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U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219
BEFORE THE ADMINISTRATOR

In the Matter of)
)
Iowa Fertilizer Company LLC) Docket No. CAA-07-2019-0253
)
Respondent.)

CONSENT AGREEMENT AND FINAL ORDER

Preliminary Statement

The U.S. Environmental Protection Agency, Region 7 (EPA or Complainant), and Iowa Fertilizer Company LLC (Respondent) have agreed to a settlement of this action before the filing of a complaint, and thus this action is simultaneously commenced and concluded pursuant to Rules 22.13(b) and 22.18(b)(2) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, 40 C.F.R. §§ 22.13(b) and 22.18(b)(2).

Jurisdiction

1. This proceeding is an administrative action for the assessment of civil penalties instituted pursuant to Section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d). Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(d), the Administrator and the Attorney General jointly determined that this matter, in which the first date of alleged violation occurred more than twelve months prior to the initiation of the administrative action, was appropriate for administrative penalty action.

2. This Consent Agreement and Final Order serves as notice that the EPA has reason to believe that Respondent has violated the General Duty Clause set forth in Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1), and the Chemical Accident Prevention Provisions in 40 C.F.R. Part 68, promulgated pursuant to Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7), and that Respondent is therefore in violation of Section 112(r) of the CAA, 42 U.S.C. § 7412(r). Furthermore, this Consent Agreement and Final Order serves as notice pursuant to Section 113(d)(2)(A) of the CAA, 42 U.S.C. § 7413(d)(2)(A), of the EPA's intent to issue an order assessing penalties for these violations.

Parties

3. Complainant, by delegation from the Administrator of the EPA and the Regional Administrator, EPA, Region 7, is the Director of the Enforcement and Compliance Assurance Division, EPA, Region 7.

4. Respondent is a company in good standing under the laws of the state of Iowa.

Statutory and Regulatory Background

5. On November 15, 1990, the President signed into law the CAA Amendments of 1990, which added Section 112(r) to Title 1 of the CAA, 42 U.S.C. § 7412(r). The objective of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), is to prevent the accidental release and to minimize the consequences of any such release of any substance listed pursuant to Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), or any other extremely hazardous substance.

6. Pursuant to Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1), commonly referred to as the General Duty Clause, owners and operators of stationary sources producing, processing, handling or storing substances listed pursuant to Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), or any other extremely hazardous substance, have a general duty in the same manner and the same extent as the Occupational Safety and Health Act, 29 U.S.C. § 654 et. seq., to identify hazards which may result from accidental releases using appropriate hazard assessment techniques, to design and maintain a safe facility, taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur.

7. Section 112(r)(3), 42 U.S.C. § 7412(r)(3), mandates the Administrator to promulgate a list of regulated substances which, in the case of an accidental release, are known to cause or may reasonably be anticipated to cause death, injury, or serious adverse effects to human health or the environment. Section 112(r)(5), 42 U.S.C. § 7412(r)(5) mandates that the Administrator establish a threshold quantity for any substance listed pursuant to Section 112(r)(3), 42 U.S.C. § 7412(r)(3). The list of regulated substances with threshold quantities is codified at 40 C.F.R. § 68.130.

8. Section 112(r)(7), 42 U.S.C. § 7412(r)(7), requires the Administrator to promulgate regulations that address release prevention, detection, and correction requirements for stationary sources with threshold quantities of regulated substances listed pursuant to Section 112(r)(3), 42 U.S.C. § 7412(r)(3).

9. On June 20, 1996, the EPA promulgated a final rule known as the Risk Management Program, 40 C.F.R. Part 68, which implements Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7). This rule requires owners and operators of stationary sources to develop and implement a risk management program that includes a hazard assessment, a prevention program and an emergency response program.

10. The regulations at 40 C.F.R. Part 68 set forth the requirements of a risk management program that must be established at each stationary source. The risk management program is described in a Risk Management Plan (RMP) that must be submitted to the EPA.

11. Pursuant to Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7), and 40 C.F.R. § 68.150, an RMP must be submitted for all covered processes by the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process no later than the latter of June 21, 1999, or the date on which a regulated substance is first present above the threshold quantity in a process.

12. The regulations at 40 C.F.R. § 68.10 set forth how the Chemical Accident Prevention Provisions apply to covered processes. Pursuant to 40 C.F.R. § 68.10(d), a covered process is subject to Program 3 requirements if the process does not meet the eligibility requirements of Program 1, as described in 40 C.F.R. § 68.10(b), and it either falls under a specified North American Industry Classification System code or is subject to the OSHA process safety management standard, 29 C.F.R. § 1910.119.

13. Section 113(d) of the CAA, 42 U.S.C. § 7413(d), states that the Administrator may issue an administrative order against any person assessing a civil administrative penalty of up to \$25,000 per day of violation whenever, on the basis of any available information, the Administrator finds that such person has violated or is violating any requirement or prohibition of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and its implementing regulations. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, as amended, and the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, 28 U.S.C. § 2461, and implementing regulations at 40 C.F.R. Part 19, increased these statutory maximum penalties to \$37,500 for violations that occurred before November 2, 2015, and to \$47,357 for violations that occur after November 2, 2015, and are assessed after February 6, 2019.

Definitions

14. Section 302(e) of the CAA, 42 U.S.C. § 7602(e), defines “person” to include any individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency department, or instrumentality of the United States and any officer, agent, or employee thereof.

15. Section 112(r)(2)(A) of the CAA, 42 U.S.C. § 7412(r)(2)(A), defines “accidental release” as an unanticipated emission of a regulated substance or other extremely hazardous substance into the ambient air from a stationary source.

16. Section 112(r)(2)(C) of the CAA, 42 U.S.C. § 7412(r)(2)(c), and the regulations at 40 C.F.R. § 68.3 define “stationary source,” in part, as any buildings, structures, equipment, installations or substance-emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur.

17. The regulations at 40 C.F.R. § 68.3 define “regulated substance” as any substance listed pursuant to Section 112(r)(3) of the CAA, as amended, in 40 C.F.R. § 68.130.

18. The regulations at 40 C.F.R. § 68.3 define “threshold quantity” as the quantity specified for regulated substances pursuant to Section 112(r)(5) of the CAA, as amended, listed in 40 C.F.R. § 68.130 and determined to be present at a stationary source as specified in 40 C.F.R. § 68.115.

19. The regulations at 40 C.F.R. § 68.3 define “process” as any activity involving a regulated substance including any use, storage, manufacturing, handling or on-site movement of such substances, or combination of these activities. For the purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

EPA’s General Factual Allegations

20. Respondent is, and at all times referred to herein was, a “person” as defined by Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

21. Respondent is, and at all times referred to herein was, the owner and operator of the facility located at 3550 180th Street Wever, Iowa 52658 (Respondent’s Facility). Respondent’s Facility is a “stationary source” pursuant to Section 112(r)(2)(C), 42 U.S.C. § 7412(r)(3)(C), and 40 C.F.R. § 68.3.

22. Anhydrous ammonia, methane, hydrogen, ethane, and propane are each a “regulated substance” pursuant to 40 C.F.R. § 68.3 (the regulated substances). The threshold quantity for each of the regulated substances, as listed in 40 C.F.R. § 68.130, is 10,000 pounds.

23. On or about July 10–11, 2018, representatives of the EPA conducted an inspection of Respondent’s Facility to determine compliance with Section 112(r) of the CAA and 40 C.F.R. Part 68.

24. Information gathered during the EPA inspection revealed that Respondent had greater than 10,000 pounds of ammonia, mixtures of methane and hydrogen, and mixtures of ethane, propane, and methane, in a process at Respondent’s Facility.

25. From the time Respondent first had onsite greater than 10,000 pounds of any of the regulated substances or mixtures of the regulated substances in a process, Respondent was subject to the requirements of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and 40 C.F.R. Part 68 because it was an owner and operator of a stationary source that had more than a threshold quantity of a regulated substance in a process.

26. From the time Respondent first had onsite greater than 10,000 pounds of any of the regulated substances or mixtures of the regulated substances in a process, Respondent was subject to the Program 3 prevention program requirements because pursuant to 40 C.F.R. § 68.10(d), the covered process at its facility did not meet the eligibility requirements of Program

1, is in North American Industry Classification System code 325199, and was subject to the OSHA process safety management standard, 29 C.F.R. § 1910.119.

27. From the time Respondent first had onsite greater than 10,000 pounds of any of the regulated substances or mixtures of the regulated substances in a process, Respondent was required under Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7), to submit an RMP pursuant to 40 C.F.R. § 68.12(a) and comply with the Program 3 requirements provided at 40 C.F.R. § 68.12(d).

Allegations of Violation

28. Complainant hereby states and alleges that Respondent has violated the CAA and federal regulations promulgated thereunder as follows:

Count 1

29. The General Factual Allegations stated in Paragraphs 20 through 27 above are herein incorporated.

30. Pursuant to Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1), owners and operators of stationary sources producing, processing, handling or storing substances listed pursuant to Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), or any other extremely hazardous substance, have a general duty in the same manner and the same extent as the Occupational Safety and Health Act, 29 U.S.C. § 654 et. seq., to identify hazards which may result from accidental releases using appropriate hazard assessment techniques, to design and maintain a safe facility, taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur.

31. Information gathered during the EPA inspection revealed that on or about April 10, 2017, an excess of pressure in the loading line caused liquid anhydrous ammonia to route to the flare, which extinguished the flare and caused an accidental release of 1,238 pounds of anhydrous ammonia. The flare system did not include an adequately sized mechanism to separate liquid from gas. Such a mechanism would prevent liquid anhydrous ammonia from reaching the flare and releasing, or minimize the amount of liquid anhydrous ammonia reaching the flare and releasing. As a result, Respondent failed to meet its general duty to design and maintain a safe facility taking such steps as were necessary to prevent releases and failed to minimize the consequences of the accidental release.

32. Respondent's failure design and maintain a safe facility taking such steps as were necessary to prevent releases and failure to minimize the consequences of the accidental release, are violations of Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1).

Count 2

33. The General Factual Allegations stated in Paragraphs 20 through 27 above are herein incorporated.

34. The regulation at 40 C.F.R. § 68.12(a) requires the owner or operator of a stationary source subject to the Risk Management Program, 40 C.F.R. Part 68, to submit a single RMP, as provided in 40 C.F.R. §§ 68.150 to 68.185. Pursuant to 40 C.F.R. §§ 68.165(a)(2) and (b)(11), the owner or operator of a Program 3 process shall submit distance to endpoint data as part of the offsite consequence analysis in the RMP.

35. Information that was gathered during the EPA inspection and was self-reported to the EPA inspector, at the start of the inspection, revealed that Respondent submitted inaccurate distance to endpoint data for the offsite consequence analysis in the RMP submitted on September 8, 2016.

36. Respondent's failure to accurately report distance to endpoint data in the RMP pursuant to 40 C.F.R. §§ 68.165(a)(2) and (b)(11), as required by 40 C.F.R. § 68.12(a), is a violation of Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7).

Count 3

37. The General Factual Allegations stated in Paragraphs 20 through 27 above are herein incorporated.

38. The regulation at 40 C.F.R. § 68.12(a) requires the owner or operator of a stationary source subject to the Risk Management Program, 40 C.F.R. Part 68, to submit a single RMP, as provided in 40 C.F.R. §§ 68.150 to 68.185. Pursuant to 40 C.F.R. § 68.150(d) submitted RMPs shall be corrected in accordance with 40 C.F.R. § 68.195, which requires the owner or operator to correct the RMP with new five-year accident history information within six months of a release meeting the reporting criteria of 40 C.F.R. § 68.42. The five-year accident history criteria in 40 C.F.R. § 68.42 includes all accidental release from covered processes that resulted in injuries.

39. Information that was gathered during the EPA inspection and was self-reported to the EPA inspector, at the start of the inspection, revealed a release occurred on April 8, 2017, at Respondent's Facility that resulted in an injury meeting the reporting criteria of 40 C.F.R. § 68.42 and requiring correction to the RMP (originally submitted September 8, 2016) within six months of the release in accordance with 40 C.F.R. § 195. Respondent updated the RMP to include five-year accident history information for the April 8, 2017, release on August 30, 2018, 28 months after the release.

40. Respondent's failure to correct the five-year accident history information in the RMP within six months of the April 8, 2017, release pursuant to 40 C.F.R. § 68.150(d), as required by 40 C.F.R. § 68.12(a), is a violation of Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7).

Count 4

41. The General Factual Allegations stated in Paragraphs 20 through 27 above are herein incorporated.

42. The regulation at 40 C.F.R. § 68.12(d)(3) requires the owner or operator of a stationary source with a process subject to Program 3 to implement the prevention requirements of 40 C.F.R. §§ 68.65 through 68.87. Pursuant to 40 C.F.R. § 68.69(a)(2) and (a)(3), the owner or operator shall develop and implement written operating procedures that address operating limits and safety and health considerations.

43. Information gathered during the EPA inspection revealed that Respondent developed and employed operating procedures using two systems. Complainant contends that by not integrating the systems Respondent failed to develop operating procedures that addressed operating limits and safety and health considerations, which were included in a tracking system separate from the operating procedures.

44. Respondent's failure to develop operating procedures that address operating limits and safety and health considerations pursuant to 40 C.F.R. § 68.69(a)(2) and (a)(3), as required by 40 C.F.R. § 68.12(d)(3), is a violation of Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7).

Count 5

45. The General Factual Allegations stated in Paragraphs 20 through 27 above are herein incorporated.

46. The regulation at 40 C.F.R. § 68.12(d)(3) requires the owner or operator of a stationary source with a process subject to Program 3 to implement the prevention requirements of 40 C.F.R. §§ 68.65 through 68.87. Pursuant to 40 C.F.R. § 68.69(c), the owner or operator shall certify annually that the operating procedures are current and accurate.

47. Information gathered during the EPA inspection revealed that Respondent failed to certify that the operating procedures were current and accurate.

48. Respondent's failure to certify that the operating procedures were current and accurate pursuant to 40 C.F.R. § 68.69(c), as required by 40 C.F.R. § 68.12(d)(3), is a violation of Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7).

Count 6

49. The General Factual Allegations stated in Paragraphs 20 through 27 above are herein incorporated.

50. The regulation at 40 C.F.R. § 68.12(d)(3) requires the owner or operator of a stationary source with a process subject to Program 3 to implement the prevention requirements of 40 C.F.R. §§ 68.65 through 68.87. Pursuant to 40 C.F.R. § 68.87(b)(1), the owner or operator, when selecting a contractor, shall obtain and evaluate information regarding the contract owner or operator's safety performance and programs.

51. Information gathered during the EPA inspection revealed that Respondent failed to verify that contractors documented their required employee training.

52. Respondent's failure to obtain and evaluate contractor safety performance information prior to selecting contractors pursuant to 40 C.F.R. § 68.87(b)(1), as required by 40 C.F.R. § 68.12(d)(3), is a violation of Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7).

Count 7

53. The General Factual Allegations stated in Paragraphs 20 through 27 above are herein incorporated.

54. The regulation at 40 C.F.R. § 68.12(d)(3) requires the owner or operator of a stationary source with a process subject to Program 3 to implement the prevention requirements of 40 C.F.R. §§ 68.65 through 68.87. Pursuant to 40 C.F.R. § 68.73(f)(2), in the construction of new plants and equipment, the owner or operator shall perform appropriate checks and inspections to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions.

55. Information gathered during the EPA inspection revealed that in the construction of Respondent's Facility, a compression fitting was not tightened to the manufacturer's torque specifications, causing the compression fitting to not engage and seal the connection and resulting in an accidental release of hydrogen.

56. Respondent's failure to assure that the compression fitting was installed consistent with the manufacturer's torque specifications pursuant to 40 C.F.R. § 68.73(f)(2), as required by 40 C.F.R. § 68.12(d)(3), is a violation of Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7).

CONSENT AGREEMENT

57. For the purpose of this proceeding only, as required by 40 C.F.R. § 22.18(b)(2), Respondent:

- (a) admits the jurisdictional allegations set forth herein;

- (b) neither admits nor denies the specific factual allegations or conclusions of law stated in the Allegations of Violation herein;
- (c) consents to the assessment of a civil penalty, as stated herein;
- (d) consents to any conditions specified herein;
- (e) waives any right to contest the allegations set forth herein; and
- (f) waives its rights to appeal the Final Order accompanying this Consent Agreement.

58. Respondent consents to the issuance of this Consent Agreement and Final Order and consents for the purposes of settlement to the payment of the civil penalty specified herein.

59. Respondent and EPA agree to conciliate this matter without the necessity of a formal hearing and to bear their respective costs and attorneys' fees.

Penalty Payment

60. Respondent agrees that, in settlement of the claims alleged herein, Respondent shall pay a civil penalty of One Hundred Forty-Four Thousand Five Hundred Forty-Three Dollars (\$144,543), as set forth below.

61. Respondent shall pay the penalty within thirty (30) days of the effective date of the Final Order. Such payment shall identify Respondent by name and docket number and shall be by certified or cashier's check made payable to the "United States Treasury" and sent to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
PO Box 979077
St. Louis, Missouri 63197-9000

or by alternate payment method described at <http://www.epa.gov/financial/makepayment>.

62. A copy of the check or other information confirming payment shall simultaneously be sent to the following:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219; and

Clarissa Howley Mills, Attorney
Office of Regional Counsel

U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

63. Respondent understands that its failure to timely pay any portion of the civil penalty may result in the commencement of a civil action in Federal District Court to recover the full remaining balance, along with penalties and accumulated interest. In such case, interest shall begin to accrue on a civil or stipulated penalty from the date of delinquency until such civil or stipulated penalty and any accrued interest are paid in full. 31 C.F.R. § 901.9(b)(1). Interest will be assessed at a rate of the United States Treasury Tax and loan rates in accordance with 31 U.S.C. § 3717. Additionally, a charge will be assessed to cover the costs of debt collection including processing and handling costs, and a non-payment penalty charge of six (6) percent per year compounded annually will be assessed on any portion of the debt which remains delinquent more than ninety (90) days after payment is due. 31 U.S.C. § 3717(e)(2).

Effect of Settlement and Reservation of Rights

64. Full payment of the penalty proposed in this Consent Agreement shall only resolve Respondent's liability for federal civil penalties for the factual allegations and violations alleged herein. Complainant reserves the right to take any enforcement action with respect to any other violations of the CAA or any other applicable law.

65. The effect of settlement described in the immediately preceding paragraph is conditioned upon the accuracy of Respondent's representations to the EPA, as memorialized in paragraph directly below.

66. To the best knowledge and belief of Respondent, Respondent certifies by the signing of this Consent Agreement that it is presently in compliance with all requirements of the CAA and its implementing regulations.

67. Full payment of the penalty proposed in this Consent Agreement shall not in any case affect the right of the Agency or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law. This Consent Agreement and Final Order does not waive, extinguish or otherwise affect Respondent's obligation to comply with all applicable provisions of the CAA and regulations promulgated thereunder.

68. Complainant reserves the right to enforce the terms and conditions of this Consent Agreement and Final Order.

General Provisions

69. By signing this Consent Agreement, the undersigned representative of Respondent certifies that he or she is fully authorized to execute and enter into the terms and conditions of this Consent Agreement and has the legal capacity to bind the party he or she represents to this Consent Agreement.

70. This Consent Agreement shall not dispose of the proceeding without a final order from the Regional Judicial Officer or Regional Administrator ratifying the terms of this Consent Agreement. This Consent Agreement and Final Order shall be effective upon the filing of the Final Order by the Regional Hearing Clerk for EPA, Region 7. Unless otherwise stated, all time periods stated herein shall be calculated in calendar days from such date.

71. The penalty specified herein shall represent civil penalties assessed by EPA and shall not be deductible for purposes of Federal, State and local taxes.

72. This Consent Agreement and Final Order shall apply to and be binding upon Respondent and Respondent's agents, successors and/or assigns. Respondent shall ensure that all contractors, employees, consultants, firms, or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this Consent Agreement and Final Order.

RESPONDENT:
IOWA FERTILIZER COMPANY LLC

Date: 9/10/2019



Signature

KEVIN STRAVIS

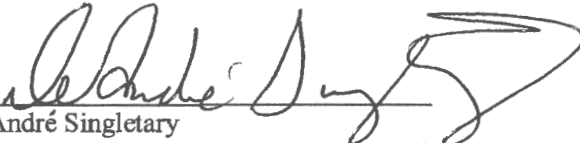
Name

MANAGER

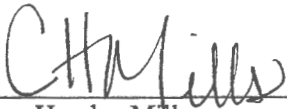
Title

**COMPLAINANT:
U.S. ENVIRONMENTAL PROTECTION AGENCY**

Date: 9-17-19


DeAndré Singletary
Acting Director, Enforcement and Compliance
Assurance Division
U.S. Environmental Protection Agency, Region 7

Date: 9/17/2019



Clarissa Howley Mills
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 7

FINAL ORDER

Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(d), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, 40 C.F.R. Part 22, the foregoing Consent Agreement resolving this matter is hereby ratified and incorporated by reference into this Final Order.

Respondent is ORDERED to comply with all of the terms of the Consent Agreement. In accordance with 40 C.F.R. § 22.31(b), the effective date of the foregoing Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

IT IS SO ORDERED.


Karina Borromeo
Karina Borromeo
Regional Judicial Officer

Sept. 18, 2019
Date

CERTIFICATE OF SERVICE

I certify that that a true and correct copy of the foregoing Consent Agreement and Final Order was sent this day in the following manner to the addressees:

Copy via Email to Complainant:

mills.clarissa@epa.gov

Copy via Email to Respondent:

cfbecker@belinmccormick.com

Dated this 18th day of September 2019.

(3356495)

Signed

Cenna M. Rely for
Lisa Haugen Regional
Hearing Clerk