



REGION 3

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**U.S. EPA REGION 3
HEARING CLERK**

VIA ELECTRONIC MAIL

Mr. Robert L. Stickell, President
The Washington Marina Company
1300 Maine Avenue SW
Washington, D.C. 20024-2420
bstickell@washingtonmarina.com

**Re: Administrative Order on Consent
The Washington Marina Company
Docket No. CWA-03-2023-0006DN**

Dear Mr. Stickell:

On September 21, 2023, the United States Environmental Protection Agency, Region 3 ("EPA") issued an Administrative Order on Consent ("Order"), Docket No. CWA-03-2023-0006DN, to the Washington Marina Company ("Marina") to take actions necessary to comply with the Marina's National Pollutant Discharge Elimination System ("NPDES") 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity ("2021 MSGP").

Per the requirements of the Order, the Marina timely submitted a checklist for Routine Facility Inspections that covers the requirements listed in Section 3 of the 2021 MSGP, and a checklist of Quarterly Visual Assessments of Stormwater Discharges under Section 3.2 of the 2021 MSGP, within 30 days of the Effective Date of the Order, on October 20, 2023. In accordance with the Order at Sections 49(a)-(b), EPA reviewed and approved the Routine Facility Inspection Checklist and the Visual Assessment of Stormwater Discharges Checklist and approved them for the Marina's immediate use on February 9, 2024.

Per the requirements of the Order, and within 45 days of the Effective Date of the Order, on November 4, 2023, the Marina submitted a sampling plan that adheres to the requirements in the 2021 MSGP for the Marina's industrial sector (Section Q/SIC 4493). In accordance with the Order at Section 49(c), the Sampling Plan was to include: (i) identifying outfalls and/or sampling locations at the Marina, (ii) the development of a Standard Operating Procedure for conducting sampling, as required under the 2021 MSGP (including for indicator monitoring and benchmark monitoring) as applicable to the Marina and (iii) electronic reporting of sampling results, in adherence to the deadlines in the 2021 MSGP. The EPA reviewed and provided comments on the Sampling Plan on February 9, 2024. On March 7, 2024 the Marina provided an updated Sampling Plan addressing the EPA's comments.

Per the requirements of the Order, for a period of one year from the Effective Date of the Order, the Marina was to submit to EPA on a quarterly basis due by the last day of the month following the close of the preceding quarter (no later than January 31, April 30, July 31, and October 31): (a) all quarterly self-inspection reports (including Routine Facility Inspection Checklists and Visual Assessment of Stormwater Discharges Checklists) performed by the Marina during the preceding quarter; and (b) all quarterly sampling results obtained by the Marina for the preceding quarter. Order at Paragraph 50. The Marina timely submitted quarterly reports on April 30, 2024 (Q1-2024), July 26, 2024 (Q2-2024), October 28, 2024 (Q3-2024), January 24, 2025 (Q4-2024), April 29, 2025 (Q1-2025).

At this time, the EPA has determined that the Marina has completed all of the requirements of the Order, and the Order is therefore terminated, effective immediately, per Section VII ("Termination and Satisfaction"), Paragraph 67 of the Order.

The Washington Marina Company remains responsible for ongoing compliance with the 2021 MSGP and the Clean Water Act. Please note that any future noncompliance with the Clean Water Act, including repeated noncompliance, could result in the initiation of further review and action pursuant to the Federal enforcement provisions set forth in Section 309 of the CWA, 33 U.S.C. Section 1319.

Thank you for your cooperation in this matter. If you have questions regarding any of the above, please contact Aviva Reinfeld, Assistant Regional Counsel at (215) 814-2632 or reinfeld.aviva@epa.gov.

Sincerely,

Andrea Bain
Acting Director
Enforcement & Compliance Assurance Division

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