



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control



Gavin Newsom
Governor

Meredith Williams, Ph.D.
Acting Director
1001 "I" Street
P.O. Box 806
Sacramento, California 95812-0806

September 27, 2019

Certified Mail No.: 7018-0680-0000-9827-9508

Mr. Richard Renfro
California Oil Transfer, LLC
5300 Claus Road, Building 11
Modesto, California 95357

NOTICE OF PROVISIONAL INSPECTION VIOLATION SCORES, 2019 FACILITY VIOLATION SCORING PROCEDURE SCORE, AND 2019 COMPLIANCE TIER ASSIGNMENT

Dear Mr. Richard Renfro:

2019 Facility Violations Scoring Procedure (VSP) Score: 66.00
2019 Compliance Tier Assignment: Unacceptable

The purpose of this letter is to provide California Oil Transfer LLC, CAL000190816, located at 5300 Claus Rd., Building 11, Modesto, CA 95357 (hereinafter, the "Facility") with a provisional inspection violation score for each compliance inspection that was conducted during the preceding ten (10) year period beginning January 1, 2009, through December 31, 2018, the Facility's 2019 VSP Score, and compliance tier assignment pursuant to California Code of Regulations (CCR), title 22, section 66271.53, subdivision (b)(2) and section 66271.54, subdivisions (c).¹

The provisional inspection violation scores for the Facility are provided in the enclosed Inspection Violation Scoring Matrix. A provisional inspection violation score is the sum of the initial score for each Class I violation that occurred during a compliance inspection, and any adjustment to the initial Class I violation score based on repeat violations.² (See 22 CCR § 66271.53, subd. (a).) The basis for the score for each Class I violation is also provided in the enclosed Inspection Violation Scoring Matrix.

¹ Pursuant to Senate Bill (SB) 673 (Stats. 2015, chapter 611), the Department of Toxic Substances Control (DTSC) adopted new hazardous waste permitting criteria regulations, which became effective on January 1, 2019. The full text of the hazardous waste permitting criteria regulations is available at https://www.dtsc.ca.gov/LawsRegsPolicies/Regs/upload/18-DTSC-SB-673-Reg-TEXT_OAL_20181023-revised.pdf. More information regarding SB 673 is available at https://www.dtsc.ca.gov/HazardousWaste/Permit_Roundtables.cfm.

² For purposes of calculating a facility's inspection violation score, DTSC may also consider Class II violations that meet the definition of a Class I violation as specified in CCR, title 22, section 66260.10. (See 22 CCR § 66271.50, subd. (d)(1).)

Based on the provisional inspection violation scores for the Facility for the ten (10) year period beginning January 1, 2009, through December 31, 2018, DTSC has calculated a Facility VSP Score for the Facility of **"66.00"**. A Facility VSP Score is the sum of all provisional or final inspection violation scores for each compliance inspection conducted during the preceding ten (10) years, divided by the number of compliance inspections. (See 22 CCR § 66271.54, subd. (a).)

A facility may be assigned to one of three compliance tiers based on its Facility VSP Score:

- "Acceptable." A facility that receives a Facility VSP Score of less than 20 shall be designated as having a Facility VSP Score that is "acceptable". (See 22 CCR § 66271.54, subd. (b)(1).)
- "Conditionally Acceptable." A facility that receives a Facility VSP Score equal to or greater than 20 and less than 40 shall be designated as having a Facility VSP Score that is "conditionally acceptable." Facilities that receive a final compliance tier assignment of "conditionally acceptable" are required to comply with additional requirements outlined in the regulations. (See 22 CCR § 66271.54, subd. (b)(2); 22 CCR § 66271.56.)
- "Unacceptable." A facility that receives a Facility VSP Score equal to or greater than 40 shall be designated as having a Facility VSP Score that is "unacceptable." DTSC is required to initiate permit denial, suspension, or revocation proceedings for facilities that receive a final compliance tier assignment of "unacceptable." (See 22 CCR § 66271.54, subd. (b)(3); 22 CCR § 66271.57.)

As a result of the Facility's VSP Score, DTSC has assigned the Facility to a compliance tier of **"Unacceptable"**. Generally, as discussed further below, a facility's compliance tier assignment becomes final after all provisional inspection violation scores upon which the Facility VSP Score is based become final pursuant to CCR, title 22, section 66271.53, subdivision (d).

Provisional Inspection Violation Score Disputes and Compliance Tier Assignment Challenges

An owner or operator of a facility may dispute a provisional inspection score pursuant to CCR, title 22, section 66271.53, subdivision (c) by filing a Provisional Inspection Violation Score Dispute Document (template available at <https://dtsc.ca.gov/violations-scoring-procedure/>) within sixty (60) calendar days of this notice. All of the following information must be enclosed with the Dispute Document cover letter:

- A statement that describes in detail the factual and legal basis of the dispute and the relief sought;
- Any claimed erroneous facts, assumptions, approaches, or conclusions of law made by DTSC;

- A statement describing in detail any efforts already made by the owner or operator to resolve the dispute with DTSC; and
- Any photographs, documents, or any other material that supports the owner's or operator's position regarding the disputed provisional inspection violation score.

The owner or operator of a facility may request a one-time extension of up to sixty (60) calendar days to submit a Provisional Inspection Violation Score Dispute Extension Document (template available at <https://dtsc.ca.gov/violations-scoring-procedure/>).

DTSC will issue a written decision, granting or denying, in whole or in part, the relief sought by the owner or operator of a facility disputing a provisional inspection violation score. A provisional inspection violation score will become the final inspection violation score consistent with DTSC's written decision. A provisional inspection violation score will also become the final inspection violation score if the owner or operator of a facility does not file a Dispute Document within sixty (60) calendar days of this notice.

A facility's compliance tier assignment becomes final after all inspection violation scores upon which the Facility VSP Score is based become final pursuant to CCR, title 22, section 66271.53, subdivision (d). Final compliance tier assignments of "acceptable" or "conditionally acceptable" are not subject to additional administrative dispute resolution. (See 22 CCR § 66271.54, subds. (e), (f).) However, owners or operators of facilities assigned to a final compliance tier of "unacceptable" may further administratively challenge their final compliance tier assignment under California Code of Regulations, title 22, section 66271.57.

Issuance of this provisional inspection violation score, Facility 2019 VSP Score, and compliance tier assignment do not constitute an enforcement action. If you have any questions regarding this notice, please contact VSP_Info@dtsc.ca.gov. If you have any questions regarding the dispute process, please contact VSP_Dispute_Inbox@dtsc.ca.gov.

Sincerely,



Keith Kihara, Chief
Enforcement and Emergency Response Division

Enclosure(s)

Violation Scoring Matrix
Proof of Service

Violation Scoring Matrix

Facility Name:		CALIFORNIA OIL TRANSFER LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		12/12/2017		Link to EnviroStor	
Address:		5300 CLAUS ROAD, RIVERBANK, CA 95357		Number of Inspections:		2		Permit Expiration Date:		12/11/2027		(Inspection Reports, SOVs,	
EPA ID:		CAL000190816		Total Number of Violations Scored:		12		Date VSP Completed:		8/15/2019		etc.)	
Inspection Date:	8/20/2012	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a) and HWFP, Part II, Special Conditions E and F	The facility received drums and totes of used oil and oily water from off-site sources and transferred these containers to railcars on 40 different dates and 143 different manifests in 2010 and on two different dates and 11 different manifests in 2011.	Minimal	Used oil and oily water in drums and totes were received and the total volume in violation was not specified. Used oil and oily water represented a minimal threat to human health and the environment.	Major	154 manifests in 2010 and 2011 were cited in violation. Transfer of wastes from drums and totes to railcars was not a permitted activity and demonstrated that the function of the HW management requirement was rendered ineffective.	15	No	n/a	0	15.00
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or perform emergency clean-up operation or other corrective action for releases.	22 CCR 66264.16(a-c) and (d)	The facility's training plan did not include procedures on how to handle, inspect, and repair specific equipment located within the facility. The training plan did not mention specific procedures that would be reviewed in annual update trainings. Records documenting specific annual trainings given to employees were also not available for review.	Minimal	An inadequate training plan and staff training could lead to increased threats to public health and the environment due to potential waste mismanagement and inadequate spill / release response. The permitted wastestreams of used oil, used antifreeze, and oily water represented a minimal threat to human health and the environment.	Major	The training plan was a one page document that provided general guidance (in bullet point form) on training to be conducted, and stated that an annual review would be done. The onsite training plan available for review was not approved by DTSC when initially authorized under its HWFP. Records documenting trainings completed were not available for review. The HW management requirement was wholly ignored as to deprive the public of any of the protective benefits intended by the requirements.	15	No	n/a	0	15.00
Provisional Inspection Violation Score:													30.00

Violation Scoring Matrix

Facility Name:		CALIFORNIA OIL TRANSFER LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		12/12/2017		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		5300 CLAUS ROAD, RIVERBANK, CA 95357		Number of Inspections:		2		Permit Expiration Date:		12/11/2027			
EPA ID:		CAL000190816		Total Number of Violations Scored:		12		Date VSP Completed:		8/15/2019			
Inspection Date:	6/23/2016 CEI, 2/28/2017 FUI & 9/23/2016 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66270.30(a)	The epoxy coating used as secondary containment on the concrete vertical and horizontal surfaces in the facility's permitted truck containment area was found to be chipped, eroded, and not structurally sound.	Minimal	The permit states that in the event that cracks, gaps, or tears are detected in the secondary containment system areas, repairs shall be initiated as soon as possible and completed within one week of discovery. By not maintaining the epoxy coating in the permitted truck containment area, there was an increased potential for a release to occur that could harm human health and the environment. The permitted wastestreams of used oil, used antifreeze, and oily water represented a minimal threat to human health and the environment.	Moderate	The HWFP described that the horizontal and vertical surfaces of the truck containment area were to be coated with two coats of flexible epoxy. DTSC inspectors noted that, "[i]n many areas it appeared as if there was once an epoxy lining but it has since been eroded or chipped away and what appeared to be the coarse underlying aggregate was showing." The railcar area and container storage areas were not cited as being in violation. The act deviated from the requirement, but the requirement functioned to some extent.	6	No	n/a	0	6.00
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to assure early detection of releases.	22 CCR 66264.15 and 22 CCR 66270.30(a)	The facility failed to properly identify and log problems and deficiencies with the condition of the facility's containment area, as well as general cleanliness / presence of any spills in the containment area.	Minimal	Failure to properly identify and log problems and deficiencies with the facility's containment area increased the potential for a problem / issue to go unresolved and result in a potential release that could impact human health and the environment. The permitted wastestreams of used oil, used antifreeze, and oily water represented a minimal threat to human health and the environment.	Moderate	A review of the facility's daily logs revealed that the deterioration to the secondary containment, as well as leaks and spills, or evidence of older leaks and spills, were not noted. The duration / timeframe over which the violation occurred was not specified in the inspection report. However, the facility completed its daily logs, so while the act deviated from the requirement, the requirement functioned to some extent.	6	No	n/a	0	6.00
	3	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or perform emergency clean-up operation or other corrective action for releases.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility stored used oil in a manner that deviated from what was specified in its HWFP. The facility stored a railcar (#TCIX 25031) containing 24,216 gallons of used oil outside the railcar secondary containment area. The railcar had been relocated out of the secondary containment area after it was filled. At the time of the inspection the manifest had not been signed or dated by the transporter, and therefore custody of the waste had not yet been transferred to the transporter.	Minimal	Because the facility stored 24,216 gallons of used oil outside of the railcar secondary containment area, there was an increased potential for spills or releases which could impact public health and the environment. Used oil was cited in violation, and the wastestream represented a minimal threat to human health and the environment.	Moderate	According to the HWFP, HW management activities, including the storage of waste in railcars, were only to be conducted in the secondary containment inside Building 11. A majority of the storage and transfer activities occurred in the permitted secondary containment area demonstrating that the requirement functioned to some extent.	6	No	n/a	0	6.00

Violation Scoring Matrix

Facility Name:		CALIFORNIA OIL TRANSFER LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		12/12/2017		Link to EnviroStor	
Address:		5300 CLAUS ROAD, RIVERBANK, CA 95357		Number of Inspections:		2		Permit Expiration Date:		12/11/2027		(Inspection Reports, SOVs,	
EPA ID:		CAL000190816		Total Number of Violations Scored:		12		Date VSP Completed:		8/15/2019		etc.)	
4	<p>The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.</p>	<p>HSC 25201(a) and 22 CCR 66270.30(a)</p>	<p>The facility illegally disposed used absorbent pads contaminated from cleaning up spills and leaks of used oil onsite. Absorbent pads and towels contaminated with used oil were found in the facility's plastic trash can adjacent to the office on the raised center portion inside Building II. The facility's HWFP, Part II, subsection C of the special conditions section, states that the facility shall not engage in the disposal of HW at the facility.</p>	Minimal	<p>One plastic trash can with used absorbent pads and towels contaminated with used oil represented a minimal threat to human health and the environment.</p>	Minimal	<p>According to the facility, HW transporters disposed of their used absorbent pads and contaminated towels in the facility's trash bin. One trash can of illegally disposed HW used oil on absorbent pads or towels deviated in a minor way from the requirement, as the HW management requirement functioned nearly as intended.</p>	2	No	n/a	0	2.00	
	<p>The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or perform emergency clean-up operation or other corrective action for releases.</p>	<p>22 CCR 66270.30(a)</p>	<p>The facility accumulated a greater volume of HW onsite than allowed by its HWFP. According to the facility's Railcar Capacity Calculation logs for the three railcars onsite at the time of the inspection, the facility had accumulated 59,755 gallons at the facility, which exceeded the 50,000 gallon capacity limits in the facility's HWFP, subsection X of the special conditions section. Two additional instances were also cited after a manifest review in 2017.</p>	Minimal	<p>An exceedance of 9,755 gallons (in the first instance) of used oil over the permitted capacity distributed between three railcars represented a minimal threat to human health and the environment. The volume in exceedance for the additional two instances was not provided.</p>	Moderate	<p>An exceedance of 9,755 gallons (in the first instance) of used oil over the permitted capacity (approximately 20%) as well as two additional instances cited demonstrated that the requirement functioned to some extent, although not all of its important provisions were complied with.</p>	6	No	n/a	0	6.00	
	<p>The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.</p>	<p>22 CCR 66270.30(a)</p>	<p>The facility commingled two wastestreams (oily water and antifreeze). Sample results for the combined truck samples tested positive for the presence of antifreeze even though the trucks were used to ship oily water.</p>	Minimal	<p>Comingling of oily water and antifreeze did not increase the threat to human health or the environment. Ethylene glycol (antifreeze), used oil, and oily water represented a minimal threat to human health and the environment.</p>	Major	<p>The facility's HWFP prohibited the comingling of different wastestreams and requires each wastestream to be managed separately. The function of the HW management requirement was rendered ineffective because some of its provisions were not complied with.</p>	15	No	n/a	0	15.00	

Violation Scoring Matrix

Facility Name:		CALIFORNIA OIL TRANSFER LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		12/12/2017		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		5300 CLAUS ROAD, RIVERBANK, CA 95357		Number of Inspections:		2		Permit Expiration Date:		12/11/2027			
EPA ID:		CAL000190816		Total Number of Violations Scored:		12		Date VSP Completed:		8/15/2019			
7	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility and/or perform emergency clean-up operation or other corrective action for releases.	22 CCR 66270.30(a)	The facility accepted and transferred RCRA HW (oily water contaminated with halogenated solvents) in violation of its HWFP. The facility's HWFP only authorizes the facility to receive, transfer, and store non-RCRA wastestreams (used oil, oily water, and antifreeze).	Moderate	A railcar with oily water was sampled and found to contain total organic halides at a concentration of 1,500 parts per million, which is a RCRA waste. If used oil contained greater than 1,000 parts per million of total halogens, the wastestream was no longer considered used oil and should then considered a RCRA waste. The volume and wastestream in violation represented a moderate threat to public health and the environment since the facility was not permitted to receive, store, or transfer RCRA HW.	Major	The facility's HWFP prohibited the receipt and management of RCRA wastestreams. The function of the HW management requirement was rendered ineffective because some of its provisions were not complied with.	20	No	n/a	0	20.00	
8	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility failed to store containers used to accumulate HW in the permitted container storage area. Containers were stored in an area used for truck containment that was not permitted for container storage.	Minimal	Two 55-gallon containers of oily waste, estimated at one-quarter to one-half full, as well as multiple smaller 5-gallon buckets containing various amounts of oily waste were placed in two secondary containment trays and cited in violation. Oily waste was cited in violation and represented a minimal threat to human health and the environment.	Moderate	All cited wastes were stored in the permitted truck containment area that had secondary containment. The truck containment area was a permitted storage unit with secondary containment. However, not all of the important provisions were complied with as multiple instances were cited in violation.	6	No	n/a	0	6.00	
9	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or perform emergency clean-up operation or other corrective action for releases.	HSC 25202(a)	The facility stored used oil in a manner that deviated from what was specified in its HWFP on 140 separate occasions by relocating filled railcars to an uncontained outdoor area adjacent to the facility for various time periods prior to transfer and acceptance by a registered HW transporter. According to the facility's HWFP, storage of HW is to be conducted in the secondary containment area inside Building 11 and shall not occur in any other location of the facility.	Moderate	Used oil stored in 140 separate filled railcars was cited in violation. The volume of waste cited in violation represented a moderate threat to human health and the environment.	Major	On 140 separate occasions, the facility relocated filled railcars to an uncontained outdoor area not authorized for storage by the facility's HWFP. In addition, the facility's closure plan stated that no waste was to be stored outside of the facility. The function of the HW management requirement was rendered ineffective because some of its provisions were not complied with.	20	No	n/a	0	20.00	

Violation Scoring Matrix

Facility Name:		CALIFORNIA OIL TRANSFER LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		12/12/2017		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		5300 CLAUS ROAD, RIVERBANK, CA 95357		Number of Inspections:		2		Permit Expiration Date:		12/11/2027			
EPA ID:		CAL000190816		Total Number of Violations Scored:		12		Date VSP Completed:		8/15/2019			
10	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or perform emergency clean-up operation or other corrective action for releases.	22 CCR 66270.30(a)	The facility accumulated a greater volume of HW onsite than allowed by its HWFP. According to the facility's Railcar Capacity Calculation logs submitted to DTSC, the facility accumulated over 50,000 gallons of HW onsite in railcars on 64 separate occasions, from 2014-2016.	Minimal	Exceedance of used oil over the permitted capacity (specific exceedance volumes not specified) represented a minimal threat to human health and the environment due to the wastestream in violation.	Major	The facility accumulated over 50,000 gallons of HW onsite in railcars on 64 separate occasions from 2014-2016. The HWFP states that at no time shall the volume of material, HW, and non-HW present at the facility exceed 50,000 gallons. 64 instances in three years demonstrated that the function of the HW management requirement was rendered ineffective.	15	No	n/a	0	15.00	
Provisional Inspection Violation Score:											102.00		

Violation Scoring Matrix

Facility Name:	CALIFORNIA OIL TRANSFER LLC	10 Year Date Range:	2009-2018	Permit Effective Date:	12/12/2017	Link to EnviroStor (Inspection Reports, SOVs, etc.)
Address:	5300 CLAUS ROAD, RIVERBANK, CA 95357	Number of Inspections:	2	Permit Expiration Date:	12/11/2027	
EPA ID:	CAL000190816	Total Number of Violations Scored:	12	Date VSP Completed:	8/15/2019	

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	2	CEI	8/20/2012	30.00
2	10	CEI & FRR	6/23/2016 CEI, 2/28/2017 FUI & 9/23/2016 FRR	102.00
Sum of Provisional Inspection Violation Scores				132.00
*FACILITY VSP SCORE				66.00

*FACILITY VSP SCORE = Sum of Provisional Inspection Violation Scores/Total Number of Inspections conducted in 10 year (calendar) timeframe

- | | |
|---|--|
| <p>CCR = California Code of Regulations
 CDI = Case Development Inspection
 CEI = Compliance Evaluation Inspection
 CI = Complaint Investigation
 DTSC = Department of Toxic Substances Control
 EPA ID = Environmental Protection Agency Identification
 FCI = Focused Compliance Inspection
 FRR = Financial Records Review
 FSD = Facility Self Disclosure
 FUI = Follow-Up Inspection</p> | <p>GAR = Groundwater Audit Report
 GME = Groundwater Monitoring Evaluation
 HSC = Health and Safety Code
 HW = Hazardous Waste
 HWFP = Hazardous Waste Facility Permit
 n/a = Not Applicable
 NFRR = Non-Financial Record Review
 RCRA = Resource Conservation and Recovery Act
 SOV = Summary of Violations
 VSP = Violations Scoring Procedure</p> |
|---|--|

PROOF OF SERVICE

1. I served the NOTICE OF PROVISIONAL INSPECTION VIOLATION SCORES, 2019 FACILITY VIOLATION SCORING PROCEDURE SCORE, AND 2019 COMPLIANCE TIER ASSIGNMENT on Richard Renfro, California Oil Transfer, LLC, EPA ID Number CAL000190816.
2. I served Richard Renfro, California Oil Transfer, LLC, by mailing a copy of the aforementioned document via Certified Mail, Receipt No. 7018-0680-0000-9827-9508, return receipt requested, in a sealed envelope addressed to:

Mr. Richard Renfro
California Oil Transfer, LLC
5300 Claus Road, Building 11
Modesto, California 95357

3. My name, business address, and telephone number are:

Alan Korematsu
Department of Toxic Substances Control
HWMP, 11th Floor
1001 I Street
Sacramento, CA 95812-0806
(916) 323-3706

I declare under penalty of perjury that the foregoing is true and correct and that this declaration of Proof of Service is executed on October 4, 2019 at Sacramento, California.



(Signature)