

**\*\* FILED \*\***  
**11AUG2017 - 10:35AM**  
**U.S.EPA - Region 09**

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 HAWTHORNE STREET  
SAN FRANCISCO, CA 94105

In the Matter of: )  
Ricoh Electronics, Inc., ) Docket No. TSCA-09-2017-0009  
)  
) CONSENT AGREEMENT  
) AND FINAL ORDER  
) PURSUANT TO 40 C.F.R.  
) §§ 22.13 and 22.18  
Respondent. )

I. CONSENT AGREEMENT

The United States Environmental Protection Agency, Region IX ("EPA") and Ricoh Electronics, Inc. ("Respondent") agree to settle this matter and consent to the entry of this Consent Agreement and Final Order ("CAFO"), which simultaneously initiates and concludes this matter in accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b).

A. AUTHORITY AND PARTIES

1. This is a civil administrative penalty action initiated against Respondent pursuant to Section 16(a) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2615(a), for violations of Section 8(a) of TSCA, 15 U.S.C. § 2607(a), and federal regulations promulgated to implement Section 8(a) at 40 C.F.R. Part 711.

2. Complainant is the Director of the Enforcement Division, EPA Region IX, who has been duly delegated the

authority to bring this action and to sign a consent agreement settling this action.

3. Respondent is a California corporation with principal business offices located at 1100 Valencia Avenue in Tustin, California.

B. APPLICABLE STATUTORY AND REGULATORY SECTIONS

4. Section 8(a)(1)(A) of TSCA, 15 U.S.C. § 2607(a)(1)(A), provides that the EPA Administrator shall promulgate rules under which each person (other than a small manufacturer or processor) who manufactures or processes or proposes to manufacture or process a chemical substance shall maintain such records, and shall submit to the Administrator such reports, as the Administrator may reasonably require.

5. 40 C.F.R. Part 710 establishes regulations governing reporting and recordkeeping by certain persons who manufacture, import, or process chemical substances for commercial purposes under TSCA Section 8(a) and applies to the activities associated with the compilation of the TSCA Chemical Substance Inventory ("TSCA Inventory") and the update of information on a subset of the chemical substances included on the TSCA Inventory.

6. 40 C.F.R. Part 711 specifies reporting and recordkeeping procedures under TSCA Section 8(a) for certain manufacturers (including importers) of chemical substances and applies to the activities associated with the periodic update of information on a subset of the chemical substances included on

the TSCA Inventory.

7. 40 C.F.R. § 711.8(a) provides that, for the 2012 submission period, any person who manufactured (including imported) for commercial purposes 25,000 lbs (11,340 kilograms [kg]) or more of a chemical substance described in § 711.5 at any single site owned or controlled by that person during the principal reporting year (i.e., calendar year 2011) is subject to reporting.

8. 40 C.F.R. § 711.5 provides that any chemical substance that is in the Master Inventory File at the beginning of a submission period must be reported unless exempt by § 711.6.

9. "Master Inventory File" means EPA's comprehensive list of chemical substances which constitutes the TSCA Inventory compiled under TSCA Section 8(b). 40 C.F.R. § 711.3.

10. "Person" means any natural or judicial person including any individual, corporation, partnership, or association, any State or political subdivision thereof, or any municipality, any interstate body and any department, agency, or instrumentality of the Federal Government. 40 C.F.R. § 710.3.

11. "Manufacture or import 'for commercial purposes'" means to manufacture, produce, or import with the purpose of obtaining an immediate or eventual commercial advantage, and includes, for example, the manufacture or import of any amount of a chemical substance or mixture for commercial distribution, including test marketing, or for use by the manufacturer, including use for

product research and development, or as an intermediate. 40 C.F.R. § 710.3.

12. The "site" for an importer who imports a chemical substance is the U.S. site of the operating unit within the person's organization that is directly responsible for importing the chemical substance. 40 C.F.R. § 711.3.

13. "Principal reporting year" means the latest complete calendar year preceding the submission period. 40 C.F.R. § 711.3.

14. 40 C.F.R. § 711.20 provides that all information reported to EPA in response to the requirements of Part 711 must be submitted during an applicable submission period. The 2012 CDR submission period ran from February 1, 2012 to August 13, 2012.

15. 40 C.F.R. § 711.15 provides that, for the 2012 submission period, any person who must report under Part 711, as described in § 711.8, must submit the information described in this section for each chemical substance described in § 711.5 that the person manufactured (including imported) for commercial purposes in an amount of 25,000 lbs (11,340 kgs) or more at any one site during the principal reporting year (i.e., calendar year 2011).

16. 40 C.F.R. § 711.15(a) provides that any person who reports information to EPA must do so using the e-CDRweb reporting tool provided by EPA at the address set forth in §

711.35 and must submit a separate Form U for each site for which the person is required to report.

17. 40 C.F.R. § 711.15(b)(3)(iii) provides that, for the principal reporting year, the total annual volume (in pounds) of each reportable chemical substance domestically manufactured or imported at each site must be reported; the total annual domestically manufactured volume (not including imported volume) and the total annual imported volume must be separately reported; and these amounts must be reported to two significant figures of accuracy.

18. 40 C.F.R. § 711.25 provides that [e]ach person who is subject to the reporting requirements of this part (i.e., Part 711) must retain records that document any information reported to EPA. Records relevant to reporting during a submission period must be retained for a period of 5 years beginning on the last day of the submission period.

19. TSCA Sections 15(3)(A) and (B), 15 U.S.C. §§ 2614(3)(A) and (B), state that it is unlawful for any person to fail or refuse to establish or maintain records or submit reports, notices or other information required by TSCA or a rule thereunder.

20. Section 16(a) of TSCA, 15 U.S.C. § 2615(a), and the Civil Monetary Penalty Inflation Adjustment Rule at 40 C.F.R. Part 19, which implements the Federal Civil Penalties Inflation Adjustment Act of 1990, Pub. L. 101-410, authorize civil

penalties not to exceed \$37,500 per day for each violation of Section 15 of TSCA that occurred after January 12, 2009 but before November 2, 2015.

C. ALLEGATIONS

21. Respondent is a "person" as that term is defined at 40 C.F.R. § 710.3.

22. During calendar year 2011, Respondent owned and controlled "sites," as that term is defined at 40 C.F.R. § 711.3, located at 1123 Warner Avenue in Tustin, California ("Tustin Site"), 2320 Red Hill Avenue in Santa Ana, California ("Santa Ana Site"), and 1125 Hurricane Shoals Road, Northeast in Lawrenceville, Georgia ("Lawrenceville Site").

23. During calendar year 2011, Respondent "imported for commercial purposes," as those terms are defined at 40 C.F.R. § 710.3, more than 25,000 lbs of Lampblack (CAS No. 1333-86-4) and Ceramic materials and wares, chemicals (CAS No. 66402-68-4) at the Tustin and Lawrenceville Sites, more than 25,000 lbs of Carnauba wax (CAS No. 8015-86-9) at the Tustin, Santa Ana and Lawrenceville Sites, and more than 25,000 lbs of Benzene, methyl (CAS No. 108-88-3), Titanium oxide (CAS No. 13463-67-7), Copper, [29H,31H-phthalocyaninato(2)-.kappa.N29,.kappa.N30,.kappa.N31,.kappa.N32]-, (SP-4-1) (CAS No. 147-14-8), 2-Naphthalenecarboxamide, N-(5-chloro-2-methoxyphenyl)-3-hydroxy-4-[2-[2methoxy-5[(phenylamino)carbonyl]phenyl]diazenyl]- (CAS No. 67990-05-0), Silica (CAS No. 7631-86-

9), Paraffin waxes and Hydrocarbon waxes (CAS No. 8002-74-2), and Waxes and Waxy substances, rice bran (CAS No. 8016-60-2) at the Lawrenceville Site.

24. Lampblack (CAS No. 1333-86-4), Ceramic materials and wares, chemicals (CAS No. 66402-68-4), Carnauba wax (CAS No. 8015-86-9), Benzene, methyl (CAS No. 108-88-3), Titanium oxide (CAS No. 13463-67-7), Copper, [29H,31H-phthalocyaninato(2)-.kappa.N29,.kappa.N30,.kappa.N31,.kappa.N32]-, (SP-4-1) (CAS No. 147-14-8), 2-Naphthalenecarboxamide, N-(5-chloro-2-methoxyphenyl)-3-hydroxy-4-[2-[2methoxy-5[(phenylamino)carbonyl]phenyl]diazanyl]- (CAS No. 67990-05-0), Silica (CAS No. 7631-86-9), Paraffin waxes and Hydrocarbon waxes (CAS No. 8002-74-2), and Waxes and Waxy substances, rice bran (CAS No. 8016-60-2) are each a chemical substance that was in the Master Inventory File at the beginning of the 2012 submission period, as described by 40 C.F.R. § 711.5.

25. Accordingly, pursuant to 40 C.F.R. §§ 711.8, 711.15 and 711.20, between February 1, 2012 and August 13, 2012, Respondent was required to and did submit Form Us to EPA reporting the chemical substances, Lampblack (CAS No. 1333-86-4) and Ceramic materials and wares, chemicals (CAS No. 66402-68-4) and Carnauba wax (CAS No. 8015-86-9), imported for commercial purposes at the Tustin Site during calendar year 2011, the chemical substance, Carnauba wax (CAS No. 8015-86-9) imported for commercial purposes at the Santa Ana Site during calendar year 2011, and

the chemical substances, Lampblack (CAS No. 1333-86-4), Ceramic materials and wares, chemicals (CAS No. 66402-68-4), Carnauba wax (CAS No. 8015-86-9), Benzene, methyl (CAS No. 108-88-3), Titanium oxide (CAS No. 13463-67-7), Copper, [29H,31H-phthalocyaninato(2)-.kappa.N29,.kappa.N30,.kappa.N31,.kappa.N32]-, (SP-4-1) (CAS No. 147-14-8), 2-Naphthalenecarboxamide, N-(5-chloro-2-methoxyphenyl)-3-hydroxy-4-[2-[2methoxy-5[(phenylamino)carbonyl] phenyl]diazenyl]- (CAS No. 67990-05-0), Silica (CAS No. 7631-86-9), Paraffin waxes and Hydrocarbon waxes (CAS No. 8002-74-2), and Waxes and Waxy substances, rice bran (CAS No. 8016-60-2) imported for commercial purposes at the Lawrenceville Site during calendar year 2011.

26. For the principal reporting year, the total annual volume (in pounds) of each reportable chemical substance imported at each site must be reported to two significant figures of accuracy. 40 C.F.R. § 711.15(b)(3)(iii).

27. For calendar year 2011, Respondent submitted Form Us to EPA that contained significant errors and failed to report the total annual volume (in pounds) of the chemical substances, Lampblack (CAS No. 1333-86-4) and Ceramic materials and wares, chemicals (CAS No. 66402-68-4), imported at the Tustin site, and the chemical substance, Carnauba wax (CAS No. 8015-86-9), imported at the Tustin and Santa Ana Sites, to two significant figures of accuracy.

28. Respondent's failures to report the total annual volume



(in pounds) of the chemical substances, Lampblack (CAS No. 1333-86-4) and Ceramic materials and wares, chemicals (CAS No. 66402-68-4), imported at the Tustin site, and the chemical substance, Carnauba wax (CAS No. 8015-86-9), imported at the Tustin and Santa Ana Sites, to two significant figures of accuracy for calendar year 2011 constitute four (4) violations of 40 C.F.R. § 711.15(b)(3)(iii) and TSCA Section 15(3)(B), 15 U.S.C. § 2614(3)(B).

29. On or about February 2015, inspectors for EPA Region IX requested that Respondent check the accuracy of the amount of the chemical substances, Lampblack (CAS No. 1333-86-4), Ceramic materials and wares, chemicals (CAS No. 66402-68-4), Carnauba wax (CAS No. 8015-86-9), Benzene, methyl (CAS No. 108-88-3), Titanium oxide (CAS No. 13463-67-7), Copper, [29H,31H-phthalocyaninato(2)-.kappa.N29,.kappa.N30,.kappa.N31,.kappa.N32]-, (SP-4-1) (CAS No. 147-14-8), 2-Naphthalenecarboxamide, N-(5-chloro-2-methoxyphenyl)-3-hydroxy-4-[2-[2methoxy-5[(phenylamino)carbonyl] phenyl]diazanyl]- (CAS No. 67990-05-0), Silica (CAS No. 7631-86-9), Paraffin waxes and Hydrocarbon waxes (CAS No. 8002-74-2), and Waxes and Waxy substances, rice bran (CAS No. 8016-60-2) imported at the Lawrenceville Site during calendar year 2011 that were reported in the Form Us for the 2012 submission period.

30. Each person who is subject to the reporting requirements of this part (i.e., Part 711) must retain records

that document any information reported to EPA. Records relevant to reporting during a submission period must be retained for a period of 5 years beginning on the last day of the submission period. 40 C.F.R. § 711.25.

31. From on or about February 2015, Respondent did not have records that documented the amount of the chemical substances, Lampblack (CAS No. 1333-86-4), Ceramic materials and wares, chemicals (CAS No. 66402-68-4), Carnauba wax (CAS No. 8015-86-9), Benzene, methyl (CAS No. 108-88-3), Titanium oxide (CAS No. 13463-67-7), Copper, [29H,31H-phthalocyaninato(2)-.kappa.N29,.kappa.N30,.kappa.N31,.kappa.N32]-, (SP-4-1) (CAS No. 147-14-8), 2-Naphthalenecarboxamide, N-(5-chloro-2-methoxyphenyl)-3-hydroxy-4-[2-[2methoxy-5[(phenylamino)carbonyl]phenyl]diazenyl]- (CAS No. 67990-05-0), Silica (CAS No. 7631-86-9), Paraffin waxes and Hydrocarbon waxes (CAS No. 8002-74-2), and Waxes and Waxy substances, rice bran (CAS No. 8016-60-2) imported at the Lawrenceville Site during calendar year 2011 that were reported in the Form Us during the 2012 submission period.

32. Respondent's failures to retain for a period of 5 years records that documented the amount of the chemical substances, Lampblack (CAS No. 1333-86-4), Ceramic materials and wares, chemicals (CAS No. 66402-68-4), Carnauba wax (CAS No. 8015-86-9), Benzene, methyl (CAS No. 108-88-3), Titanium oxide (CAS No. 13463-67-7), Copper, [29H,31H-phthalocyaninato(2)-

.kappa.N29, .kappa.N30, .kappa.N31, .kappa.N32]-, (SP-4-1) (CAS No. 147-14-8), 2-Naphthalenecarboxamide, N-(5-chloro-2-methoxyphenyl)-3-hydroxy-4-[2-[2methoxy-5[(phenylamino)carbonyl]phenyl]diazenyl]- (CAS No. 67990-05-0), Silica (CAS No. 7631-86-9), Paraffin waxes and Hydrocarbon waxes (CAS No. 8002-74-2), and Waxes and Waxy substances, rice bran (CAS No. 8016-60-2) imported at the Lawrenceville Site during calendar year 2011 that were reported in the Form Us during the 2012 submission period constitute ten (10) violations of 40 C.F.R. § 711.25 and TSCA Section 15(3)(A), 15 U.S.C. § 2614(3)(A).

D. RESPONDENT'S ADMISSIONS

33. In accordance with 40 C.F.R. § 22.18(b)(2) and for the purpose of this proceeding, Respondent (i) admits that EPA has jurisdiction over the subject matter of this CAFO and over Respondent; (ii) neither admits nor denies the specific factual allegations contained in Section I.C of this CAFO; (iii) consents to any and all conditions specified in this CAFO and to the assessment of the civil administrative penalty under Section I.E of this CAFO; (iv) waives any right to contest the allegations contained in Section I.C of this CAFO; and (v) waives the right to appeal the proposed final order contained in this CAFO.

E. CIVIL ADMINISTRATIVE PENALTY

34. Respondent agrees to the assessment of a penalty in the amount of TWO HUNDRED, FORTY-FIVE THOUSAND, NINE HUNDRED AND

NINETY DOLLARS (\$245,990) as final settlement of the civil claims against Respondent arising under TSCA as alleged in Section I.C of this CAFO.

35. Respondent shall pay the assessed penalty no later than thirty (30) days after the effective date of the CAFO. The assessed penalty shall be paid by **certified or cashier's check**, payable to "Treasurer, United States of America," or paid by one of the other methods listed below and sent as follows:

Regular Mail:

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

Wire Transfers:

Wire transfers must be sent directly to the Federal Reserve Bank in New York City with the following information:

Federal Reserve Bank of New York  
ABA = 021030004  
Account = 68010727  
SWIFT address = FRNYUS33  
33 Liberty Street  
New York, NY 10045  
Field Tag 4200 of the Fedwire message should read "D 68010727  
Environmental Protection Agency"

Overnight Mail:

U.S. Bank  
1005 Convention Plaza  
Mail Station SL-MO-C2GL  
ATTN Box 979077  
St. Louis, MO 63101

ACH (also known as REX or remittance express):

US Treasury REX/Cashlink ACH Receiver

ABA = 051036706  
Account Number:310006, Environmental Protection Agency  
CTX Format Transaction Code 22 - checking  
Physical location of US Treasury Facility  
5700 Rivertech Court  
Riverdale, MD 20737  
Remittance Express (REX):1-866-234-5681

On Line Payment:

This payment option can be accessed from the information below:

www.pay.gov  
Enter "sfo 1.1" in the search field  
Open form and complete required fields

If clarification regarding a particular method of payment remittance is needed, contact the EPA Cincinnati Finance Center at 513-487-2081.

Concurrently, a copy of the check or notification that the payment has been made by one of the other methods listed above, including proof of the date payment was made, shall be sent with a transmittal letter indicating Respondent's name, the case title, and the docket number to:

- a) Regional Hearing Clerk (ORC-1)  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, California 94105
- b) Aisha Kennedy  
Waste & Chemical Section (ENF-2-2)  
Enforcement Division  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

36. Payment of the above civil administrative penalty shall not be used by Respondent or any other person as a tax

deduction from Respondent's federal, state, or local taxes.

37. If Respondent fails to pay the assessed civil administrative penalty specified in Paragraph 34 by the deadline specified in Paragraph 35, then Respondent shall pay to EPA a stipulated penalty of \$1,000 per day in addition to the assessed penalty. Stipulated penalties shall accrue until such time as the assessed penalty and all accrued stipulated penalties are paid and shall become due and payable upon written request by EPA. In addition, failure to pay the civil administrative penalty by the deadline specified in Paragraph 35 may lead to any or all of the following actions:

a. The debt being referred to a credit reporting agency, a collection agency, or to the Department of Justice for filing of a collection action in the appropriate United States District Court. 40 C.F.R. §§ 13.13, 13.14, and 13.33. In any such collection action, the validity, amount, and appropriateness of the assessed penalty and of this CAFO shall not be subject to review.

b. The debt being collected 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 income tax refunds. 40 C.F.R. Part 13, Subparts C and H.

c. EPA may (i) suspend or revoke Respondent's licenses or other privileges; or (ii) suspend or disqualify Respondent from doing business with EPA or engaging in programs EPA sponsors or funds. 40 C.F.R. § 13.17.

d. In accordance with the Debt Collection Act of 1982 and 40 C.F.R. Part 13 interest, penalties charges, and administrative costs will be assessed against the outstanding amount that Respondent owes to EPA for Respondent's failure to pay the civil administrative penalty by the deadline specified in Paragraph 35. Interest will be assessed at an annual rate that is equal to the rate of current value of funds to the United States Treasury (i.e., the Treasury tax and loan account rate) as prescribed and published by the Secretary of the Treasury in the Federal Register and the Treasury Fiscal Requirements Manual Bulletins. 40 C.F.R. § 13.11(a)(1). Penalty charges will be assessed monthly at a rate of 6% per annum. 40 C.F.R. § 13.11(c). Administrative costs for handling and collecting Respondent's overdue debt will be based on either actual or average cost incurred, and will include both direct and indirect costs. 40 C.F.R. § 13.11(b). In addition, if this matter is referred to another department or agency (e.g., the Department of Justice, the Internal Revenue Service), that department or agency may assess its own administrative costs, in addition to EPA's administrative costs, for handling and collecting Respondent's overdue debt.

F. RESPONDENT'S CERTIFICATION

38. In executing this CAFO, Respondent certifies that it is now fully in compliance with TSCA Section 8(a) and federal regulations promulgated to implement Section 8(a) at 40 C.F.R. Part 711.

G. RETENTION OF RIGHTS

39. In accordance with 40 C.F.R. § 22.18(c), this CAFO only resolves Respondent's liability for federal civil penalties for the violations and facts specifically alleged in Section I.C of this CAFO. Nothing in this CAFO is intended to or shall be construed to resolve (i) any civil liability for violations of any provision of any federal, state, or local law, statute, regulation, rule, ordinance, or permit not specifically alleged in Section I.C of this CAFO; or (ii) any criminal liability. EPA specifically reserves any and all authorities, rights, and remedies available to it (including, but not limited to, injunctive or other equitable relief or criminal sanctions) to address any violation of this CAFO or any violation not specifically alleged in Section I.C of this CAFO.

40. This CAFO does not exempt, relieve, modify, or affect in any way Respondent's duty to comply with all applicable federal, state, and local laws, regulations, rules, ordinances, and permits.

H. ATTORNEYS' FEES AND COSTS

41. Each party shall bear its own attorney's fees, costs,



and disbursements incurred in this proceeding.

I. EFFECTIVE DATE

42. In accordance with 40 C.F.R. §§ 22.18(b)(3) and 22.31(b), this CAFO shall be effective on the date that the final order contained in this CAFO, having been approved and issued by either the Regional Judicial Officer or Regional Administrator, is filed.

J. BINDING EFFECT

43. The undersigned representative of Complainant and the undersigned representative of Respondent each certifies that he or she is fully authorized to enter into the terms and conditions of this CAFO and to bind the party he or she represents to this CAFO.

44. The provisions of this CAFO shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assigns.

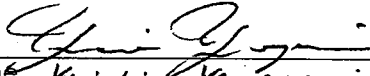
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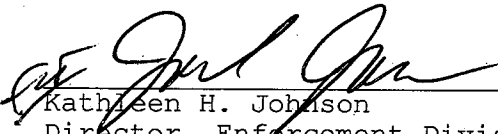
FOR RESPONDENT, RICOH ELECTRONICS, INC.

7-31-17  
DATE

  
Name Yuichi Yamagami  
Title E.V.P.  
RICOH ELECTRONICS, INC.

FOR COMPLAINANT, U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX

8-10-17  
DATE

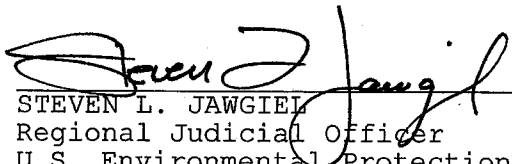
  
Kathleen H. Johnson  
Director, Enforcement Division  
U.S. ENVIRONMENTAL PROTECTION AGENCY,  
REGION IX

II. FINAL ORDER

Complainant and Respondent, having entered into the foregoing Consent Agreement,

IT IS HEREBY ORDERED that this CAFO (Docket No. TSCA-09-2017-~~8009~~) be entered, and that Respondent shall pay a civil administrative penalty in the amount of TWO HUNDRED, FORTY-FIVE THOUSAND, NINE HUNDRED AND NINETY DOLLARS (\$245,990) and comply with the terms and conditions set forth in the Consent Agreement. This Consent Agreement and Final Order shall become effective upon filing.

08/11/17  
DATE

  
STEVEN L. JAWGIEL  
Regional Judicial Officer  
U.S. Environmental Protection  
Agency, Region IX

## CERTIFICATE OF SERVICE

I hereby certify that the original ~~and a copy~~ of the foregoing Consent Agreement and Final Order in the matter of Ricoh Electronics, Inc., with Docket # **09-2017-0009 (TSCA)** has been filed with the Regional Hearing Clerk, Region IX and copies were sent:

By Certified Mail, Return Receipt Requested to Respondent:

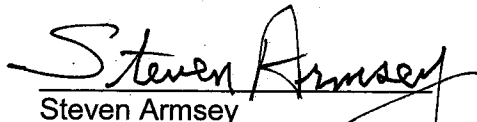
Anri Suzuki, Esq.  
General Counsel  
Rico Electronics, Inc.  
1100 Valencia Avenue  
Tustin, CA 92780

Certified Mail Receipt # **7001 2510 0003 5943 3744**

Hand Delivered to:

Carol Bussey  
Office of Regional Counsel  
U.S. EPA, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

11 Aug 2017  
Date

  
Steven Armsey  
~~Acting~~ Regional Hearing Clerk