

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

FILED

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U.S. EPA REGION 1
HEARING CLERK

IN THE MATTER OF

Student Transportation of America,
Inc.

Respondent

Proceeding under Section 309(g)(2)(B)
and Section 311(b)(6)(B)(ii)
of the Clean Water Act,
33 U.S.C. §§ 1319(g)(2)(B),
1321(b)(6)(B)(ii)

DOCKET NO: CWA-01-2026-0054

ADMINISTRATIVE CONSENT
AGREEMENT AND FINAL ORDER

The United States Environmental Protection Agency (“EPA”), Region 1 enters into this Consent Agreement and Final Order (“CAFO”) with Student Transportation of America, Inc. (“Respondent”), for the purpose of resolving alleged violations of Sections 301(a) and 311(j) of the Clean Water Act (“CWA”), 33 U.S.C. §§ 1311(a), 1321(j), as well as the Oil Pollution Prevention regulations set forth at 40 C.F.R. Part 112.

Statutory and Regulatory Authority

1. EPA takes this action under the authority of Sections 309(g)(2)(B) and 311(b)(6)(B)(ii) of the CWA, 33 U.S.C. § 1319(g)(2)(B) and 1321(b)(6)(B)(ii), as amended by the Oil Pollution Act of 1990, and in accordance with applicable delegations and 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) of EPA’s *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits*, set forth at 40 C.F.R. Part 22.

2. Pursuant to Section 309(g)(1) of the CWA, 33 U.S.C. § 1319(g)(1), and 40 C.F.R. § 22.38(b), EPA has notified the States of Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont of this action.

General Allegations

3. The CWA is designed to restore and maintain the chemical, physical, and biological integrity of the nation's waters. Section 101(a) of the CWA, 33 U.S.C. § 1251(a).

4. To accomplish the objectives of the CWA, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person except in compliance with a permit issued pursuant to Section 402 or 404 of the CWA, 33 U.S.C. §§ 1342 or 1344, and EPA's implementing regulations, found at 40 C.F.R. Part 122.

5. Respondent is a corporation, incorporated in the State of Delaware, with its headquarters located at 3349 Highway 138, Building A, Suite C, Wall Township, New Jersey and, therefore, is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.

6. The following companies are subsidiaries of Respondent: Five Star Transportation, Inc., Ledgemere Transportation, Inc., Ocean State Transit, LLC, Student Transportation of New Hampshire, Inc., Student Transportation of Vermont, Inc., Tewksbury Transit, Incorporated and All-Star Transportation, LLC.

7. Respondent's subsidiaries operate the facilities listed in Attachment 1 (the "Facilities"). The Facilities provide school bus transportation services throughout the New England states.

8. Respondent's subsidiaries conduct maintenance activities, fueling activities, or both at the Facilities and discharge stormwater from the Facilities, where EPA has alleged unauthorized stormwater discharges.

Stormwater

9. Pursuant to Sections 308 and 402 of the CWA, 33 U.S.C. §§ 1318 and 1342, EPA has promulgated stormwater discharge regulations at 40 C.F.R. § 122.26.

10. Forty C.F.R. § 122.26(b)(13) defines “storm water” to include stormwater runoff, snow melt runoff, surface runoff, and drainage.

11. Section 402(p) of the CWA, 33 U.S.C. § 1342(p), and implementing regulation 40 C.F.R. § 122.26(a)(1)(ii), require that facilities discharging stormwater associated with industrial activity obtain a permit. Under 40 C.F.R. § 122.26(c)(1), dischargers of stormwater associated with industrial activity must apply for an individual permit or seek coverage under a general permit.

12. Facilities that engage in industrial activities within the categories set out in 40 C.F.R. § 122.26(b)(14) must obtain permit authorization for stormwater discharges.

13. Pursuant to 40 C.F.R. § 122.26(b)(14)(viii), facilities operating under Standard Industrial Classification (“SIC”) Code 4151 engage in industrial activity.

14. The United States Department of Labor defines SIC Code 4151 as establishments primarily engaged in operating buses to transport pupils to and from school.

15. Respondent has indicated that the primary SIC Code for each of the Facilities is SIC Code 4151.

16. Stormwater from the facilities specified in Attachment 1 as having “unauthorized stormwater discharges,” contain pollutants, as defined in Section 502(6) of the CWA, 33 U.S.C. § 1362(6).

17. Stormwater from the facilities specified in Attachment 1 as having “unauthorized stormwater discharges,” flows through channels, ditches, pipes, or other discrete conveyances,

all of which are point sources, as defined in Section 502(14) of the CWA, 33 U.S.C. § 1362(14).

18. Stormwater from the Facilities discharges into “navigable waters” which is defined in Section 502(7) of the CWA, 33 U.S.C. § 1362(7) as “waters of the United States,” a term that is defined in 40 C.F.R. § 120.2.

19. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), makes unlawful the discharge of pollutants to navigable waters of the United States except, among other things, in compliance with the terms and conditions of a National Pollutant Discharge Elimination System (“NPDES”) permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

20. Under the 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (“2021 MSGP”), a facility that discharges stormwater associated with industrial activity is required to submit a Notice of Intent (“NOI”) to be covered under the MSGP, prepare a Stormwater Pollution Prevention Plan (“SWPPP”), and implement the SWPPP, including conducting inspections, conducting monitoring and sampling, and meeting other MSGP requirements.¹

21. Part 8.P of the 2021 MSGP provides sector-specific requirements for Land Transportation and Warehousing facilities, which are classified as Sector P under the 2021 MSGP and which include facilities operating under SIC Code 4151. *See* 2021 MSGP, Appendix D, Table D-1.

22. EPA alleges that by discharging stormwater associated with industrial activity from specified facilities listed in Attachment 1, during certain wet-weather events during the

¹ The 2021 MSGP applies in Massachusetts and New Hampshire. The other New England states where the Facilities are located have approved NPDES programs and have each issued statewide multi-sector general permits for stormwater discharges associated with industrial activity. The obligations related to the discharge of stormwater associated with industrial activity that are described in this Consent Agreement apply equally in states covered by the federal 2021 MSGP and in states with state-issued industrial stormwater permits, which are NPDES permits. References to the 2021 MSGP should be understood to also refer to analogous provisions in the state-issued MSGP permits.

time periods described in Attachment 1, to waters of the United States without authorization under the 2021 MSGP, any other NPDES permit, or a valid No Exposure Certification, Respondent violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Process Wash Water

23. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person except in compliance with a permit issued pursuant to Section 402 or 404 of the CWA, 33 U.S.C. §§ 1342 or 1344, and EPA’s implementing regulations, found at 40 C.F.R. Part 122.

24. In response to an information request sent by EPA to the Respondent on March 4, 2023, Respondent indicated that it discharged process wash water associated with bus washing operations, from the facilities specified in Attachment 1 as having “unauthorized process water discharges” at certain times during the time periods specified for each facility, into waters of the United States or into storm drains that discharge into waters of the United States.

25. EPA alleges that by discharging process wash water from the facilities described in Paragraph 24 into waters of the United States without authorization under any NPDES permit, from at least October 1, 2024 to October 1, 2025, Respondent violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

26. Section 309(g) of the CWA, 33 U.S.C. § 1319, provides for the assessment of penalties for violations of Section 301 of the CWA, 33 U.S.C. § 1311, and for violations of any condition or limitation in a permit issued under Section 402 of the CWA, 33 U.S.C. § 1342. The Federal Civil Penalties Inflation Adjustment Act of 1990 as amended through 2016 (“FCPIAA”), and the FCPIAA’s implementing regulations as promulgated and updated by EPA at 40 C.F.R. Part 19 (most recently at 90 Fed. Reg. 1375, 1377 (Jan. 8, 2025)), together adjust those penalties

to account for inflation.

Oil Pollution Prevention Regulations

27. Pursuant to the authority in Section 311(j) of the CWA, 33 U.S.C. § 1321(j), the Oil Pollution Prevention Regulations (40 C.F.R. Part 112) establish procedures to prevent the discharge of oil from non-transportation onshore facilities into the waters of the United States or adjoining shorelines. Owners or operators of onshore facilities that due to their location could reasonably be expected to discharge oil in “quantities that may be harmful” into the waters of the United States must, among other things, prepare and fully implement a Spill Prevention Control and Countermeasure Plan (“SPCC Plan”) as required by 40 C.F.R. § 112.3(a).

28. The facilities listed in Attachment 1 that are located in Hollis, New Hampshire and Salem, New Hampshire are each an “onshore facility,” as defined in Section 311(a)(10) of the CWA, 33 U.S.C. § 1321(a)(10), and 40 C.F.R. § 112.2.

29. The Hollis, New Hampshire facility described in Paragraph 28 was required to prepare and implement an SPCC Plan and failed to prepare and implement an SPCC Plan from June 1, 2019 to June 5, 2025, in violation of Section 311(j) of the CWA, 33 U.S.C. § 1321(j), and 40 C.F.R. Part 112.

30. The Salem, New Hampshire facility described in Paragraph 28 was required to prepare and implement an SPCC Plan and failed to prepare and implement an SPCC Plan from December 1, 2024 to January 22, 2026, in violation of Section 311(j) of the CWA, 33 U.S.C. § 1321(j), and 40 C.F.R. Part 112.

31. Section 311(b)(6) of the CWA, 33 U.S.C. § 1321(b)(6), provides for the assessment of penalties for violations of Section 311(j) of the CWA, 33 U.S.C. § 1321(j), and the Oil Pollution Prevention regulations, found at 40 C.F.R. Part 112. The FCPIAA, and the

FCPIAA's implementing regulations as promulgated and updated by EPA at 40 C.F.R. Part 19 (most recently at 90 Fed. Reg. 1375, 1377 (Jan. 8, 2025)), together adjust those penalties to account for inflation.

Findings of Violations

Unauthorized Discharges of Stormwater

32. Paragraphs 1 through 31 are incorporated herein by reference.

33. Respondent discharged stormwater into waters of the United States from the facilities specified in Attachment 1 as having "unauthorized stormwater discharges," without authorization under any NPDES permit, during certain storm events that occurred during the time periods specified for each facility in Attachment 1.

34. Each such unpermitted stormwater discharge constitutes a separate violation of Section 301 of the Clean Water Act. 33 U.S.C. § 1311.

Unauthorized Discharges of Process Water

35. Paragraphs 1 through 34 are incorporated herein by reference.

36. Respondent discharged process wash water into waters of the United States from the facilities specified in Attachment 1 as having "unauthorized process water discharges," without authorization under any NPDES permit, during certain bus washing activities that occurred during the time periods specified for each facility in Attachment 1.

37. Each such unpermitted pollutant discharge constitutes a separate violation of Section 301 of the Clean Water Act. 33 U.S.C. § 1311.

Failure to Prepare and Implement an SPCC Plan in Violation of the Oil Pollution Prevention Regulations

38. Paragraphs 1 through 37 are incorporated herein by reference.

39. From June 1, 2019, when Respondent acquired the Hollis facility, to June 5, 2025

and from December 1, 2024, when the Respondent acquired the Salem facility, to January 22, 2026, Respondent failed to prepare and implement an SPCC Plan.

40. Respondent's failures to prepare and implement SPCC Plans for the two facilities listed in the previous Paragraph constitute violations of Section 311(j) of the CWA, 33 U.S.C. § 1321(j).

Consent Agreement

41. EPA and Respondent agree that settlement of this cause of action is in the public interest and that entry of this CAFO without litigation is the most appropriate means of resolving this matter. Therefore, before taking any testimony, upon the pleadings, without adjudication of any issue of fact or law, and upon the consent and agreement of the parties, it is hereby ordered and adjudged as follows:

42. Consistent with 40 C.F.R. § 22.18(b)(2), Respondent admits the jurisdictional allegations set forth in this CAFO, and neither admits nor denies the factual or non-jurisdictional allegations set forth in this CAFO. Respondent waives any defenses it might have as to jurisdiction and venue.

43. Respondent waives the right to a hearing under Section 309(g)(2)(B) and 311(b)(6)(B)(ii) of the CWA, 33 U.S.C. § 1319(g)(2)(B), 1321(b)(6)(B)(ii), and to any appeal of the Final Order in this matter under Sections 309(g)(8)(B) and 311(b)(6)(G)(ii) of the CWA, 33 U.S.C. § 1319(g)(8)(B), 1321(b)(6)(G)(ii). Respondent consents to the issuance of a Final Order without further adjudication.

44. By signing this consent agreement, Respondent waives any rights or defenses that Respondent 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 waive any right to challenge the lawfulness of the Final Order accompanying the Consent Agreement.

45. Pursuant to Sections 309(g)(3) and 311(b)(8) of the CWA, 33 U.S.C. § 1319(g)(3), 1321(b)(8), and taking into account the particular facts and circumstances of this case with reference to relevant statutory penalty criteria and the applicable penalty policies, EPA has determined that it is consistent with the CWA to assess a civil penalty of \$315,000 for the violations of Section 301 of the CWA, 33 U.S.C. § 1311, alleged in this CAFO, and a civil penalty of \$10,000 for the violations of Section 311 of the CWA, 33 U.S.C. § 1321, alleged in this CAFO.

46. Respondent agrees to pay a total civil penalty in the amount of \$325,000 (“Assessed Penalty”) which Respondent consents to pay within 30 days of the date the Final Order ratifying this CAFO is filed with the Regional Hearing Clerk (“Filing Date”).

47. Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions, see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>.

48. When making a payment, Respondent shall:

a. Identify the payment with Respondent’s name (*i.e.*, “Student Transportation of America, Inc.”) and the docket number of this CAFO, CWA-01-2026-0054.

b. Concurrently with any payment or within 24 hours of any payment,

Respondent shall serve proof of such payment to the following persons:

Wanda Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
Via electronic mail to:
r1_hearing_clerk_filings@epa.gov

and

Jeff Kopf, Senior Enforcement Counsel

U.S. Environmental Protection Agency, Region 1
Via electronic mail to:
kopf.jeff@epa.gov

and

U.S. Environmental Protection Agency
Cincinnati Finance Center
Via electronic mail to:
CINWD_AcctsReceivable@epa.gov

“Proof of payment” means, as applicable, confirmation of credit card or debit card payment, or 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.

49. Interest, Charges, and Penalties on Late Payments. Pursuant to 33 U.S.C. §§ 1319(g)(9), 1321(b)(6)(H), 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this CAFO, the entire unpaid balance of the Assessed Penalty and all accrued interest shall become immediately due and owing, and EPA is authorized to recover the following amounts.

- a. Interest. Interest begins to accrue from the Filing Date. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. Interest will be assessed at prevailing rates, per 33 U.S.C. §§ 1319(g)(9) and 1321(b)(6)(H). To protect the interests of the United States the rate of interest is set at the IRS standard underpayment rate. Any lower rate would fail to provide Respondent

adequate incentive for timely payment.

- b. Handling Charges. Respondent will be assessed monthly a charge to cover EPA's costs of processing and handling overdue debts. If Respondent fails to pay the Assessed Penalty in accordance with this CAFO, EPA will assess a charge to cover the costs of handling any unpaid amounts for the first thirty (30) day period after the Filing Date. Additional handling charges will be assessed every thirty (30) days, or any portion thereof, until the unpaid portion of the Assessed Penalty as well as any accrued interest, penalties, and other charges are paid in full.
- c. Late Payment Penalty. A late payment penalty of six percent (6%) per annum, will be assessed monthly on all debts, including any unpaid portion of the Assessed Penalty, interest, penalties, and other charges, that remain delinquent more than ninety (90) days. Any such amounts will accrue from the Filing Date.

50. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Consent Agreement, EPA may take additional actions. Such actions may include, but are not limited to, the following.

- a. Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R. §§ 13.13 and 13.14;
- b. Collect the debt by administrative offset (*i.e.*, the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States

government), which includes, but is not limited to, referral to the IRS for offset against income tax refunds, per 40 C.F.R. Part 13, Subparts C and H.

- c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with EPA or engaging in programs that EPA sponsors or funds, per 40 C.F.R. § 13.17.
- d. Per 15 U.S.C. § 2615(a), the Attorney General bringing a civil action in the appropriate district court to recover the full remaining balance of the Assessed Penalty, in addition to interest and the amounts described above, pursuant to 33 U.S.C. § 1319(g)(9). In any such action, the validity, amount, and appropriateness of the Assessed Penalty shall not be subject to review.

51. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.

52. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Consent Agreement shall not be deductible for purposes of federal taxes.

General Provisions

53. The provisions of this CAFO shall apply to, and be binding on, Respondent and Respondent's officers, directors, successors, and assigns. The civil penalty provided under this CAFO, and any interest, nonpayment penalties, and charges described in this CAFO, shall represent penalties assessed by EPA within the meaning of 26 U.S.C. § 162(f) and are not tax deductible for purposes of federal, state, or local law. Accordingly, Respondent agrees to treat all payments made pursuant to this CAFO as penalties within the meaning of 26 C.F.R. § 1.162-21, and further agrees not to use those payments in any way as, or in furtherance of, a tax deduction

under federal, state, or local law.

54. This CAFO does not constitute a waiver, suspension, or modification of the requirements of the CWA or any regulations or permits promulgated thereunder. Payment of the penalty pursuant to this CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged herein through the effective date of this CAFO.

55. This CAFO in no way relieves Respondent or its employees of any criminal liability, and EPA reserves all of its other criminal and civil enforcement authorities, including the authority to seek injunctive relief and the authority to undertake any action against Respondent in response to conditions which may present an imminent and substantial endangerment to the public health, welfare, or the environment.

56. Nothing in this CAFO shall be construed as prohibiting, altering, or in any way limiting the ability of EPA to seek any other remedies or sanctions available by virtue of Respondent's violation of this CAFO or of the statutes and regulations upon which this CAFO is based, or for Respondent's violation of any applicable provision of law.

57. Except as described in Paragraph 49 above, the parties shall bear their own costs and fees in this action, including attorney's fees, and specifically waive any right to recover such costs from the other party pursuant to the Equal Access to Justice Act, 5 U.S.C. § 504, or other applicable laws.

58. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, EPA is required to annually send to the IRS, a completed IRS Form 1098-F ("Fines, Penalties, and Other Amounts") with respect to any court order or settlement agreement (including administrative settlements) that require a payor to pay an aggregate amount that EPA reasonably believes will be equal to, or in excess of, \$50,000 for the payor's violation of any law or the investigation or

inquiry into the payor's potential violation of any law, including amounts paid for "restitution or remediation of property" or to come "into compliance with a law." EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (*i.e.*, a copy of IRS Form 1098-F). Respondent's failure to comply with providing IRS Form W-9 or Tax Identification Number ("TIN"), as described below, may subject Respondent to a penalty, per 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1. To provide EPA with sufficient information to enable it to fulfill these obligations, Respondent shall complete the following actions as applicable.

- a. Respondent shall complete an IRS Form W-9 ("Request for Taxpayer Identification Number and Certification"), which is available at <https://www.irs.gov/pub/irs-pdf/fw9.pdf>.
- b. Respondent shall therein certify that its completed IRS Form W-9 includes Respondent's correct TIN or that Respondent has applied and is waiting for issuance of a TIN.
- c. Respondent shall email its completed Form W-9 to EPA's Cincinnati Finance Center at Chalifoux.Jessica@epa.gov, on or before the date that Respondent's penalty payment is due, pursuant to Paragraph 46 of the CAFO, or within 7 days should the order become effective between December 15 and December 31 of the calendar year. EPA recommends encrypting IRS Form W-9 email correspondence.
- d. In the event that Respondent has certified in its completed IRS Form W-9 that it does not yet have a TIN but has applied for a TIN, Respondent shall provide EPA's Cincinnati Finance Center with Respondent's TIN, via email, within

five (5) days of Respondent's receipt of a TIN issued by the IRS.

59. As of the date of Respondent's signature to this Consent Agreement, Respondent certifies that, to its knowledge, the Facilities are in compliance with the CWA and regulations promulgated thereunder.

60. Respondent's obligations under the CAFO shall end when it has paid in full the scheduled civil penalty, and any interest or nonpayment penalties, and submitted the documentation required by this CAFO.

61. The terms, conditions, and requirements of this CAFO may not be modified or amended except upon the written agreement of all parties, and approval of the Regional Administrator or the Regional Administrator's properly authorized delegee.

62. Each undersigned representative of the parties to this Consent Agreement certifies that the representative is fully authorized by the party represented to enter into the terms and conditions of this CAFO and to execute and legally bind that party to it.

63. Respondent agrees to acceptance of both (a) EPA's digital or an original signature on this CAFO and (b) service of the fully executed CAFO on Respondent by mail or electronically by email at the following address: sfurman@sprlaw.com. EPA agrees to acceptance of Respondent's digital or an original signature on this CAFO.

64. Respondent understands that its mailing or email address may be made public when the CAFO and certificate of service are filed and uploaded to a searchable database.

FOR STUDENT TRANSPORTATION OF AMERICA, INC.



Sign Name

Date: 7/29/26

Gregg Stinson

Print Name

Executive Vice-President , Eastern Business Group

Title

FOR U.S. ENVIRONMENTAL PROTECTION AGENCY:

James Chow, Director
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 1

Date: _____

FINAL ORDER

1. EPA has provided a thirty-day opportunity for public notice and comment on this proposed CAFO, pursuant to Sections 309(g)(4)(A) of the CWA, 33 U.S.C. § 1319(g)(4)(A), and 311(b)(6)(C)(i), 33 U.S.C. § 1321(b)(6)(C)(i), and 40 C.F.R. § 22.45(b). In addition, EPA has consulted with the States listed in Paragraph 2 of the Consent Agreement in this matter consistent with Section 309(g)(1) of the CWA, 33 U.S.C. § 1319(g)(1).

2. The foregoing Consent Agreement is hereby ratified and incorporated by reference into this Final Order.

3. Respondent is hereby ordered to comply with the terms of the above Consent Agreement, which will become final 30 days from the date the Regional Judicial Officer transmits the Final Order to the Regional Hearing Clerk, unless a petition to set aside the order is filed by a commenter pursuant to Section 309(g)(4)(C) and 311(b)(6)(C)(iii) of the CWA, 33 U.S.C. § 1319(g)(4)(C), 33 U.S.C. § 1321(b)(6)(C)(iii), and 40 C.F.R. Part 22.

Michael J. Knapp
Regional Judicial Officer
U.S. Environmental Protection Agency, Region 1

Date: _____

Attachment 1 to Consent Agreement and Final Order

EPA Docket No. CWA-01-2026-0054

Five Star Transportation, Inc. (3 Facilities in Massachusetts)

- 241 Attucks Lane, Hyannis, Massachusetts (unauthorized stormwater discharges from 6/1/2021 to 3/4/2025)
- 730 Fuller Road, Chicopee, Massachusetts (unauthorized stormwater discharges from 6/1/2021 to 4/29/2024)
- 2 Industrial Drive, South Hadley, Massachusetts (unauthorized stormwater discharges from 2/1/2022 to 3/7/2025)

Ledgemere Transportation, Inc. (4 Facilities in Maine)

- 62 Goddard Road, Lewiston, Maine (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 100 Cyro Drive, Sanford, Maine (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 658 Sanford Road, Wells, Maine (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 1025 U.S. Route 1, York, Maine (unauthorized process water discharges from 10/1/2024 to 10/1/2025)

Ocean State Transit, LLC (4 Facilities in Rhode Island)

- 97 Commercial Way, East Providence, Rhode Island (unauthorized stormwater discharges from 2/3/2021 to 2/3/2026)
- 6 Black Plain Rd., Exeter, Rhode Island, (unauthorized stormwater discharges from 6/30/2021 to 6/30/2026)
- 45 Fairgrounds Road, West Kingston, Rhode Island (unauthorized stormwater discharges 8/4/2020 to 8/4/2025)
- 529 Switch Road, Wood River Junction, Rhode Island (unauthorized stormwater discharges from 1/2/2021 to 1/2/2026)

Student Transportation of New Hampshire, Inc. (13 Facilities in New Hampshire)

- 62 East Union Street, Goffstown, New Hampshire (unauthorized stormwater discharges from 6/1/2021 to 8/1/2025) (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 5 White Avenue, Bedford, New Hampshire (unauthorized stormwater discharges from 6/1/2021 to 8/1/2025) (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 103 Route 107, Epsom, New Hampshire (unauthorized stormwater discharges from 6/1/2021 to 8/1/2025) (unauthorized process water discharges from 10/1/2024 to 10/1/2025)

- 58 Carding Mill Road, Weare, New Hampshire (unauthorized stormwater discharges from 6/1/2021 to 8/1/2025) (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 41 Industrial Park Drive, Pelham, New Hampshire (unauthorized stormwater discharges from 6/1/2021 to 8/1/2025) (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 8 Muzzey Road, Hollis, New Hampshire (unauthorized stormwater discharges from 6/1/2021 to 8/1/2025) (failure to prepare and implement an SPCC Plan from 6/1/2019 to 6/5/2025)
- 534 Daniel Webster Highway, Merrimack, New Hampshire (unauthorized stormwater discharges from 6/1/2021 to 10/3/2025)
- 2345 State Route 114, Bradford, New Hampshire (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 574 Mammoth Road, Building G, Suite 14, Londonderry, New Hampshire (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 364 Hancock Road, Peterborough, New Hampshire (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 7 Wallace Street, Rochester, New Hampshire (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 47 Emery Street, Portsmouth, New Hampshire (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 51 Lowell Road, Salem, New Hampshire (failure to prepare and implement an SPCC Plan from 12/1/2024 to 1/22/2026)

Student Transportation of Vermont, Inc. (4 Facilities in Vermont)

- 132 Randbury Road, Rutland, Vermont (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 1796 Route 14, White River Junction, Vermont (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 202 Mainelli Road, Middlebury, Vermont (unauthorized process water discharges from 10/1/2024 to 10/1/2025)
- 79 Precast Road, Milton, Vermont (unauthorized process water discharges from 10/1/2024 to 10/1/2025)

Tewksbury Transit, Incorporated (1 Facility in Massachusetts)

- 555 Whipple Road, Tewksbury, Massachusetts (unauthorized stormwater discharges from 10/1/2021 to 3/7/2025)

All-Star Transportation, LLC (3 Facilities in Connecticut)

- 40 Farnum Road, Lakeville, Connecticut (unauthorized stormwater discharges from 4/8/2020 to 4/8/2025)

- 7 Dodd Road, New Milford, Connecticut (unauthorized stormwater discharges from 4/8/2020 to 4/8/2025)
- 591 North Main Street, Seymour, Connecticut (unauthorized stormwater discharges from 9/15/2020 to 9/15/2025)