

FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis Governor

Jeanette Nuñez Lt. Governor

Shawn Hamilton Secretary

Southwest District Office 13051 North Telecom Parkway #101 Temple Terrace, Florida 33637-0926

May 4, 2022

Carlos Aldazabal, VP of Energy Supply Tampa Electric Company 702 North Franklin Street Tampa, Florida 33602 cxaldazabal@tecoenergy.com

Re: Executed Consent Order OGC File No. 21-1222

TECO H.L. Culbreath Bayside Power Station

Facility ID No. FL0000809 Hillsborough County

Dear Mr. Aldazabal,

Enclosed please find the executed Consent Order OGC File No 21-1222, regarding the above referenced facility. The effective date of the Consent Order is the filing date entered by the designated Department Clerk on the signature page.

Should you have any questions, please contact Ms. Kimberly Cruz at (813) 470-5865, or via e-mail: <u>Kimberly.Cruz@floridadep.gov</u>. Thank you for your cooperation.

Sincerely,

For Kelley M. Boatwright Southwest District Director

Florida Department of Environmental Protection

KMB/kc

Enclosure: Consent Order and Exhibit B – Interim DMRs

Cc: Lea Crandall, FDEP OGC, <u>Lea.crandall@floridaDEP.gov</u>

Wastewater Compliance Assurance Program, FDEP, <u>WCAPHQ@dep.state.fl.us</u>

Kelley Boatwright, FDEP-SWD, Kelley.M.Boatwright@FloridaDEP.gov

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Marc Harris, FDEP/TAL, <u>Marc.Harris@FloridaDEP.gov</u> Frank Wall, FDEP/TAL, <u>Frank.Wall@FloridaDEP.gov</u> Amy Butler, TECO, <u>AMButler@tecoenergy.com</u>

BEFORE THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF FLORIDA DEPARTMENT)	IN THE OFFICE OF THE
OF ENVIRONMENTAL PROTECTION)	SOUTHWEST DISTRICT
)	
V.)	OGC FILE NO. 21-1222
)	
TAMPA ELECTRIC COMPANY)	
)	

CONSENT ORDER

This Consent Order ("Order") is entered into between the State of Florida Department of Environmental Protection ("Department") and Tampa Electric Company ("Respondent") to reach settlement of certain matters at issue between the Department and Respondent.

The Department finds and Respondent admits the following:

- 1. The Department is the administrative agency of the State of Florida having the power and duty to protect Florida's air and water resources and to administer and enforce the provisions of Chapter 403, Florida Statutes ("F.S."), and the rules promulgated and authorized in Title 62, Florida Administrative Code ("F.A.C."). The Department has jurisdiction over the matters addressed in this Order.
 - 2. Respondent is a person within the meaning of Section 403.031(5), F.S.
- 3. Respondent is the owner and is responsible for the operation of Tampa Electric Company H.L. Culbreath Bayside Power Station, an electric generating power plant ("Facility"). The generated wastewater consists of once-through condenser cooling water Units 1 and 2 comingled with non-contact bearing cooling water and intake screen wash water. Other wastewater streams include equipment washes, floor drains, boiler blowdown, water treatment wash water, equipment cooling, metal cleaning wastes, reverse osmosis reject wastewater, polisher waste, oily water separator streams, HRSG blowdown, cooling water tower blowdown, contact stormwater, and sanitary wastewater are discharged to the industrial wastewater pond system. Internal Outfall (I-038) is an existing industrial wastewater treatment pond system that discharges pond water effluent to the flume junction

box and ultimately through Outfall D-001. Intermittently treated once-through cooling water is withdrawn from Hillsborough Bay on the north side of the station and discharged to Hillsborough Bay, Class II Marine Waters, (WBID #1605D), on the south side of the station via a common discharge flume (D-001). Respondent operates the Facility under Department National Pollutant Discharge Elimination System ("NPDES") Industrial Wastewater Permit No. FL0000809 ("Permit") which was issued on September 26, 2016, expired on September 26, 2021, and has been administratively continued. The Facility is located at 3602 Port Sutton Road, Tampa, in Hillsborough County, Florida ("Property"). Respondent owns the Property on which the Facility is located.

- 4. The Department finds that the following violation(s) occurred:
- a) On July 3-4, 2021, Respondent reported to the State Watch Office an unauthorized discharge of 15,000 gallons of comingled industrial process wastewater and stormwater to Delaney Creek, a Class II, Predominately Marine Waterbody. This is a violation of Rule 62-604.130(1) Florida Administrative Code (F.A.C.), which prohibits the release or disposal of excreta, sewage, or other wastewaters or domestic wastewater residuals without providing proper treatment approved by the Department.
- b) Respondent reported samples collected from Internal Outfall I-038 were greater than the Total Recoverable Iron maximum daily limit of 1.0 mg/L: once in June 2021, twice in July 2021, and once in September 2021. This is a violation of Permit Number FL0000809, Part I(B); Rule 62-660.400(1)(e) line 18, F.A.C., which establishes effluent limitations for steam electric power generating point source discharges.
- c) Respondent reported the Increased Intermittent Discharge (IID) rate was greater than the permit limit of 0.67 Million Gallons per Day (MGD) from July 4, 2021 to July 9, 2021. This is a violation of Specific Permit Condition I.B.1.5., which establishes the flow limit and Rule 62-4.160, F.A.C., which states that it is a violation to fail to comply with the terms, conditions, requirements, limitations, and restrictions set forth in the Permit.

5. This Order only covers the findings of violation set forth in paragraph 4 above. The Department reserves the right to take enforcement action for any alleged violations not specifically addressed herein.

Having reached a resolution of the matter Respondent and the Department mutually agree and it is

ORDERED:

- 6. Respondent shall comply with the following corrective actions within the stated time periods:
- a) Within 90 days of the effective date of this Order, the Respondent shall submit a proposed Corrective Action Plan ("CAP") with a schedule for corrective action(s) to address all violations noted in paragraph 4 above. Upon review of the CAP, the Department may request additional information. Respondent shall submit additional information to the Department within 30 days of receipt of the Department's written request. Within 15 days of Department approval, the CAP shall be incorporated herein and made a part of this Order and Respondent shall implement the proposals in the CAP pursuant to the approved schedule. Respondent shall complete all corrective actions outlined in the approved CAP no later than 32 months after CAP approval.
- b) Respondent shall demonstrate at least four passing effluent sampling results meeting the Permit limitations for Total Recoverable Iron at internal outfall (I-038)
- c) Respondent shall demonstrate at least three IID events meeting the permit limitations set forth in the Facility permit before June 1, 2025.
- d) Respondent shall continue to meet the discharge limitations and other requirements of the Permit, except for the interim limitations identified in Table 1, until the Facility either achieves compliance with the Permit or Respondent shall cease wastewater discharges to surface waters of the State by June 1, 2025. Tests conducted pursuant to this monitoring program shall conform to Chapters 62-160, F.A.C. and Title 40 Code of Federal Regulations Part 136. These monitoring requirements do not act as State of Florida Department of Environmental Protection Wastewater Permit effluent limitations, nor do they authorize or

otherwise justify violation of the Florida Air and Water Pollution Control Act ("Act"), Part I, Chapter 403, F.S., during the pendency of this Order.

 Parameter
 Monthly Average
 Daily Max.
 Measurement Frequency
 Sample Type

 Iron, Total Report Only Recoverable
 Report Only Weekly
 Grab

Table 1 - Interim Discharge Monitoring and Reporting Requirements

- e) Analyses shall be reported monthly on the Interim Discharge Monitoring Report ("DMR"), (Exhibit B). Respondent shall electronically submit the DMRs to the Department of Environmental Protection using the DEP Business Portal at (http://www.fldepportal.com/go/), once each reporting period. The DMRs must be received by the Department no later than the 28th day following the end of the reporting period (e.g., an August report would be due no later than September 28th).
- 7. Every quarter after the effective date of this Consent Order, and continuing until all corrective actions have been completed, Respondent shall submit in writing to the Department a report containing information concerning the status and progress of projects being completed under this Order, information as to compliance or noncompliance with the applicable requirements of this Order including construction requirements and effluent limitations, and any reasons for noncompliance. These reports shall also include a projection of the work to be performed pursuant to this Order during the 12-month period which will follow the report. Respondent shall submit the reports to the Department within 28 days of the end of each quarter.
- 8. Respondent shall complete all corrective actions required by paragraphs 6 and 7 within the respective deadlines specified thereunder and shall be in full compliance with Chapters 62-660, Rule 62-4, and 62-604, F.A.C. and the conditions of the Permit by June 1, 2025.
- 9. Within 90 days of the effective date of this Order, Respondent shall submit a written estimate of the total cost of the corrective actions required by this Order to the

DEP vs. Tampa Electric Company Consent Order, OGC No. 21-1222 Page 5

Department. The written estimate shall identify the information the Respondent relied upon to provide the estimate.

- 10. Within 30 days of the effective date of this Order, Respondent shall pay the Department \$18,000.00 in settlement of the regulatory matters addressed in this Order. This amount includes \$17,500 for civil penalties and \$500.00 for costs and expenses incurred by the Department during the investigation of this matter and the preparation and tracking of this Order. The civil penalties are apportioned as follows: \$4,0000.00 for violation of Rule 62-604.130(1), F.A.C.; \$3,500.00 for violation of Rule 62-4.160, F.A.C., and \$10,000.00 for violation of Rule 62-660.400(1)(e), F.A.C.
- 11. In lieu of making cash payment of \$17,500.00 in civil penalties as set forth in paragraph 10 above, Respondent may elect to off-set this amount by implementing an in-kind penalty project, which must be approved by the Department. An in-kind project must be either an environmental enhancement, environmental restoration or a capital/facility improvement project and may not be a corrective action requirement of the Order or otherwise required by law. The Department may also consider the donation of environmentally sensitive land as an in-kind project. The value of the in-kind penalty project shall be one and a half times the civil penalty off-set amount, which in this case is the equivalent of at least \$26,250.00. If Respondent chooses to implement an in-kind project, Respondent shall notify the Department of its election either electronically or by certified mail within 15 days of the effective date of this Consent Order. Notwithstanding the election to implement an in-kind project, payment of the remaining \$500.00 in costs must be paid within 30 days of the effective date of the Consent Order.
- 12. If Respondent elects to implement an in-kind project as provided in paragraph 11, then Respondent shall comply with all the requirements and time frames in <u>Exhibit A</u> entitled In-Kind Projects.
- 13. Respondent shall make all payments required by this Order by cashier's check, money order or on-line payment. Cashier's check or money order shall be made payable to the "Department of Environmental Protection" and shall include both the OGC number

assigned to this Order and the notation "Water Quality Assurance Trust Fund." Online payments by e-check can be made by going to the DEP Business Portal at: http://www.fldepportal.com/go/pay/. It will take a number of days after this Order becomes final, effective and filed with the Clerk of the Department before ability to make online payment is available.

- 14. Except as otherwise provided, all submittals and payments required by this Order shall be sent to Industrial Wastewater Section, Compliance Assurance Program, Department of Environmental Protection, 13051 North Telecom Parkway, Suite 101, Temple Terrace, Florida 33637-0926.
- 15. Respondent shall allow all authorized representatives of the Department access to the Facility and the Property at reasonable times for the purpose of determining compliance with the terms of this Order and the rules and statutes administered by the Department.
- 16. In the event of a sale or conveyance of the Facility or of the Property upon which the Facility is located, if all of the requirements of this Order have not been fully satisfied, Respondent shall, at least 30 days prior to the sale or conveyance of the Facility or Property, (a) notify the Department of such sale or conveyance, (b) provide the name and address of the purchaser, operator, or person(s) in control of the Facility, and (c) provide a copy of this Order with all attachments to the purchaser, operator, or person(s) in control of the Facility. The sale or conveyance of the Facility or the Property does not relieve Respondent of the obligations imposed in this Order.
- 17. If any event, including administrative or judicial challenges by third parties unrelated to Respondent, occurs which causes delay or the reasonable likelihood of delay in complying with the requirements of this Order, Respondent shall have the burden of proving the delay was or will be caused by circumstances beyond the reasonable control of Respondent and could not have been or cannot be overcome by Respondent's due diligence. Neither economic circumstances nor the failure of a contractor, subcontractor, materialman, or other agent (collectively referred to as "contractor") to whom responsibility for performance is delegated to meet contractually imposed deadlines shall be considered circumstances beyond

the control of Respondent (unless the cause of the contractor's late performance was also beyond the contractor's control). Upon occurrence of an event causing delay, or upon becoming aware of a potential for delay, Respondent shall notify the Department by the next working day and shall, within seven calendar days notify the Department in writing of (a) the anticipated length and cause of the delay, (b) the measures taken or to be taken to prevent or minimize the delay, and (c) the timetable by which Respondent intends to implement these measures. If the parties can agree that the delay or anticipated delay has been or will be caused by circumstances beyond the reasonable control of Respondent, the time for performance hereunder shall be extended. The agreement to extend compliance must identify the provision or provisions extended, the new compliance date or dates, and the additional measures Respondent must take to avoid or minimize the delay, if any. Failure of Respondent to comply with the notice requirements of this paragraph in a timely manner constitutes a waiver of Respondent's right to request an extension of time for compliance for those circumstances.

- 18. The Department, for and in consideration of the complete and timely performance by Respondent of all the obligations agreed to in this Order, hereby conditionally waives its right to seek judicial imposition of damages or civil penalties for the violations described above up to the date of the filing of this Order. This waiver is conditioned upon Respondent's complete compliance with all of the terms of this Order.
- 19. This Order is a settlement of the Department's civil and administrative authority arising under Florida law to resolve the matters addressed herein. This Order is not a settlement of any criminal liabilities which may arise under Florida law, nor is it a settlement of any violation which may be prosecuted criminally or civilly under federal law. Entry of this Order does not relieve Respondent of the need to comply with applicable federal, state, or local laws, rules, or ordinances.
- 20. The Department hereby expressly reserves the right to initiate appropriate legal action to address any violations of statutes or rules administered by the Department that are not specifically resolved by this Order.

- 21. Respondent is fully aware that a violation of the terms of this Order may subject Respondent to judicial imposition of damages, civil penalties up to \$15,000.00 per day per violation, and criminal penalties.
- 22. Respondent acknowledges and waives its right to an administrative hearing pursuant to sections 120.569 and 120.57, F.S., on the terms of this Order. Respondent also acknowledges and waives its right to appeal the terms of this Order pursuant to section 120.68, F.S.
- 23. Electronic signatures or other versions of the parties' signatures, such as .pdf or facsimile, shall be valid and have the same force and effect as originals. No modifications of the terms of this Order will be effective until reduced to writing, executed by both Respondent and the Department, and filed with the clerk of the Department.
- 24. The terms and conditions set forth in this Order may be enforced in a court of competent jurisdiction pursuant to sections 120.69 and 403.121, F.S. Failure to comply with the terms of this Order constitutes a violation of section 403.161(1)(b), F.S.
- 25. This Consent Order is a final order of the Department pursuant to section 120.52(7), F.S., and it is final and effective on the date filed with the Clerk of the Department unless a Petition for Administrative Hearing is filed in accordance with Chapter 120, F.S. Upon the timely filing of a petition, this Consent Order will not be effective until further order of the Department.
- 26. Respondent shall publish the following notice in a newspaper of daily circulation in Hillsborough County, Florida. The notice shall be published one time only within 10 days of the effective date of the Order. Respondent shall provide a certified copy of the published notice to the Department within 10 days of publication.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF CONSENT ORDER

The Department of Environmental Protection ("Department") gives notice of agency action of entering a Consent Order with TAMPA ELECTRIC COMPANY pursuant to section

120.57(4), Florida Statutes. The Consent Order addresses the unauthorized discharge, flow exceedances, and exceedances of the permitted Iron limit at 3602 Port Sutton Road, Tampa, in Hillsborough County, Florida. The Consent Order is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, Southwest District, 1305 North Telecom Parkway, Suite 101, Temple Terrace, Florida 33637-0926.

Persons who are not parties to this Consent Order, but whose substantial interests are affected by it, have a right to petition for an administrative hearing under sections 120.569 and 120.57, Florida Statutes. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition concerning this Consent Order means that the Department's final action may be different from the position it has taken in the Consent Order.

The petition for administrative hearing must contain all of the following information:

- The name and address of each agency affected and each agency's file or identification number, if known;
- b) The name, address, any e-mail address, any facsimile number, and telephone number of the petitioner, if the petitioner is not represented by an attorney or a qualified representative; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- c) A statement of when and how the petitioner received notice of the agency decision;
- d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
- f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

The petition must be filed (<u>received</u>) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS# 35, Tallahassee, Florida 32399-3000 or <u>received</u> via electronic correspondence at <u>Agency_Clerk@floridadep.gov</u>, within <u>21 days</u> of receipt of this notice. A copy of the petition must also be mailed at the time of filing to the District Office at Southwest District, 1305 North Telecom Parkway, Suite 101, Temple Terrace, Florida 33637-0926. Failure to file a petition within the 21-day period constitutes a person's waiver of the right to request an administrative hearing and to participate as a party to this proceeding under sections 120.569 and 120.57, Florida Statutes. Before the deadline for filing a petition, a person whose substantial interests are affected by this Consent Order may choose to pursue mediation as an alternative remedy under section 120.573, Florida Statutes. Choosing mediation will not adversely affect such person's right to request an administrative hearing if mediation does not result in a settlement. Additional information about mediation is provided in section 120.573, Florida Statutes and Rule 62-110.106(12), Florida Administrative Code.

27. Rules referenced in this Order are available at http://www.dep.state.fl.us/legal/Rules/rulelist.htm.

FOR THE RESPONDENT:

Carlos Aldazabal

Vice President of Energy Supply

Date

DONE AND ORDERED this 4th day of May, 2022, in Orange County, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Pamala Vazguez

Kelley M. Boatwright

District Director

Southwest District

Filed, on this date, pursuant to section 120.52, F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Vilma Dis Clerk

May 4, 2022

Date

Copies furnished to:

Lea Crandall, Agency Clerk Mail Station 35

Exhibit A

In-Kind Projects

I. Introduction

Proposal

- a. Within 60 days of the effective date of this Consent Order, or, of the Department's notification that applying stipulated penalties to an in-kind project is acceptable, Respondent shall submit, either electronically or by certified mail, a detailed in-kind project proposal to the Department for evaluation. The proposal shall include a summary of benefits, proposed schedule for implementation and documentation of the estimated costs which are expected to be incurred to complete the project. These costs shall not include those incurred in developing the proposal or obtaining approval from the Department for the in-kind project.
- b. If the Department requests additional information or clarification due to a partially incomplete in-kind project proposal or requests modifications due to deficiencies with Department guidelines, Respondent shall submit, either electronically or by certified mail, all requested additional information, clarification, and modifications within 15 days of receipts of written notice.
- c. If upon review of the in-kind project proposal, the Department determines that the project cannot be accepted due to a substantially incomplete proposal or due to substantial deficiencies with minimum Department guidelines; Respondent shall be notified, in writing, of the reason(s) which prevent the acceptance of the proposal. Respondent shall correct and redress all the matters at issue and submit, either electronically or by certified mail, a new proposal within 30 days of receipt of written notice. In the event that the revised proposal is not approved by the Department, Respondent shall

make cash payment of the civil penalties as set forth in paragraph 10 above, within 30 days of Department notice.

- d. Within 180 days of obtaining Department approval for the in-kind proposal or in accordance with the approved schedule submitted pursuant to paragraph (a) above, Respondent shall complete the entire in-kind project.
- e. During the implementation of the in-kind project, Respondent shall place appropriate sign(s) at the project site indicating that Respondent's involvement with the project is the result of a Department enforcement action. Respondent may remove the sign(s) after the project has been completed. However, after the project has been completed Respondent shall not post any sign(s) at the site indicating that the reason for the project was anything other than a Department enforcement action.
- f. In the event, Respondent fails to timely submit any requested information to the Department, fails to complete implementation of the in-kind project or otherwise fails to comply with any provision of this paragraph, the in-kind penalty project option shall be forfeited, and the entire amount of civil penalties shall be due from the Respondent to the Department within 30 days of Department notice. If the in-kind penalty project is terminated and Respondent timely remits the civil penalty, no additional penalties shall be assessed for failure to complete the requirement of this paragraph.
- g. Within 15 days of completing the in-kind project, Respondent shall notify the Department, either electronically or by certified mail, of the project completion and request a verification letter from the Department. Respondent shall submit supporting information verifying that the project was completed in accordance with the approved proposal and documentation showing the actual costs incurred to complete the project. These costs shall not include those incurred in developing the proposal or obtaining approval from the Department for the project.

h. If upon review of the notification of completion, the Department determines that the project cannot be accepted due to a substantially incomplete notification of completion or due to substantial deviations from the approved in-kind project; Respondent shall be notified, in writing, of the reason(s) which prevent the acceptance of the project. Respondent shall correct and redress all the matters at issue and submit, either electronically by certified mail, a new notification of completion within 15 days of receipt of the Department's notice. If upon review of the new submittal, the Department determines that the in-kind project is still incomplete or not in accordance with the approved proposal, the in-kind penalty project option shall be forfeited, and the entire amount of civil penalty shall be due from the Respondent to the Department within 30 days of Department notice. If the in-kind penalty project is terminated and Respondent timely remits the civil penalties, no additional penalties shall be assessed for failure to complete the requirements of this paragraph.

EXHIBIT B: INTERIM DISCHARGE MONITORING REPORTS

DEPARTMENT OF ENVIRONMENTAL PROTECTION DISCHARGE MONITORING REPORT - PART A

When Completed mail this report to: Department of Environmental Protection, Wastewater Compliance Evaluation Section, MS 3551, 2600 Blair Stone Road, Tallahassee, FL 32399-2400 Tampa Electric Company (TEC) PERMIT NUMBER: FL0000809-012-IW1S PERMITTEE NAME: MAILING ADDRESS: P.O. Box 111 Tampa, Florida 33601 LIMIT: REPORT FREQUENCY: Interim Monthly CLASS SIZE: PROGRAM: MA Industrial FACILITY: H.L. Culbreath Bayside Power Station MONITORING GROUP NUMBER: I-038 LOCATION: 3602 Port Sutton Rd MONITORING GROUP DESCRIPTION: POND WATER BLOWDOWN or RO CONCENTRATE BLOWDOWN Tampa, FL 33619 RE-SUBMITTED DMR: NO DISCHARGE FROM SITE: COUNTY: Hillsborough MONITORING PERIOD From: To: OFFICE: Southwest District

Parameter		Quantity of	or Loading	Units	Q	Quality or Concentration		Units	No. Ex.	Frequency of Analysis	Sample Type
Iron, Total Recoverable	Sample										
	Measurement										
PARM Code 00980 1	Permit					Report	Report	mg/L		Weekly	Grab
Mon. Site No. EFF-6	Requirement					(Mo.Avg.)	(Day.Max.)				

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.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):