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Acting Director, CALIFORNIA DEPARTMENT OF
TOXIC SUBSTANCES CONTROL*

*EXEMPT FROM FILING FEES
GOVERNMENT CODE § 6103*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

**PEOPLE OF THE STATE OF
CALIFORNIA, ex rel. Miriam Barcellona
Ingenito, Acting Director of the
CALIFORNIA DEPARTMENT OF
TOXIC SUBSTANCES CONTROL,**

Plaintiff,

v.

**FEDEX GROUND PACKAGE SYSTEM,
INC., a Delaware Corporation; and DOES
1 through 50, inclusive,**

Defendants.

Case No.
**COMPLAINT FOR PERMANENT
INJUNCTION, CIVIL PENALTIES AND
OTHER EQUITABLE RELIEF**

(Health & Saf. Code, Div. 20, Chapter 6.5)

1 Plaintiff, the People of the State of California, ex rel. Miriam Barcellona Ingenito, Acting
2 Director of the California Department of Toxic Substances Control (“DTSC”), alleges as follows:

3 **THE PARTIES**

4 1. DTSC is the state agency responsible for the administration and enforcement of the
5 Hazardous Waste Control Law (“HWCL”) and its implementing regulations. (Health & Saf.
6 Code, § 25100 et seq.; Cal. Code Regs., tit. 22, § 66260.1, et seq.) Pursuant to the provisions of
7 Health and Safety Code sections 25181 and 25182, DTSC has requested that the Attorney
8 General of the State of California commence this action for relief under the HWCL in the name of
9 the People.

10 2. Defendant FedEx Ground Package System, Inc. (“FedEx Ground”) is now, and at all
11 times mentioned in this Complaint was, a Delaware corporation that does business as a motor
12 carrier in the State of California (“California”) transporting and delivering goods throughout
13 California. FedEx Ground has its principal corporate office in Moon Township, Pennsylvania.
14 FedEx Ground utilizes thirty-four (34) permanent facilities located in California to route and
15 deliver goods across the state. DTSC is informed and believes and thereupon alleges that FedEx
16 Ground is, and at all times relevant to the claims in this Complaint was, the owner and/or operator
17 of the California Facilities.

18 3. FedEx Ground is, and at all times relevant to the claims in this Complaint was, legally
19 responsible for compliance with the provisions of the HWCL and its implementing regulations,
20 with respect to the operations of its California Facilities. DTSC is informed and believes and
21 thereupon alleges that FedEx Ground is responsible for the operations of the California Facilities,
22 that FedEx Ground controls the hazardous materials and hazardous waste management decisions
23 at the California Facilities, and that FedEx Ground took or failed to take actions that resulted in
24 the violations alleged herein.

25 4. FedEx Ground is a “person,” as defined in Health and Safety Code section 25118.

26 5. When reference is made in this Complaint to any act of FedEx Ground, such
27 allegations shall include acts of the owners, officers, directors, agents, employees, contractors,
28 affiliates, or representatives of FedEx Ground that supervise, control or direct its employees and

1 agents while engaged in the management, direction, operation or control of the affairs of the
2 business organization and did so while acting within the course and scope of employment or
3 agency of FedEx Ground.

4 6. The identities of DOES 1-25 are unknown to DTSC at this time. At such time as the
5 identities of DOE defendants become known, DTSC will amend this Complaint accordingly.
6 DOES 1-25 are, and at all times relevant to the claims in this Complaint were, legally responsible
7 for compliance with the provisions of the HWCL, and its corresponding implementing
8 regulations, in connection with the ownership and/or operation of FedEx Ground's business in
9 California, including but not limited to the California Facilities. FedEx Ground and DOES 1-25
10 are collectively referred to herein as "Defendants."

11 7. At all times relevant hereto, DOES 26-50 were in a position of responsibility allowing
12 them to influence corporate policies or activities with respect to FedEx Ground's compliance with
13 California environmental laws and regulations, and had, by reason of their position in the
14 corporation, responsibility and authority either to prevent in the first instance, or promptly to
15 correct, the violations complained of herein, but failed to do so. In addition to any direct personal
16 liability of these individuals, DOES 26-50 also are personally liable under the "responsible
17 corporate officer doctrine" for violations of law committed by FedEx Ground as alleged herein.

18 **JURISDICTION AND VENUE**

19 8. Venue is proper in this county pursuant to Health and Safety Code section 25183 in
20 that certain of the violations alleged in the Complaint occurred in the county of Sacramento and
21 that certain other statewide violations alleged in the Complaint are related to such violations.
22 This Court has jurisdiction pursuant to Health and Safety Code section 25183 and Article 6,
23 section 10 of the California Constitution.

24 9. DTSC and FedEx Ground entered into a series of agreements to toll any applicable
25 statute of limitations. As a result of these tolling agreements, the period between September 1,
26 2012 and April 25, 2014, inclusive, is excluded in computing the time limited by any statute of
27 limitations under the causes of action that may arise out of claims covered by the tolling
28 agreements. Those claims include the claims that are brought in this action.

1 issued; or that the remedy at law is inadequate, and the temporary restraining order, preliminary
2 injunction, or permanent injunction shall issue without such allegations and without such proof.

3 **GENERAL ALLEGATIONS**

4 16. Defendants conduct business in California and own and/or operate the California
5 Facilities. The California Facilities consist of three (3) hub facilities (“Hubs”) – located one each
6 in Sacramento, Los Angeles, and San Bernardino Counties – and thirty-one (31) terminal
7 facilities (“Terminals”), located throughout California.

8 17. Defendants collect, transport, and deliver packages to homes and businesses
9 throughout California. Packages arrive at a Hub and are then processed and routed to the
10 appropriate Terminal for delivery to their designated recipient. From the Terminals, packages are
11 delivered by Defendants in their vehicles to the home or business of the designated recipient of
12 the package.

13 18. The packages collected, transported, and delivered by Defendants include packages
14 that contain items constituting or including hazardous materials, such as acids, solvents, paints,
15 aerosols, cleaners, automotive fluids, insecticides, electronics, batteries, and other toxic,
16 flammable, and/or corrosive materials.

17 19. From at least November of 2008 through and including May of 2014 (the “Relevant
18 Period”), when a defective, broken, damaged, or leaking package containing hazardous materials
19 (“damaged hazardous materials package”) was discovered at a Terminal, Defendants would
20 either deliver the damaged hazardous materials package to its intended recipient, return it to its
21 original shipper after re-packing, if needed, or remove the damaged hazardous materials package
22 from its normal transportation in commerce and retain it at the terminal. Damaged hazardous
23 materials packages removed from transportation in commerce by Defendants and retained at a
24 Terminal were accumulated and stored at the Terminal for an indeterminate period of time for
25 disposition by Defendants. A damaged hazardous materials package retained by Defendants at a
26 Terminal would be placed into a salvage drum, which would also include materials used for
27 cleaning-up any spills or residues from the damaged hazardous materials package. At a later date,
28 either individually or with other similar damaged hazardous materials packages packed in salvage

1 drums, the retained damaged hazardous materials packages were transported from the Terminal to
2 one of the Hubs. Once at a Hub, Defendants would either dispose of or recycle the damaged
3 hazardous materials packages. During the Relevant Period, Defendants retained, accumulated,
4 and stored at the Terminals, and transported from the Terminals to the Hubs, at least 1,500
5 damaged hazardous materials packages in this manner.

6 20. DTSC alleges that the damaged hazardous materials packages retained, accumulated,
7 and stored by Defendants at the Terminals constituted hazardous waste regulated under the
8 HWCL and its implementing regulations. These damaged hazardous materials packages were
9 discarded by Defendants at the Terminals, as the term discarded is used in the HWCL and defined
10 in Health and Safety Code section 25124, subdivision (b), and California Code of Regulations,
11 title 22, section 66261.2, subdivision (b). The HWCL and its implementing regulations place
12 certain requirements on persons, including Defendants, who generate, store, and transport
13 hazardous waste within California. During the Relevant Period, Defendants' practice of
14 retaining, accumulating, and storing at the Terminals, and subsequently transporting to the Hubs,
15 hazardous waste, including the damaged hazardous waste materials packages, failed to comply
16 with, and was in violation of, the requirements of the HWCL and its implementing regulations
17 pertaining to the generation, handling, treatment, storage, and transportation of hazardous waste.

18 21. DTSC alleges that Defendants, and each of them, at all times during the Relevant
19 Period, caused and/or performed each of the acts and/or omissions in violation of HWCL in the
20 ownership and/or operation of the California Facilities and management of hazardous wastes as
21 alleged herein.

22
23 **FIRST CAUSE OF ACTION**
24 (Failure to Make Hazardous Waste Determination)
(Cal. Code Regs., tit. 22, § 66262.11)

25 22. DTSC realleges paragraphs 1 through 21, inclusive.

26 23. California Code of Regulations, title 22, section 66262.11 requires a person who
27 generates a waste to determine if that waste is hazardous by the methods provided in California
28 Code of Regulations, title 22, sections 66262.11, subdivisions (b) and (c).

1 24. DTSC is informed and believes and thereupon alleges that, during the Relevant
2 Period, Defendants generated a waste when a damaged hazardous materials package was retained
3 at a Terminal. Thereafter, Defendants failed to make a determination at the Terminal whether the
4 waste was a hazardous waste, in violation of California Code of Regulations, title 22, section
5 66262.11.

6 25. Each failure to make a hazardous waste determination of hazardous waste generated
7 at a Terminal, including damaged hazardous materials packages, subjects Defendants to a penalty
8 of up to \$25,000 for each separate violation, according to proof at trial, pursuant to Health and
9 Safety Code sections 25189, subdivision (b), or 25189.2, subdivision (b).

10 26. DTSC is further entitled to injunctive relief to abate existing violations and prevent
11 future violations of the HWCL and its implementing regulations.

12 **SECOND CAUSE OF ACTION**
13 (Failure to Obtain Identification Number)
14 (Cal. Code Regs., tit. 22, § 66262.12, subd. (a))

15 27. DTSC realleges Paragraphs 1 through 26, inclusive.

16 28. California Code of Regulations, title 22, section 66262.12, subdivision (a), prohibits a
17 generator of hazardous waste from, among other things, storing, transporting, or offering for
18 transportation a hazardous waste without having received a state or federal identification number,
19 as defined in California Code of Regulations, title 22, section 66260.10.

20 29. DTSC is informed and believes and thereupon alleges that, during the Relevant
21 Period, Defendants generated a hazardous waste when a damaged hazardous materials package
22 was retained at a Terminal. Defendants then stored that hazardous waste at the Terminal and
23 subsequently offered the hazardous waste for transportation and transported it to a Hub.
24 Defendants did so without receiving a state or federal identification number for the Terminals, in
25 violation of California Code of Regulations, title 22, sections 66262.12, subdivision (a).

26 30. Defendants' failure to obtain a state or federal identification number for each
27 Terminal where it stored, transported, or offered for transportation hazardous waste subjects
28

1 Defendants to a penalty of up to \$25,000 for each separate violation, according to proof at trial,
2 pursuant to Health and Safety Code sections 25189, subdivision (b), or 25189.2, subdivision (b).

3 31. DTSC is further entitled to injunctive relief to abate existing violations and prevent
4 future violations of the HWCL and its implementing regulations.

5 **THIRD CAUSE OF ACTION**

6 (Failure to Mark Containers of Hazardous Waste)
7 (Cal. Code Regs., tit. 22, §66262.32, subd. (b)(2))

8 32. DTSC realleges Paragraphs 1 through 31, inclusive.

9 33. California Code of Regulations, title 22, section 66262.32, subdivision (b)(2),
10 requires a generator of hazardous waste to mark each container of 119 gallons or less of
11 hazardous waste, before transporting or offering to transport such containers, with certain
12 information, including, but not limited to, the generator's name and address, the generator's state
13 or federal identification number, and the manifest tracking number.

14 34. DTSC is informed and believes and thereupon alleges that, during the Relevant
15 Period, Defendants transported or offered to transport hazardous waste, including damaged
16 hazardous materials packages, in containers of 119 gallons or less, from the Terminals to the
17 Hubs without properly marking the containers as required by California Code of Regulations,
18 title 22, section 66262.32, subdivision (b)(2), and thus in violation of that section and subdivision.

19 35. Each failure to properly label containers of hazardous waste prior to transporting, or
20 offering for transportation, from the Terminals subjects Defendants to a penalty of up to \$25,000
21 for each separate violation, according to proof at trial, pursuant to Health and Safety Code
22 sections 25189, subdivision (b), or 25189.2, subdivision (b).

23 36. DTSC is further entitled to injunctive relief to abate existing violations and prevent
24 future violations of the HWCL and its implementing regulations.

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1 **FOURTH CAUSE OF ACTION**

2 (Unlawful Transportation of Hazardous Waste – Failure to Obtain Valid Registration)
3 (Health & Saf. Code, § 25163, subd. (a)(1))

4 37. DTSC realleges paragraphs 1 through 36, inclusive.

5 38. Health and Safety Code section 25163, subdivision (a)(1), prohibits the transportation
6 of hazardous waste without a valid registration from DTSC.

7 39. DTSC is informed and believes and thereupon alleges that, during the Relevant
8 Period, Defendants transported hazardous waste, including damaged hazardous materials
9 packages, from the Terminals to the Hubs without a valid registration from DTSC, in violation of
10 Health and Safety Code section 25163, subdivision (a)(1). DTSC is also informed and believes
11 and thereupon alleges that, during the Relevant Period, Defendants transferred hazardous waste to
12 a transporter without valid registration from DTSC, in violation of Health and Safety Code
13 section 25163, subdivision (a)(1).

14 40. Each act of transportation of hazardous waste without a valid registration from DTSC
15 and each act of transferring hazardous waste to a transporter without valid registration from
16 DTSC subjects Defendants to a penalty of up to \$25,000 for each separate violation, according to
17 proof at trial, pursuant to Health and Safety Code sections 25189, subdivision (b), or 25189.2,
18 subdivision (b).

19 41. DTSC is further entitled to injunctive relief to abate existing violations and prevent
20 future violations of the HWCL and its implementing regulations.

21 **FIFTH CAUSE OF ACTION**

22 (Unlawful Transportation of Hazardous Waste – Failure to Use Manifest Before Transportation)
23 (Health & Saf. Code, § 25160, subd. (b)(1))
24 (Cal. Code Regs., tit. 22, § 66262.20)

25 42. DTSC realleges paragraphs 1 through 41, inclusive.

26 43. Health and Safety Code section 25160, subdivision (b)(1), prohibits a person
27 generating hazardous waste from transporting, or submitting for transportation, hazardous waste
28 without completing a Uniform Hazardous Waste Manifest prior to the time that the hazardous
waste is transported or offered for transportation. California Code of Regulations, title 22,

1 section 66262.20 requires a generator who transports, or offers to transport, hazardous waste to
2 prepare a Uniform Hazardous Waste Manifest.

3 44. DTSC is informed and believes and thereupon alleges that, during the Relevant
4 Period, Defendants transported or submitted for transportation from the Terminals to the Hubs
5 hazardous waste, including damaged hazardous materials packages, without completing a
6 Uniform Hazardous Waste Manifest prior to the time that the hazardous waste was transported, or
7 offered for transportation, in violation of Health and Safety Code section 25160, subdivision
8 (b)(1), and California Code of Regulations, title 22, section 66262.20.

9 45. Each act of transportation, or submitting for transportation, hazardous waste without
10 completing a Uniform Hazardous Waste Manifest prior to the time that the hazardous waste is
11 transported or offered for transportation, subjects Defendants to a penalty of up to \$25,000 for
12 each separate violation, according to proof at trial, pursuant to Health and Safety Code sections
13 25189, subdivision (b), or 25189.2, subdivision (b).

14 46. DTSC is further entitled to injunctive relief to abate existing violations and prevent
15 future violations of the HWCL and its implementing regulations.

16 **SIXTH CAUSE OF ACTION**

17 (Unlawful Transportation of Hazardous Waste – Failure to Use Manifest During Transportation)
18 (Health & Saf. Code, § 25160, subd. (d)(1))
19 (Cal. Code Regs., tit. 22, § 66263.20)

20 47. DTSC realleges paragraphs 1 through 46, inclusive.

21 48. Health and Safety Code section 25160, subdivision (d)(1), requires a person who
22 transports a hazardous waste to have a Uniform Hazardous Waste Manifest in possession while
23 transporting the hazardous waste. California Code of Regulations, title 22, section 66263.20
24 prohibits a transporter from accepting hazardous waste from a generator unless it is accompanied
25 by a completed and signed Uniform Hazardous Waste Manifest.

26 49. DTSC is informed and believes and thereupon alleges that, during the Relevant
27 Period, Defendants transported from the Terminals to the Hubs hazardous waste, including
28 damaged hazardous materials packages, without possessing a Uniform Hazardous Waste Manifest
during each transport, in violation of Health and Safety Code section 25160, subdivision (d)(1).

1 Further, Defendants transported hazardous waste without being in possession of a Uniform
2 Hazardous Waste Manifest, in violation of California Code of Regulations, title 22,
3 section 66263.20.

4 50. Each act of transportation of hazardous waste without having in possession a Uniform
5 Hazardous Waste Manifest, and each act of accepting hazardous waste for transportation without
6 an accompanying Uniform Hazardous Waste Manifest, subjects Defendants to a penalty of up to
7 \$25,000 for each separate violation, according to proof at trial, pursuant to Health and Safety
8 Code sections 25189, subdivision (b), or 25189.2, subdivision (b).

9 51. DTSC is further entitled to injunctive relief to abate existing violations and prevent
10 future violations of the HWCL and its implementing regulations.

11
12 **SEVENTH CAUSE OF ACTION**
13 (Delivery of Hazardous Waste to Unauthorized Location)
14 (Cal. Code Regs., § 66263.23, subdivision (b))

14 52. DTSC realleges Paragraphs 1 through 51, inclusive.

15 53. California Code of Regulations, title 22, section 66263.23, subdivision (b), prohibits a
16 transporter of hazardous waste from delivering hazardous waste to any location other than a
17 hazardous waste facility that has an appropriate and valid Hazardous Waste Facility Permit or is
18 otherwise authorized by DTSC to receive the hazardous waste.

19 54. DTSC is informed and believes and thereupon alleges that, during the Relevant
20 Period, Defendants transported from the Terminals and delivered to the Hubs hazardous waste,
21 including damaged hazardous materials packages, without the Hubs having an appropriate and
22 valid Hazardous Waste Facility Permit or otherwise being authorized by DTSC to receive the
23 hazardous waste, in violation of California Code of Regulations, title 22, section 66263.23,
24 subdivision (b).

25 55. Each act of transportation of hazardous waste to an unauthorized location subjects
26 Defendants to a penalty of up to \$25,000 for each separate violation, according to proof at trial,
27 pursuant to Health and Safety Code sections 25189, subdivision (b), or 25189.2, subdivision (b).
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1 56. DTSC is further entitled to injunctive relief to abate existing violations and prevent
2 future violations of the HWCL and its implementing regulations.

3 **EIGHTH CAUSE OF ACTION**

4 (Acceptance of Hazardous Waste at Unauthorized Location)
5 (Health & Saf. Code., § 25201, subdivision (a))

6 57. DTSC realleges Paragraphs 1 through 56, inclusive.

7 58. Health and Safety Code section 25201, subdivision (a), prohibits, among other things,
8 the acceptance of hazardous waste at a facility unless the owner or operator holds a Hazardous
9 Waste Facility Permit or other grant of authorization from DTSC.

10 59. DTSC is informed and believes and thereupon alleges that, during the Relevant
11 Period, Defendants accepted at the Hubs hazardous waste, including damaged hazardous
12 materials packages, without the Hubs holding a Hazardous Waste Facility Permit or other grant of
13 authorization from DTSC to accept the hazardous waste, in violation of Health and Safety Code
14 section 25201, subdivision (a).

15 60. Each act of acceptance of hazardous waste at an unauthorized location subjects
16 Defendants to a penalty of up to \$25,000 for each separate violation, according to proof at trial,
17 pursuant to Health and Safety Code sections 25189, subdivision (b), or 25189.2, subdivision (b).

18 61. DTSC is further entitled to injunctive relief to abate existing violations and prevent
19 future violations of the HWCL and its implementing regulations.

20 **NINTH CAUSE OF ACTION**

21 (Intentional Storage of Hazardous Waste at Unauthorized Location)
22 (Health & Saf. Code., § 25189, subdivision (e))

23 62. DTSC realleges Paragraphs 1 through 61, inclusive.

24 63. Health and Safety Code section 25189, subdivision (e), prohibits the intentional
25 treatment or storage, or causing the treatment or storage, of hazardous waste at a point not
26 authorized under the HWCL.

27 64. DTSC is informed and believes and thereupon alleges that, during the Relevant
28 Period, Defendants intentionally stored, or caused the storage of, hazardous waste, including

1 damaged hazardous materials packages, at the Hubs, which were and are not authorized by DTSC
2 to store hazardous waste. Defendants intentionally stored, or caused the storage of, hazardous
3 waste at points not authorized by DTSC, in violation of Health and Safety Code section 25189,
4 subdivision (e).

5 65. Each act of intentionally storing, or causing the storage of, hazardous waste at an
6 unauthorized location subjects Defendants to a penalty of up to \$25,000 for each separate
7 violation, according to proof at trial, pursuant to Health and Safety Code sections 25189,
8 subdivision (e).

9 66. DTSC is further entitled to injunctive relief to abate existing violations and prevent
10 future violations of the HWCL and its implementing regulations.

11 **TENTH CAUSE OF ACTION**

12 (Negligent Storage of Hazardous Waste at Unauthorized Location)
13 (Health & Saf. Code., § 25189, subdivision (e))

14 67. DTSC realleges Paragraphs 1 through 66, inclusive.

15 68. Health and Safety Code section 25189, subdivision (e), prohibits the negligent
16 treatment or storage, or causing the treatment or storage, of hazardous waste at a point not
17 authorized under the HWCL.

18 69. DTSC is informed and believes and thereupon alleges that, during the Relevant
19 Period, Defendants negligently stored, or caused the storage of, hazardous waste, including
20 damaged hazardous materials packages, at the Hubs, which were and are not authorized by DTSC
21 to store hazardous waste. Defendants negligently stored, or caused the storage of, hazardous
22 waste at a point not authorized by DTSC, in violation of Health and Safety Code section 25189,
23 subdivision (e).

24 70. Each act of negligently storing, or causing the storage of, hazardous waste at a point
25 not authorized by DTSC subjects Defendants to a penalty of up to \$25,000 for each separate
26 violation, according to proof at trial, pursuant to Health and Safety Code sections 25189,
27 subdivision (e).

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1 71. DTSC is further entitled to injunctive relief to abate existing violations and prevent
2 future violations of the HWCL and its implementing regulations.

3 **ELEVENTH CAUSE OF ACTION**

4 (Strict Liability for Storage of Hazardous Waste at Unauthorized Location)
5 (Health & Saf. Code., § 25189.2, subdivision (d))

6 72. DTSC realleges Paragraphs 1 through 71, inclusive.

7 73. Health and Safety Code section 25189.2, subdivision (d), provides strict liability for
8 treatment or storage, or causing the treatment or storage, of hazardous waste at a point not
9 authorized under the HWCL.

10 74. DTSC is informed and believes and thereupon alleges that, during the Relevant
11 Period, Defendants stored, or caused the storage of hazardous waste, including damaged
12 hazardous materials packages, at the Hubs, which were and are not authorized by DTSC to store
13 hazardous waste. Defendants stored, or caused the storage of, hazardous waste at points not
14 authorized by DTSC, in violation of Health and Safety Code section 25189.2, subdivision (d).

15 75. Each act of storage, or causing the storage, of hazardous waste at an unauthorized
16 location subjects Defendants to a penalty of up to \$25,000 for each separate violation, according
17 to proof at trial, pursuant to Health and Safety Code sections 25189.2, subdivision (d).

18 76. DTSC is further entitled to injunctive relief to abate existing violations and prevent
19 future violations of the HWCL and its implementing regulations.

20 **PRAYER FOR RELIEF**

21 DTSC requests that the Court grant the following relief:

22 1. A permanent injunction requiring Defendants, and each of them, to comply with those
23 provisions of the HWCL and its implementing regulations, which Defendants, and each of them,
24 violated;

25 2. Civil penalties against Defendants, and each of them, pursuant to Health and Safety
26 Code section 25189, subdivisions (b), (c), (d), and (e) in an amount according to proof.

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1 3. Civil penalties against Defendants, and each of them, pursuant to section Health and
2 Safety Code 25189.2, subdivisions (b) and (d), in an amount according to proof;

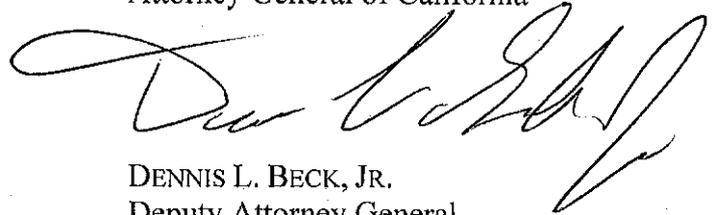
3 4. DTSC's costs; and,

4 5. Such other and further relief as the Court deems just and proper.

5 Dated: June 25, 2014

Respectfully Submitted,

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7 KAMALA D. HARRIS
Attorney General of California

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