



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

June 25, 2026

CERTIFIED MAIL: 9589 0710 5270 0110 5987 77

FourThreeSeven Management, LLC
dba Bobsled Extracts
c/o Sussman Shank Registration Services, LLC, Registered Agent
1000 SW Broadway Street 1400
Portland, Oregon 97222

Re: Notice of Civil Penalty Assessment and Order
Case No. AQ/ACDP-NWR-2025-626

This letter is to inform you that the Oregon Department of Environmental Quality (DEQ) has issued you a civil penalty of \$46,631 for operating a cannabis extracts manufacturing business at 1952 SE Ochoco Street in Milwaukie without an air quality permit and for violating hazardous waste regulations.

DEQ issued this penalty because your unpermitted cannabis processing operations created risk to the environment and human health. Your operations have the capacity to emit volatile organic compounds (VOCs) above the threshold by which an air quality permit is required. VOCs are a precursor to ground-level ozone pollution, which is harmful to public health. In addition, you failed to complete a hazardous waste determination and treated hazardous waste without the required treatment permit, which led to numerous fires and at least one explosive reaction.

\$28,431 of the civil penalty represents the economic benefit you gained by avoiding paying air permit fees since you began operation in July 2021, failing to complete a hazardous waste determination, and failing to properly treat your hazardous waste. DEQ appreciates your efforts to correct the violations by submitting an application for an air quality permit and by submitting requested hazardous waste information to DEQ. DEQ considered these efforts when determining the amount of civil penalty.

You may pay the civil penalty as follows:

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

Pay by check or money order: Make checks payable to "Department of Environmental Quality" and mail to the address on the enclosed payment slip. Please make sure to include the payment slip with your check or money order.

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.oregon.gov

Via fax – 503-229-6762

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.

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 portion of your 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 <https://www.oregon.gov/deq/Regulations/Pages/Administrative-Rules.aspx> or by calling the number below.

If you have any questions, please contact Zoe Morton at (971) 481-5860 or zoe.morton@deq.oregon.gov, or Becka Puskas at (503) 979-5421 or becka.puskas@deq.oregon.gov.

Sincerely,



Erin Saylor, Manager
Office of Compliance and Enforcement

Enclosures

cc: Steven Sweeny, FourThreeSeven Management, LLC, 1952 SE Ochoco St, Milwaukie, OR 97222-7315
Andrea Meyer, Sussman Shank LLP, 1000 Southwest Broadway, Suite 1400, Portland, OR 97205
Stephen Wozab, DEQ
Brian Hall, DEQ
Accounting, DEQ
Donald Hendrix, AQ, DEQ
Michelle Olson, DEQ

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

IN THE MATTER OF:) NOTICE OF CIVIL PENALTY
FOURTHREESEVEN MANAGEMENT,) ASSESSMENT AND ORDER
Respondent.) CASE NO. AQ/ACDP-NWR-2025-626

I. AUTHORITY

The Department of Environmental Quality (DEQ) issues this Notice of Civil Penalty Assessment and Order (Notice) pursuant to Oregon Revised Statutes (ORS) 468.100, ORS 468.126 through 468.140, ORS 466.990, ORS Chapters 468A and 183, and Oregon Administrative Rules (OAR) Chapter 340, Divisions 011, 012, 100-102, 216, and 245.

II. FINDINGS OF FACT

1. At all relevant times, Respondent has operated a cannabis extracts business at 1952 SE Ochoco Street, Milwaukie, Oregon 97222 (the Facility).

Air Quality Violations

2. On or about July 1, 2021, Respondent began manufacturing at the Facility.

3. Respondent's manufacturing process includes using solvents to extract cannabis concentrates, and these solvents emit volatile organic compounds (VOCs).

4. The Facility has a capacity to emit 10 or more tons per year of VOCs.

5. On August 4, 2025, Respondent submitted an Air Contaminant Discharge Permit (ACDP) application to DEQ.

6. As of the date of this Notice, DEQ has not issued an ACDP for the Facility.

Hazardous Waste Violations

7. On March 28, 2024, DEQ staff inspected the Facility.

8. At that time, Respondent had not made a hazardous waste determination on stockpiled biomass or new biomass.

9. Respondent utilizes hydrocarbon extraction equipment within a "C1D1" enclosure to

1 produce cannabis products. This product utilizes butane to extract oils from the cannabis.

2 10. Since February 13, 2024, Respondent generated over 220 pounds of waste cannabis
3 biomass containing solvents and Trichloroisocyanuric acid and did not make or document a complete
4 and accurate hazardous waste determination at the point of generation.

5 11. Respondent placed waste biomass in an open container in the C1D1 booth under a large
6 fan to evaporate the remaining solvents from the waste biomass post-extraction, in order to change the
7 physical, chemical, or biological character or composition of the waste and render the waste non-
8 hazardous, safer to transport, store, or dispose of, or reduced in volume.

9 12. Respondent stored the hazardous waste outdoors in garbage bags, some of which had
10 been torn and were open to the elements.

11 13. At no time did Respondent have a permit issued by DEQ to store, treat, or dispose of
12 hazardous waste at the Facility.

13 14. Respondent's waste stream has a history of contributing to the start of multiple fires and
14 at least one explosive reaction.

15 III. CONCLUSIONS

16 Air Quality Violations

17 1. Respondent violated ORS 478A.045(1)(b) and OAR 340-216-0020(3) by operating a source
18 required to have an ACDP without first obtaining a permit from DEQ, as described in Paragraphs 2-5
19 of Section II above. Specifically, on or about July 1, 2021, Respondent began manufacturing cannabis
20 extracts at the Facility. The Facility has a capacity¹ to produce 10 or more tons per year of VOCs,
21 making the Facility a source listed in OAR 340-216-8010, Table 1, Part B, Category 85², and triggering
22 the requirement in OAR 340-216-0020(2) to obtain an ACDP from DEQ. DEQ notified the Respondent
23 that they needed an ACDP permit on July 30, 2025. Respondent submitted an ACDP application on
24 August 4, 2025. As of the date of this Notice, DEQ has not issued Respondent an ACDP for the

25 ¹ Capacity is defined in OAR 340-200-0020(20) as "the maximum regulated pollutant emissions from a stationary source
26 under its physical and operational design."

27 ² OAR 340-216-8010, Table 1, Part B, Category 85 applies to "All other sources, both stationary and portable, not listed
herein which would have capacity of 5 or more tons per year of direct PM2.5 or PM10 if located in a PM2.5 or PM10
nonattainment or maintenance area, or 10 or more tons per year of any single criteria pollutant." VOCs are included in the
definition of "criteria pollutant" in OAR 340-200-0020(36).

Facility. This is a Class I violation according to OAR 340-012-0054(1)(b). DEQ hereby assesses a \$25,870 civil penalty for this violation.

Hazardous Waste Violations

2. Respondent violated 40 CFR 262.11 and OAR 340-102-0011(2) by failing to accurately determine if Respondent's residues (as defined in OAR 340-100-0010(2)(hh) and 40 CFR 261.2) were hazardous waste, as described in Paragraphs 9-10 of Section II above. At the time of the violation, Respondent was a small quantity generator of hazardous waste, pursuant to 40 CFR 260.10. At the time of the inspection, Respondent was generating 220 to 2,200 pounds of hazardous waste in a calendar month. The wastes described in Paragraphs 11-12 are hazardous wastes identified by Waste Numbers D001 and D003, pursuant to 40 CFR 261.21(a)(2), 40 CFR 261.21(a)(4), and 40 CFR 261.23(a)(6). This is a Class I violation, according to OAR 340-012-0135(4)(a)(C). DEQ hereby assesses a \$5,453 civil penalty for these violations.

3. Respondent violated ORS 466.095(1)(c) by treating hazardous waste at the Facility without a permit, as defined in 40 CFR 260.10 and as described in Paragraphs 11-14 of Section II above. Specifically, Respondent evaporated approximately 1,000-2,000 pounds of hazardous waste identified by Waste Numbers D001, pursuant to 40 CFR 261.21(a)(2) and 40 CFR 261.21(a)(4), as described in Paragraph 11 of Section II above. This is a Class I violation, according to OAR 340-012-0068(1)(h). DEQ hereby assesses a \$15,308 civil penalty for this violation.

4. Respondent violated 40 CFR 262.16(b)(2)(ii)(B) by opening, handling, or storing hazardous waste containers in a manner that may cause ruptures or leaks, as described in Paragraph 12 of Section II above. The wastes described in Paragraph 11-12 of Section II, were hazardous wastes identified with EPA Hazardous Waste Numbers D001 and D003, pursuant to 40 CFR 261.21(a)(2), 40 CFR 261.21(a)(4), and 40 CFR 261.23(a)(6). This is a Class II violation, according to OAR 340-012-0068(2)(m). DEQ has not assessed a civil penalty for this violation.

5. Respondent violated OAR 340-102-0018 by failing to obtain a RCRA Generator EPA ID prior to generating over 220 pounds of hazardous waste. The wastes described in Paragraph 11-12 were hazardous wastes identified with EPA Hazardous Waste Numbers D001 and D003, pursuant to 40 CFR

261.21(a)(2), 40 CFR 261.21(a)(4), and 40 CFR 261.23(a)(6). This is a Class II violation, according to OAR 340-012-0068(2)(q). DEQ has not assessed a civil penalty for this violation.

IV. ORDER TO PAY CIVIL PENALTY

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

1. Pay a total civil penalty of \$46,631. The determination of the civil penalties are attached as Exhibits 1-3 and are incorporated as part of this Notice.

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

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

Pay by check or money order: Make checks payable to "Department of Environmental Quality" and mail to the address on the enclosed payment slip. Please make sure to include the payment slip with your check or money order.

V. NOTICE OF RIGHT TO REQUEST A CONTESTED CASE HEARING

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

Chapter 183, OAR Chapter 340, Division 011 and OAR 137-003-0501 to 0700. You have a right to be represented by an attorney at the hearing, however you are not required to be. If you request a hearing, you will be notified of the time and place of the hearing and you will be given information on the procedures, and other rights of parties relating to the conduct of the hearing before commencement of the hearing. If you are an individual, you may represent yourself. If you are a corporation, partnership, limited liability company, unincorporated association, trust or government body, you must be represented by an attorney or a duly authorized representative, as set forth in OAR 137-003-0555.

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

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

Date

6/25/2020

Erin Saylor, Manager
Office of Compliance and Enforcement

EXHIBIT 1

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

VIOLATION NO. 1 Operating a source required to have an ACDP without first obtaining an ACDP in violation of ORS 468A.045(1)(b) and OAR 340-216-0020(3).

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0054(1)(b) because Respondent constructed a new source, as defined in OAR 340-245-0020, without first obtaining an ACDP that includes permit conditions required under OAR 340-245-0005 through 340-245-8050 or without complying with Cleaner Air Oregon rules under OAR 340-245-0005 through 340-245-8050. The Facility is a new source as defined in OAR 340-245-0020(33)(a) because it is not an existing source. The Facility is not an existing source according to OAR 340-245-0020(20) because Respondent did not begin construction or obtain any Clean Air Act approvals, nor did Respondent submit any applications to DEQ for the Facility before November 16, 2018, the effective date of the Cleaner Air Oregon program.

MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0130(1), as there is no selected magnitude specified in OAR 340-012-0135 applicable to this violation, and the information reasonably available to DEQ does not indicate a minor or major magnitude.

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)(A) because Respondent should have an ACDP to operate at the Facility.

"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 according to OAR 340-012-0145(2)(a)(A), because there are 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 is no prior history.

"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 is a separate occurrence of the violation. On or about July 1, 2021, Respondent began operating at the Facility. As of the date of this Notice, DEQ has not issued Respondent an ACDP for the Facility. Therefore, the violation has been occurring from July 1, 2021, to the date of this Notice, and there are more than 28 occurrences of the violation represented in this penalty.

- "M" is the mental state of the Respondent, and receives a value of 2 according to OAR 340-012-0145(5)(b) because Respondent had constructive knowledge (reasonably should have known) of the requirement. As a business owner starting up a new manufacturing operation, Respondent should have reviewed regulatory requirements that apply to its operations, including air permitting requirements. Thus, Respondent should have estimated its VOC emissions, and reasonably should have known that an ACDP was required for the Facility.
- "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 made reasonable efforts to correct the violation. Following an inspection by DEQ in April 2024, Respondent made reasonable efforts to obtain an ACDP and follow the instructions provided by DEQ. Respondent submitted an ACDP application on August 4, 2025.
- "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 \$20,670. This is the amount Respondent gained by avoiding spending \$21,315 in annual permit fees and delaying spending \$10,900 in initial permit fees since at least July 1, 2021. This "EB" was calculated pursuant to OAR 340-012-0150(1) using the U.S. Environmental Protection Agency's BEN computer model.

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

$$\begin{aligned} &= \$4,000 + [(0.1 \times \$4,000) \times (0 + 0 + 4 + 2 + (-3))] + \$20,670 \\ &= \$4,000 + (\$400 \times 3) + \$20,670 \\ &= \$4,000 + \$1,200 + \$20,670 \\ &= \$25,870 \end{aligned}$$

EXHIBIT 2

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

VIOLATION NO. 2 Failing to conduct a hazardous waste determination in violation of OAR 340-102-0011(2).

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0068(1)(a).

MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0135(4)(a)(B) because Respondent failed to make a hazardous waste determination on spent biomass with bleach added, spent biomass without any additions, and new biomass amended with organic materials.

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)(a)(J) and applicable pursuant to OAR 340-012-0140(3)(b)(A)(ii) because Respondent was a small quantity generator at the time of the violation of a hazardous waste rule.

"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 according to OAR 340-012-0145(2)(a)(A), because there are 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 is no prior history.

"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 is insufficient information on which to base a finding under paragraphs (4)(b) through (4)(d).

"M" is the mental state of the Respondent, and receives a value of 4 according to OAR 340-012-0145(5)(c) because Respondent's conduct 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's waste stream has a history of contributing to the start of multiple fires and at least one explosive reaction. Reasonable care would require the Respondent to research or receive consultation about whether their wastes were hazardous.

"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 made reasonable efforts to

correct the violation. Following the inspection from DEQ, the Respondent made a reasonable effort to make a hazardous waste determination and communicate with DEQ inspectors and staff to determine next steps.

"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 \$1,253. This is the amount Respondent gained by avoiding spending \$1,424 to conduct a hazardous waste determination. This "EB" was calculated pursuant to OAR 340-012-0150(1) using the U.S. Environmental Protection Agency's BEN computer model.

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

$$\begin{aligned} &= \$4,000 + [(0.1 \times \$2,000) \times (0 + 0 + 0 + 4 + (-3))] + \$1,253 \\ &= \$4,000 + (\$200 \times 1) + \$1,253 \\ &= \$4,000 + \$200 + \$1,253 \\ &= \$5,453 \end{aligned}$$

EXHIBIT 3

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

VIOLATION NO. 3 Treating hazardous waste onsite without a required treatment permit in violation of ORS 466.095(1)(c).

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0068(1)(h).

MAGNITUDE: The magnitude of the violation is major pursuant to OAR 340-012-0135(4)(b)(A)(i), because Respondent treated over 330 pounds of hazardous waste onsite without a treatment permit.

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, major magnitude violation in the matrix listed in OAR 340-012-0140(3)(a)(J) and applicable pursuant to OAR 340-012-0140(3)(b)(A)(i) because at the time of the violation of the hazardous waste statute, Respondent was a small quantity generator.

"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 according to OAR 340-012-0145(2)(a)(A), because there are 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 is no prior history.

"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 is insufficient information on which to base a finding under paragraphs (4)(b) through (4)(d).

"M" is the mental state of the Respondent, and receives a value of 4 according to OAR 340-012-0145(5)(c) because Respondent's conduct 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 failed to take reasonable care by researching or seeking consultation concerning the treatment of hazardous waste onsite. There was a foreseeable risk of fires with the ignitable and corrosive waste produced at the facility.

"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 made reasonable efforts to correct the violation. Following the inspection, Respondent cooperated with DEQ and ceased the illegal treatment.

"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 \$6,508. This is the amount Respondent gained by avoiding spending \$7,392 to properly treat the hazardous waste. This "EB" was calculated pursuant to OAR 340-012-0150(1) using the U.S. Environmental Protection Agency's BEN computer model.

PENALTY CALCULATION: $\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (\text{P} + \text{H} + \text{O} + \text{M} + \text{C})] + \text{EB}$
 $= \$8,000 + [(0.1 \times \$8,000) \times (0 + 0 + 0 + 4 + (-3))] + \$6,508$
 $= \$8,000 + (\$800 \times 1) + \$6,508$
 $= \$8,000 + \$800 + \$6,508$
 $= \$15,308$

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)

DATE:	June 25, 2026
RESPONSE DATE*:	September 3, 2026
TOTAL PENALTY:	\$46,631.00

Account Name:	FOURTHREESEVEN MANAGEMENT, LLC DBA BOBSLED EXTRACTS, LLC		
Account Type:	Vendor/Organization/Company	Reference Number:	CPGFD2600120
SubSystem ID:	296700	FIMS Acct. ID:	26713

Penalty Summary

Penalty Amount	Interest	Adjustment	Amount Paid	Total Penalty
\$ 46,631.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 46,631.00

*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.	CPGFD2600120		
PAYCODE:	00401 7400 10040 74001 0500 000000 00		
FEE PROGRAM ID:	950	RESPONSE DATE:	September 3, 2026
FIMS ACCT. ID:	26713	TOTAL PENALTY DUE:	\$46631.00

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 0095000267134CPGFD260012000046631000



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
6/24/2026	2025-626 AQ-ACDP-NWR-2025-626	\$46,631.00

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/ACDP-NWR-2025-626 upon:

9589 0710 5270 0110 5987 ??

U.S. Postal Service [™]	
CERTIFIED MAIL [®] RECEIPT	
Domestic Mail Only	
For delivery information, visit our website at www.usps.com .	
OFFICIAL USE	
Certified Mail Fee	\$
Extra Services & Fees (check box, add fee as appropriate)	
☐ Return Receipt (hardcopy)	\$
☐ Return Receipt (electronic)	\$
☐ Certified Mail Restricted Delivery	\$
☐ Adult Signature Required	\$
☐ Adult Signature Restricted Delivery	\$
Postmark Here	
Postage	
FourThreeSeven Management, LLC dba Bobsled Extracts c/o Sussman Shank Registration Services, LLC, Registered Agent 1000 SW Broadway Street 1400 Portland, Oregon 97222	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

Steven Sweeny
FourThreeSeven Management, LLC
1952 SE Ochoco St
Milwaukie, OR 97222

Andrea Meyer
Sussman Shank LLP
1000 Southwest Broadway, Suite 1400
Portland, OR 97205

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 June 25, 2026

Isaac Griffith

Isaac Griffith, Case Coordinator

Office of Compliance & Enforcement

Department of Environmental Quality