



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Office of Compliance and Enforcement
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100
(503) 229-5696
FAX (503) 229-5100
TTY 711

January 6, 2026

CERTIFIED MAIL: 9589 0710 5270 3236 6722 84

Northwest Real Estate Capital Corporation
c/o Jamie Witham, Registered Agent
Garden Grove Apartments
2727 22nd Ave Suite B
Forest Grove, Oregon 97116

Re: Notice of Civil Penalty Assessment and Order
Case No. AQ/AB-WR-2024-562

This letter is to inform you that the Oregon Department of Environmental Quality (DEQ) has issued Northwest Real Estate Capital Corporation a civil penalty of \$27,785 for allowing a person not licensed by DEQ to perform an asbestos abatement project, for failing to obtain an asbestos survey by an accredited inspector prior to an asbestos abatement project, and for openly accumulating asbestos-containing waste material by allowing the contractor to leave the material unsecured on your property at 1660 Newmark Avenue in Coos Bay, Oregon.

DEQ issued this penalty because the violations described in the attached Notice could have released asbestos fibers into the air and exposed workers, the residents, and the public to asbestos. Asbestos fibers are a respiratory hazard proven to cause lung cancer, mesothelioma, and asbestosis. Asbestos is a danger to public health and a hazardous air contaminant for which there is no known safe level of exposure. To protect the public from asbestos exposure, DEQ requires training and licensing for those who handle asbestos-containing material and prohibits open accumulation of asbestos-containing waste material, as open accumulation of asbestos-containing waste material presents a significant risk to public health and the environment.

If you wish to appeal this matter, DEQ must receive a request for a hearing within 20 calendar days from your receipt of this letter. The hearing request must be in writing. Send your request to DEQ Office of Compliance and Enforcement:

Via mail – 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232

Via email – DEQappeals@deq.state.or.us

Via fax – 503-229-5100

Once DEQ receives your request, we will arrange to meet with you to discuss this matter. If DEQ does not receive a timely written hearing request, the penalty will become due. Alternatively, you can pay the penalty by sending a check or money order to the above address.

The attached Notice further details DEQ's reasons for issuing the penalty and provides further instructions for appealing the penalty. Please review and refer to it when discussing this case with DEQ.

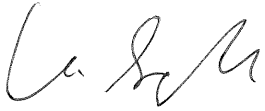
DEQ may allow you to resolve part of your penalty through the completion of a Supplemental Environmental Project (SEP). SEPs are environmental improvement projects that you sponsor instead of

paying a penalty. Further information is available by calling the number below or at <http://www.oregon.gov/deq/Regulations/Pages/SEP.aspx>.

DEQ's rules are available at <http://www.oregon.gov/deq/Regulations/Pages/Statutes.aspx> or by calling the number below.

If you have any questions, please contact DEQ Environmental Law Specialist Tori Heroux at 971-808-7046 or at Tori.Heroux@deq.oregon.gov.

Sincerely,



Erin Saylor, Interim Manager
Office of Compliance and Enforcement

Enclosures

cc: Martin Abts, DEQ – Coos Bay
Zach Loboy, DEQ
Accounting, DEQ

1 BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
2 OF THE STATE OF OREGON

3 IN THE MATTER OF:) NOTICE OF CIVIL PENALTY
4 NORTHWEST REAL ESTATE) ASSESSMENT AND ORDER
5 CAPITAL CORPORATION)
6 Respondent.) CASE NO. AQ/AB-WR-2024-562

7 I. AUTHORITY

8 The Department of Environmental Quality (DEQ) issues this Notice of Civil Penalty Assessment
9 and Order (Notice) pursuant to Oregon Revised Statutes (ORS) 468.100, ORS 468.126 through 468.140,
10 ORS Chapter 183 and 468A, Oregon Administrative Rules (OAR) Chapter 340, Divisions 011, 012, and
11 248.

12 II. FINDINGS OF FACT

13 1. Respondent owns an apartment building called the Lake Empire Apartments located at 1660
14 Newmark Avenue in Coos Bay, Oregon.

15 2. Respondent hired Reid Flooring, LLC dba Modern Floors Floor Covering Co. (“the
16 Contractor”) on or before February 4, 2024, to conduct a renovation of Apartment #13 at the Lake
17 Empire Apartments (“the Apartment”).

18 3. The Contractor hired a subcontractor, No Bull Jon, LLC (“the Subcontractor”) to remove
19 the flooring and install new flooring.

20 4. On June 13, 2007, Respondent received a Phase I Environmental Site Assessment Report
21 from Terracon Consulting that included information regarding limited asbestos sampling. Specifically,
22 the report documented that vinyl sheet flooring in multiple apartments was found to contain >1%
23 chrysotile asbestos by weight, and that “the paper backing on the sheet vinyl flooring would render this
24 material friable during renovation or demolition.”

25 5. Neither the Contractor nor the Subcontractor is an asbestos abatement contractor licensed by
26 DEQ.

27 6. On February 5, 2024, the Subcontractor entered the Apartment and started renovation work.

28 \\\

1 7. Neither Respondent, the Contractor, nor the Subcontractor submitted a written notification
2 to DEQ prior to beginning the removal of the vinyl flooring on February 5, 2024.

3 8. Neither the Respondent, the Contractor, nor the Subcontractor, had an accredited inspector
4 complete an asbestos survey prior to beginning the removal of the vinyl flooring on February 5, 2024.

5 9. On February 5, 2024, the Subcontractor's employees tore up 127.5 square feet of the first
6 layer of vinyl flooring and 42.5 square feet of the second layer of the vinyl flooring from the kitchen
7 and dining room in the Apartment with a miniature circular saw in a manner that included breaking it
8 into small, fragmented pieces, rendering the material friable.

9 10. The Subcontractor's handling of materials as described in Section II, Paragraph 9, above,
10 had the potential to release asbestos fibers into the air.

11 11. The residents of the Apartment, a mother with four young children, was present in the home
12 at the time the work on the vinyl floor was conducted.

13 12. On February 6, 2024, a real estate inspection company hired by Respondent called FasTrak
14 LLC conducted an asbestos survey at the Apartment. FasTrak LLC was not an accredited asbestos
15 inspector because their accreditation was expired. The survey stated that asbestos was found in all three
16 layers of vinyl flooring in the kitchen (30%).

17 13. On February 26, 2024, DEQ collected samples of the vinyl flooring materials at the
18 Apartment. Based on those samples, the second layer of vinyl flooring contained 48% chrysotile
19 asbestos. The first layer had trace amounts of chrysotile asbestos and the third had 6% chrysotile
20 asbestos content, attributed to contamination from the second layer.

21 14. On February 26, 2024, a DEQ inspector observed small pieces of sheet vinyl flooring
22 scattered across the kitchen and living room floor of the Apartment.

23 15. On March 4, Respondent hired a contractor, HazMat One, to determine the level of asbestos
24 contamination in the Apartment. Hazmat One conducted wipe sampling and reported finding 144
25 chrysotile fibers in the sample of the kitchen counter, more than three times more asbestos fibers than is
26 typical when wipe sampling in his experience. The living room tabletop sample contained 38 chrysotile
27 fibers.

1 16. On March 13, 2024, Respondent hired LOI Environmental and Demolition Services, an
2 accredited asbestos abatement contractor, to complete the abatement of asbestos containing material in
3 the Apartment. The abatement was completed on May 2, 2024.

4 III. CONCLUSIONS

5 1. Respondent violated OAR 340-2480-0110(3) by allowing a person not licensed by DEQ as an
6 asbestos contractor to conduct an asbestos abatement project. Specifically, Respondent allowed the
7 Subcontractor to remove 42.5 square feet of vinyl flooring in a manner that released asbestos fibers into
8 the air. The kitchen flooring was “asbestos-containing material” as defined by OAR 340-248-0010(8)
9 because it contained more than 1% asbestos by weight. The Subcontractor’s work on the Apartment was
10 an “asbestos abatement project,” as defined in OAR 340-248-0010(6) because it was a renovation activity
11 that involved the removal and handling of asbestos-containing materials with the potential to release
12 asbestos fibers into the air. This is a Class I violation according to OAR 340-012-0054(1)(v). DEQ has
13 assessed an \$6,185 civil penalty for this violation.

14 2. Respondent violated OAR 340-248-0205(1) by openly accumulating asbestos containing waste
15 material (ACWM). Specifically, Respondent allowed ACWM to be left uncovered, unwetted and
16 unbagged scattered across the kitchen and living room floors of the Apartment. The second layer of vinyl
17 flooring was “asbestos-containing material” as defined by OAR 340-248-0010(8) because it contained
18 more than 1% asbestos by weight. Respondent’s work on the Apartment was an “asbestos abatement
19 project,” as defined in OAR 340-248-0010(6) because it was a renovation activity that involved the
20 removal and handling of asbestos-containing materials with the potential to release asbestos fibers into the
21 air. The ACWM scattered on the floor was not packaged or labeled, thus constituting “open accumulation”
22 as defined in OAR 340-248-0010(34). This is a Class I violation according to OAR 340-012-0054(1)(s).
23 DEQ has assessed an \$7,200 civil penalty for this violation.

24 3. Respondent violated OAR 340-248-0270(1) by failing to have an accredited inspector
25 complete an asbestos survey according to OAR 340-248-0270(3) before performing a renovation, as
26 described in Section II, Paragraph 8 above. The removal of the vinyl flooring is a “renovation” as defined
27 in OAR 340-248-0010(39) because Respondent authorized the removal of one or more facility

1 components by hiring a contractor to remove vinyl flooring from the floor of the Apartment. This is a
2 Class I violation according to OAR 340-012-0054(1)(r). DEQ has assessed a \$14,400 civil penalty for this
3 violation.

4 IV. ORDER TO PAY CIVIL PENALTY

5 Based upon the foregoing FINDINGS OF FACTS AND CONCLUSIONS, Respondent is
6 hereby ORDERED TO:

7 Pay a total civil penalty of \$27,785. The determinations of the civil penalties are attached as
8 Exhibits 1, 2 and 3 and are incorporated as part of this Notice.

9 If you do not file a request for hearing as set forth in Section V below, please pay the penalty as
10 follows:

11 Pay online with e-check (ACH) or credit card. Go to Your DEQ Online here:
12 <https://ydo.oregon.gov>. Select Register Account or Login, then select Pay Invoices/Fees on your account
13 dashboard. Enter the reference number and Account ID included on the attached payment slip. Note: US
14 Bank charges a 2.3% convenience charge for credit card transactions. ACH payments have no additional
15 charges, or

16 Pay by check or money order: Make check payable to “Department of Environmental Quality”
17 and mail to the address on the enclosed payment slip. Please make sure to include the payment slip with
18 your check or money order and note the case number on your check.

19 V. NOTICE OF RIGHT TO REQUEST A CONTESTED CASE HEARING

20 You have a right to a contested case hearing on this Notice if you request one in writing. DEQ
21 must receive your request for hearing **within 20 calendar days** from the date you receive this Notice. If
22 you have any affirmative defenses or wish to dispute any allegations of fact in this Notice or attached
23 exhibits, you must do so in your request for hearing, as factual matters not denied will be considered
24 admitted, and failure to raise a defense will be a waiver of the defense. (See OAR 340-011-0530 for
25 further information about requests for hearing.) You must send your request to: **DEQ, Office of**
26 **Compliance and Enforcement, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232**, fax
27 it to **503-229-6762** or email it to DEQappeals@deq.oregon.gov. An administrative law judge

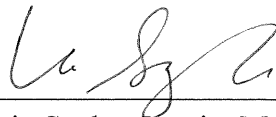
1 employed by the Office of Administrative Hearings will conduct the hearing, according to ORS
2 Chapter 183, OAR Chapter 340, Division 011 and OAR 137-003-0501 to 0700. You have a right to be
3 represented by an attorney at the hearing, however you are not required to be. If you are an individual,
4 you may represent yourself. If you are a corporation, partnership, limited liability company,
5 unincorporated association, trust or government body, you must be represented by an attorney or a duly
6 authorized representative, as set forth in OAR 137-003-0555.

7 Active-duty Service members have a right to stay proceedings under the federal Service
8 Members Civil Relief Act. For more information contact the Oregon State Bar at 1-800-452-8260, the
9 Oregon Military Department at 503-584-3571, or the nearest United States Armed Forces Legal
10 Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military Department does not
11 have a toll-free telephone number.

12 If you fail to file a timely request for hearing, the Notice will become a final order by default
13 without further action by DEQ, as per OAR 340-011-0535(1). If you do request a hearing but later
14 withdraw your request, fail to attend the hearing or notify DEQ that you will not be attending the
15 hearing, DEQ will issue a final order by default pursuant to OAR 340-011-0535(3). DEQ designates
16 the relevant portions of its files, including information submitted by you, as the record for purposes of
17 proving a prima facie case.

18
19
20
21 1/6/2026

22 Date

23 

24 Erin Saylor, Interim Manager
25 Office of Compliance and Enforcement
26
27

EXHIBIT 1

FINDINGS AND DETERMINATION OF RESPONDENT'S CIVIL PENALTY PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

- VIOLATION NO. 1 Allowing a contractor to perform an asbestos abatement project without being licensed by DEQ in violation of OAR 340-248-0110(3).
- CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0054(1)(t).
- MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0135(1)(i)(C) and (D) because although less than 80 square feet of asbestos-containing material was removed, the material was more than five percent asbestos by weight. The contractor hired by Respondent removed and handled approximately 42.5 square feet of asbestos-containing material which was 48 percent chrysotile asbestos by weight.
- CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is: $BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB$
- "BP" is the base penalty, which is \$4,000 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-012-0140(3)(b)(A)(ii) and applicable pursuant to OAR 340-012-0140(3)(a)(B) because Respondent is not a residential owner-occupant.
- "P" is whether Respondent has any prior significant actions, as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 because Respondent has no prior significant actions.
- "H" is Respondent's history of correcting prior significant actions, and receives a value of 0 according to OAR 340-012-0145(3)(c) because there were no prior significant actions.
- "O" is whether the violation was repeated or ongoing, and receives a value of 0 according to OAR 340-012-0145(4)(a) because there was one occurrence of the violation. Each day of violation constitutes a separate occurrence. The Respondent allowed an asbestos abatement project to be conducted by an unlicensed person on February 4, 2024.
- "M" is the mental state of the Respondent, and receives a value of 8 according to OAR 340-012-0145(5)(c) because Respondent was reckless. According to OAR 340-012-0030(20), "reckless" means the respondent consciously disregarded a substantial and unjustifiable risk that the result would occur or that the circumstance existed. The risk must be of such a nature and degree that disregarding that risk constituted a gross deviation from the standard of care a reasonable person would observe in that situation. Respondent was in receipt of an Environmental Site Assessment documenting that the vinyl sheet flooring in the apartments

sampled contained >1% chrysotile asbestos by weight. This awareness that asbestos containing materials were present in the vinyl sheet flooring in the apartments indicates that Respondent acted recklessly in failing to hire a licensed asbestos contractor to remove the flooring.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of -3 according to OAR 340-012-0145(6)(c) because Respondent took reasonable efforts to correct the violation in hiring a certified asbestos contractor to abate the asbestos containing material.

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent's noncompliance. It is designed to "level the playing field" by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, "EB" receives a value of \$185 for the delayed costs of hiring a certified asbestos abatement contractor to clean up between February 4, 2024, and May 2, 2024.

PENALTY CALCULATION: $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$

$$\begin{aligned} &= \$4,000 + [(0.1 \times \$4,000) \times (0 + 0 + 0 + 8 + -3)] + \$185 \\ &= \$4,000 + (\$400 \times 5) + \$185 \\ &= \$4,000 + \$2,000 + \$185 \\ &= \$6,185 \end{aligned}$$

EXHIBIT 2

FINDINGS AND DETERMINATION OF RESPONDENT'S CIVIL PENALTY
PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

VIOLATION NO. 2 Violating OAR 340-248-0205(1) by openly accumulating friable asbestos containing waste material.

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0054(1)(s).

MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0135(1)(i)(B) and (D) because although the violation involved less than 80 square feet of asbestos-containing material or asbestos-containing waste material, the material was more than five percent asbestos by weight. The contractor hired by Respondent removed and handled approximately 42.5 square feet of asbestos-containing material which was 48 percent chrysotile asbestos by weight.

CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is: $BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB$

"BP" is the base penalty, which is \$4,000 for a Class I, major magnitude violation in the matrix listed in OAR 340-012-0140(3)(b)(A)(iii) and applicable pursuant to OAR 340-012-0140(3)(a)(B) because Respondent is not a residential owner-occupant.

"P" is whether Respondent has any prior significant actions, as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 because Respondent has no prior significant actions.

"H" is Respondent's history of correcting prior significant actions, and receives a value of 0 according to OAR 340-012-0145(3)(c) because there were no prior significant actions.

"O" is whether the violation was repeated or ongoing, and receives a value of 4 according to OAR 340-012-0145(4)(d) because there were more than 28 occurrences of the violation. Each day of violation constitutes a separate occurrence. Respondent openly accumulated asbestos containing waste material for more than 28 days, from February 4 to May 2, 2024.

"M" is the mental state of the Respondent, and receives a value of 4 according to OAR 340-012-0145(5)(c) because Respondent was negligent. According to OAR 340-012-0030(15), "negligent" means the respondent failed to take reasonable care to avoid a foreseeable risk of conduct constituting or resulting in a violation. Respondent had been aware since at least 2007 that the flooring in multiple units of the apartment complex contained asbestos. By failing to ensure that the flooring in the Apartment was properly removed and contained, Respondent failed to take reasonable care to avoid the foreseeable risk that a violation would occur.

"C" is Respondent's efforts to correct or mitigate the violation and receives a value of 0 according to OAR 340-012-0145(6)(f) because the violation or the effects of the violation could not be corrected or minimized.

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent's noncompliance. It is designed to "level the playing field" by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, "EB" receives a value of \$0 because Respondent did not gain an economic benefit as a result of the violation because Respondent eventually hired an accredited asbestos contractor to properly dispose of the asbestos-containing materials.

PENALTY CALCULATION: $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$

$$\begin{aligned} &= \$4,000 + [(0.1 \times \$4,000) \times (0 + 0 + 4 + 4 + 0)] + \$0 \\ &= \$4,000 + (\$400 \times 8) + \$0 \\ &= \$4,000 + \$3,200 + \$0 \\ &= \$7,200 \end{aligned}$$

EXHIBIT 3

FINDINGS AND DETERMINATION OF RESPONDENT'S CIVIL PENALTY
PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

- VIOLATION NO. 3 Violating OAR 340-248-0270(1) by failing to have an accredited inspector complete an asbestos survey according to OAR 340-248-0270(3) prior to performing a renovation.
- CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0054(1)(t).
- MAGNITUDE: The magnitude of the violation is major pursuant to OAR 340-012-0135(1)(i)(B) and (D) because although more than 80 but less than 160 square feet of asbestos-containing material was removed, the material was more than five percent asbestos by weight. The project involved at least 127.5 feet of vinyl flooring, and at least some of that material was 48 percent chrysotile asbestos by weight.
- CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is: $BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB$
- "BP" is the base penalty, which is \$8,000 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-012-0140(3)(b)(A)(i) and applicable pursuant to OAR 340-012-0140(3)(a)(B) because Respondent is not a residential owner-occupant.
- "P" is whether Respondent has any prior significant actions, as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 because Respondent has no prior significant actions.
- "H" is Respondent's history of correcting prior significant actions, and receives a value of 0 according to OAR 340-012-0145(3)(c) because there were no prior significant actions.
- "O" is whether the violation was repeated or ongoing, and receives a value of 0 according to OAR 340-012-0145(4)(a) because there was one occurrence of the violation. Each day of violation constitutes a separate occurrence. The Respondent allowed the Subcontractor to conduct an asbestos abatement project without an accredited inspector completing an asbestos survey on February 4, 2024.
- "M" is the mental state of the Respondent, and receives a value of 8 according to OAR 340-012-0145(5)(c) because Respondent was reckless. According to OAR 340-012-0030(20), "reckless" means the respondent consciously disregarded a substantial and unjustifiable risk that the result would occur or that the circumstance existed. The risk must be of such a nature and degree that disregarding that risk constituted a gross deviation from the standard of care a reasonable person would observe in that situation. Respondent was in receipt of an Environmental Site Assessment documenting that the vinyl sheet flooring in the apartments

sampled contained >1% chrysotile asbestos by weight. This awareness that asbestos containing materials were present in the vinyl sheet flooring in the apartments indicates that Respondent acted recklessly.

"C" is Respondent's efforts to correct or mitigate the violation, and receives a value of 0 according to OAR 340-012-0145(6)(f) because the violation or the effects of the violation could not be corrected or minimized.

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent's noncompliance. It is designed to "level the playing field" by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, "EB" receives a value of \$0 because DEQ does not have sufficient information to calculate the economic benefit.

PENALTY CALCULATION: $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$
= \$8,000 + [(0.1 x \$8,000) x (0 + 0 + 0 + 8 + 0)] + \$0
= \$8,000 + (\$800 x 8) + \$0
= \$8,000 + \$6,400 + \$0
= \$14,400

Oregon Department of Environmental Quality
 700 NE Multnomah Street, Suite 600
 Portland, OR 97232-4100



State of Oregon
 Department of Environmental Quality

Phone: 503-229-5437
 Fax: 503-229-5850

CIVIL PENALTY - ORS 468.135(2)

NORTHWEST REAL ESTATE CAPITAL CORPORATION
 201 W MALLARD DR
 BOISE, ID 83706

DATE:	January 6, 2026
RESPONSE DATE*:	March 17, 2026
TOTAL PENALTY:	\$27,785.00

Account Name:	NORTHWEST REAL ESTATE CAPITAL CORPORATION		
Account Type:	Vendor/Organization/Company	Reference Number:	CPGFD2600059
SubSystem ID:	1174	FIMS Acct. ID:	29779

Penalty Summary

Penalty Amount	Interest	Adjustment	Amount Paid	Total Penalty
\$ 27,785.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 27,785.00

*This is the date the penalty is due if you do not exercise your right to appeal the attached order. Payment of this penalty is subject to the exercise of your options or right to appeal as described in the enclosed enforcement documents.

To Pay Online with ACH or Credit Card Visit <https://ydo.oregon.gov> and select 'Register Account'

----- ✂
 PLEASE RETURN THIS PORTION WITH YOUR PAYMENT



REFERENCE NO.	CPGFD2600059		
PAYCODE:	00401 7400 10040 74001 0500 000000 00		
FEE PROGRAM ID:	950	RESPONSE DATE:	March 17, 2026
FIMS ACCT. ID:	29779	TOTAL PENALTY DUE:	\$27785.00

NORTHWEST REAL ESTATE CAPITAL CORPORATION
 201 W MALLARD DR
 BOISE, ID 83706

AMOUNT ENCLOSED:

MAKE CHECK PAYABLE TO: Department of Environmental Quality

DEQ FINANCIAL SERVICES - LBX4244
 PO BOX 4244
 PORTLAND OR 97208-4244

Check this box if updated address information has been provided on the back of the form.

00401 7400 10040 74001 0500 000000 0095000297795CPGFD260005900027785007



State of Oregon
Department of
Environmental
Quality

State of Oregon Department of Environmental Quality

CIVIL PENALTY - ORS 468.135(2)

700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100
Phone: 503-229-5437
Fax: 503-229-5850

Penalty Detail

Transaction Date	Description	Amount
1/5/2026	2024-562 AQ-AB-WR-2024-562	\$27,785.00

SFMS Agencies Use:

Trans Code	Treasury Fund	SFMS	Index	PCA (5)	Agency Object	Project #	Phase
723	00401	7400	10040	74001	0500	00000	00

Address Changes

Please visit <https://ydo.oregon.gov> to update your mailing address online or provide the following information:

Name _____
 Address _____
 City, State, Zip _____

CERTIFICATE OF MAILING

I hereby certify that I served DEQ Case No. AQ/AB-WR-2024-562 upon:

9589 0710 5270 3236 6722 84

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT <i>Domestic Mail Only</i>	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Certified Mail Fee \$ _____	Postmark Here
Extra Services & Fees (<i>check box, add fee as appropriate</i>)	
<input type="checkbox"/> Return Receipt (hardcopy) \$ _____	
<input type="checkbox"/> Return Receipt (electronic) \$ _____	
<input type="checkbox"/> Certified Mail Restricted Delivery \$ _____	
<input type="checkbox"/> Adult Signature Required \$ _____	
<input type="checkbox"/> Adult Signature Restricted Delivery \$ _____	
Northwest Real Estate Capital Corporation c/o Jamie Witham, Registered Agent Garden Grove Apartments 2727 22nd Ave Suite B Forest Grove, OR 97116	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

By mailing a true copy of the above by placing it in a sealed envelope, with postage prepaid at the DEQ/DAS mail services in Portland, Oregon on January 6, 2026

Isaac Griffith

Isaac Griffith, Case Coordinator

Office of Compliance & Enforcement

Department of Environmental Quality