

**FILED**

**December 23, 2025**

**9:27AM**

**U.S. EPA REGION 7  
HEARING CLERK**

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

BEFORE THE ADMINISTRATOR

IN THE MATTER OF	)	
	)	
Enterprise Precast Concrete of Kansas, LLC	)	Docket No. CWA-07-2025-0109
	)	
Respondent	)	ADMINISTRATIVE ORDER
	)	ON CONSENT
Proceedings under Section 309(a) of the	)	
Clean Water Act, 33 U.S.C. § 1319(a)	)	

**Jurisdiction**

1. This Administrative Order on Consent (“Order”) is issued pursuant to the authority vested in the United States Environmental Protection Agency (“EPA”) by Section 309(a)(3) of the Clean Water Act (“CWA”), 33 U.S. C. §§ 1319 (a)(3), to Enterprise Precast Concrete of Kansas, LLC (“Respondent”).
2. The EPA and Respondent enter into this Section 309(a)(3) Order for the purpose of carrying out the objective of the CWA, 33 U.S.C. § 1251 et seq., to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.”
3. It is the parties’ intent through entering into this Order to address Respondent’s violations of its National Pollutant Discharge Elimination System (“NPDES”) permit for discharges of industrial stormwater . As set forth in this Order, the parties have reached agreement regarding the timeframes for Respondent to attain compliance with Section 402 of the CWA, 33 U.S.C. § 1342 and their NPDES permit.
4. By entering into this Order, Respondent (1) consents to and agrees not to contest the EPA’s authority or jurisdiction to issue and enforce this Order, (2) consents to personal service by electronic mail, (3) agrees to undertake all actions required by the terms and conditions of this Order, and (4) consents to be bound by the requirements set forth herein. Respondent neither admits nor denies the specific factual or legal allegations in this Order, except that Respondent admits the jurisdictional allegations herein. 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 on Consent, including any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

5. Respondent shall bear its own costs and attorney's fees in connection with this proceeding and associated with the implementation or enforcement of this Order, including any costs related to resolution of any dispute arising regarding this Order.

### **Parties**

6. The authority to take action under Section 309(g) of the CWA, 33 U.S.C. § 1319(g), is vested in the Administrator of the EPA. The Administrator has delegated this authority to the Regional Administrator, EPA Region 7, who in turn has delegated the authority under Section 309(g) to the Director of the Enforcement and Compliance Assurance Division of EPA Region 7 with concurrence of the Regional Counsel.

7. Respondent is and was at all relevant times a limited liability company under the laws of the state of Kansas.

### **Statutory and Regulatory Framework**

8. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants, except in compliance with, inter alia, Section 402 of the CWA, 33 U.S.C. § 1342. Section 402 of the CWA provides that pollutants may be discharged in accordance with the terms of a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to that Section.
9. The CWA prohibits the discharge of "pollutants" from a "point source" to a "navigable water," as these terms are defined by Section 502 of the CWA, 33 U.S.C. § 1362.
10. Section 502(7) of the CWA, 33 U.S.C. § 1362(7), defines "navigable waters" as "the waters of the United States, including the territorial seas."
11. To implement Section 402 of the CWA, the EPA promulgated regulations codified at 40 C.F.R. Part 122. Under 40 C.F.R. § 122.1, an NPDES permit is required for the discharge of pollutants from any point source into waters of the United States.
12. Pursuant to Section 402(p) of the CWA, the EPA promulgated regulations setting forth the NPDES permit requirements for stormwater discharges at 40 C.F.R. § 122.26.
13. 40 C.F.R. § 122.21(a) requires dischargers of pollutants from industrial facilities to apply for an NPDES permit.
14. 40 C.F.R. §§ 122.26(a)(1)(ii) and 122.26(c) require dischargers of stormwater associated with industrial activity to apply for an individual permit or to seek coverage under a promulgated stormwater general permit.

15. 40 C.F.R. § 122.26(b)(14) defines “stormwater discharge associated with industrial activity” as “the discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing or raw material storage areas at an industrial plant.”
16. Included in the categories of facilities considered to be engaging in “industrial activity” are facilities under Standard Industrial Classifications (“SIC”) Code 3241 (Cement, Hydraulic). See 40 C.F.R. § 122.26(b)(14)(iii).
17. The Kansas Department of Health and Environment (“KDHE”) is the agency within the state of Kansas that has been authorized by the EPA to administer the federal NPDES program pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, and applicable implementing regulations.
18. Pursuant to Section 402(i) of the CWA, 33 U.S.C. § 1342(i), the EPA retains concurrent enforcement authority with authorized states for violations of the CWA.

**EPA’s General Allegations**

19. Respondent is a “person,” as defined by Section 502(5) of the CWA, 33 U.S.C. § 1362(5).
20. At all times relevant for this action, Respondent is or was the owner and/or operator of the property located at 5525 Kaw Drive Kansas City, Kansas (“Facility”). The Facility operates under SIC 3241.
21. The Facility is on a parcel that is approximately 50 acres located on the north bank of the Kansas River in Kansas City, Kansas. Approximately 30 acres of the facility is usable for its industrial activities, which consist of manufacturing hydraulic cement. Muncie Creek flows through the property and adjacent to the industrial activity area to the Kansas River. The Kansas River flows adjacent the south/southeast perimeter of the Facility’s industrial areas.
22. Stormwater from the site drains to the Kansas River and Muncie Creek as surface runoff and through the below ground the storm sewer system. Muncie Creek confluences with the Kansas River next to the facility. Process wastewater also enters the below ground storm sewer system and discharges to the Kansas River.
23. Muncie Creek flows year-round and is impaired for aquatic life use, bacteria/other microbes, murky water, nitrogen, and phosphorus, and primary contact recreation. Total Maximum Daily Loads (“TMDLs”) are in place for E. coli, nitrate, phosphorus, and total suspended solids.



24. The Kansas Department of Health and Environment lists the Kansas River as impaired for aquatic life use and primary contact recreation and has TMDLs established. TMDLs are in place for E. coli, nitrate, phosphorus, and total suspended solids. The Kansas Department of Wildlife and Parks designates this section of the Kansas River as critical habitat for endangered or threatened species. Under Kansas Water Quality Standards, this section of Kansas River is designated for special aquatic life use.
25. Muncie Creek is a perennial water of the United States within the meaning of Section 502(7) of the CWA, 33 U.S.C. § 1362(7).
26. The Kansas River is an interstate traditionally navigable water and is therefore a “navigable water” within the meaning of Section 502(7) of the CWA, 33 U.S.C. § 1362(7).
27. Stormwater from the Facility contains “pollutants” as defined by Section 502(6) of the CWA, 33 U.S.C. § 1362(6).
28. The Facility has “stormwater discharges associated with industrial activity” as defined by 40 C.F.R. § 122.26(b)(14) and is a “point source” as defined by Section 502(14) of the CWA, 33 U.S.C. § 1362(14).
29. Stormwater runoff from industrial activity at the Facility results in the addition of pollutants from a point source to navigable waters, and thus is the “discharge of a pollutant” as defined by CWA Section 502(12), 33 U.S.C. § 1362(12).
30. Respondent’s discharge of pollutants, including discharges of stormwater associated with an industrial activity, as defined by 40 C.F.R. § 122.26(b)(14), requires a permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.
31. The KDHE issues and implements the Kansas Water Pollution Control General Permit & Authorization to Discharge (“Kansas General Permit”).
32. The Kansas General Permit governs stormwater runoff and process wastewater discharges associated with industrial activities from ready-mixed concrete plants, products plants and their associated facilities.
33. On July 12, 2022, Respondent submitted a Notice of Transfer of Ownership to transfer the Facility’s Kansas General Permit KSG110024. The Kansas General Permit was administratively continued on October 1, 2022 and was effective until April 3, 2025 when it was superseded by the current NPDES permit (“Respondent’s Permit”).
34. On December 8, 2023, Respondent submitted a renewal NOI for permit number KSG110024 to KDHE to maintain the authorization to discharge at the Facility.



35. On June 14, 2024, the EPA performed an Industrial Stormwater Inspection (“EPA Inspection”) of the Facility under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to evaluate Respondent’s compliance with the CWA and transmitted a copy of the report to the facility on September 5, 2024.
36. On March 10, 2025, Respondent responded to the EPA Information Request.

**EPA’s Allegations of Violation**

The paragraphs above are re-alleged and incorporated herein by reference.

**WASTEWATER VIOLATIONS**

**Count 1**

**Failure to Monitor and Report Wastewater Discharge**

37. Part B of the Respondent’s Permit requires the Facility to monitor and report process wastewater discharges at Outfall 001A1 and Outfall 002A1 for Oil and Grease, Total Suspended Solids, Total Recoverable Iron, and pH.
38. Based on the EPA Inspection, Respondent’s response to the EPA Information Request, and other relevant information, Respondent failed to monitor and report process wastewater discharge from Outfalls 001A1 and 002A1 in Quarter 4 of 2022, Quarters 1 and 2 of 2023, Quarters 1 and 2 of 2024, and Quarter 2 of 2025.
39. Respondent’s failures to monitor process wastewater discharge are violations of the terms and conditions of the Permit issued pursuant to Section 402 of the CWA, 42 U.S.C. § 1342, and implementing regulations.

**Count 2**

**Failure to Monitor and Record Wastewater Discharge**

40. Part B of the Respondent’s Permit requires the Facility to monitor and record wastewater discharge flow monthly.
41. Based on the EPA Inspection, Respondent’s response to the EPA Information Request, and other relevant information, Respondent failed to monitor and record the wastewater discharge flow each month from July 2022 to June 2024.
42. Respondent’s failure to monitor and record process wastewater discharge from July 2022 to April 2024 are violations of the terms and conditions of the Permit issued pursuant to Section 402 of the CWA, 42 U.S.C. § 1342, and implementing regulations.

**Count 3**

**Effluent Limitation Violations**

43. Part B of the Permit establishes the discharge limit for pH and Total Suspended Solids (“TSS”), among other parameters. Respondent’s Permit establishes a monthly average range limit of 6.0-9.0 S.U. for pH and a monthly average limit of 100 mg/L for TSS.
44. Respondent’s Discharge Monitoring Reports (“DMRs”) document that Respondent’s discharges exceeded the effluent limitations of their Permit for pH and TSS as follows:

<b>Date</b>	<b>Parameter<sup>1</sup></b>	<b>Value (monthly avg)</b>	<b>Limit (monthly avg)</b>	<b>Outfall</b>
7/28/2022	pH	12.3	6.0-9.0	001A1
7/28/2023	pH	12.4 <sup>2</sup>	6.0-9.0	001A1
7/28/2023	pH	11.8 <sup>2</sup>	6.0-9.0	002A1
11/3/2023	pH	11.6 <sup>3</sup>	6.0-9.0	001A1
8/15/2024	pH	11.9	6.0-9.0	001A1
11/18/2024	pH	11.9	6.0-9.0	001A1
11/18/2024	TSS	235	100	001A1
1/31/2025	pH	12.9	6.0-9.0	002A1
1/31/2025	TSS	987	100	002A1

<sup>1</sup>Units for pH are S.U. and TSS are mg/L.

<sup>2</sup>Three samples were collected at each outfall on the same day. These were averaged to determine the value shown.

<sup>3</sup>Two samples were collected at outfall 001A1 on the same day. These were averaged to determine the value shown.

45. Respondent’s discharge of process wastewater with pH and TSS in excess of permitted limits is a violation of the terms and conditions of the Respondent’s Permit issued pursuant to Section 402 of the CWA, 42 U.S.C. § 1342, and implementing regulations.

**Count 4**

**Failure to Properly Analyze Wastewater Discharge**

46. EPA Regulations at 40 C.F.R. Part 136 and the Permit's Standard Conditions 4 require Respondent to analyze wastewater samples within pH a 15-minute hold time.
47. At all times relevant to this Consent Agreement Final Order and based on the EPA Inspection, Respondent's response to the EPA Information Request, and other relevant information, Respondent failed to analyze wastewater samples for pH per 40 C.F.R. Part 136, within 15 minutes of sample collection.
48. Respondent's failures to properly analyze wastewater are violations of the conditions or limitations of the Permit issued pursuant to Section 402(p) of the CWA, 33 U.S.C. § 1342(p).

**STORMWATER VIOLATIONS**

**Count 5**

**Inadequate SWPPP**

49. Attachment A of the Respondent's Permit requires the Respondent to develop and implement a Stormwater Pollution Prevention Plan ("SWPPP").
50. Part A.1.f and Attachment A.6 of the Permit requires that Respondent re-evaluate and maintain the SWPPP in a timely manner, including if there are changes in design, operations, construction or maintenance that have a significant effect on the potential for the discharge of pollutants or the SWPPP proves to be ineffective in eliminating or minimizing pollutants in the stormwater discharges.
51. Attachment A of the Permit identifies all the required elements of the SWPPP which include but are not limited to: a pollution prevention team, description of potential pollutant sources, measures and controls, comprehensive site compliance evaluation, and monitoring and record keeping requirements.
52. Attachment A.2 of the Permit requires that Respondent include a site map in the SWPPP that identifies the following:
  - a. The outline of drainage area(s) for each stormwater outfall;
  - b. the location of significant materials exposed to precipitation;
  - c. storage tanks; scrap yards and general refuse areas;
  - d. fuel storage and distribution areas; vehicle and equipment maintenance and storage areas;
  - e. loading/unloading areas; waste treatment, storage or disposal areas;



- f. short- and long-term material storage areas (including but not limited to: supplies, construction materials, plant equipment, construction sites, oils, fuels, used and unused solvents, cleaning materials, paint, water treatment chemicals, fertilizers, and pesticides);
  - g. landfills; construction sites; stock piles; major spill or leaks; surface water bodies and existing structural controls measures to reduce pollutants in stormwater runoff (such as bermed areas, grassy swales, etc).
- 53. During the EPA Inspection, EPA observed and documented that the Facility's 2019 SWPPP failed to include or Respondent failed to update the Facility's SWPPP to include, among other things:
  - a. Accurate conditions at the facility;
  - b. Comprehensive site compliance evaluations;
  - c. Complete records like monitoring, inspections, employee training, and maintenance logs; and
  - d. A complete and accurate description of potential pollutant sources, a site map, an inventory of exposed materials, sampling data, and risk identification
- 54. On October 11, 2024, EPA received an updated copy of the SWPPP from the Respondent, which failed to include corrections for all the inadequacies observed and documented in the EPA Inspection Report.
- 55. EPA's review of Respondent's responses to the Inspection Report and EPA Information Request established that the Facility's 2024 revised SWPPP failed to meet the requirements of the Permit due to the following reasons:
  - a. Does not include a complete and accurate site map identifying all required components required by the Permit such as existing structural controls, internal wastewater discharge points, internal storm sewer inlets, collection system infrastructure, and wastewater treatment processes and systems; and
  - b. Part 3.2 of the SWPPP states facility inspections are conducted at a minimum once per year, but the Permit requires minimum frequency of quarterly.
- 56. Based on the EPA Inspection and a review of information provided by Respondent and other relevant information, the Facility's SWPPP was inadequate from the date of the issuance of Respondent's Permit, July 12, 2022, through, at least, October 11, 2024.
- 57. Respondent's failure to develop an adequate SWPPP is a violation of the conditions or limitations of the Permit issued pursuant to Section 402(p) of the CWA, 33 U.S.C. § 1342(p).

**Count 6**

**Failure to Implement SWPPP**

58. Attachment A of the Respondent's Permit requires the Respondent to develop and fully implement a Stormwater Pollution Prevention Plan. The purpose of the SWPPP is to ensure the design, implementation, management, and maintenance of Best Management Practices ("BMPs") in order to reduce the amount of pollutants in stormwater discharges associated with industrial activities at the facility. The SWPPP shall evaluate BMPs from each of three major classes: managerial/administrative structural controls, and non-structural controls.
59. During the EPA Inspection, the inspector observed the following failures to implement good housekeeping and spill prevention practices in accordance with the Permit and SWPPP:
- a. Storm sewer inlets had no BMPs in place or were not using effective measures to minimize or prevent pollutants, such as, petroleum, waste, garbage, aggregates, solids, and floatable debris from discharging.
  - b. Pollutants from industrial activities at the site were present in the stormwater conveyance system showing controls are ineffective to prevent contact with stormwater.
  - c. Open oil containers and other liquid wastes stored exposed to stormwater. The EPA inspector also observed oil containers and other liquid wastes stored with leaks and spills on the outside of the barrel, and not in secondary containment.
  - d. Material handling, storage and other process areas were not maintained in a clean and orderly manner to minimize the potential for waste, garbage and floatable debris in exposed areas.
60. Respondent's failures to install and adequately maintain BMPs are violations of the conditions of the Respondent's Permit issued pursuant Section 402 of the CWA, 42 U.S.C. § § 1342, and implementing regulations.

**Count 7**

**Failure to Conduct and/or Document Quarterly Inspections**

61. Section B of the Permit requires that the permittee shall inspect the system of pollution controls on a quarterly basis and within 24 hours after any event which could reasonably be expected to affect the integrity of the controls (3" rainfall event within 24 hours, unless another intensity storm event is justified by the permittee based on a written record of past performance).

62. Section B of the Permit requires that an inspection report shall be completed for each inspection which shall include: the inspection date, inspection personnel, scope of the inspection, major observations, and any revisions needed in the SWPPP.
63. Based on the EPA Inspection and a review of information provided by Respondent and other relevant information, Respondent either failed to conduct inspections and examinations or was unable to produce stormwater discharge examination, site compliance evaluation, and pollution control inspection records from July 2022 until December 2024.
64. Respondent's failure to conduct and/or document inspections and/or timely take appropriate corrective actions are violations of the conditions or limitations of the Permit issued pursuant to Section 402(p) of the CWA, 33 U.S.C. § 1342(p).

**Order for Compliance on Consent**

65. Based on the EPA Findings set forth above, and pursuant to Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), the EPA hereby ORDERS the Respondent, and the Respondent hereby AGREES, to take the actions described below.

66. Respondent shall take whatever actions are necessary to correct the deficiencies and eliminate and prevent recurrence of the violations cited above, and to come into compliance with all the applicable requirements of its Permit.

67. In accordance with this Order and within ninety (90) days of the Effective Date, Respondent shall submit a work plan approved by a Kansas certified engineer to EPA and KDHE detailing the actions necessary to bring the Facility's wastewater treatment system into compliance with the Permit, including but not limited to effluent limitations, as required under K.A.R. 28-16-160 through 174, Kansas Water Quality Standards, and elimination of any unauthorized detergent, additive, cleanser.

68. The work plan shall include written procedures to ensure the wastewater discharge flow is monitored and logged monthly, and that quarterly visual inspections of wastewater discharge to evaluate compliance with the permit are conducted and reported. The work plan shall also include procedures for collecting representative samples and proper sample analysis, in accordance with 40 C.F.R. Part 136, the Permit, and the CWA.

69. In accordance with this Order and within ninety (90) days of the Effective Date, Respondent shall provide the EPA with an updated and accurate SWPPP for the Facility which shall include:

- a. An accurate list and description of all BMPs currently implemented at the Facility;
- b. An accurate list and description of all additional BMPs required to ensure compliance with the Permit;



- c. Accurate map(s) which depict the location of all implemented BMPs and flow of stormwater discharge from the Facility;
- d. A description of all drainage and belowground conveyance structures; and
- e. Any other element required under Attachment A of the Permit.

70. After review of Respondent's submittals required by this Order, the EPA may provide written comments and suggestions regarding such submittals. Review and comment on the submissions by the EPA does not relieve Respondent of the responsibility to comply with the Permit, the CWA, applicable State law, or this Order.

71. In accordance with this Order, the Respondent shall take all necessary actions within ninety (90) days of the Respondent's submission of a work plan, as outlined in paragraph 69 above, to correct the deficiencies and eliminate and prevent recurrence of the violations cited above, and to come into compliance with all of the applicable requirements of its industrial stormwater Permit.

72. *Completion Report.* Once the work has been completed, Respondent shall submit a completion report to the EPA and KDHE, which shall include photographic evidence, copies of relevant documents, analytical reports of discharges at both outfalls, and a signed statement indicating that the work is complete (hereinafter the "Completion Report"). The Completion Report must be submitted within thirty (30) days after work has been completed and is subject to EPA approval.

73. After review of Respondent's submittals required by this Order, the EPA may determine that additional information is needed and/or additional corrective measures or deadlines are necessary and may modify this Order or initiate a separate enforcement action, as appropriate.

#### **Reports/Submissions**

74. Submittals. All documents required to be submitted to EPA by this Order, including the certification statement below, shall be submitted by electronic mail to:

Hannah Lewis  
Lewis.Hannah@epa.gov  
U.S. Environmental Protection Agency Region 7  
Enforcement and Compliance Assurance Division  
11201 Renner Boulevard  
Lenexa, Kansas 66219

75. Electronic submissions to the EPA will be deemed submitted on the date they are transmitted electronically. Any report, notification, certification, or other communication that cannot be submitted electronically to the EPA shall be submitted in hard copy to the address provided above.

76. All documents required to be submitted pursuant to this Order shall also be submitted by electronic mail to KDHE to the address provided below:

William Carr  
William.carr@ks.gov  
Kansas Department of Health and Environment  
1000 SW Jackson Street  
Topeka, Kansas 66612

77. Upon EPA's determination that Respondent has completed all tasks required pursuant to this Order, Respondent shall submit to EPA a Certification of Compliance and Request for Termination of this Order. Such certification and request shall include:

- a. A certification that Respondent has maintained compliance with this Order for the term of this Order; and
- b. all necessary documentation, including photo documentation as appropriate, to support a finding that Respondent has complied with this Order.

### **General Provisions**

#### **Effect of Compliance with the Terms of this Order for Compliance**

78. Respondent's failure to comply with the terms of this Section 309(a)(3) Administrative Order on Consent 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 the 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 Respondent has violated the Act and failed to comply with the terms of the Order.

79. Compliance with the terms of this Order shall not relieve Respondent of liability for, or preclude the 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 CWA, 33 U.S.C. § 1319.

80. 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. The 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. Issuance of this Order shall not be deemed an election by the EPA to forgo any civil or criminal action to seek penalties, fines, or other appropriate relief under the CWA for any violation whatsoever.

**Access and Requests for Information**

81. Nothing in this Order shall limit the 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**

82. If any provision or authority of this Order, or the application of this Order to Respondent, is held by federal judiciary 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.

**Effective Date**

83. The terms of this Order shall be effective and enforceable against Respondent on the Effective Date, which is the date this Order is signed by the EPA.

**Modification**

84. At the EPA's sole discretion, extensions of the compliance schedules / deadlines required by this Order may be made by the EPA by written notice to Respondent, without further formal amendment to the Order. The EPA's consent for a requested extension will not be unreasonably withheld. 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.

**Termination**

85. This Order shall remain in effect until a written notice of termination is issued by an authorized representative of the EPA.



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

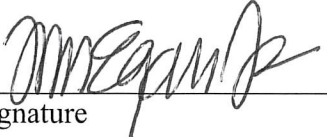
\_\_\_\_\_  
Date


\_\_\_\_\_  
David Cozad  
Director  
Enforcement and Compliance Assurance Division


\_\_\_\_\_  
Date


\_\_\_\_\_  
Angela Stillwagon  
Assistant Regional Counsel  
Office of Regional Counsel

**For the Respondent, Enterprise Precast Concrete of Kansas, LLC:**

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Name

  
\_\_\_\_\_  
Title

## **CERTIFICATE OF SERVICE**

I certify that on the date noted below I delivered a true and correct copy of this Findings of Violation and Administrative Order for Compliance on Consent by electronic mail to:

Regional Hearing Clerk:

Amy Gonzales  
U.S. Environmental Protection Agency  
R7\_Hearing\_Clerk\_Filings@epa.gov

Representatives for Complainant:

Angela Stillwagon  
Office of Regional Counsel  
U.S. Environmental Protection Agency Region 7  
stillwagon.angela@epa.gov

Hannah Lewis  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency Region 7  
Lewis.Hannah@epa.gov

Carrie Venerable  
U.S. Environmental Protection Agency Region 7  
National Experienced Workforce Solutions

I further certify that on the date below I sent a true and correct copy of this Findings of Violation and Administrative Order for Compliance on Consent by certified mail, return receipt requested to:

Representative(s) for Respondent:

Autumne Hovde, Esq.  
Risk & Compliance Manager, Enterprise Properties, Inc.  
ahovde@enterprise-properties.com

Date: \_\_\_\_\_

Signature: \_\_\_\_\_