



## REGION 9

SAN FRANCISCO, CA 94105

Sent Via Email: [jen@relucent.com](mailto:jen@relucent.com)  
RETURN RECEIPT REQUESTED

Jen Griggs  
General Manager  
Relucent Solutions  
1415 N Dutton Ave  
Santa Rosa, CA 95401

Re: EXPEDITED SETTLEMENT OPPORTUNITY  
Notice of Investigation Results under the Resource Conservation and Recovery Act  
Relucent Solutions  
EPA ID Number: CAL000398998  
Docket Number: RCRA-09-2025-0035

Dear Jen Griggs:

Representatives from the U.S. Environmental Protection Agency ("EPA"), Region 9, have identified a potential violation of the Resource Conservation and Recovery Act ("RCRA") (42 U.S.C. § 6901 *et seq.*) and the authorized California hazardous waste management program at Relucent Solutions, located at 1415 N Dutton Ave, Santa Rosa, California.<sup>1</sup>

By this letter, EPA is providing you with an opportunity to quickly resolve the violation by entering into an Expedited Settlement Agreement. EPA has authority to pursue civil penalties for the violation of RCRA requirements, including violations that are easily identifiable and easily correctable, such as the violation cited below. You may resolve the alleged violation by correcting the violation cited below, paying the specified penalty, and signing and returning the enclosed Expedited Settlement Agreement within 30 days of your receipt of this letter.

If you dispute this violation, please provide a written explanation, along with any documentation to Tara Frost at the address below within 30 days of your receipt of this letter.

As a result of the EPA file review of your facility, Relucent Solutions failed to comply with the following RCRA regulation:

[1] – Failure to Perform a Waste Determination

The Respondent failed to comply with the waste determination requirements in violation of Title 22

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<sup>1</sup> See, e.g., Section 3006 of RCRA, 42 U.S.C. § 6906.

California Code of Regulations ("CCR") § 66262.11 [40 Code of Federal Regulations ("CFR") § 262.11].

**[2] – Failure to Determine Generator Category**

The Respondent failed to determine its generator category in violation of Title 22 CCR § 66162.13 [40 CFR § 262.13].

**[3] – Failure to Close a Hazardous Waste Container**

The Respondent failed to meet the conditions for exemption for satellite accumulation; specifically, failed to keep a Satellite Accumulation Area (SAA) hazardous waste container closed at all times, except when adding, removing or consolidating waste in violation of Title 22 CCR § 66262.15(a)(4) [40 CFR § 262.15(a)(4)].

**[4] – Failure to Inspect Weekly**

The Respondent failed to inspect Central Accumulation Areas (CAAs) at least weekly in violation of Title 22 CCR § 66262.17(a)(1)(E) [40 CFR § 262.17(a)(1)(v)].

**[5] – Failure to Place Signs Near Ignitable Waste**

The Respondent failed to conspicuously place "No Smoking" signs in a location where there is a hazard from ignitable waste in violation of Title 22 CCR § 66262.17(a)(1)(F)(2) [40 CFR § 262.17(a)(1)(vi)(B)].

**[6] – Failure to Label a Hazardous Waste Container**

The Respondent failed to meet the requirements to accumulate hazardous waste on site without a permit or interim status; specifically, failure to properly label a CAA container in violation of Title 22 CCR § 66262.17(a)(5) [40 CFR § 262.17(a)(5)].

**[7] – Failure to Develop Training Program**

Failure to meet the requirements to accumulate hazardous waste on site without a permit or interim status; specifically, failure to ensure that facility personnel successfully complete the training program through classroom, computer-based, or electronic instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with the requirements of Title 22 CCR Division 4.5 Chapter 12 and Title 8 CCR section 5192, subsection (p) in violation of Title 22 CCR § 66262.17(a)(7)(A) [40 CFR § 262.17(a)(7)(i)].

**[8] – Failure to Train Personnel**

The Respondent failed to meet the requirements to accumulate hazardous waste on site without a permit or interim status; specifically, failure to ensure that facility personnel take part in an annual review of the initial training and to complete training within six months of assignment in violation of Title 22 CCR § 66262.17(a)(7)(B)-(C) [40 CFR § 262.17(a)(7)(ii)-(iii)].

**[9] – Failure to Obtain EPA Identification Number**

The Respondent failed to receive an EPA identification number from the Administrator by applying to the Department of Toxic Substances Control (DTSC) using EPA form 8700-12 prior to offering hazardous waste for transportation and failed to re-notify the Department in even-numbered years in violation of Title 22 CCR § 66262.18 [40 CFR § 262.18].

**[10] – Failure to submit a Biennial Report**

The Respondent failed to complete and submit a Biennial Report, using U.S. EPA Form 8700-13A/B to the Department of Toxic Substances Control by March 1, 2024, for the 2023 reporting year in violation of Title 22 CCR § 66262.41(b) [40 CFR § 262.41(b)].

**Opportunity for Expedited Settlement**

Under the authority of Section 3008 of RCRA, 42 U.S.C. § 6928, EPA may pursue civil penalties of up to \$93,058 per day for each violation of Subtitle C of RCRA, including violation of approved and authorized State program requirements.

However, EPA is offering to resolve the violation described above with an Expedited Settlement Agreement (Agreement), which provides you the opportunity to quickly resolve the violation with payment of a substantially reduced penalty. If you choose to sign the Agreement and EPA determines you have satisfied the requirements for expedited settlement described below, then EPA will settle the violation listed above for \$13,750.

**Procedure for Expedited Settlement**

To take advantage of the Expedited Settlement offer, within 30 days of your receipt of this letter, you must:

- (1) Correct the outstanding violation. This must be documented on the enclosed document titled “Injunctive Relief Worksheet.”
- (2) Complete and return to EPA the enclosed Agreement. By signing the Agreement, you are certifying that you: (a) have corrected the violation; (b) have submitted true and accurate documentation of compliance; and (c) have paid the civil penalty of \$13,750. Also, by signing the Agreement, you agree to waive your opportunity for a hearing or appeal concerning the violation.
- (3) Pay the assessed penalty of \$13,750. Instructions for payment of the penalty can be found at: <https://www.epa.gov/financial/makepayment>.

Within 24 hours of payment, please email a PDF copy of the signed Agreement and proof of payment (e.g., a copy of the check, digital payment receipt or a statement of affirmation regarding electronic funds transfer), including Respondent’s name, complete address, and docket number to the below-listed EPA contacts.

Regional Hearing Clerk  
U.S. Environmental Protection Agency  
[R9HearingClerk@epa.gov](mailto:R9HearingClerk@epa.gov)

and

Captain Tara Frost  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California, 94105  
[frost.tara@epa.gov](mailto:frost.tara@epa.gov)

If you can demonstrate, in writing, that it is technically infeasible or impracticable to correct your RCRA violation then within thirty days, upon request, EPA, at its discretion, may grant an extension. Extension requests and the above demonstration must be made in writing no later than ten days before the end of the initial 30-day compliance period. The request must clearly indicate whether you intend to take advantage of the expedited settlement agreement. Any extensions must be granted in writing by EPA.

If you do not follow the procedures outlined in this letter for expedited settlement within 30 days of receipt of this letter, then this settlement offer will be automatically withdrawn, without prejudice to the EPA's ability to file a complaint for the cited violation. EPA may seek penalties of up to \$93,058 per day for the violation cited above.

We are committed to the fair and rapid settlement of this matter. If you have any questions or wish to discuss the general circumstances of your case, please contact Tara Frost of my staff at (415) 972-3481 and/or [frost.tara@epa.gov](mailto:frost.tara@epa.gov).

Sincerely,

AMY MILLER-  
BOWEN

Digitally signed by AMY  
MILLER-BOWEN  
Date: 2025.03.18  
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Amy C. Miller-Bowen, Division Director  
Enforcement and Compliance Assurance Division

Cc:

Kristine Schaefer-Green, California Department of Toxic Substances Control, [kristine.schaefer-green@dtsc.ca.gov](mailto:kristine.schaefer-green@dtsc.ca.gov)

Leslie Johnson, California Department of Toxic Substances Control, [leslie.johnson@dtsc.ca.gov](mailto:leslie.johnson@dtsc.ca.gov)

April Ranney, California Department of Toxic Substances Control, [april.ranney@dtsc.ca.gov](mailto:april.ranney@dtsc.ca.gov)

Attachments:

- 1) ESA Offer
- 2) Injunctive Relief Worksheet