



FILED

9/8/26

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U.S. EPA REGION 1
HEARING CLERK

EXPEDITED SETTLEMENT AGREEMENT

Docket Number: CWA-01-2026-0029, NPDES PERMIT No. GIS002762

Continental Scrap Metal, LLC (“Continental Scrap Metal”) of Wolcott, Connecticut (“Respondent”) is a “person,” within the meaning of Section 502(5) of the Clean Water Act (the “Act”), 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.

Attached is an “Expedited Settlement Worksheet” (“Settlement Form”), which is incorporated by reference. By its signature, Complainant (“EPA”) finds that Respondent is responsible for violating Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311, by failing to fully comply with the terms and conditions of the 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, during the time frame described in the Settlement Form.

EPA finds, and Respondent admits, that EPA has jurisdiction over this matter pursuant to Section 309(g) of the Act, 33 U.S.C. § 1319(g), and 40 C.F.R. Part 22. Respondent neither admits nor denies the specific factual allegations in the first two paragraphs of this Expedited Settlement Agreement (“Agreement”).

EPA is authorized to enter into this Agreement under the authority vested in the Administrator of EPA by Section 309(g)(2)(A) of the Act, 33 U.S.C. § 1319(g)(2)(A), and by 40 C.F.R. § 22.13(b). EPA and Continental Scrap Metal (together, the “Parties”) enter into this Agreement to settle the civil violations alleged in this Agreement for a penalty of **\$17,156**. Respondent consents to the assessment of this penalty and waives the right to: (1) contest the findings specified in the Settlement Form; (2) a hearing pursuant to Section 309(g)(2) of the Act, 33 U.S.C. § 1319(g)(2); and (3) appeal pursuant to Section 309(g)(8), 33 U.S.C. § 1319(g)(8). By signing this 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 also waives any right to challenge the lawfulness of the Final Order accompanying the Agreement.

Additionally, Respondent certifies, subject to civil and criminal penalties for making a false statement to the United States Government, that the Respondent has addressed the alleged violations identified in the Settlement Form or has obtained a time frame in writing from EPA by which Respondent has agreed to correct such alleged violations. Furthermore, Respondent agrees that consistent with Section 162(f)(1) of the Internal Revenue Code, 26 U.S.C. § 162(f)(1), Respondent will not deduct penalties paid under this Agreement for federal tax purposes.

Within 10 days after this Agreement becomes final, Respondent agrees to submit payment using any payment method provided at: <https://www.epa.gov/financial/makepayment>. Respondent shall email proof of payment to Cristeen Schena, EPA Region 1, at: schena.cristeen@epa.gov, and to the Regional Hearing Clerk, EPA Region 1 at: R1_Hearing_Clerk_Filings@epa.gov.

This Agreement settles EPA’s civil penalty claims against Respondent for the alleged Clean Water Act violations specified in this Agreement. EPA does not waive its rights to take any enforcement action against Respondent for any other past, present, or future civil or criminal violation of the Act or of any other federal statute or regulation. EPA does not waive its right to issue a compliance order for any uncorrected alleged violations described in the Settlement Form. EPA has determined this Agreement to be appropriate.

Respondent agrees to acceptance of the Complainant’s: i. digital or an original signature on

In the Matter of: Continental Scrap Metal, LLC Docket No.: CWA-01-2026-0029
Expedited Settlement Agreement

this Agreement; and ii. service of the fully executed Agreement on the Respondent by mail or electronically by email at the email address provided under Respondent's signature. Respondent understands that the mailing or email address may be made public when the Agreement and Certificate of Service are filed and uploaded to a searchable database. Complainant agrees to acceptance of the Respondent's digital or original signature on this Agreement.

Prior to requesting that an EPA Regional Judicial Officer issue the Final Order, EPA will provide public notice of this Agreement and a reasonable opportunity for the public to comment on it. EPA will address any comments on this Agreement in accordance with Section 309(g)(4) of the Act, 33 U.S.C. § 1319(g)(4), and 40 C.F.R. § 22.45. EPA has consulted with the State of Connecticut in this matter consistent with Section 309(g)(1) of the Act 33 U.S.C. § 1319(g)(1).

This Agreement is binding on the Parties signing below and becomes final 30 days from the date that a signed copy of the Final Order is transmitted from the Regional Judicial Officer to the Regional Hearing Clerk unless a petition to set aside this Agreement is filed by a commenter pursuant to Section 309(g)(5) of the Act, 33 U.S.C. § 1319(g)(5), following public noticing of this Agreement.

APPROVED BY EPA:

James Chow, Director
Enforcement and Compliance Assurance Division

APPROVED BY RESPONDENT:

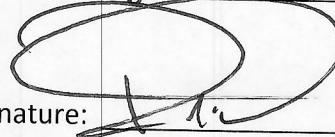
Name (print):

Robert A. S. LA

Title (print):

owner

Signature:



Date:

7-10-2026

Provide Respondent's or Respondent's representative's email address for electronic service below:

rob@continentalscrap.com

FINAL ORDER: More than 40 days have elapsed since the issuance of public notice pursuant to Section 309(g)(4)(A) of the Act, 33 U.S.C. § 1319(g)(4)(A), and EPA has received no comments concerning this matter.

Having determined that this Agreement is authorized by law, IT IS SO ORDERED:

Michael J. Knapp
Regional Judicial Officer

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1 - 5 Post Office Square, Boston MA 02109
EXPEDITED SETTLEMENT Worksheet
Docket No. CWA-01-2026-0029

Docket Number: CWA-01-2026-0029				
			Site Factors	
Site Name: Continental Scrap Metals LLC Site Address: 1275 Wolcott Road, Wolcott CT 06716 Lat/Long: 41.621681, -72.969749 CT DEEP NPDES Permit ID: GIS002762 Inspection Date: July 8, 2024		Acres of Exposure	4	
		Full Time Employees	6	
		Environmental Harm	Med	
		Sector	Sector E Scrap Recycling Facilities	
		Receiving Water Quality	Med	
Permit Section Violation (2021 CT DEEP ISGP)		Magnitude	Penalty Amount	Length of Violation
Site Operations	5(b) Control Measures: 5(b)(1) Failure to maintain Good Housekeeping Practices; 5(b)(9)(A) and 5(b)(9)(B) Failure to ensure all dumpsters, compactors, roll-offs are watertight and have covers and/or provide secondary containment of chemicals	Significant or > 25%	\$2,813	3/6/2024, 7/8/2024: oil observed in pond. 7/8/2024: no secondary containment to open containers with fluids.
	5(b)(10) Failure to Conduct Annual Stormwater Training	Significant or > 25%		
Monitoring & Recordkeeping	5(d)(1) and 5(d)(2) Failed to conduct inspections	≥ 50%	\$2,813	10/1/2021 - 7/8/2024
	5(e)(1)(A)(1) Quarterly Visual Assessment of Stormwater Discharges	< 5%	\$281	1/1/2024 - 7/8/2024
	5(e) and 5(f) Failure to conduct General and Sector Specific Monitoring	≥ 50%	\$7,031	3/1/2022 - 7/8/2024
	5(e)(1)(F) Effluent Limitation Monitoring			
	5(e)(1)(D) Impaired Waters Monitoring			
	5(c) Stormwater Pollution Prevention Plan (SWPPP) failure to update SWPPP	Significant or 25% ≤ 50%	\$4,219	10/1/2021 - 9/2024
		Total	\$17,156	

*The "Magnitude" column reflects the severity and/or length of time of the violations observed and documented by the Inspector at the time of the Inspection and/or based on additional information.