(1)(B)(i) and (iv) of the CTMSGP.

31. Section 5(c)(2) of the CTMSGP require the Respondent to develop a SWPPP, and Section 5(c)(2)(D)(i) requires the SWPPP to be representative of current site conditions and to include a site map that shows, among other things, locations of all stormwater conveyances including catch basins, ditches, pipes, and swales as well as the location of any non-stormwater discharges.

32. During the Inspection, EPA observed a difference between the Respondent's stormwater conveyances shown on an April 1, 2001 (amended August 5, 2016) site map and those observed by EPA. These differences included identification of the inlet and outlet pipes for Catch Basin 5-1 and Catch Basin 15-2; a 4-inch outfall pipe that drains stormwater from the Facility's refueling station area to the Thames River (which was not identified by Respondent as a stormwater outfall); and an outdated stormwater conveyance structure around Building 8 north. Therefore, Respondent was/is in violation of Section 5(c)(2)(D)(i) of the CTMSGP.

33. From at least December 2012 through April 2017, each of Respondent's violations of the CTMSGP is a separate and distinct violation of Section 301(a) of the CWA, 33 U.S.C. § 1311(a), for each day on which the violation occurred or continued. In addition, each and every day on which Respondent discharged stormwater from the Facility in violation of the terms and conditions of the CTMSGP is a violation of Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Second Alleged Violation: Unauthorized Discharge of Process Wastewater

34. The foregoing paragraphs 1 through 33 are incorporated by reference as if fully set forth herein.

35. In April 2017, the Respondent discharged industrial process wastewaters from a resin fiberglass type unit operation into Catch Basin 10-2. The discharge contained, among other things, industrial wastes and/or chemical wastes, which are "pollutant[s]" within the meaning of Section 502(6) of the CWA, 33 U.S.C. § 1362(6).

36. Catch Basin CB-10-2 discharges into the Thames River.

37. Section 3(b) of the CTMSGP provides a list of non-stormwater discharges authorized by the Permit. Process wastewaters associated with the Respondent's resin fiberglass type unit operation is not a listed/authorized non-stormwater discharge authorized by the CTMSGP, or any other state or federal permit.

38. By discharging industrial process wastewater into the Thames River without authorization under the CTMSGP, Respondent violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

IV. TERMS OF SETTLEMENT

39. Respondent certifies that it has corrected the alleged violations cited in Paragraphs 26 through 38 of this CAFO and agrees to operate the Facility in compliance with the 2016

Reissued CTMSGP.

40. Respondent stipulates that EPA has jurisdiction over the subject matter alleged in this CAFO and that this CAFO states a claim upon which relief may be granted against Respondent. Respondent hereby waives any defenses it might have as to jurisdiction and venue.

41. Respondent hereby waives its right to a judicial or administrative hearing on any issue of law or fact set forth in this CAFO and waives its right to appeal the Final Order.

42. Without admitting or denying the facts and violations alleged in this CAFO, Respondent consents to the terms and issuance of this CAFO and agrees to the payment of the civil penalty set forth herein.

43. Pursuant to the relevant factors for penalties issued pursuant to Section 309(g)(3) of the CWA, 33 U.S.C. § 1319(g)(3), and taking into account any such matters as justice may require, including Respondent's ability to pay the civil penalty, EPA has determined that it is fair and proper that Respondent pay a total civil penalty in the amount of \$60,000 to resolve the violations alleged in this matter.

44. Respondent shall pay the total penalty amount of \$60,000 for the violations of the CWA set forth herein within ten (10) days of the final date of this CAFO, as described in the Final Order.

45. Respondent shall submit a company, bank, cashier's, or certified check, payable to the order of the "Treasurer, United States of America," referencing the case name and docket number ("*In re Electric Boat Corporation*, Docket No. CWA-01-2018-0002") on the face of the check or wire transfer confirmation. The check should be sent to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MP 63197-9000

Or, Respondent may make payment by electronic funds transfer via:

Federal Reserve Bank of New York
ABA = 021030004
Account = 68010727
SWIFT Address = FRNYUS33
33 Liberty Street
New York, NY 10045
Field Tag 4200 of the Fedwire message should read:
"D 68010727 Environmental Protection Agency"

46. In addition, at the time of payment, Respondent shall simultaneously send notice of the payment and a copy of the check or electronic wire transfer confirmation to:

Wanda I. Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code ORC 04-6
Boston, MA 02109-3912

and

Timothy M. Conway
Senior Enforcement Counsel
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OES 04-3
Boston, MA 02109-3912

47. Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim.

48. In the event that any portion of the civil penalty relating to the alleged CWA

violations is not paid when due without demand, the penalty plus accrued interest shall be payable from the original due date to the date of payment, at the rate of the United States Treasury tax and loan rate in accordance with 31 C.F.R. § 901.9(b)(2). A charge will be assessed to cover the costs of debt collection, including processing and handling costs and attorneys' fees. In addition, a penalty charge of six percent per year, compounded annually, will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. However, should assessment of the penalty charge on the debt be required, it will be assessed as of the first day payment becomes due in accordance with 31 C.F.R. § 901.9(d).

49. The civil penalty under this CAFO and any interest, nonpayment penalties, and other charges described herein shall represent penalties assessed by EPA, and shall not be deductible for purposes of federal, state, or local taxes. Accordingly, Respondent agrees to treat all payments made pursuant to this CAFO as penalties within the meaning of 26 C.F.R. § 1.162-21, and further agrees not to use these payments in any way as, or in furtherance of, a tax deduction under federal, state, or local law.

50. The provisions of this CAFO shall be binding upon Respondent and Respondent's officers, directors, agents, servants, employees, and successors or assigns.

51. Respondent shall bear its own costs and attorneys' fees in this proceeding and specifically waives any right to recover such costs pursuant to the Equal Access to Justice Act, 5 U.S.C. § 504, or other applicable laws.

52. This CAFO constitutes a settlement by EPA of all claims for civil penalties pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), for the violations specifically alleged in this CAFO. Compliance with this CAFO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by EPA, and it is the

responsibility of Respondent to comply with such laws and regulations.

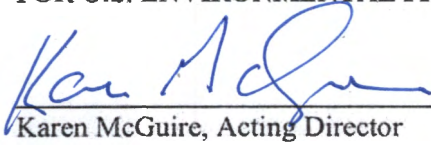
53. This CAFO in no way relieves Respondent or its employees of any criminal liability, and EPA reserves all its other criminal and civil enforcement authorities, including the authority to seek injunctive relief. Nothing in this CAFO shall be construed to limit the authority of the United States to undertake any action against Respondent in response to conditions which may present an imminent and substantial endangerment to the public health, welfare or the environment.

54. Nothing in this CAFO shall be construed as prohibiting, altering, or in any way limiting the ability of EPA to seek any other remedies or sanctions if Respondent violates this CAFO or continues to violate the statutes and regulations upon which the allegations in this CAFO are based, or for Respondent's violation of any other applicable provision of federal, state, or local law.

55. The undersigned representative of the Respondent certifies that he or she is fully authorized by the party responsible to enter into the terms and conditions of this CAFO and to execute and legally bind that party to it.

56. The terms, conditions, and compliance requirements of this CAFO may not be modified or amended except upon the written agreement of EPA and the Respondent, and approval of a Regional Judicial Officer.

FOR U.S. ENVIRONMENTAL PROTECTION AGENCY:



Karen McGuire, Acting Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1

Date: April 9, 2018

FOR RESPONDENT ELECTRIC BOAT CORPORATION:



Matthew S. Luxton, Vice President and General Counsel
Electric Boat Corporation

Date: 04/03/2018

FINAL ORDER

The forgoing consent agreement is hereby approved and incorporated by reference into this Order. The Respondent is hereby ordered to comply with the terms of the above Consent Agreement. All aspects of this Order will become final ("the final date") 30 days from the date it is signed by the Regional Judicial Officer.

Date: _____

6/13/18



LeAnn Jensen

Acting Regional Judicial Officer

U.S. Environmental Protection Agency, Region 1

In re: Electric Boat Corporation/EPA Docket No. CWA-01-2018-0002

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Consent Agreement and Final Order has been sent to the following persons on the date and in the manner noted below:

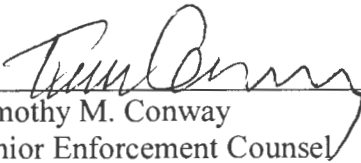
Original and one copy,
hand-delivered:

Ms. Wanda Santiago, Regional Hearing Clerk
U.S. EPA, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3812

Copy, by First Class Mail:

Matthew Luxton, Vice President and General Counsel
Electric Boat Corporation
975 Eastern Point Road
Groton, CT 06430

Date: June 14, 2018



Timothy M. Conway
Senior Enforcement Counsel
U.S. Environmental Protection Agency,
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3812
(617) 918-1705
conway.tim@epa.gov