

STATE OF CALIFORNIA  
ENVIRONMENTAL PROTECTION AGENCY  
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:

South Coast Funding Group, Inc.  
dba Qwik Response Disaster Control  
and Construction  
165 Aero Camino  
Goleta, CA 93117

ID No. CAL000390241

Respondent.

Docket HWCA20187408

CONSENT ORDER

Health and Safety Code  
Section 25187

The State Department of Toxic Substances Control (Department) and South Coast Funding Group Inc. (Respondent) enter into this Consent Order and agree as follows:

1. Respondent transports hazardous waste under the dba Qwik Response Disaster Control and Construction, and maintains an office where Respondent parks its transport vehicles at 165 Aero Camino, Goleta, CA 93117 (Site).
2. The Department inspected the Site on October 10, 2017, and October 11, 2017.
3. The Department alleges the following violations:
  - 3.1. Respondent violated Health and Safety Code Section 25163(a)(2), and California Code of Regulations, Title 22, Section 66263.17(a), in that Respondent

transported hazardous waste without an active hazardous waste transporter registration between January 31, 2017 and October 11, 2017.

3.2. Respondent violated Health and Safety Code Section 25163(a)(2) in that Respondent transported hazardous waste without an active hazardous waste transporter registration to accompany the waste in the vehicles between January 31, 2017 and October 11, 2017.

4. Respondent does not dispute the alleged violations.

5. The parties wish to avoid the expense of litigation and to ensure prompt compliance.

6. Jurisdiction exists pursuant to Health and Safety Code section 25187.

7. Respondent waives any right to a hearing in this matter.

8. This Consent Order shall constitute full settlement of the violations alleged above, but does not limit the Department from taking appropriate enforcement action concerning other violations.

9. Respondent has come into compliance with respect to the aforementioned alleged violations.

#### PAYMENTS

10. Within 30 days of the effective date of this Consent Order, Respondent shall pay the Department a total of \$5000. Respondent's check shall be made payable to Department of Toxic Substances Control, and shall be delivered together with the attached Payment Voucher to:

Department of Toxic Substances Control  
Accounting Office  
1001 I Street, 21st floor  
P. O. Box 806

Sacramento, California 95812-0806

A photocopy of the check shall be sent:

To: Roberto Kou  
Branch Chief, Enforcement and Emergency Response Division  
Department of Toxic Substances Control  
9211 Oakdale Ave.  
Chatsworth, CA 91311

If Respondent fails to make payment as provided above, Respondent agrees to pay interest at the rate established pursuant to Health and Safety Code section 25360.1 and to pay all costs incurred by the Department in pursuing collection including attorney's fees.

#### OTHER PROVISIONS

11.1. Additional Enforcement Actions: By agreeing to this Consent Order, the Department does not waive the right to take further enforcement actions, except to the extent provided in this Consent Order.

11.2. Penalties for Noncompliance: Failure to comply with the terms of this Consent Order may subject Respondent to civil penalties and/or punitive damages for any costs incurred by the Department or other government agencies as a result of such failure, as provided by Health and Safety Code section 25188 and other applicable provisions of law.

11.3. Parties Bound: This Consent Order shall apply to and be binding upon Respondent and its officers, directors, agents, receivers, trustees, employees, contractors, consultants, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations, and upon

the Department and any successor agency that may have responsibility for and jurisdiction over the subject matter of this Consent Order.

11.4. Effective Date: The effective date of this Consent Order is the date it is signed by the Department.

11.5. Integration: This agreement constitutes the entire agreement between the parties and may not be amended, supplemented, or modified, except as provided in this agreement.

11.6. Authority to Bind: Each person executing this Consent Order represents that he or she has full and legal authority to execute this Consent Order for and on behalf of the respective party for which he or she is executing this agreement and to bind that party.

Dated: 2/15/18 \_\_\_\_\_  
Original Signed  
Respondent

Dated: 2/21/18 \_\_\_\_\_  
Original Signed  
Robert Kou  
Branch Chief  
Enforcement and Emergency Response Division  
Chatsworth Branch  
Department of Toxic Substances Control