

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

FILED

May 01, 2025

9:08 am

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

In the Matter of:	:
	:
Nova Petroleum Suppliers LLC	: U.S. EPA Docket No. RCRA-03-2025-0076
6820 Commercial Drive	:
Springfield, VA 22151	: Proceeding under Section 9006 of the Resource
	: Conservation and Recovery Act, 42 U.S.C. Section
Respondent.	: 6991e
	:
12th Street Shell	:
3701 12th St. NE	:
Washington, D.C. 20017	:
	:
Facility.	:

CONSENT AGREEMENT

PRELIMINARY STATEMENT

1. This Consent Agreement is entered into by the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3 ("Complainant") and Nova Petroleum Suppliers LLC ("Respondent") (collectively the "Parties"), pursuant to Section 9006 of the Resource Conservation and Recovery Act ("RCRA" or the "Act"), 42 U.S.C. § 6991e, and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation, Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22. Section 9006 of RCRA authorizes the Administrator of the U.S. Environmental Protection Agency to assess penalties and undertake other actions required by this Consent Agreement. The Administrator has delegated this authority to the Regional Administrator who, in turn, has delegated the authority to enter into agreements concerning administrative penalties to the Complainant. This Consent Agreement and the attached Final Order (hereinafter jointly referred to as the "Consent Agreement and Final Order") resolve Complainant's civil penalty claims against Respondent under RCRA Subtitle I, 42 U.S.C. §§ 6991-6991m, for the violations alleged herein.
2. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant hereby simultaneously commences and resolves this administrative proceeding.

JURISDICTION

3. The U.S. Environmental Protection Agency ("EPA") has jurisdiction over the above-captioned matter, as described in Paragraph 1, above.

4. The Consolidated Rules of Practice govern this administrative adjudicatory proceeding pursuant to 40 C.F.R. § 22.1(a)(4).
5. The EPA has given the District of Columbia Department of Energy and Environment (“DOEE”) notice of the issuance of this Consent Agreement and Final Order in accordance with Section 9006(a)(2) of RCRA, 42 U.S.C. § 6991e(a)(2).

GENERAL PROVISIONS

6. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this Consent Agreement and Final Order.
7. Except as provided in Paragraph 6, above, Respondent neither admits nor denies the specific factual allegations set forth in this Consent Agreement.
8. Respondent agrees not to contest the jurisdiction of EPA with respect to the execution of this Consent Agreement, the issuance of the attached Final Order, or the enforcement of this Consent Agreement and Final Order.
9. For purposes of this proceeding only, Respondent hereby expressly waives its right to contest the allegations set forth in this Consent Agreement and Final Order and waives its right to appeal the accompanying Final Order.
10. Respondent consents to the assessment of the civil penalty stated herein, to the issuance of any specified compliance order herein, and to any conditions specified herein.
11. Respondent shall bear its own costs and attorney’s fees in connection with this proceeding.
12. By signing this Consent Agreement, Respondent waives any rights or defenses that Respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the Final Order accompanying the Consent Agreement.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

13. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant alleges and adopts the Findings of Fact and Conclusions of Law set forth immediately below.

14. The District of Columbia is approved to administer and enforce an underground storage tank program in lieu of the Federal program under Subtitle I of the Act, 42 U.S.C. §§ 6991-6991m. The program, as administered by DOEE, was approved by the EPA, pursuant to 42 U.S.C. 6991c and 40 CFR part 281. The EPA approved the District of Columbia underground storage tank (“UST”) program, set forth in the District of Columbia Municipal Regulations (“DCMR”), Title 20, Chapters 55-67 and 70, under “Underground Storage Tanks,” on July 9, 1997, and approval of the District of Columbia UST program became effective on May 4, 1998. A subsequent UST program revision application was approved by the EPA on January 27, 2022 and became effective on March 28, 2022.
15. The federally approved District of Columbia UST program is enforceable by the EPA pursuant to Section 9006(a) of RCRA, 42 U.S.C. § 6991e(a).
16. Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d), authorizes the assessment of civil penalties against any owner or operator of an UST who fails to comply with, *inter alia*, any requirement or standard of a State program that has been approved pursuant to Section 9004 of RCRA, 42 U.S.C. § 6991c.
17. The District of Columbia UST program regulates USTs used to contain “regulated substances,” as that term is defined in Section 9001(7) of RCRA, 42 U.S.C. § 6991(7), and 20 DCMR 7099.1.
18. At all times relevant to this Consent Agreement, Respondent is, and has been, a “person,” as defined by Section 9001(5) of RCRA, 42 U.S.C. § 6991(5), and 20 DCMR 7099.1.
19. At all times relevant to this Consent Agreement, Respondent is, and has been, the “operator,” as defined by Section 9001(3) of RCRA, 42 U.S.C. § 6991(3), and 20 DCMR 7099.1, of “USTs,” as defined in Section 9001(10) of RCRA, 42 U.S.C. 6991(10), and 20 DCMR 7099.1, and of “UST systems,” as defined by 20 DCMR 7099.1, at the 12th Street Shell UST facility located at 3701 12th St. NE, Washington, D.C. 20017 (“the Facility”).
20. At all times relevant to this Consent Agreement there were the following four USTs at the Facility, each of which contained a regulated substance.
 - a. A 10,000-gallon tank that contained regular gasoline and was installed on or about July 1986 (hereinafter “Tank 1”). Tank 1 was constructed of cathodically-protected steel and was equipped with fiberglass reinforced plastic piping. Tank 1 used a Veeder-Root TLS-350R automatic tank gauging (“ATG”) monitoring system to perform continuous statistical leak detection.

- b. A 10,000-gallon tank that contained regular gasoline and was installed on or about July 1986 (hereinafter “Tank 2”). Tank 2 was constructed of cathodically-protected steel and was equipped with fiberglass reinforced plastic piping. Tank 2 used a Veeder-Root TLS-350R ATG monitoring system to perform continuous statistical leak detection.
 - c. A 10,000-gallon tank that contained premium gasoline and was installed on or about July 1986 (hereinafter “Tank 3”). Tank 3 was constructed of cathodically-protected steel and was equipped with fiberglass reinforced plastic piping. Tank 3 used a Veeder-Root TLS-350R ATG monitoring system to perform continuous statistical leak detection.
 - d. A 10,000-gallon tank that contained premium gasoline and was installed on or about July 1986 at the Facility (hereinafter “Tank 4”). Tank 4 was constructed of cathodically-protected steel and was equipped with fiberglass reinforced plastic piping. Tank 4 used a Veeder-Root TLS-350R ATG monitoring system to perform continuous statistical leak detection.
- 21. Between November 28, 2023 and December 28, 2023, Tanks 1, 2, 3, and 4 were removed from the Facility.
 - 22. On December 14, 2022, the EPA conducted an inspection of the Facility (the “Inspection”) to determine its compliance with RCRA Subtitle I, and the DCMR. The EPA received follow-up information from Respondent on January 17, 2023 and December 27, 2023.
 - 23. The count below, and the corresponding penalty payment in this agreement, constitutes “this matter” between the EPA and Respondent.

Count 1

Failure to Maintain Corrosion Protection System for Tanks 1, 2, 3, and 4

- 24. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
- 25. 20 DCMR §5901.1 requires that “[e]ach owner or operator of a steel tank UST, or of a steel-fiberglass-reinforced plastic composite UST with corrosion protection, shall comply with the requirements of this section for as long as the UST is used to store regulated substances.”
- 26. 20 DCMR §5901.2 requires that “[e]ach owner or operator shall operate and maintain the corrosion protection system to continuously provide corrosion protection to the metal components of those portions of the tank and piping system of active and

temporarily closed USTs that routinely contain regulated substances and are in contact with the ground.”

27. To provide corrosion protection, the Facility used an impressed current with a rectifier for Tanks 1, 2, 3, and 4.
28. On February 24, 2023, Respondent’s contractor inspected the impressed current with rectifier and found that it was not operational. The contractor concluded the rectifier needed repairs. Respondent did not repair the rectifier.
29. From at least February 24, 2023 to November 27, 2023, Respondent failed to operate and maintain the corrosion protection system to continuously provide corrosion protection for Tanks 1, 2, 3, and 4.
30. From at least February 24, 2023 to November 27, 2023, Respondent violated 20 DCMR §5901.2 by failing to operate and maintain the corrosion protection system to continuously provide corrosion protection for Tanks 1, 2, 3, and 4.
31. In failing to comply with 20 DCMR §5901.2, Respondent is subject to the assessment of penalties under 9006(d)(2) of RCRA, 42 U.S.C. § 6991e(d)(2).

CIVIL PENALTY

32. In settlement of the EPA’s claims for civil penalties for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty in the amount of THIRTY THOUSAND TWO HUNDRED THIRTY Dollars (\$30,230), which Respondent shall be liable to pay in accordance with the terms set forth below.
33. The civil penalty is based upon the EPA’s consideration of a number of factors, including the penalty criteria (“statutory factors”) set forth in Section 9006(c) and (e) of RCRA, 42 U.S.C. § 6991e(c) and (e), including, the following: the seriousness of the violation, any good faith efforts to comply with the applicable requirements, and any other factors considered appropriate, including Respondent’s agreement to settle in order to resolve disputed facts and legal conclusion. These factors were applied to the particular facts and circumstances of this case with specific reference to the EPA’s October 5, 2023, [Revised Consolidated Enforcement Penalty Policy for Underground Storage Tank \(UST\) Regulations and Revised Field Citation Program and ESA Pilot](#) and November 1990 [U.S. EPA Penalty Guidance for Violations of UST Regulations](#) which reflect the statutory penalty criteria and factors set forth at Section 9006(c) and (e) of RCRA, 42 U.S.C. § 6991e(c) and (e); the appropriate *Adjustment of Civil Monetary Penalties for Inflation*, pursuant to 40 C.F.R. Part 19; and the applicable EPA memoranda addressing the EPA’s civil penalty policies to account for inflation.

34. Respondent agrees to pay a civil penalty in the amount of \$30,230 ("Assessed Penalty") within thirty (30) days of the Effective Date of this Consent Agreement and Final Order.
35. Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>.
36. When making a payment, Respondent shall:
- a. Identify every payment with Respondent's name and the docket number of this Consent Agreement, RCRA-03-2025-0076,
 - b. Concurrently with any payment or within 24 hours of any payment, Respondent shall serve Proof of Payment simultaneously **by email** to the following person(s):

Promy Tabassum
Assistant Regional Counsel
tabassum.promy@epa.gov

U.S. Environmental Protection Agency
Cincinnati Finance Center
CINWD_AcctsReceivable@epa.gov,

and

U.S. EPA Region 3 Regional Hearing Clerk
R3_Hearing_Clerk@epa.gov.

"Proof of Payment" means, as applicable, a copy of the check, confirmation of credit card or debit card payment, or confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to the EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent's name.

37. Interest, Charges, and Penalties on Late Payments. Pursuant to 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay the full amount of the Assessed Penalty per this Consent Agreement, the EPA is authorized to recover, in addition to the amount of the unpaid Assessed Penalty, the following amounts.
- a. Interest. Interest begins to accrue from the Effective Date of this Consent Agreement. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30)

days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. To protect the interests of the United States, the rate of interest is set at the IRS standard underpayment rate, any lower rate would fail to provide Respondent adequate incentive for timely payment.

- b. Handling Charges. Respondent will be assessed monthly a charge to cover the EPA's costs of processing and handling overdue debts. If Respondent fails to pay the Assessed Penalty in accordance with this Consent Agreement, the EPA will assess a charge to cover the costs of handling any unpaid amounts for the first thirty (30) day period after the Effective Date. Additional handling charges will be assessed every thirty (30) days, or any portion thereof, until the unpaid portion of the Assessed Penalty as well as any accrued interest, penalties, and other charges are paid in full.
 - c. Late Payment Penalty. A late payment penalty of six percent (6%) per annum, will be assessed monthly on all debts, including any unpaid portion of the Assessed Penalty, interest, penalties, and other charges, that remain delinquent more than ninety (90) days. Any such amounts will accrue from the Effective Date.
38. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Consent Agreement, the EPA may take additional actions. Such actions the EPA may take include, but are not limited to, the following.
- a. Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R. §§ 13.13 and 13.14.
 - b. Collect the debt by administrative offset (i.e., the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, per 40 C.F.R. Part 13, Subparts C and H.
 - c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, per 40 C.F.R. § 13.17.
 - d. Refer this matter to the United States Department of Justice for litigation and collection, per 40 C.F.R. § 13.33.
39. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a

partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.

40. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Consent Agreement shall not be deductible for purposes of federal taxes.
41. Payment of the civil penalty is due and payable immediately upon receipt by Respondent of a true and correct copy of the fully executed and filed Consent Agreement and Final Order. Receipt by Respondent or Respondent's legal counsel of such copy of the fully executed Consent Agreement and Final Order, with a date stamp indicating the date on which the Consent Agreement and Final Order was filed with the Regional Hearing Clerk, shall constitute receipt of written initial notice that a debt is owed the EPA by Respondent in accordance with 40 C.F.R. § 13.9(a).
42. The Parties consent to service of the Final Order by e-mail at the following valid email addresses: tabassum.promy@epa.gov (for Complainant), and jleiter@bmalaw.net (for Respondent).

GENERAL SETTLEMENT CONDITIONS

43. By signing this Consent Agreement, Respondent acknowledges that this Consent Agreement and Final Order will be available to the public and represents that, to the best of Respondent's knowledge and belief, this Consent Agreement and Final Order does not contain any confidential business information or personally identifiable information from Respondent.
44. Respondent certifies that any information or representation it has supplied or made to the EPA concerning this matter was, at the time of submission true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. The EPA shall have the right to institute further actions to recover appropriate relief if the EPA obtains evidence that any information provided and/or representations made by Respondent to the EPA regarding matters relevant to this Consent Agreement and Final Order, including information about Respondent's ability to pay a penalty, are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that the EPA may have, civil or criminal, under law or equity in such event. Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

CERTIFICATION OF COMPLIANCE

45. Respondent certifies to the EPA, upon personal investigation and to the best of its knowledge and belief, that it currently is in compliance with regard to the violations alleged in this Consent Agreement.

OTHER APPLICABLE LAWS

46. Nothing in this Consent Agreement and Final Order shall relieve Respondent of its obligation to comply with all applicable federal, state, and local laws and regulations, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on the validity of any federal, state, or local permit. This Consent Agreement and Final Order does not constitute a waiver, suspension, or modification of the requirements of RCRA Subtitle I, or any regulations promulgated thereunder.

RESERVATION OF RIGHTS

47. This Consent Agreement and Final Order resolves only the EPA's claims for civil penalties for the specific violation alleged against Respondent in this Consent Agreement and Final Order. The EPA reserves the right to commence action against any person, including Respondent, in response to any condition which the EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. This settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice, 40 C.F.R. § 22.18(c). The EPA reserves any rights and remedies available to it under RCRA Subtitle I, the regulations promulgated thereunder, and any other federal law or regulation to enforce the terms of this Consent Agreement and Final Order after its effective date. Respondent reserves whatever rights or defenses it may have to defend itself in any such action.

EXECUTION /PARTIES BOUND

48. This Consent Agreement and Final Order shall apply to and be binding upon the EPA, Respondent, and the officers, directors, employees, contractors, successors, agents, and assigns of Respondent. By his or her signature below, the person who signs this Consent Agreement on behalf of Respondent is acknowledging that he or she is fully authorized by Respondent to execute this Consent Agreement and to legally bind Respondent to the terms and conditions of this Consent Agreement and Final Order.

EFFECTIVE DATE

49. The Effective Date of this Consent Agreement and Final Order is the date on which the

Final Order, signed by the Regional Administrator of the EPA, Region 3, or the Regional Administrator's designee, the Regional Judicial Officer, is filed along with the Consent Agreement with the Regional Hearing Clerk pursuant to the Consolidated Rules of Practice.

ENTIRE AGREEMENT

50. This Consent Agreement and Final Order constitutes the entire agreement and understanding between the Parties regarding settlement of all claims for civil penalties pertaining to the specific violations alleged herein and there are no representations, warranties, covenants, terms, or conditions agreed upon between the Parties other than those expressed in this Consent Agreement and Final Order.

In the Matter of: Nova Petroleum Suppliers LLC

EPA Docket No. RCRA-03-2025-0076

For Respondent: Nova Petroleum Suppliers LLC

Date: 4/10/2025

By: _____

Monty Berhane
Sr. Vice President

For the Complainant:

After reviewing the Consent Agreement and other pertinent matters, I, the undersigned Director of the Enforcement and Compliance Assurance Division of the United States Environmental Protection Agency, Region 3, agree to the terms and conditions of this Consent Agreement and recommend that the Regional Administrator, or his designee, the Regional Judicial Officer, issue the attached Final Order.

By: **Melvin, Karen** Digitally signed by Melvin, Karen
Date: 2025.04.30 15:07:20
-04'00'

[Digital Signature and Date]
Karen Melvin, Director
Enforcement and Compliance Assurance Division
U.S. EPA – Region 3
Complainant

Attorney for Complainant:

By: **PROMY
TABASSUM** Digitally signed by PROMY
TABASSUM
Date: 2025.04.15 10:05:48 -04'00'

[Digital Signature and Date]
Promy Tabassum
Assistant Regional Counsel
U.S. EPA – Region 3

FILED

May 01, 2025

9:08 am

U.S. EPA REGION 3
HEARING CLERK

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

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: Conservation and Recovery Act, 42 U.S.C. Section
Respondent. : 6991e
:
12th Street Shell :
3701 12th St. NE :
Washington, D.C. 20017 :
:
Facility. :

FINAL ORDER

Complainant, the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3, and Respondent, Nova Petroleum Suppliers LLC have executed a document entitled "Consent Agreement," which I hereby ratify as a Consent Agreement in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22 (with specific reference to Sections 22.13(b) and 22.18(b)(2) and (3)). The terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated into this Final Order as if fully set forth at length herein.

Based upon the representations of the parties in the attached Consent Agreement, the penalty agreed to therein is based upon consideration of, *inter alia*, the EPA's October 5, 2023, *Revised Consolidated Enforcement Penalty Policy for Underground Storage Tank (UST) Regulations and Revised Field Citation Program and ESA Pilot* and November 1990 U.S. EPA *Penalty Guidance for Violations of UST Regulations*; the statutory factors set forth in Section 9006(c) and (e) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6991e(c) and (e); the appropriate Adjustment of Civil Monetary Penalties for Inflation, pursuant to 40 C.F.R. Part 19; and the applicable EPA memoranda addressing the EPA's civil penalty policies to account for inflation.

NOW, THEREFORE, PURSUANT TO Section 9006(d) of RCRA, 42 U.S.C. § 6991e(d), and Section 22.18(b)(3) of the Consolidated Rules of Practice, **IT IS HEREBY ORDERED** that Respondent pay a civil penalty in the amount of **THIRTY THOUSAND TWO HUNDRED THIRTY DOLLARS (\$30,230)**, in accordance with the payment provisions set forth in the Consent Agreement and in 40 C.F.R. § 22.31(c), and comply with the terms and conditions of the Consent Agreement.

This Final Order constitutes the final Agency action in this proceeding. This Final Order shall not in any case affect the right of the Agency or the United States to pursue appropriate injunctive or other equitable relief, or criminal sanctions for any violations of the law. This Final Order resolves only those causes of action alleged in the Consent Agreement and does not waive, extinguish, or otherwise affect Respondent's obligation to comply with all applicable provisions of RCRA Subtitle I and the regulations promulgated thereunder.

The effective date of the attached Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

By: **JOSEPH LISA** Digitally signed by JOSEPH LISA
Date: 2025.05.01 08:39:58 -04'00'

[Digital Signature and Date]
Joseph J. Lisa
Regional Judicial and Presiding Officer
U.S. EPA – Region 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

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Nova Petroleum Suppliers LLC	: U.S. EPA Docket No. RCRA-03-2025-0076
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Springfield, VA 22151	: Proceeding under Section 9006 of the Resource
	: Conservation and Recovery Act, 42 U.S.C. Section
Respondent.	: 6991e
	:
12th Street Shell	:
3701 12th St. NE	:
Washington, D.C. 20017	:
	:
Facility.	:

CERTIFICATE OF SERVICE

I certify that the foregoing ***Consent Agreement and Final Order*** was filed with the EPA Region 3 Regional Hearing Clerk on the date that has been electronically stamped on the ***Consent Agreement and Final Order***. I further certify that on the date set forth below, I caused to be served a true and correct copy of the foregoing to each of the following persons, in the manner specified below, at the following addresses:

Copies served via email to:

Monty Berhane, Sr. Vice President
Capitol Petroleum Group
6820 Commercial Drive
Springfield, Virginia 22151
monty@capitolpetro.com


Jeffrey Leiter, Esq.
Bassman, Mitchell, Alfano & Leiter, Chtd.
1707 L Street, NW, Suite 560
Washington, D.C. 20036
jleiter@bmalaw.net

Promy Tabassum, Esq.
Assistant Regional Counsel
U.S. EPA, Region 3
tabassum.promy@epa.gov

Nicole Okino
Enforcement and Compliance Officer
U.S. EPA, Region 3
okino.nicole@epa.gov

By:

BEVIN
ESPOSITO

 Digitally signed by BEVIN
ESPOSITO
Date: 2025.05.01 09:09:53 -04'00'

[Digital Signature and Date]

Regional Hearing Clerk
U.S. EPA – Region 3