



MEMORANDUM

DATE: July 22, 2025

RE: Consent Agreement and proposed Final Order
In the Matter of: Webco Chemical Corporation
CWA-01-2025-0009

FROM: Uzma Bishop-Burney, Enforcement Counsel, EPA Region 1

TO: Michael J. Knapp, Regional Judicial Officer

In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(2), and simultaneously transmitted with this letter, please find a Consent Agreement and proposed Final Order (“CAFO”) settling the above-referenced action. The Consent Agreement has been signed by the parties and is now being submitted to you for approval. **We would appreciate expedited review of this CAFO because the Respondent has already submitted the penalty payment.**

Public notice of this Agreement was provided as required by Sections 309(g)(4)(A) of the Clean Water Act (“CWA”), 33 U.S.C. §§ 1319(g)(4)(A), and 40 C.F.R. § 22.45. The proposed Agreement is being submitted more than 10 days after the close of the public comment period. The Regional Hearing Clerk has reported that there were no comments concerning this proposed action during this period.

Under the terms of the CAFO, the Respondent has agreed to pay a civil monetary penalty of \$25,468 within 30 days of the CAFO’s effective date. The proposed Agreement complies with EPA’s Supplemental Guidance to the 1995 Interim Clean Water Act Settlement Penalty Policy for Violations of the Industrial Stormwater Requirements and the statutory penalty factors described in Sections 309(g)(3) of the Clean Water Act, 33 U.S.C. §§ 1319(g)(3).

Once the proposed Agreement has been signed by you, the fully-executed Agreement will be filed with the Regional Hearing Clerk and will become final 30 days after the date of your signature. Enclosed is a draft certificate of service for use by the Regional Hearing Clerk to serve the parties after you have approved the Agreement.

Enclosures (2) (proposed Agreement; draft Cert. of Service)

Cc (via email): Mark Ruggeri, Owner, Chief Operations Officer Webco Chemical Corporation
Uzma Bishop-Burney, Enforcement Counsel, EPA Region 1
Jeff Kopf, Senior Enforcement Counsel, EPA Region 1
Alex Rosenberg, Senior Inspector, EPA Region 1