

**BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 3  
Philadelphia, Pennsylvania 19103**

**FILED**  
May 28, 2026  
10:57 am  
U.S. EPA REGION 3  
HEARING CLERK

<b>IN THE MATTER OF:</b>	)	<b>DOCKET NO.: RCRA-03-2026-0061</b>
	)	
<b>Columbia Woodworking, LLC</b>	)	<b>EXPEDITED SETTLEMENT AGREEMENT AND</b>
<b>935 Brentwood Road, NE</b>	)	<b>FINAL ORDER</b>
<b>Washington, DC 20018</b>	)	
	)	
<b>Respondent,</b>	)	<b>Proceeding under Section</b>
	)	<b>3008 of the Resource Conservation and</b>
	)	<b>Recovery Act, as amended, 42 U.S.C. § 6928</b>
	)	
<b>Columbia Woodworking, LLC</b>	)	
<b>935 Brentwood Road, NE</b>	)	
<b>Washington, DC 20018</b>	)	
	)	
<b>Facility.</b>	)	

**EXPEDITED SETTLEMENT AGREEMENT**

1. Columbia Woodworking, LLC (“Respondent”), and the Acting Director, Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3 (“Complainant”) enter into this Expedited Settlement Agreement (“Agreement”) pursuant to Section 3008 of the Resource Conservation and Recovery Act (“RCRA”), as amended, 42 U.S.C § 6928, and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (“Consolidated Rules of Practice”), 40 C.F.R. Part 22 (with specific reference to 40 C.F.R. §§ 22.13(b), 22.18(b)(2), and (3)). The Administrator has delegated the authority to enter into this Agreement to the Regional Administrator who, in turn, has delegated it to the Complainant.
2. The U.S. Environmental Protection Agency, Region 3 (“EPA”) has jurisdiction over this matter pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, and 40 C.F.R. §§ 22.1(a)(4) and 22.4 of the Consolidated Rules of Practice.
3. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), EPA has authorized the District of Columbia to administer a hazardous waste management program in lieu of the federal hazardous waste management program established under RCRA Subtitle C, 42 U.S.C. §§ 6921-6939g. The provisions of the current authorized District of Columbia Hazardous Waste Management Regulations (“DCHWMR”), codified at 20 DCMR §§ 4000 et seq., have thereby become requirements of RCRA Subtitle C and are enforceable by EPA pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a).
4. On October 10, 2025, EPA sent a letter to the District of Columbia, through the District of Columbia Department of Energy and the Environment (“DOEE”), giving prior notice of this

enforcement action in accordance with Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

5. At its facility, located at 935 Brentwood Road, NE, Washington, DC 20018 (“Facility”), Respondent conducts architectural millwork and custom woodworking. Most recently, on September 19, 2025, Respondent submitted a notification to DOEE that the Facility was a small quantity generator (“SQG”) of hazardous waste at the Facility, and DOEE previously assigned RCRA ID No. DCD983971201.
6. Complainant alleges that, at all times relevant to the allegations described in this Agreement, Respondent was and continues to be a “person,” as defined in Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and 20 DCMR § 4260.1, and at all times relevant to the allegations in this Agreement was the “operator” and the “owner” of a “facility,” described in Paragraph 5, as the terms “facility”, “owner” and “operator” are defined in 40 C.F.R. § 260.10, as incorporated by reference in 20 DCMR § 4260.1.
7. At all times relevant to the allegations described in this Agreement, Respondent “stored” used lacquer thinner and paints with EPA Hazardous Waste Codes D001, D009, D035, F003, and F005, which are “hazardous waste(s)” at the Facility, as the terms “stored” and “hazardous waste(s)” are defined in 40 C.F.R. § 260.10, as incorporated by reference in 20 DCMR § 4260.1.
8. On May 21 & 22, 2025 and May 28, 2025, an EPA representative conducted a Compliance Evaluation Inspection at the Facility to determine compliance with the applicable hazardous waste regulations.
9. Based on the observations during the Inspection and on the information Respondent provided during the inspection, Complainant alleges and finds that Respondent failed to comply with specific requirements of Subtitle C of RCRA, 42 U.S.C. §§ 6921 et seq., its implementing regulations at 40 C.F.R. Parts 262, 264, 265, and the federally-authorized District of Columbia hazardous waste management regulations set forth in the DCHWMR, 20 DCMR §§ 4000 et seq.
10. Complainant has identified the following violations at the Facility:
  - a. On May 21 & 22, 2025 and May 28, 2025, Respondent failed to make a hazardous waste determination for its solid waste, in violation of 20 DCMR § 4260.1 which incorporates by reference 40 C.F.R. § 262.11. During the Inspection, Facility personnel stated that the following hazardous waste streams are discarded in the regular trash: used aerosol cans, used solvent-based paint booth filters and used solvent-contaminated rags.
  - b. On May 21 & 22, 2025 and May 28, 2025, Respondent operated the Facility without a permit, in violation of 20 DCMR § 4270.1, which incorporates by reference 40 CFR §

270.1(b). The following acts or omissions prevented Respondent from meeting the regulatory permit exemption conditions set forth at 20 DCMR § 4262.1, which incorporates by reference 40 CFR § 262.34(d):

- i. Respondent stored containers of hazardous waste at the Facility without marking the containers with the date upon which each period of hazardous waste accumulation began, in violation of 20 DCMR § 4262.1, which incorporates by reference 40 CFR § 262.34(d)(2) that references 40 CFR § 262.34(a)(2). Respondent had four (4) containers of flammable (D001) liquids that were labeled with the words “Hazardous Waste” in its central hazardous waste accumulation area (“CAA”) near the Building 1 Loading Dock. At the time of the inspection, each of the four (4) containers of hazardous waste were not marked with an accumulation start date.
- ii. Respondent failed to label each of the following containers of hazardous waste with the words “Hazardous Waste”, in violation of 20 DCMR § 4262.1, which incorporates by reference 40 CFR § 262.34(d)(2) that references 40 CFR § 262.34(a)(3):
  1. A 2.5-gallon container of flammable (D001) hazardous waste from the paint spray gun cleaning process located in the Finishing Area.
  2. A 5-gallon container of used solvent-contaminated rags from the cleaning and staining processes in the Finishing Area.
- iii. Respondent failed to conduct weekly inspections as specified under 20 DCMR § 4264, which incorporates by reference 40 C.F.R. § 264.174. During the May 21 & 22, 2025 Inspection, the EPA inspector observed that the Facility stores containers of hazardous waste lacquer thinner and paints with EPA Hazardous Waste Codes D001, D009, D035, F003, and F005 at its CAA near the Building 1 Loading Dock. Upon request for the inspection records associated with this CAA, the EPA inspector further observed that the Facility did not conduct weekly inspections for at least 31 weeks between the dates October 16, 2024 to May 27, 2025.
- iv. Respondent failed post emergency information next to the telephone, in violation of 20 DCMR § 4262.1, which incorporates by reference 40 CFR § 262.34(d)(5)(ii)(B) and § 262.34(d)(5)(ii)(C). During the inspection, the EPA inspector observed spill containment procedures posted on flammable storage cabinets in the Finishing Area, but the spill containment procedures did not include the location of fire extinguishers, fire alarms, and the telephone number of the fire department.

11. Complainant and Respondent agree that settlement of this matter for a total penalty of **SIX THOUSAND TWO HUNDRED AND FIFTY DOLLARS (\$6,250.00)** is in the public interest. In calculating this amount, Complainant considered the statutory factors set forth in Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3).
12. Respondent agrees that, within 30 days of the effective date of this Agreement, Respondent shall make a payment of **\$6,250.00** (the Assessed Penalty). Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using one of the electronic payment options provided on the EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions relating to electronic payment options, see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>. Respondent acknowledges that EPA has provided adequate notification that, prior to the Effective Date, in accordance with Executive Order 14247: Modernizing Payments To and From America's Bank Account, EPA ceased accepting paper checks as a form of payment of civil penalties and EPA only accepts specific electronic methods of payments as provided on the above website.
13. Within 24 hours of payment, Respondent shall also send proof of payment (confirmation of credit card or debit card payment, confirmation of wire or automated clearinghouse transfer), by electronic mail to:

Andrew Ma, Enforcement Officer (3ED22)  
U.S. EPA, Region 3  
[ma.andrew@epa.gov](mailto:ma.andrew@epa.gov)

and

Regional Hearing Clerk (3RC00)  
U.S. EPA, Region 3  
[R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)

14. In signing this Agreement, Respondent: admits the jurisdictional allegations in this Agreement; neither admits nor denies the specific factual allegations in this Agreement, except as provided in the jurisdictional admission above; agrees not to contest EPA's jurisdiction with respect to the execution of this Agreement, the issuance of the attached Final Order, or the enforcement the Agreement; expressly waives its right to a hearing on any issue of law or fact in this Agreement and any right to appeal the accompanying Final Order; consents to the issuance of the Agreement and agrees to comply with its terms; agrees to bear its own costs and attorney's fees; and agrees not to deduct for federal tax purposes the civil penalty assessed in this Consent Agreement and Final Order.

15. By its signature below, Respondent certifies, subject to civil and criminal penalties for making a false submission to the United States Government, that (1) the alleged violations have been corrected, and (2) any documentation or information provided to EPA was true and accurate.
16. This Agreement and the attached Final Order constitute a settlement by EPA of its claims for civil penalties for the violations alleged in this Agreement.
17. 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.
18. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. In addition, this settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Sections 22.18(c) and 22.31(a) of the Consolidated Rules of Practice. Further, EPA reserves any rights and remedies available to it under the RCRA, the RCRA regulations promulgated, and any other federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this Agreement, following its filing with the Regional Hearing Clerk.
19. Late payment of the agreed upon penalty may subject Respondent to interest, administrative costs and late payment penalties in accordance with 40 C.F.R. § 13.11.
20. This Agreement is effective upon filing, in accordance with 40 C.F.R. § 22.31(b).
21. The undersigned representative certifies that she/he is fully authorized to execute this Agreement and to legally bind Columbia Woodworking, LLC.
22. As permitted under 40 CFR § 22.6, the Regional Hearing Clerk will serve copies of this Agreement and Final Order by e-mail to the parties at the following valid e-mail addresses: [ma.andrew@epa.gov](mailto:ma.andrew@epa.gov) (for Complainant), and [dominicc@cwcorp.com](mailto:dominicc@cwcorp.com) (for Respondent).
23. By signing this Agreement, Respondent acknowledges that this Agreement and Final Order will be available to the public and represents that, to the best of Respondent's knowledge and belief, this Agreement and Final Order does not contain any confidential business information or personally identifiable information from Respondent.

**For Respondent:** Columbia Woodworking, LLC

Date: 03/19/2026

By:   
\_\_\_\_\_  
Dominic Comella  
Chief Operating Officer

**For Complainant: U.S. Environmental Protection Agency, Region 3**

After reviewing the Agreement and other pertinent matters, I, the undersigned Acting Director of the Enforcement and Compliance Assurance Division of the United States Environmental Protection Agency, Region 3, agree to the terms and conditions of this Agreement and recommend that the Regional Administrator, or his/her designee, the Regional Judicial Officer, issue the attached Final Order.

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[Digital Signature and Date]  
Acting Director  
Enforcement and Compliance Assurance Division

FILED

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HEARING CLERK

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Philadelphia, Pennsylvania 19103

IN THE MATTER OF:

Columbia Woodworking, LLC  
935 Brentwood Road, NE  
Washington, DC 20018

Respondent,

Columbia Woodworking, LLC  
935 Brentwood Road, NE  
Washington, DC 20018

Facility.

)  
) DOCKET NO.: RCRA-03-2026-0061

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) EXPEDITED SETTLEMENT AGREEMENT AND  
) FINAL ORDER

)  
) Proceeding under Section  
) 3008 of the Resource Conservation and  
) Recovery Act, as amended, 42 U.S.C. § 6928

FINAL ORDER

Pursuant to the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (“Consolidated Rules of Practice”), 40 C.F.R. Part 22 (with specific reference to Sections 22.13(b) and 22.18(b)(2) and (3)), the Consent Agreement resolving this matter is hereby ratified and incorporated by reference into this Final Order.

The Respondent is hereby **ORDERED** to comply with all of the terms of the Consent Agreement.

The effective date of the foregoing Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

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[Digital Signature and Date]

Regional Judicial Officer

U.S. EPA - Region 3

