



# FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office  
13051 North Telecom Parkway #101  
Temple Terrace, Florida 33637-0926

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

July 2, 2019

January Environmental Services, Inc.  
Mr. Cris January, Owner  
1920 State Road 60 West  
Bartow, FL 33830  
[Cris@januaryservices.com](mailto:Cris@januaryservices.com)

SUBJECT: Department of Environmental Protection v. January Environmental Services, Inc.,  
OGC File No.: 19-1271  
HW Facility ID #FLD982162943  
Polk County

Mr. January:

The State of Florida Department of Environmental Protection (“Department”) finds that January Environmental Services, Inc. (“Respondent”) managed used oil in violation of the rules cited in the attached inspection report. Before sending this letter, the Department requested that the Respondent undertake certain actions to resolve the violations. These actions have since been completed. However, due to the nature of the violations, the Respondent remains subject to civil penalties. The Respondent is also responsible for costs incurred by the Department during the investigation of this matter.

### **The Department’s Offer**

Based on the violations described above, the Department is seeking \$1,250.00 in civil penalties and \$250.00 for costs and expenses the Department has incurred in investigating this matter, which amounts to a total of \$1,500.00. The civil penalties are apportioned as follows: \$625.00 for violation of Rule 62-710.500(1), 62-710.500(2), & 62-710.850(3), F.A.C.; \$625.00 for violation of Rule 62-710.510(5), F.A.C.

### **Respondent’s Acceptance**

If you wish to accept this offer and fully resolve the enforcement matter pending against the Respondent, please sign this letter and return it to the Department at the Southwest District, 13051 N. Telecom Parkway, Suite 101, Temple Terrace, FL 33637 by **July 12, 2019**. The Department will then countersign it and file it with a designated clerk of the Department. Once the document is filed with the designated clerk, it will constitute a final order of the Department pursuant to Section 120.52(7), F.S. and will be effective unless a request for an administrative hearing is filed by a third party in accordance with Chapter 120, F.S. and the attached Notice of Rights.

By accepting this offer you, **Cris January, President of January Environmental Services, Inc.**:

- (1) certify that you are authorized and empowered to negotiate, enter into, and accept the terms of this offer in the name and on behalf of Respondent;
- (2) acknowledge and waive Respondents' right to an administrative hearing pursuant to Sections 120.569 and 120.57, F.S., on the terms of this offer, once final;
- (3) acknowledge and waive Respondent's right to an appeal pursuant to Section 120.68, F.S.

The Department acknowledges that the Respondent's acceptance of this offer does not constitute an admission of liability for the violations referenced above.

### **Respondent's Performance**

After signing and returning this document to the Department,

- (1) Respondent must pay \$1,500.00 in full by **July 31, 2019**.
- (2) Respondent shall make all payments required by this Order by cashier's check, money order or on-line payment. Cashier's check or money order shall be made payable to the "Department of Environmental Protection" and shall include both the assigned "OGC number 19-1271" and the notation "Water Quality Assurance Trust Fund." Online payments by e-check can be made by going to the DEP Business Portal at: <http://www.fldepportal.com/go/pay/>  
It will take a number of days after this order is final and effective filed with the Clerk of the Department before ability to make online payment is available.

The Department may enforce the terms of this document, once final, and seek to collect monies owed pursuant to Sections 120.69 and 403.121, F.S.

Until clerked by the Department, this letter is only a settlement offer and not a final agency action. Consequently, neither the Respondent nor any other party may request an administrative hearing to contest this letter pursuant to Chapter 120, F.S. Once this letter is clerked and becomes a final order of the Department, as explained above, the attached Notice of Rights will apply to parties, other than the Respondent, whose interests will be substantially affected.

Electronic signatures or other versions of the parties' signatures, such as .pdf or facsimile, shall be valid and have the same force and effect as originals. No modifications of the terms of this Order will be effective until reduced to writing, executed by both Respondent and the Department, and filed with the clerk of the Department. Please be aware that if the Respondent declines to respond to the Department's offer, the Department will assume that the Respondent is not interested in resolving the matter and will proceed accordingly.

DEP v. January Environmental Services, Inc.  
Proposed Consent Order, OGC File No.: 19-1271

If you have any questions, please contact Leslie Pedigo at (813) 470-5870 or at [Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov).

Sincerely,



Mary E. Yeargan, P.G.  
District Director  
Southwest District

Draft copy furnished to:

Loren January Dorwart, January Environmental Services, Inc.;  
[Loren@januaryservices.com](mailto:Loren@januaryservices.com)

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FOR THE RESPONDENT:

I, \_\_\_\_\_ [Type or Print Name], **HEREBY ACCEPT THE TERMS OF THE SETTLEMENT OFFER IDENTIFIED ABOVE.**

By: \_\_\_\_\_ Date: \_\_\_\_\_  
[Signature]

Title: \_\_\_\_\_  
[Type or Print]

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**FOR DEPARTMENT USE ONLY**

DONE AND ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2019, in Hillsborough County, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

\_\_\_\_\_  
Mary E. Yeargan, P.G.  
District Director  
Southwest District

Filed, on this date, pursuant to section 120.52, F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

Attachments: Notice of Rights  
Penalty Assessment Worksheet  
3/8/2019 Inspection Report

Final clerked copy furnished to:

Loren January Dorwart, January Environmental Services, Inc.;

[Loren@januaryservices.com](mailto:Loren@januaryservices.com)

Lea Crandall, Agency Clerk; [Lea.Crandall@FloridaDEP.gov](mailto:Lea.Crandall@FloridaDEP.gov)

## PENALTY COMPUTATION WORKSHEET

Violator's Name: January Environmental Services, Inc.

Identify Violator's Facility: FLD982162943

Name of Department Staff Responsible for the Penalty Computations: Leslie Pedigo

Date: 5/28/2019

	Violation Type	Manual Guide	ELRA Schedule	ELRA Amount	Multi Day	Other Adjustment	Total
1.	40 CFR 279.54(f) & 62-710.401(6), F.A.C. – Failure to properly label used oil drums. Resolved with email provided on 5/28/2019	UO 145	403.121(5)	\$500.00			\$0.00
2.	62-710.500(1), 62-710.500(2), & 62-710.850(3) F.A.C. - Failure to complete annual registration for used oil and used oil filter transporters for the 2018-2019 registration year; Failure to timely complete annual registration for used oil and used oil filter transporters for the 2019-2020 registration year.	UO 25 & UO 33	403.121(4)(f)	\$500.00		\$125.00	\$625.00
3.	62-710.510(5), F.A.C. – Failure to submit an Annual Report by Used Oil and Used Filter Handlers for 2017 or 2018 by March 1 of the following year.	UO 52	403.121(4)(f)	\$500.00		\$125.00	\$625.00
4.	62-710.600(2)(c), F.A.C. – Failure to provide driver training for 2017 2018 and 2019 (if due). Resolved with records provided during the 5/24/2019 meeting.	UO 64	403.121(4)(e)	\$1,000.00			\$0.00
SUB-TOTAL							\$1,250.00
DEPARTMENT COSTS							250.00

Total Penalties Including Department Costs: \$1,500.00

*Kelley M. Bootwright for:*

Mary E. Yeargan, P.G.  
Southwest District Director  
Florida Department of Environmental Protection

07/02/2019  
Date

WORKSHEET  
ELRA PENALTY DETERMINATION

FACILITY NAME: January Environmental Services, Inc. Date: April 15, 2019

EPA ID No.: FLD982162943 Case #: OGC# 19-1271

**403.121(4)(e)** In an administrative proceeding, in addition to the penalties that may be assessed under subsection (3), the department shall assess administrative penalties according to the following schedule:

(e) For failure to maintain required staff to respond to emergencies; **failure to conduct required training**; failure to prepare, maintain, or update required contingency plans; failure to adequately respond to emergencies to bring an emergency situation under control; or failure to submit required notification to the department, \$1,000.

**403.121(4)(f)** In an administrative proceeding, in addition to the penalties that may be assessed under subsection (3), the department shall assess administrative penalties according to the following schedule:

(f) Except as provided in subsection (2) with respect to public water systems serving a population of more than 10,000, for **failure to prepare, submit, maintain, or use required reports or other required documentation**, \$500.

**403.121(5)** Except as provided in subsection (2) with respect to public water systems serving a population of more than 10,000, for **failure to comply with any other departmental regulatory statute or rule requirement** not otherwise identified in this section, the department may assess a penalty of \$500.

## ECONOMIC BENEFIT WORKSHEET

FACILITY NAME: January Environmental Services, Inc. Date: April 15, 2019

EPA ID No.: FLD982162943 Case #: OGC#19-1271

Violation: 40 CFR 279.54(f) & 62-710.401(6) F.A.C. – Failure to properly label used oil drums:

The avoided costs for labeling used oil containers are negligible, therefore the avoided or delayed costs are negligible, and consist of only staff time to attach correct labels.

Violation: 62-710.500(1) & (2), 62-710.600(2), & 62-710.850(3) F.A.C. - Failure to complete annual registration for used oil and used oil filter transporters for the 2018-2019 registration year; Failure to timely complete annual registration for used oil and used oil filter transporters for the 2019-2020 registration year:

The avoided costs for completing the required registration paperwork is estimated to be less than \$300, therefore the avoided or delayed costs are negligible, and consist of only staff time to complete and submit required paperwork.

Violation: 62-710.510(5), F.A.C. – Failure to submit an Annual Report by Used Oil and Used Filter Handlers for 2017 or 2018 by March 1 of the following year:

The avoided costs for completing the Annual Report by Used Oil and Used Filter Handlers is estimated to be less than \$300, therefore the avoided or delayed costs are negligible, and consist of only staff time to complete and submit required paperwork.

Violation: 62-710.600(2)(c), F.A.C. – Failure to provide driver training for 2018 or 2019:

The avoided costs for providing drive training, which is conducted in-house, is estimated to be less than \$300, therefore the avoided or delayed costs are negligible, and consist of only staff time to provide training.

EB = Avoided Costs (1-C) + Delayed Costs (T)

C = Current Corporate Tax Rate = .34 (2017 values)

T = IRS Interest Rate = 3% per year

All Violations:

Avoided Costs = Estimated to be less than \$300

Delayed Costs = Estimated to be less than \$300

EB = assessment is not required per guidelines

[https://fldeploc.dep.state.fl.us/appdata/rcra\\_epa/Guidance/Econ\\_Benefit\\_Calc\\_Guide.pdf](https://fldeploc.dep.state.fl.us/appdata/rcra_epa/Guidance/Econ_Benefit_Calc_Guide.pdf)

## HISTORY OF NON-COMPLIANCE WORKSHEET

FACILITY NAME: January Environmental Services, Inc. Date: April 15, 2019

EPA ID No.: FLD982162943 Case #: OGC# 19-1271

Based on an inspection conducted on May 23, 2017, Short Form Consent Order #17-1137 was executed on February 8, 2018 for: failure to timely renew permit; failure to provide secondary containment for a trailer storing oil; and violation of specific condition 45 of the facility permit (not keeping a halogen monitoring device or test kit was in the pump truck).

Violation: 40 CFR 279.54(f) & 62-710.401(6) F.A.C. – Failure to properly label used oil drums:

This is not a repeat violation. As such, a history of non-compliance increase will not be applied.

Violation: 62-710.500(1) & (2), 62-710.600(2), & 62-710.850(3) F.A.C. - Failure to complete annual registration for used oil and used oil filter transporters for the 2018-2019 registration year; Failure to timely complete annual registration for used oil and used oil filter transporters for the 2019-2020 registration year:

While this is not the same violation, the facility failure to timely renew their permit in 2017; this violation is similar. As such, a history of non-compliance increase of 25% was applied.

Violation: 62-710.510(5), F.A.C. – Failure to submit an Annual Report by Used Oil and Used Filter Handlers for 2017 or 2018 by March 1 of the following year:

While this is not the same violation, the facility failure to timely renew their permit in 2017; this violation is similar. As such, a history of non-compliance increase of 25% was applied.

Violation: 62-710.600(2)(c), F.A.C. – Failure to provide driver training for 2018 or 2019:

This is not a repeat violation. As such, a history of non-compliance increase will not be applied.





**Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report**

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**FACILITY INFORMATION:**

**Facility Name:** January Environmental Services Inc  
**On-Site Inspection Start Date:** 03/08/2019      **On-Site Inspection End Date:** 03/08/2019  
**ME ID#:** 46304      **EPA ID#:** FLD982162943  
**Facility Street Address:** 1920 Hwy 60 W Main St, Bartow, FL 33830-0000  
**Contact Mailing Address:** 1920 Highway 60 West, Bartow, FL 33830  
**County Name:** Polk      **Contact Phone:** (863) 534-8478

**NOTIFIED AS:**

Non-Handler

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter facility  
Routine Inspection for Used Oil Transfer Facility facility  
Routine Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Leslie Pedigo, Inspector  
**Other Participants:** Lindsay Sartory, Environmental Specialist II; Loren Dorwart

**LATITUDE / LONGITUDE:** Lat 27° 53' 51.5901" / Long 81° 51' 47.2672"

**NAIC** 562111 - Solid Waste Collection

**TYPE OF OWNERSHIP:** Private

**Introduction:**

January Environmental Services (January) was inspected to determine the facility's compliance with used oil transporter and transfer facility rules. The facility was originally notified as a small quantity generator on March 25, 1988, under the name Ashland Chemical Company. The 5.18-acre property was sold to January Environmental on October 20, 2004 and the notification was changed to Used Oil Transporter, Transfer Facility, Marketer and Filter Transporter. The company's current used oil processor permit (307171-HO-004) was issued on December 7, 2017 and expires on December 7, 2022. The facility later applied for and obtained a permit as a used oil processor in order to be able to store oil more than 35 days. The facility currently does not market used oil fuel directly to burners. The Department has conducted numerous Hazardous Waste inspections of this facility, most recently on May 23 and 31, 2017. Loren Dorwart (formerly January) accompanied the inspectors during the March 8, 2019, inspection.

**Process Description:**

January is a used oil, used oil filter and oily waste transporter and storage facility and a wastewater transporter. The facility has not completed their 2018-2019 Used Oil Transporter/Used Oil Filter registration which should have been submitted by March 1, 2018. Based on this, the Department issued a letter to January on August 23, 2018, notifying them that they were no longer authorized to transport, or market used oil, or used oil filters. Additionally, the 2019-2020 Used Oil Transporter/Used Oil Filter registration has not been submitted by March 1, 2019 as required. The most recent Certificate of Liability Insurance, effective from January 25, 2019 through January 25, 2020, was submitted to the Department on February 20, 2019. The Annual Report by Used Oil and Used Filter Handlers was not submitted by March 1, 2018, for 2017; nor has the Annual Report by Used Oil and Used Filter Handlers was not submitted by March 1, 2019, for 2018.

The facility does not have full time office employees; Mrs. Dorwart provides administrative services as needed. For the past several years, two drivers work from this location (Leandro Torres and Cruz Torres). The facility picks up waste products from its customers. Wastewater is not brought back to the facility but transported directly to Aqua Clean Environmental Company (EPA ID #FLR000193466) for processing. Used

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oil, oily water and used oil filters are consolidated and stored on-site prior to transportation for final treatment and disposal. Mrs. Dorwart stated that the used oil side of the business at this location has been much reduced as January lost a customer that was responsible for most of their used oil volume. January does not accept used oil or oily water from other transporters. The facility does not collect public used oil. While January was processing used oil using a centrifuge and a vibratory screen in the past, all processing equipment was removed from the facility in the spring of 2017.

At the time of this inspection, the facility's wastewater truck was on the road and Used Oil Truck #15 was parked next to the rail car loading rack on the north side of the facility. The TIF XL-1A meter, which usually kept in Used Oil Truck #15, was available for inspection in the facility's laboratory. The meter is used to screen used oil for halogen content prior to accepting the used oil from their customers. Tanker Trailer #113, which was empty, was located on the east side of the main building. No rail cars were on-site at the time of the inspection. According to Mrs. Dorwart, the most recent rail shipment was for 20,000-gallons of used oil on January 3, 2019.

The facility has six white 24,000-gallon aboveground storage tanks (ASTs) which are used to store used oil. These ASTs are registered with the Department's Storage Tank Program, facility ID # 53/ 9101026. The electronic gauge was not functional at the time of the inspection. According to Mrs. Dorwart, Tank #103 contained approximately 1,500-gallons of used oil and Tank #106 contained approximately 15,000-gallons of used oil; and the remaining tanks (Tank #101, Tank #102, Tank #104, and Tank #105) were empty. At the time of the inspection the containment around the tank farm was in good repair, did not contain any free liquids, and appeared to be adequate to contain the volume of the tanks

A green AST has been installed in a separate containment area attached to the existing containment; at the time of the inspection this tank was empty. A second green AST and two silver AST were observed laying on their sides in the yard west of the tank farm; all three are empty. Please note that if any of these ASTs is to be used to store regulated materials they must comply with all regulatory requirements. Regulated tanks are required to be registered 30 days prior to installation, or within 30 days of changing from a waste water or process tank to a regulated used oil storage tank. In addition, a permit modification may be needed if the storage capacity of the facility is increased. Nineteen, mostly empty, used oil filter bins were present on the paved area west of the tank farm. An empty tanker trailer was also located in this area along with and two roll-off containers. According to Mrs. Dorwart, the roll offs contained yard waste and scrap material. Waste solids from the used oil operations were not present at the time of the inspection.

While most used oil collected from their clients is pumped into Used Oil Truck #15, some of their clients collect these wastes in drums which are brought back to the facility. Drummed used oil is stored inside the warehouse prior to being pumped out of the drums to the used oil tanks. Used oil filters are consolidated into the used oil bins until there are enough for a shipment. Several containers of waste from clients were observed within the main building storage area: two 55-gallon metal drums labelled "waste oil;" six bins of used oil filters; and one 55-gallon metal drum of used oil filters were observed. Please note that mislabeled used oil drums from clients should be correctly relabeled as "used oil" while being stored at the facility. Additionally, several containers generated by January were also stored in the warehouse: two properly labeled polypropylene drums used to collect used oil samples, one polypropylene properly labeled drum of oily pads.

Outbound shipments of used oil were shipped to Aaron Oil, Saraland, Alabama (EPA ID #ALD983180233) until the end of 2016/beginning of 2017. Since that time, all outbound shipments go to January Environmental Services in Oklahoma (EPA ID #OKD042146324). Used oil filters are being sent to US Foundry in Miami.

Paperwork review during the inspection include four outbound shipments of used oil via road (two 5,500-gallon shipments on October 23, 2018, one 5,500-gallon shipment on October 24, 2108, and one 5,500-gallon shipment on November 1, 2018) and one outbound shipment of 20,000-gallon of used oil vial rail on January 3, 2019. Four inbound bills of lading from 2018 were reviewed: 650-gallons of used oil May 30, 2018; 1 bin of used oil filters on October 3, 2018; 375-gallons of used oil on October 5, 2018, and 475-gallons of used oil on December 27, 2018. All EPA identification numbers of the oil provider or designated facility were typically included on the bill of lading along with the results of the halogen screening performed prior to accepting used oil. The Department requests submittal of additional inbound and outbound records.

Training records have not been provided as requested during the records review. Records of driver training for 2018 and 2019 were not available on site. Daily inspections were present for days when the facility is

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open and monthly storage tank inspection records are maintained.

**New Potential Violations and Areas of Concern:****Violations**

Type: Violation  
Rule: 279.54(f), 62-710.401(6)  
Explanation: 40 CFR 279.54(f) and 62-710.401(6) F.A.C.:

Two 55-gallon metal drums labelled "waste oil;" six bins of used oil filters; and one 55-gallon metal drum of used oil filters were observed inside the warehouse. Containers and tanks used to store used oil must be clearly labeled with the words "used oil."

Corrective Action: Immediately relabel the drums as "used oil." Any mislabeled drums picked up from customers must be properly labeled when they arrive on-site.

**Photo Attachments:**

Drums labeled "waste oil" located inside the warehouse.



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Type: Violation  
Rule: 62-710.500(1), 62-710.500(1)(a), 62-710.600(2)(a), 62-710.850(3)  
Explanation: 62-710.500(1): Failure to annually register used oil handling activities  
62-710.500(2): Failure to register used oil handling activities by March 1st of each year  
62-710.600(2)(a): Failure to become certified and to maintain certification by not registering annually and not complying with reporting and record keeping requirements  
62-710.850(3): Failure to register as a used oil filter transporter

The facility has not completed their 2018-2019 Used Oil Transporter/Used Oil Filter registration which should have been submitted by March 1, 2018. Based on this, the Department issued a letter to January on August 23, 2018, notifying them that they were no longer authorized to transport, or market used oil, or used oil filters. Additionally, the 2019-2020 Used Oil Transporter/Used Oil Filter registration has not been submitted by March 1, 2019 as required.

Corrective Action: Immediately submit all required documentation for the 2018-2019 and 2019-2020 registration for Used Oil and Used Oil Filter Transporters.

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Type: Violation

Inspection Date: 03/08/2019

Rule: 62-710.510(1)

Explanation: 62-710.510(5), F.A.C.  
The Annual Report by Used Oil and Used Filter Handlers was not submitted by March 1, 2018, for 2017; nor has the Annual Report by Used Oil and Used Filter Handlers was not submitted by March 1, 2019, for 2018.

Corrective Action: Immediately submit the Annual Report by Used Oil and Used Filter Handlers for 2017 and 2018.

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Type: Violation

Rule: 62-710.600(2), 62-710.600(2)(c)

Explanation: 62-710.600(2)(c), F.A.C.:

Records of driver training for 2018 and 2019 were not available on site.

Corrective Action: Immediately provide the 2018 and 2019 (if due at this time) driver training records to the Department for review.

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**PHOTO ATTACHMENTS:**

Used oil storage tanks, rail car loading rack, & Used Oil Truck #15.



Storage of customers wastes inside the warehouse.



Facility generated waste drums inside the warehouse.



19 used oil filter bins and empty tanker trailer in facility yard.



**Conclusion:**

The facility is not in compliance with state and federal hazardous waste regulations at the time of the inspection.

Inspection Date: 03/08/2019

**1.0 - Pre-Inspection Checklist**

## Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Inspection Date: 03/08/2019

**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C.

Leslie Pedigo	Inspector
<b>Principal Inspector Name</b>	<b>Principal Inspector Title</b>

<i>Leslie Pedigo</i>	DEP	04/17/2019
<b>Principal Inspector Signature</b>	<b>Organization</b>	<b>Date</b>

Lindsay Sartory	Environmental Specialist II
<b>Inspector Name</b>	<b>Inspector Title</b>
	FDEP/SWD
	<b>Organization</b>

Loren Dorwart	
<b>Representative Name</b>	
	January Environmental Services, Inc.
	<b>Organization</b>

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

**Report Approvers:**

Approver: Shannon Kennedy	Inspection Approval Date: 04/17/2019
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