



REGION 8
DENVER, CO 80202

FILED

Sep 11, 2026

10:55 am

**U.S. EPA REGION 8
HEARING CLERK**

IN THE MATTER OF:

Haddonstone (USA) Ltd

**INDUSTRIAL STORMWATER
EXPEDITED SETTLEMENT
AGREEMENT**

Docket No. CWA-08-2026-0010

This Industrial Stormwater Expedited Settlement Agreement (Agreement) is entered into under the authority of Section 309(g) of the Clean Water Act (Act), 33 U.S.C. § 1319(g), and 40 C.F.R. §§ 22.13(b) and 22.18(b)(2)-(3). The parties to this Agreement are Haddonstone (USA) Ltd (Respondent), which is a “person” within the meaning of Section 502(5) of the Act, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2, and the undersigned U.S. Environmental Protection Agency (EPA) Complainant.

The Complainant alleges that Respondent is responsible for unauthorized discharge(s) of stormwater in violation of Section 301(a) of the Act, 33 U.S.C. § 1311(a), as further described in the attached “Industrial Non-filer Expedited Settlement Worksheet” (“Settlement Worksheet”), which is incorporated herein by reference.

Respondent admits the jurisdictional allegations in the first paragraph of this Agreement. Respondent neither admits nor denies the factual allegations in the Settlement Worksheet. Respondent agrees to pay, and consents to the EPA’s assessment of, an administrative civil penalty of **\$5,000** for the violations alleged in the Settlement Worksheet. Respondent 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). Respondent also waives any rights or defenses that it 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 certifies, subject to civil and criminal penalties for making a false statement to the United States Government, that it has taken the actions necessary to correct the violations alleged in the Settlement Worksheet by either a) developing and implementing a Stormwater Pollution Prevention Plan and submitting to the Colorado Department of Public Health and Environment (CDPHE) all information necessary to obtain applicable industrial stormwater permit coverage

(e.g., a Notice of Intent); or b) acting to meet eligibility requirements for a waiver from industrial stormwater permit requirements as allowed by CDPHE and submitting the relevant forms (such as the No Exposure Certification form), to CDPHE. Additionally, Respondent certifies that any information it has provided to EPA relating to this Agreement, including documentation of the actions taken to correct the violations identified in the Settlement Worksheet, is true, accurate and complete.

Respondent certifies that, within 10 calendar days of the effective date of the Final Order, it will pay the assessed civil penalty in accordance with EPA's "How to Make a Payment" website at <https://www.epa.gov/financial/makepayment>.

Within 24 hours of payment, Respondent shall also email proof of payment to each of the following:

mirabella.althea@epa.gov;
r8_hearing_clerk@epa.gov; and
CINWD_acctsreceivable@epa.gov.

The term "proof of payment" means, as applicable, confirmation of credit card or debit card payment, confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent's name. This penalty is not deductible for federal tax purposes.

Failure by Respondent to pay the assessed penalty in full by the due date may subject Respondent to a civil action to collect the assessed penalty with interest, handling charges, nonpayment penalties, and the United States' enforcement costs for the collection action, including attorney's fees. In any such collection action, the validity, amount, and appropriateness of the penalty shall not be subject to review. Interest and nonpayment penalties will accrue on any amount overdue from the date payment was due. See 33 U.S.C. § 1319(g)(9).

Respondent's full satisfaction of the terms of the Final Order shall not in any case affect the right of the EPA or the United States to pursue appropriate injunctive relief or other equitable relief or criminal sanctions for any violations of law. Respondent's full satisfaction of the terms of the Final Order shall resolve only Respondent's liability for federal civil penalties under Section 309(g) of the Act, 33 U.S.C. § 1319(g), for the violations alleged in the Settlement Worksheet up to May 22, 2026.

This Agreement does not affect Respondent's responsibility to comply with the Act and other applicable federal, state, or local laws, regulations, or permits.

Pursuant to Section 309(g)(4) of the Act, 33 U.S.C. § 1319(g)(4)(A), and 40 C.F.R. § 22.45, the Complainant will provide public notice of this Agreement and a reasonable opportunity for the public to comment prior to seeking issuance of the Final Order. Respondent understands that this Agreement will become publicly available when the EPA initiates the public comment period.

This Agreement is binding on the parties signing below and becomes final 30 days from the date it signed is by the Regional Judicial Officer, unless a petition to set aside this Agreement is filed by a commenter pursuant to Section 309(g)(5) of the Act, 33 U.S.C. §1391(g)(5), following public notice of this Agreement.

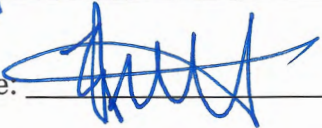
The parties consent to service of the Final Order by email at llamozas.emilio@epa.gov for Complainant and davidw@haddonstone.com for Respondent.

Haddonstone (USA) Ltd, **Respondent:**

Name
(print): DAVID WEST

Title
(print): PRESIDENT

Date: 7/20/2026

Signature: 

United States Environmental Protection Agency:

Emilio Llamozas, Supervisor
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division
Complainant

Date: _____