



Kentucky Division of Enforcement Annual Report State Fiscal Year 2015

**Commonwealth of Kentucky
Energy and Environment Cabinet
Department for Environmental Protection
Division of Enforcement
dep-enforcement.ky.gov**



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Message from the Director's Office

The Division of Enforcement was faced with many challenges and opportunities during SFY 2015. The Division's focus on water quality in the coal industry was in its fifth year. The focus of compliance determinations shifted from comprehensive reviews of coal discharge monitoring reports by Division staff to agency-directed reviews by the companies themselves. This change in review procedures led to contact with every viable coal operation on Kentucky by the end of SFY 2015. The number of drinking water enforcement cases increased due to the implementation of phase 2 of the Disinfection Byproduct Rule. The issue of aging infrastructure and operational issues in privately owned wastewater treatment works is a continuing issue and a significant challenge. Overall, enforcement in the water programs accounted for fifty percent of the total caseload in the Division during SFY 2015.

Underground Storage Tank cases continued to account for approximately thirty percent of the Division's caseload, despite a shrinking number of UST systems statewide. The placement of delivery prohibition "red tags" on noncompliant UST systems and the new requirement for each UST facility to have a Designated Compliance Manager led to a high number of automatic referrals to the Division.

While cases involving air quality issues account for eleven percent of the total enforcement caseload, a significant amount of time and resources were focused on air quality issues at the largest landfill in Kentucky, which is located in Boyd County. Issues with odors at other landfills statewide contributed to the Air Quality enforcement caseload as well.

Staff turnover during SFY 2015 presented a challenge to the Division as well as the Department as a whole. The end of the fiscal year found the Division attempting to fill approximately twenty five percent of its positions, which was completed successfully early in SFY 2016.

The topics presented here represent only a small fraction of the issues, successes and challenges facing the Division of Enforcement as we enter the new fiscal year. We move forward to face those challenges with confidence, competence, and enthusiasm.

Jeffrey A. Cummins
Division Director



On July 9, 2004, the Governor issued Executive Order 2004-731, making significant revisions in the organizational structure of the Cabinet. Several of the changes involved the Kentucky Department for Environmental Protection (KDEP), one of which was the creation of a new Division of Enforcement. The Division of Enforcement combined the staff and most of the activities previously included in the enforcement branches of the Division for Air Quality, the Division of Waste Management, and the Division of Water. The primary purpose of the organization of the Division of Enforcement was to promote a fair, firm, and consistent approach to gaining compliance through the resolution of enforcement cases.

The Division of Enforcement consists of 3 units: the Director's Office, the Civil Enforcement Branch, and the Compliance and Operations Branch. Each of these units performs a distinctly different function within the Division.

The Director's Office is responsible for the overall management of the Division. This includes setting Division priorities for accomplishing Department goals, coordinating with all of KDEP's divisions, and coordinating with management for KDEP and the Cabinet.

The Civil Enforcement Branch negotiates civil settlements for violations cited by the Kentucky Department for Environmental Protection. These cases include all media: air, waste, and water. The Civil Enforcement Branch continues to emphasize multi-media negotiations in order to efficiently and effectively address environmental violations.

The Compliance and Operations Branch has two functions: regulatory compliance and administrative support. Regulatory compliance involves citing environmental violations identified by either the Compliance and Operations Branch or KDEP's Central Office Programs; administrative support includes functions necessary for the day-to-day operation of the Division: budget, accounts payable, supplies, inventory, training, and travel.



Our Mission:

"To use a clear and consistent approach in bringing about and maintaining compliance with the Cabinet's regulatory programs by using appropriate and reasonable measures to resolve cases in a timely manner."

The Director's Office consists of the Division Director, the Assistant Director, and an Environmental Scientist. To complete the Division's "Mission", the Director's Office provides direction and support to the staff, while creating a work atmosphere that promotes productivity.

In addition to the overall management of the Division, the Director is responsible for the development and implementation of division-level policy involving operations and administration; is the Department's lead settlement negotiator for the resolution of environmental violations; and is the face of the Division when dealing with Cabinet and Department level management, as well as the regulated community in high-profile cases.

Other duties tasked to the Director's Office include the development and implementation of new Department procedures; coordinating efforts to satisfy the reporting requirements for programs with federal oversight, such as the Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act; quantifying and compiling Division metrics for internal and external reports; organizing enforcement efforts on special projects or program specific cases; and consistently looking for more efficient ways to achieve Division goals and objectives.

Case Referral Data

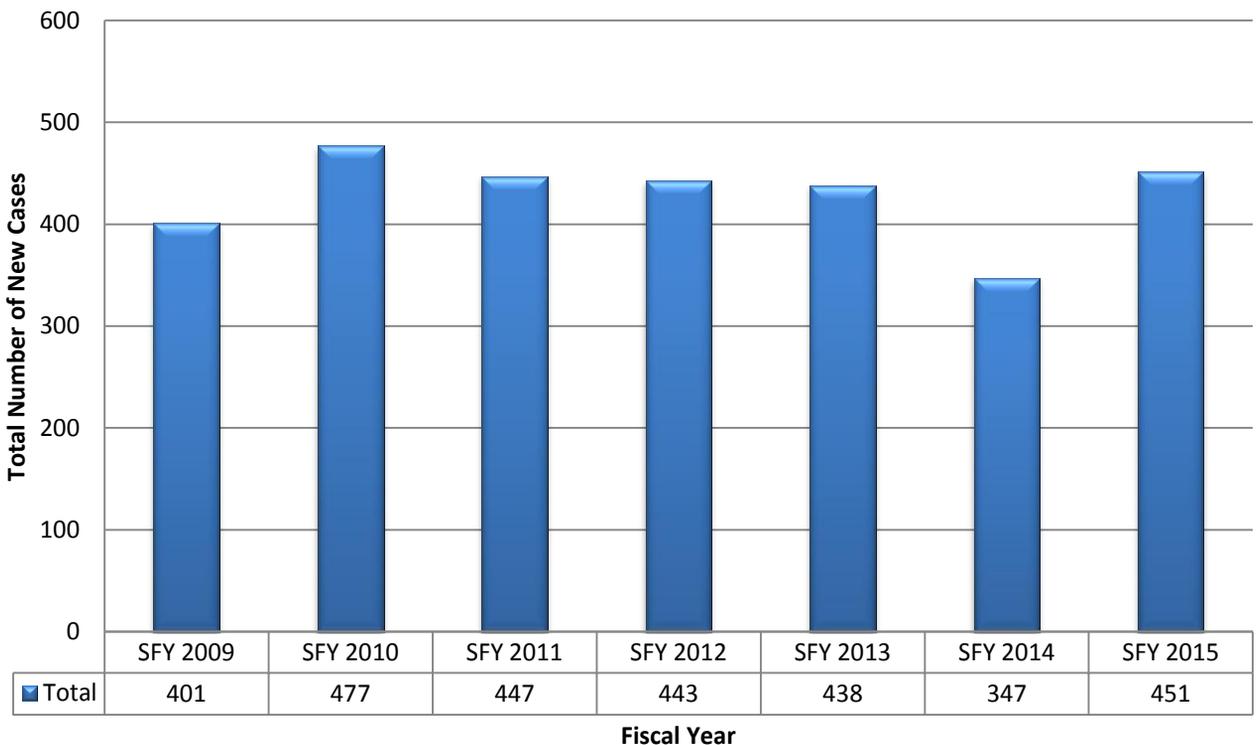
Case Referral Data: The Division of Enforcement receives new cases in the form of referrals. In SFY 2015, the Division received case referrals from all twelve Regional Offices, the Department’s Central Office Programs, and internally from the Compliance and Operations Branch. Before a referral can become a case, it must be approved by the Division Director.

New Cases: The Division of Enforcement received a total of 451 new case referrals in SFY 2015. This was an increase in 30%, as compared to the number of new case referrals in SFY 2014 (347).

Division of Enforcement

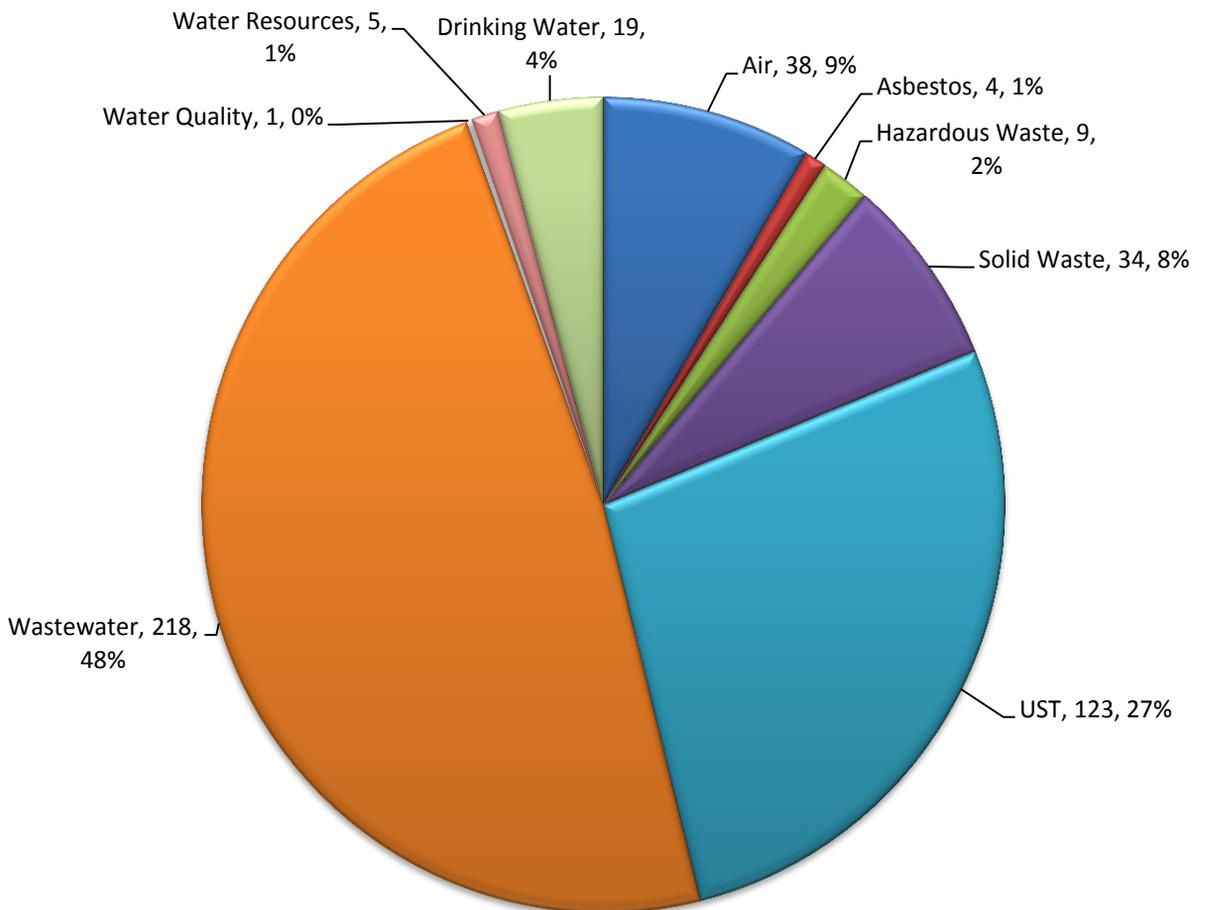
New Cases

SFY 2009 - SFY 2015



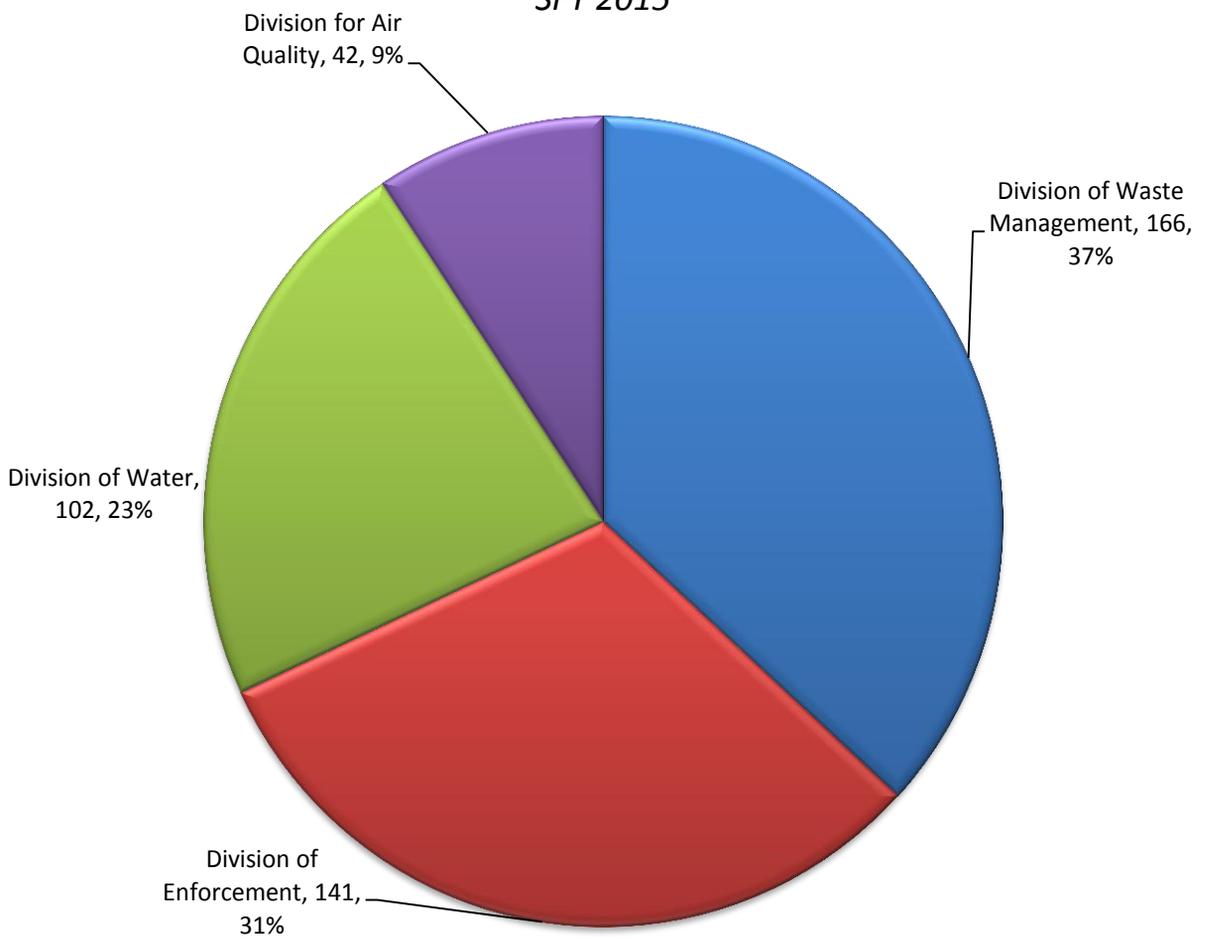
Case Referrals by Program: The Division of Enforcement received case referrals from nine different program areas in SFY 2015. Of 451 referrals, the highest number involved the wastewater program with 218 referrals (48%), followed by the UST program with 123 (27%).

Division of Enforcement Case Referrals by Program SFY 2015



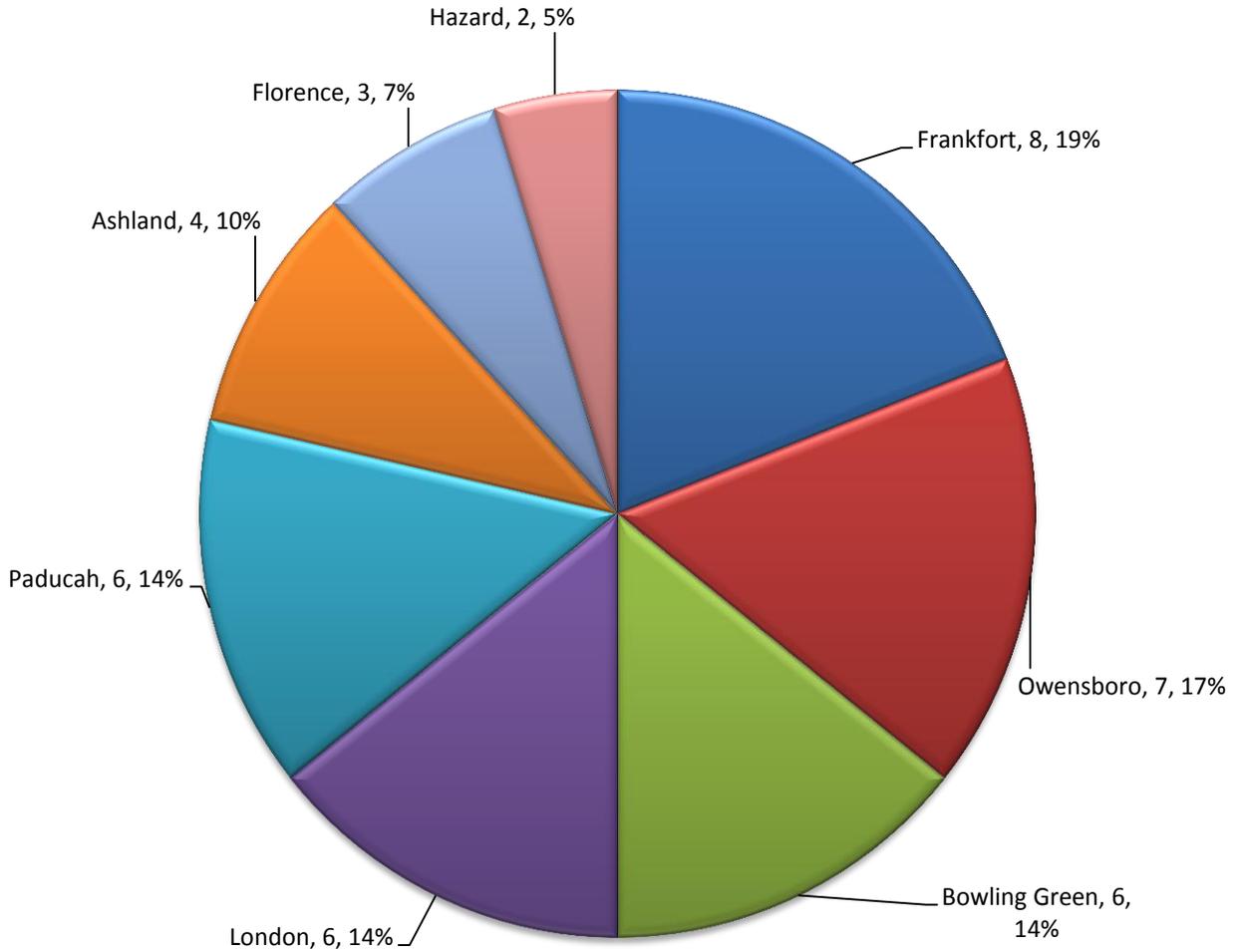
Case Referrals by Division: The Division of Enforcement received case referrals from all three media Divisions, Division for Air Quality (DAQ), Division of Waste Management (DWM), and Division of Water (DOW) in SFY 2015. The Division of Waste Management had the most referrals with 166 (37%). Internal referrals from the Division of Enforcement's Compliance and Operations Branch accounted for the second most, with 141 (31%).

Division of Enforcement Case Referrals by Division SFY 2015



Division of Enforcement

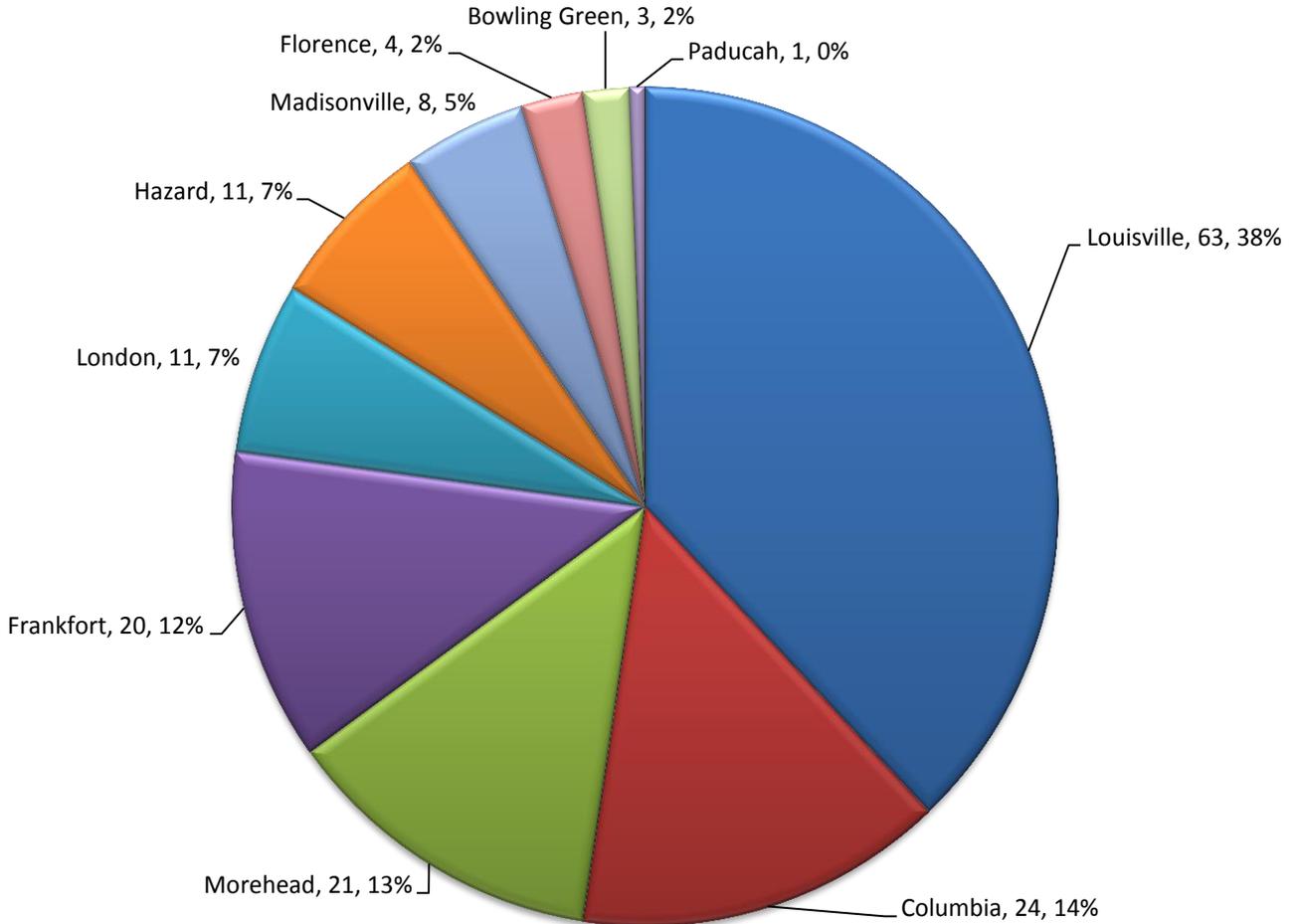
Division for Air Quality Case Referrals by Regional Office
SFY 2015



Case Referrals from the Division for Air Quality: The Division of Enforcement received 42 new case referrals from the Division for Air Quality in SFY 2015. Of the 42 referrals, the highest number came from the Frankfort Regional Office with 8 (19%), followed by the Owensboro Regional Office with 7 (17%).

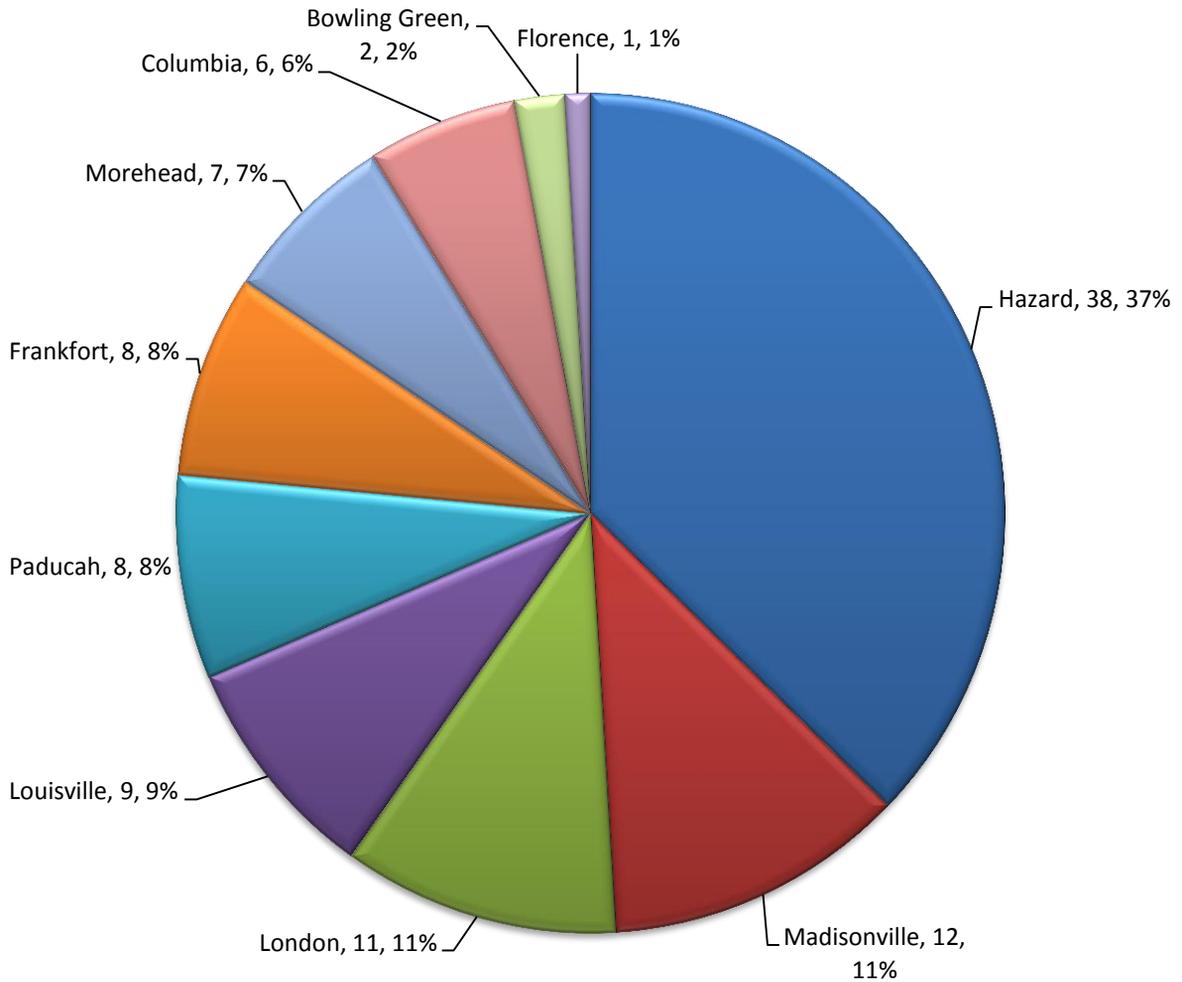
Division of Enforcement

Division of Waste Management Referrals by Regional Office SFY 2015



Case Referrals from the Division of Waste Management: The Division of Enforcement received 166 new case referrals from the Division of Waste Management in SFY 2015. Of the 166 referrals, the highest number came from the Louisville Regional Office with 63 (38%), followed by the Columbia Regional Office with 24 (14%).

Division of Enforcement Division of Water Referrals by Regional Office SFY 2015



Case Referrals from the Division of Water: The Division of Enforcement received 102 new case referrals from the Division of Water in SFY 2015. Of the 102 referrals, the highest number came from the Hazard Regional Office with 38 (37%), followed by the Madisonville Regional Office with 12 (11%).

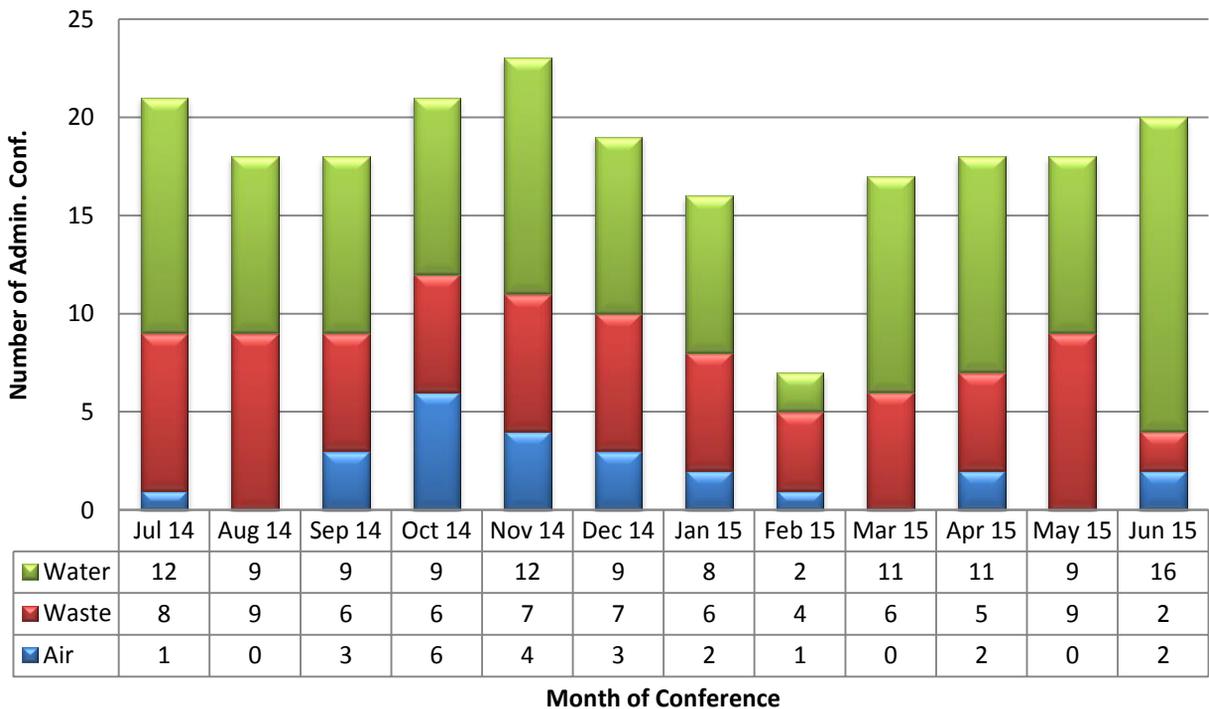
The Civil Enforcement Branch (CEB). When an Enforcement Specialist in CEB is assigned a case by the Branch Manager, they first begin researching the case. This involves conducting a file review, discussing the case with the inspector and program specialists, and contacting the regulated entity. The Enforcement Specialist will begin drafting a resolution strategy, called a Case Resolution Proposal (CRP), which includes corrective actions that are required to return the responsible party to compliance and proposed civil penalties for the violations. Upon approval of the CRP, the Enforcement Specialist schedules an administrative conference with the responsible party to discuss the steps necessary to resolve the violations and return the entity to compliance.



The **Administrative Conference** allows the KDEP representatives and the regulated entity to discuss the facts of the case. The Enforcement Specialist determines whether any information presented during the administrative conference changes the basis of the CRP and if so, discusses those changes with Division management. The Enforcement Specialist will make an initial settlement proposal to the responsible party during the Administrative Conference. Negotiations continue until an Agreement-in-Principle is reached between the Department and the responsible party, or until the determination is made that the parties cannot reach a negotiated settlement. The negotiation process can be lengthy, in some cases requiring multiple meetings over a period of months.

The Civil Enforcement Branch conducted 216 Administrative Conferences in SFY 2015, for an average of 18 per month.

Division of Enforcement Administrative Conferences Conducted by Media SFY 2015



Agreement-in-Principle. If negotiations are successful and the Division reaches an agreement on the terms of settlement with a responsible party, the Enforcement Specialist will draft a written document to formalize the agreement. The case is given an “Agreement-in-Principle” status, and the formal resolution document, which contains remedial measures and the amount of penalty to be assessed, is routed for approval.

In SFY 2015, DENF negotiated 176 Agreements-in-Principle, an average of 15 per month.



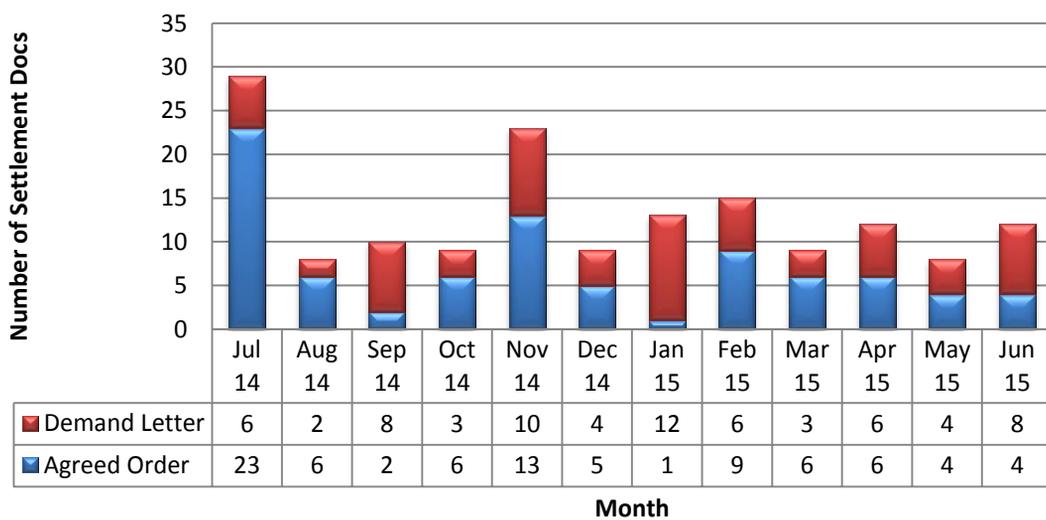
Demand Letters, which are unilateral agreements, are often used when the regulated entity has already completed the remedial measures required to return it to compliance. Demand Letters are formalized by the signature of the Director of the Division. Demand Letters are not final orders of the Cabinet and are not enforceable in Franklin Circuit Court. A Demand Letter may also be utilized when calling in stipulated penalties pursuant to executed Agreed Orders.

Agreed Orders, which are bi-lateral agreements, are used for more complex agreements. Agreed Orders are formalized by the signature of the Cabinet Secretary and filed with the Cabinet’s Office of Administrative Hearings. Agreed Orders are final orders of the Cabinet, and as such, are enforceable in Franklin Circuit Court.

The Division issued a total of 72 Demand Letters in SFY 2015, an average of 6 per month.

In SFY 2015, Agreed Orders were used to resolve 85 cases in the Division, an average of 7 per month.

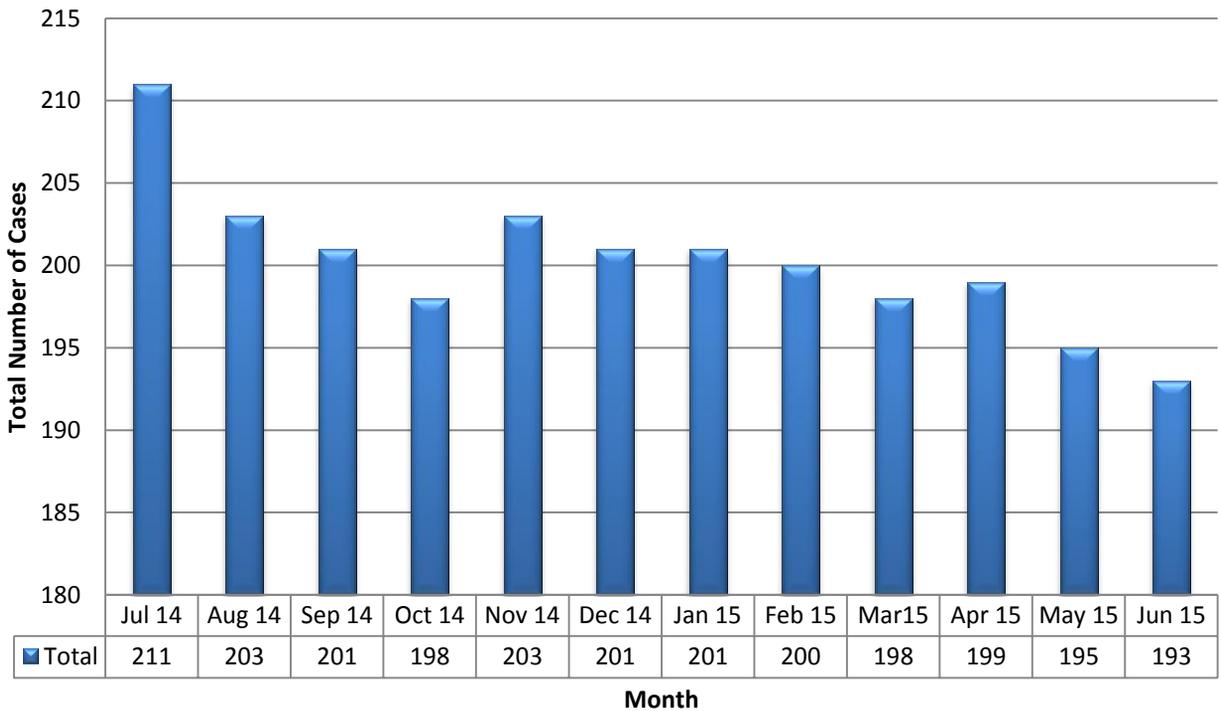
Division of Enforcement Settlement Documents Executed SFY 2015



Monitoring. The Enforcement Specialist assigned to a case is responsible for monitoring compliance with executed Demand Letters, Agreed Orders, or Secretary’s Orders. Cases will be closed upon compliance with the executed agreement. Failing to comply with the executed agreement can result in the resumption of settlement negotiations, initiation of a separate enforcement action, or with the Cabinet filing a complaint in Franklin Circuit Court seeking injunctive relief.

In SFY 2015, DENF monitored an average of 200 executed settlement documents each month.

Division of Enforcement Number of Cases Monitoring by Month SFY 2015

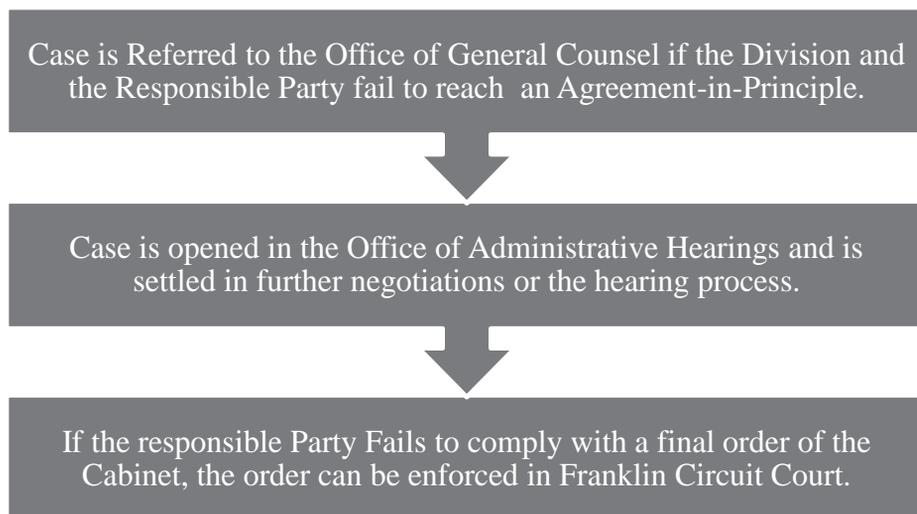


Office of General Counsel (OGC). Should the regulated entity and the Division not reach an Agreement-in-Principle, the case is referred to the Cabinet’s OGC where a Cabinet attorney is assigned to the case. These cases may be resolved through further negotiation, or may proceed to a formal hearing at the Office of Administrative Hearings.

Office of Administrative Hearings (OAH). When the Division is unable to resolve a case due to a multiple of factors, the OGC attorney will file the case with the Office of Administrative Hearings. A hearing officer considers the facts of the case and makes a recommendation for the resolution of the case to the Cabinet Secretary. The Cabinet Secretary can either accept or modify the hearing officer’s recommendation. The final resolution is documented in a Secretary’s Order, which is filed with OAH. The Secretary’s Order is a final order of the Cabinet and is enforceable in Franklin Circuit Court (FCC).

In SFY 2015, The Division referred 58 enforcement cases to the Cabinet’s Office of General Counsel for further enforcement action, an average of 5 per month.

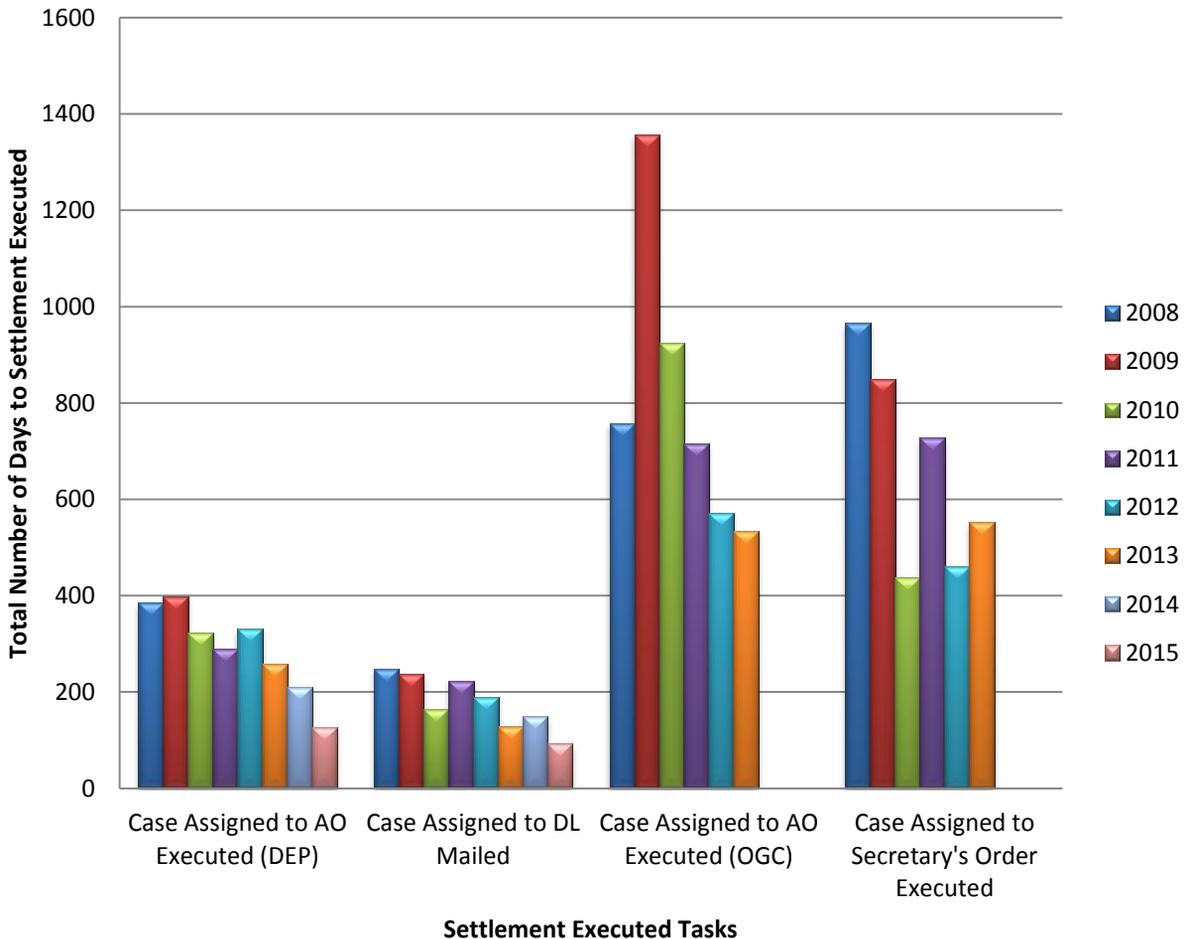
In SFY 2015, DENF resolved a total of 13 cases through the Office of General Counsel (11 Agreed Orders, 1 Secretary’s Order, and 1 Franklin Circuit Court Decision).



Executed Settlements: The Division of Enforcement uses Agreed Orders (AO), Demand Letters (DL), Office of General Counsel (OGC) Agreed Orders, and Secretary Orders (SO) to settle enforcement cases. The chart below shows the average number of days to reach an executed task.

Based on historical averages, once a case is referred to the Division, it takes 191 days to issue a Demand Letter, 322 days to execute an Agreed Order, 873 days to execute an OGC Agreed Order, and 728 days to execute a Secretary's Order.

Division of Enforcement
Average Number of Days to Settlement Executed
For Cases Referred Calendar Year 2008-2015





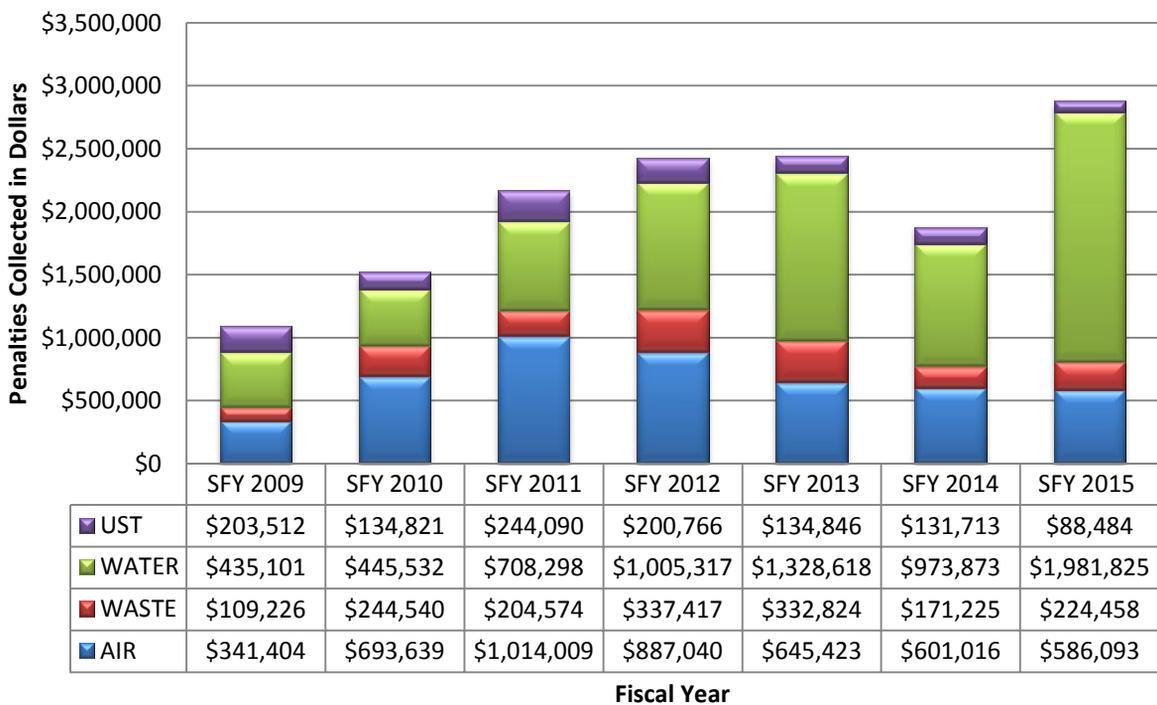
Environmental Protection Agency (U.S. EPA) can become involved in cases involving delegated authority for the state enforcement of federal programs. Examples of delegated programs include the Clean Air Act, the Clean Water Act, elements of the Safe Drinking Water Act, and the Resource Conservation and Recovery Act. The Cabinet will, under certain circumstances, refer a case to EPA for a federal enforcement action. In some cases, the Cabinet may negotiate an enforcement settlement jointly with U.S. EPA; U.S. EPA has the ability over file on an enforcement settlement previously reached between the Cabinet and the responsible party and proceed with a federal enforcement action.

At the end of SFY 2015, 5 enforcement cases had been referred to the United States Environmental Protection Agency.

Penalties Collected: In most enforcement cases, the Division of Enforcement assesses civil penalties for documented violations of Kentucky’s environmental laws. The Division may also use stipulated and performance penalties to encourage future compliance and to ensure that remedial measures or other requirements of an Agreed Order are completed. Penalty collections are tracked by the Office of Administrative Hearings and categorized by media type (UST, Water, Waste, and Air).

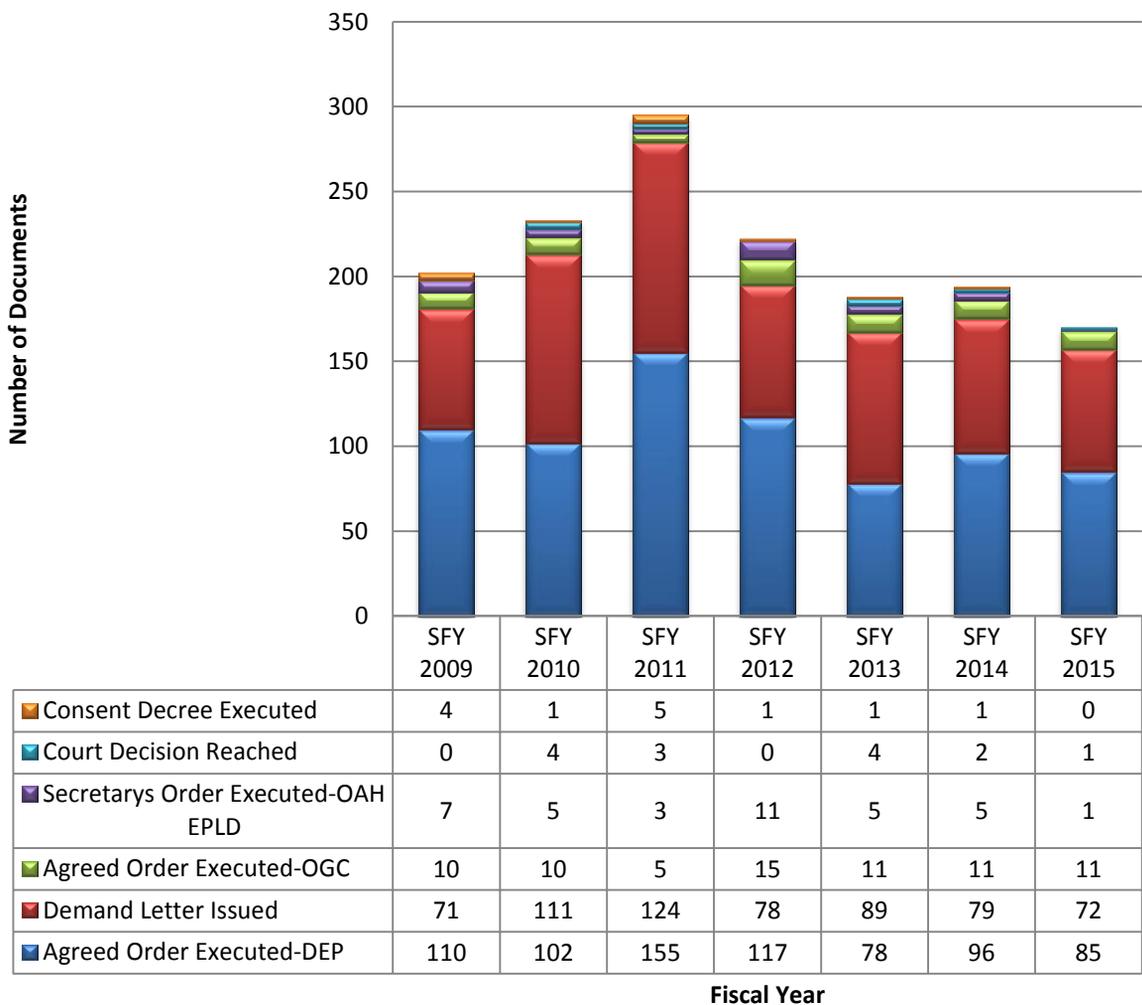
In SFY 2015, the Division of Enforcement collected \$2,880,860.87 in civil and stipulated penalties. \$1,981,825.45 of penalties collected in SFY 2015 involved cases from the Water media.

Division of Enforcement Penalties Collected by Fiscal Year SFY 2009 - SFY 2015



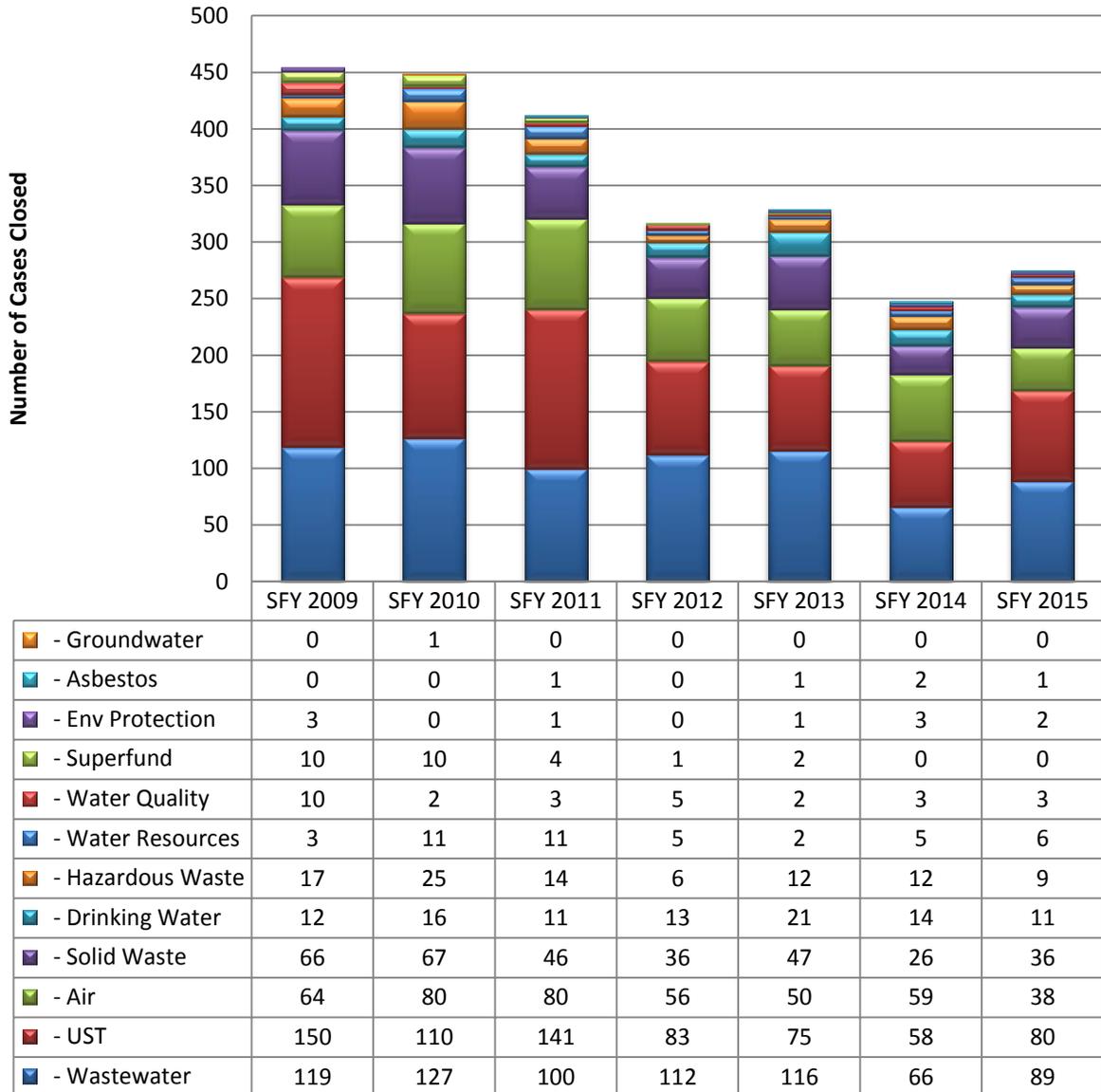
Total Settlement Documents: In SFY 2015, 170 settlement documents were executed. 157 of the settlements were negotiated in the Division of Enforcement, and 13 of the settlements came from cases that were referred to the Office of General Counsel.

Division of Enforcement Settlement Documents Executed Annually by Type *SFY 2009 - SFY 2015*



Closed Cases: From SFY 2009 to SFY 2015, an average of 355 cases have been closed annually. The Division of Enforcement closed a total of 275 enforcement cases in SFY 2015.

Division of Enforcement Cases Closed Annually by Program SFY 2009 - SFY 2015



Compliance and Operations Branch

The Compliance and Operations Branch (COB): The primary duty of an Enforcement Specialist in the Compliance and Operations Branch is to determine compliance with Kentucky's environmental regulations and cite violations through the issuance of Notices of Violation (NOVs).

In SFY 2015, eighty-eight percent (88%) of the NOVs issued by the Compliance and Operations Branch were for violations of the Kentucky Pollutant Discharge Elimination System (KPDES) permits issued by the Division of Water. KPDES permits include effluent limitations and require the regular submittal of Discharge Monitoring Reports to demonstrate compliance. Discharge Monitoring Reports are analyzed on a monthly/quarterly basis to ensure compliance with the KPDES Permit. The majority of the compliance reviews done in SFY 2015 were of coal facilities and municipal and non-municipal major/minor wastewater facilities.

Twelve percent (12%) of the NOVs issued by the COB in SFY 2015 were for violations referred by Central Office Programs from the Division of Air Quality, Division of Waste Management, and the Division of Water. Violations are referred from Hazardous Waste, Solid Waste, Superfund, Underground Storage Tanks, Municipal Storm Separate Sewer System (MS4), Pretreatment, Whole Effluent Toxicity (WET), Water Resources, and Water Quality Programs.

If a regulated entity fails to comply with the remedial measures contained in a NOV issued by the COB or the violations documented require further enforcement action the violations may be referred to the Division's Civil Enforcement Branch (CEB) for a formal enforcement action.

COB has issued 464 Notices of Violations and sent 152 Enforcement Referrals to CEB in SFY 2015.

Compliance and Operations Branch

Coal Compliance Reviews: Surface Mining Control and Reclamation Act (SMCRA) permits issued to coal facilities by the Cabinet's Department for Natural Resources (DNR) require that permittees also obtain a KPDES permit from the Division of Water. An Enforcement Specialist in the Compliance and Operations Branch conducts reviews of these coal facilities that typically cover a 2 year monitoring period, but can cover as many as 5 years based on the statute of limitations. During reviews, a specialist researches KPDES Permits, DMRs, SMCRA Permits, facility maps, and bench and lab analysis sheets to determine violations. The specialist also coordinates with DOW and DNR staff, as well as the regulated entities. In SFY 2015, the Branch has focused on reviewing all coal companies for the monitoring period of calendar years 2013 and 2014. This has resulted in the review of tens of thousands of DMRs and the citation of hundreds of violations. Many of those violations have resulted in referrals to the Civil Enforcement Branch for formal enforcement action.

In SFY 2015, Coal Compliance Reviews have resulted in 155 Notice of Violations issued and 87 referrals to the Civil Enforcement Branch.



Compliance and Operations Branch



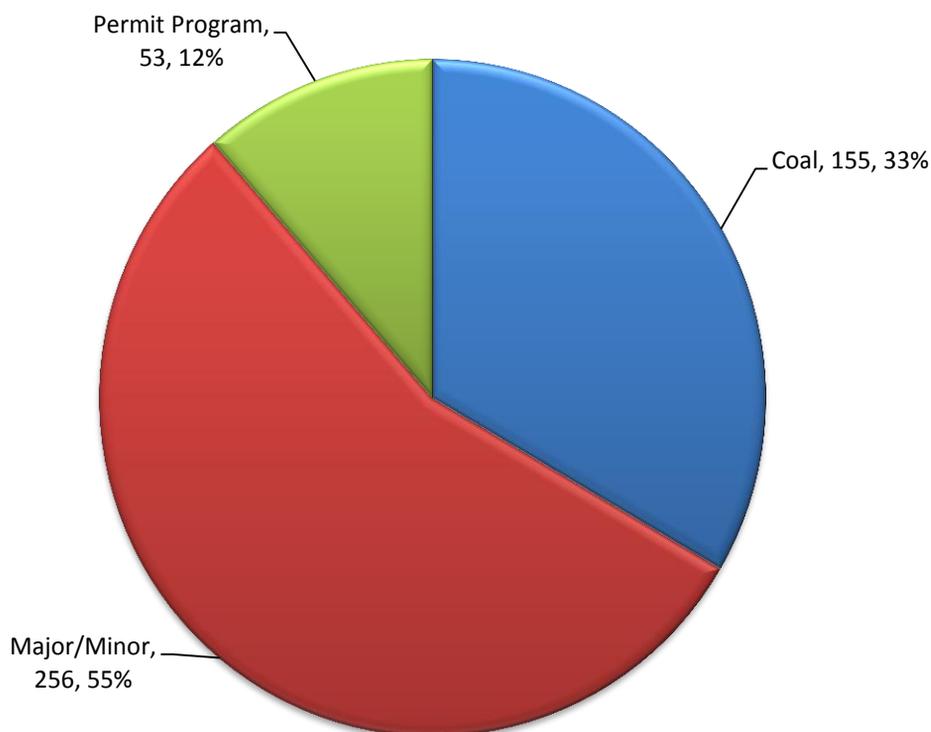
Major and Minor Wastewater Compliance Reviews: Generally, facilities with a design capacity over one million gallons per day (1.000 MGD) are considered “Majors”, and those under this threshold are considered “Minors”, though other criteria may be used to place a facility on the “Major” or “Minor” list. Major facilities are reviewed every quarter for compliance. These reviews look at the data submitted for the previous 3 months. Minor facilities are reviewed at less frequent intervals, and the reviews typically cover a period of two years or from the time of the previous review. In the review of both Major and Minor facilities, the Enforcement Specialist researches KPDES permits, DMRs, Inspection Reports from the Program Regional Offices, and past enforcement actions to determine compliance. The Specialist also develops and monitors facility-specific remedial measures when issuing NOVs. Violations that are noted in reviews are then incorporated into the Quarterly Non Compliance Report (QNCR) and the Annual Non Compliance Report (ANCR), for submittal to the Environmental Protection Agency. Facilities that fail to comply with the remedial measure requirements of a NOV or have Significant Non-Compliance (SNC) violations may be referred to the Civil Enforcement Branch for formal enforcement action.

In SFY 2015 Major/Minor Compliance Reviews have resulted in 256 Notices of Violations issued and 58 referrals to the Civil Enforcement Branch.

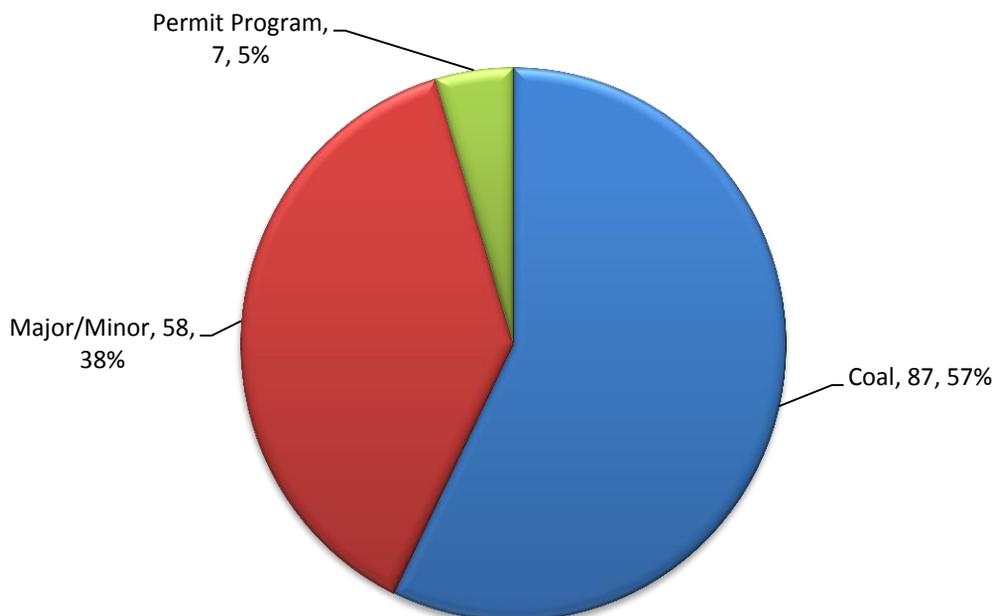
Permit Program Compliance Reviews: The Enforcement Specialist tasked with these duties researches and evaluates violations referred from specific programs within the DAQ, DWM, and DOW. The Specialist researches referred violations and reviews previous enforcement history before determining remedial measures and issuing NOVs. The specialist works in conjunction with staff from the Program Divisions to ensure accuracy with the NOVs that are issued.

In SFY 2015, Permit Program Compliance Reviews have resulted in 53 Notices of Violations issued and 7 referrals to the Civil Enforcement Branch.

Division of Enforcement Notices of Violations Issued by Review Type SFY 2015



Division of Enforcement Compliance and Operations Branch Case Referrals by Review Type SFY 2015



Referrals to the Civil Enforcement Branch: In SFY 2015, Compliance and Operation Branch sent 152 referrals from Coal, Major and Minors, Permit Program Reviews to the Civil Enforcement Branch. Each referral then becomes a case, and is assigned to an Enforcement Specialist in the Civil Enforcement Branch for further enforcement action. During the formal enforcement process, Compliance and Operations Branch staff complete up-to-date compliance reviews and serve as technical experts for the Division in settlement negotiations. The Enforcement Specialist will coordinate with Civil Enforcement Branch staff, the Director's and Commissioner's Office staff, the Office of General Council attorneys, and company representatives until final resolution is brought to the documented violations.

Compliance and Operations Branch

Administrative Duties: The COB has one staff member that is responsible for the administrative day-to-day operation of the Division. These duties include, but are not limited to: the entry and auditing of data in Integrated Compliance Information System (ICIS); the processing of civil penalties, stipulated penalties, and cost recovery payments; maintaining Division record keeping and databases; coordinating work flow through the Director's office; and providing administrative support for all staff.

In SFY 2015 Administrative Support Staff processed \$1,810,475.63 in civil and stipulated penalties and \$165,197.15 in cost recovery.

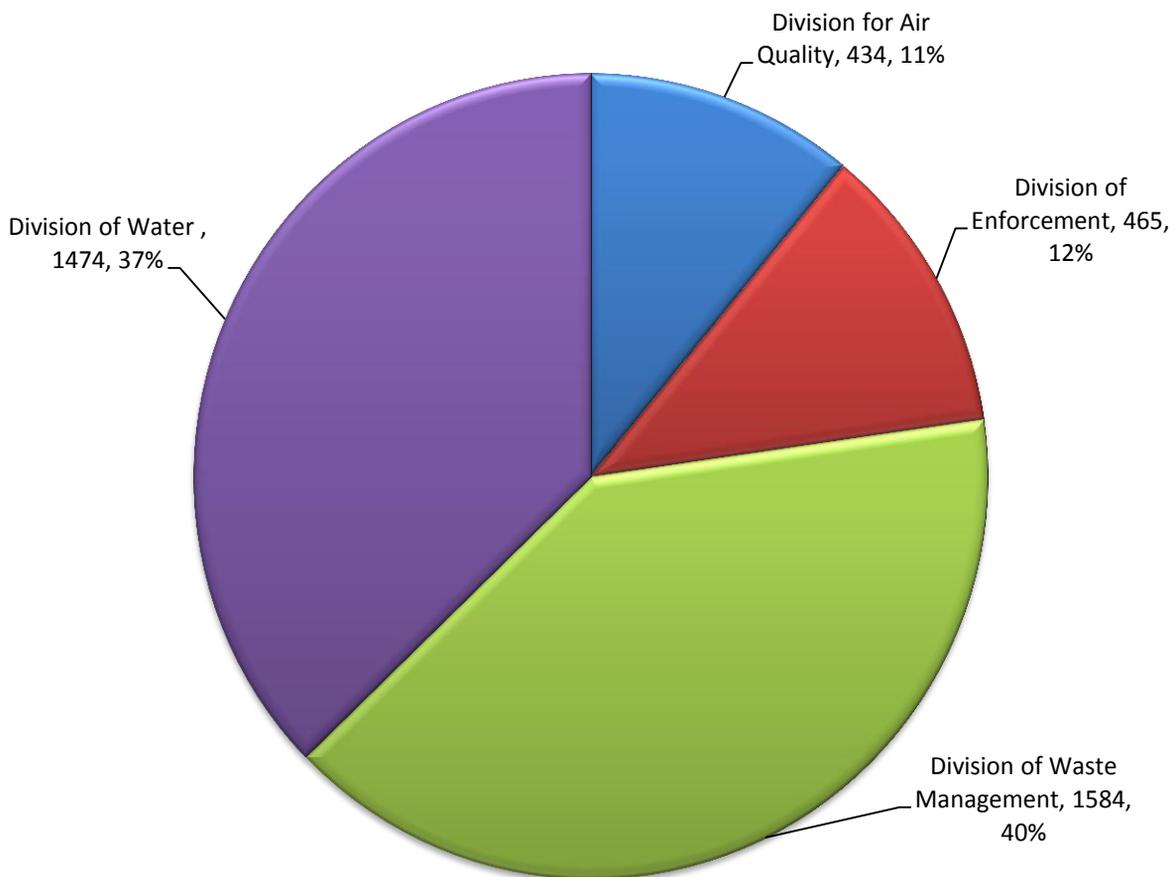


Photo Source: http://www.infobarrel.com/Top_Five_Main_Duties_of_Administrative_Professionals

Notices of Violation Issued by Division: The Department as a whole issued 3,957 Notices of Violation in SFY 2015. Notices of Violation from the Division of Enforcement made up roughly 12% of all Notices issued.

Kentucky Department for Environmental Protection

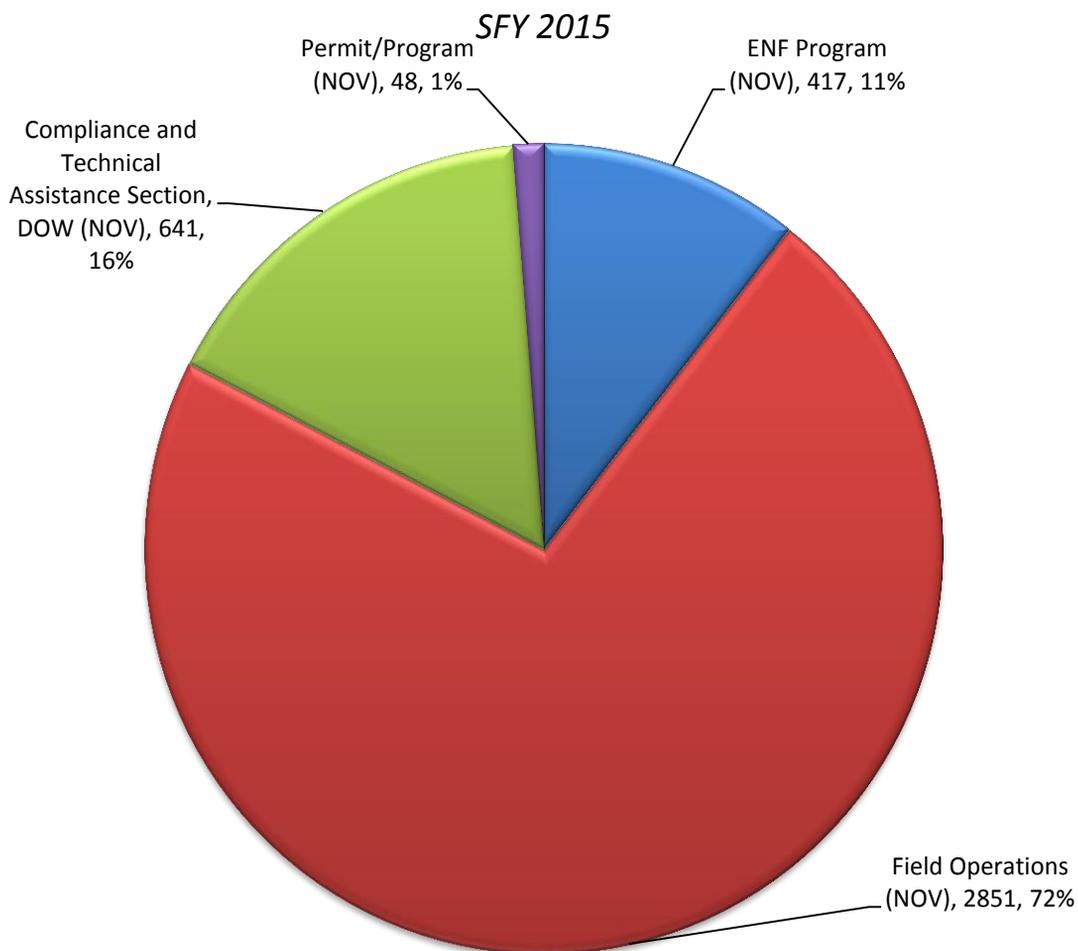
Notices of Violation Issued by Division
SFY 2015



Notices of Violation Issued by Activity Type: 72% of the Notices of Violation issued in SFY 2015 came from the Field Operations Branches. The second highest contribution was from Drinking Water Notices of Violation, issue by the Compliance and Technical Assistance Section in the Division of Water.

Kentucky Department for Environmental Protection

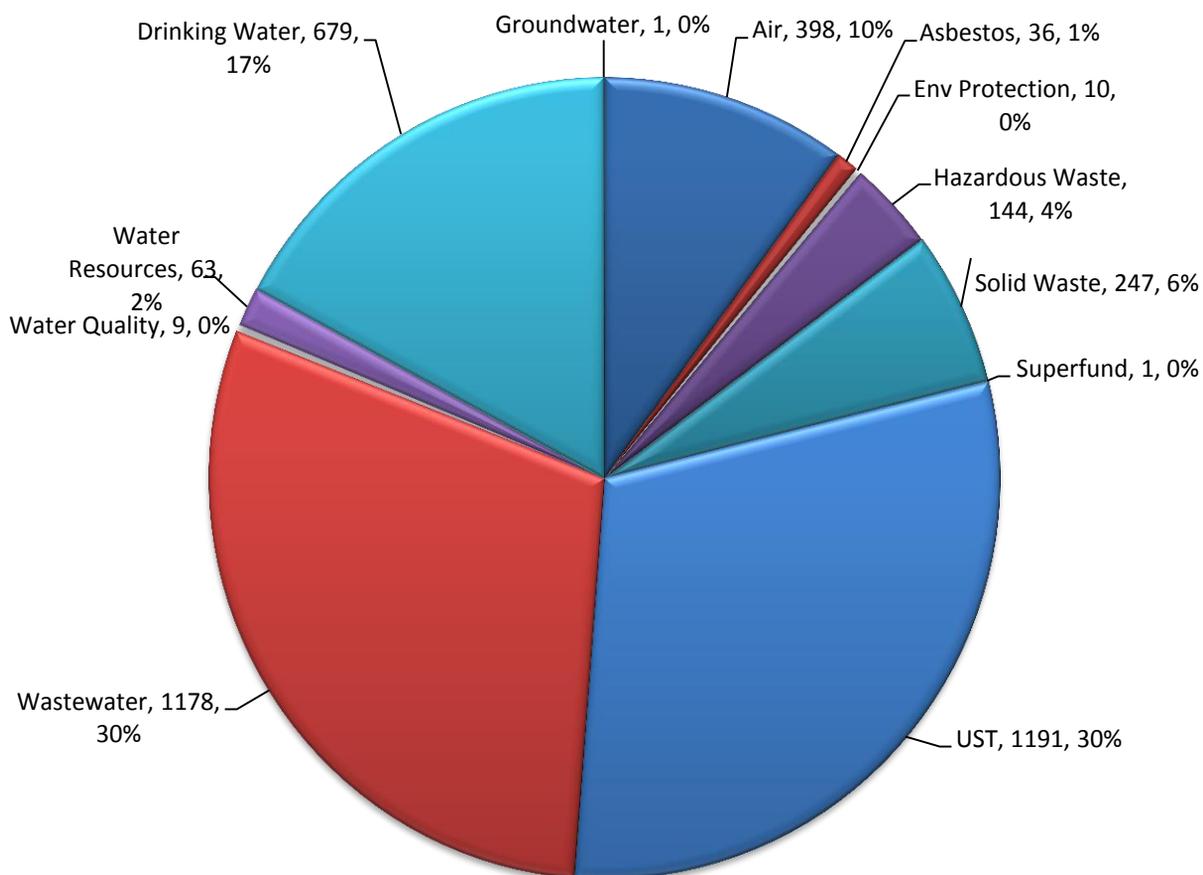
Notices of Violations Issued by Activity Type



Notices of Violation Issued by Program: In SFY 2015, the largest number of notifications issued by KDEP was in the UST program with 1191 (30%), followed by the Wastewater program with 1178 (30%), and the Drinking Water program with 679 (17%).

Kentucky Department for Environmental Protection

Notices of Violation Issued by Program
SFY 2015



Accomplishments in the Commonwealth

- **Coal Industry Compliance Reviews:** In SFY 2015, the Compliance and Operations Branch took on the project of completing a comprehensive review of every coal company in the Commonwealth. With a mix of new and veteran staff, the Branch reviewed all 305 coal companies in Kentucky. This project has required the review of thousands of Discharge Monitoring Reports and resulted in documenting hundreds of violations. As this review is an on-going project, violations will continue to be documented, Notices of Violation issued, and companies referred for further enforcement actions, to ensure environmental compliance with Kentucky's environmental regulations.
- **Working with the Office of General Counsel:** During the course of the SFY 2015, the Compliance and Operations Branch staff has worked closely with the Cabinet's Office of General Counsel (OGC), serving as technical and scientific advisors for the attorneys in ongoing enforcement actions. The COB staff has provided technical support by answering questions, leading training meetings, and preparing to testify at hearings for actions in the Office of Administrative Hearings and Franklin Circuit Court. COB's continued work with OGC on the Nally and Hamilton case has been pivotal in the execution of settlement agreements and the collection of civil and stipulated penalties. Work being completed in the Frasure Creek case is ongoing, as quarterly reviews are being completed, and new violations are cited.

Accomplishments in the Commonwealth

- **Big Run Landfill** was referred to DENF in 2012, for odor and tracking violations. Representatives of Big Administrative conferences were conducted on 2/7/2013, 6/5/2013, and 10/15/2013. On 11/27/2013, an agreement in principle was reached between Big Run and DENF. The Agreed Order, executed 1/28/2014, required Big Run to submit two (2) separate Corrective Action Plans, and pay a civil penalty in the amount of \$75,000. As a requirement of the Agreed Order, Big Run was required to pay stipulated penalties for any additional tracking or odor violation issued after the Agreed Order was executed. To date, DENF has issued ten (10) Demand Letters for Stipulated Penalties, and collected \$327,500 for additional tracking and odor violations. DENF is still monitoring the Agreed Order, and will continue to assess stipulated penalties as odor and tracking violations are observed.
- **Century Aluminum Sebree LLC** is a primary aluminum (Al) production facility. It has three potlines where molten aluminum is produced. Emissions from this process include particulates, various fluorides, and hydrogen fluoride (HF). Pots have moveable shields to direct emissions from the pots to air pollution control devices and have a maintained crust on top of the molten reactants in order to control emissions. Fluorides and HF are captured and reintroduced into pots because fluorine is essential to the chemistry of the reaction to produce Al in the elemental state. According to Century Aluminum's permit, the roof monitors for each building housing potlines must be tested monthly. Century Aluminum failed three sets of emission tests during 2013 and 2014. Four Notices of Violation were issued. Following the failed tests, Century made corrections to the potlines and passed follow up tests. The violations were considered High Priority Violations. The case was settled through a demand letter that assessed a \$45,000 civil penalty. The case was closed on June 11, 2015.

Accomplishments in the Commonwealth

- **Hunters Hollow Subdivision WWTP (Bullitt Utilities, INC.)** waste water treatment plant suffered a catastrophic structural failure that resulted in the release of over 250,000 gallons of raw sewage on March 29, 2014. DENF and the Office of General Counsel worked diligently with the utility to enter into an Agreed Order on November 24, 2014, that allowed for measure to cease the untreated discharge and allow for a permanent connection to be made to the local sewer system. To date a temporary connection has been made to convey a portion of the wastewater while a final connection is designed and constructed.
- **K-Mart store #9503** in Frankfort, Kentucky, was cited for hazardous waste violations regarding their P-listed acute hazardous waste (nicotine). The generator limit for acute hazardous waste is 2.2 lbs. per month; K-Mart was exceeding the limit by having large amounts of expired nicotine cessation products that they were disposing of (such as Nicorette gum). K-Mart conducted a Supplemental Environmental Project by contracting with a company called “Knightshade”, who reclaims nicotine from expired products for re-use, thus eliminating the waste stream. They paid a \$5,000 civil penalty in addition. The case was closed on February 18, 2015.

Division Contact Information

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Director's Office

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- **Mark Cleland**, Assistant Director, ext. 3174
- **Michael Kroeger**, Environmental Scientist IV, ext. 3619

Civil Enforcement Branch

- **Justin Schul**, Environmental Control Manager, ext. 3209
- **Phil Broomall**, Enforcement Specialist, ext. 3581
- **Beth Clemons**, Enforcement Specialist, ext. 3234
- **John Cornett**, Enforcement Specialist, ext. 3608
- **Corey Craft**, Enforcement Specialist, ext. 3286
- **Jonathan Durbin**, Enforcement Specialist, ext. 3172
- **Caleb Enix**, Enforcement Specialist, ext. 3622
- **Donald Hansel**, Enforcement Specialist, ext. 3660
- **Philip Kejzlar**, Enforcement Specialist, ext. 3604
- **Derek Polly**, Enforcement Specialist, ext. 3659

Compliance and Operations Branch

- **Natalie Bruner**, Environmental Control Manager, ext. 3180
- **Dana Back**, Enforcement Specialist, ext. 3480
- **Marlon Bascombe**, Enforcement Specialist, ext. 3620
- **Lori Conway**, Enforcement Specialist, ext. 3266
- **Tim Harrod**, Enforcement Specialist, ext. 3346
- **Linda Metts**, Enforcement Specialist, ext. 3567
- **Cabrina Pennington**, Enforcement Specialist, ext. 3221
- **Don Polly**, Enforcement Specialist, ext. 3580
- **Michelle Rice**, Enforcement Specialist, ext. 3230
- **Jacob Uhazie**, Enforcement Specialist, ext. 3430