



## REGION 3

PHILADELPHIA, PA 19103

### VIA ELECTRONIC MAIL

Daniela Rost, Esq.  
Felman Production, LLC  
4442 Graham Station Road  
Letart, WV 25253  
[Daniela@ualloys.com](mailto:Daniela@ualloys.com)

**Re: Administrative Order on Consent – Docket No. CWA-03-2024-0037DN**

Dear Mrs. Rost:

Attached is the executed Administrative Order on Consent (“AOC”) concerning violations of the Clean Water Act (“CWA”), as amended, 33 U.S.C. § 1251, *et seq.* The United States Environmental Protection Agency (“EPA”) is issuing this AOC to Felman Production, LLC (“Felman”) under the authority of Section 309(a) of the CWA, 33 U.S.C. § 1319(a), for alleged violations at Felman’s facility at 4442 Graham Station Road, Letart, WV 25253. The AOC requires Felman to take all actions necessary to comply with its permit (or subsequent permits or permit modifications, including permit compliance schedules, issued by West Virginia Department of Environmental Protection) at its facility. In addition, within 60 days of the Effective Date of the AOC, Felman will provide to EPA for review a Corrective Action Plan (“CAP”), which will include, at a minimum, the following:

- (a) An identification of and brief explanation of all the potential sources of pollutants that may be causing the effluent exceedances identified in Table 1 of the AOC, including for iron, aluminum, lead, total suspended solids, nitrogen, cadmium, fecal coliform, zinc, pH and chromium;
- (b) A technical review of the treatment systems for stormwater and sanitary waste;
- (c) An evaluation of potential solutions for full Permit compliance, including permitting strategies, pollutant minimization, and treatment options; and
- (d) A plan and schedule to implement the potential solution(s) the Felman will undertake to return to full permit compliance.

Please note that the effective date of the AOC is today, the date of your receipt of a fully executed copy of the AOC.

If you have any questions regarding the AOC, please contact Angela Weisel of the NPDES Enforcement Section at (215) 814-2124 or [weisel.angela@epa.gov](mailto:weisel.angela@epa.gov), or contact Promy Tabassum, the attorney assigned to this matter, at (215) 814-2665 or [tabassum.promy@epa.gov](mailto:tabassum.promy@epa.gov).

Sincerely,

Karen Melvin, Director  
Enforcement & Compliance Assurance Division  
U.S. Environmental Protection Agency,  
Region 3

Enclosure

cc: Angela Weisel, EPA ([weisel.angela@epa.gov](mailto:weisel.angela@epa.gov))  
Promy Tabassum, EPA ([tabassum.promy@epa.gov](mailto:tabassum.promy@epa.gov))