

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY-REGION 7

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219

BEFORE THE ADMINISTRATOR

IN THE MATTER OF)
)
)
THE CITY OF JEFFERSON, MISSOURI)
)
)
Respondent,)
)
)
Proceedings under Section)
309(a)(3) of the Clean Water Act,)
33 U.S.C. § 1319(a)(3))
_____)

Docket No. CWA-07-2014-0050

FINDINGS OF VIOLATION AND
ADMINISTRATIVE ORDER FOR
COMPLIANCE ON CONSENT

I. Preliminary Statement

1. The FINDINGS OF VIOLATION are made and ORDER ON CONSENT (“Order”) is issued by the United States Environmental Protection Agency (“EPA”) to the City of Jefferson, Missouri (“City” or “Respondent”) pursuant to the authority vested in the Administrator of EPA by Section 309(a) of the Clean Water Act (“CWA”), 33 U.S.C. § and 1319(a), as amended. This authority has been delegated by the Administrator of EPA to the Regional Administrator of EPA, Region 7, and further delegated to the Director, Water, Wetlands and Pesticides Division of EPA, Region 7.

2. The Director, Water, Wetlands and Pesticides Division, EPA, Region 7, on behalf of the Administrator of the EPA, together with the City, enter into this Section 309(a)(3) Order for Compliance on Consent in order to achieve compliance with the CWA, 33 U.S.C. § 1251 *et seq.*

3. EPA and the City (“collectively referred to herein as the “Parties”) have negotiated in good faith and have reached a settlement of the issues in this Order.

4. The Parties agree that settlement of the claims alleged in the Allegations of Violation and Order, consisting of the unauthorized discharges occurring between 2009 through the

present, as described in Section III, is fair, reasonable, and in the public interest and entry of this Order is the most appropriate way of resolving the claims alleged herein.

5. By entering into this Order, Respondent (1) consents to and agrees not to contest EPA's authority or jurisdiction to issue or enforce this Order, (2) agrees to undertake all actions required by the terms and conditions of this Order, and (3) consents to be bound by the requirements set forth herein. For the purposes of this Order, Respondent waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this Order, including any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

6. Respondent neither admits nor denies the factual allegations contained in the Allegations of Violation and Order.

II. Statutory and Regulatory Framework

7. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of "pollutants" from a "point source" into a "navigable water" of the United States, except in compliance with, *inter alia*, Section 402 of the CWA, 33 U.S.C. § 1342, defined by Section 502 of the CWA, 33 U.S.C. § 1362.

8. Section 402 of the CWA provides that pollutants may be discharged only in accordance with the terms of an NPDES permit issued pursuant to that Section. To implement Section 402 of the CWA, EPA promulgated regulations codified at 40 C.F.R. Part 122. Under 40 C.F.R. Part 122.1, an NPDES permit is required for the discharge of pollutants from any point source into waters of the United States.

9. Section 402(p) of the CWA, 33 U.S.C. § 1342(p), sets forth requirements for the issuance of NPDES permits for various categories of municipal stormwater discharges, including those by the City which are the subject to this Order.

10. Pursuant to Section 402(p)(6) of the CWA, 33 U.S.C. § 1342(p)(6), EPA promulgated regulations ("Phase II stormwater regulations") at 40 C.F.R. Part 122 setting forth the additional categories of stormwater discharges to be permitted and the requirements of the Phase II program.

11. 40 C.F.R. § 122.26(a)(9)(i)(A) states that on or after October 1, 1994, for discharges composed entirely of stormwater . . . operators shall be required to obtain a NPDES permit . . . if the discharge is from a small municipal separate storm sewer system required to be regulated pursuant to 40 C.F.R. § 122.32.

12. 40 C.F.R. § 122.26(b)(8) defines “municipal separate storm sewer” as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):
 - a. owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States;
 - b. designed or used for collecting or conveying stormwater;
 - c. which is not a combined sewer; and
 - d. which is not part of a POTW as defined at 40 C.F.R. § 122.2.

13. 40 C.F.R. § 122.26(b)(16) defines “small municipal separate storm sewer system,” (“MS4”) in part, as all separate storm sewers that are:
 - a. owned or operated by the United States, a state, city, town, borough, county, parish, district, association, or other public body . . . having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes [. . .];
 - b. not defined as “large” or “medium” municipal separate storm sewer systems pursuant to Paragraphs (b)(4) and (b)(7), or designated under Paragraph (a)(1)(v) of this section.

14. 40 C.F.R. § 122.32(a) provides that a small MS4 is regulated if:
 - a. the small MS4 is located in an urbanized area as determined by the latest Decennial Census by the Bureau of the Census; or
 - b. the MS4 is designated by the NPDES permitting authority, including where the designation is pursuant to §§ 123.35(b)(3) and (b)(4), or is based upon a petition under § 122.26(f).

15. The Missouri Department of Natural Resources (“MDNR”) is the state agency with the authority to administer the federal NPDES program in Missouri pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, the implementing regulations, and a Memorandum of Understanding dated October 30, 1974. EPA maintains concurrent enforcement authority with authorized state programs for violations of the CWA.

16. Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), authorizes the EPA to issue administrative orders to require persons to take those actions necessary to comply with the requirements of the CWA.

III. EPA Allegations

Allegations of Fact and Law

17. The City of Jefferson is a political subdivision of the state organized under the laws of Missouri, and as such is a “person” for purposes of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

18. Respondent operates a stormwater drainage system consisting of, among other things, drain inlets, storm sewers, and outfalls, and as such is a “municipal separate storm sewer” as that term is defined in 40 C.F.R. § 122.26(b)(8).

19. At all times relevant to this Order, Respondent owned and/or operated a “small municipal separate storm sewer system,” as defined by 40 C.F.R. § 122.26(b)(4)(i).

20. Respondent’s small MS4 is located in the Jefferson City, Missouri “urbanized area” as defined by the 2000 Census, and therefore, at all times relevant to this Order, Respondent’s small MS4 is subject to regulation.

21. Respondent’s small MS4 is a “point source” as defined by Section 502(14) of the CWA, 33 U.S.C. § 1362(14).

22. Respondent’s MS4 discharges pollutants into “navigable waters” as defined by Section 502(7) of the CWA, 33 U.S.C § 1362(7).

23. Discharges from Respondent’s small MS4 resulted in the addition of pollutants from a point source to navigable waters, and thus are the “discharges of a pollutant” as defined by Section 502(12) of the CWA, 33 U.S.C. § 1362(12).

24. Respondent’s discharges from a small MS4 required a permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, and 40 C.F.R. § 122.32.

25. MDNR issued a final MS4 Permit, Permit No. MO-R040049 for discharges from Respondent’s small MS4 under the NPDES, General Permit No. MO-R040000. This MS4 Permit was issued on June 13, 2008, and expired on June 12, 2013. However, the permit is administratively extended pursuant to 10 C.S.R. 20-6(10)(E).

26. On November 7-10, 2011, EPA conducted an MS4 program Inspection (hereafter “the MS4 inspection”) under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to evaluate the City’s compliance with its MS4 permit and the CWA.

27. On February 13, 2013, EPA issued a Request for Information regarding the City's MS4 program, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, to further evaluate the City's compliance with its MS4 permit and the CWA. The City submitted a response to the Request for Information on April 15, 2013.

28. As part of the MS4 Inspection and Request for Information described in Paragraphs 26 and 27 above, the City provided to EPA its Storm Water Management Programs Plan 2013-2018 ("SWMP") dated October 10, 2007, revised April 15, 2013.

Allegations of Violation

29. The facts stated in Paragraphs 17 through 28, above, are herein incorporated.

Storm Water Management Program and Plan Violations

30. Part 4.1.11 of the permit requires that the SWMP document shall include interim milestones, measurable goals, an implementation schedule and measures for success.

31. The City's SWMP referenced in Paragraph 28 does not include a description of processes and procedures for each minimum control measure in accordance with the City's MS4 permit, Part 4.1.11.

32. The City's failure to incorporate the required elements of a SWMP, as set forth in Paragraphs 30 and 31 above, is a violation of its permit and, as such, is a violation of Section 301 of the CWA, 33 U.S.C. § 1311(a).

Illicit Discharge Detection and Elimination Violations

33. Part 4.2.3.1.2 of the City's MS4 permit, which addresses the development, implementation and enforcement of a program to detect and eliminate illicit discharges, requires that the City effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the City's MS4. The ordinance should enable the City to inspect private property if an illicit discharge is suspected, as set forth in Part 4.2.3.1.6 of the City's MS4 permit.

34. Parts 4.2.3.1.3.1 through 4.2.3.1.3.3 of the City's MS4 permit, which addresses the necessary elements of the illicit discharge detection and elimination program, requires the City's SWMP referenced in Paragraph 28 to include procedures for locating priority areas, procedures for tracing the source, and for removing the source of an illicit discharge.

35. Part 4.2.3.1.3.5 of the City's MS4 permit requires the City to describe and implement a plan to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

36. Part 4.2.3.1.6 of the City's MS4 permit, which addresses necessary elements of the illicit discharge detection and elimination program, requires the City to inventory, inspect, and have enforcement authority for industries and commercial enterprises within the City's boundary that may contribute pollutants via stormwater to the MS4.

37. The MS4 Inspection referenced in Paragraph 26 and the Request for Information referenced in Paragraph 27 above, reveal that City ordinance or other regulatory method does not provide City personnel proper authority to adequately investigate and eliminate illicit discharges, nor does it include enforcement procedures, including fines.

38. The City's SWMP does not contain an adequate plan for training its employees, as required by Part 4.2.3.1.3.5 of the City's MS4 permit.

39. The City has not complied with Part 4.2.3.1.6 of its MS4 permit, specifically in that it has not adequately conducted industrial inspections.

40. The City's failure to incorporate and implement the required elements in its SMWP, as set forth in Paragraphs 33 through 39, is a violation of its permit and, as such, is a violation of Section 301 of the CWA, 33 U.S.C. § 1311(a).

Construction Site Stormwater Runoff Control Violations

41. Part 4.2.4.1.3 of the City's MS4 permit, which addresses elements of the Construction Site Stormwater Runoff program to reduce pollutants from construction activities, requires the City to develop and implement procedures to consider and review all pre-construction site plans.

42. Part 4.2.4.1.5 of the City's MS4 permit, which addresses elements of the Construction Site Stormwater Runoff program to reduce pollutants from construction activities, requires the City to develop and implement procedures to inspect sites and enforce control measures, including prioritization of site inspections.

43. Part 4.2.4.1.3 of the City's MS4 permit, which addresses the necessary elements of the Construction Site Stormwater Runoff program to reduce pollutants from construction activities, requires the City develop and implement procedures for consideration and review of all pre-construction site plans for potential water quality impacts.

44. Part 4.2.4.1.7 of the City's MS4 permit, which addresses the necessary elements of the Construction Site Stormwater Runoff program to reduce pollutants from construction activities, requires the City to develop procedures to evaluate the success of this minimum control measure.

45. The City's evaluation and review of pre-construction site plans do not include a standard operating procedure, including adequate review of construction activities and their potential impacts to water quality.

46. The City did not adequately evaluate success of the construction site stormwater control minimum control measure.

47. The City's failure to incorporate and implement the required elements in its SMWP, as set forth in Paragraphs 41 through 46 is a violation of its permit and, as such, is a violation of Section 301 of the CWA, 33 U.S.C. § 1311(a).

Post-construction Stormwater Management Violations

48. Part 4.2.5.1 and 4.2.5.1.1 of the MS4 permit requires the City to develop, implement and enforce a program to address the quality of long-term stormwater runoff from new development and redevelopment projects, including a program to ensure that controls are in place to minimize water quality impacts, by reasonably mimicking pre-construction runoff conditions in affected new development and incorporating water quality protection in affected redevelopment projects to the maximum extent practicable, and include a combination of structural and/or non-structural Best Management Practices ("BMPs") appropriate for the City's community.

49. Part 4.2.5.1.2 of the City's MS4 permit, which covers the development, implementation, and enforcement of a program to address post-construction stormwater runoff from new development and redevelopment projects, requires the City to develop an ordinance or other regulatory mechanism to address post-construction runoff to be included in the SWMP document. The permit further states that if the City's ordinance or regulatory mechanism is already developed, the City shall include a copy of the relevant sections with the SWMP document.

50. Part 4.2.5.1.3 of the City's MS4 permit, which covers the development, implementation, and enforcement of a program to address post-construction stormwater runoff from new development and redevelopment projects, requires the City to develop a plan to ensure adequate long-term operation and maintenance of selected BMPs, including types of agreements between the City and other parties.

51. Part 4.2.5.1.4 of the City's MS4 permit, which addresses the development, implementation, and enforcement of long-term stormwater runoff from new development and redevelopment projects to be included in the SWMP, requires the City to locate specific priority areas for this program.

52. Parts 4.2.5.1.5 through 4.2.5.1.5.4 of the City's MS4 permit, which addresses the development, implementation, and enforcement of long-term stormwater runoff from new

development and redevelopment projects to be included in the SWMP, require the City to describe and implement its post-construction program for non-structural BMPs including addressing standards to direct growth, encourage infill development in high density urban areas, education programs for developers and the public about project designs that minimize water quality impact, and other measures to minimize the percentage of impervious area after development and incorporation of designs that provide for a variety of infiltration practices and source control measures.

53. Parts 4.2.5.1.6 through 4.2.5.1.6.2 of the City's MS4 permit, which addresses the development, implementation, and enforcement of long-term stormwater runoff from new development and redevelopment projects to be included in the SWMP, require the City to describe its post-construction program for structural BMPs including practices that provide infiltration, evapotranspiration or re-use such as grassed swales, bioretention cells, cisterns, green roofs, and redevelopment practices such as planter boxes, street retrofits, parking lot infiltration and green roofs.

54. Part 4.2.5.1.7 of the City's MS4 permit which addresses the development, implementation, and enforcement of a program to address long-term stormwater runoff from new development and redevelopment projects, requires the City to evaluate the success of this minimum control measure.

55. The City's SWMP does not adequately describe any appropriate non-structural and structural BMPs, as described in Parts 4.2.5.1.6 through 4.2.5.1.6.2 of the City's MS4 permit.

56. The City's SWMP does not provide adequate language regarding the City's effort to identify priority areas.

57. The City did not adequately evaluate success of the post-construction stormwater management minimum measure.

58. The City's failure to incorporate and implement the required elements in its SWMP, as set forth in Paragraphs 48 through 57 is a violation of its permit and, as such, is a violation of Section 301 of the CWA, 33 U.S.C. § 1311(a).

Pollution Prevention/Good Housekeeping Violations

59. Part 4.2.6.1.2 of the City's MS4 permit, which addresses the development and implementation of a pollution prevention/good housekeeping program, requires the City to develop maintenance BMPs, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to the regulated small MS4, to be included in the SWMP.

60. Part 4.2.6.1.3 of the City's MS4 permit, which addresses the development and implementation of a pollution prevention/good housekeeping program, requires the City to describe and implement controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas the City operates.

61. Parts 4.2.5.1.4 and 4.2.5.1.5 of the City's MS4 permit, which addresses the development and implementation of a pollution prevention/good housekeeping program, require the City to describe and implement procedures for proper disposal of waste from the City's area of jurisdiction, including but not limited to dredged material, accumulated sediments, floatables and other debris.

62. Part 4.2.6.1.6 of the City's MS4 permit, which addresses the development and implementation of a pollution prevention/good housekeeping program, requires the City to develop and implement procedures to ensure that new flood management projects are assessed for impact on water quality.

63. Part 4.2.6.1.7 of the City's MS4 permit, which addresses the development and implementation of a pollution prevention/good housekeeping program, requires the City to develop and implement an employee training program to prevent and reduce storm water pollution from activities such as those related to park and open space maintenance and fleet building maintenance.

64. Part 4.2.6.1.8 of the City's MS4 permit, which addresses the development and implementation of a pollution prevention/good housekeeping program, requires the City to evaluate the success of the pollution prevention/good housekeeping minimum control measure.

65. The City's SWMP did not describe adequate procedures for controls to reduce floatables and other pollutants to the regulated small MS4, as required by Part 4.2.6.1.2 of the City's MS4 permit.

66. The City's SWMP did not describe adequate controls for reducing or eliminating the discharge of pollutants, as set forth in Part 4.2.6.1.3 of the City's MS4 permit.

67. The City's SWMP did not describe adequate procedures for the proper disposal of waste removed from the City's MS4, as set forth in Parts 4.2.6.1.4 and 4.2.6.1.5 of the City's MS4 permit.

68. The City's SWMP did not include adequate procedures to ensure that new flood management projects are assessed for water quality, as set forth in Part 4.2.6.1.6 of the City's MS4 permit.

69. The City's SWMP did not include an adequate employee training program, as set forth by Part 4.2.6.1.7 of the City's MS4 permit.

70. The City did not adequately evaluate success of the pollution prevention/good housekeeping for municipal operations minimum control measure.

71. The City's failure to incorporate and implement the required elements in its SMWP, as set forth in Paragraphs 59 through 70 is a violation of its permit and, as such, is a violation of Section 301 of the CWA, 33 U.S.C. § 1311(a).

IV. Section 309(a) Order for Compliance on Consent

72. Based on the EPA FINDINGS set forth above, and pursuant to Section 309(a)(3) of the CWA, 33 U.S.C. §§ 1318(a) and 1319(a)(3), IT IS HEREBY ORDERED AND AGREED TO:

Respondent agrees to take all measures necessary to comply with its MS4 permit including revision of the SWMP to address all permit requirements required to comply with the MS4 permit by no later than September 1, 2014. Full implementation of the revised SWMP will be completed by Respondent no later than July 31, 2015.

Respondent agrees to preparing and implementing Standard Operating Procedures ("SOPs") to be included within the revision of the SWMP by September 1, 2014, including SOPs for Illicit Discharge Inspection and Remediation, Construction Plan Review, Post-construction Plan Review, Erosion and Sediment Control Inspection, and Street Sweeping Waste Disposal.

Within 30 days of completion of the final scheduled corrective measure, Respondent shall submit a written Certification to EPA with a copy to MDNR, that all corrective measures required pursuant to this Order have been completed.

73. After review of the certification and any supporting information submitted by Respondent, EPA may determine that additional information is needed and/or additional corrective measures or deadlines are appropriate, and may modify this Order or initiate a separate enforcement action, as appropriate. Alternatively, EPA may accept the certification and terminate this Order, pursuant to Paragraph 88, below.

74. The City shall at all times comply with requirements established by the state of Missouri regarding the operation of facilities associated with the City's MS4, including, but not limited to, any requirements for work to be performed by certified or licensed professional engineers, submission and approval of plans and specifications, and construction and operation permitting. In developing plans and schedules required by this Order, the City shall allocate adequate time and resources to comply with applicable state requirements.

V. Reporting

75. *Reporting to EPA and MDNR:* In addition to the submittals required by Paragraph 72 above, the City shall submit to EPA, with a copy to MDNR, semi-annual reports describing the actions the City has taken to comply with the terms of this Order. These reports are due every January 28 and July 28 until termination of this Order pursuant to Paragraph 87 below; the first report is due January 28, 2015. Each report shall include, at a minimum:

- a. MS4 Compliance Progress: A description of all actions taken to comply with the permit and revise the SWMP.

76. All documents required to be submitted to EPA by this Order, shall be submitted by mail to:

Cynthia Sans, or her successor
Water, Wetlands and Pesticides Division
U.S. Environmental Protection Agency - Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

77. A copy of all documents required to be submitted to MDNR by this Order, shall be submitted by mail to:

Paul Dickerson, or his successor
Chief, Water Pollution Compliance and Enforcement Section
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102-0176.

VI. General Provisions

78. Failure to comply with the terms of the Section 309(a)(3) Compliance Order may result in liability for statutory civil penalties under Section 309(d) of the Act, 33 U.S.C. § 1319(d), as modified by 40 C.F.R. Part 19. Should EPA commence an action seeking penalties for violations of this Compliance Order, a United States District Court may impose civil penalties if the court determines that you have violated the Act and failed to comply with the terms of the Order.

Reservation of Rights

79. This Order does not constitute a waiver or a modification of any requirements of the CWA, 33 U.S.C. § 1251 *et seq.*, all of which remain in full force and effect. EPA retains the

right to seek any and all remedies available under Sections 309(b), (c), (d) or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d) or (g), for any violation cited in this Order. EPA reserves the right to enforce the terms of this Order by initiating a judicial or administrative action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319.

80. With respect to matters not addressed in this Order, EPA reserves the right to take any enforcement action pursuant to the CWA, or any other available legal authority, including without limitation, the right to seek injunctive relief, monetary penalties and/or other legal remedies allowed by law.

81. Compliance with the terms of this Order shall not relieve Respondent of liability for, or preclude EPA from, initiating an administrative or judicial enforcement action to recover penalties for any violations of the CWA, or to seek additional injunctive relief, pursuant to Section 309 of the CW A, 33 U.S.C. § 1319.

82. Subject to the limitations of Paragraph 81, above, Respondent reserves the right to contest liability and any penalty sought in any subsequent action filed by EPA to seek penalties for violation of this Order on Consent, and reserves the right to contest liability and/or penalty in any subsequent action filed by EPA for any violations alleged in the Findings, above.

Access and Requests for Information

83. Nothing in this Order shall limit EPA's right to obtain access to, and/or to inspect Respondent's facility, and/or to request additional information from Respondent, pursuant to the authority of Section 308 of the CWA, 33 U.S.C. § 1318, and/or any other authority.

Severability

84. If any provision or authority of this Order, or the application of this Order to Respondent, is held by federal judicial authority to be invalid, the application to Respondent of the remainder of this Order shall remain in full force and effect and shall not be affected by such a holding.

Modification

85. At EPA's sole discretion, extensions of the compliance schedule/deadlines required by this Order may be made by EPA by written notice to Respondent, without further formal amendment to the Order. All other modifications to this Order may only be made by mutual agreement of the Parties, pursuant to a written amendment signed by each Party.

Effective Date

86. This Order shall be effective upon receipt by Respondent of a fully executed copy hereof. All time periods herein shall be calculated therefrom unless otherwise provided in this Order.

Termination

87. This Order shall remain in effect until a written notice of termination is issued by an authorized representative of EPA. Such notice shall not be given until the City has complied with the requirements of Section IV of this Order and demonstrated general compliance as determined by EPA with the terms of its permits.

Signatories

88. The undersigned for each party has the authority to bind each respective Party to the terms and conditions of this Order. The Order may be signed in part and counterpart by each Party.

For the Complainant, United States Environmental Protection Agency, Region 7:

Issued this 21st day of July, 2014.




Karen A. Flournoy
Director
Water, Wetlands and Pesticides Division
U.S. Environmental Protection Agency – Region 7



Melissa Bagley
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency – Region 7

For the Respondent, City of Jefferson City, Missouri:



Signature

7/11/2014

Date

Eric Struempf

Name

Mayor

Title

CERTIFICATE OF SERVICE

I certify that on the date noted below I hand delivered the original and one true copy of this Findings of Violation and Administrative Order for Compliance to the Regional Docket Clerk, United States Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219.

I further certify that on the date noted below I sent a copy of the foregoing Order for Compliance by first class certified mail, return receipt requested, to:

The Honorable Eric Struempf
Mayor, Jefferson City
320 East McCarty Street
Jefferson City, Missouri 65101

and by first class mail to:

Paul Dickerson, Chief, or his successor
Water Pollution Compliance and Enforcement Section
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102-0176.

7/22/14
Date

Kathy Robinson