



**REGION 3**

PHILADELPHIA, PA 19103

**VIA ELECTRONIC MAIL**

David M. Loring, Esq.  
Ardentfox Schiff, LLP  
233 South Wacher Drive, Suite 7100  
Chicago, Illinois 60606  
David.loring@afslaw.com

**Re: Administrative Order on Consent – Docket No. CWA-03-2026-0012DN**

Dear Mr. Loring:

Attached is the executed Administrative Order for Compliance 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”) Region 3 is issuing this AOC to your client West Virginia Manufacturing, LLC, under the authority of Section 309(a) of the Clean Water Act (“CWA” or “Act”), 33 U.S.C. § 1319(a), for violations at West Virginia Manufacturing, LLC’s facility at Route 60 East, Alloy, West Virginia, 25002. The AOC requires West Virginia Manufacturing, LLC to complete tasks and submit certain documents to EPA and implement certain activities in order to meet the requirements of West Virginia Manufacturing, LLC’s National Pollutant Discharge Elimination Permit Nos. WV0000167 and WVG612001.

The AOC requires West Virginia Manufacturing, LLC to perform several tasks described more fully in the AOC, in order to return to permit compliance. These are listed in Section V. on Page 6 of the AOC. West Virginia Manufacturing, LLC must also submit semi-annual reports to EPA, by July 31 and January 31 of each calendar year. The semi-annual reports shall include the items listed in Paragraph 40.c of the AOC.

Please note that this AOC is effective upon your receipt, on behalf of your client, of this fully-executed copy of the AOC.

If you have any questions regarding the AOC, please contact Mike Greenwald of the NPDES Enforcement Section at (215) 814-2398 or [greenwald.michael@epa.gov](mailto:greenwald.michael@epa.gov), or contact Lauren Zarrillo, the attorney assigned to this matter, at (215) 814-2475 or [zarrillo.lauren@epa.gov](mailto:zarrillo.lauren@epa.gov).

Sincerely,

Andrea Bain  
Acting Director  
Enforcement & Compliance Assurance Division

Enclosure

1. Administrative Order on Consent – Docket No. CWA-03-2026-0012DN

cc: Mike Greenwald, EPA ([greenwald.michael@epa.gov](mailto:greenwald.michael@epa.gov))  
Lauren Zarrillo, EPA ([zarrillo.lauren@epa.gov](mailto:zarrillo.lauren@epa.gov))