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HEARINGS CLERK
EPA--REGION 10

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

NORTH SLOPE BOROUGH,
SOUTH PAD,

Barrow, Alaska,

Respondent.

)
) DOCKET NO. RCRA-10-2015-0123
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)

) **CONSENT AGREEMENT**
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I. STATUTORY AUTHORITY

1.1. This Consent Agreement is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency ("EPA") by Section 3008 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6928.

1.2. Pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, and in accordance with the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties," 40 C.F.R. Part 22, EPA issues, and North Slope Borough ("Respondent") agrees to issuance of the Final Order attached to this Consent Agreement ("Final Order").

II. PRELIMINARY STATEMENT

2.1. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b), issuance of this Consent Agreement commences this proceeding, which will conclude when the Final Order becomes effective.

2.2. The Director of the Office of Compliance and Enforcement, EPA Region 10 (“Complainant”) has been delegated the authority pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, to sign consent agreements between EPA and the party against whom an administrative penalty for violations of RCRA is proposed to be assessed.

2.3. Part III of this Consent Agreement contains a concise statement of the factual and legal basis for the alleged violations of RCRA together with the specific provisions of RCRA and the implementing regulations that Respondent is alleged to have violated.

III. ALLEGATIONS

3.1 In 1976, Congress enacted RCRA, amending the Solid Waste Disposal Act, to regulate hazardous waste management. The Hazardous Waste and Solid Waste Amendments of 1984 (HSWA) provides additional authority under RCRA to regulate hazardous wastes. Under Subtitle C of RCRA, RCRA Section 3001 *et seq.*, 42 U.S.C. § 6921 *et seq.*, EPA has the authority to identify and list hazardous wastes. RCRA Subtitle C also authorizes EPA to regulate hazardous waste generators, transporters, exporters, and the owners and operators of hazardous waste treatment, storage, and disposal facilities. EPA has promulgated federal regulations to implement RCRA Subtitle C, which are set forth at 40 C.F.R. Parts 260-270, 273, and 279.

3.2 Pursuant to Section 3001 of RCRA, 42 U.S.C. § 6921, EPA promulgated regulations to define what materials are “solid wastes,” and of these solid wastes, what wastes are “hazardous wastes.” These regulations are set forth in 40 C.F.R. Part 261.

3.3 “Solid waste” is defined at 40 C.F.R. § 261.2 to mean “any discarded material that is not otherwise excluded by regulation.”

3.4 “Discarded material” is defined at 40 C.F.R. § 261.2(a)(2)(i) to mean any material which is abandoned.

3.5 Pursuant to 40 C.F.R. § 261.2(b), “materials are solid waste if they are abandoned by being disposed of; or burned or incinerated; or accumulated, stored, or treated (but not recycled) before or in lieu of being abandoned by being disposed of, burned, or incinerated.”

3.6 Pursuant to 40 C.F.R. § 261.3, “a solid waste is a ‘hazardous waste’ if it is not excluded from regulation as a hazardous waste under 40 C.F.R. § 261.4(b) and it exhibits any of the characteristics of hazardous waste in 40 C.F.R. Part 261, Subpart C or is listed in 40 C.F.R. Part 261, Subpart D.”

3.7 Pursuant to 40 C.F.R. 261.21, a solid waste exhibits the characteristic of ignitability if a representative sample of the waste is a liquid and has a flash point of less than 60° Celsius (140° Fahrenheit).

3.8 Pursuant to 40 C.F.R. § 261.22, a solid waste exhibits the characteristic of corrosivity if a representative sample of the waste is an aqueous solution and has a pH less than or equal to 2 or greater than or equal to 12.5.

3.9 Pursuant to 40 C.F.R. § 261.24, a solid waste exhibits the characteristic of toxicity if, using the Toxicity Characteristic Leaching Procedure the extract from a representative sample

of the waste contains any of the contaminants listed in Table 1 at the concentration equal to or greater than the respective value in Table 1.

3.10 “Generator” is defined at 40 C.F.R. § 260.10 to mean “any person, by site, whose act or process produces hazardous waste identified or listed in 40 C.F.R. Part 261 or whose act first causes a hazardous waste to become subject to regulation.”

3.11 Pursuant to 40 C.F.R. § 262.11, a person who generates a solid waste must determine if that waste is hazardous waste using the method provided therein.

3.12 “Facility” is defined at 40 C.F.R. § 260.10 to mean “all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste.”

3.13 Section 3005 of RCRA, 42 U.S.C. § 6925, prohibits the treatment, storage or disposal of hazardous waste without a permit or interim status, and the regulation at 40 C.F.R. § 270.1(c) requires a RCRA permit for the treatment, storage, or disposal of any hazardous waste identified or listed in 40 C.F.R. Part 261.

3.14 The owner and operator of a facility that does not have interim status pursuant to Section 3005(e) of RCRA, 42 U.S.C. § 6925, and 40 C.F.R. § 270.10 must meet the conditions in 40 C.F.R. Part 264.

3.15 A generator of hazardous waste may accumulate hazardous waste on-site for 90 days without obtaining a permit under 40 C.F.R. § 270.1 only if the generator complies with all the conditions in 40 C.F.R. § 262.34.

3.16 The conditions in 40 C.F.R. § 262.34 include, *inter alia*:

3.17.1. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;

3.17.2. While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste."

3.17.3. The waste is placed in containers that comply with the requirements of 40 C.F.R. Part 265, Subpart I.

3.17.4. The generator complies with the requirements for owners or operators in Subparts C and D in 40 C.F.R. part 265, with 40 C.F.R. § 265.16, and with all applicable requirements under 40 C.F.R. part 268.

3.17 In accordance with 40 C.F.R. § 265.171, "if the container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition"

3.18 In accordance with 40 C.F.R. § 265.173(b), "a container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak."

3.19 In accordance with 40 C.F.R. § 265.174, "[at] least weekly, the owner or operator must inspect areas where containers are stored"

3.20 In accordance with 40 C.F.R. § 265.172, "the owner or operator must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous wastes to be stored, so that the ability of the container to contain the waste is not impaired."

3.21 In accordance with 40 C.F.R. § 265.177(c), “a storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.”

3.22 In accordance with 40 C.F.R. § 265.31, “facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.”

3.23 In accordance with 40 C.F.R. § 265.51(a), “each owner or operator must have a contingency plan for his facility.”

3.24 In accordance with 40 C.F.R. § 265.55, “at all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with responsibility for coordinating all emergency response measures.”

3.25 Respondent is a municipality in the State of Alaska.

3.26 Respondent is a “person” as that term is defined by Section 1004(15) of RCRA, 42 U.S.C. § 6903(15) and 40 C.F.R. § 260.10.

3.27 At all times relevant to the allegations set forth herein, Respondent owned and operated a constructed gravel pad located on Nunavaaq Street in Barrow, Alaska, approximately 0.8 mile south-southwest of the Wiley Post-Will Rogers Memorial Airport (“South Pad”).

3.28 At all times relevant to this CAFO, the South Pad did not have interim status.

3.29 Prior to November 5, 2012, Respondent abandoned in lieu of disposal approximately 350 metal drums and multiple 1-gallon and 5-gallon containers, and approximately 111 5-gallon buckets of material at the South Pad.

3.30 Therefore, Respondent generated approximately 350 metal drums and multiple 1-gallon and 5-gallon containers, and approximately 111 buckets of solid waste at the South Pad prior to November 5, 2012.

3.31 From at least November 5, 2012, until at least December 10, 2012, Respondent stored the approximately 350 metal drums and multiple 1-gallon and 5-gallon containers of solid waste outside on soil or wooden pallets or platforms on the northeastern portion of the pad.

3.32 On or around December 10, 2012, Respondent placed the multiple 1-gallon and 5-gallon containers of solid waste into “overpack” drums. On or around December 10, 2012, after Respondent moved the smaller containers into the drums, there were a total of 517 drums of solid waste located on the northeastern portion of the pad.

3.33 From at least November 5, 2012, until December 15, 2012, Respondent stored the 111 5-gallon buckets of solid waste on the southwestern portion of the pad as well as within an enclosure known as the Wood Storage Building.

COUNT I: FAILURE TO CONDUCT A HAZARDOUS WASTE DETERMINATION – SOLVENT DRUMS

3.34 Pursuant to 40 C.F.R. § 262.11, a person who generates a solid waste must determine if that waste is hazardous waste using the method provided therein.

3.35 Approximately 43 of the drums generated at the South Pad prior to November 5, 2012, contained waste solvents (“Solvent Drums”).

3.36 Respondent failed to determine if the Solvent Drums at the South Pad contained hazardous waste on or before November 5, 2012.

3.37 Therefore, Respondent violated 40 C.F.R. § 262.11.

**COUNT II: FAILURE TO CONDUCT A HAZARDOUS WASTE DETERMINATION –
PAINT DRUMS AND BUCKETS**

3.38 Pursuant to 40 C.F.R. § 262.11, a person who generates a solid waste must determine if that waste is hazardous waste using the method provided therein.

3.39 Approximately 21 of the drums and 111 buckets of material generated at the South Pad prior to November 5, 2012, contained waste paint and paint related materials (“Paint Drums and Buckets”).

3.40 Respondent failed to determine if the Paint Drums and Buckets at the South Pad contained hazardous waste on or before November 5, 2012.

3.41 Therefore, Respondent violated 40 C.F.R. § 262.11.

**COUNT III: FAILURE TO CONDUCT A HAZARDOUS WASTE DETERMINATION –
ACID DRUMS**

3.42 Pursuant to 40 C.F.R. § 262.11, a person who generates a solid waste must determine if that waste is hazardous waste using the method provided therein.

3.43 Approximately 4 of the drums generated at the South Pad prior to November 5, 2012, contained waste acids and acid spill cleanup (“Acid Drums”).

3.44 Respondent failed to determine if the Acid Drums at the South Pad contained hazardous waste on or before November 5, 2012.

3.45 Therefore, Respondent violated 40 C.F.R. § 262.11.

**COUNT IV: FAILURE TO CONDUCT A HAZARDOUS WASTE DETERMINATION –
ALKALINE DRUMS**

3.46 Pursuant to 40 C.F.R. § 262.11, a person who generates a solid waste must determine if that waste is hazardous waste using the method provided therein.

3.47 Approximately 2 of the drums generated at the South Pad prior to November 5, 2012, contained waste alkaline liquids (“Alkaline Drums”).

3.48 Respondent failed to determine if the Alkaline Drums at the South Pad contained hazardous waste on or before November 5, 2012.

3.49 Therefore, Respondent violated 40 C.F.R. § 262.11.

**COUNT V: FAILURE TO CONDUCT A HAZARDOUS WASTE DETERMINATION –
ANTIFREEZE DRUMS**

3.50 Pursuant to 40 C.F.R. § 262.11, a person who generates a solid waste must determine if that waste is hazardous waste using the method provided therein.

3.51 Approximately 23 of the drums generated at the South Pad prior to November 5, 2012, contained waste antifreeze contaminated with benzene (“Antifreeze Drums”).

3.52 Respondent failed to determine if the Antifreeze Drums at the South Pad contained hazardous waste on or before November 5, 2012.

3.53 Therefore, Respondent violated 40 C.F.R. § 262.11.

**COUNT VI: OPERATION OF A TREATMENT STORAGE AND DISPOSAL FACILITY
WITHOUT A PERMIT**

3.54 The allegations set forth in paragraphs 3.1 through 3.53 are restated and incorporated by reference herein.

3.55 The Solvent Drums generated at the South Pad prior to November 5, 2012, exhibited the characteristics of ignitability and toxicity.

3.56 The Solvent Drums contained at least 18,000 pounds of waste solvent.

3.57 The Paint Drums and Buckets generated at the South Pad prior to November 5, 2012, exhibited the characteristics of ignitability and toxicity. Several of the Paint Drums and Buckets also contained specific spent non-halogenated solvents rendering the contents hazardous under 40 C.F.R. § 261.31(a) with waste codes F003 and F005.

3.58 The Paint Drums and Buckets contained at least 12,000 pounds of waste paint and paint related material.

3.59 The Acid Drums generated at the South Pad from prior to November 5, 2012, exhibited the characteristic of corrosivity.

3.60 The Acid Drums contained at least 2,600 pounds of waste acids and acid spill cleanup.

3.61 The Alkaline Drums generated at the South Pad prior to November 5, 2012, exhibited the characteristic of corrosivity.

3.62 The Alkaline Drums contained at least 400 pounds of waste alkaline liquids.

3.63 The Antifreeze Drums generated at the South Pad prior to November 5, 2012, exhibited the characteristic of toxicity.

3.64 The Antifreeze Drums contained at least 12,000 pounds of waste antifreeze contaminated with benzene.

3.65 Therefore, Respondent generated at least 45,000 pounds of hazardous waste at the South Pad prior to November 5, 2012.

3.66 Therefore, Respondent is a generator as that term is defined at 40 C.F.R. § 261.10.

3.67 Respondent accumulated the 45,000 pounds of hazardous waste at the South Pad until March 18, 2014, at least 498 days.

3.68 Therefore, Respondent accumulated the hazardous waste longer than 90 days from the date of generation.

3.69 The aforementioned "Solvent Drums," "Paint Drums and Buckets," "Acid Drums," "Alkaline Drums," and "Antifreeze Drums" generated at the South Pad shall hereinafter be collectively referred to as the "containers of hazardous waste."

3.70 The dates upon which the containers of hazardous waste were generated were not clearly marked and visible for inspection.

3.71 The containers of hazardous waste were not labeled or marked clearly with the words "Hazardous Waste."

3.72 Between November 5, 2012, and December 15, 2012, at least one container of hazardous waste was severely rusting and Respondent failed to transfer the waste from the container to a container that was in good condition.

3.73 From at least November 5, 2012, until December 15, 2012, respondent stored the containers of hazardous waste in a manner which may have caused the containers to leak.

3.74 From at least November 5, 2012, until December 15, 2012, Respondent failed to inspect at least weekly where the containers of hazardous waste were stored.

3.75 From at least November 5, 2012, until March 18, 2014, Respondent stored hazardous waste in the form of corrosive liquids in two unlined metal drums. Corrosive liquids react with, and are not otherwise compatible with, metal.

3.76 From at least November 5, 2012, until March 18, 2014, Respondent failed to separate storage containers holding hazardous waste from other incompatible wastes stored nearby.

3.77 From at least November 5, 2012, until December 15, 2012, Respondent failed to maintain and operate the South Pad to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

3.78 From at least November 5, 2012, until at least December 15, 2012, Respondent failed to have a contingency plan.

3.79 From at least November 5, 2012, until December 15, 2012, Respondent failed to have at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with responsibility for coordinating all emergency response measures.

3.80 Therefore, the South Pad was a “facility” as that term is defined at 40 C.F.R. § 261.10.

3.81 Respondent did not obtain a permit pursuant to Section 3005 of RCRA, 42 U.S.C. § 6925, and 40 C.F.R. § 270.1(c).

3.82 Therefore, Respondent violated Section 3005 of RCRA, 42 U.S.C. § 6925, and 40 C.F.R. § 270.1(c).

ENFORCEMENT AUTHORITY

3.83 Under Section 3008 of RCRA, 42 U.S.C. § 6928, and 40 C.F.R. Part 19, EPA may assess a civil penalty of not more than \$37,500 per day of each violation, issue an order requiring compliance, or both.

IV. TERMS OF SETTLEMENT

4.1. Respondent admits the jurisdictional allegations of this Consent Agreement.

4.2. Respondent neither admits nor denies the specific factual allegations contained in this Consent Agreement.

4.3. As required by Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), EPA has taken into account the seriousness of the violation and any good faith efforts to comply with applicable requirements. After considering these factors, EPA has determined and Respondent agrees that an appropriate penalty to settle this action is \$445,336.

4.4. Respondent agrees to pay the total civil penalty set forth in Paragraph 4.3 within 30 days of the effective date of the Final Order, and to undertake the actions specified in this Consent Agreement.

4.5. Payment under this Consent Agreement and the Final Order may be paid by check (mail or overnight delivery), wire transfer, ACH, or online payment. Payment instructions are available at: <http://www2.epa.gov/financial/makepayment>. Payments made by a cashier's check or certified check must be payable to the order of "Treasurer, United States of America" and delivered to the following address:

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

Respondent must note on the check the title and docket number of this action.

4.6. Concurrently with payment, Respondent must serve photocopies of the check, or proof of other payment method, described in Paragraph 4.5 on the Regional Hearing Clerk and EPA Region 10 at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 10, Mail Stop ORC-113
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101
Smith.candace@epa.gov

Jennifer Parker
U.S. Environmental Protection Agency
Region 10, Mail Stop OCE-101
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101
Parker.jennifer@epa.gov

4.7. If Respondent fails to pay any portion of the penalty assessed by this Consent Agreement and the Final Order in full by its due date, the entire unpaid balance of penalty and accrued interest shall become immediately due and owing. If such a failure to pay occurs, Respondent may be subject to a civil action to collect any unpaid penalties, together with interest, handling charges, and nonpayment penalties, as set forth below. In any collection action, the validity, amount, and appropriateness of the penalty shall not be subject to review.

4.8. If Respondent fails to pay any portion of the penalty assessed by this Consent Agreement and the Final Order in full by its due date, Respondent shall also be responsible for payment of the following amounts:

4.8.1. Interest. Pursuant to 31 U.S.C. § 3717(a)(1), any unpaid portion of the assessed penalty shall bear interest at the rate established by the Secretary of the Treasury from the effective date of the Final Order attached hereto, provided, however, that no

interest shall be payable on any portion of the assessed penalty that is paid within 30 days of the effective date of the Final Order attached hereto.

4.8.2. Handling Charge. Pursuant to 31 U.S.C. § 3717(e)(1), a monthly handling charge of \$15 shall be paid if any portion of the assessed penalty is more than 30 days past due.

4.8.3. Nonpayment Penalty. Pursuant to 31 U.S.C. § 3717(e)(2), a nonpayment penalty of 6% per annum shall be paid on any portion of the assessed penalty that is more than 90 days past due, which nonpayment shall be calculated as of the date the underlying penalty first becomes past due.

4.9. Under Section 3008(c) of RCRA, 42 U.S.C. § 6928(c), failure to take corrective action within the time specified in this Consent Agreement may subject Respondent to additional civil penalties for each day of continued noncompliance.

4.10. Based on the findings contained in this Consent Agreement, Respondent is also ordered to comply with the following requirements pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a).

4.11. For each solid waste Respondent generates at the Facility, Respondent shall determine if that solid waste is a hazardous waste according to the method provided in 40 C.F.R. § 262.11.

4.12. Respondent shall not generate, accumulate, treat, nor store hazardous waste at the Facility unless Respondent either obtains a permit to operate a hazardous waste management facility pursuant to Section 3005 of RCRA, 42 U.S.C. § 6925, and 40 C.F.R. § 270.1(c) or

complies with the conditions for generating and accumulating hazardous waste in 40 C.F.R. § 262.34 or 40 C.F.R. § 261.5, as the case may be.

4.13. The penalty described in Paragraph 4.3, including any additional costs incurred under Paragraph 4.8 represents an administrative civil penalty assessed by EPA and shall not be deductible for purposes of federal taxes.

4.14. The undersigned representative of Respondent certifies that he or she is authorized to enter into the terms and conditions of this Consent Agreement and to bind Respondent to this document.

4.15. Except as described in Paragraph 4.8 each party shall bear its own costs and attorney's fees in bringing or defending this action.

4.16. Respondent expressly waives any right to contest the allegations contained in this Consent Agreement and to appeal the Final Order.

4.17. Respondent 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 the Final Order, including any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

4.18. The provisions of this Consent Agreement and the Final Order shall bind Respondent and its agents, servants, employees, successors, and assigns.

4.19. Respondent consents to the issuance of any specified compliance or corrective action order, and to any stated permit action.

4.20. The above provisions are STIPULATED AND AGREED upon by Respondent and EPA Region 10.

DATED:

June 30, 2015

FOR RESPONDENT:

Charlotte E. Brower

CHARLOTTE E. BROWER, Mayor
North Slope Borough

DATED:

July 14, 2015

FOR COMPLAINANT:

Edward J. Kowalski

EDWARD J. KOWALSKI, Director
Office of Compliance and Enforcement
EPA Region 10

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:)
NORTH SLOPE BOROUGH,) DOCKET NO. RCRA-10-2015-0123
SOUTH PAD,) **FINAL ORDER**
Barrow, Alaska)
Respondent.)

1.1. The Administrator has delegated the authority to issue this Final Order to the Regional Administrator of EPA Region 10, who has redelegate this authority to the Regional Judicial Officer in EPA Region 10.

1.2. The terms of the foregoing Consent Agreement are ratified and incorporated by reference into this Final Order. Respondent is ordered to comply with the terms of settlement.

1.3. The Consent Agreement and this Final Order constitute a settlement by EPA of all claims for civil penalties under RCRA for the violations alleged in Part III of the Consent Agreement. In accordance with 40 C.F.R. § 22.31(a), nothing in this Final Order shall affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law. This Final Order does not waive, extinguish, or otherwise affect Respondent's obligations to comply with all applicable provisions of RCRA and regulations promulgated or permits issued thereunder.

1.4. This Final Order shall become effective upon filing with the Regional Hearing Clerk.

SO ORDERED this 16th day of July, 2015.


M. SOCORRO RODRIGUEZ
Regional Judicial Officer
EPA Region 10

Certificate of Service

The undersigned certifies that the original of the attached **CONSENT AGREEMENT AND FINAL ORDER, In the Matter of: North Slope Borrow, South Pad, Docket No.: RCRA-10-2015-0123**, was filed with the Regional Hearing Clerk and served on the addressees in the following manner on the date specified below:

The undersigned certifies that a true and correct copy of the document was delivered to:

Brett S. Dugan
U.S. Environmental Protection Agency
Region 10, Mail Stop ORC-113
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

Further, the undersigned certifies that a true and correct copy of the aforementioned document was placed in the United States mail certified/return receipt to:

Charlotte E. Brower
Mayor
North Slope Borough
1274 Agvik Street
Barrow, Alaska 99723

DATED this 20th day of July, 2015.


CANDACE H. SMITH
Regional Hearing Clerk
EPA Region 10