



**CHIQUITA CANYON**  
*A Waste Connections Company*

May 15, 2026

***Via E-Mail***

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**Re: CCL – Update to April 1, 2026 Draft West Slope Improvements Work Plan  
in Response to EPA’s Notice of Deficiency**  
UAO Docket No. RCRA 7003-09-2024-0001 and CERCLA 106-09-2024-05

Mr. Holybee:

Pursuant to the Unilateral Administrative Order (the “UAO”) issued by the United States Environmental Protection Agency (“EPA”), Docket No. RCRA 7003-09-2024-0001 and CERCLA 106-09-2024-05, to Chiquita Canyon, LLC (“CCL”), EPA issued a letter on March 17, 2026 (the “Additional Work Letter”) directing CCL to implement additional work under Paragraph 90 of the UAO, In the Matter of Chiquita Canyon, LLC, issued February 21, 2024. The Additional Work Letter requires, among other things, that CCL make improvements on the west side of the Chiquita Canyon Landfill (the “Landfill”) and submit work plans detailing those improvements. In response, on April 1, 2026, CCL submitted the Draft West Slope Improvements Work Plan (the “Plan”).

EPA reviewed the Plan and, in accordance with Paragraph 31 of the UAO, issued a Notice of Deficiency (the “Notice”) disapproving the Plan in part and directing CCL to revise the plan by April 26, 2026. CCL requested an extension until May 15, 2026, to revise the Plan, which EPA granted.

CCL has revised the Plan in response to EPA’s Notice as set forth below and hereby resubmits the Plan (the “Revised Plan”) pursuant to Paragraph 33 of the UAO.

**I. Correction to Section “Project Summary”**

- a. *The Plan should include a brief discussion of the need for the project, i.e. current conditions and how the project will address the problem.*

The Revised Plan has been updated as directed.

- b. *The Plan should provide a project schedule to meet the project completion deadline of September 15, 2026, with specific start dates and completion dates for the phases detailed by the “Installation Process” section of the Plan.*

The Revised Plan has been updated as directed to include a project schedule with a projected completion date of September 15, 2026. CCL will notify EPA if adjustments to the project schedule become necessary.

- c. *The Plan should confirm whether access to property outside of the Landfill boundary will be needed for the project and include in the project schedule timelines for obtaining access, consistent with the Additional Work Letter.*

CCL does not anticipate requiring access to property outside the Landfill boundary for implementation of the project. Accordingly, no off-site access activities have been included in the project schedule.

- d. *Consistent with the Additional Work Letter and the communication from John Perkey on March 31, 2026, EPA expects CCL to provide a certification of a qualified professional engineer(s) (in the case of relocation of the stormwater channel, a stormwater engineer) certifying the designs of the west slope improvements or stormwater channel, as applicable, concurrent with CCL’s resubmission of the Plan.*

CCL acknowledges EPA’s expectation regarding professional engineer certification of the final design documents. The applicable qualified professional engineer(s), including a stormwater engineer as appropriate, will certify the final design documents following EPA approval of the Plan.

**II. Correction to Section “Hours of Operation”**

- a. *The Plan should provide that under normal working conditions, excavation will not be conducted between 6pm and 6am, on weekends, or on legal holidays, unless otherwise approved in writing by EPA (not South Coast Air Quality Management District (“South Coast AQMD”).*

The Revised Plan has been updated as directed. The Revised Plan also clarifies that the restriction on excavation activities between 6:00 p.m. and 6:00 a.m.

Pacific Time, on weekends, and on legal holidays applies only to excavation into the waste mass.

### III. Correction to Section “Reroute Electrical Infrastructure”

- a. *The Plan lacks a discussion of how CCL will meet the requirement of the Additional Work Letter that “CCL shall take all necessary action to minimize the disruption to the gas collection system within the reaction area, including to horizontal collectors beneath the existing geomembrane cover, by moving, tying off, or otherwise modifying the existing gas collection system and to ensure continued gas collection to the maximum extent possible.” The Plan should, without limitation, describe whether the electrical infrastructure to be relocated is critical for operation of gas collection and other equipment in the West Slope area and/or other parts of the Landfill; explain whether the relocation of electrical infrastructure is expected to result in equipment downtime in the area of the West Slope and/or other parts of the Landfill; identify the equipment that is likely to experience downtime; and identify any potential emissions that may result from such downtime.*

As discussed with EPA on April 28, 2026, the initial electrical re-routing work was completed prior to May 4, 2026. Any additional electrical re-routing activities that may be needed will be implemented on a rolling basis as construction progresses through the various phases of work and will be performed in a manner intended to minimize disruption to the gas collection system and ensure continued gas collection to the maximum extent possible. CCL is not anticipating any meaningful equipment downtime associated with the electrical re-routing activities. The Revised Plan has been updated accordingly.

To the extent EPA seeks additional information regarding the electrical infrastructure supporting operation of gas collection and related equipment, or any potential emissions associated with the re-routing activities, CCL is willing to discuss those topics further with EPA.

- b. *The Plan should explain whether temporary portable engines or other equipment will be used to maintain operation of gas and leachate collection equipment such as thermal oxidizers and Lorentz pumps.*

Temporary portable generators were utilized during the initial electrical re-routing activities and may continue to be utilized, as needed, on a rolling basis during subsequent phases of the work to maintain continued operation of critical gas collection and leachate management equipment, including thermal oxidizers and Lorentz pumps, and to ensure continued operation of such equipment during implementation of the work. The Revised Plan has been updated accordingly.

#### IV. Deficiencies of Section, “Relocation of Gas and Liquids Infrastructure”

- a. *The Plan should provide for final designs of the gas and liquid infrastructure (including but not limited to force main piping, gas header piping, soil vapor extraction wells, horizontal wells, vertical wells, sumps, pumps, gas probes, gas liner rises, and gas corrugated liner risers) in the West Slope Area. These final designs must specify the locations to which any infrastructure will be relocated; whether any infrastructure will be extended or tied into existing access points; and whether any infrastructure will be abandoned.*

Gas probes and soil vapor extraction (SVE) wells are expected to be extended upward through the lower buttress to allow for continued access and operation. Gas wells and sumps within the waste mass are also expected to be extended upward beneath the upper buttress and connected to gas headers and liquid force mains, as appropriate.

Certain infrastructure modifications and connections will be determined in the field based on actual site conditions and construction progress and will be reflected in as-built documentation regularly submitted to South Coast AQMD. Such as-built documentation can also be provided to EPA upon request.

- b. *CCL should ensure that at no point during the project will any gas or leachate piping be allowed to remain open to the atmosphere.*

The Revised Plan has been updated as directed.

- c. *The Plan should explain how CCL will manage free liquids during the project. If CCL will manage free liquids by pumping the liquids via vac truck, the Plan should specifically address where the vac truck would be staged and what access the vac truck would have to the West Slope area.*

The Revised Plan has been updated as directed.

#### V. Deficiency of Section, “South Levee”

- a. *The Plan states “a retaining wall will be constructed,” and then mentions “The South Levee will be based on prior drawings.” Please confirm whether CCL intends the “retaining wall” to be the same as the “South Levee”.*

The Revised Plan has been updated to clarify that the retaining wall and South levee are the same structure.

- b. *The Plan states that “The South Levee will be based on prior drawings.” The Plan must include final design drawings/specifications for the South Levee. The final design drawings/specifications for the South Levee should reflect any changes*

*from the prior drawings, including the updated location at Cross Section F-F' in Appendix B.*

The Revised Plan has been updated as directed to include a final design plan for the South Levee.

**VI. Deficiency of Section, “Locate Existing Anchor Trench”**

- a. *CCL should ensure that repairs are made to the existing bottom liner as the anchor trench is being located to allow for the efficient tying in or extension of the bottom liner over the lower buttress. The Plan should address the sequencing of such repairs and methods of such repairs.*

The Revised Plan has been updated to clarify that, if existing bottom liner requiring repair is encountered, CCL will follow the standard best management practices as described in the remedial action workplan for the cover, using materials and methods appropriate for the existing bottom liner.

**VII. Deficiency of Sections, “Construct Lower Buttress” and “Construct Upper Buttress”**

- a. *EPA understands that the April 1, 2026 submission of the Plan was “preliminary”. As such, the Plan lacks supporting analysis to confirm that the proposed buttressing fill “is designed and (will be) constructed with sufficient height, thickness, extent, compaction, and other criteria to provide adequate support to the west slope to prevent additional slope failure.” The Plan must include the design specifications of the lower and upper buttress as well as an analysis (e.g., engineering calculations) demonstrating that the upper and lower buttresses will be sufficient to ensure static and dynamic stability of the West Slope.*

The Revised Plan has been updated as directed to include the design specifications for the proposed lower and upper buttresses, as well as supporting engineering analyses and calculations evaluating the static and dynamic stability of the West Slope.

- b. *The design specifications in the Plan must include the expected source of the estimated 265,000 cubic yards of soil necessary for the buttress and the acceptance criteria for soil (chemical, geotechnical, etc.).*

The Revised Plan has been updated to identify the anticipated sources of soil for construction of the proposed buttress. CCL currently anticipates that the majority of the approximately 265,000 cubic yards of soil will be obtained from on-site sources, supplemented as necessary by off-site sources. CCL will continue to supplement as appropriate soils are identified, and will include the properties, compaction results, and disposition tracking as part of the final report.

The Revised Plan also includes soil acceptance criteria applicable to material used for the buttress.

- c. *The Plan must clarify whether a smaller buttress for the northern section of the Western Slope will be included.*

There is no separate buttress for the northern section of the Western Slope, although it has different contours. The final design plans are now included in the Revised Plan.

- d. *The Plan shall incorporate or attach a Quality Assurance / Quality Control (QA/QC) Plan which includes the methods that CCL will implement to verify that construction materials meet specifications prior to the use of such materials and that final construction of the upper and lower buttresses has been completed to design specifications, including, without limitation, the methods for verifying that the fill material meets specifications and that compaction was performed to specifications. The QA/QC Plan should provide for CCL to submit to EPA documentation confirming satisfactory QA/QC was performed under the QA/QC plan.*

The Revised Plan has been updated to confirm that a certified engineer will verify the construction materials and confirm that construction of the upper and lower buttresses complies with the approved design specifications in a final QA / QC report.

#### **VIII. Deficiency of Section, “Future Stormwater Routes and Controls”**

- a. *The Plan must provide for final designs of the stormwater pathways, including (i) a design for routing stormwater to the East Basin and (ii) a design for routing stormwater to the South Basin.*

The Revised Plan has been updated as directed to include final designs for the proposed stormwater pathways. The stormwater routing components, including routing to the East Basin and the South Basin, are incorporated into the buttress design plans and supporting engineering analyses included in the Revised Plan.

#### **IX. Deficiency of Section, “Containment Structure on Southern End”**

- a. *The Plan indicates that the construction of an additional retention basin on the southern end of the West Slope project is being considered; however, neither the revised (i) West Slope Preemptive Secondary Containment Plan (Revision v.1.4) and (ii) West Slope Contingency Secondary Containment Plan (Revision v.1.4) provide for an additional retention basin on the southern end of the West Slope. The Plan should clarify whether an additional retention basin will be constructed and, if so, include the design specifications for such a basin.*

Preliminary evaluations indicate that construction of an additional retention basin at the southern end of the West Slope project is not currently anticipated to be necessary. CCL will, however, continue to evaluate whether an additional retention basin is desired or otherwise warranted as design and construction planning progresses.

**X. Deficiency of Section, “Sampling Plan”**

- a. *CCL cannot rely on its 2024 sampling results to characterize any waste generated as part of the West Slope project because the nature of the waste may have changed due to reaction conditions. Without additional sampling, CCL should place waste generated as a part of the West Slope project on any portion of the Landfill. CCL should confirm that if it generates any waste as part of the West Slope project, it will dispose such waste at appropriate off-site disposal facilities based on a proper waste determination; or, if CCL intends to place waste generated as part of the West Slope project on any portion of the Landfill, CCL should conduct sampling under a sampling plan approved by EPA, consistent with the Additional Work Letter.*

CCL separately submitted a Sampling and Analysis Plan (SAP) on April 27, 2026, and responded to EPA questions by email dated May 8, 2026. CCL has now collected the samples. A copy of the updated SAP and sampling results will be attached to the final plan.

**XI. Deficiency of Section, “Air Monitoring”**

- a. *An Organic Vapor Analyzer (OVA) should be used for monitoring for Total Organic Compounds as methane unless another monitor is approved by EPA (not South Coast AQMD).*

The Revised Plan has been updated as directed.

- b. *The Plan requires CCL to establish a “background level.” The Plan should clearly list the contaminants/analytes for which background levels will be established and, clarify throughout the Plan how background levels will be used (e.g., if stop work requirements suspend work until readings return to “pre-excavation levels,” clarify whether “pre-excavation levels,” is intended to reference background levels).*

The Revised Plan has been updated to clarify that background testing will be conducted prior to any excavation into waste mass. CCL anticipates that any such excavation, if necessary, would occur on or around July 6, 2026. CCL will propose the contaminants/analytes for which background levels will be established prior to commencement of liner opening activities, currently

anticipated to begin on or about June 1, 2026. The Revised Plan also clarifies that references to “pre-excitation levels” are intended to refer to established background levels for the applicable analytes.

## **XII. Deficiency of Section, “Excavation Working Face”**

- a. *The Plan should limit the excavation work place, which exposes refuse or other emission generating material to the atmosphere, to 1,000 square feet without prior written approval from EPA (not South Coast AQMD).*

The Revised Plan has been updated as directed; however, as discussed above, this restriction applies only in the event CCL excavates into waste mass. Additionally, CCL would appreciate the opportunity to discuss with EPA the potential for expanding the active excavation working face beyond 1,000 square feet, as appropriate, to facilitate efficient project implementation.

- b. *The Plan lacks a discussion of how it will meet the requirement of the Additional Work Letter, that “CCL shall take all necessary action to minimize fugitive landfill gas emissions and odors from the west toe area.” The Plan should provide, at a minimum:*

- i. *During excavation, all working excavation areas and excavated material shall be watered down until the surface is moist and then maintained in a moist condition to minimize emissions without creating a safety hazard condition; and*

- ii. *Landfill materials and refuse which have been exposed to the atmosphere as a result of the excavation, which have not been excavated and relocated for burial or transported off site, shall be immediately, not to exceed 30 minutes, safety permitting or unless otherwise approved in writing by EPA, covered with a minimum of 6 inches of clean soil whenever excavation is not actively in progress, and at the end of each working day so that no portion of landfill material and refuse is exposed to the atmosphere.*

The Revised Plan has been updated as directed.

- c. *The Plan acknowledges that the removal of the cover could result in “landfill gas and leachate exposure.” Given the likelihood of these exposures, and the possibility of a slope failure, CCL should adopt measures to address community health and safety during the project, including, without limitation: (i) undertaking fence line monitoring and stopping work and taking mitigation measures if thresholds are triggered; (ii) providing public notice of excavation activities at least 24 hours prior to such activities; (iii) providing a “cool zone” space for the public to go to during the course of the excavation activities and providing public*

*notice of the availability of the “cool zone”; and (iv) providing public notice when any ambient air monitoring stations at the fenceline or in the surrounding community (MS-01 through MS-12) reach or exceed the applicable OEHHA acute REL concentrations (e.g., benzene acute REL is 8 ppb 1-hour average, H2S acute REL is 30 ppb 1-hour average). Even if these requirements are covered in different sections of the Plan, they should be summarized in a section addressing community notification and impacts mitigation or a separate community health and safety plan for transparency.*

CCL is amenable to implementing appropriate fenceline monitoring measures during project activities involving excavation into waste mass and will coordinate with EPA regarding the scope and implementation of such monitoring, as appropriate, including appropriate response actions and mitigation measures in the event applicable thresholds are triggered. In addition, CCL already maintains an extensive ambient air monitoring network in and around the facility, including monitoring stations MS-01 through MS-12. CCL will also provide appropriate community notifications regarding planned excavation activities and, as appropriate, ambient air monitoring exceedances at monitoring stations MS-01 through MS-12. Finally, CCL will provide for a cool zone and related community notification measures. The Revised Plan has been updated accordingly.

- d. CCL should post a notice on the front page of its website ([chiquitacanyon.com](http://chiquitacanyon.com)), and notify in writing all addresses located within 5,280 feet (1 mile) of the excavation area, at least 48 hours in advance of planned excavation commencement with a short description of the proposed excavation work, the estimate times of day excavation is proposed to occur, the estimated excavation start date, and estimated excavation end date.*

The Revised Plan has been updated as directed to provide for such notice, to ensure that notice will be provided in the event waste is encountered.

### **XIII. Deficiency of Section, “Slope Stability Monitoring”**

- a. The Plan should require the operation of a network of real-time total stations with monuments to track the slope movement. CCL should provide a report on slope movement observed based on the monitoring station network on at least a weekly basis during all phases of the work from anchor trench excavation through immediately prior to construction of the upper buttress. CCL may request a later initiation of slope stability monitoring if expedited procurement is not available prior to initiating excavation work.*

CCL is continuing to evaluate and finalize slope monitoring measures that will satisfy EPA’s requested specifications. During the initial phases of the project, including activities prior to any anticipated excavation into waste mass, CCL will utilize spotters and ongoing site observations to monitor slope conditions. CCL anticipates implementing additional slope monitoring measures, including

monitoring consistent with discussed specifications, in advance of any anticipated excavation into waste mass. CCL will continue to provide updates regarding slope monitoring observations and implementation status in its weekly reports to EPA.

- b. *Please clarify whether the reference to the “2024 Stability Analysis Work Plan” is a reference to the Slope Stability Recommendations, dated July 19, 2024, attached as Appendix C to the prior West Toe Drain Installation Project Work Plan. We note that the July 19, 2024, recommendations were revised as of August 23, 2024.*

CCL confirms this was a typographical error, which has now been corrected.

- c. *CCL should work with local and emergency responders to ensure arrangements are in place for notifying the community in the event significant slope movement is detected, as requested in the letter dated April 14, 2026, regarding Public Health Directive to Develop a Community Exposure Mitigation Plan for a Slope Failure at the Chiquita Canyon Landfill, from the County of Los Angeles, Department of Public Health.*

Based on current site conditions and ongoing monitoring data, CCL does not anticipate significant slope movement during implementation of the planned work activities. Nevertheless, CCL is preparing a response to the County of Los Angeles Department of Public Health and will coordinate with local agencies and emergency responders regarding appropriate community notification measures based on slope conditions observed through CCL’s monitoring program.

#### **XIV. Deficiency of Section, “Stop Work Requirements”**

- a. *CCL should implement South Coast AQMD’s Modified Order for Abatement, Condition 42 (“Condition 42”), for the West Slope Project as follows:*
- i. *Implement the following subsections of Condition 42, as modified pursuant to this Notice:*
    1. *Condition 42(a), as modified pursuant to Section xv.a, below*
    2. *Condition 42(b), as modified pursuant to Section ii.a., above*
    3. *Condition 42(h), as modified pursuant to Section xi.a., above*
    4. *Condition 42(j), as modified as follows: During excavation, if the OVA or other approved organic monitor shows a sustained reading (greater than 15 second) of 200 ppmv Total Organic Compounds as methane or greater downwind from the excavation site at the property line (or other approved locations), the excavation shall cease and the area generating the emissions shall immediately be completely covered with a minimum of 6 inches of clean dirt. Excavation shall not resume until the readings return to the pre-excavation level.*

5. *Condition 42(n), as modified pursuant to Section xii.b.ii., above*
6. *Condition 42(o), as modified as follows: Daily inspection shall be conducted of any covered excavation area (per Condition 42(j), 42(n), above) to ensure the integrity of the cover(s) is maintained and secured so that no portion of the soil is exposed to atmosphere. If the cover material is not completely covering the landfill materials and refuse generating emissions, or if the integrity of the cover has been compromised, immediate corrective action shall be taken to add and secure a new cover, or additional cover, on the area requiring corrective action. An inspection log shall be maintained to record the time of the inspections and any corrective action performed.*
7. *Condition 42(s), as modified as follows: Landfill excavation mitigation measures, other than those listed in this Notice and the West Toe Improvements Additional Work Letter; which EPA personnel determine are necessary to protect the health and safety of the public, shall be implemented upon written request.*
8. *Condition 42(v), as modified pursuant to Section xii.d., above*
9. *Condition 42(y), as modified pursuant to Section xii.a., above*
10. *Condition 42(aa), as modified as follows: During excavation, if any ambient air monitoring stations in the surrounding community (MS-01 through MS-12) reach or exceed applicable OEHHA acute REL concentrations (e.g. benzene acute REL is 8 ppb 1-hr average, H2S acute REL is 30 ppb 1-hour average), the excavation will cease and the area generating the emissions will immediately be covered with a minimum of 6 inches clean soil. Excavation will not resume until concentrations return and remain below the REL threshold(s) for the duration of at least one averaging cycle for the respective acute RELs.*

*For clarity, solely for the purposes of the West Slope project, CCL does not need to comply with the unmodified forms of these requirements.*

CCL appreciates EPA's clarification that, solely for purposes of the West Slope Project, CCL is not required to comply with the unmodified forms of these requirements. The Revised Plan has been updated accordingly.

ii. *Solely for the purposes of the West Slope project, CCL does not need to comply with the following Conditions:*

1. *Condition 42(c);*
2. *Condition 42(d-e);*
3. *Conditions 42(i);*
4. *Condition 42(k);*
5. *Condition 42(t);*
6. *Condition 42(x);*
7. *Condition 42(z); and*
8. *Condition 42(bb).*

*EPA has determined that compliance with these requirements is not practicable for the West Slope project and has the potential to interfere or delay the project.*

CCL appreciates EPA’s clarification that, solely for the purposes of the West Slope Project, CCL is not required to comply with these requirements.

iii. *Comply with the following subsections of Condition 42, if applicable, in their standard form, including reporting to South Coast AQMD (as applicable):*

1. *Condition 42(f);*
2. *Condition 42(g);*
3. *Condition 42(l);*
4. *Condition 42(m);*
5. *Condition 42(p);*
6. *Condition 42(q);*
7. *Condition 42(r);*
8. *Condition 42(u); and*
9. *Condition 42(w).*

CCL acknowledges EPA’s determination that these requirements continue in force for the West Slope Project to the extent applicable. CCL will remain mindful of these requirements to the extent the conditions are triggered during project activities. The Revised Plan has been updated accordingly.

#### **XV. Deficiency of Section, “Mandatory Communications and Notifications”**

- a. *CCL shall notify EPA and South Coast AQMD at least two (2) days prior to each excavation commencement and within five (5) days after its completion. The notification shall be made by email to the EPA Project Coordinators and to South Coast AQMD [Christina Ojeda, Air Quality Inspector, [cojeda@aqmd.gov](mailto:cojeda@aqmd.gov)];*

**CCL – Update to the April 1, 2026 Draft West Slope Improvements Health and Safety Plan**

April 20, 2026

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*Gerardo Vergara, Air Quality Inspector ([gvergara@aqmd.gov](mailto:gvergara@aqmd.gov)); and [Rule1150notifications@aqmd.gov](mailto:Rule1150notifications@aqmd.gov)]. The subject line of the email should contain “CCL West Slope Excavation Notification” The body of the email shall contain the following information:*

- i. Company Name and Company ID*
- ii. Site Address*
- iii. Notification Type (2 days prior or 5 days after)*
- iv. Estimated Excavation Start Date and Completion Date*
- v. A Map of the Facility with Excavation Location Indicated*

The Revised Plan has been updated as directed. CCL will provide the notifications described above to EPA and South Coast AQMD consistent with the specified timing and content requirements.

Please let us know if you have any questions or if you would like to schedule a call to discuss.

Sincerely,



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Kevin Green  
District Manager  
Chiquita Canyon Landfill

cc: John Perkey, Waste Connections  
Jim Little, Waste Connections  
Kurt Shaner, Waste Connections  
Dylan Smith, Waste Connections  
Sarah Phillips, Waste Connections  
Megan Morgan, Beveridge & Diamond  
Nicole Weinstein, Beveridge & Diamond  
Allyn Stern, Beveridge & Diamond  
Alana Mathews, California Environmental Protection Agency  
Todd Sax, California Environmental Protection Agency  
Sophia Carillo, California Environmental Protection Agency  
Karen Gork, Los Angeles County Department of Public Health, acting as the Local Enforcement Agency  
Thanne Berg, California Department of Toxic Substances Control  
Dylan Clark, California Department of Toxic Substances Control  
Zanalee Zmily, California Department of Toxic Substances Control  
Laura Friedli, United States Environmental Protection Agency  
Amy C. Miller-Bowen, United States Environmental Protection Agency  
Michael Montgomery, United States Environmental Protection Agency