



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.: 7018-0680-0000-9827-9270

Mr. William Nakiso
Industrial Service Oil Company, Inc
1700 S Soto Street
Los Angeles, California 90023

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

Dear Mr. William Nakiso:

2019 Facility Violations Scoring Procedure (VSP) Score: 28.56
2019 Compliance Tier Assignment: Conditionally Acceptable

The purpose of this letter is to provide Industrial Service Oil Co., Inc, CAD099452708, located at 1700 S Soto St., Los Angeles, CA 90023 (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 "**28.56**". 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 "**Conditionally Acceptable**". 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:		INDUSTRIAL SERVICE OIL COMPANY, INC.		10 Year Date Range:		2009-2018		Permit Effective Date:		6/25/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		1700 SOUTH SOTO STREET, LOS ANGELES, CA 90023		Number of Inspections:		8		Permit Expiration Date:		6/24/2018			
EPA ID:		CAD099452708		Total Number of Violations Scored:		11		Date VSP Completed:		5/7/2019			
Inspection Date:	10/26/2009 CEI & 11/5/2009 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:	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
Class II Violations:	1	The deviation from the requirement was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of operation.	22 CCR 66270.30(a)	The facility failed to comply with all the conditions of its permit by failing to conduct current tank assessments (inspections) as noted in the Part B Permit Application, Volume 6, under API 653 Tank Certification Tracking Table.	Minimal	Nine tanks were five years overdue for tank certification. Wastes stored in these tanks included waste oil and waste antifreeze. Minimal harm due to wastestreams. No information regarding tank capacity.	Major	The following nine tanks were five years overdue for their certification: Tanks 21-27; and Tanks 42 and 43. By failing to conduct tank assessments, the requirement was completely ignored and rendered ineffective.	15	No	n/a	0	15.00
Provisional Inspection Violation Score:												15.00	
Inspection Date:	5/24/2010	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:	CI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.00
Provisional Inspection Violation Score:												0.00	

Violation Scoring Matrix

Facility Name:		INDUSTRIAL SERVICE OIL COMPANY, INC.		10 Year Date Range:		2009-2018		Permit Effective Date:		6/25/2008		Link to EnviroStor	
Address:		1700 SOUTH SOTO STREET, LOS ANGELES, CA 90023		Number of Inspections:		8		Permit Expiration Date:		6/24/2018		(Inspection Reports, SOVs,	
EPA ID:		CAD099452708		Total Number of Violations Scored:		11		Date VSP Completed:		5/7/2019		etc.)	
Inspection Date:	6/22/2011	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:	1	The deviation from the requirement was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of operation.	22 CCR 66270.30	Failure to comply with the conditions of the HWFP, in that the facility failed to submit the following documents for DTSC's review and/or approval: demonstrations that each tank is equipped with a level gauge and high/low level alarm; demonstration that a vapor control system has been installed for storage Tank 600 in compliance with SCAQMD Rule 1178; a written proposal to install additional air pollution controls on the oil/water separator; an inspection and maintenance program to monitor fugitive emissions on a monthly basis; a closure plan for the former oil storage tank locations; demonstrations that the facility is not located within a 100-year floodplain; a revised Section V of the Part B HWFP application that complies with air emission standards for tanks, surface impoundments, and containers.	Moderate	DTSC did not receive the requested documentation that the at issue items were (or were to be) installed. Because DTSC did not receive this information, DTSC had no way of knowing if protective measures had been put in place to prevent releases at the facility. Failure to have these protective measures increased the potential for a release at the facility.	Major	The facility failed to respond to DTSC's 8/4/2010 written request for these documents. The requirement was completely ignored, and none of it's provisions were complied with.	20	No	n/a	0	20.00
	2	The deviation from the requirement was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of operation.	22 CCR 66270.30	The facility failed to comply with the HWFP, in that the facility used Tank #42 which is designated in the permit for "oil recycling" as a "waste antifreeze holding tank".	Minimal	Minimal harm as the wastestream at issue was antifreeze. No specific information on the volume of the tank was provided in the inspection report.	Major	The facility used Tank #42 instead of the appropriate Tank #47 for storing waste antifreeze. Tank #42 was permitted for use as a used oil recycling tank. The function of the requirement was rendered ineffective as the facility ignored the permit requirement.	15	No	n/a	0	15.00
Provisional Inspection Violation Score:												35.00	
Inspection Date:	10/30/2013	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	n/a	n/a	n/a	n/a	0.00
Provisional Inspection Violation Score:												0.00	

Violation Scoring Matrix

Facility Name:		INDUSTRIAL SERVICE OIL COMPANY, INC.		10 Year Date Range:		2009-2018		Permit Effective Date:		6/25/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		1700 SOUTH SOTO STREET, LOS ANGELES, CA 90023		Number of Inspections:		8		Permit Expiration Date:		6/24/2018			
EPA ID:		CAD099452708		Total Number of Violations Scored:		11		Date VSP Completed:		5/7/2019			
Inspection Date:	10/20/2014 FCI & 12/16/2014 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:	FCI & FRR												
Class I Violations:	1	The deviation from the requirements was significant enough that it could result in failure to assure adequate financial resources to pay for facility closure.	22 CCR 66264.143, 22 CCR 66264.143(e)(6), and HWFP	The facility failed to establish and demonstrate adequate financial assurance for closure of the facility; and maintain the existing closure policy in full force and effect until the Department consented to termination of the policy.	Major	The facility did not have enough money to cover the cost of closure. The facility processed used oil and antifreeze, and stored waste in tanks.	Major	Zurich North America signed the Financial Assurance for Closure documents on 10/27/14, but backdated the document to 10/16/14. The requirement was rendered ineffective.	25	No	n/a	0	25.00
	2	The deviation from the requirement was significant enough that it could result in failure to assure adequate financial resources in the case of releases.	22 CCR 66264.147	On or about 10/20/2014, the facility failed to establish and demonstrate adequate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities; and have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.	Major	The facility had no liability coverage in case of a release.	Major	The facility did not have liability insurance for the time period of 8/16/13 to 8/15/14. The facility never responded to their insurance company, Zurich North America's notice to renew, so their liability insurance automatically cancelled. The requirement was rendered ineffective.	25	No	n/a	0	25.00
Provisional Inspection Violation Score:												50.00	

Violation Scoring Matrix

Facility Name:		INDUSTRIAL SERVICE OIL COMPANY, INC.		10 Year Date Range:		2009-2018		Permit Effective Date:		6/25/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		1700 SOUTH SOTO STREET, LOS ANGELES, CA 90023		Number of Inspections:		8		Permit Expiration Date:		6/24/2018			
EPA ID:		CAD099452708		Total Number of Violations Scored:		11		Date VSP Completed:		5/7/2019			
Inspection Date:	4/7/2016 CEI & 12/20/2016 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 result in a failure to assure that HW are destined for a delivered to an authorized HW facility.	HSC 25189.2(a)	On 148 separate occasions, the facility made misrepresentations on the Sample Information Sheet, as it pertained to the testing of halogens of each incoming load in May of 2016.	Moderate	The facility's misrepresentation of the results of all incoming loads as <1000 ppm halogens presents a moderate potential for harm, as the facility has an increased potential to accept loads contaminated with PCBs or other halogens that can potentially contaminate their equipment, trucks, etc. and expose its workers.	Major	The Sample Information Sheet for May 2016 shows that on 148 occasions, the test for halogens was marked as done, even though the facility was aware that no testing had been conducted. The facility marked <1000 ppm halogens for each incoming load, even though no testing occurred. Additionally, the facility only tested for halogens, using a composite sample, whenever the tank was full. 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
	2	The deviation from the requirement was significant enough that it could result in a failure to assure that HW are destined for or delivered to an authorized HW facility.	22 CCR 66270.30(a) and HWFP	In 5/2016, the facility failed 45 times to determine, prior to accepting used oil, if the used oil contained more than 1,000 ppm halogens, by not testing each shipment of used oil for total halogens as required by its Permit.	Moderate	Halogen testing was done for the tank, after the tank had accepted multiple loads, but was not always performed on individual incoming loads. The facility stated that it was not practical to wait (24 hours) for the test results to unload the oil. Because of this, there was an increased potential to accept loads contaminated with PCBs or other halogens and potentially contaminate its tanks, equipment, and vehicles; and expose its workers.	Major	The Sample Information Sheet for 5/2016 shows that on 45 separate occasions, the test for halogens was not conducted. The function of the requirement was rendered ineffective because some of its provisions were not complied with.	20	No	n/a	0	20.00
	3	The deviation from the requirement was significant enough that it could result in a failure to assure that HW are destined for or delivered to an authorized HW facility.	HSC 25250.1(a)(C)(i)	The facility accepted HW not allowed under its HWFP.	Moderate	By accepting bulk ignitable waste from a tanker truck, when the facility was not approved by permit to accept this wastestream, the potential for a possible release and/or fire was increased. The amount and characteristics of the waste at issue posed a moderate potential for harm.	Major	The facility accepted used oil contaminated with 31 ppm halogens with a flash point of 65 degrees Fahrenheit. Waste from a tanker truck was pumped into the Used Oil Receiving Tank. The facility was not permitted to accept ignitable HW. The requirement was rendered ineffective as it was completely ignored.	20	No	n/a	0	20.00
Provisional Inspection Violation Score:												60.00	

Violation Scoring Matrix

Facility Name:		INDUSTRIAL SERVICE OIL COMPANY, INC.		10 Year Date Range:		2009-2018		Permit Effective Date:		6/25/2008		Link to EnviroStor		
Address:		1700 SOUTH SOTO STREET, LOS ANGELES, CA 90023		Number of Inspections:		8		Permit Expiration Date:		6/24/2018		(Inspection Reports, SOVs,		
EPA ID:		CAD099452708		Total Number of Violations Scored:		11		Date VSP Completed:		5/7/2019		etc.)		
Inspection Date:	5/16/2017 CEI & 6/20/2017 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 result in failure to assure adequate financial resources to pay for facility closure.	22 CCR 66264.143	The facility failed to establish and demonstrate financial assurance for closure care.	Major	The facility did not have enough money to cover the cost of closure. The absence of financial assurance directly impacts the ability to respond to events that impact human health or the environment.	Major	The facility was deficient the entire amount of the \$1,787,075 closure cost estimate. The requirement was rendered ineffective.	25	Yes	10/20/2014	25	31.25	
	2	The deviation from the requirement was significant enough that it could result in failure to assure adequate financial resources in the case of releases.	22 CCR 66264.147	The facility failed to establish and demonstrate financial assurance for sudden liability.	Major	The facility did not have liability coverage in case of a release. The absence of financial assurance directly impacts the ability to respond to events that impact human health or the environment.	Major	The facility had insufficient documentation to show that they had financial assurance for sudden liability. The requirement was rendered ineffective.	25	Yes	10/20/2014	25	31.25	
	3	The deviation from the requirement was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of operation.	22 CCR 66264.16(c)	The facility failed to have four facility personnel take part in an annual review of the initial training required.	Minimal	When employees do not have their annual safety training update, the potential for both injuries and releases to occur is increased. Minimal harm is assessed due to the wastestream being used oil.	Moderate	The eight hour Hazwoper Training certificates for four (out of seven) employees who handle HW expired on 2/13/17. The requirement functioned to some extent although not all of its important provisions were complied with.	6	No	n/a	0	6.00	
												Provisional Inspection Violation Score:		68.50
Inspection Date:	6/28/2018 CEI & 8/1/2018 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:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.00	
												Provisional Inspection Violation Score:		0.00

Violation Scoring Matrix

Facility Name: INDUSTRIAL SERVICE OIL COMPANY, INC.	10 Year Date Range: 2009-2018	Permit Effective Date: 6/25/2008	Link to EnviroStor (Inspection Reports, SOVs, etc.)
Address: 1700 SOUTH SOTO STREET, LOS ANGELES, CA 90023	Number of Inspections: 8	Permit Expiration Date: 6/24/2018	
EPA ID: CAD099452708	Total Number of Violations Scored: 11	Date VSP Completed: 5/7/2019	

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	1	CEI & FRR	10/26/2009 CEI & 11/5/2009 FRR	15.00
2	0	CI	5/24/2010	0.00
3	2	CEI	6/22/2011	35.00
4	0	CEI	10/30/2013	0.00
5	2	FCI & FRR	10/20/2014 FCI & 12/16/2014 FRR	50.00
6	3	CEI & FRR	4/7/2016 CEI & 12/20/2016 FRR	60.00
7	3	CEI & FRR	5/16/2017 CEI & 6/20/2017 FRR	68.50
8	0	CEI & FRR	6/28/2018 CEI & 8/1/2018 FRR	0.00
Sum of Provisional Inspection Violation Scores				228.50
*FACILITY VSP SCORE				28.56

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

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| <ul style="list-style-type: none"> < = Less than API = American Petroleum Institute 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 | <ul style="list-style-type: none"> 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 PCB = Polychlorinated biphenyls PPM = Parts per million RCRA = Resource Conservation and Recovery Act SCAQMD = South Coast Air Quality Management District SOV = Summary of Violations VSP = Violations Scoring Procedure |
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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 William Nakiso, Industrial Service Oil Co. Inc., EPA ID Number CAD099452708.
2. I served William Nakiso, Industrial Service Oil Co. Inc., by mailing a copy of the aforementioned document via Certified Mail, Receipt No. 7018-0680-0000-9827-9270, return receipt requested, in a sealed envelope addressed to:

Mr. William Nakiso
Industrial Service Oil Co., Inc
1700 S Soto Street
Los Angeles, California 90023

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)