



Memorandum

MONTEREY REGIONAL WASTE MANAGEMENT DISTRICT

Reviewed by: RA Date: 8/13/21
General Manager

DATE: August 13, 2021
 TO: General Manager
 FROM: Director of Engineering & Compliance
 SUBJECT: Authorize the General Manager to Execute MBARD's July 29, 2021 Suspension, Tolling, and Settlement Agreement (Agreement) and Pay a Fine in the Amount of \$29,352.

RECOMMENDATION: Authorize the General Manager to Execute MBARD's July 29, 2021 Suspension, Tolling, and Settlement Agreement (Agreement) and Pay a Fine in the Amount of \$29,352.

BACKGROUND

As previously reported to the Board, the Monterey Regional Waste Management District (MRWMD) received notices of noncompliance from the Monterey Bay Area Air Resources District (MBARD) on October 13, 2020; November 9, 2020; and May 13, 2021 for failure to correct surface emissions monitoring exceedances and failure to maintain required minimum combustion temperature in the enclosed flare. The surface emission monitoring exceedances occurred in the period of 1st Quarter 2019 to 3rd Quarter 2020. The enclosed flare temperature deviations occurred several times during the 1st semi-annual period of 2020.

DISCUSSION

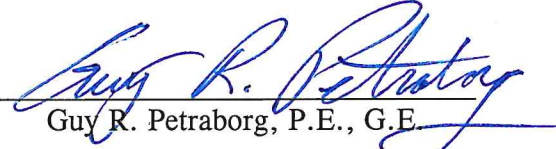
On July 29, 2021, the MRWMD received the Suspension, Tolling, and Settlement Agreement (Agreement) from MBARD for the prior notices of noncompliance referenced above. The Agreement summarizes the noncompliance elements, references the corrective actions that MRWMD has taken and compliant surface emissions monitoring for 4th Quarter 2020 thru 2nd Quarter 2021 that have resulted, and references additional measures for MRWMD to complete as conditioned in the Agreement. The Agreement defines that MBARD determined that \$177,888 in civil penalties could be assessed for the noncompliance; that a fine of \$29,352 has been levied and is due at this time; and that the balance of \$148,536 of the civil penalties is suspended condition on MRWMD conducting certain operations monitoring and reporting activities to MBARD as defined in the Agreement. MRWMD's General Manager, Legal Counsel, and myself reviewed the Draft Agreement and provided comments to MBARD that they used in finalizing the Agreement. Following the Board Meeting and the Board's approval, the General Manager will sign the Agreement and submit it to MBARD with a check for the fine in the amount of \$29,352. Staff will continue to address the conditioned responsibilities outlined in the Agreement.

FINANCIAL IMPACT

The payment of the \$29,352 fine to MBARD is planned to occur in August 2021 and will be included as an expense in the FY 2021/22 log of expenses. The conditional requirements presented in the Agreement are being conducted by staff as part of their assigned responsibilities and in associated with prior approval of third-party resources to assist in those matters. The Board has previously approved investments in remote monitoring systems and in additional landfill gas collection wells that will assist MRWMD in compliance operations and monitoring and reporting activities. These were part of the approved budget. There are no revenue considerations associated with this topic.

CONCLUSION

The Suspension, Tolling, and Settlement Agreement and Fine issued by MBARD is a prescriptive process of the regulations that are delegated to air districts and are required of air districts to implement with the permit holder. The air permit holder, MRWMD in this case, is required to participate in the process and enter into the final agreement that is developed. MRWMD's General Manager, Legal Counsel, and staff reviewed the Draft Agreement and provided comments to MBARD that were used in finalizing the Agreement in a form accepted by MRWMD. Staff therefore recommends that the Board authorize the General Manager to execute MBARD's July 29, 2021 Suspension, Tolling, and Settlement Agreement (Agreement) and Pay a Fine in the Amount of \$29,352 to formalize MRWMD's acceptance of the Agreement for the record.


Guy R. Petrabor, P.E., G.E.

Attachments:

MBARD Suspension, Tolling, and Settlement Agreement received July 29, 2021



MONTEREY BAY AIR RESOURCES DISTRICT

24580 Silver Cloud Court, Monterey, CA 93940

Suspension, Tolling and Settlement Agreement

This Suspension, Tolling and Settlement Agreement (“Agreement”) is entered into as of the date of execution by and between the Monterey Bay Air Resources District (“MBARD”) and the party named immediately below (the “Respondent”) (collectively, the Parties”):

Monterey Regional Waste Management District
14201 Del Monte Blvd
Monterey County, CA

RECITALS

WHEREAS, MBARD is a unified air pollution control district organized and operating pursuant to the laws of the State of California, and has primary responsibility for regulation of air pollution from stationary sources, including gasoline dispensing facilities, in Monterey, Santa Cruz, and San Benito Counties; and,

WHEREAS, MBARD entered into a Memorandum of Understanding with the California Air Resources Board to implement and enforce the state Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills; and,

WHEREAS, Respondent operates a municipal solid waste landfill in Monterey County subject to local, state, and federal requirements regarding the collection, control, and monitoring of landfill gas; and,

WHEREAS, Respondent monitors the landfill surface quarterly to comply with state Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills; and,

WHEREAS, Respondent must operate the landfill gas flare within a certain combustion temperature range to comply with Permit to Operate GNR-0017569 and sections 95460 to 95476, title 17, California Code of Regulations: Methane Emissions from Municipal Solid Waste Landfills; and,

WHEREAS, MBARD issued violations to Respondent for the calendar year 2019 and the first three quarterly periods of 2020 Annual Landfill Reports submitted for the Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills for failing to take corrective action after the third measured exceedance of the surface emission standards within 120 days; and,

WHEREAS, MBARD issued violations to Respondent for the calendar year 2020 flare temperatures being out of range in accordance with permit GNR-0017569 Condition 10; and,

WHEREAS, MBARD assessed \$177,888 in civil penalties against Respondent for alleged violations of MBARD Rule 200.3.7 for Permit to Operate GNR-0017569 and sections 95460 to 95476, title 17, California Code of Regulations: Methane Emissions from Municipal Solid Waste Landfills for calendar year 2019 and three quarterly periods of 2020; and,

WHEREAS, Respondent submitted a letter to MBARD on December 24, 2020 committing to improve compliance and complete a third party internal audit; and,

WHEREAS, Respondent acquired Board approval and began installation of 25 additional horizontal and vertical landfill gas extraction wells to address the landfill gas surface leaks; and,

WHEREAS, the fourth quarter 2020 and the first and second quarters 2021 surface monitoring results show compliance with the Regulation to Reduce Methane Emissions from Municipal Solid Waste Landfills; and,

WHEREAS, MBARD finds it reasonable and in the public interest to enter into this Agreement to potentially resolve Respondent's violation without the need for further proceedings;

NOW THEREFORE, in consideration of the mutual promises and covenants contained in this Agreement, the Parties do hereby agree and undertake as follows:

AGREEMENT

1. In consideration of Respondent's promises and undertakings set forth in this Agreement, MBARD shall suspend \$148,536 of the civil penalties assessed for violations against Respondent ("Suspense Amount") regarding the matters set forth herein for a period of twelve months ("Grace Period"). The Grace Period begins on the date of execution of this agreement by MBARD and extends for twelve months.
2. MBARD shall refrain from administrative or judicial action seeking the Suspense Amount during the Grace Period, as more fully set forth below.
3. During the Grace Period, Respondent shall:
 - a. take immediate actions to ensure compliance with all conditions of the landfill gas flare permit GNR-0017569 and sections 95460 to 95476, title 17, California Code of Regulations: Methane Emissions from Municipal Solid Waste Landfills;
 - b. review, once every 24 hours, flare temperature data records and inspect recording instrumentation for compliance with conditions 10 through 15 of permit to operate GNR-0017569;
 - c. report all breakdowns of landfill gas control equipment in compliance with MBARD Rule 214;

- d. provide a written update on any planned upgrades to recording instrumentation or mechanical equipment to remotely monitor the flare system (permit to operate GNR-0017569);
 - e. complete and provide a summary of findings from the third-party internal audit no later than December 31, 2021 as indicated in item 1 of the letter to MBARD dated December 24, 2020;
 - f. provide a copy of the site-specific Air Compliance Plan to MBARD (BMPs) no later than December 31, 2021 as indicated in item 4 of the letter dated December 24, 2020;
 - g. provide a written update after the final completion of all new LFG extraction wells no later than December 31, 2021, as indicated in item 7 of the letter dated December 24, 2020;
 - h. provide electronic notification to the MBARD Compliance Division of landfill gas quarterly surface monitoring dates so that an MBARD inspector can be present. Notification of surface monitoring dates will be provided no less than 5 working days prior to monitoring. Notification will begin in the quarter immediately following the execution and delivery of this agreement;
 - i. provide the results of the quarterly landfill gas surface monitoring to MBARD within 45 days of the completion of the monitoring for the following quarters: Q3 2021, Q4 2021, Q1 2022, and Q2 2022. The results can be provided electronically to bnielson@mbard.org and aclymo@mbard.org;
4. Within 45 days of the execution and delivery of this Agreement, Respondent agrees to pay MBARD a civil penalty of \$29,352 in the form of a check made payable to "MBARD". This includes settlement of civil penalties for violations and shall be delivered, along with this Agreement, by mail, delivery service, or in person, to:

MBARD
24580 Silver Cloud Court
Monterey, CA 93940

- 5. If Respondent meets all obligations under this Agreement during and at the end of the Grace Period, MBARD shall provide Respondent a release discharging Respondent's liability for the payment of the Suspense Amount and all claims the MBARD may have regarding the alleged violations prior to and during the Grace Period.
- 6. During the Grace Period, MBARD shall not seek additional criminal or civil penalties under Health and Safety Code Sections 42400 and 42402 *et seq.*, or take any administrative or judicial action against Respondent for the same violations set forth in this agreement.
- 7. Respondent agrees that any statute of limitations applicable to the MBARD in pursuit to this agreement are tolled during the Grace Period.

8. If, at the end of the Grace Period, Respondent is not in compliance with the requirements of this agreement, the Suspense Amount will be immediately due and payable, and MBARD may pursue any and all remedies against Respondent for the violations set forth in this agreement and any other violations of MBARD rules or state law existing at that time.
9. Execution of this Agreement shall not constitute an admission of liability in any administrative or judicial proceeding, nor shall evidence of the terms of this Agreement be admissible in any such proceeding. However, MBARD reserves the right to prove any alleged violations in connection with any future petition for a variance, permit revocation, or abatement order before the MBARD Hearing Board, or to rely on such alleged violations in connection with the determination of the appropriate penalty in the event Notices of Violation for similar violations are issued in the future. Similarly, at any such time the Respondent may raise any defenses or contrary proof the Respondent may have concerning the facts of any such alleged violations, the right to prove is retained.
18. If the Respondent fails to comply with any of the terms of this Agreement, as a non-exclusive remedy and at its sole discretion, MBARD may terminate this Agreement upon ten (10) calendar days written notice to Respondent stating the effective date of termination ("Termination Date"), unless the breach is cured within that ten-day notice period.
19. If this Agreement is so terminated, any civil penalties already paid pursuant to this Agreement shall not be refunded, the Suspense Amount will be immediately due and payable, and MBARD may pursue any and all remedies against Respondent for the violations set forth in this agreement, and any other violations of MBARD rules or state law existing as of the Termination Date or thereafter.
21. This Agreement does not, and is not intended to, act as a variance.
22. This Agreement does not relieve Respondent of its obligations to comply with all MBARD Rules, or state and federal law, except as expressly stated herein, nor relieve Respondent of its potential liability for violations not specified herein. Nothing in this Agreement shall be construed as limiting in any way MBARD's ability to commence an action or seek relief against Respondent as the result of violation(s) that are not the subject of this Agreement.
23. Compliance with this Agreement does not grant Respondent relief from enforcement of State law by the State or the District Attorney.
24. This Agreement and all its terms and conditions shall become effective as of the date of execution by MBARD's Air Pollution Control Officer and shall be final and binding upon the parties.
25. Each of the undersigned expressly affirms that he or she is authorized to execute this Agreement on behalf of the party whom he or she represents. MBARD and Respondent freely enter into this Agreement.
26. This Agreement shall be interpreted pursuant to the laws of the State of California.
27. This Agreement may be executed in counter-parts.

- 28. This Agreement may only be amended in the form of a writing signed by each of the Parties.
- 29. This Agreement shall be binding upon any assignees or successors-in-interest of the Parties.
- 30. Any notice pursuant to this Agreement shall be given in writing by a Party or its legal representative by (a) personal delivery, (b) reputable overnight delivery service with proof of delivery, or (c) United States Mail, postage prepaid, registered or certified mail, return receipt requested, or to such other address or to the attention of such other person as the addressee shall have designated by written notice sent in accordance with this Section, and shall be deemed to have been given either at the time of personal delivery, or, in the case of expedited delivery service or mail, as of the date of first attempted delivery at the address and in the manner provided herein. Unless changed in accordance with the preceding sentence, the addresses for notices given pursuant to this Agreement shall be as follows:

For Respondent:
 MRWMD
 Tim Flanagan, General Manager
 PO Box 1670
 Marina, CA 93933

For MBARD:
 MBARD
 Richard A. Stedman, APCO
 24580 Silver Cloud Court
 Monterey, CA 93940

The foregoing constitutes the full and complete agreement regarding the subject matter herein. This Agreement supersedes all prior agreements and understandings, whether in writing or oral, related to the subject matter of this Agreement that are not set forth in writing herein.

For Respondent (Monterey Regional Waste Management District):

 Printed Name

 Signature

 Date

For MBARD:

Richard A. Stedman, Air Pollution Control Officer

 Signature

 Date

Approved as to form:

Leslie J. Girard, MBARD Counsel

Signature

Date

Attachments:

Letter, RE: Monterey Peninsula Landfill Air Quality Action Plan dated December 24, 2020
Notices of Noncompliance

BOARD OF DIRECTORS
CARRIE THEIS
Chair
JASON CAMPBELL
Vice Chair
GARY BALES
LEO LASKA
JANE PARKER
BRUCE DELGADO
DENNIS ALLION
JERRY BLACKWELDER
DAN ALBERT



MONTEREY REGIONAL
WASTE MANAGEMENT DISTRICT
Home of the Last Chance Mercantile

TIMOTHY S. FLANAGAN
General Manager
GUY PETRABORG, P.E., G.E.
Director of Engineering & Compliance
ZOE SHOATS
Director of Communications
PETER SKINNER
Director of Finance & Administration
TIM BROWNELL
Director of Operations
ROBERT WELLINGTON
Legal Counsel

December 24, 2020

Mr. Richard Stedman, Executive Officer
Monterey Bay Air Resources District
24580 Silver Cloud Court
Monterey, CA 93940

RE: Monterey Peninsula Landfill Air Quality Action Plan

Dear Richard,

First of all, let me thank you and your staff for your patience in working with the MRWMD as we work on our internal processes to drive to better compliance. With that in mind, I had suggested that the District would provide you with this update of Monterey Regional Waste Management District's (MRWMD) Action Plan to address shortcomings in LFG fugitive emission control and related air compliance monitoring, recordkeeping, and reporting for the Monterey Peninsula Landfill. The Action Plan being implemented consists of the following:

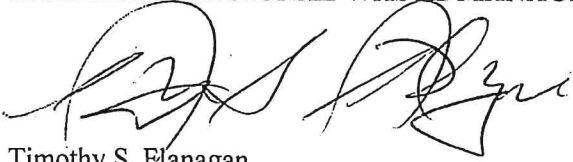
1. Third-party internal audit of Air Compliance monitoring, recordkeeping, and reporting activities. This endeavor is currently in-progress.
2. Separate third-party independent peer review of the third-party internal Air Compliance audit (noted in item #1). Scheduled to follow the internal audit documentation. This 3rd party review of this process will be developed to make sure we are adopting "best practices" not currently being practiced.
3. Implementation of the recommendations received from Items #1 and 2 above including, but not limited to, the addition of internal employee resource(s) and external consultant resource(s).
4. Documentation of the third-party recommendations and other Best Management Practices (BMPs) in a site-specific Air Compliance Plan.
5. Operations review of the landfill's Gas Collection and Control System (GCCS) by an experienced third-party which will include, but will not be limited to, the internal combustion engine-generator sets and the enclosed LFG flare. Implementation of recommendations resulting from the GCCS operations review.
6. Operations review of the solid waste disposal operations by an experienced third-party. Implementation of recommendations resulting from the solid waste disposal operations review.
7. Completion of drilling of 13 new vertical LFG extraction wells between December 9th and December 13th. These 13 extraction wells are part of the planned installation of 25 new vertical landfill gas collection wells approved by the Board of Directors in March 2020. These LFG extraction wells include a new feature consisting of a membrane added to the upper bore seal for enhanced surface emission control (2019 design) around the well. The remaining 12 extraction wells are planned for installation in January. This funding is present in our FY 20/21 Capital Budget Plan adopted by our Board.

CLOSING

MRWMD recognizes the significant importance of air compliance in the success of our goals and responsibility as a public entity serving the community. MRWMD will continue to coordinate with MBARD on these important matters and provide reports of progress of our Action Plan.

Sincerely,

MONTEREY REGIONAL WASTE MANAGEMENT DISTRICT

A handwritten signature in black ink, appearing to read 'Timothy S. Flanagan', is written over the printed name and title.

Timothy S. Flanagan
General Manager

Monterey Bay Air Resources District

24580 Silver Cloud Court, Monterey, CA 93940 • (831) 647-9411 • www.mbard.org

Notice of Noncompliance

Issued To: Monterey Regional Waste Management District

Date: October 13, 2020

Address: 14201 Del Monte Blvd, Monterey County

Permit No. _____

(If applicable)

This facility has been found to be operating in noncompliance with District regulations as described below. You are urged to determine the cause of the noncompliance, and to correct it as soon as possible. A follow up inspection may be conducted by the District at any time.

Please note that each day during which a violation occurs or continues constitutes a separate violation.

Violation of Air District Rule:

Rule 200 Permits

- 3.1 Construction/Installation/Alteration
- 3.2 Operation, Use
- 3.7 Permit condition
- Other: _____

ATCM

- Diesel Fueled Engines
- Dry Cleaning
- School Bus Idling
- Other: _____

Smoke Management

- PFIRS
- (Rx) Smoke Management Permit
- Other: _____

Rule 438 Open Outdoor Fires

- 3.1 General Prohibition – unapproved material
- 3.3.1 Burn Permit
- Other: _____

Hearing Board Order

CCR Title 13 PERP

Rule 1002 – Vapor Recovery (Gas Stations)

Rule 1010 – Stationary Compression Ignition Engines

Rule 434 Metal Parts and Coatings

Rule 400 Visual Emissions

Rule 402 Nuisance

Rule 416 Solvents

Rule 424 Asbestos Renovation/Demolition

Other: CARB's Regulation: Methane Emissions from Municipal Solid Waste Landfills

DESCRIPTION OF NONCOMPLIANCE:

- Failure to install a new or replacement well as determined to achieve compliance no later than 120 calendar days after detecting the third exceedance pursuant to 95469(a)(1)(B)(2)
- Failure to install a new or replacement well as determined to achieve compliance no later than 120 calendar days after detecting the third exceedance pursuant to 95469(a)(2)(B)(2)
- Failure to report corrective actions for positive wellhead gauge pressure measurements pursuant to Section 95470 (a)(1)(E)

YOU ARE HEREBY NOTIFIED TO:

- Submit an addendum to the 2019 Annual Report identifying what corrective actions were taken for instantaneous and integrated surface monitoring exceedances and positive wellhead readings.
- For the 2020 surface monitoring events, review Q1, Q2, and Q3 monitoring data and where instantaneous or integrated monitoring had three exceedances, install a new or replacement well to comply with 95469(a)(1)(B)(2) and 95469(a)(2)(B)(2).
- Consider alternative compliance options allowed by the regulation to assist with achieving compliance.

Noncompliance must be corrected immediately

Noncompliance must be Corrected By: Due Date: 11/15/2020

The District settles most violations within our Mutual Settlement Program in lieu of formal court proceedings. The attached questionnaire provides an opportunity for you to tell your side of the incident, what was done to correct the violation, and what actions have been taken to prevent a future violation. Information you provide in the questionnaire may reduce potential penalties for this violation.

Recipients Name Printed: Guy Petraborg

Recipients Signature: _____

District Representative: Amy Clymo

Date: 10/13/2020

APCD FORM 16 (FORM.16nonform.docx)

Monterey Bay Air Resources District

24580 Silver Cloud Court, Monterey, CA 93940 • (831) 647-9411 • www.mbard.org

Notice of Noncompliance

Issued To: Monterey Regional Waste Management District

Date: 11-9-20

Address: 14201 Del Monte Blvd., Monterey County, CA

Permit No. GNR-0017569
(If applicable)

This facility has been found to be operating in noncompliance with District regulations as described below. You are urged to determine the cause of the noncompliance, and to correct it as soon as possible. A follow up inspection may be conducted by the District at any time.

Please note that each day during which a violation occurs or continues constitutes a separate violation.

Violation of Air District Rule:

Rule 200 Permits

- 3.1 Construction/Installation/Alteration
- 3.2 Operation, Use
- 3.7 Permit condition
- Other: _____

ATCM

- Diesel Fueled Engines
- Dry Cleaning
- School Bus Idling
- Other: _____

Smoke Management

- PFIRS
- (Rx) Smoke Management Permit
- Other: _____

Rule 438 Open Outdoor Fires

- 3.1 General Prohibition – unapproved material
- 3.3.1 Burn Permit
- Other: _____

Hearing Board Order

CCR Title 13 PERP

- Rule 1002 – Vapor Recovery (Gas Stations)
- Rule 1010 – Stationary Compression Ignition Engines
- Rule 434 Metal Parts and Coatings

Rule 400 Visual Emissions

Rule 402 Nuisance

- Rule 416 Solvents
- Rule 424 Asbestos Renovation/Demolition
- Other: _____

DESCRIPTION OF NONCOMPLIANCE:

Violation of District Rule 200 3.7 by failing to meet Condition 10 of PTO GNR-0017569 for the combustion temperature of the landfill flare.

MRWMD reported 10 deviations in the Title V: First Semi-Annual Monitoring Report of 2020 submitted August 14, 2020 for the flare combustion temperature of the landfill gas averaged over a 3-hour period that was less than 50 degrees of the most recent source test average temperatures.

YOU ARE HEREBY NOTIFIED TO:

Fill out attached Questionnaire; indicate why failure occurred and how the facility plans to correct and prevent future emission related releases.

Noncompliance must be corrected immediately

Noncompliance must be Corrected By: Due Date: _____

The District settles most violations within our Mutual Settlement Program in lieu of formal court proceedings. The attached questionnaire provides an opportunity for you to tell your side of the incident, what was done to correct the violation, and what actions have been taken to prevent a future violation. Information you provide in the questionnaire may reduce potential penalties for this violation.

Recipients Name Printed: Tim Flannigan by email

Recipients Signature: _____

District Representative: Bronwyn Nielson

Date: 11-9-20

APCD FORM 16 (FORM.16nonform.docx)

Monterey Bay Air Resources District

24580 Silver Cloud Court, Monterey, CA 93940 • (831) 647-9411 • www.mbard.org

Notice of Noncompliance

Issued To: Monterey Regional Waste Management District

Date: May 13, 2021

Address: 14201 Del Monte Blvd, Monterey County

Permit No. _____
(If applicable)

This facility has been found to be operating in noncompliance with District regulations as described below. You are urged to determine the cause of the noncompliance, and to correct it as soon as possible. A follow up inspection may be conducted by the District at any time.

Please note that each day during which a violation occurs or continues constitutes a separate violation.

Violation of Air District Rule:

Rule 200 Permits

- 3.1 Construction/Installation/Alteration
- 3.2 Operation, Use
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- Diesel Fueled Engines
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- Other: _____

Smoke Management

- PFIRS
- (Rx) Smoke Management Permit
- Other: _____

Rule 438 Open Outdoor Fires

- 3.1 General Prohibition – unapproved material
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- Other: _____

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Rule 400 Visual Emissions

Rule 402 Nuisance

Rule 416 Solvents

Rule 424 Asbestos Renovation/Demolition

Other: CARB's Regulation: Methane Emissions from Municipal Solid Waste Landfills

DESCRIPTION OF NONCOMPLIANCE:

- Failure to install a new or replacement well as determined to achieve compliance no later than 120 calendar days after detecting the third exceedance pursuant to 95469(a)(1)(B)(2)
- Failure to install a new or replacement well as determined to achieve compliance no later than 120 calendar days after detecting the third exceedance pursuant to 95469(a)(2)(B)(2)

YOU ARE HEREBY NOTIFIED TO:

- Provide MBARD with updates on the progress to install additional vertical and horizontal wells to reduce surface emission exceedances.
- Consider alternative compliance options allowed by the regulation to assist with achieving compliance.

Noncompliance must be corrected immediately

Noncompliance must be Corrected By: Due Date: _____

The District settles most violations within our Mutual Settlement Program in lieu of formal court proceedings. The attached questionnaire provides an opportunity for you to tell your side of the incident, what was done to correct the violation, and what actions have been taken to prevent a future violation. Information you provide in the questionnaire may reduce potential penalties for this violation.

Recipients Name Printed: Guy Petraborg by email

Recipients Signature: _____

District Representative: Amy Clymo

Date: 05/13/2021

APCD FORM 16 (FORM.16nonform.docx)