

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IX

In the matter of)	U.S. EPA Docket No.
)	RCRA 09-2015-0011
CLEAN HARBORS)	
BUTTONWILLOW, L.L.C.,)	
)	DETERMINATION OF
)	VIOLATION,
)	COMPLIANCE ORDER
)	AND NOTICE OF RIGHT TO
<u>Respondent.</u>)	REQUEST A HEARING

I. DETERMINATION OF VIOLATION

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 CFR Part 22. Complainant is the United States Environmental Protection Agency, Region IX (“EPA”). Respondent is Clean Harbors Buttonwillow, L.L.C. (“Buttonwillow” or “Respondent”), a Delaware Corporation.

2. Respondent owns and operates a hazardous waste treatment, storage and disposal facility (hereinafter the “Facility”), which occupies approximately 320 acres of land at 2500 West Lokern Road, Buttonwillow, CA 93206.

3. Respondent accepts solid and hazardous wastes from generators for onsite land disposal at the Facility.

4. RCRA hazardous waste and wastes that are regulated by the State of California as hazardous (“California hazardous wastes”) are treated (through

stabilization) prior to disposal or are shipped to an offsite treatment, storage, disposal facility if wastes cannot be treated by stabilization.

5. Respondent's RCRA permit, issued by the California Department of Toxic Substances ("DTSC") was effective on April 6, 1996 and was scheduled to expire on April 6, 2006.

6. A permit renewal application for the Facility was submitted to DTSC on October 1, 2005 by the Respondent, and is currently under review.

7. Until its permit renewal application is acted upon, Respondent operates the Facility under the terms and conditions of the expired permit (hereafter referred to as "the 1996 Permit").

8. This Determination of Violation, Compliance Order and Notice of Right to Request a Hearing ("Complaint") serves as notice that EPA, on the basis of information available to it, has determined that Respondent violated Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925, and the federally authorized California regulations adopted pursuant thereto.

9. This Complaint seeks to establish the amount of a civil penalty that Respondent must pay for violations alleged herein, and compel compliance with the compliance tasks described herein. This Complaint also provides notice of Respondent's opportunity to request a hearing.

10. 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 regulated as "hazardous wastes." These regulations are set forth at 40 CFR Part 261.

11. RCRA empowers EPA to identify and list hazardous wastes. It also authorizes EPA to regulate hazardous waste generators, transporters, 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 CFR Parts 260 to 270, 273 and 279.

12. On August 1, 1992, the State of California 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 CFR Part 271 (*see* 57 Fed. Reg. 32726, July 23, 1992). This authorization was initially updated on September 26, 2001 (*see* 66 Fed. Reg. 49118, September 26, 2001) and subsequently updated again on October 7, 2011 (*see* 76 Fed. Reg. 62303, October 7, 2011).

13. The authorized California hazardous waste management program is established pursuant to the Hazardous Waste Control Law, Chapter 6.5 of Division 20 of the California Health and Safety Code (“H&SC”), and the regulations promulgated thereunder at Title 22, Division 4.5 of the California Code of Regulations (“22 CCR”) §§ 66001 *et seq.*

14. The State of California has been authorized for all the statutory provisions and regulations referenced in this Complaint.

15. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. §6928(a), EPA may enforce federally-authorized hazardous waste programs.

16. Section 3006 of RCRA, 42 U.S.C. §6926, as amended, provides *inter alia*, that authorized state hazardous waste 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.

17. EPA alleges that Respondent failed to comply with the following requirements of Title 22 of the California Code of Regulations and certain hazardous waste permit conditions set forth in the 1996 Permit:

- a. 22 CCR §§ 66270.30(a), 66268.40(a) and 66268.50(a), (b) and (c) (*see also* 40 CFR §§ 270.30(a), 268.40(a) and 268.50(a), (b) and (c)) and Permit Condition Part II.R.1 and the Supplemental Landfill Operations Plan of the 1996 Permit (failure to properly and timely manage land disposal restricted hazardous waste).

The allegations constitute violations of Section 3001 et seq. of RCRA, 42 U.S.C. § 6921 *et seq.* and the State statutory provisions and regulations adopted pursuant to the approved California hazardous waste management program.

B. JURISDICTION

18. Respondent is a “person” as defined in H&SC Section 25118 (see also Section 1004(15) of RCRA, 42 U.S.C. § 6903(15)), and 22 CCR §§ 66260.10 and 66270.2 (see also 40 CFR §§ 260.10 and 270.2).

19. Respondent was the “owner” or “operator” of the Facility as each of those terms is defined in 22 CCR § 66260.10 (see also 40 CFR § 260.10) at the time of the violations alleged in this Complaint.

20. The Facility was a “hazardous waste facility” as defined in H&SC Section 25117.1 and 22 CCR § 66260.10 (see also the definition of “facility” at 40 CFR § 260.10) at the time of the violations alleged in this Complaint.

21. Respondent was the “owner or operator” of a facility or activity subject to regulation under H&SC chapter 6.5, as that term is defined in 22 CCR § 66260.10, at the time of the violations alleged in this Complaint.

22. Respondent was engaged in the “storage” of hazardous waste as defined in California H&SC Section 25123 (see also Section 1004(33) of RCRA, 42 U.S.C. § 6903(33)) and 22 CCR § 66260.10 (see also 40 CFR § 260.10) at the time of the violations alleged in this Complaint.

23. Respondent was engaged in the “treatment” of hazardous waste as defined in California H&SC Section 25123.5 (see also Section 1004(34) of RCRA, 42 U.S.C. § 6903(34)) and 22 CCR § 66260.10 (see also 40 CFR § 260.10) at the time of the violations alleged in this Complaint.

24. Respondent was engaged in the “disposal” of solid and hazardous waste as defined in California H&SC Section 25113 (see also Section 1004(3) of RCRA, 42

U.S.C. § 6903(3)) and 22 CCR § 66260.10 (see also 40 CFR § 260.10) at the time of the violations alleged in this Complaint.

25. Respondent was engaged in the “land disposal” of hazardous waste as defined in 22 CCR § 66260.10 (see also 40 CFR § 268.2) at the time of the violations alleged in this Complaint.

26. Respondent generated, stored, treated and/or disposed of “hazardous waste” as defined in California H&SC Section 25117 (see also Section 1004(5) of RCRA, 42 U.S.C. § 6903(5)) and 22 CCR §§ 66260.10 and 66261.3 (see also 40 CFR §§ 260.10 and 261.3) at the time of the violations alleged in this Complaint.

27. Respondent is, therefore, subject to the authorized California requirements adopted pursuant to Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925.

28. Section 3008 of RCRA, 42 U.S.C. § 6928, authorizes the EPA Administrator to issue orders assessing a civil penalty, requiring compliance immediately or within a specified time for any violation of any requirement of Subtitle C of RCRA, Section 3001 of RCRA *et seq.*, 42 U.S.C. § 6921 *et seq.*

29. From October 18 through 22, 2010, EPA conducted an inspection at the Facility to determine compliance with RCRA.

30. Based on the October 2010 inspection of the Facility and information collected by EPA thereafter, EPA determined that Respondent has violated Sections 3004 and 3005 of RCRA, 42 U.S.C. §§ 6924 and 6925.

31. Based on the October 2010 inspection and information collected by EPA thereafter, EPA determined that Respondent has violated provisions of the California hazardous waste program authorized in accordance with RCRA Section 3006, 42 U.S.C. § 6926, and provisions of the hazardous waste permit issued to the Facility owner and operator by the State of California.

32. Respondent, in violating the authorized State hazardous waste program requirements, violated RCRA, and therefore is subject to the powers vested in the EPA Administrator by Section 3008 of RCRA, 42 U.S.C. § 6928.

33. The Administrator has delegated the authority under Section 3008 of RCRA, 42 U.S.C. § 6928, to the EPA Regional Administrator for Region IX, who has redelegated this authority to the Director of the Enforcement Division.

34. The notice required by Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), has been provided to the State of California by EPA prior to the filing of this Determination of Violation, Compliance Order and Notice of Right to Request a Hearing with the Regional Hearing Clerk.

C. ALLEGED VIOLATIONS

COUNT 1

Failure to Properly and Timely Manage Land Disposal Restricted Hazardous Waste

35. Paragraphs 1 through 34, above, are incorporated herein by this reference as if they were set forth here in their entirety.

36. The 1996 Permit requires that, unless otherwise specifically provided in the 1996 Permit, the Permittee is required “to comply with the provisions of Chapter 6.5 of Division 20 of the [H&SC] and 22 CCR, Division 4.5.”

37. 22 CCR § 66270.30(a) requires that the permittee comply with all conditions of the permit. Noncompliance with a permit is a violation and is grounds for enforcement.

38. Permit Condition II.B.3. of the 1996 Permit requires that the Permittee “ensure that waste received at a hazardous waste management unit meets the acceptance criteria for that unit and any other criteria specified in the operation plan for the unit.”

39. Permit Condition Part II.B.1. of the 1996 Permit requires that the Respondent implement the Facility's Waste Analysis Plan ("WAP"). WAP Section 3.2.3.1. states: ". . . Treated waste undergoing final placement in a landfill will contain no free liquids, be non-ignitable and non-reactive, and not be restricted from land disposal as defined in 22 CCR Articles 15 and 40 and/or 40 CFR 268..."

40. 22 CCR § 66268.40(a) requires that a prohibited waste, (*i.e.*, one identified in the table "Treatment Standards for Hazardous Waste"), be land disposed only if it meets the requirements found in the table included in that regulation. Pursuant to the definitions at 22 CCR 66260.10, the term "land disposal" includes the placement of hazardous waste "in or on the land, except in a corrective action management unit, and includes, but is not limited to, placement in a landfill..."

41. Pursuant to 22 CCR § 66268.50(a), storage of hazardous waste that is restricted from land disposal is prohibited unless certain conditions are met. One of the conditions referenced in 22 CCR § 66268.50(a) is that an owner or operator of a hazardous waste treatment, storage or disposal facility "stores such wastes in tanks, containers or containment buildings solely for the purpose of the accumulation of such quantities of hazardous waste as [are] necessary to facilitate proper recovery, treatment or disposal. . ." See 22 CCR § 66268.50(a)(2).

42. Pursuant to 22 CCR § 66268.50(b), an owner or operator of a hazardous waste treatment, storage or disposal facility may store land disposal restricted hazardous waste for up to one year unless the Department of Toxic Substances Control can demonstrate that such storage was not solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.

43. Pursuant to 22 CCR § 66268.50(c), an owner or operator of a hazardous waste treatment, storage or disposal facility may store land disposal restricted hazardous waste beyond one year but they bear the burden of proving that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.

44. Permit Condition II.R.1. in the Facility's 1996 Permit establishes requirements relating to the management of hazardous waste treated at the Facility pending disposal or retreatment of the waste.

45. Permit Condition II.R.1. prohibits the Respondent from mixing waste "from more than one stabilization batch in a waste curing area prior to post-treatment verification analysis that the wastes meet all applicable land disposal restriction requirements."

46. Permit Condition II.R.1. further states that a number of conditions must be met "[i]f more than one stabilization batch of waste is stored in a waste curing area prior to post-treatment verification analysis that the wastes meet all applicable land disposal restriction requirements."

47. Pursuant to Permit Condition II.R.1., the conditions imposed on the Respondent if more than one stabilization batch of waste is stored in a waste curing area prior to post-treatment verification analysis that the wastes meet all applicable land disposal restriction requirements are as follows: (a) the waste must be stored in a waste curing bin of sufficient strength to hold waste; (b) the waste curing bins shall be constructed without gaps and be sealed and/or lined to preclude the release of waste; (c) the waste curing bins must be marked for easy identification and tracking of waste; (d) the waste curing bins must not be stacked more than one high; and (e) the waste curing bins must be securely covered with a rainproof material or securely closed.

48. Permit Condition II.R.1. states that "[f]or the purpose of this condition only, 'Bin' includes prefabricated or fabricated in place receptacles, either disposable or reusable, as described in the aforementioned [Supplemental Landfill Operations Plan]."

49. At the time of the October 2010 inspection, more than one stabilization batch of waste was placed in the waste curing area prior to post-treatment verification analysis that the wastes met all applicable land disposal restriction requirements.

50. At the time of the October 2010 inspection, the Respondent's treated waste coming from the Stabilization Treatment Unit (STU) was placed on -- and wrapped in -- plastic liners in piles atop the land-based landfill unit WMU 34 at the Facility.

51. At the time of the October 2010 inspection, approximately 76 treated waste piles were placed atop WMU 34 on top of plastic sheeting and covered with plastic sheeting and were not placed in waste curing bins.

52. At the time of the October 2010 inspection, nine hazardous waste piles had been placed atop WMU 34 and had remained there for longer than one year.

53. Based upon verification sampling analysis completed shortly after treatment of the waste, and thus known to CHB for more than a year prior to the October 2010 inspection, each of the nine piles of treated hazardous waste identified as being atop WMU 34 for over a year had failed the applicable land disposal restrictions treatment standards.

54. There was no indication at the time of the inspection -- or information produced by the Respondent since that inspection -- to demonstrate that the waste piles were being stored atop WMU 34 for the sole purpose of accumulating sufficient quantities of such wastes to facilitate proper recovery, treatment or disposal of such waste.

55. After the October 2010 inspection, Respondent produced records demonstrating that the nine piles of treated hazardous waste that had failed verification sampling for compliance with the land disposal restrictions standards and were left atop WMU 34 over a year were subsequently re-treated in the STU from October through December of 2010.

56. After verification sampling demonstrated that the piles had been successfully re-treated to meet land disposal restrictions, these nine piles were ultimately land disposed in December of 2010.

57. One of these nine treated hazardous waste piles had been placed atop WMU 34 and remained there since at least October 30, 2008.

58. The treated hazardous waste pile that had been stored atop WMU 34 since at least October 30, 2008 was retreated on or about October 23, 2010 and, after verification sampling demonstrated that the pile had been successfully re-treated to meet land disposal restrictions, was ultimately land disposed on or about December 13, 2010.

59. The hazardous waste pile that had been stored atop WMU since October 30, 2008, therefore, was stored atop WMU 34 for a total of approximately 723 days (October 30, 2008 to October 23, 2010), or approximately 358 days over one year (or, from October 30, 2009 to October 23, 2010).

60. Another hazardous waste pile stored atop WMU 34 at the time of the October 2010 inspection was initially treated on January 26, 2009 and failed verification sampling for compliance with the land disposal restriction standards for both cadmium and lead.

61. The treated hazardous waste pile that was initially treated on January 26, 2009, was re-treated in the STU on or about June 6, 2009 and verification sampling dated June 11, 2009 demonstrated that it still failed to meet the land disposal restriction standards for both cadmium and lead.

62. After the June 6, 2009 re-treatment, this treated hazardous waste pile was placed atop WMU 34 on plastic sheeting and remained there until after the October 2010 inspection.

63. The treated hazardous waste pile that was initially treated on January 26, 2009 and re-treated on June 6, 2009 was re-treated again after the October 2010 inspection, on November 1, 2010.

64. Verification sampling results obtained after the November 1, 2010 re-treatment of this pile demonstrated that it again failed to meet the RCRA land disposal restriction standards for both cadmium and lead.

65. After being treated a fourth time, on December 14, 2010, sampling results demonstrated that this hazardous waste pile had been successfully treated to meet the applicable land disposal restrictions and the pile was ultimately disposed at the Facility on or about December 30, 2010.

66. Thus, this treated hazardous waste pile had been placed atop WMU 34 without meeting applicable land disposal restriction standards and remained there from approximately June 6, 2009 until approximately November 1, 2010. During this period, this treated hazardous waste pile had been stored atop WMU 34 for a total of approximately 513 days, and was stored atop WMU 34 for approximately 148 days over a year, (*i.e.*, from June 6, 2010 to November 1, 2010).

67. In addition to the nine piles of hazardous waste stored atop WMU 34 for over a year, there were an additional 21 piles of treated hazardous waste placed on plastic sheeting on top of WMU 34 that had been there for over 45 days.

68. Therefore, EPA alleges that, by placing or storing hazardous waste, (including waste it knew exceeded applicable land disposal restrictions treatment standards), atop the landfill on -- and wrapped in -- plastic sheeting on WMU 34, and by storing land disposal restricted hazardous waste for over a year, the Respondent violated the authorized requirements of H&SC, the Facility's 1996 Permit, and RCRA, including 22 CCR §§ 66270.30(a), 66268.40(a) and 66268.50(a), (b) and (c) (see also 40 CFR §§ 270.30(a), 268.40(a) and 268.50(a), (b) and (c)), and Permit Condition Part II.R.1. of the 1996 Permit.

D. CIVIL PENALTY

69. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), as adjusted by the Debt Collection Improvement Act of 1986, *see* 40 CFR Part 19, authorizes a civil penalty of up to THIRTY-SEVEN THOUSAND, FIVE HUNDRED DOLLARS (\$37,500) per day for violations of Subtitle C of RCRA, 42 U.S.C. § 6921 *et seq.*, occurring after January 12, 2009. Therefore, Complainant requests that the Administrator assess a civil penalty against Respondent of up to \$37,500 per day, as appropriate, for each day during which a violation cited in the above listed Counts occurred or continued.

70. Count 1 - Failure to Properly and Timely Manage Land Disposal Restricted Hazardous Waste: This violation presents a moderate potential for harm to the environment and the regulatory program, and is a moderate deviation from the regulatory requirement. A multi-day component of the penalty is appropriate for this violation for at least a five year period, based on the continuing nature of the violation of the 1996 Permit requirement to use a waste curing bin within which to stage treated waste pending sampling analysis confirmation that the treatment was successful. As of the filing of this Complaint, no evidence has been presented to the EPA which would demonstrate that the Respondent has ceased the land disposal or storage of treated waste on – and wrapped in – plastic sheeting rather than in a waste curing bin. Thus, the continuing nature of the violation warrants an assessment of a five-year (1825 days) multi-day component. Any penalty assessed for this violation should also include recoupment of any economic benefit that accrued to the Respondent as a result of the violation.

II. COMPLIANCE ORDER

71. **Cease all hazardous waste management activities that fail to comply with the requirements of the Hazardous Waste Management Permit issued for the Facility by the California Department of Toxic Substances Control.**

72. Respondent shall send any submittals demonstrating compliance with this Order by email, fax, hand delivery, overnight express or certified mail to:

Richard Francis
Enforcement Division (ENF-2-2)
US Environmental Protection Agency – Region IX
Hawthorne Street
San Francisco, CA 94105

III. NOTICE OF RIGHT TO REQUEST A HEARING

A. PUBLIC HEARING

73. In accordance with Section 3008(b) of RCRA, 42 U.S.C. § 6928(b), the Compliance Order set forth herein shall become final unless Respondent files an Answer and a request for public hearing in writing no later than thirty (30) days

after the Effective Date of this Complaint with the Regional Hearing Clerk, United States Environmental Protection Agency, Region IX, 75 Hawthorne St., San Francisco, California 94105. A copy of the Answer and request for hearing and copies of all other documents relating to these proceedings filed with the Regional Hearing Clerk should be sent to Mimi Newton (ORC-3), Assistant Regional Counsel, at the same address.

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 Respondent has no knowledge of a particular factual allegation and so state, 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 fails to file a written Answer within thirty (30) days of the Effective Date of this Complaint, Respondent may be found in default. Respondent's default will constitute an admission of all facts alleged in the Complaint and a waiver of Respondent's right to a hearing.

76. If Respondent requests a public hearing, it will be held in a location determined in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation/Termination or Suspension of Permits, 40 CFR Part 22, 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 CFR 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.

77. Pursuant to 40 CFR § 22.7(c) of the Consolidated Rules of Practice, where a pleading or document is served by first class mail or commercial delivery service,

but not by overnight or same-day service, five (5) days shall be added to the time allowed by these rules for the filing of a responsive pleading or document.

B. INFORMAL SETTLEMENT

78. Whether or not Respondent requests 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.

79. 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 stipulated.

80. 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.

81. EPA encourages all parties against whom a penalty is proposed to explore the possibility of settlement. To request an informal conference, Respondent should contact Mimi Newton, ORC-3, Assistant Regional Counsel, Office of Regional Counsel, at the above address, telephone number (415) 972-3941.

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IV. EFFECTIVE DATE

82. This Proceeding is initiated by the filing of this Determination of Violation, Compliance Order and Notice of Right to Request a Hearing (“Complaint”) with the Regional Hearing Clerk. For calculation of time frames provided herein, the “Effective Date” of this Complaint is the date of Service. Service is complete when the return mail receipt is signed by the Respondent or a duly authorized representative of the Respondent, in accordance with the provisions of 40 CFR §§ 22.5(b) and 22.7(c).

Sept 30, 2015
Date


Kathleen Johnson, Director
Enforcement Division

CERTIFICATE OF SERVICE

I hereby certify that on the date below, the original copy of the foregoing Complaint, Consent Agreement and Final Order, was filed with the Regional Hearing Clerk, Region IX, and that copies were sent by:

Certified Mail, Return Receipt Requested to:

The Corporation Trust Company
Corporation Trust Center
1209 N. Orange Street
Wilmington, DE 19801

Registered Agent for Service of Process
for Clean Harbors Buttonwillow, L.L.C.

List of Documents

1. Transmittal Letter re: Determination of Violation, Compliance Order and Notice of Right to Request a Hearing
2. Determination of Violation, Compliance Order and Notice of Right to Request a Hearing ("Complaint")
3. The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits
4. Revision of Adjusted Penalty Policy Matrices Issued on November 16, 2009
5. The RCRA Civil Penalty Policy 2003

September 30, 2015

Date

Kandice Bellamy

Kandice Bellamy
Waste and Chemical Section
Enforcement Division, Region IX