

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219

BEFORE THE ADMINISTRATOR

IN THE MATTER OF)	
)	Docket No. CWA-07-2020-0062
NEBCO, Inc.)	
)	FINDINGS OF VIOLATION
&)	AND ORDER FOR COMPLIANCE
)	ON CONSENT
Concrete Industries, Inc.,)	
)	
Respondents.)	
)	
Proceedings under Section 309(a)(3))	
of the Clean Water Act, 33 U.S.C. § 1319(a)(3))	
_____)	

Preliminary Statement

1. The following Findings of Violation and Administrative Order for Compliance on Consent (“Order”) are made and issued pursuant to Section 309(a)(3) of the Clean Water Act (“CWA”), 33 U.S.C. § 1319(a)(3). This Authority has been delegated by the Administrator of the U.S. Environmental Protection Agency (“EPA”) to the Regional Administrator, EPA Region 7 and further delegated to the Director of Region 7’s Enforcement and Compliance Assurance Division.

2. Respondents are NEBCO, Inc. and Concrete Industries, Inc., d/b/a Concrete Industries Nebraska City, corporations under the laws of the state of Nebraska, and the owner(s) and/or operator(s) of a facility known as the Nebraska City Ready-Mix Concrete Plant located at 918 East 4th Street in Nebraska City, Otoe County, Nebraska.

3. The EPA, together with the Respondents enter into this Section 309(a)(3) Order for the purpose of carrying out the goals of the CWA, 33 U.S.C. § 1251 *et seq.*, to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.”

4. It is the Parties’ intent through entering into this Order to address alleged noncompliance with the CWA and Respondents’ National Pollutant Discharge Elimination System (“NPDES”) permit for discharges of industrial stormwater. As set forth in this Order on Consent, the Parties have amicably reached agreement regarding the timeframes for Respondents to ensure compliance with the CWA and its NPDES permit.

By entering into this Order, Respondents (1) consent to and agree not to contest the EPA's authority or jurisdiction to issue and enforce this Section 309(a) Order on Consent, (2) agree to undertake all actions required by the terms and conditions of this Order on Consent, and (3) consent to be bound by the requirements set forth herein. Respondents neither admit nor deny the specific factual allegations or Findings of Violation in this Order on Consent in their entirety, except that Respondents admit the jurisdictional allegations herein. Respondents also waive any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondents may have with respect to any issue of fact or law set forth in this Order on Consent, including any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706. The Parties agree that no conclusion of this Order will be used to conclusively establish any fact or conclusion contained herein for the purposes of any case except for the one identified above.

Statutory and Regulatory Framework

5. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person, except in compliance with, *inter alia*, Section 402 of the CWA, 33 U.S.C. § 1342. Section 402 of the CWA provides that pollutants may be discharged in accordance with the terms of an NPDES permit issued pursuant to that Section.

6. The CWA prohibits the discharge of “pollutants” from a “point source” into a “navigable water” of the United States, as these terms are defined by Section 502 of the CWA, 33 U.S.C. § 1362.

7. Section 402(p) of the CWA, 33 U.S.C. § 1342(p), sets forth requirements for the issuance of NPDES permits for the discharge of stormwater. Section 402(p) of the CWA requires, in part, that a discharge of stormwater associated with an industrial activity must comply with the requirements of an NPDES permit issued pursuant to Sections 301 and 402 of the CWA.

8. Pursuant to Section 402(p) of the CWA, the EPA promulgated regulations setting forth the NPDES permit requirements for stormwater discharges at 40 C.F.R. § 122.26.

9. 40 C.F.R. §§ 122.26(a)(1)(ii) and 122.26(c) require dischargers of stormwater associated with industrial activity to apply for an individual permit or to seek coverage under a promulgated stormwater general permit.

10. 40 C.F.R. § 122.26(b)(14) defines “stormwater discharge associated with industrial activity,” as “the discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing or raw material storage areas at an industrial plant,” and includes “storm water discharges from industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters (as defined at part 401 of this chapter); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing

buildings; storage areas (including tank farms) for raw materials, and intermediate and final products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water.” Further, 40 C.F.R. § 122.26(b)(14) defines “material handling activities” to “include storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product, by-product or waste product.” 40 C.F.R. § 122.26(b)(14) further provides that a storm water discharge “does not include discharges from facilities or activities excluded from the NPDES program under this part 122.”

11. Included in the categories of facilities considered to be engaging in “industrial activity” are facilities under Standard Industrial Classifications (“SIC”) Industry Group 32. *See* 40 C.F.R. §122.26(b)(14)(ii). SIC code 3273 specifically includes establishments primarily engaged in manufacturing portland cement concrete manufactured and delivered to a purchaser in a plastic and unhardened state.

12. The Nebraska Department of Environment and Energy (“NDEE”) is the state agency within the state of Nebraska that has been authorized by the EPA to administer the federal NPDES program pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, and applicable implementing regulations.

13. Pursuant to Section 402(i) of the CWA, 33 U.S.C. § 1342(i), the EPA retains concurrent enforcement authority with authorized states for violations of the CWA.

EPA’s General Allegations

14. Respondents are each a “person,” as defined by Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

15. At all times relevant for this action, Respondents were the owner(s) and/or operator(s) of a ready mixed concrete supply plant operating under SIC code 3273 and located at 918 East 4th Corso, Nebraska City, Nebraska 68410 (“ready-mix plant”), and a material storage area located approximately 0.5 miles south of the plant (“material storage area”), and accessed only by an interior facility road, together comprising approximately 15 acres (collectively, the “facility” or “site”).

16. The facility site is bordered to the east by the Missouri River. Stormwater, snow melt, surface drainage and runoff water leave Respondents’ facility and flow from several locations and into the Missouri River including: 1) outfall 001 on the northwest boundary of the ready-mix plant; 2) the material storage area generally south and east to an alleged unidentified outfall and approximately 430 yards into the Missouri River; or 3) the northeast portion of the material storage area approximately 80 yards down a sloped wooded area..

17. Stormwater from the site contains “pollutants” as defined by Section 502(6) of the CWA, 33 U.S.C. § 1362(6).

18. The facility has alleged “stormwater discharges associated with industrial activity” as defined by 40 C.F.R. § 122.26(b)(14), including alleged discharges from the ready-mix plant and

the material storage area where stock piles of clean-out material from the truck wash pit at the ready-mix plant and recycled or crushed concrete and asphalt are stored and recycled.

19. Stormwater discharges associated with industrial activity are “point sources” as defined by Section 502(14) of the CWA, 33 U.S.C. § 1362(14).

20. The Missouri River is a “navigable water” as defined by Section 502(7) of the CWA, 33 U.S.C § 1362(7).

21. Stormwater runoff from industrial activity at Respondents’ above referenced facility results in the addition of pollutants from a point source to navigable waters, and thus is the “discharge of a pollutant” as defined by CWA Section 502(12), 33 U.S.C. § 1362(12).

22. Respondents’ discharge of pollutants, including discharges of stormwater associated with an industrial activity, as defined by 40 C.F.R. § 122.26(b)(14)(ii), requires a permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

23. On November 11, 2016, NDEE granted authorization to the facility under Nebraska General Permit number NER910191 for discharges of stormwater runoff to the Missouri River, subject to compliance with conditions and limitations set forth in the permit, (hereinafter “NPDES Permit”). This general permit was signed by NDEE and became effective on July 18, 2016 and expires on June 30, 2021.

24. On April 23 and 24, 2019, the EPA performed an Industrial Stormwater Inspection (“Inspection”) of Respondents’ site under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to evaluate Respondents’ compliance with its NPDES Permit and the CWA.

25. During the Inspection, the EPA inspector reviewed Respondents’ records and obtained copies of Respondents’ documents related to the NPDES Permit, including, but not limited to, the facility’s stormwater pollution prevention plan (“SWPPP”), inspection records, and monitoring records. The EPA inspector also toured the facility, observed the alleged discharge locations, and photographed various stormwater-related areas.

26. A Notice of Potential Violation (“NOPV”) was issued by the EPA inspector at the conclusion of the Inspection.

27. A copy of the Inspection report was sent to Respondent Concrete Industries, Inc. by the EPA by letter dated June 18, 2019.

EPA’s Findings of Violation

Count 1

Unauthorized Discharges and Inadequate SWPPP

28. The facts stated above are re-alleged and incorporated herein by reference.

29. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants, unless such discharge is in compliance with an NPDES permit.

30. Part 5 of Respondents' NPDES Permit requires the facility to develop and implement a SWPPP as a condition of the permit that identifies potential sources of pollution and describes and ensures the implementation of practices to reduce pollutants in storm water discharges from the facility. More specifically, Part 5.1.2 requires that the SWPPP provide a description of the nature of the industrial activities at the facility and a site map showing structural controls and stormwater outfalls, among other things. Part 5.1.3 of Respondents' NPDES Permit requires the SWPPP to document areas at the facility where industrial materials or activities are exposed to stormwater, and Part 5.1.4.1 requires the SWPPP to document the location and type of control measures and describe how the control measures address the pollutant sources identified pursuant to Part 5.1.3.

31. During the EPA Inspection, the inspector reviewed the facility's SWPPP and identified that it did not include the material storage area in the site map and did not identify activities, alleged outfalls, structural controls or other best management practices at the material storage area.

32. During the EPA Inspection, in the material storage area, the inspector observed and documented a lack of controls, evidence of the alleged stormwater runoff carrying materials from stockpiles, and storm water allegedly discharging through an alleged outfall not identified in the SWPPP.

33. At the time of the Inspection, the area northeast of the unidentified area, which is approximately 430 yards between the alleged outfall and the Missouri River, was flooded, and stormwater that the inspector observed discharging through the alleged outfall appeared to come into contact with water in the flooded area, which water was in contact with flood water from the Missouri River.

34. Based on observations and information collected from the EPA Inspection and aerial images obtained by the EPA, during significant precipitation events, EPA alleges that stormwater from the northeast portion of the material storage area discharges east to the Missouri River and stormwater from the remaining portion of the material storage area discharges south through the alleged unidentified outfall and then into the Missouri River under both flooded and non-flooded conditions.

35. Alleged unauthorized discharges and failure to identify the material storage area in the SWPPP are violations of the conditions of Respondents' NPDES permit and Sections 301(a) and/or 402(p) of the CWA, 33 U.S.C. §§ 1311(a), 1342(p).

Count 2

Failure to Implement SWPPP / Failure to Implement Adequate Controls

36. The facts stated above are re-alleged and incorporated herein by reference.

37. Part 5 of Respondents' NPDES Permit requires the SWPPP to document the selection, design, and installation of control measures, which are required by Part 2 to minimize pollutant discharges.

38. Part 2.1.2.2 of Respondents' NPDES Permit requires the facility to keep clean all exposed areas that are potential sources of pollutants by using good housekeeping measures, and Parts 2.1.2.5 and 2.1.2.6 require the facility to minimize erosion and contain and manage runoff to minimize pollutants in discharges. Part 2.1.2.3 of Respondent's NPDES Permit requires the facility to maintain all control measures in effective operating condition.

39. During the EPA Inspection, the inspector observed the following conditions, indicating that the SWPPP was not being implemented and/or appropriate controls were not being implemented and/or maintained:

- a. Inadequate controls in the material storage area;
- b. Failure to implement good housekeeping practices in the material storage area; and
- c. Inadequate controls at the ready-mix plant, including failure to prevent runoff from the site south of the fuel tank area, to contain all concrete washout and track wash waste material, and to maintain or repair a displaced gravel berm and gravel in drainageway.

40. Respondents' failure to implement the SWPPP and/or implement adequate stormwater management controls is a violation of the conditions of Respondents' NPDES Permit, and as such, is a violation of Section 402(p) of the CWA, 33 U.S.C. § 1342(p).

Count 3

Failure to Adequately Perform and Document Routine Facility Inspections

41. The facts stated above are re-alleged and incorporated herein by reference.

42. Part 4.1.1 of Respondents' NPDES Permit requires Respondent(s) to conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to stormwater and of all stormwater control measures at least quarterly. Part 4.1.2 of Respondents' NPDES Permit requires Respondent(s) to document the findings of each routine facility inspection, including, but not limited to, any control measures needing maintenance or repairs, any failed control measures that need replacement, any incidents of noncompliance observed, and any control measures needed to comply with the permit requirements.

43. A review of inspection reports provided by the facility during the EPA Inspection identified that not all potential sources of pollutants, control measures, outfalls, and/or evidence of unauthorized releases or discharges were inspected, and if they were, the observations documented were inaccurate, resulting in a failure to take corrective action in accordance with Part 3 of Respondents' NPDES Permit.

44. Respondents' failure to adequately perform and document routine facility inspections is a violation of the conditions of Respondents' NPDES Permit, and as such, is a violation of Section 402(p) of the CWA, 33 U.S.C. § 1342(p).

Count 4

Failure to Perform and Adequately Perform and Document Quarterly Visual Assessments

45. The facts stated above are re-alleged and incorporated herein by reference.

46. Part 4.2.1 of Respondents' NPDES Permit requires Respondent(s) to collect a stormwater sample from each outfall and conduct a visual assessment of each sample once each quarter (i.e. "Quarterly Visual Assessments"). Parts 4.2.1 and 4.2.2 provide that if it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes of discharge and you must document why it was not possible to take samples within the first 30 minutes. Part 4.3 of Respondents' NPDES Permit requires at least one quarterly visual assessment to capture snowmelt discharge.

47. Parts 4.2.1 and 4.2.2 of Respondents' NPDES Permit require Quarterly Visual Assessment documentation to include the results of visual inspection such as color and probable sources of any observed stormwater contamination, and that corrective action be taken in accordance with Part 3 of the NPDES Permit.

48. Part 5.4 of Respondents' NPDES Permit requires that permittees keep all inspection reports, including Quarterly Visual Assessments, together with the SWPPP to demonstrate full compliance with the conditions of the permit. Part 7.3 of Respondents' NPDES Permit requires that permittees keep documentation pursuant to Part 5.4 for at least 3 years following coverage under the permit.

49. A review of records during the EPA Inspection identified that the Quarterly Visual Assessments were not kept together with the SWPPP.

50. A review of three Quarterly Visual Assessment records provided during the EPA Inspection revealed that samples were not taken at all alleged outfalls, not collected within the first 30 minutes of discharge nor was a reason given for why it was not feasible to do so and did not include at least one quarterly visual assessment to capture snowmelt discharge. In addition, where the Quarterly Visual Assessment did note discoloration of the discharge sample, the record lacked any explanation of probable sources of contamination or documentation of corrective action.

51. Besides the Quarterly Visual Assessment records provided, Respondents failed to conduct and/or document or keep any Quarterly Visual Assessments for the entire calendar year of 2016, the first, third, and fourth quarters of 2017, first and fourth quarters of 2018, and first quarter of 2019.

52. Respondents' failure to perform, adequately perform, document and/or keep Quarterly Visual Assessments is a violation of the conditions of Respondents' NPDES Permit, and as such, is a violation of Section 402(p) of the CWA, 33 U.S.C. § 1342(p).

**Count 5
Failure to Perform Benchmark Monitoring**

53. The facts stated above are re-alleged and incorporated herein by reference.

54. Parts 6.2.1 and 8.E.4 of Respondents' NPDES Permit require concrete facilities to collect and analyze quarterly stormwater samples for benchmarks including monitoring for Total Suspended Solids (TSS) and Total Iron.

55. Respondents failed to perform benchmark monitoring for the entire calendar year of 2016, the first and fourth quarters of 2017, and the first and fourth quarters of 2018.

56. Respondents' failure to perform benchmark monitoring is a violation of the conditions of Respondents' NPDES Permit, and as such, is a violation of Section 402(p) of the CWA, 33 U.S.C. § 1342(p).

Reasonable Time to Achieve Compliance

57. Pursuant to Section 309(a)(5)(A) of the CWA, 33 U.S.C. § 1319(a)(5)(A), and having taken into account the seriousness of the violations, the EPA finds that sixty (60) days is a reasonable time for Respondents to achieve compliance with the terms and conditions of its NPDES Permit.

Order for Compliance on Consent

58. Based on the EPA Findings set forth above, and pursuant to Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), the EPA hereby ORDERS the Respondents, and the Respondents hereby AGREE, to take the actions described below.

59. In accordance with this Order, the Respondents shall take all necessary actions to correct the EPA's alleged deficiencies and eliminate and prevent recurrence of the alleged violations cited above, and to come into compliance with all of the applicable requirements of its industrial stormwater NPDES Permit, including, but not limited to:

- a. Revise the facility's SWPPP to meet all applicable requirements of the NPDES Permit;
- b. Install appropriate stormwater management controls to prevent the discharge of pollutants and conduct proper operation and maintenance at the facility as required the NPDES Permit and described in the revised SWPPP;
- c. Conduct and document routine and quarterly visual inspections in accordance with the NPDES Permit; and

- d. Perform benchmark monitoring and retain records of all monitoring information as required by the NPDES Permit and take appropriate corrective actions when benchmarks are high in accordance with the NPDES Permit.

60. By no later than sixty (60) days from the effective date of this Order, the Respondents shall submit a written report to provide the following:

- a. A copy of the updated and revised SWPPP for the facility;
- b. A copy of facility inspection reports that have been conducted since the effective date of this Order; and
- c. A written description and photo documentation, if appropriate, of all actions taken to date to achieve compliance with the NPDES Permit.

61. The EPA may, after review of the SWPPP, inspection reports, and description of actions taken submitted by Respondents, provide written comments and suggestions regarding such submittals. Review and comment on the SWPPP or other submissions by the EPA does not relieve Respondents of the responsibility to comply with its NPDES Permit, the CWA, applicable State law, or this Order.

62. After review of the information submitted by Respondents pursuant to the above Paragraphs, EPA may determine that additional information is needed and/or additional corrective measures or deadlines are appropriate, and may modify this Order or initiate a separate enforcement action, as appropriate.

Reports/Submissions

63. *Semi-Annual Reporting.* In addition to the report required by Paragraph 60, above, Respondents shall submit semi-annual reports describing the actions it has taken to ensure continued compliance with the terms of its NPDES Permit and this Order. These reports are due six (6) months and twelve (12) months, respectively, from the reporting deadline in Paragraph 60. Each report shall include, at a minimum:

- a. A description of implementation and/or revision of the SWPPP during the previous six (6) month period;
- b. A description of work and other actions taken to construct the structural controls and/or implement other controls described above in the previous six (6) month period; and
- c. Copies of all relevant documentation regarding the activities described pursuant to subparagraphs (a) and (b), including, but not limited to, inspection reports and monitoring records.

64. *Submittals.* All documents required to be submitted to EPA by this Order, including the certification statement in Paragraph 67 below, shall be submitted by electronic mail to:

acord.angela@epa.gov

Angela Acord, or her successor
U.S. Environmental Protection Agency – Region 7
Enforcement and Compliance Assurance Division
11201 Renner Boulevard
Lenexa, Kansas 66219.

65. Electronic submissions to the EPA will be deemed submitted on the date they are transmitted electronically. Any report, notification, certification, or other communication that cannot be submitted electronically to the EPA shall be submitted in hard-copy to the address provided above.

66. All documents required to be submitted pursuant to this Order shall also be submitted by mail to NDEE to the address provided below:

Shelley Schneider
Water Permits Division
Nebraska Department of Environment and Energy
P.O. Box 98922
Lincoln, Nebraska 68509-8922.

67. Each submission requirement of this Order shall contain the following certification signed by an authorized official, as described at 40 C.F.R. § 122.22:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

General Provisions

Effect of Compliance with the Terms of this Order for Compliance

68. Compliance with the terms of this Order shall not relieve Respondents of liability for, or preclude the EPA from, initiating an administrative or judicial enforcement action to recover penalties for any violations of the CWA, or to seek additional injunctive relief, pursuant to Section 309 of the CWA, 33 U.S.C. § 1319.

69. This Order does not constitute a waiver or a modification of any requirements of the CWA, 33 U.S.C. § 1251 *et seq.*, all of which remain in full force and effect. The EPA retains the right to seek any and all remedies available under Sections 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d) or (g), for any violation cited in this Order. Issuance of this Order

shall not be deemed an election by the EPA to forgo any civil or criminal action to seek penalties, fines, or other appropriate relief under the CWA for any violation whatsoever.

Access and Requests for Information

70. Nothing in this Order shall limit the EPA's right to obtain access to, and/or to inspect Respondents' facility, and/or to request additional information from Respondents, pursuant to the authority of Section 308 of the CWA, 33 U.S.C. § 1318 and/or any other authority.

Severability

71. If any provision or authority of this Order, or the application of this Order to Respondents, is held by federal judiciary authority to be invalid, the application to Respondents of the remainder of this Order shall remain in full force and effect and shall not be affected by such a holding.

Effective Date

72. The terms of this Order shall be effective and enforceable against Respondents on the Effective Date, which is the date this Order is signed by the EPA.

Modification

73. At the EPA's sole discretion, extensions of the compliance schedules / deadlines required by this Order may be made by the EPA by written notice to Respondent, without further formal amendment to the Order. The EPA's consent for a requested extension will not be unreasonably withheld. All other modifications to this Order may only be made by mutual agreement of the Parties, pursuant to a written amendment signed by each Party.

Termination

74. This Order shall remain in effect until a written notice of termination is issued by an authorized representative of the EPA.

For the Complainant, U.S. Environmental Protection Agency:

Issued this _____ day of _____, 20__.

David Cozad

David Cozad
Director
Enforcement and Compliance Assurance Division

Shane E. C. McCain

Shane E. C. McCain
Assistant Regional Counsel
Office of Regional Counsel

For the Respondent, NEBCO, Inc.:

Robert E. Caldwell
Signature

3-9-2020
Date

Robert E. Caldwell
Name

Executive Vice President
Title

For the Respondent, Concrete Industries, Inc.:

Robert A. Nordquist 3/9/2020
Signature Date

Robert A. Nordquist
Name

President
Title

Certificate of Service

I certify that on the date noted below I delivered this Findings of Violation and Administrative Order for Compliance on Consent to the Regional Hearing Clerk, U.S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219 by electronic mail to haugen.lisa@epa.gov.

I further certify that on the date noted below I sent a copy of the foregoing Order for Compliance on Consent by electronic mail to the following:

For Respondents, NEBCO, Inc. & Concrete Industries, Inc:

ShannonD@nebcoinc.com
Shannon L. Doering, Registered Agent

For Complainant, U.S. Environmental Protection Agency, Region 7:

acord.angela@epa.gov
Angela Acord, Enforcement and Compliance Assurance Division

mccoin.shane@epa.gov
Shane McCoin, Office of Regional Counsel

For Nebraska Department of Environmental Quality:

steve.goans@nebraska.gov
Steve Goans
Water Management Division

Date

Signature