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9/16/26

8:34 AM

U.S. EPA REGION 1
HEARING CLERK

Dated by digital signature

VIA EMAIL

Michael J. Knapp
Regional Judicial Officer
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
knapp.michael@epa.gov

Re: *In the Matter of: Student Transportation of America, Inc.*
Docket Number: CWA-01-2026-0054

Dear Mr. Knapp,

In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2), please find enclosed a Consent Agreement and proposed Final Order (“Proposed CAFO”) to simultaneously commence and settle the above-captioned administrative action. The Consent Agreement has been signed by the parties and the proposed Final Order is now being submitted for your review and signature.

The proposed CAFO would require Respondent to pay a settlement penalty of \$325,000. The proposed penalty is consistent with the statutory penalty factors described in Section 309(g)(3) of the Clean Water Act (the “Act”), 33 U.S.C. § 1319(g)(3); the statutory penalty factors described in Section 311(b)(8) of the Act, 33 U.S.C. § 1321(b)(8); EPA’s *Supplemental Guidance to the 1995 Interim Clean Water Act Settlement Penalty Policy for Violations of the Industrial Stormwater Requirements* (Sept. 8, 2016); and EPA’s *Civil Penalty Policy for Section 311(b)(3) and Section 311(j) of the Clean Water Act* (August 1998).

Public notice of this proposed CAFO was provided as required by Section 309(g)(4)(A) of the Act, 33 U.S.C. § 1319(g)(4)(A); Section 311(b)(6)(C)(i) of the Act, 33 U.S.C. § 1321(b)(6)(C)(i); and 40 C.F.R. § 22.45(b). The proposed CAFO is being submitted for your review and approval more than 10 days after the close of the public comment period. No comments concerning this proposed CAFO were received during this period.

Once the proposed Final Order has been signed by you, the fully executed CAFO will be filed with the Regional Hearing Clerk and will become final 30 days after the date of your signature. As shown in Paragraph 63 of the Consent Agreement, the parties have consented to the use of digital signatures and Respondent has consented to electronic service. The parties' email addresses for service are included in the proposed CAFO and in the Proposed Certificate of Service transmitted to the Regional Hearing Clerk.

If you have any questions regarding the proposed CAFO, please contact me at kopf.jeff@epa.gov or (617) 918-1796, and Respondent's counsel, Scott Furman, at sfurman@sprlaw.com or (212) 421-2150.

Sincerely,

Jeff Kopf
Senior Enforcement Counsel
U.S. Environmental Protection Agency, Region 1

Enclosures

Consent Agreement and Proposed Final Order
Proposed Certificate of Service for Regional Hearing Clerk

CC (via email):

Scott E. Furman, SIVE, PAGET & RIESEL P.C.