



GUAM ENVIRONMENTAL PROTECTION AGENCY • AHENSIAN PRUTEKSIÓN LINA'LA' GUÁHAN

LOURDES A. LEON GUERRERO • GOVERNOR OF GUAM | JOSHUA F. TENORIO • LIEUTENANT GOVERNOR OF GUAM
WALTER S. LEON GUERRERO • ADMINISTRATOR | MICHELLE C. R. LASTIMOZA • DEPUTY ADMINISTRATOR

MAY 20 2021

**Primos Heavy Equipment Rental Services
(Respondent)**

Attention: Mr. Felix Quan

P.O. Box 11427

Yigo, Guam 96929

Contact # 649-7114

Noemi L. SANTAMARIA

RECEIVED BY:

DATE:

5-21-21

8:51 AM

Subject: Notice of Violation / Compliance Order / Penalty Order

The stated purpose of the Guam Soil Erosion and Sediment Control Regulations (GSESCR), 22 GAR Chapter 10, as implemented by Public Law 25-152, is "to control accelerated soil erosion, thereby preventing the pollution of Guam's waters from fertilizers, pesticides, sediments and other polluting substances carried by sediment, and to protect property and to promote the public health, safety and welfare by regulating grading, clearing, grubbing and stockpiling, and by setting minimum standards for erosion and sedimentation control for the island of Guam." As described herein, the Guam Environmental Protection Agency (GEPA) finds that Primos Heavy Equipment Rental Services ("Respondent") has violated the GSESCR and is ordered to stop work, undertake remedial action(s), and pay a penalty as stated herein.

BACKGROUND

On May 11, 2021, Guam EPA/Water Pollution Control inspectors conducted an inspection at Lot No. 1110-NEW-22 NEW, in the Municipality of Mangilao, located along Rt. 10 next to the GTA substation (approx. total lot area 2.0 acres) and observed earth-moving operations including (but not limited to) clearing, grading, and grubbing underway in an area approximately one (1) acre or larger in size. The earth-moving operations were being conducted by Primos Heavy Equipment Rental Services (PHERS), representatives of which identified the owner as JT Pacific Development, represented by Mr. James Ji. GEPA staff visited the office of Mr. Ji on May 11, 2021 and spoke with Ms. Linda Buena, who provided an undated copy of an application for a Department of Public Works (DPW) Grading Permit, Application Number G21000012, which did not bear the approval signature of GEPA or DPW. GEPA later confirmed with DPW that the permit had not yet been issued. GEPA staff informed Ms. Buena that earth-moving operations at the site needed to stop until a permit was obtained, and that best management practices for dust, erosion and sediment control needed to be installed to provide mitigation for the work already completed. GEPA later confirmed with DPW that Permit No. G21000012 had not yet been issued.

On May 13, 2021, GEPA staff issued a Stop Work Order to Primos Heavy Equipment Rental Services (PHERS) for conducting earth-moving operations without a permit at the subject lot. In addition to stopping work, the order required PHERS to apply for an "after the fact" permit to DPW, in accordance with 22 GAR §10110(C).

A follow up inspection was conducted by GEPA on May 17, 2021, which revealed that PHERS had not complied with the Stop Work Order, and continued to conduct earth-moving operations at the site, and that BMPs had not been installed. PHERS was again notified verbally that they must stop work in accordance with the May 13, 2021 Stop Work Order and they must install BMPs.

GEPA inspected again on May 18, 2021, and found that PHERS was continuing to perform earth-moving operations at the site without the installation of BMPs. At that time, GEPA inspectors contacted PHERS supervisor Mr. Patrick Salas. According Mr. Salas, Mr. James Ji, representing JT Pacific Development, ordered PHERS to continue the clearing activities. Mr. Salas stated that PHERS is an equipment rental company only and being paid by hour, and that acquiring a valid permit was the owners responsibility not PHERS.

See attachments for additional details.

NOTICE OF VIOLATION

Based on the facts described above, GEPA finds that Respondent violated the following provisions of the Guam Soil Erosion and Sediment Control Regulations, 22 GAR Chapter 10, as implemented by Public Law 25-152:

1. 22 GAR §10103(A) Permit Issuance and Denials: Permits Required. (1) *Unless exempted, no person shall commence or perform any grading, clearing, grubbing, embankment, filling, excavation or other earth-moving activity without a grading permit;* (2) *Unless exempted, no person shall commence or perform any stockpiling without a stockpiling permit.*

Respondent performed earth-moving activities including grading, clearing and grubbing, without a grading permit. The earth-moving activities conducted by Responded are not exempted from the requirement to obtain a permit. GEPA notes that the definition of a "person" under 22 GAR §10102(A)(55) does not distinguish between an owner, contractor, heavy equipment rental service, or other such role: *"Person: any individual, partnership, firm, association, municipality, public or private corporation, subdivision or agency of the island of Guam or the Federal Government, trust, estate or any other legal entity."*

2. 22 GAR §10110(C) Stop Work Order: Work occurring without a permit. *...if an earth-moving operation is occurring without a valid permit the Agency can order the operation to immediately cease and either require the violator to obtain an after the fact permit, or if the operation cannot be permitted, to have the violator take corrective measures to return the land to its previous condition.*

Respondent continued to perform earth-moving operations at the site in violation of the May 13, 2021 Stop Work Order issued under 22 GAR §10110(C), even after verbal instructions from GEPA staff on two separate follow-up inspections.

3. 22 GAR §10105(A)(1) Erosion and Sediment Control Plans and Measures: General policies for Erosion and Sediment Control. *All earth-moving operations on Guam shall be conducted in a manner that prevents accelerated land erosion, transportation of sediment to and along highways, or siltation of rivers, estuaries and marine waters.*

Respondent failed to conduct the earth moving activities undertaken at the site in a manner that prevents accelerated land erosion and siltation of marine waters. Specifically, the earth-moving activities were being conducted without the installation or use of any erosion and sediment control best management practices (BMPs) at all.

4. 22 GAR §10104(C)(1) Erosion and Sediment Control Plans: Compliance. *All clearing, grading, embankment or filling, excavating and other earth moving operations, except those otherwise exempted from these regulations by the Administrator, must proceed in accordance with a duly approved Erosion and Sediment Control Plan.*

Respondent conducted earth-moving activities without having obtained a Grading Permit and therefore without a duly approved Erosion and Sediment Control Plan. Moreover, Respondent failed to implement any erosion and sediment control best management practices (BMPs) at all.

5. 22 GAR §10105(B)(5)(d) Required Contents of Erosion and Sediment Control Plans: Compliance. *If a project to be developed is covered under the Federal Storm Water Regulations (40 CFR Parts 122 & 123), a notice of intent to discharge storm water to surface and marine waters of Guam must be submitted to US Environmental Protection Agency and a copy furnished GEPA. An NPDES permit which authorizes the discharge must also be secured.*

Respondent conducted earth-moving activities without first having provided to GEPA a copy of a notice of intent (NOI) for coverage as required under the USEPA NPDES Construction General Permit (CGP), which applies to all construction activities which disturb one acre or more.

COMPLIANCE ORDER:

Based on the foregoing Violations and pursuant to the authority granted to GEPA by 10 GCA Chapter 47 and Public Law 25-152, Respondent is HEREBY ORDERED to undertake the following remedial actions:

1. **Immediately upon receipt of this order:** Cease all earth moving and construction work pursuant to 22 GAR §10110(C) ("Stop Work Order") and do not resume until a valid after-the-fact permit has been obtained.
2. **Within seven (7) days of receipt of this order:** Pursuant to 22 GAR §10113(A) "Corrective Measures", install temporary erosion and sediment control best management practices (BMPs) consisting of, at a minimum, silt fence along the down-gradient boundaries of all cleared areas, and appropriate dust control measures to protect neighboring properties. Silt fence installation must be in accordance with the specifications provided for in Appendix A7 (2010 updated version) of the 2006 CNMI and Guam Stormwater Management Manual, implemented through Executive Order 2012-02. If the slope and length of flow contributing runoff to the silt fence exceeds the requirements prescribed in Appendix A7, the installation of temporary sediment traps as detailed in Appendix A6 must be installed. The manual and updated Appendix A7 can be found on Guam EPA's website at epa.guam.gov.

3. **Within fifteen (15) days of receipt of this order:** Apply for an after-the-fact permit pursuant to 22 GAR §10110(C) ("Stop Work Order") and pay the required permit fees, which pursuant to §10108(F) ("Work occurring without a permit") and §10109(C) ("Permit expiration") amount to two times the normal fees specified under §10110.
4. **Within fifteen (15) days of receipt of this order:** Submit an Erosion and Sediment Control (E&SC) Plan in accordance with 22 GAR §10104(C)(1) directly to GEPA for immediate review. The plan must be prepared and certified by a licensed professional engineer (P.E.) and must meet all relevant requirements of the Guam Soil Erosion and Sediment Control Regulations (GSESCR), 22 GAR Chapter 10, as implemented by Public Law 25-152, and the 2006 CNMI and Guam Stormwater Management Manual, implemented through Executive Order 2012-02. Any corrections to the E&SC plan required by GEPA as a result of review must be completed within five (5) days of notification by GEPA.
5. **Within thirty (30) days of receipt of this order:** Complete implementation of the Erosion & Sedimentation Plan (E&SC) required under Order Item No. 4 above. This includes installation of all best management practices (BMPs) such as (but not limited to) silt fence, diversion swales, sediment traps, and stabilized construction entrance. Failure to submit the E&SC plan on time, or to resolve any E&SC plan deficiencies following notice by GEPA will not be accepted as a reason for extending the date of compliance with this item.
6. **Within forty five (45) days of receipt of this order:** Provide to GEPA written proof that the proposed earth-moving operations have been approved by the USEPA under a notice of intent (NOI) as required under the USEPA NPDES Construction General Permit (CGP), and as required by 22 GAR §10105(B)(5)(d).

PENALTY ORDER:

Based on the foregoing Violations and pursuant to the authority granted to GEPA by 10 GCA Chapter 47 and Public Law 25-152, GEPA hereby notifies Respondent of the Administrator's decision to issue a penalty order pursuant to 22 GAR §10114(b), which authorizes a civil penalty of no more than Ten Thousand Dollars (\$10,000) per day per violation, up to a maximum civil penalty of One Hundred Twenty-five Thousand Dollars (\$125,000).

GEPA is imposing a total civil penalty amount of Ten Thousand Dollars (\$10,000) per violation, per day. In accordance with 22 GAR §10114(b)(2), this penalty is proposed based on the following factors considered by GEPA: 1) Respondent's failure to respond to the initial Stop Work Order; 2) Respondent's continued failure to respond to reminders and verbal instructions to stop work in accordance with the initial Stop Work Order; 3) Respondent's refusal to abate the violation or correct the conditions resulting from the violation; and 4) the potential for significant direct impact to adjacent properties and water resources. In addition, GEPA also took into consideration the economic benefit or savings to Respondent by failing to obtain a permit or implement an Erosion and Sediment Control plan.

The proposed \$10,000 penalty is being assessed for all five (5) violations over the time period starting with GEPA's Stop Work Order dated May 13, 2021, through May 18, 2021 when respondent was reminded for the third time of the Stop Work Order, for a total of six (6) days. For five (5) total violations over a period of six (6) days, this amounts to a total of \$300,000.

The total penalty amount is therefore One Hundred Twenty-five Thousand Dollars (\$125,000), which is the maximum civil penalty authorized under 22 GAR §10114(b).

This order does not prevent GEPA from taking additional actions including the issuance of penalties under 22 GAR §10114(A)(a) or (b). Please also note that if you fail to take the remedial actions listed above within the required timeframe(s), additional violations, remedial actions, and penalties may be assessed by Guam EPA.

RIGHT TO APPEAL:

You may file within thirty days of the date of your receipt of this Notice of Violation/Compliance Order/Penalty Order, a Notice of Intent to Appeal also known as a Notice of Defense with the Guam EPA's Board of Directors. A copy of the Notice of Intent to Appeal/Notice of Defense is attached for your convenience.

Unless a written request for a hearing signed by or on behalf of the person, agency or business entity named above in this Notice of Violation/Compliance Order/Penalty Order is hand delivered or mailed to GEPA within thirty days after the Notice of Violation/Compliance Order/Penalty Order was personally served on you or mailed to you, GEPA may proceed upon the Notice of Violation/Compliance Order/Penalty Order without a hearing. A request for hearing may be made by delivering the enclosed form entitled "Notice of Intent to Appeal also known as A Notice of Defense", or by delivering a notice of defense as provided in 5 GCA §9205, to the following address:

Guam Environmental Protection Agency Board of Directors
C/o Administrator Guam Environmental Protection Agency
Building 17-3304 Mariner Avenue
Tiyan Barrigada, Guam 96913

If you file a Notice of Intent to Appeal/Notice of Defense, the GEPA's Board of Directors shall hold a public hearing, at which time you may appear and present evidence in person or through counsel in support of this petition.

Failure to file a Notice of Intent to Appeal within the period specified above will constitute a waiver of your right to a hearing. If you waive your rights to a hearing the Notice of Violation/Compliance Order/Penalty Order will become final, and GEPA may proceed upon the Order without a hearing and without further notice to you.

Should you have any questions or need additional information, please do not hesitate to contact me and my staff at Water Pollution Control Program or Water Division Chief Engineer, CAPT Brian Bearden, P.E., BCEE at 300-4786 and 300-4779, respectively.

Dångkolu na si Yu'us ma'åse'.

Senseramente,



WALTER S. LEON GUERRERO
Administrator

Attachments: Notice of Defense Form
Stop Work Order dated May 13, 2021
Inspection Report dated May 19, 2021
DPW Grading Permit Application G21000012 (undated)

cc: GEPA Legal Counsel



Guam Environmental Protection Agency
P.O. Box 22439, GMF,
Barrigada, Guam 96921



NOTICE OF INTENT TO APPEAL (AKA NOTICE OF DEFENSE)

I, _____, have received your Notice of Violation, Order of Compliance and/or Administrative Penalty Order dated _____, charging me for violations and/or imposing penalties and/or other orders, and I wish to:
(Please check appropriate sections)

☐ **A. Request for a hearing and**

- ☐ 1. Object to the accusation on the ground that it does not state acts or omissions upon which the Agency can proceed.
- ☐ 2. Object to the form of the accusation on the ground that it is so indefinite or ambiguous that I cannot identify the infraction or prepare my defense.
- ☐ 3. Wish to prepare new matter in my defense.
- ☐ 4. Admit to the accusation in part.

☐ **B. Admit to the accusation in whole.**

My mailing address is:

SIGNATURE

DATE

GUAM EPA CASE NO.: _____



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WALTER S. LEON GUERRERO • ADMINISTRATOR | MICHELLE C. R. LASTIMOZA • DEPUTY ADMINISTRATOR**

**Water Pollution Control Program
Water Division
Guam Environmental Protection Agency
Inspection Report**

Complaint of clearing without the proper permits and not Erosion Sediment Controls in place at Lot No. 1110-NEW-R2 NEW, Mangilao Rt. 10 next to GTA Substation.

**Date of Inspection: May 11, 2021
Time of Inspection: 11:27 AM
Inspected by: GEPA Staff(s): Verony Charfauros and Helen Gumataotao, WPC Inspectors**

Background:

Property owned by James Ji of JT Pacific Development who hired Contractor Primo's Heavy Equipment Rental Services to clear his property. On May 11, 2021 at 11:27 AM, inspector Verony Charfauros spoke with Primo's dozer operator(s) Mr. San Nicolas, Jose Mata to see if they have a permit for this project. As per Mr. San Nicolas and Mr. Mata they do not know if the company has one, only that Primo's was hired by the owner Mr. Ji to clear the property. GEPA Inspector Mr. Charfauros informed Mr. San Nicolas to stop work and call his boss. Mr. San Nicolas called his Supervisor Mr. Patrick Salas to inform him of the situation at the jobsite.

GEPA Inspector Verony Charfarous spoke with Mr. Salas and informed him they need to apply for a clearing permit. As part of the their BMP's to prevent any runoff from leaving the property, plywood must be put up around the project site for dust control so it will not affect the neighboring houses in the area. Mr. Charfauros, later went to the office of Mr. Ji and spoke with Linda Buena, and asked if they have a clearing permit for this project in Mangilao and all she had was the DPW Permit application without Guam EPA's approval. (See attached DPW Application form) It was informed to Ms. Buena they needed to stop work and apply for a clearing permit and clearance from Guam EPA before they are to continue on. It was also mentioned to Ms. Buena and Mr. Salas that BMP's needed to in place at the project site to keep run off on the property and a plywood wall for dust control.

On May 17, 2021 at 12:24 PM, GEPA Inspector(s): Verony Charfauros and Helen Gumataotao followed up on this project and noticed Primo's Dozer Operator was still working on this project after we had issued the Stop Work Order to Primo's Office on May 13, 2021 that was received by Noemi Santa Maria at 9:30 AM. (See attached copy of Stop Work Order) BMP's were not properly installed at the project site as mentioned to both Mr. Salas, Primo's and Ms. Buena, JT Pacific Development. Reported the incident to our Supervisor Mr. Johnny Abedania who instructed us to take pictures. (See attached photos dated May 17, 2021)

On May 18, 2021 at 8:34 AM, followed up once again of this project and still Primo's Dozer Operator was seen working disregarding the Guam EPA Stop Work Order. (See attached photos dated May 18) It was then that I had called Mr. Salas to inform him no work was to be taking place until Primo's addressed the Stop Work Order. As per Mr. Salas, their boss instructed them to go ahead with the work since Mr. James Ji is renting them by the hour and to go ahead and fine Mr. Ji the owner since he was the one who hired them.

Report prepared by:


Helen R. Gumataotao, WPC Inspector

Date: May 19, 2021



444.00
34.50 PCE
69.00 PCE
103.50
12/10/2021

BUILDING SAFETY
IS NO ACCIDENT



BUILDING INSPECTION & PERMITS SECTION
APPLICATION AND PERMIT FOR CLEARING AND GRADING

COPY

PERMIT NUMBER 221000012

LOCATION			ENG. SOLID REPORT		Est. Quantity	Permit Fee	Fee Received
District	Block	Lot	Tract	Date Filed	Excav. Cu. Y.D.		
MANGILAO	1110-NEW	12 NEW				\$	\$
					Fill Cu. Y.D.	\$	By: Date:

Located at PT 10 Mangilao NEXT TO GTJA SUBSTATION

Lot Area: 87,120 Sq. Ft. 2 Acres Overall Dimensions: _____

Description of Soil: _____ Fill Material: ON SITE
Existing Ground: SOIL AND ROCK

Estimated Starting Date: _____ 20 _____ Estimated Completion Date: _____ 20 _____

Remarks: Clearing & grading.

Owner: JT Pacific Development Address: Box 6483 Tamuning Phone: 477-9219
688-0571

Engineer: EDDY N SY Address: Box 8495 Tamuning Phone: 727-1220

Contractor: PRIMO HEAVY CONSTRUCTION Address: Box 11427 Yigo Phone: 898-9382

License Number: 7514

Date of Application: _____ 20 _____ Applicant: [Signature]

Application Revised By: _____ Date: _____ 20 _____

TO THE APPLICANT: Permission is hereby given to the above work according to the conditions hereon and according to the approved plans and specification pertaining thereto, subject to compliance with Chapter 70 of the U.B.C. No burning allowed on site unless a burning permit has been issued by the Fire Department.

REMARKS: Not valid without the approval of the Department of Public Works

* LINDA BUENA 12:01 pm

Issued By: _____

Building Permit & Inspection Administrator

APPROVAL BY OTHER AGENCIES (Route as indicated)

AGENCY	DATE	SIGNATURE	COMMENTS
Land Management, Zone	12/15/21	GARCIA	APPROVED
Parks and Recreation	3/10/21	[Signature]	Approved as per Remarks
Guam Power Authority	3/11/21	[Signature]	GRADING & GRADING ASST. WORK ARRANGE & MATERIAL AT LEAST 5 FT
G.P.A.			
Dept. of Agriculture	03/18/2021	CAN	approved - land clearing
GGN Survey Division	2/1/21	[Signature]	APPROVED
Contractor's License Board	2/11/21	[Signature]	License valid until 6/30/2021
Dept. of Public Works - DIA			
GUAM GENE BOARD	02-12-21	[Signature]	VALID REGISTRATION



COPY

GUAM ENVIRONMENTAL PROTECTION AGENCY - AHENSIAŇ PRUTEKSIÓN LINA'LA' GUÅHAN
LOURDES A. LEON GUERRERO - GOVERNOR OF GUAM | JOSILUA F. TENORIO - LIEUTENANT GOVERNOR OF GUAM
WALTER S. LEON GUERRERO - ADMINISTRATOR | MICHELLE C. R. LASTIMOZA - DEPUTY ADMINISTRATOR

STOP WORK ORDER

Notice of Violation issued to ("Respondent"): Control Number: 2021-0002
Owner name: PATRICK SALAS / PRIMOS HEAVY EQUIPMENT RENTAL SERVICES.
Email: N/A. Phone: 649-7114 / 898-9382.
Mailing Address: P.O. BOX 11427 YIGO, GUAM 96929
Physical address: LOT: 1110 - NEW - R2 NEW, MANGILAO.
RT. 10 MANGILAO NEXT TO STA SUBSTATION.

Description of Violation(s):

GEPA staff conducted an inspection of the premises described above and found the following violations:

1. Work consisting of one or more of the following was observed to be underway, or already completed, without a grading permit: grading, clearing, grubbing, embankment, filling, excavation, or other earth-moving activity.

The facts described above indicate a violation of 22 GAR §10103(A), "Permits Required": "(1) Unless exempted, no person shall commence or perform any grading, clearing, grubbing, embankment, filling, excavation or other earth-moving activity without a grading permit; (B) Unless exempted, no person shall commence or perform any stockpiling without a stockpiling permit."

Stop Work Order:

Under the authority of the Guam Soil Erosion and Sediment Control Regulations, 22 GAR §10110(C), Respondent is ordered to immediately cease all earth-moving and construction activities and comply with the following:

Within 7 calendar days:

- Apply for an after-the-fact permit to the Department of Public Works. Pursuant to 22 GAR §10108(F), two times the regular fees shall be assessed for work which has commenced or been accomplished without a permit.

This Stop Work Order does not prevent the Guam Environmental Protection Agency (GEPA) from issuing additional orders or taking additional enforcement action. Civil penalties of up to \$10,000 per violation, per day may be assessed as long as the violation continues. Pursuant to 22 GAR §10110(B), GEPA will transmit a copy of this Stop Work Order to the Department of Public Works (DPW). Both GEPA and DPW shall jointly enforce this Stop Work Order.

Inspector and Recipient Signature

Inspector
Name:

VERDNY. CHARFAUROS

Title: INSPECTOR II

Inspector
Signature:

Verdny Charfauros

Received
by:

NORMI SIDA MARIA

PRINT NAME AND SIGN

Date and
time of
inspection:

5.13.21 / 938 AM

Questions regarding this Stop Work Order should be referred to Guam EPA at 300-4751/52/53

GUAM EPA | 17-3304 Mariner Avenue Tiyan Barrigada, Guam 96913 1617 | Tel: (671) 300.4751/2 | Fax: (671) 300.4531 | epa.guam.gov
ALL LIVING THINGS OF THE EARTH ARE ONE - MANUNU TOPIU I MANLALALA



Like and follow guamepa



Primos Heavy Equipment Rental Services

COPY

P.O. Box 11427
Yigo, Guam 96929
Phone (671) 649-7114 / Fax (671) 649-7115
Cell (671) 898-9382

JOB ESTIMATE

January 12, 2021

To: James Ji Rental

Primos Heavy Equipment Rental Services is pleased to submit the following proposal for Clearing approximately 87,120 S.F. (2 acres) Property project located at Lot #1110-NEW-R2NEW, Mangilao, Guam:

Rates:

Hardfill Authorization Letter for Disposal: \$50.00 (Cash)

D-8: Mobilization \$600 (Round Trip)
Rental \$140 / Hour @ 8 hours minimum = \$1,120

Excavator: Mobilization \$400 (Round Trip)
Rental \$90 / Hour @ 8 hours minimum = \$ 720

Roller Compactor: Mobilization \$600 (Round Trip)
Rental \$100 / Hour @ 8 hours minimum = \$ 800

Quote for approximate work periods (Final amounts will be based on actual work time):

D-8 Mobilization \$ 600 (Round Trip)
Rental 3 Days Work \$3,360

Excavator Mobilization \$ 400 (Round Trip)
Rental 2 Days Work \$1,440

Note: - Includes Labor / Maintenance.

THIS ESTIMATE IS FOR COMPLETING THE JOB AS DESCRIBED ABOVE.
IT IS BASED ON OUR EVALUATION AND DOES NOT INCLUDE ADDITIONAL
EQUIPMENT AND LABOR WHICH MAY BE REQUIRED SHOULD UNFORESEEN
PROBLEMS OR ADVERSE WEATHER CONDITIONS ARISE AFTER THE WORK HAS STARTED.

ESTIMATED
JOB COST \$ 7,490.00

ESTIMATED
BY Felix Quan

Accepted by: 

Date: _____

Location: 1110-NEW-R2 NEW, Mangilao (Rt. 10 next to
GTA Substation)

Owner: JTI Pacific Dev. 477-9219 P.O.C: Linda Buena

Contractor: Primo's Heavy Equip. Rental Services 649-7114

Supervisor: Patrick Sajas 888-2620

BMP walls not properly installed around the project to dust from
affecting the neighboring houses. It can only be seen at the front
facing the main road. Date: May 17, 2021 Time: 12:24pm

Stop Work Order was issued to Primo's
on May 13, 2021 by Guam EPA
Inspector(s): Verony Charfarous and
Helen Gumatacao, WPC





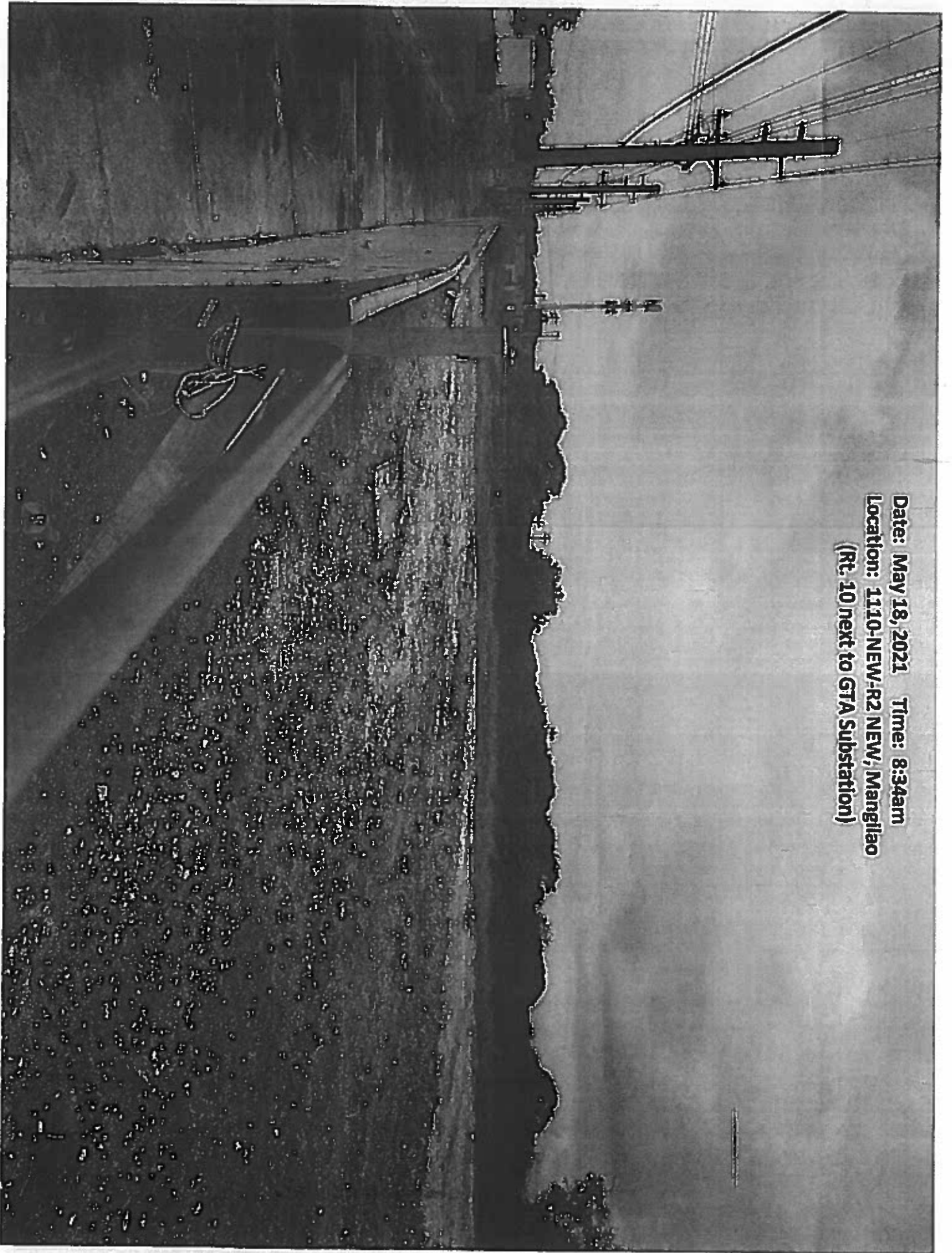
Localities: 1. 1000 ft. above sea level, 1000 ft. above sea level

2. 1000 ft. above sea level, 1000 ft. above sea level

3. 1000 ft. above sea level, 1000 ft. above sea level

4. 1000 ft. above sea level, 1000 ft. above sea level

Date: May 18, 2021 Time: 8:34am
Location: 1110-NEW-R2 NEW, Mangilao
(Rt. 10 next to GTA Substation)



Location: 1110-NEW-R2 NEW, Mangilao
(Rt. 10 next to GTA Substation)

Owner: JT Pacific Development

Contractor: Primo's Heavy Equip. Rental Service

Work still being done by contractor after Stop

Work Order was issued by GEPA Inspector(s) on

May 13, 2021.

Date: May 18, 2021

Time: 8:34am

