

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 7
2016 JUN 20 PM 2:57

IN THE MATTER OF:

Iowa City, Iowa Sanitary Landfill
3900 Hebl Avenue
Iowa City, Iowa

CONSENT AGREEMENT AND FINAL
ORDER
CAA Docket No: 07-2016-0027

I. PRELIMINARY STATEMENT

1. The United States Environmental Protection Agency (EPA), Region 7 (Complainant) and the City of Iowa City, Iowa (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, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits (Consolidated Rules of Practice), 40 Code of Federal Regulations (C.F.R.) §§ 22.13(b) and 22.18(b)(2). This Consent Agreement and Final Order is a complete and final settlement of all civil and administrative claims and causes of action for the violations set forth in this Consent Agreement and Final Order subject to paragraphs 74 and 75.

II. JURISDICTION

2. This administrative action for the assessment of civil penalties is instituted pursuant to Section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d), and in accordance with the Consolidated Rules of Practice.

3. Section 113(d) of the CAA 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 the CAA referenced therein, including Section 111(e) of the CAA, 42 U.S.C. § 7411(e). Section 113(d)(2)(B) of the CAA, 42 U.S.C. § 7413(d)(2)(B), provides that the EPA Administrator may compromise, modify, or remit, with or without conditions, any administrative penalty which may be imposed under Section 113(d) of the CAA. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, and its implementing regulations at 40 C.F.R. Part 19, increased these statutory maximum penalties to no more than \$32,500 per day for each violation occurring between March 15, 2004, and January 12, 2009; and no more than \$37,500 per day for each violation occurring after January 12, 2009.

4. The EPA Administrator and the United States Attorney General, through their delegated representatives, have jointly determined that this administrative penalty action is appropriate for a larger penalty amount or longer period of violation than the time and penalty limitations set forth in Section 113(d) of the CAA.

III. PARTIES

5. The Complainant, by delegation from the Administrator of the EPA, and the Regional Administrator of the EPA, Region 7, is the Director of the Air and Waste Management Division, EPA Region 7.

6. Respondent, the City of Iowa City, Iowa, owns and operates an existing municipal solid waste (MSW) landfill.

IV. STATUTORY AND REGULATORY FRAMEWORK

7. The Clean Air Act establishes a regulatory framework designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population. 42 U.S.C. § 7401.

8. Section 111 of the CAA, 42 U.S.C. § 7411, authorizes the EPA to develop technology based standards which apply to specific categories of stationary sources. The New Source Performance Standards (NSPS) apply to new, modified and reconstructed affected facilities in specific source categories. The NSPS are developed and implemented by EPA and are delegated to the states. However, even when delegated to the states, EPA retains authority to implement and enforce the NSPS.

9. Pursuant to the authority granted under Section 111 of the CAA, 42 U.S.C. § 7411, the EPA promulgated general regulations applicable to all NSPS source categories in 40 C.F.R. Part 60, Subparts A, B, and C. In addition, the EPA promulgated regulations set forth at 40 C.F.R. Part 60, Subpart WWW, which apply to municipal solid waste landfills that commence construction, reconstruction, or modification on or after May 30, 1991.

10. Subpart WWW was promulgated due to EPA's determination that emissions from municipal solid waste landfills cause, or contribute significantly to, air pollution which may reasonably be anticipated to endanger public health or welfare. Landfill emissions consist primarily of methane and CO₂, as well as more than 100 different non-methane organic compounds (NMOCs) such as ethane, toluene and benzene. These NMOCs contribute to ozone formation, which in turn can lead to alterations in pulmonary function, aggravation of pre-existing respiratory disease, and damage to lung structure. Ozone also can cause reduced plant growth and decreased crop yield. Some NMOCs are also known or suspected carcinogens and

can cause noncancer health effects such as adverse effects on the kidneys, liver and central nervous system. NMOCs in landfill gas emissions can also cause an odor nuisance. Methane can cause explosions and fires resulting from its migration to on- and off-site structures or enclosures. It is also a greenhouse gas that leads to climate change.

11. 40 C.F.R. Part 60, Subpart A, the General Provisions, apply to owners or operators of any stationary source which contains an affected facility. The applicable parts of the General Provisions include § 60.11(d), which states: at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

12. The Respondent is subject to 40 C.F.R. Part 60, Subpart WWW because it owns or operates a MSW landfill that was modified on or after May 30, 1991.

13. Each owner or operator of a MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters is subject to part 70 or 71 permitting requirements and shall calculate a nonmethane organic compound emission rate (NMOC) in accordance with 40 C.F.R. § 60.754. 40 C.F.R. § 60.752(b).

14. If the calculated NMOC is above 50 megagrams per year, the MSW landfill must install a collection and control system that captures gas generated in the landfill. 40 C.F.R. § 60.752(b)(2)(ii). The collection and control system shall be designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control or treatment system equipment; collect gas from each area, cell or group of cells in the landfill in which the initial solid waste has been placed for a period of 5

years or more if active or 2 years or more if closed; collect gas at a sufficient extraction rate; and be designed to minimize off-site migration of subsurface gas. 40 C.F.R. § 60.752(b)(2)(ii)(A).

15. 40 C.F.R. § 60.755(a)(5) requires owners or operators of the landfill to monitor each well monthly for nitrogen or oxygen exceedances as provided in 40 C.F.R. § 60.753(c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within five calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance.

16. 40 C.F.R. § 60.755(a)(3) requires the owner or operator of the landfill to measure the gauge pressure in the gas collection header at each individual well monthly. If a positive pressure exists, action shall be initiated to correct the exceedance in five calendar days, except for the three conditions allowed under 40 C.F.R. § 60.753(b). If negative pressure cannot be achieved without excess air infiltration within fifteen calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure.

17. 40 C.F.R. § 60.755(c) states the following procedures shall be used for compliance with the surface methane operational standard as provided in 40 C.F.R. § 60.753(d):

(1) After installation of the collection system, the owner or operator shall monitor surface concentrations of methane along the entire perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals (or a site-specific established spacing) for each collection area on a quarterly basis using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in paragraph (d) of this section; (2) The background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells; (3) Surface emission monitoring shall be performed in accordance with section 4.3.1 of Method 21 of appendix A of this part, except that the probe inlet

shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions.

18. 40 C.F.R. § 60.755(c)(4) states that to comply with the surface methane operational standard as provided in 40 C.F.R. § 60.753(d), any reading of 500 parts per million (ppm) or above background at any location shall be recorded as a monitored exceedance and the actions specified in 40 C.F.R. §§ 60.755(c)(4)(i) through (v) shall be taken. 40 C.F.R. §§ 60.755(c)(4)(i) through (v) require marking the location of each monitored exceedance; making cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance and re-monitoring the location within 10 days of the exceedance; if re-monitoring of the location shows a second exceedance, taking additional corrective action and re-monitoring within 10 days of the second exceedance; monthly monitoring if the second re-monitoring event does not exceed 500 ppm above background and quarterly monitoring thereafter if there is no exceedance of the 500 ppm above background standard; a new well or collection device installation only if the location exceeds the 500 ppm above background standard three times within a quarterly period.

Method 21 (Determination of Volatile Organic Compound Leaks) states in pertinent part,

4.3.1 Type I - Leak Definition Based on Concentration. Place the probe inlet at the surface of the component interface where leakage could occur. Move the probe along the interface periphery while observing the instrument readout. If an increased meter reading is observed, slowly sample the interface where leakage is indicated until the maximum meter reading is obtained. Leave the probe inlet at this maximum reading location for approximately two times the instrument response time. If the maximum observed meter reading is greater than the leak definition in the applicable regulation, record and report the results as specified in the regulation reporting requirements.

19. 40 C.F.R. § 60.753(d) states the landfill operator shall operate the collection

system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing around the perimeter of the collection area along a pattern that traverses the landfill at 30 meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover.

20. 40 C.F.R. § 60.755(a)(2) states that for purposes of determining sufficient density of gas collectors for compliance with 40 C.F.R. § 60.752(b)(2)(ii)(A)(2), the owner or operator shall design a system of vertical wells, horizontal collectors, or other collection devices, satisfactory to the Administrator, capable of controlling and extracting gas from all portions of the landfill sufficient to meet all operational and performance standards.

21. 40 C.F.R. § 60.753(a)(1) states the owner or operator shall “[o]perate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill for 5 years or more if active.”

22. 40 C.F.R. § 60.752(b)(2)(ii)(A) states that an active collection system shall: (1) Be designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control or treatment system equipment; (2) Collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of: (i) 5 years or more if active; (3) Collect gas at a sufficient extraction rate; (4) Be designed to minimize off-site migration of subsurface gas.

23. 40 C.F.R. § 60.755(c)(5) states “the owner or operator shall implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.”

24. After the effective date of any standard of performance promulgated under Section 111 of the CAA and applicable to a source, no person may operate such source in

violation of such standard, limitation or regulation. 42 U.S.C. § 7411(e).

A. Definitions

25. A “municipal solid waste landfill” or “MSW landfill” means an entire disposal facility in a contiguous geographical space where household waste is placed in or on the land. An MSW landfill may be publicly or privately owned. 40 C.F.R. § 60.751.

26. “Active collection system” means a gas collection system that uses gas mover equipment. 40 C.F.R. § 60.751.

B. Factual Background

27. At all times pertinent to this action, Iowa City was the “owner” and “operator” of a municipal solid waste landfill located at 3900 Hebl Avenue, Iowa City, Iowa within the meaning of Section 111(a)(5) of the Act, 42 U.S.C. § 7411(a)(5).

28. At all times pertinent to this action, the Iowa City Landfill was a “stationary source” as that term is defined in Section 111(a)(3) of the Act, 42 U.S.C. § 7411(a)(3).

29. At all times pertinent to this action, Iowa City operated a disposal facility in a contiguous space where household waste was placed in or on the land, and is, therefore, a “municipal solid waste landfill” as defined by 40 C.F.R. § 60.751.

30. At all times pertinent to this action, the MSW landfill had a capacity of 2.5 million megagrams and 2.5 million cubic meters.

31. At all times pertinent to this action, the MSW landfill had a NMOC emission rate of 50 megagrams per year or greater.

32. At all times pertinent to this action, the MSW landfill operated an active gas collection system, as defined by 40 C.F.R. § 60.751.

33. EPA conducted an inspection of the Iowa City MSW landfill on July 15, 2014.

EPA took measurements using an optical gas imaging camera.

34. EPA issued a Request for Information to Iowa City on December 12, 2014. Iowa City provided a response on March 18, 2015.

35. EPA issued a Finding of Violation to Iowa City on September 3, 2015.

V. ALLEGED VIOLATIONS OF LAW

36. 40 C.F.R. § 60.753(a)(1) requires Iowa City to operate the MSW landfill active gas collection system such that gas is collected from each area, cell, or group of cells in the landfill. At the time of the July 15, 2014, EPA inspection, methane gas in excess of 50,000 parts per million (ppm) was discovered through the use of the optical gas imaging camera and the flame ionization detector, coming from manhole covers at the base of the east side of the landfill. Therefore, Iowa City violated the requirements of 40 C.F.R. § 60.753(a)(1) by failing to collect gas from each area of the landfill. In addition, these releases demonstrate that Respondent has failed to operate and maintain an affected facility in a manner consistent with good air pollution control practices for minimizing emissions at all times, in violation of 40 C.F.R. § 60.11(d) of the General Provisions.

37. 40 C.F.R. § 60.755(a)(3) requires Iowa City to monitor the gauge pressure in the gas collection wells monthly. If a well exhibits positive pressure then it must be corrected within 15 days. If negative pressure is not achieved within 15 days, then the gas collection system must be expanded within 120 days. During the time period from July 2013 to June 2014, Iowa City conducted monthly monitoring of the MSW landfill's gas extraction wells and discovered 13 different wells had positive pressure. Iowa City failed to remonitor the wells within 15 days to determine if negative pressure was achieved. Iowa City monitoring records documented four of the wells exhibited positive pressure in consecutive months.

Well Number	Consecutive Months of Positive Pressure
101	07/2013 – 08/2013
126	07/2013 – 08/2013
T4A	07/2013 – 08/2013
T5	07/2013 – 08/2013

Therefore, Iowa City failed to expand the gas collection system when negative pressure was not achieved in violation of 40 C.F.R. § 60.755(a)(3). In addition, these ongoing instances of positive pressure demonstrate that Respondent has failed to operate and maintain an affected facility in a manner consistent with good air pollution control practices for minimizing emissions at all times, in violation of 40 C.F.R. § 60.11(d) of the General Provisions.

38. 40 C.F.R. § 60.755(a)(5) requires Iowa City to monitor the gas collection wells monthly. If monitoring reveals the landfill gas contains oxygen at 5% or greater, then the oxygen concentration must be corrected within 15 days. If the oxygen concentration of less than 5% cannot be achieved within 15 days, then the gas collection system is to be expanded within 120 days. During the time period of July 2013 to June 2014, Iowa City conducted monthly monitoring of the landfill’s gas extraction wells and discovered 29 different wells exhibited oxygen concentrations of 5% or greater. Iowa City documented action taken to correct the oxygen deviation, however, Iowa City failed to remonitor the wells to determine if oxygen concentration of less than 5% was achieved, as required at 40 C.F.R. § 60.755(a)(5). Iowa City monitoring records documented 18 of the wells exhibited oxygen concentrations over 5% in consecutive months. Four wells exceeded the oxygen concentration of 5% during the entire 12 month period.

Well Number	Consecutive Months of Oxygen 5% or Greater
103	7/2013 - 8/2013
106	7/2013 - 6/2014
108	7/2013 - 6/2014
109	7/2013 - 10/2013; 1/2014 - 6/2014

Well Number	Consecutive Months of Oxygen 5% or Greater
111	8/2013 - 9/2013; 12/2013 - 6/2014
116	7/2013 - 9/2013
117	7/2013 - 8/2013
122	8/2013 - 10/2013; 12/2013 - 2/2014
123	7/2013 - 6/2014
125	11/2013 - 4/2014
128	7/2013 - 8/2013
136	8/2013 - 9/2013
137	5/2014 - 6/2014
T1A	7/2013 - 9/2013; 12/2013 - 6/2014
T2A	7/2013 - 9/2013; 11/2013 - 6/2014
T3A	11/2013 - 5/2014
T4A	7/2013 - 6/2014
T4B	7/2013 - 2/2014

Therefore, Iowa City also failed to expand the gas collection system when oxygen concentration of less than 5% was not achieved within 15 days, as required at 40 C.F.R. § 60.755(a)(5). In addition, these oxygen deviations demonstrate that Respondent has failed to operate and maintain an affected facility in a manner consistent with good air pollution control practices for minimizing emissions at all times, in violation of § 60.11(d) of the General Provisions.

39. 40 C.F.R. § 60.755(c) specifies the procedures to be followed to comply with the surface emission monitoring required at 40 C.F.R. § 60.753(d). The procedures include performing the surface emission monitoring in accordance with section 4.3.1 of EPA Method 21. Section 4.3.1 of EPA Method 21 states that if an increased meter reading is observed, slowly sample the interface where leakage is indicated until the maximum meter reading is obtained. Leave the probe inlet at the maximum reading location for approximately two times the instrument response time. At the time of the July 15, 2014, EPA inspection, Iowa City provided the EPA inspector with a demonstration of how surface emission monitoring was conducted. Iowa City conducts surface emission monitoring by collecting methane readings from a moving vehicle. Iowa City failed to comply with 40 C.F.R. § 60.755(c) because surface emission

monitoring was not conducted in accordance with section 4.3.1 of EPA Method 21. In addition, this incorrect monitoring procedure demonstrates that Respondent has failed to operate and maintain an affected facility in a manner consistent with good air pollution control practices for minimizing emissions at all times, in violation of 40 C.F.R. § 60.11(d) of the General Provisions.

40. 40 C.F.R. § 60.755(c)(4) requires Iowa City to conduct surface emission monitoring of the landfill surface and remonitor areas with methane surface emissions of 500 ppm or greater above background within 10 days. Iowa City documented actions taken when methane surface emissions of 500 ppm or greater were discovered. However, Iowa City did not remonitor the area within 10 days to ensure methane emissions were below 500 ppm. Therefore, Iowa City failed to comply with 40 C.F.R. § 60.755(c)(4). In addition, these methane releases demonstrate that Respondent has failed to operate and maintain an affected facility in a manner consistent with good air pollution control practices for minimizing emissions at all times, in violation of § 60.11(d) of the General Provisions.

41. 40 C.F.R. § 60.755(c)(5) requires Iowa City to implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis. During the time period of July 2013 to June 2014, Iowa City failed to comply with 40 C.F.R. § 60.755(c)(5) because it was not conducting monthly surface integrity monitoring. In addition, this failure to conduct monthly monitoring demonstrates that Respondent has failed to operate and maintain an affected facility in a manner consistent with good air pollution control practices for minimizing emissions at all times, in violation of 40 C.F.R. § 60.11(d) of the General Provisions.

VI. TERMS OF CONSENT AGREEMENT

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

- a. Admits that the EPA has jurisdiction over the subject matter alleged in this Consent Agreement and Final Order;
 - b. Neither admits nor denies the alleged violations of law stated above;
 - c. Consents to the assessment of a civil penalty as stated below;
 - d. Consents to the issuance of any specified compliance or corrective action order;
 - e. Consents to the conditions specified in this Consent Agreement and Final Order;
 - f. Consents to any stated Permit Action;
 - g. Waives any right to contest the alleged violations of law set forth in Section V of this Consent Agreement and Final Order; and
 - h. Waives its rights to appeal the Final Order portion of this Consent Agreement.
43. For the purpose of this proceeding, Respondent:
- a. Agrees that this Consent Agreement states a claim upon which relief may be granted against Respondent;
 - b. Acknowledges that this Consent Agreement constitutes an enforcement action for purposes of considering Respondent's compliance history in any subsequent enforcement actions;
 - c. Waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this Consent Agreement and Final Order, including any right of judicial review under Section 307(b)(1)

of the Clean Air Act, 42 U.S.C. § 7607(b)(1);

- d. Consents to personal jurisdiction in any action to enforce this Consent Agreement or Final Order, or both, in the United States District Court; and
- e. Waives any rights it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to compel compliance with the Consent Agreement and Final Order, and to seek an additional penalty for such noncompliance, and agrees that federal law shall govern in any such civil action.

A. Penalty Payment

44. Respondent agrees that, in settlement of the claims alleged in this Consent Agreement and Final Order, Respondent shall pay the civil penalty of \$8,225.00, within thirty days of the effective date of this Final Order, and shall perform a Supplemental Environmental Project (“SEP”) as set forth in this Consent Agreement and Final Order. The cost of the SEP is \$109,092.

45. Payment of the penalty may be submitted on-line at *www.pay.gov* by entering “SFO 1.1” in the “Search Public Forms” field. Open the on-line form and complete required fields to complete payment. Respondent shall print a copy of each payment receipt and mail a copy of each receipt to EPA’s representative identified in this paragraph:

Regional Hearing Clerk
Enforcement Coordination Office
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

and to

Gary Bertram
AWMD/ACES
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

Payments may also be made by cashier or certified check made payable to

“Treasurer of the United States” and remitted to:

U.S. Environmental Protection Agency
Fines and Penalties - CFC
P.O. Box 979077
St. Louis, Missouri 63197-9000.

The Respondent shall reference the EPA Docket Number on the check. A copy of the check shall be provided to EPA’s representatives identified in this paragraph.

46. If Respondent fails to timely pay any portion of the EPA Penalty assessed under this Consent Agreement, including any stipulated penalty assessed pursuant to this Consent Agreement, the EPA may

- a. Request the Attorney General to bring a civil action in an appropriate district court to recover: the amount assessed; interest at rates established pursuant to 26 U.S.C. § 6621(a)(2); the United States’ enforcement expenses; and a 10 percent quarterly nonpayment penalty, 42 U.S.C. § 7413(d)(5);
- b. Refer the debt to a credit reporting agency or a collection agency, 42 U.S.C. § 7413(d)(5); 40 C.F.R. §§ 13.13, 13.14, and 13.33;
- c. Collect the debt by administrative offset (i.e. the withholding of money payable by the United States to, or held by the United States for, a person to satisfy the debt the person owes the Government), which includes but is

not limited to, referral to the Internal Revenue Service for offset against tax refunds, 40 C.F.R. Part 13, Subparts C and H; and

- d. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, 40 C.F.R. § 13.17.

B. Conditions

47. Although the parties acknowledge that many, if not most, of the measures agreed to herein are already in progress due to the voluntary efforts of Respondent, as a condition of settlement and in compromise of the civil penalty that EPA could otherwise impose herein, Respondent agrees to perform the following at the Iowa City Sanitary Landfill:

48. Standard Operating Procedures and Training to Improve Monitoring Activities:

- a. By no later than 30 days after the effective date of this Consent Agreement and Final Order, Iowa City shall provide to EPA a diagram of the landfill that includes, but is not limited to, the existing location of all landfill gas and leachate collection devices, probes, collection lines, and access points (including any manholes).
- b. By no later than 90 days after the effective date of this Consent Agreement and Final Order, Iowa City shall develop and submit to EPA for review and approval a document that describes, for the Iowa City Sanitary Landfill:
 - i. Improved Gas Collection Well Monitoring: (i) the affirmative steps (i.e., Standard Operating Procedures) to be followed in conducting monthly monitoring of each gas collection well for carbon

monoxide, temperature, oxygen and pressure; (ii) the steps to be followed, including time frames, when a gas collection well exceeds one or more of the parameter limits; (iii) documentation of actions taken to correct parameter exceedances; and (iv) documentation of parameter compliance and/or expansion of gas collection system.

- ii. Improved Surface Emission Monitoring: (i) the affirmative steps (i.e., Standard Operating Procedures) to be followed in conducting quarterly surface emission monitoring; (ii) the steps to be followed, including time frames, when a surface methane emission greater than 500 ppm is detected; (iii) documentation of actions taken to correct surface methane emissions; and (iv) documentation of surface methane emission compliance and/or expansion of gas collection system.
- iii. Improved Surface Integrity Monitoring: (i) the affirmative steps (i.e., Standard Operating Procedures) to be followed in conducting monthly surface integrity monitoring; (ii) the steps to be followed, including time frames, when a surface integrity issue is identified. All identified surface integrity issues are to be clearly documented, including a description of the issue as well as the location on the landfill surface. Iowa City shall also provide documentation of corrective actions taken, if necessary, to repair landfill surface.

These Standard Operating Procedures shall be subject to EPA review and approval procedures as outlined in Paragraph 52 and are intended to ensure compliance with 40 C.F.R. § 60.11(d), 40 C.F.R. § 60.753(a)(1), 40 C.F.R. § 60.755(a)(3), 40 C.F.R. § 60.755(a)(5), and 40 C.F.R. § 60.755(c).

- c. By no later than 90 days from the date of EPA's approval of the document in Paragraph 48.b., Iowa City must complete training of all managers and staff responsible for landfill monitoring activities. The training must cover all elements of the prepared document, including but not limited to those referenced in Paragraph 48.b. In addition, the document must be made available to all staff. Documentation of training, including any training materials (e.g., slides, handouts, manuals, etc.), and training completion, must be submitted to EPA within 60 days of completion of the training.

49. Gas Collection System Audit

- a. By no later than 30 days after the effective date of this Consent Agreement and Final Order, Iowa City shall hire a third party to conduct an evaluation of the Iowa City Sanitary Landfill gas collection system. The third party auditor shall have experience and expertise evaluating the effectiveness and integrity of active landfill gas collection systems and be a recognized expert in the regulations of 40 C.F.R. Part 60, Subpart WWW. The parties agree that Barker Lemar Engineering Consultants, the City's current consultant, may perform the audit provided that a) documentation of its

third party auditor qualifications is provided to EPA for review and approval at least 15 days prior to the audit of the Iowa City Sanitary Landfill gas collection system and b) EPA determines that Barker Lemar Engineering Consultants meet the criteria of paragraph 49.a. The audit shall evaluate the effectiveness of the gas collection system to adequately collect the gas generated in the Iowa City Sanitary Landfill and shall include, but not be limited to, the following:

- i. determine the liquid level in each well;
- ii. evaluate each well for physical damage (subsurface);
- iii. evaluate all wellhead seals, fittings and connections for landfill gas leaks;
- iv. evaluate the landfill surface and gas collection equipment for possible oxygen entry points;
- v. evaluate gas flow rate (at each well as well as the flow entering the flare) and flare capacity; and
- vi. determine if landfill gas is migrating outside any trash containing area of the landfill.

The auditor shall provide recommendations for improving the quantity of gas collected from the Iowa City Landfill, including, but not limited to, improvements to the existing gas collection system and current gas collection system operating procedures.

- b. By no later than 120 days after the effective date of this Consent Agreement and Final Order, Iowa City shall complete the third party audit

of the Iowa City Sanitary Landfill.

- c. By no later than 15 days from completion of the third party audit, Iowa City shall provide EPA with a copy of the audit report. The report shall include, but not be limited to, the auditor's findings, the auditor's recommendations for improving the Iowa City Sanitary Landfill's gas collection system, and a schedule for completion of such recommendations.
- d. By no later than 30 days from EPA's receipt of the audit report, Iowa City shall begin implementation of the auditor's recommendations. If the auditor determines pursuant to Paragraph 49.a.vi. that landfill gas is migrating outside any trash containing area of the landfill, Iowa City shall affirmatively take actions to address the offsite migration. All improvements to the Iowa City Sanitary Landfill shall be completed within 180 days of the completion of the audit. Iowa City shall submit a monthly report to EPA summarizing progress made on the auditor's recommendations.
- e. If Iowa City disagrees with any of the auditor's recommendations, then Iowa City may submit a request to EPA to remove one or more of the auditor's recommendations from consideration under this Order. Such request must be submitted to EPA simultaneously with the audit report. EPA will provide a final decision on Iowa City's request within 30 days of receipt.

50. Documentation of Violation Correction and Continued Compliance. Iowa City shall provide the following documentation for a period of 12 months following the effective date of this Consent Agreement and Final Order to demonstrate correction of the above violations and continued compliance with the monitoring requirements of 40 C.F.R. Part 60, Subpart WWW:

- a. Monthly well monitoring report. Each monthly report shall be submitted to EPA within 30 days of the last day of the month. The monthly report shall contain, at a minimum, the following:
 - i. date of monitoring activities at each well head;
 - ii. documentation of oxygen and carbon monoxide concentration, temperature and pressure at each well head;
 - iii. date and documentation of action taken to correct any deviations of oxygen and carbon monoxide concentration, temperature and/or pressure at each well head;
 - iv. date and documentation of all monitoring activities to determine if deviations have been corrected;
 - v. date and documentation that compliance is achieved at each well head exhibiting an oxygen and carbon monoxide concentration, temperature and/or pressure deviation; and,
 - vi. date and documentation of action taken (i.e. well field expansion) when oxygen and carbon monoxide concentration, temperature and/or pressure deviation is not corrected.
- b. Quarterly surface emission monitoring report. Each quarterly report shall be submitted to EPA within 45 days of surface emission monitoring. The

quarterly report shall contain, at a minimum, the following:

- i. date of surface emission monitoring activity;
 - ii. documentation of surface emission monitoring results, including location and concentration of all surface emissions exceeding 500 ppm methane above background;
 - iii. date and documentation of action taken in response to surface emission exceedances;
 - iv. date and documentation of all monitoring activities conducted to determine if surface emission exceedances have been adequately addressed;
 - v. date and documentation that compliance is achieved at all areas originally exceeding 500 ppm methane above background; and,
 - vi. date and documentation of action taken (i.e. well field expansion) if surface emissions are not reduced to less than 500 ppm methane above background.
- c. All documents required to be submitted to EPA by this Order shall contain the following certification, signed by an officer of Iowa City:

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

The submissions required by the above paragraphs and subparagraphs shall be sent to EPA using the Electronic Portal described in Paragraph 50.d.

- d. Electronic Portal. By no later than sixty (60) days after the Effective Date of this Consent Agreement and Final Order, Respondent shall provide EPA access via an Electronic Portal (Portal) to assist EPA in monitoring compliance with this Consent Agreement and Final Order. All documents, certifications, plans, reports, updates, notices, procedures, or other information (Materials) that are required pursuant to this Consent Agreement and Final Order shall be made available to the EPA via a secure, web-based Portal. The Portal shall be easily navigable, include links to all Materials in electronic format, allow users to save and print Materials, be clearly organized and indexed, and accessible 24 hours per day. All Materials shall remain available through the Portal until termination of this Consent Agreement and Final Order. Respondent may assert that information made available to EPA via the portal is entitled to protection as Confidential Business Information (CBI), using the procedures outlined in 40 C.F.R. Part 2, subpart B.

51. If Respondent is aware of or anticipates a condition at the Iowa City Landfill that may cause off-site migration of uncomfortable odors, Respondent shall provide appropriate and timely notice of that condition to all impacted neighboring communities using a publicly available Internet Website, other social media (e.g., Facebook, Twitter, etc.), toll-free hotline, mailing list, email, newspaper notices, or some other similar method.

52. Review and Approval procedures: EPA will review the documents that are specifically required to be submitted by Respondent pursuant to paragraphs 48.b., 49.a. and 64 of this Consent Agreement and Final Order according to the procedures outlined in this paragraph. EPA will review such document and may approve, approve with modifications, or disapprove and provide comments to Respondent, indicating the requirements of this Consent Agreement and Final Order with which Respondent did not comply. If the document is disapproved with comments, Respondent shall address EPA's comments and resubmit the document within thirty (30) days of receipt of EPA's comments. If Respondent fails to revise the document in accordance with EPA's comments, Respondent shall be subject to the stipulated penalties as set forth in Paragraph 67 below.

53. Respondent agrees that the time period from the Effective Date of this Consent Agreement and Final Order until all of the conditions specified in Paragraphs 48 through 51 are completed (the "Tolling Period") shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by Complainant on any claims (the "Tolled Claims") set forth in Section V of this Consent Agreement and Final Order. Respondent shall not assert, plead, or raise in any fashion, whether by answer, motion or otherwise, any defense of laches, estoppel, or waiver, or other similar equitable defense based on the running of any statute of limitations or the passage of time during the Tolling Period in any action brought on the Tolled Claims.

54. The provisions of this Agreement shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assigns. From the Effective Date of this Agreement until Termination of this Consent Agreement and Final Order, Respondent must give written notice and a copy of this

Agreement to any successors in interest prior to any transfer of ownership or control of any portion of or interest in the Facility. Simultaneously with such notice, Respondent shall provide written notice of such transfer, assignment, or delegation to the EPA. In the event of any such transfer, assignment, or delegation, Respondent shall not be released from the obligations or liabilities of this Agreement unless the EPA has provided written approval of the release of said obligations or liabilities.

55. By signing this Agreement, Respondent acknowledges that this Consent Agreement and Final Order will be available to the public and agrees that this Agreement does not contain any confidential business information or personally identifiable information.

56. Respondent shall require that all contractors, employees, consultants, firms or other persons or entities acting for Respondents with respect to matters included herein comply with the terms of this Consent Agreement and Final Order.

57. By signing this Consent Agreement, the undersigned representative of Complainant and the undersigned representative of Respondent each certify 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 it.

58. By signing this Consent Agreement, both parties agree that each party's obligations under this Consent Agreement and attached Final Order constitute sufficient consideration for the other party's obligations. Additionally, both parties agree that Complainant's covenant not to sue Respondent (stated in Paragraph 75) during the time period between the issuance of this Consent Agreement and Final Order and the deadline (stated in Paragraphs 48 through 51) for Respondent to complete the non-penalty conditions of this Consent Agreement constitutes sufficient consideration for Respondent's obligation to

completely perform the non-penalty conditions of this Consent Agreement as stated in Paragraphs 48 through 51, regardless of whether the covenant not to sue subsequently terminates.

59. By signing this Consent Agreement, Respondent certifies that the information it has supplied concerning this matter was at the time of submission true, accurate, and complete for each such submission, response, and statement. Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.

60. Each party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.

C. Supplemental Environmental Project

61. In settlement of the violations alleged in Section V of this Consent Agreement and Final Order, Respondent shall complete the SEP described in this Consent Agreement and Final Order, which the parties agree is intended to secure significant environmental or public health protection and improvement.

62. Respondent shall purchase and install four cameras and associated equipment (e.g., communication lines, monitoring software, etc.) at the Iowa City Landfill to monitor both the active portion of the landfill as well as waste collection vehicles entering the landfill. These cameras shall be equipped with thermal imaging capability to monitor both surface and subsurface temperatures. Furthermore, these cameras shall be connected to an early warning system which will send alarms to designated staff when detected temperatures reach a level that signifies a landfill fire or otherwise indicates a potential for chemical reactions that could result in a landfill fire.

63. Respondent shall create and implement a landfill fire risk management plan to provide pre-emergency event planning, coordination and on-site training to Iowa City Landfill staff, management, and emergency personnel (e.g., local fire and police department, county Emergency Management Authority, etc.) who would respond in the event of a fire within the landfill property. Such training shall include, but not be limited to, the following topics: landfill characteristics and infrastructure; landfill fire characteristics, causes and detection methods; environmental monitoring practices that can be used to protect landfill staff and emergency personnel while they are mitigating a fire event; and methods to extinguish surface and subsurface landfill fires. This plan shall be periodically updated by Respondent as conditions at the landfill and/or landfill regulations change.

64. SEP Completion Report: Within 30 days of completion of the SEP, Respondent shall submit a SEP Completion Report to the EPA contact identified in Paragraph 64.d. The SEP Completion Report shall be subject to EPA review and approval as provided in Paragraph 52. The SEP Completion Report shall conform to the requirements of this Consent Agreement and Final Order.

- a. In itemizing its costs in the SEP Completion Report, Respondent shall clearly identify and provide acceptable documentation for all SEP Costs. SEP Costs shall not include Respondent's internal expenses such as overhead; internal employee time, salary or overtime; administrative expenses; legal fees; and contractor oversight related to performance of the SEP. For purposes of this Paragraph, "acceptable documentation" includes invoices, purchase orders, or other documentation that specifically identifies and itemizes the individual costs of the goods and/or

services for which payment is being made. Cancelled drafts do not constitute acceptable documentation unless such drafts specifically identify and itemize the individual costs of the goods and/or services for which payment is being made.

- b. Respondent shall certify the truth and accuracy of each of the following in the SEP Completion Report:
 - i. That all cost information provided to the EPA in connection with the EPA's approval of the SEP is complete and accurate;
 - ii. That the SEP is not a project that Respondent was planning or intending to construct, perform, or implement other than in settlement of the claims resolved in this Consent Agreement and Final Order;
 - iii. That Respondent has not received and will not receive credit for the SEP in any other enforcement action;
 - iv. That Respondent will not receive reimbursement for any portion of the SEP from another person or entity;
 - v. That for federal income tax purposes, Respondent agrees that it will neither capitalize into inventory or basis nor deduct any costs or expenditures incurred in performing the SEP; and
 - vi. That Respondent is not a party to any open federal financial assistance transaction that is funding or could fund the same activity as the SEP.
- c. The SEP Completion Report shall include the statement of Respondent,

through an officer, signed and certifying under penalty of law the following:

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

- d. The SEP Completion Report shall be submitted to:

Gary Bertram
AWMD/APCO/ACES
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

65. Any public statement, oral or written, in print, film, internet, or other media, made by Respondent making reference to the SEP shall include the following language

This project was undertaken in connection with the settlement of an enforcement action taken by the U.S. Environmental Protection Agency for alleged violations of the Clean Air Act. 42 U.S.C. § 7401 et. seq.

66. Respondent hereby certifies that, as of the date of this Consent Agreement and Final Order, Respondent is not required to perform or develop the SEP described in this Consent Agreement and Final Order by any federal, state, or local law or regulation; nor is Respondent required to perform or develop the SEP by any other agreement, grant or as injunctive relief in this or any other case, and is not presently negotiating to receive credit for the SEP in any other case.

D. Stipulated Penalties

67. Respondent shall be liable for stipulated penalties to the United States in the amounts set forth below for failure to comply with the requirements of Paragraphs 48 through 51 of this Consent Agreement. The following stipulated penalties shall accrue per violation per day:

- a. For failure to comply with any requirement (excluding submittal of any required report to EPA) of Paragraphs 48 through 51:

Penalty Per Violation Per Day	Period of Non Compliance
\$400	1 st through 15 th day
\$800	15 th day and beyond

- b. For failure to submit any report or documentation as required by Paragraphs 48 through 51:

Penalty Per Violation Per Day	Period of Non Compliance
\$250	1 st through 30 th day
\$500	31 st day and beyond

68. For failure to comply with the requirements of the SEP, the following stipulated penalties shall accrue as set forth below:

- a. If the SEP is not completed satisfactorily and timely pursuant to the requirements set forth in this Consent Agreement and Final Order, Respondent shall be liable for and shall pay a stipulated penalty to the United States as follows:

- i. For failure to complete the SEP within one year following entry of this Consent Agreement and Final Order:

Penalty Per Violation Per Day	Period of Non Compliance
\$250	1 st through 30 th day
\$500	31 st day and beyond

- ii. If Respondent spends at least \$100,000, but less than \$109,092 in SEP Costs (as defined in paragraph 64.a): The difference between \$109,092 and the amount of SEP Costs spent by Respondent (Minor Shortfall), plus an amount equal to 10% of the Minor Shortfall.
 - iii. For failure to spend at least \$100,000 in SEP Costs (as defined in paragraph 64.a): The difference between \$109,092 and the amount of SEP Costs spent by Respondent (Substantial Shortfall) plus an amount equal to 25% of the Substantial Shortfall.
- b. If Respondent fails to timely and completely submit the SEP Completion Report required by this Consent Agreement and Final Order, Respondent shall be liable for and shall pay the following stipulated penalty:

Penalty Per Violation Per Day	Period of Non Compliance
\$250	1 st through 30 th day
\$500	31 st day and beyond

69. EPA shall in its reasonable judgment determine whether the SEP has been satisfactorily completed and whether Respondent has made a good faith, timely effort to implement the SEP.

70. All penalties shall begin to accrue on the day after the complete performance is due or the day a violation occurs, and shall continue to accrue through the final day of the correction of the noncompliance or completion of the activity. Nothing herein shall prevent the simultaneous accrual of separate penalties for separate violations of this Consent Agreement and Final Order.

71. The payment of stipulated penalties under this Consent Agreement and Final Order shall not alter in any way Respondent's obligations to comply with the provisions of this Consent Agreement and Final Order.

72. Respondent shall pay stipulated penalties not more than fifteen (15) days after receipt of written demand by EPA for such penalties. Method of payment shall be in accordance with the provisions set forth in Paragraph 45 of this Agreement.

73. The stipulated penalties provided for in this Consent Agreement shall be in addition to any other rights, remedies, or sanctions available to the EPA for Respondent's violation of this Consent Agreement and Final Order or applicable law. Where a violation of this Consent Agreement and Final Order is also a violation of statutory or regulatory requirements, Respondent shall be allowed a credit, for any stipulated penalties paid, against any statutory penalties imposed for such violation.

E. Effect of Consent Agreement and Final Order

74. In accordance with 40 C.F.R. § 22.18(c), completion of the terms of this Consent Agreement and Final Order resolves only Respondent's liability for federal civil penalties for the violations and facts specifically alleged above.

75. Complainant covenants not to sue Respondent for injunctive or other equitable relief for the violations and facts alleged in this matter, but such covenant automatically terminates if and when Respondent fails to timely and satisfactorily complete every condition stated in Paragraphs 48 through 51 (including payment of any stipulated penalties owed). If and when such covenant terminates, the United States at its election may seek to compel performance of the conditions stated in Paragraphs 48 through 51 in a civil judicial action under the CAA or

as a matter of contract. The covenant not to sue becomes permanent upon satisfactory performance of the conditions stated in Paragraphs 48 through 51.

76. Penalties paid pursuant to this Consent Agreement and Final Order shall not be deductible for purposes of federal taxes.

77. This Consent Agreement and Final Order constitutes the entire agreement and understanding of the parties and supersedes any prior agreements or understandings, whether written or oral, among the parties with respect to the subject matter hereof.

78. The terms, conditions, and compliance requirements of this Consent Agreement and Final Order may not be modified or amended except upon the written agreement of both parties, and approval of the Regional Judicial Officer.

79. Any violation of this Consent Agreement and Final Order may result in a civil judicial action for an injunction or civil penalties of up to \$37,500 per day per violation, or both, as provided in Section 113(b)(2) of the Act, 42 U.S.C. § 7413(b)(2), as well as criminal sanctions as provided in Section 113(c) of the Act, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this Consent Agreement and Final Order in an administrative, civil judicial, or criminal action.

80. Nothing in this Consent Agreement and Final Order shall relieve Respondent of the duty to comply with all applicable provisions of the Act and other federal, state, or local laws or statutes, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations in a manner consistent with this Consent Agreement and Final Order, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit.

81. Nothing herein shall be construed to limit the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.

82. This Consent Agreement and Final Order shall automatically terminate upon the latest date of the following events: (a) payment by Respondent of the EPA Penalty described in Paragraph 44; (b) completion by Respondent of the Conditions described in Paragraphs 48 through 51; and (c) payment by Respondent of all stipulated penalties in accordance with Paragraphs 67 and 68. Upon termination EPA shall provide written notice to Respondent acknowledging that the Consent Agreement has terminated.

83. Respondent shall comply with all terms of the Consent Agreement and Final Order. The terms of this Consent Agreement and Final Order shall apply to and be binding upon Complainant and Respondent, and Respondent's agents, successors and/or assigns. Respondent shall take steps to require 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.

F. EFFECTIVE DATE

84. Respondent and Complainant agree to issuance of the attached Final Order. Upon filing, the EPA will transmit a copy of the filed Consent Agreement to the Respondent. This Consent Agreement and attached Final Order shall become effective after execution of the Final Order by the Regional Judicial Officer, on the date of filing with the Hearing Clerk.

The foregoing Consent Agreement In the Matter of Iowa City, Iowa Landfill, Docket No. CAA-07-2016-0027, is hereby Stipulated, Agreed, and Approved for Entry

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

6/14/16
Date

Becky Weber
Becky Weber
Director, Air and Waste Management
Division
U.S. Environmental Protection Agency
Region 7

June 13, 2016
Date

Alex Chen
Alex Chen
Senior Counsel
U.S. Environmental Protection Agency
Region 7

The foregoing Consent Agreement In the Matter of Iowa City, Iowa Landfill, Docket No.
CAA-07-2016-0027, is hereby Stipulated, Agreed, and Approved for Entry

**FOR RESPONDENT:
IOWA CITY, IOWA**

June 6, 2016

Date



Signature

James A. Throgmorton
Printed Name

Mayor
Title

410 E. Washington St, Iowa City IA 52240
Address

42-6004805
Respondent's Federal Tax ID Number


Attest

Approved By

 6-1-16

City Attorney's Office

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219

IN THE MATTER OF:

Iowa City, Iowa Sanitary Landfill
3900 Hebl Avenue
Iowa City, Iowa

CONSENT AGREEMENT AND FINAL
ORDER
CAA Docket No: 07-2016-0027

Pursuant to 40 C.F.R. § 22.18(b) of the EPA's Consolidated Rules of Practice and section 113(d) of the Clean Air Act, 42 U.S.C. § 7413(d), the attached Consent Agreement resolving this matter is incorporated by reference into this Final Order and is hereby ratified.

The Respondent is ORDERED to comply with all terms of the Consent Agreement, effective immediately.

So ordered.

June 20, 2016

Date

Karina Borromeo

Karina Borromeo
Regional Judicial Officer

IN THE MATTER Of Iowa City, Iowa Sanitary Landfill, Respondent
Docket No. CAA-07-2016-0027

CERTIFICATE OF SERVICE

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

Copy emailed to Attorney for Complainant:

chen.alex@epa.gov

Copy by First Class Mail to Respondent:

Chris O'Brien
City of Iowa City
410 East Washington Street
Iowa City, Iowa 52240-1826

Eleanor M Dilkes, Esq
City Attorney
City of Iowa City
410 E Washington Street
Iowa City, Iowa 52240

Dated: 10/20/16



Kathy Robinson
Hearing Clerk, Region 7