

SUZANNE ANDREWS  
Regional Counsel  
United States Environmental Protection Agency, Region 9

DAVID H. KIM  
Assistant Regional Counsel  
United States Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, California 94105  
(415) 972-3882

Attorneys for Complainant



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 9  
75 HAWTHORNE STREET  
SAN FRANCISCO, CALIFORNIA 94105

In the Matter of:	)	Docket No. RCRA-09-2025-0113
	)	
Unitek Solvent Services, Inc.	)	COMPLAINT AND NOTICE OF
	)	OPPORTUNITY FOR HEARING
	)	
Respondent	)	
	)	

## I. COMPLAINT

### A. INTRODUCTION

1. This is a civil administrative enforcement action instituted pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. § 6928(a)(1), 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 ("Consolidated Rules"). 40 C.F.R. § 22.13(a).

2. The Administrator of the U.S. Environmental Protection Agency (“EPA”) has duly delegated authority to issue complaints under Section 3008 of RCRA, 42 U.S.C. § 6928, to the EPA Regional Administrators. The Regional Administrator, EPA Region 9, in turn, re delegated that authority to Amy Miller-Bowen, Director, Enforcement and Compliance Assurance Division, EPA Region 9, who is the Complainant in this matter. *See* Delegation R9-8-9-A, last revised January 22, 2016.
3. Respondent in this matter is Unitek Solvent Services, Inc., a Hawaii Corporation (“Unitek” or “Respondent”).

#### B. JURISDICTION AND GOVERNING LAW

4. Subtitle C of RCRA requires the EPA Administrator to promulgate regulations establishing a hazardous waste management program. Section 3006 of RCRA, 42 U.S.C. § 6926, provides, *inter alia*, that authorized state hazardous waste management programs are carried out under Subtitle C of RCRA. Therefore, a violation of any requirement of law under an authorized state hazardous waste program is a violation of a requirement of Subtitle C of RCRA.
5. On November 13, 2001, the State of Hawaii (“State”) received authorization to administer the hazardous waste management program in lieu of the federal program pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, and 40 C.F.R. Part 271. The authorized program is established pursuant to Hawaii Revised Statutes (“H.R.S.”) Chapter 342, and the regulations promulgated thereunder at Hawaii Administrative

Rules (“H.A.R.”), Title 11, Chapters 11-260 through 11- 279. The State of Hawaii has been authorized for all the regulations referenced in this Complaint.

6. Although EPA has granted the State of Hawaii authority to enforce its own hazardous waste program, EPA retains jurisdiction and authority to initiate an independent enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, which authorizes the EPA Administrator to issue orders assessing a civil penalty and/or requiring compliance immediately or within a specified time for violation of any requirement of Subtitle C of RCRA, Section 3001 of RCRA *et seq.*, 42 U.S.C. §§ 6921 *et seq.*

#### C. GENERAL ALLEGATIONS

7. Respondent owns and operates a facility located at 91-125 Kaomi Loop, Kapolei, Hawaii (the “Facility”).
8. On May 10-11, 2022, EPA conducted a compliance evaluation inspection (the “Inspection”) at the Facility.
9. Respondent provides a variety of waste-related services to commercial and industrial customers including: collection of oily waste and waste antifreeze; collection of waste tires; cleaning of petroleum sump pumps; and generation and distribution of EcoDiesel.
10. Respondent leases parts washers to various industrial customers for cleaning parts or equipment that are coated with oil, solvents, or dirt during normal operations. Under service contracts with these customers, Respondent collects spent solvents (the

“Solvents”) from the customers, transports them to the Facility where Respondent reclaims the solvents and resupplies customers with clean solvents.

11. Respondent stores the Solvents in Tanks 21 and 22 at the Facility, with each tank capable of storing up to 3,500 gallons.
12. Respondent stores reclaimed solvents in Tank 23 at the Facility before distributing them to customers. Respondent stores still bottoms resulting from the reclamation of spent solvents in Tank 25 at the Facility for up to three years before disposing of them off-site.
13. During the Inspection, EPA sampled the Solvents and subsequently determined that the Solvents were hazardous wastes due to its ignitability characteristics (waste code D001) and toxicity characteristics (D018).
14. At all times relevant to this CAFO, Respondent operated the Facility subject to Chapter 342 of H.R.S. and the regulations promulgated thereunder, H.A.R., Title 11, Chapters 11-260 through 11-279.
15. The Solvents are “hazardous wastes” as defined in H.A.R. § 11-260.1-1 [*see also* 40 C.F.R. § 260.10]<sup>1</sup>.
16. The Solvents are “hazardous secondary materials” as defined in H.A.R. § 11-260.1-1 [*see also* 40 C.F.R. § 260.10].
17. Respondent is a “person” as defined in H.A.R. § 11-260.1-1 [*see also* 40 C.F.R. § 260.10].
18. Respondent is the “owner” of a facility as defined in H.A.R. § 11-260.1-1 [*see also* 40 C.F.R. § 260.10].

---

<sup>1</sup> EPA is enforcing Hawaii hazardous waste management program requirements as approved and authorized by the United States. As a convenience, corresponding Federal citations are provided in brackets.

19. Respondent is the “operator” of a facility as defined in H.A.R. § 11-260.1-1 [*see also* 40 C.F.R. § 260.10].
20. Respondent is a “generator” of hazardous wastes as defined in H.A.R. § 11-260.1-1 [*see also* 40 C.F.R. § 260.10].
21. Respondent is a “transporter” of hazardous wastes as defined in H.A.R. § 11-260.1-1 [*see also* 40 C.F.R. § 260.10].
22. At the Facility, Respondent is or has been engaged in “treatment,” “storage,” or “disposal” of “hazardous waste” as defined in H.A.R. § 11-260.1-1 and H.A.R. § 11-261.1-1. [*see also* 40 C.F.R. §§ 260.10 and 261.3]. These hazardous wastes include but are not limited to the following hazardous waste codes: D001 and D018.

#### D. ALLEGED VIOLATIONS OF LAW

##### COUNT ONE

Failure to Submit Notification to EPA prior to Managing Hazardous Secondary Materials  
(H.A.R. § 11-260.1-1)

23. Paragraphs 1 through 22 above are incorporated herein by this reference as if they were set forth here in their entirety.
24. H.A.R. § 11-260.1-1 requires that a person who manages hazardous secondary materials under benefit of the exemption set forth at 40 C.F.R. § 261.4(a)(24) must send a notification consistent with 40 C.F.R. § 260.42, which requires notice to EPA prior to operating under the regulatory provision and by March 1 of each even-numbered year thereafter to the Regional Administrator of EPA using EPA Form 8700-12. [*see also* 40 C.F.R. § 260.42].

25. During 2020-2022, Respondent managed the Solvents at the Facility pursuant to the exemption set forth at 40 C.F.R. § 261.4(a)(24).
26. Respondent failed to send a notification to EPA using EPA Form 8700-12 prior to managing the Solvents as hazardous secondary materials under 40 C.F.R. § 261.4(a)(24).
27. Respondent failed to submit notification to EPA prior to managing hazardous secondary materials, in violation of H.A.R. § 11-260.1-1. [*see also* 40 C.F.R. § 260.42].
28. Respondent's failure to submit notification to EPA prior to managing hazardous secondary materials is a major violation that essentially undermines EPA's ability to oversee Respondent's compliance with the regulatory scheme under RCRA and the long-term management of hazardous wastes throughout its jurisdiction.

#### COUNT TWO

##### Failure to Perform a Waste Determination (H.A.R. § 11-262.1-1)

29. Paragraphs 1 through 22 above are incorporated herein by this reference as if they were set forth here in their entirety.
30. H.A.R. § 11-262.1-1 requires that a person who generates a waste shall make an accurate determination of whether that waste is a hazardous waste at the point of generation by methods set forth in subparagraphs (a) through (d), including listing as a hazardous waste, identification of any characteristics of hazardous waste, exclusions, or testing. An accurate determination must also be made at any time in the course of management of any waste that has, or may have, changed its properties. [*See also* 40 C.F.R. § 262.11].

31. During 2020-2022, Respondent collected certain Solvents from customers Waipahu Repair and HECO, transported those Solvents to the Facility, and stored those Solvents in Tank 22 before they were reclaimed.
32. The Inspection and review of the Facility records indicated that Respondent failed to perform a waste determination of Tank 22 after introduction of the Solvents during 2020-2022, which changed or may have changed the waste's properties.
33. Respondent failed to perform an accurate determination of waste, in violation of H.A.R. § 262.1-1. [*see also* 40 C.F.R. § 262.11].
34. Respondent's failure to perform an accurate determination of waste is a major violation that essentially undermines Respondent's management of hazardous wastes and risks exposure and damage to human health and the environment.

### COUNT THREE

#### Failure to Comply with the Manifest Requirements for Hazardous Wastes (H.A.R. § 11-263.1-1)

35. Paragraphs 1 through 22 above are incorporated herein by this reference as if they were set forth here in their entirety.
36. Under H.A.R. § 11-263.1-1, a transporter may not accept hazardous waste from a generator unless the transporter is provided with a manifest form that complies with the requirements of 40 C.F.R. § 262.23. [*see also* 40 C.F.R. § 263.20(a)(1)].
37. The Inspection and review of the Facility records indicated that Respondent transported the Solvents from Waipahu Repair and HECO to the Facility during 2020 through 2022 without receiving manifests for hazardous wastes.

38. Respondent failed to comply with the manifest requirements for hazardous wastes, in violation of H.A.R. § 11-263.1-1. [*see also* 40 C.F.R. § 263.20(a)(1)].
39. Respondent's failure to comply with the manifest requirements for hazardous wastes is a major violation that essentially undermines Respondent's management of hazardous wastes, risks exposure and damage to human health and the environment, and undermines EPA's ability to oversee the long-term management of hazardous wastes throughout its jurisdiction.

#### COUNT FOUR

##### Storage of Hazardous Waste without a Permit (H.A.R. § 11-270.1-1)

40. Paragraphs 1 through 22 above are incorporated herein by this reference as if they were set forth here in their entirety.
41. H.A.R. § 11-270.1-1 requires a permit for the transfer, treatment, storage, and disposal of any hazardous waste. [*see also* 40 C.F.R. § 270.1(c)].
42. The Inspection and review of the Facility records indicated that Respondent stored the Solvents in Tank 22 at the Facility during 2020-2022.
43. Respondent failed to obtain any permits before storing the Solvents in Tanks 22 at the Facility during 2020-2022.
44. Respondent failed to obtain a permit for storage of hazardous waste, in violation of H.A.R. § 11-270.1-1. [*see also* 40 C.F.R. § 270.1(c)].
45. Respondent's failure to obtain a permit for storage of hazardous waste is a major violation that essentially undermines Respondent's management of hazardous wastes, risks exposure and damage to human health and the environment, and undermines



EPA's ability to oversee the long-term management of hazardous wastes throughout its jurisdiction.

COUNT FIVE

Failure to Install and Operate a Leak Detection System for Tanks  
Treating or Storing Hazardous Waste  
(H.A.R. § 11-265.1-1)

46. Paragraphs 1 through 22 above are incorporated herein by this reference as if they were set forth here in their entirety.
47. H.A.R. § 11-265.1-1 requires an owner or operator of a facility that treats, stores, or disposes of hazardous waste in tanks to install a leak detection system that is designed and operated so that it will detect the failure of either the primary and secondary containment structure or any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours. [*see also* 40 C.F.R. § 265.193(c)(3)].
48. The Inspection and review of the Facility records indicated that Respondent failed to install and operate a leak detection system for Tank 22 at the Facility during 2020-2022.
49. Respondent failed to install and operate a leak detection system for hazardous waste tanks, in violation of H.A.R. § 11-265.1-1. [*see also* 40 C.F.R. § 265.193(c)(3)].
50. Respondent's failure to install and operate a leak detection system for hazardous waste is a major violation that essentially undermines Respondent's management of hazardous wastes and risks exposure and damage to human health and the environment.

#### COUNT SIX

##### Failure to Document Daily Inspections of Tanks Treating or Storing Hazardous Waste (H.A.R. § 11-265.1-1)

51. Paragraphs 1 through 22 above are incorporated herein by this reference as if they were set forth here in their entirety.
52. H.A.R. § 11-265.1-1 requires an owner or operator of a facility that treats, stores, or disposes of hazardous waste in tanks to inspect the tanks at least once each operating day and maintain documentation of such inspections. [*see also* 40 C.F.R. § 265.195(g)].
53. The Inspection and review of the Facility records indicated that Respondent failed to document daily inspections of Tank 22 at the Facility during 2020-2022.
54. Respondent failed to document daily inspections of tanks treating or storing hazardous waste, in violation of H.A.R. § 11-265.1-1. [*see also* 40 C.F.R. § 265.195(g)].
55. Respondent's failure to document daily inspections of tanks treating or storing hazardous waste is a major violation that essentially undermines Respondent's management of hazardous wastes and risks exposure and damage to human health and the environment.

#### COUNT SEVEN

##### Failure to Determine Whether Equipment Contains or Contacts a Hazardous Waste with Organic Concentration that Equals or Exceeds 10% by Weight (H.A.R. § 11-265.1-1)

56. Paragraphs 1 through 22 above are incorporated herein by this reference as if they were set forth here in their entirety.
57. H.A.R. § 11-265.1-1 requires owners or operators of a facility to determine, for each piece of equipment, whether the equipment contains or contacts a hazardous waste

with organic concentration that equals or exceeds 10 percent by weight. If the equipment contains or contacts a hazardous waste with organic concentration equaling or exceeding 10 percent by weight, it is subject to air emission standards for equipment leaks set forth at 40 C.F.R. Part 265, Subpart BB, as incorporated by the Hawaii regulations. [see also 40 C.F.R. § 265.1063(d)].

58. Based upon the Inspection and review of the Facility records, EPA determined that Respondent failed to determine whether Tank 22 and associated piping contained or contacted a hazardous waste with organic concentration that equals or exceeds 10 percent by weight during 2020-2022.
59. Respondent failed to determine, for each piece of equipment, whether the equipment contains or contacts a hazardous waste with organic concentration that equals or exceeds 10 percent by weight during 2020-2022, in violation of H.A.R. § 11-265.1-1. [see also 40 C.F.R. § 265.1063(d)].
60. Respondent's failure to determine, for each piece of equipment, whether the equipment contains or contacts a hazardous waste with organic concentration that equals or exceeds 10 percent by weight during 2020-2022 is a major violation that essentially undermines Respondent's management of hazardous wastes and risks exposure and damage to human health and the environment.

#### COUNT EIGHT

##### Failure to Determine Average Volatile Organic Concentration of a Hazardous Waste (H.A.R. § 11-265.1-1)

61. Paragraphs 1 through 22 above are incorporated herein by this reference as if they were set forth here in their entirety.

62. H.A.R. § 11-265.1-1 requires owners or operators of hazardous tank systems to determine the average volatile organic concentration of a hazardous waste at the point of waste generation and before its introduction into such tank systems. [see also 40 C.F.R. § 265.1084]. The measured average volatile organic concentration of a hazardous waste determines the applicability of air emission standards for tanks, surface impoundments, and containers storing hazardous waste set forth at 40 C.F.R. Part 265, Subpart CC, as incorporated by the Hawaii regulations.
63. Based upon the Inspection and review of the Facility records, EPA determined that Respondent failed to determine the average volatile organic concentration of the Solvents before storing them in Tank 22 during 2020-2022.
64. Respondent failed to determine the average volatile organic concentration of a hazardous waste before its introduction into a hazardous waste tank system, in violation of H.A.R. § 11-265.1-1. [see also 40 C.F.R. § 265.1084].
65. Respondent's failure to determine the average volatile organic concentration of a hazardous waste before its introduction into a hazardous waste tank system is a major violation that essentially undermines Respondent's management of hazardous wastes and risks exposure and damage to human health and the environment.

#### E. CIVIL PENALTY

66. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), as adjusted by the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, 28 U.S.C. § 2461, the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, and the Civil Monetary Penalty Inflation Adjustment Rule (90 Fed. Reg. 1375 (Jan. 8, 2025)), authorizes a civil penalty of

up to \$93,058 per day for violations of Subtitle C of RCRA, 42 U.S.C. §§ 6921 *et seq.*, occurring after November 2, 2015.

67. Complainant seeks an administrative penalty against Respondent for Counts One through Eight of the Alleged Violations of Law. Counts One through Eight constitute eight violations of RCRA subject to administrative penalty independent of any other penalty.
68. Complainant makes no specific penalty demand in this Complaint, as authorized by 40 C.F.R. § 22.14(a)(4)(ii), but has alleged facts sufficient to support determination of a penalty consistent with 42 U.S.C. § 6928(a) and (g). The violations alleged in Paragraphs 23 through 65 represent significant violations of RCRA because they significantly undermine the ability of the Respondent to properly manage hazardous wastes to prevent exposure and potential damage to human health and the environment, creating a significant potential for harm.
69. Complainant reserves its right to seek the maximum civil penalty authorized by RCRA. In determining the amount of the civil penalty in this matter, RCRA requires that EPA take into account certain penalty factors, namely “the seriousness of the violation and any good faith efforts to comply with applicable requirements.” RCRA § 3008(a)(3), 42 U.S.C. § 6928(a)(3).
70. Complainant proposes to account for RCRA’s penalty factors by using EPA’s RCRA Civil Penalty Policy (June 2003) (the “Penalty Policy”), available at the following electronic address:

<https://www.epa.gov/sites/default/files/2020-05/documents/june2003rcracivilpenaltypolicyamended050620.pdf>

## II. NOTICE OF RIGHT TO REQUEST A HEARING

### A. PUBLIC HEARING

71. If Respondent contests material facts upon which this Complaint is based, contends that a civil penalty is inappropriate, or contends that Respondent is entitled to judgment as a matter of law, then Respondent must file an original and one copy of a written Answer that conforms to 40 C.F.R. § 22.15 within 30 days after receiving this Complaint.
72. Respondent may file an Answer by any method permitted by the Consolidated Rules and the Office of Administrative Law Judges. *See* EPA Office of Administrative Law Judges, *EPA Office of Administrative Law Judges Practice Manual* 9-10, 13-14 (July 2011), available at <http://www.epa.gov/oalj/orders/alj-practice-manual.pdf>; *see also* EPA Office of Administrative Law Judges, *Notice of Changes of Address*, available at [http://www.epa.gov/oalj/orders/MoveNotice\\_3\\_8\\_13.pdf](http://www.epa.gov/oalj/orders/MoveNotice_3_8_13.pdf). Filing options include mail, commercial delivery, overnight mail, or hand delivery, to the following addresses:
- If filing by UPS, FedEx, DHL, or other courier, or personal delivery, address to:

U.S. Environmental Protection Agency, Region 9  
Regional Hearing Clerk  
Room 12-379  
75 Hawthorne Street  
San Francisco, CA 94105

If filing by the United States Postal Service, address to:

U.S. Environmental Protection Agency, Region 9  
Regional Hearing Clerk  
Mail Code ORC-1  
75 Hawthorne Street

San Francisco, CA 94105

73. Respondent must also send a copy of the Answer to the EPA attorney assigned to this matter, David H. Kim. The Answer shall be served personally, by United States Postal Service ("USPS") mail (including certified mail, return receipt requested; Express mail; and Priority Mail), or by any reliable commercial delivery service. 40 C.F.R. § 22.5(b)(2).

If using USPS mail (except Express Mail), Respondent must use the following address:

David H. Kim  
Mail Code ORC-3  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

If using Express Mail, Respondent must use the following address:

David H. Kim  
Office of Regional Counsel, Room 12132  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

74. The Answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint with regard to which Respondent has any knowledge. A failure to admit, deny or explain any material fact or allegation contained in this Complaint will constitute an admission of the allegation. Where the Respondent has no knowledge of a particular factual allegation and so states, the allegation is deemed denied. The Answer must also state: (1) the circumstances or arguments which are alleged to constitute the grounds of defense; (2) the facts which Respondent intends to place at issue; (3) the basis for opposing any proposed relief; and (4) whether a hearing is requested.

75. If Respondent requests a public hearing, it will be held in a location determined in accordance with the Consolidates Rules, a copy of which accompanies the Complaint. The hearing will be conducted in accordance with the provisions of the Administrative Procedure Act, 5 U.S.C. §§ 552 *et seq.*, and 40 C.F.R. Part 22. Respondent may request a hearing on any material fact alleged in the Complaint, or on the appropriateness of any proposed penalty, compliance or corrective action order.
76. Respondent's failure to request a Hearing or to file a written Answer within 30 days after receiving this Complaint may result in the waiver of its right to contest allegations set forth in this Complaint or a default judgment pursuant to 40 C.F.R. §§ 22.15, 22.17.

#### **B. INFORMAL SETTLEMENT**

77. Whether or not Respondent request a hearing, Respondent may confer informally with EPA to discuss the alleged facts, violations and amount of the penalty. An informal conference does not, however, affect Respondent's obligation to file a written Answer within thirty (30) days of the Effective Date of the Complaint. The informal conference procedure may be pursued simultaneously with the adjudicatory hearing procedure.
78. Any settlement reached as a result of an informal conference will be embodied in a written Consent Agreement and Final Order. The issuance of the Consent Agreement and Final Order will constitute waiver of Respondent's right to a hearing on any matter to which Respondent has stipulated. Any settlement must comply with the required provisions and procedures set forth at 40 C.F.R. § 22.18.



79. If a settlement cannot be reached through an informal conference, the filing of a written Answer within thirty (30) days of the Effective Date of this Complaint will preserve Respondent's right to a hearing.

80. EPA encourages all parties against whom a penalty is proposed to explore the possibility of settlement. To request an informal conference, Respondent should contact David H. Kim, ORC-3, Assistant Regional Counsel, Office of Regional Counsel, at the above address, or telephone number (415) 972-3882.

### III. EFFECTIVE DATE

81. The "Effective Date" of this Complaint shall be as provided in Section 3008(b) of RCRA, 42 U.S.C. § 6928(b) and the Consolidated Rules.

\_\_8/5/2025\_\_  
Date

Respectfully Submitted,  
**AMY MILLER-  
BOWEN**

Digitally signed by AMY MILLER-  
BOWEN  
Date: 2025.08.05 10:02:24 -07'00'

Amy Miller-Bowen

Director  
Enforcement and Compliance  
Assurance Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
(415) 947-4198  
[Miller.amy@epa.gov](mailto:Miller.amy@epa.gov)

CERTIFICATE OF SERVICE

I certify that the original of the fully executed Complaint and Notice of Opportunity for Hearing in the matter of Unitek Solvent Services, Inc. (Docket No. RCRA-09-2025-0113) was filed with the Regional Hearing Clerk, U.S. EPA, Region IX, 75 Hawthorne Street, San Francisco, CA 94105, and that a true and correct copy of the same was sent to the following parties:

A copy was mailed via CERTIFIED MAIL to:

Byron Manipon  
Unitek Solvent Services, Inc.  
91-125 Kaomi Loop  
Kapolei, HI 96707-1711  
[byron@uniteksolvent.com](mailto:byron@uniteksolvent.com)

**CERTIFIED MAIL NUMBER:** \_\_\_\_7016 1370 0000 2234 8428\_\_\_\_

And additional copy was emailed to the following U.S. EPA case attorney:


David H. Kim  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
[kim.david@epa.gov](mailto:kim.david@epa.gov)

Dated: \_\_\_\_\_

By: \_\_\_\_\_

**CAROL  
SACHS**

Carol Sachs  
U.S. Environmental Protection Agency, Region IX

 Digitally signed by CAROL  
SACHS  
Date: 2025.08.06 14:25:27  
-07'00'