



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, Pennsylvania 19103

**VIA United Parcel Service and Electronic Mail**

Mr. Robert L. Stickell  
President  
The Washington Marina Company  
1300 Maine Ave., SW  
Washington, DC 20024-2420  
[bstickell@washingtonmarina.com](mailto:bstickell@washingtonmarina.com)

**Re: Administrative Order on Consent  
Docket No. CWA-03-2023-0006DN**

Dear Mr. Stickell:

Enclosed please find the executed Administrative Order on Consent (“AOC”) that you signed on behalf of the Washington Marina Company (“Marina”) on August 30, 2023. By agreeing to this Order, the Marina agreed to do the following (described more fully in Section III of the AOC):

1. Take all actions as and when necessary to comply with the National Pollutant Discharge Elimination System (NPDES) 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (“2021 MSGP”);
2. Within thirty (30) days of the Effective Date of this Order, create and submit to EPA for approval a checklist for Routine Facility Inspections that covers the requirements listed in Section 3 of the 2021 MSGP. Once approved by EPA, Respondent shall incorporate the checklist into quarterly routine site inspections.
3. Within 30 days of the Effective Date of this Order, create and submit to EPA for review a checklist for Quarterly Visual Assessments of Stormwater Discharges under Section 3.2 of the 2021 MSGP. Once reviewed by EPA, Respondent shall incorporate the checklist during into quarterly routine site inspections.
4. Within forty-five (45) days of the Effective Date of this Order, Respondent shall develop a sampling plan that adheres to the requirements in the 2021 MSGP for the Marina’s industrial sector (Section Q/SIC 4493). This includes:
  - a. Identifying outfalls and/or sampling locations at the Marina;
  - b. Developing a Standard Operating Procedure for conducting sampling as required under the 2021 MSGP (including for indicator monitoring and benchmark monitoring) as applicable to the Marina; and
  - c. Electronic reporting of sampling results in adherence to the deadlines in the 2021 MSGP.

5. For a period of one year from the Effective Date of this Order, the Marina shall submit to EPA on a quarterly basis due by the last day of the month following the close of the preceding quarter (no later than January 31, April 30, July 31, and October 31):
  - a. All quarterly self-inspection reports (including Routine Facility Inspection Checklists and Visual Assessment of Stormwater Discharges Checklists) performed by the Marina during the preceding quarter; and
  - b. All quarterly sampling results obtained by the Marina for the preceding quarter.

Your submissions are subject to EPA review and comment.

Thank you for your cooperation on this matter. The effective date of this Order is the date of your receipt of this Order via United Parcel Service mail. Please note that failure to comply with the provisions of the attached Order may subject you to further enforcement action. We strongly urge you to take prompt action to address these issues.

If you have any questions pertaining to this matter, please contact me at (215) 814-2632 or [reinfeld.aviva@epa.gov](mailto:reinfeld.aviva@epa.gov), or Ingrid Hopkins at (215) 814-5437, or [Hopkins.Ingrid@epa.gov](mailto:Hopkins.Ingrid@epa.gov).

Sincerely,

Aviva Reinfeld  
Assistant Regional Counsel

Enclosure

Cc: Mark S. Randall, Esq. ([mark.randall@pondeloths.com](mailto:mark.randall@pondeloths.com))  
Ingrid Hopkins, EPA ([hopkins.ingrid@epa.gov](mailto:hopkins.ingrid@epa.gov))  
Carissa Moncavage, EPA ([moncavage.carissa@epa.gov](mailto:moncavage.carissa@epa.gov))  
Robert Burnett, DOEE ([robert.burnett@dc.gov](mailto:robert.burnett@dc.gov))