

59. Within sixty (60) days of the Effective Date of the AAOC, the Respondent shall provide to EPA for review and approval a Corrective Action Plan (“CAP”), which meets the requirements set forth in this AAOC. The CAP shall include, at a minimum, plans and a schedule for implementing corrective actions to address the following to return to compliance with the CWA:
- a. A plan and schedule for the construction of a new sewer line (the “Sewer Line”) along Puddledock Road from the Red Hill Facility to tie in with the Prince George collection system approximately one mile from the Facility at an existing pump station located at the Puddledock Place Apartments, which plan and schedule shall include any ancillary upgrades and improvements as may be required by Prince George County.
 - b. A plan and schedule for removal and closure of the existing wastewater treatment facility in accordance with closure requirements of VPDES Permit No. VA0028258, Part 1, Section C.12. Such plan and schedule shall take effect once the Sewer Line becomes operational.
 - c. A plan for operation and maintenance of the Sewer Line. Premised on Red Hill’s intent to transfer the Sewer Line to Prince George County, Red Hill shall also develop a plan and schedule for contacting Prince George County regarding utility conveyance, and a firm process for entering into an agreement with Prince George County regarding the operation and maintenance of the Sewer Line.
 - d. An interim plan to maintain the existing wastewater treatment facility and conduct active maintenance under direction of a consultant for the duration of the project to assure durable compliance with the CWA.
 - e. A report of infiltration and inflow (“I&I”) work on the collection system in the Red Hill Mobile Home Park completed prior to submission of the CAP, and a plan and schedule for implementation of remaining I&I work.
 - f. Termination of the current VPDES Permit No. VA0028528 following completion of the Sewer Line and submission of a completed WWTP closure plan, approvable by the Agencies.
60. The CAP shall include monthly updates on the work completed in the preceding month. Monthly reporting shall include a firm statement of timeliness and compliance with project date benchmarks and firm estimate of project completion by percentage. The schedule to implement the remaining corrective actions identified in the CAP shall not exceed 18 months from the approval of the CAP.
61. EPA will review the CAP and make a determination as to completeness based on the requirements described in Paragraphs 59 and 60, above. If EPA determines that the CAP is not complete or adequate, EPA shall notify Respondent in writing and Respondent shall resubmit an updated CAP within thirty (30) days of Respondent’s receipt of EPA’s notice. Upon a determination of completeness as provided in writing by EPA to the Respondent, Respondent will begin to implement the CAP in full. Should Respondent

require additional time to complete the work required under the approved CAP, it will notify EPA in writing at least sixty (60) days before the deadline.

62. Respondent shall submit a notice to EPA within thirty (30) days of completion of all CAP requirements.
63. Red Hill shall notify EPA and VDEQ within thirty (30) days of conveyance and transfer of the Sewer Line to Prince George County.
64. No later than sixty (60) days from approval of the CAP, Respondent shall submit to EPA for review a list of deadlines included in the AAOC. The list shall be submitted in an electronic format (e.g., unlocked spreadsheet or similar format agreed to by the Parties).

IX. EFFECTIVE DATE

76. This AAOC shall become effective upon the Respondent's receipt of a fully executed copy of this AAOC.

FOR RESPONDENT RED HILL UTILITY, LLC

By:



William Peyton Beard, III, Manager
Red Hill Utility, LLC
(dated via electronic timestamp)

SO ORDERED:

FOR U.S. ENVIRONMENTAL PROTECTION AGENCY

By:

Karen Melvin, Director
Enforcement & Compliance Assurance Division
U.S. Environmental Protection Agency, Region III
(dated via electronic timestamp)

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[Digital Signature and Date]
Bevin Esposito
Regional Hearing Clerk
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