



REGION 9

SAN FRANCISCO, CA 94105

Sent Via Email:

RETURN RECEIPT REQUESTED

Veeken H. Tashjian
President
Pacific Resource Recovery Services
3150 E Pico Blvd.
Los Angeles, CA 90023

Re: EXPEDITED SETTLEMENT OPPORTUNITY
Notice of Investigation Results under the Resource Conservation and Recovery Act
Pacific Resource Recovery Services
EPA ID Number: CAD008252405
Docket Number: RCRA-09-2025-0103

Dear Veeken H. Tashjian,

Representatives from the U.S. Environmental Protection Agency (“EPA”), Region 9, have identified a potential violation of the Resource Conservation and Recovery Act (“RCRA”) (42 U.S.C. § 6901 *et seq.*) and the authorized California hazardous waste management program at Pacific Resource Recovery Services (PRRS), located at 3150 E Pico Blvd.

By this letter, EPA is providing you with an opportunity to quickly resolve the violations by entering into an Expedited Settlement Agreement. EPA has authority to pursue civil penalties for the violations of RCRA requirements, including violations that are easily identifiable and easily correctable, such as the violations cited below. You may resolve the alleged violation by correcting the violations cited below, paying the specified penalty, and signing and returning the enclosed Expedited Settlement Agreement within 30 days of your receipt of this letter.

If you dispute this violation, please provide a written explanation, along with any documentation to Daniel Fernandez at the address below within 30 days of your receipt of this letter.

As a result of the EPA file review of your facility, Pacific Resource Recovery Services failed to comply with the following RCRA regulation:

- Failure to provide RCRA training to employees conducting HW container inspections on the weekends. [Cal. Code Regs. Tit. 22, §66264.16(a) & 40 CFR Part 264.16(a)(1)].

- Failure to provide annual refresher training to employees primarily responsible for conducting RCRA Subpart-BB leak detection monitoring [Cal. Code Regs. Tit. 22, §66264.16(c) & 40 CFR Part 264.16(c)].
- Failure to list all the equipment subject to RCRA Subpart BB in the facility operating record [Cal. Code Regs. Tit. 22, §66264.1064(b)(1) & 40 CFR Part 264.1064(b)(1)].

Opportunity for Expedited Settlement

Under the authority of Section 3008 of RCRA, 42 U.S.C. 6928, EPA may pursue civil penalties of up to \$93,058 per day for each violation of Subtitle C of RCRA, including violations of approved and authorized State program requirements.

However, EPA is offering to resolve the violations described above with an Expedited Settlement Agreement (Agreement), which provides you the opportunity to quickly resolve the violations with payment of a substantially reduced penalty. If you choose to sign the Agreement and EPA determines you have satisfied the requirements for expedited settlement described below, then EPA will settle the violations listed above for **\$3,750**.

Procedure for Expedited Settlement

To take advantage of the Expedited Settlement offer, within 30 days of your receipt of this letter, you must:

- (1) Correct the outstanding violations. This must be documented on the enclosed document titled "Injunctive Relief Worksheet."
- (2) Complete and return to EPA the enclosed Agreement. By signing the Agreement, you are certifying that you: (a) have corrected the violations; (b) have submitted true and accurate documentation of compliance; and (c) paid the civil penalty of **\$3,750**. Also, by signing the Agreement, you agree to waive your opportunity for a hearing or appeal concerning the violations.

Pay the assessed penalty of Three Thousand Seven Hundred and Fifty Dollars (**\$3,750**). Instructions for payment of the penalty can be found at: <https://www.epa.gov/financial/makepayment>.

Within 24 hours of payment, please email a PDF copy of the signed Agreement and proof of payment (e.g., a copy of the check, digital payment receipt or a statement of affirmation regarding electronic funds transfer), including Respondent's name, complete address, and docket number to the below-listed EPA contacts.

Regional Hearing Clerk
U.S. Environmental Protection Agency
R9HearingClerk@epa.gov

and

Daniel Fernandez
Environmental Scientist
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California, 94105
fernandez.daniel@epa.gov

If you can demonstrate, in writing, that it is technically infeasible or impracticable to correct your RCRA violations then within thirty days, upon request, EPA, at its discretion, may grant an extension. Extension requests and the above demonstration must be made in writing no later than ten days before the end of the initial 30-day compliance period. The request must clearly indicate whether you intend to take advantage of the expedited settlement agreement. Any extensions must be granted in writing by EPA.

If you do not follow the procedures outlined in this letter for expedited settlement within 30 days of receipt of this letter, then this settlement offer will be automatically withdrawn, without prejudice to the EPA's ability to file a complaint for the cited violations. EPA may seek penalties of up to \$93,058 per day for the violations cited above.

We are committed to the fair and rapid settlement of this matter. If you have any questions or wish to discuss the general circumstances of your case, please contact Daniel Fernandez of my staff at fernandez.daniel@epa.gov or (415) 972-3299.

Sincerely,

Amy C. Miller-Bowen, Director
Enforcement and Compliance Assurance Division
U.S. EPA Region 9

Cc:

Kristine Green, California Department of Toxic Substances Control, kristine.schaefergreen@dtsc.ca.gov
Leslie Johnson, California Department of Toxic Substances Control, leslie.johnson@dtsc.ca.gov
April Ranney, California Department of Toxic Substances Control, april.ranney@dtsc.ca.gov

Attachments:

- 1) ESA Offer
- 2) Injunctive Relief Worksheet