

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
BEFORE THE ADMINISTRATOR

FILED  
2016 JUN 21 11 11 AM  
EPA REGION 6

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IN THE MATTER OF:

Sloan Valve Company

Augusta, Woodruff County  
State of Arkansas

RESPONDENT

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EPA DOCKET NO.  
RCRA-06-2016-0914

SLOAN VALVE COMPANY'S  
ANSWER TO COMPLAINT AND  
REQUEST FOR HEARING

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**SLOAN VALVE COMPANY'S ANSWER TO COMPLAINT AND REQUEST FOR HEARING**

Sloan Valve Company ("Respondent"), by and through its counsel, Dentons US LLP, in Answer to the Complaint, Compliance Order and Notice of Opportunity for Hearing ("Complaint") states as follows:

**ADMINISTRATIVE COMPLAINT**

Respondent acknowledges that this Complaint is issued under authority vested in the Environmental Protection Agency ("EPA") by its Regional Administrator and the Director of the Compliance and Enforcement Division of EPA Region 6 ("Complainant"). Respondent further acknowledges the applicability of the Consolidated Rules of Practice. Respondent does not have sufficient knowledge to admit or deny whether the State of Arkansas received notice of the Complaint, and on that basis, the allegation is denied.

**NATURE OF THE ACTION**

1. This paragraph contains legal conclusions for which no response is required.
2. This paragraph contains legal conclusions for which no response is required.

3. This paragraph contains legal conclusions for which no response is required.
4. This paragraph contains legal conclusions for which no response is required.
5. This paragraph contains legal conclusions for which no response is required. To the extent a response to factual allegations in the paragraph is required, the allegations are denied.

**PRELIMINARY ALLEGATIONS**

6. Admitted.
7. Admitted.
8. Admitted. Respondent operates a state permitted on-site landfill at its Augusta, Arkansas foundry.
9. Admitted.
10. Admitted. Respondent further avers that, based on RCRA regulations (*see* 40 C.F.R. § 261.4(c)), Respondent is not required to have a permit for the treatment, storage or disposal of hazardous waste.
11. Admitted.
12. Admitted. Respondent further avers that it treats and disposes of waste under the applicable RCRA regulations (*see* 40 C.F.R. § 261.4(c)).
13. This paragraph contains legal conclusions for which no response is required.
14. Admitted.
15. Denied. Respondent uses sand to make molds for various castings. In the process of making these molds and removing the casting from the molds, the sand comes into contact with metal castings. A certain amount of metal, including lead, is found in the sand. Sand is treated in accordance with applicable RCRA regulations and then disposed of on-site.

16. This paragraph contains legal conclusions for which no response is required. To the extent a response to factual allegations in the paragraph is required, the allegations are denied.

17. This paragraph contains legal conclusions for which no response is required. To the extent a response to factual allegations in the paragraph is required, the allegations are denied.

18. Admitted in Part. Denied in part. Respondent admits only that sand enters the Ball Mill as a solid waste and leaves as a solid waste. Respondent denies the remaining allegations of paragraph 18.

19. Admitted in Part. Denied in Part. Admitted that, generally speaking, solid waste that exhibits the "characteristic of toxicity" is hazardous waste. Respondent denies the remaining allegations of paragraph 19.

20. Denied.

21. Denied.

22. Admitted in Part. Denied in part. Admitted that Respondent manages several waste streams. Admitted that the dust collected at the Sand Plant Dust Collector and Panghorn Dust Collector is composed of small particles and fine sand. Admitted that the dust is treated and disposed of onsite. Respondent denies the remaining allegations of paragraph 22.

**Respondent's Dubious Treatment of Hazardous Waste**

23. Admitted.

24. This paragraph contains legal conclusions for which no response is required. To the extent a response to factual allegations in the paragraph is required, the allegations are denied.

25. This paragraph contains legal conclusions for which no response is required. To the extent a response to factual allegations in the paragraph is required, the allegations are denied.

26. Denied.

27. This paragraph purports to summarize 40 C.F.R. § 260.10, which speaks for itself. This paragraph further contains legal conclusions for which no response is required.

28. Admitted in Part. Denied in Part. Respondent admits that it disposes of treated and untreated sand. Respondent denies the remaining allegations of Paragraph 28.

29. The paragraph purports to characterize materials provided by Respondent to EPA in 2008, which speak for themselves and are the best evidence of their content. Any allegation contrary to the materials plain language, meaning, or context is denied.

30. The paragraph purports to characterize materials provided by Respondent to EPA in 2008, which speak for themselves and are the best evidence of their content. Any allegation contrary to the materials plain language, meaning, or context is denied.

31. Admitted in Part. Denied in Part. Admitted only that Respondent does not add water in its use of Free Flow. Respondent denies the remaining allegations of paragraph 31.

32. This paragraph contains legal conclusions for which no response is required.

33. This paragraph contains legal conclusions for which no response is required.

34. This paragraph contains legal conclusions for which no response is required.

35. This paragraph contains legal conclusions for which no response is required.

36. Admitted in Part. Denied in Part. Admitted that the EPA Region 6 Compliance Assurance and Enforcement Division Inspection Report, dated April 27, 2015, and Attachments, state that EPA inspectors collected grab samples and one composite sample. Respondent lacks sufficient knowledge or information to respond to the remaining allegations of paragraph 36 and, on that basis, denies the allegations.

37. Admitted that EPA has provided to Respondent a "Final Analytical Report" dated August 7, 2014, stating that the samples were tested by the EPA Region 6 laboratory in Houston.

38. Admitted.

### VIOLATIONS

#### Count One-Operation of a Hazardous Waste Landfill Without a Hazardous Waste Permit in Violation of the Permits Requirements of RCRA section 3005 and APC&EC Regulation No. 23 § 270 [40 C.F.R. part 270].

39. Respondent restates and incorporates all preceding paragraphs of this Answer.

40. This paragraph contains legal conclusions for which no response is required.

41. Admitted in Part. Denied in Part. Admitted that Respondent has not applied for a permit for disposing of hazardous waste or for operating a hazardous waste landfill. Respondent denies that it either disposes of hazardous waste onsite or operates a hazardous waste landfill onsite. The sand deposited in Respondent's onsite landfill is either treated to meet the Universal Treatment Standards at 40 C.F.R. § 268.48(a) or the sand is a non-hazardous waste under RCRA because it contains less than 5.0 mg/L lead.

42. Admitted in Part. Denied in Part. Admitted that EPA inspectors visited Respondent on June 24 and 25, 2014. Denied to the extent the allegation assumes and/or suggests Respondent disposes of hazardous waste on-site or operates a hazardous waste landfill on-site.

43. Admitted in Part. Denied in Part. Admitted that the active part of the landfill is approximately 20 yards wide and 50 yards long. Respondent lacks sufficient knowledge or information to admit or deny the remaining allegations of paragraph 43 and, on that basis, denies the allegations.

44. Respondent lacks sufficient knowledge to admit or deny the allegation, and on that basis, the allegation is denied.

45. Admitted.

46. Admitted in Part. Denied in Part. Admitted that the EPA Region 6 Compliance Assurance and Enforcement Division Inspection Report dated April 27, 2015, and Attachments, state that EPA inspectors collected twelve grab samples of disposed waste from ten points on the active area of the landfill. Respondent lacks sufficient knowledge or information to admit or deny the remaining allegations of paragraph 46 and, on that basis, denies the allegations.

47. Admitted in Part. Denied in Part. Admitted that the EPA Region 6 Compliance Assurance and Enforcement Division Inspection Report dated April 27, 2015, and Attachments, state that each sample was collected from the top two to four inches of the active disposal area of the landfill. Respondent lacks sufficient knowledge or information to admit or deny the remaining allegations of paragraph 47 and, on that basis, denies the allegations.

48. Admitted in Part. Denied in Part. Admitted that EPA's laboratory results provided to Respondent state that the three grab samples exceeded the regulatory limit of 5.0 mg/L of lead. Denied that the samples were collected or tested according to applicable procedures and denied that the sample results accurately reflect waste in the landfill. Analysis of samples collected by Respondent in the same areas show no exceedances of the regulatory limit.

49. Admitted in Part. Denied in Part. Admitted that EPA's laboratory results provided to Respondent state that the results were 5.50 mg/L, 6.50 mg/L, and 5.85 mg/L for samples S12, S13, and S16 respectively. Denied that the samples were collected or tested according to applicable

procedures and denied that the samples accurately reflect waste in the landfill. Respondent's analysis of samples collected in the same areas show no exceedances of the regulatory limit.

50. Admitted in Part. Denied in Part. Admitted that EPA's laboratory results provided to Respondent state a result of 4.99 mg/L for S14. Denied that the sample was collected and tested according to applicable procedures and denied that the sample result accurately reflects waste in the landfill. Respondent's analysis of a sample collected in the same area shows no exceedance of the regulatory limit.

51. Denied.

52. Denied.

53. Denied.

**Count Two-Failure to Comply with Treatment Standards Prior to Landfill Disposal in violation of APC&EC Regulation No. 23 § 268.9(c) [40 C.F.R. § 268.9(c)].**

54. Respondent restates and incorporates all preceding paragraphs of this Answer.

55. This paragraph contains legal conclusions for which no response is required.

56. This paragraph contains legal conclusions for which no response is required.

57. Admitted in Part. Denied in Part. Admitted that the EPA laboratory test results provided to Respondent by EPA state TCLP results that exceeded the numerical treatment standard of 0.75 mg/L. Denied that the treatment standard of 0.75 mg/L applies to all waste streams disposed of in the onsite landfill. Denied that the samples were collected or tested according to applicable procedures and denied that they accurately reflect the material in the landfill.

58. Admitted in Part. Denied in Part. Admitted that EPA laboratory test results for three samples collected from the active landfill state TCLP test results of more than 5.0 mg/L of lead.

Denied that the samples were collected and tested using appropriate procedures and denied that that the samples results accurately reflect waste in the landfill.

59. Admitted in Part. Denied in Part. Admitted that the EPA Region 6 Compliance Assurance and Enforcement Division Inspection Report dated April 27, 2015, and Attachments, states that one sample was designated S13 and that the sample was taken from the onsite landfill. Respondent lacks sufficient knowledge or information to admit or deny the remaining allegations of paragraph 59 and, on that basis, denies the allegations.

60. Admitted in Part. Denied in Part. Admitted that EPA inspectors collected a grab sample from Respondent's dump truck. Respondent lacks sufficient knowledge or information to admit or deny the remaining allegations of paragraph 60 and, on that basis, denies the allegations.

61. Admitted in Part. Denied in Part. Admitted that EPA inspectors collected a grab sample of sand from a dump truck and that the EPA laboratory test results provided to Respondent state a TCLP result for Sample S05 at a lead level of 1.14 mg/L. Admitted that a level of 1.14 mg/L exceeds the applicable treatment standard. Denied that the sample was collected and tested using appropriate procedures and denied that that the sample result accurately reflects waste in the dump truck. Respondent collected a sample at the same location that, when tested, had a TCLP result of 0.06 mg/L.

62. Denied.

63. Denied.

**Count-Three Failure to Operate the Facility to Minimize the Release of Hazardous Waste to Air, Soil, or Surface Water as required by APC&EC Regulation No. 23 § 265.31 [40 C.F.R. § 265.31].**

64. Respondent restates and incorporates all preceding paragraphs of this Answer.



65. This paragraph contains legal conclusions for which no response is required.

66. This paragraph contains legal conclusions for which no response is required.

67. Admitted in Part. Denied in Part. Respondent admits that its facility is a generator of hazardous waste. Respondent denies that it has failed to treat and dispose of the waste under the applicable RCRA regulations (*see* 40 C.F.R. § 261.4(c)).

68. Admitted in Part. Denied in Part. Admitted that Respondent accumulates hazardous waste onsite. Denied that Respondent is required to have a permit to do so.

69. Admitted in Part. Denied in Part. Admitted that the EPA Region 6 Compliance and Inspection Report dated April 27, 2015, and Attachments, states that EPA Inspectors visited the "North Baghouse Pad." Respondent lacks sufficient knowledge or information to admit or deny the remaining allegations of paragraph 69 and, on that basis, denies the allegations.

70. Admitted.

71. Admitted.

72. Respondent does not have sufficient knowledge to admit or deny the allegations, and on that basis, the allegations are denied.

73. Admitted that the EPA Region 6 Compliance Assurance and Enforcement Division Inspection Report dated April 27, 2015, and Attachments, state that EPA inspectors collected a multi-point composite sample from the perimeter of the North Baghouse Pad that was designated Sample S01. Respondent lacks sufficient knowledge or information to admit or deny the remaining allegations of paragraph 73 and, on that basis, denies the allegations.

74. Admitted in Part. Denied in Part. Admitted that the EPA laboratory test results provided to Respondent stated a TCLP result for Sample S01 of 72.8 mg/L. Denied that the sample

was collected and tested using appropriate procedures and denied that that the sample result accurately reflects the dirt in the area of the pad. Denied that there is an applicable regulatory level for the dirt around the pad.

75. Denied.

76. Denied.

77. Denied.

78. Denied.

**Count-Four Failure to Provide Annual Hazardous Waste Training or Maintain Records of Annual Hazardous Waste Training as Required by APC&EC Regulation No. 23 § 265.16 [40 C.F.R. § 265.16].**

79. Respondent restates and incorporates all preceding paragraphs of this Answer.

80. This paragraph contains legal conclusions for which no response is required.

81. This paragraph contains legal conclusions for which no response is required.

82. This paragraph contains legal conclusions for which no response is required.

83. This paragraph contains legal conclusions for which no response is required.

84. Admitted in Part. Denied in Part. Admitted that the facility generates hazardous waste. Denied that the facility has failed to treat and dispose of the waste under the applicable RCRA regulations (*see* 40 C.F.R. § 261.4(c)). Denied that Respondent requires permits beyond what it has for the activity it now conducts.

85. Admitted.

86. Admitted in Part. Denied in Part. Respondent admits it has been unable to produce training records for 2013. Respondent denies the remaining allegations of paragraph 86.

87. Admitted. Respondent admits it has been unable to produce training records for 2013.

88. Admitted in Part. Denied in Part. Admitted that Respondent is unable to produce training records for 2013. Respondent denies the remaining allegations of Paragraph 88.

89. Admitted in Part. Denied in Part. Respondent admits it has been unable to produce training records for 2013. Respondent denies the remaining allegations of paragraph 89.

**Count-Five Failure to Manage Containers of Hazardous Waste as Required by APC&EC Regulation No. 23 § 265.173(a) [40 C.F.R. § 265.173(a)]**

90. Respondent restates and incorporates all preceding paragraphs of this Answer.

91. This paragraph contains legal conclusions for which no response is required.

92. This paragraph contains legal conclusions for which no response is required.

93. This paragraph contains legal conclusions for which no response is required. To the extent a response to factual allegations in the paragraph is required, the allegations are denied.

94. Admitted in Part. Denied in Part. Admitted that Respondent generates hazardous waste. Denied that Respondent has failed to treat and dispose of the waste under the applicable RCRA regulations (*see* 40 C.F.R. § 261.4(c)).

95. Admitted in Part. Denied in Part. Admitted that the EPA Region 6 Compliance and Inspection Report dated April 27, 2015, and Attachments, includes pictures of open containers in the hazardous waste staging area and in the sandplant. Respondent lacks sufficient knowledge or information to admit or deny the remaining allegations of paragraph 95 and, on that basis, denies the allegations.

96. Admitted in Part. Denied in Part. Admitted that the EPA Region 6 Compliance and Inspection Report, dated April 27, 2015, and Attachments, includes pictures of open containers.

Respondent lacks sufficient knowledge or information to admit or deny the remaining allegations of paragraph 96 and, on that basis, denies the allegations.

97. This paragraph contains a legal conclusion to which no response is required.

**COMPLIANCE ORDER**

98. No response necessary.

(a) Respondent denies in its entirety the purported applicability of the language contained in 98(a). Specifically: (1) Respondent asserts that the material it places in the onsite landfill meets and will continue to meet the applicable treatment standards; (2) Respondent denies that it uses a hazardous waste treatment process that depends on post-disposal chemical stabilization reactions to render such waste non-hazardous; (3) Respondent asserts that the land disposal method it currently uses renders any waste non-hazardous and that the waste is treated to meet applicable treatment standards consistent with applicable regulations; and (4) Respondent asserts that there is no requirement in either the RCRA statute or the RCRA regulations to sample every treated waste batch prior to disposal.

(b) Respondent reserves the opportunity to negotiate the schedule and manner of compliance with this alleged requirement.

(c) Respondent reserves the opportunity to negotiate the schedule and manner of compliance with this alleged requirement.

(d) Respondent reserves the opportunity to negotiate the schedule and manner of compliance with this alleged requirement.

(e) Respondent denies that EPA may demand the actions described in subpart (e) because: (1) the material placed in the landfill since the EPA inspection on June 24, 2014 has met

all applicable regulations; (2) No permit to operate the landfill as a hazardous waste management unit is required because the unit is a fully permitted non-hazardous waste landfill and is operated as such pursuant to a valid permit; and (3) there is no need to close the landfill as no event requiring such closure has occurred and, therefore, no post closure issues are presented at this time, Accordingly, there is no need for Respondent to prepare or present to EPA the plan and schedule referenced in the last two sentences of 98(e).

(f) Respondent reserves the opportunity to negotiate the schedule and manner of compliance with the alleged requirements.

(g) Respondent acknowledges that it must submit all required information to EPA with the required certification via electronic mail and hard copy to the address provided in the Complaint.

(h) No response required.

#### **CIVIL PENALTIES**

99. Admitted in Part. Denied in Part. Admitted that Complainant accurately summarizes the RCRA penalty policy.

100. Denied that Respondent should be assessed penalties. Respondent restates and incorporates its denial of alleged material facts and explanations provided herein. Imposition of a penalty is inappropriate.

101. Admitted that Respondent bears the burden of demonstrating an inability to pay a civil penalty.

102. Paragraph 102 of the Complaint contains no factual allegations, and on that basis paragraph 102 is denied.

103. Denied that the penalties sought by Complainant are appropriate.
104. Paragraph 104 of the Complaint contains no factual allegations, and on that basis paragraph 104 is denied.
105. Admitted that Complainant is not proposing a specific penalty.
106. Denied. Respondent denies the allegations set forth in paragraph 106, subparagraphs "a" thru "d."
107. Denied. Respondent denies the allegations set forth in paragraph 107, subparagraphs "a" thru "d."
108. Denied. Respondent denies the allegations set forth in paragraph 108, subparagraphs "a" thru "c."
109. Admitted in Part. Denied in Part. Respondent admits it has been unable to produce training records for 2013. Respondent denies the remaining allegations set forth in paragraph 109, subparagraphs "a" thru "c."
110. Admitted in Part. Denied in Part. Respondent admits that EPA inspectors observed open containers of waste during their June 24-26, 2014 inspection. Respondent denies the remaining allegations set forth in paragraph 109, subparagraphs "a" thru "b."

**NOTICE OF OPPORTUNITY TO REQUEST A HEARING**

111. Respondent respectfully requests a hearing on the subject of the alleged violations set forth in this Complaint.
112. Respondent acknowledges that it must file an Answer to contest any material fact, and to challenge the proposed penalty and compliance order.

113. Respondent has provided an admission or denial of each alleged material fact, with explanation as deemed necessary.

114. Respondent has provided an admission or denial of each alleged material fact, with explanation as deemed necessary. Affirmative defenses are offered that include each denial, response or clarification in its entirety or relevant part. A list of overarching affirmative defenses is provided below. Respondent hereby re-states its request for hearing.

115. Respondent acknowledges the applicability of the Administrative Procedures Act and the Consolidated Rules of Practice to this proceeding.

116. Respondent shall send this Answer to the Regional Hearing Clerk at the address provided in the Complaint.

117. Respondent shall serve a copy of the Answer and other filed documents on counsel for Complainant as provided in the Complaint.

118. Respondent acknowledges that it must file an Answer or be deemed to have admitted all allegations made in the Complaint and waived its right to a hearing.

119. Respondent acknowledges the ex parte rules governing this proceeding.

#### **SETTLEMENT CONFERENCE**

120. Respondent requests a conference with Complainant to discuss settlement of this Complaint. Respondent seeks to discuss settlement in a professional and amicable manner.

121. Respondent acknowledges that a request for an informal settlement conference does not extend the requirement to submit an Answer and Request for Hearing.

122. Respondent acknowledges Complainant's requirements for a final settlement.

**AFFIRMATIVE DEFENSES**

**FIRST AFFIRMATIVE DEFENSE**

Respondent asserts that each denial response or clarification in its entirety or relevant part is itself an affirmative defense for the purpose (s) for which it was offered.

**SECOND AFFIRMATIVE DEFENSE**

Complainant fails to state facts sufficient to constitute a cause of action for relief against Respondent.

**THIRD AFFIRMATIVE DEFENSE**

Complainant is barred from recovery because Respondent complied with applicable permit terms, rules, regulations, and laws.

**FOURTH AFFIRMATIVE DEFENSE**

Complainant does not have authority to pursue its claims against Respondent. Complainant's jurisdiction is limited by the Resource Conservation and Recovery Act and the Occupational Safety and Health Act.

**FIFTH AFFIRMATIVE DEFENSE**

If violations occurred as alleged in the Complaint, which Respondent specifically disputes and denies, the intervening and superseding actions, and/or inactions of some other person or entity other than Respondent proximately caused such violation in whole or in part.

**SIXTH AFFIRMATIVE DEFENSE**

Respondent acted reasonably and in good faith at all times material herein, based on all relevant facts and circumstances known by it at the time it so acted.



**SEVENTH AFFIRMATIVE DEFENSE**

Complainant's investigation and Complaint are based on insufficient evidence as a matter of law. RCRA civil penalties may not be imposed based on a single sample of allegedly hazardous waste.

**EIGHTH AFFIRMATIVE DEFENSE**

Complainant's investigation and complaint are based on insufficient evidence as a matter of law. RCRA civil penalties may not be imposed based on samples taken out of conformance with applicable regulations.

**NINTH AFFIRMATIVE DEFENSE**

Complainant's investigation and complaint are based on insufficient evidence as a matter of law. RCRA civil penalties may not be imposed for conduct based on samples of material that is not regulated under RCRA.

**TENTH AFFIRMATIVE DEFENSE**

Complainant's investigation and complaint are based on insufficient evidence as a matter of law. RCRA civil penalties may not be imposed based on samples taken from the point of disposal rather than the point of generation of hazardous waste.

**ELEVENTH AFFIRMATIVE DEFENSE**

Complainant's demands for civil penalties or any other monetary relief, constitute, or are the equivalent of, a criminal or quasi-criminal sanction, constitute an excessive fine, and as such, Complainant's demands violate Sloan's rights under the United States Constitution, including without limitation, the Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments.

**TWELFTH AFFIRMATIVE DEFENSE**

The conduct of Respondent in regard to the matters alleged in the Complaint was justified, and by reason of the foregoing, Complainant is barred from recovery thereon.

**THIRTEENTH AFFIRMATIVE DEFENSE**

Respondent took all steps necessary to comply with its permit and its onsite treatment and disposal of waste complies with applicable RCRA regulations and exemptions.

**FOURTEENTH AFFIRMATIVE DEFENSE**

Complainant's failure to preserve the samples it procured during its investigation of Respondent unlawfully limits Respondent's ability to defend itself and its waste handling procedures.

**FIFTEENTH AFFIRMATIVE DEFENSE**

RCRA penalties may not be imposed because the waste deposited in the landfill is not hazardous waste.

**SIXTEENTH AFFIRMATIVE DEFENSE**

Respondent cannot fully anticipate at this time all defenses that may be applicable. Accordingly, Respondent reserves the right to assert additional defenses if and to the extent such affirmative defenses are later discovered and found to be applicable.

**REQUEST FOR HEARING**


Respondent requests a hearing on this matter.

Dated: April 29, 2016

Respectfully submitted,

DENTONS US LLP

By:

  
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of Columbia)

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Washington, DC 20006-1102

Tel: (202) 496-7573


*Attorneys for Respondent*

**CERTIFICATE OF SERVICE**

I certify that on April 29, 2016, the foregoing Answer to Complaint and Request for Hearing was hand-delivered to the Regional Hearing Clerk, U.S. EPA-Region 6, 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2733, and that a true and correct copy was sent by overnight delivery to the following:

Brian Tomasovic  
Matthew Trawick  
EPA Region 6, Office of Regional Counsel  
1445 Ross Avenue (6 RC-ER)  
Dallas, TX 75202

Thomas Rucki  
Regional Judicial Officer  
EPA Region 6, Office of Regional Counsel  
1445 Ross Avenue (6 RC-ER)  
Dallas, TX 75202

  
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Tami Lyn Azorsky