# *COMMONWEALTH of VIRGINIA*

***DEPARTMENT OF ENVIRONMENTAL QUALITY***

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## VIRGINIA WASTE MANAGEMENT BOARD AND STATE WATER CONTROL BOARD ENFORCEMENT ACTION - ORDER BY CONSENT ISSUED TO GREEN ZONE INVESTMENTS, LLC FOR TIRE RECYCLERS, INC. Permit-By-Rule No. 556

**SECTION A: Purpose**

This is a Consent Order issued under the authority of Va. Code § 10.1-1455 and § 62.1-44.15, between the Virginia Waste Management Board, the State Water Control Board and Green Zone Investments, LLC, d/b/a Tire Recyclers, Inc., for the purpose of resolving violations of the Virginia Waste Management Act, the State Water Control Law and the Regulations and the applicable permit.

**SECTION B: Definitions**

Unless the context clearly indicates otherwise, the following words and terms have the meaning assigned to them below:

1. "305(b) report" means the report required by Section 305(b) of the Clean Water Act (33 United States Code § 1315(b)), and Va. Code § 62.1-44.19:5 for providing Congress and the public an accurate and comprehensive assessment of the quality of State surface waters.

2. "Board" means the Virginia Waste Management Board, a permanent citizens' board of the Commonwealth of Virginia, as described in Va. Code §§ 10.1-1184 and – 1401; and/or the State Water Control Board as described in Va. Code §§ 10.1-1184 and 62.1-44.7.

3. "Department" or "DEQ" means the Department of Environmental Quality, an agency of the Commonwealth of Virginia as described in Va. Code § 10.1-1183.

4. "Director" means the Director of the Department of Environmental Quality, as described in Va. Code § 10.1-1185.

5. "Discharge" means discharge of a pollutant. 9 VAC 25-31-10.

6. "Discharge of a Pollutant" when used with reference to the requirements of the VPDES permit program means:

   (a) Any addition of any pollutant or combination of pollutants to surface waters from any point source; or

   (b) Any addition of any pollutant or combination of pollutants to the waters of the contiguous zone or the ocean from any point source other than a vessel or other floating craft which is being used as a means of transportation.

7. "Effluent" means wastewater – treated or untreated – that flows out of a treatment plant, sewer, or industrial outfall.

8. "Facility" means Tire Recyclers, Inc. (Permit-by-Rule No. 556), located at 2640 Roxbury Road, Charles City, Virginia, which is owned and operated by Green Zone Investments, LLC.

9. "GZI" means Green Zone Investments, LLC, a limited liability company authorized to do business in Virginia and its members, affiliates, partners, and subsidiaries. GZI is a "person" within the meaning of Va. Code § 10.1-1400.

10. "Notice of Violation" or "NOV" means a type of Notice of Alleged Violation under Va. Code § 10.1-1455.

11. "Order" means this document, also known as a "Consent Order" or "Order by Consent."

12. "Permit" means Permit-By-Rule (PBR) No.556, which was issued under the Virginia Waste Management Act and the Regulations to GZI on March 6, 2009.

13. "Pollutant" means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials (except those regulated under the Atomic Energy

Act of 1954, as amended (42 USC § 2011 *et seq.*)), heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water... 9 VAC 25-31-10.

14. "Pollution" means such alteration of the physical, chemical, or biological properties of any state waters as will or is likely to create a nuisance or render such waters (a) harmful or detrimental or injurious to the public health, safety, or welfare or to the health of animals, fish, or aquatic life; (b) unsuitable with reasonable treatment for use as present or possible future sources of public water supply; or (c) unsuitable for recreational, commercial, industrial, agricultural, or other reasonable uses, provided that (i) an alteration of the physical, chemical, or biological property of state waters or a discharge or deposit of sewage, industrial wastes or other wastes to state waters by any owner which by itself is not sufficient to cause pollution but which, in combination with such alteration of or discharge or deposit to state waters by other owners, is sufficient to cause pollution; (ii) the discharge of untreated sewage by any owner into state waters; and (iii) contributing to the contravention of standards of water quality duly established by the Board, are "pollution." Va. Code § 62.1-44.3.

15. "PRO" means the Piedmont Regional Office of DEQ, located in Glen Allen, Virginia.

16. "Regulations" or "VSWMR" means the Virginia Solid Waste Management Regulations, 9 VAC 20-81-10 *et seq,* or the VPDES Permit Regulation, 9 VAC 25-30-10 *et seq.*

17. "State Water Control Law" means Chapter 3.1 (§62.1-44.2 *et.seq.*) of Title 62.1 of the Va. Code.

18. "State waters" means all water, on the surface and under the ground, wholly or partially within or bordering the Commonwealth or within its jurisdiction, including wetlands. Va. Code § 62.f1-44.3.

19. "Va. Code" means the Code of Virginia (1950), as amended.

20. "VAC" means the Virginia Administrative Code.

21. "Virginia Waste Management Act" means Chapter 14 (§ 10.1-1400 *et seq.*) of Title 10.1 of the Va. Code. Article 2 (Va. Code §§ 10.1-1408.1 through - 1413.1) of the Virginia Waste Management Act addresses Solid Waste Management.

22. "VPDES" means Virginia Pollutant Discharge Elimination System.

23. "Water Quality Standard" means "provisions of state or federal law which consist of a designated use or uses for the waters of the Commonwealth and water quality criteria for such waters based upon such uses. Water quality standards are to

protect the public health or welfare, enhance the quality of water and serve the purposes of the State Water Control Law (Va. Code § 62.1-44.2 *et seq.*) and the federal Clean Water Act (33 USC § 1251 *et seq.*)."

**SECTION C: Findings of Fact and Conclusions of Law**

**WASTE:**

1. On March 6, 2009, the Department issued the Permit-By-Rule No. 556 (Permit) to GZI. The Permit was amended on May 14, 2009, July 10, 2009, and August 4, 2009. The Permit allows GZI to operate a tire shredding materials recovery facility, which is located at 2640 Roxbury Road, Charles City, Virginia.

2. The Facility has been operated as a tire recycling facility since the Permit was issued. Operations and maintenance at the Facility are subject to the Virginia Waste Management Act, the Regulations, and the Permit.

3. On October 18, 2012, Department staff inspected the Facility for compliance with the requirements of the Virginia Waste Management Act, the Regulations and the Permit. Based on the inspection and follow-up information, Department staff made the following observations:

   a. the facility's Disclosure Statement, dated April 16, 2009, had not been updated and failed to accurately list the key personnel;
   b. whole tires and waste tire chips stockpiled on the ground outside the processing building as there was insufficient internal storage area;
   c. an inspection of the Facility inspection logs indicated that inspections had not been performed since the previous DEQ inspection in April 2012; and
   d. the Facility's Operations Manual had not been certified.

4. Va. Code § 10.1-1408(C)(3) states that the Disclosure Statement shall be updated quarterly to indicate any change of condition that renders any portion of the disclosure statement materially incomplete or inaccurate.

5. 9 VAC 20-81-330(D)(6) states that internal storage areas for unprocessed incoming solid waste will be provided to ensure an environmentally sound operation and afford space to allow for proper processing of maximum anticipated daily incoming solid waste.

6. 9 VAC 20-81-300(B) states that all facilities, except exempted facilities, shall be maintained and operated in accordance with the permit issued or permit-by-rule status pursuant to this regulation. All facilities shall be maintained and operated in accordance with the approved design and intended use of the facility.

7. PBR 556 states in the Operations Plan that no waste tires will be stored on open ground.

8. 9 VAC 20-81-350(1) states that the facility owner or operator shall record self-inspections in an inspection log. These records shall be retained for at least three years from the date of inspection. They must include the date and time of the inspection, the name of the inspector, a description of the inspection including the identity of specific equipment and structures inspected, the observations recorded, and the date and nature of any remedial actions implemented or repairs made as a result of the inspection.

9. PBR 556 states in the Operations Plan that the plant manager or designee provide a twice weekly inspection of the site, including operating equipment, storm water conveyances, trailer storage areas, warehouse, packaging areas and equipment. The manager will maintain a facility logbook noting the time of inspection and whether any situations require correction; and once per month the manager will inspect the safety devices within the facility and note also in the logbook.

10. 9 VAC 20-81-485(B) states that an operations manual be prepared and maintained in the operating record. The Operations Manual shall certify the manual meets the requirements of the chapter. This manual shall be reviewed and re-certified annually (by December 31 of each calendar year) to ensure consistency with current operations and regulatory requirements and be made available to the department upon request.

11. On October 31, 2012, DEQ issued Notice of Violation (NOV) No. 2012-10-PRO-604 to GZI for the Facility for the violations described in paragraph C(3) through C(10), above.

12. On November 7, 2012, DEQ received GZI's letter in response to the NOV and an incomplete Disclosure Statement.

13. On December 5, 2012, DEQ met at the Facility with the County and representatives of GZI, to discuss resolution of the violations cited in the NOV and violations occurring with the County. In response to the meeting, on December 11, 2012, GZI submitted a proposed plan and schedule to address the violations.

14. On June 12, 2013, DEQ staff inspected the Facility for compliance with state regulations and the Permit. Follow-up compliance inspections occurred on July 25, 2013 and August 6, 2013. Based on these inspections, Department staff made the following observations:

    a. the facility's Disclosure Statement, dated November 2, 2012, failed to accurately list all key personnel;
    b. approximately 600 tires remained on the ground and not under cover, in addition to a large pile of waste metal-containing tire shreds on the ground;

c. Facility inspection logs were not on site during the June 2013 inspection; and during the August 6, 2013 inspection, the self-inspection logs were incomplete and inadequate;
d. during the July 25, 2013 inspection, the newly-installed processing equipment appeared to use more water than the old process; and during the August 6, 2013 follow-up inspection, the spilled process water and wash water were observed draining into the sump and being bulldozed off the floor of the processing building onto the open ground of the lot where it flowed across the lot to the drainage swales and to the sediment basin, and then was observed to discharge off-site.

15. Va. Code § 10.1-1408.1(C)(3) states that every applicant shall update its Disclosure Statement quarterly to indicate any change of condition that renders any portion of the Disclosure Statement materially incomplete or inaccurate.

16. Va. Code § 10.1-1400 defines Disclosure Statement as "A sworn statement or affirmation which includes: 1) The full name and business address of all key personnel; 3) A description of the business experience of all key personnel listed in the Disclosure Statement; 5) A listing and explanation of any notices of violation, prosecutions, administrative orders (whether by consent or otherwise), license or permit suspensions or revocations; or enforcement actions of any sort by any state, federal, or local authority, within the past 10 years....regarding an allegation of civil or criminal violation of any law, regulation or requirement relating to the collection, transportation, treatment, storage or disposal of solid waste or hazardous waste by any key personnel..."

17. Va. Code § 10.1-1400 defines Key Personnel as, "The applicant itself and any person employed by the applicant in a managerial capacity or empowered to make discretionary decisions, with respect to the solid waste or hazardous waste operations...the term also includes any officer, director, partner of the applicant, or any holder of five percent or more of the equity or debt of the applicant."

18. 9 VAC 20-81-330(D)(6) requires that internal storage areas for unprocessed incoming solid waste be provided to ensure an environmentally sound operation and afford space to allow for proper processing of maximum anticipated daily incoming solid waste.

19. 9 VAC 20-81-300(B) requires all facilities, except exempted facilities, be maintained and operated in accordance with the permit issued or permit-by-rule status pursuant to this regulation. All facilities shall be maintained and operated in accordance with the approved design and intended use of the facility.

20. PBR 557 states in the Operations Plan that no waste tires will be stored on open ground.

21. 9 VAC 20-81-350(1) requires that a facility owner or operator record self-inspection in an inspection log. These records are to be retained for at least three years from the date of inspection. They must include the date and time of the inspection, the name of the inspector, a description of the inspection including the identity of specific equipment and structures inspected, the observations recorded, and the date and nature of any remedial actions implemented or repairs made as a result of the inspection.

22. PBR 556 states in the Operations Plan that the plant manager or designee provide a twice weekly inspection of the site, including operating equipment, storm water conveyances, trailer storage areas, warehouse, packaging areas and equipment. The manager will maintain a facility logbook noting the time of inspection and whether any situations require correction; and once per month the manager will inspect the safety devices within the facility and note also in the logbook.

23. 9 VAC 20-81-330(D)(1) states that a materials recovery facility shall be so designed to reduce the potential elements that may degrade health or the environment from crossing the facility boundaries. Such elements include fire, vectors, wash water, odor and litter.

24. 9 VAC 20-81-330(D)(3) states that the unloading, receiving, or tipping areas shall be constructed of impervious materials, provided with a water supply for storage and transfer cleaning purposes, and equipped with drains or pumps, or equivalent means to facilitate the removal of wastewater to proper storage or disposal.

25. 9 VAC 20-81-340(D)(5) states that leachate and wash water from a materials recovery facility shall not be permitted to drain or discharge into surface waters except when authorized under a VPDES Permit issued pursuant to 9 VAC 25-31.

26. On August 30, 2013, DEQ issued NOV No. 2013-08-PRO-601 to GZI, based on the June 12, 2013 site inspection, and follow-up inspections on July 25, 2013 and August 6, 2013, for the violations described in paragraphs C(14) through C(25), above.

27. GZI responded to the NOV by letter dated September 6, 2013; and met with DEQ on October 17, 2013.

28. At the October 17, 2013 meeting, GZI reported compliance with the Permit. GZI provided a complete and accurate Disclosure Statement, reported the stockpiled tires were now undercover as required by the Permit and that the tire shreds had been removed; reported keeping the facility self-inspection logs available at the site and current, and reported to have eliminated/blocked the drainage of the process wastewater/leacheate to the sediment basin, and have reduced the water usage by approximately 90% while processing the tires. GZI reported that the facility now mists the tires when processing.

29. GZI provided DEQ an updated Certification of the Operations Manual on December 3, 2013.

30. Based on the results of the October18, 2012, June 12, 2013, July 25, 2013, and August 6, 2013 inspections, and the December 5, 2012 and October 17, 2013 meetings, the Virginia Waste Management Board concludes that GZI has violated Va. Code § 10.1-1408.1(C)(3), 9 VAC 20-81-330(D)(6), 9 VAC 20-81-300(B), 9 VAC 20-81-350(1), 9 VAC 20-81-485(B), 9 VAC 20-81-330(D)(1), 9 VAC 20-81-330(D)(3), 9 VAC 20-81-340(D)(5), and Permit-By-Rule 556,as described in paragraphs C(3) through C(10), C(14) through C(25), above.

31. DEQ staff inspected the facility on October 25, 2013, and reported that GZI was in compliance with the Permit.

**WATER:**

32. On July 12, 2010, DEQ staff performed an unannounced inspection of the Facility. During that inspection, DEQ staff informed the site manager that GZI would need to apply for a VPDES Industrial Stormwater Permit.

33. GZI discharges industrial stormwater from the property into a storm water basin that discharges into state waters, an unnamed tributary to Possum Run.

34. The unnamed tributary to Possum Run is located in the lower James River Basin. During the 2012 305(b)/303(d) Integrated Water Quality assessment, the unnamed tributary was assessed as fully supporting with observed effects for the Fish Consumption Use due to the Virginia Department of Health (VDH) advisory for kepone. The other designated uses were not assessed. The facility was not included in the Chesapeake Bay Total Maximum Daily Loads (TMDL), which was approved by the Environment Protection Agency (EPA) on 2/29/2010. The TMDL addresses dissolved oxygen and Submerged Aquatic Vegetation (SAV) impairments in the Chesapeake Bay and its tidal tributaries by allocating total nitrogen, total phosphorus, and total suspended solids to point and nonpoint sources, as well as atmospheric deposition and natural sources, throughout the Bay watershed. It was also not addressed the Chickahominy River and Tributaries Bacterial TMDL, which was approved by the EPA on 9/19/2012 and by the Board on 3/25/2013. The stream is considered a Tier 1 water due to its ephemeral nature and is not currently proposed for designation as a Tier 3 Exceptional Water.

35. On August 6, 2013 and August 14, 2013, DEQ staff again inspected the Facility and observed comingled process water and stormwater being discharged from two outfall structures, a pipe in the ditch leading to the stormwater basin and from the

stormwater basin discharge pipe, Outfall 001, into an unnamed tributary to Possum Run, without a VPDES permit.

36. During the August 14, 2013 compliance inspection, DEQ staff obtained samples of effluent from discharge point, Outfall 001, for laboratory analysis. The laboratory analysis of the sample showed a Dissolved Oxygen (DO) level of 2.96 mg/L.

37. Va. Code § 62.1-44.5 prohibits waste discharges or other quality alterations of state waters except as authorized by permit. VAC 25-31-50 provides that "except in compliance with a VPDES permit, or another permit, issued by the board, it shall be unlawful for any person to discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances."

38. 9 VAC 25-260-50 requires a minimum DO in 'Nontidal Waters (Coastal and Piedmont Zones)' of 4.0 mg/L.

39. On December 5, 3013, DEQ issued Notice of Violation (NOV) No. 2013-12-PRO-201 to GZI for the violations described in paragraphs C (35) through C (37) above.

40. On March 20, 2014, GZI and its consultants met with DEQ staff to discuss resolution of the violations cited in the NOV. The consultants for GZI reported that the comingled process water and stormwater had been addressed by the following actions: the process water has been reduced to a misting; the process wastewater either evaporates, or is captured by the floor drain and retained in the below ground grit holding tanks; the grit holding tanks are pumped and the process wastewater is hauled away as needed; the process wastewater no longer discharges to the stormwater basin. The consultants also reported that GZI would remove or cap the discharge pipe located in the ditch leading to the stormwater basin; repair or replace the damaged stormwater basin riser which would improve the settling of solids; and would evaluate the functionality of the current size and dimensions of the stormwater basin.

41. The unnamed tributary to Possum Run is a surface water located wholly within the Commonwealth and is a "state water" under State Water Control Law.

42. Based on the July 12, 2010, August 6, 2013 and August 14, 2013 inspections, and the meeting, the State Water Control Board concludes that the GZI has violated Va. Code § 62.1-44.5, 9 VAC 25-31-50 and 9 VAC 25-260-50, by discharging industrial stormwater runoff, co-mingled with process waste water, to state waters without a VPDES permit and in contravention of water quality standards, as described in paragraphs C(35) through (39), above.

43. In order for GZI to return to compliance, DEQ staff and GZI have agreed to the Actions of Compliance, which are incorporated in Appendix A of this Order.

**SECTION D: Agreement and Order**

Accordingly, by virtue of the authority granted it in Va. Code §10.1-1455, the Boards order GZI, and GZI agrees to:

1. Perform the actions described in Appendix A of this Order; and

2. Pay a civil charge of **$ 31,690** in settlement of the violations cited in this Order. The civil charge shall be paid in accordance with the following schedule:

| Due Date | Amount |
|---|---|
| October 10, 2014 | $ 5,282 |
| January 10, 2015 | $ 5,282 |
| April 10, 2015 | $ 5,282 |
| July 10, 2015 | $ 5,282 |
| October 10, 2015 | $ 5,282 |
| January 10, 2016 | $ 5,280 |

Payment shall be made by check, certified check, money order, or cashiers check payable to the "Treasurer of Virginia" and shall be delivered to:

Receipts Control
Department of Environmental Quality
Post Office Box 1104
Richmond, Virginia 23218

GZI shall include its Federal Employer Identification Number (FEIN) with the civil charge payment and shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Environmental Emergency Response Fund (VEERF).

**SECTION E: Administrative Provisions**

1. The Boards may modify, rewrite, or amend the Order with the consent of GZI for good cause shown by GZI, or on its own motion pursuant to the Administrative Process Act, Va. Code § 2.2-400 *et seq.*, after notice and opportunity to be heard.

2. This Order addresses and resolves only those violations specifically identified in Section C of this Order. This Order shall not preclude the Boards or the Director from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the Facility; or (3) taking subsequent action to enforce the Order.

3. For purposes of this Order and subsequent actions with respect to this Order only, GZI admits the jurisdictional allegations, findings of fact, and conclusions of law contained herein.

4. GZI consents to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Order.

5. GZI declares it has received fair and due process under the Administrative Process Act, Virginia Waste Management Act and the State Water Control Law and it waives the right to any hearing or other administrative proceeding authorized or required by law or regulation, and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Boards to modify, rewrite, amend, or enforce this Order.

6. Failure by GZI to comply with any of the terms of this Order shall constitute a violation of an order of the Boards. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Boards or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.

7. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.

8. GZI shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or other such occurrences. GZI shall show that such circumstances were beyond its control and not due to a lack of good faith or diligence on its part. GZI shall notify the DEQ Regional Director verbally within 24 hours and in writing within three business days when circumstances are anticipated to occur, are occurring, or have occurred that may delay compliance or cause noncompliance with any requirement of the Order. Such notice shall set forth:

   a. the reasons for the delay or noncompliance;

   b. the projected duration of any such delay or noncompliance;

   c. the measures taken and to be taken to prevent or minimize such delay or noncompliance; and

   d.. the timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director verbally within 24 hours and in writing within three business days, of learning of any condition above, which GZI intends to assert will result in the impossibility of compliance, shall constitute a waiver of any claim to inability to comply with a requirement of this Order.

9. This Order is binding on the parties hereto, their successors in interest, designees and assigns, jointly and severally.

10. This Order shall become effective upon execution by both the Director or his designee and GZI. Nevertheless, GZI agrees to be bound by any compliance date which precedes the effective date of this Order.

11. This Order shall continue in effect until:

    a. The Director or his designee terminates the Order after GZI has completed all of the requirements of the Order.

    b. GZI petitions the Director or his designee to terminate the Order after it has completed all of the requirements of the Order and the Director or his designee approves the termination of the Order; or

    c. The Director or Boards terminates the order in his or its sole discretion upon 30 days' written notice to GZI.

    Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve GZI from its obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. Any plans, reports, schedules or specifications attached hereto or submitted by GZI and approved by the Department pursuant to this Order are incorporated into this Order. Any non-compliance with such approved documents shall be considered a violation of the Order.

13. Any documents to be submitted pursuant to this Order shall also be submitted by GZI or an authorized representative of GZI.

14. This Order constitutes the entire agreement and understanding of the parties concerning settlement of the violations identified in Section C of this Order, and there are no representations, warranties, covenant, terms or conditions agreed upon between the parties other than those expressed in this Order.

15. By its signature below, GZI voluntarily agrees to the issuance of this Order.

And it is so ORDERED this_____day of _____, 2014.

_____
Michael P. Murphy, Regional Director
Department of Environmental Quality

Green Zone Investments, LLC voluntarily agrees to the issuance of this Order.

Date: 7/22/14 By: _____, Managing Member
(Person) (Title)
Green Zone Investments, LLC

Commonwealth of Virginia
City/County of Richmond

The foregoing document was signed and acknowledged before me this 22nd day of July, 2014, by Bilal Elomari who is Managing Member of Green Zone Investments, LLC, on behalf of the company.
(Name)

_____
Notary Public

348224
Registration No.

My commission expires: 2/29/2016

Notary seal:

P. ERICA PATHAMMAVONG
NOTARY PUBLIC
MY COMMISSION NUMBER 348224
COMMONWEALTH OF VIRGINIA

# APPENDIX A

Green Zone Investments, LLC shall:

1. By **August 10, 2014**, submit to DEQ, and implement, a plan and schedule to evaluate the functionality of the industrial stormwater settling basin and confirm that it is sufficient to insure compliance with Permit conditions.

2. By **December 10, 2014**, repair and/or replace the riser in the stormwater settling basin.

3. DEQ contact

   Unless otherwise specified in this Order, GZI shall submit all requirements of Appendix A of this Order to:

   Cynthia Akers
   Enforcement
   VA DEQ-PRO
   4949-A Cox Rd.
   Glen Allen, VA 23060
   Cynthia.Akers@deq.virginia.gov