

1 BEFORE THE ADMINISTRATOR
2 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
3 DOCKET # EPA-HQ-OEM-2015-0725

4 In the Matter of:

5 Failure of the EPA to Require Plains All American Pipeline (Rancho LPG LLC) To Submit a
6 “Realistic” Worst Case Blast Radius Impact Report, and Failure to Address Other
7 Unsafe and Non-Compliant Issues of Operation by Rancho LPG.

8
9 **PETITION TO EPA TO RE-EXAMINE THE RISKS ASSOCIATED WITH THE**
10 **PLAINS/RANCHO LPG FACILITY (LOCATED AT 2110 N. Gaffey Street – San**
11 **Pedro/Wilmington, CA) AND TO REQUIRE PLAINS ALL AMERICAN PIPELINE**
12 **(RANCHO LPG LLC) TO RESUBMIT RANCHO LPG LLC’S (SEVERLY MINIMIZED)**
13 **WORST CASE BLAST RADIUS REPORTING TO THE EPA (UNDER RULE 40 CFR PART 68 .25)**
14 **USING THE PROPER “TNT” EQUIVELANCY CALCULATION FOR ALL FLAMMABLES**

15
16 **I. BACKGROUND**

17 SAN PEDRO PENINSULA HOMEOWNERS UNITED, INC. TONGVA ANCESTRAL
18 TERRITORIAL TRIBAL NATION, (jointly “Petitioners”) respectfully petition the Environmental
19 Protection Agency (“EPA”) to re-examine the safety hazard of the Plains All American Pipeline/Rancho
20 LPG LLC (“Rancho LPG”) facility and make the necessary changes under their control that will better
21 identify risks to the general public from this massive 25 million gallon liquefied petroleum gas storage
22 facility.

23 The natural gas pipeline explosion in San Bruno in 2015 intensified scrutiny over pipeline safety and
24 maintaining sound regulations to protect communities in close proximity to potential hazards. The San
25 Bruno explosion led to eight deaths, sixty injuries and destroyed thirty-eight homes. It took first
26 responders 30 minutes to assess the cause of the explosion as a pipeline explosion.

27 The Rancho LPG facility located at 2110 N. Gaffey Street, Wilmington, CA poses just as serious
28 danger to the community. The Rancho LPG facility in is the middle of a heavily populated section of Los

1 Angeles, near multiple residences and schools, a just a few feet away from oil refinery and the Port of Los
2 Angeles. In 1997, the California Public Utilities Commission (CPUC) Report on the Rancho LPG facility
3 pointed out that Petrolane, the previous operator. Had multiple deficiencies in its operations, as
4 highlighted:

5 “Design work on the \$9 million dollar Petrolane facility started in April 1972.

6 Construction commenced in the fall of 1972 and the terminal went on stream
7 in May, 1973 without permits from the City of Los Angeles for the storage of
8 25+ million gallons of propane and butane.”

9 “The City of Los Angeles Department of Building and Safety determined that

10 Petrolane’s low temperature liquefied petroleum gas (LPG) tanks were not exempt
11 from the Los Angeles Municipal Code as originally indicated. Accordingly,

12 April 20, 1977 the department issued an order to comply with Petrolane Inc, which

13 directed the company to file plans and obtain building permits for the two low

14 Temperature LPG storage tanks. The review will include a check to insure their ability
15 to resist seismic loading.”

16 “It appears unlikely that the low temperature storage tanks would rupture unless
17 due to an act of war, sabotage, aircraft collision, or other extreme conditions. Due
18 to the proximity, the greatest potential for earthquake damage appears to be from
19 The Palos Verdes fault.”

20 “The impoundment basin is capable of containing the liquid contents of only one
21 300,000 Bbl tank. Should both tanks rupture, the impoundment basin is obviously
22 unable to contain the total possible spillage.”

23 Despite these onerous warnings, these recommendations of the CPUC were never followed.

24 Currently, the Rancho LPG facility does not comply with the basic API Standard (2510) for LPG
25 storage. Specifically, Rancho LPG fails to meet the setback requirements of 200 ft. from neighboring land
26 use. This specific standard applies to the facility on the south, east and northeast. The facility is literally
27 surrounded by uses on all sides including (as noted) an oil refinery, a soccer field, and businesses.

1 Rancho LPG LLC was required to prepare and institute a new Risk Management Plan when it
2 purchased the facility in 2008. Rancho LPG's produced plan was simply a "roll over" plan from the
3 immediately previous owner, Amerigas, which continued a number of deficiencies noted in the CPUC
4 Report.

5 Rancho LPG also failed to get required permits in a timely fashion from the South Coast Air
6 Quality Management Division (SCAQMD) after it became owner of the facility. These facts illustrate a
7 corporate culture and attitude that is indifferent to laws and to public safety.

8 Studies and records gathered from the City of Los Angeles Planning Department indicate that the
9 storage tanks within the Rancho LPG facility are located on the active Palos Verdes Fault (magnitude 7.3)
10 and in a recorded Earthquake Rupture Zone (with a convergence of multiple faults) on a United States
11 Geological Survey (USGS) identified Landslide, Liquefaction and Methane Areas. Recent studies have
12 indicated that a catastrophic incident at the Rancho LPG facility with a release of butane could potentially
13 cause in excess of 2,500 deaths, 12,500 injuries and cause major destruction at the Port of Los Angeles.
14 No risk analysis was ever performed for the Rancho LPG facility. Neighborhoods and schools that
15 existed at the time of the 1973 installation of the facility (within 1,000 to 2,000 feet) were ignored by the
16 Environmental Impact Reports prepared in conjunction with the building of this facility.

17 Under the Restatement 2d of Torts this facility satisfies the elements of an "Ultra Hazardous
18 Activity":

- 19 1. Existence of a high degree of risk of some harm to the person, land, or chattel of others;
- 20 2. Likelihood that the harm that results will be great;
- 21 3. Extent to which the activity is not a matter of common usage;
- 22 4. Inability to eliminate the risk by the exercise of reasonable care;
- 23 5. Inappropriateness of the activity to the place where it is carried out;
- 24 6. Extent to which its value to the community is outweighed by its dangerous attributes.

25 There is a high degree of risk to thousands in the surrounding community and a likelihood that the result
26 will be catastrophic.

27 Storing 25 million gallons of butane is not a matter of common usage. Should an explosion occur due to
28 an earthquake, terrorist attack, faulty pressure valve, decaying steel, fire or other methods, the exercise of

1 reasonable care will be of no value. Plains All America/Rancho LPG facility is close to a residential
2 community, schools and businesses; and its value to the community is far outweighed by its dangerous
3 attributes.

4 Professor Robert Bea, Center for Catastrophic Risk Management, and University of California at
5 Berkeley, stated in a letter dated April 20, 2015 to Ron Conrow, Rancho LPG Holdings: "I have reviewed
6 a QRA performed by Quest Consultants Inc. I do not think there is sufficient valid and validated
7 information (qualitative and quantitative) to inform the residents of San Pedro and the responsible local,
8 State and Federal government agencies regarding the "public safety" and risks of major accidents
9 associated with the Rancho LPG facilities. I think it is incumbent upon Rancho LPG Holdings LLC to
10 provide the residents of San Pedro and the responsible government agencies the scientifically based
11 information on the "public safety" and risks (likelihoods and consequences) associated with major
12 accidents involving the Rancho LPG facility. My statement is based on the information contained in the
13 series of "risk analysis" documents I cited earlier. My synthesis of that information led to my qualitative
14 assessment of "high risk". That assessment included an assessment of the likelihoods of major accidents
15 due to the multiple categories of hazards (earthquakes, severe storms, ground instability, terrorist
16 activities, and operating and maintenance activities) and the consequences (deaths, severe injuries,
17 property and productivity damages, and direct and indirect monetary costs."

18 Professor Bea further wrote: "During the past 45 years, I have been involved as an originator,
19 contributor and reviewer of more than 100 QRAs involving 'High Risk systems.' This work has been
20 associated with design, construction, maintenance, and operation of onshore and offshore industrial oil
21 and gas exploration, production, transportation, and refining systems. Several of these QRAs were
22 associated with oil and gas production and transportation facilities located onshore and offshore Southern
23 California near the Rancho LPG facilities. I have written three books, contributed chapters in 4 other
24 books, written several hundred referred technical papers and reports, and taught university undergraduate
25 and graduate courses on system Risk Assessment and Management (SRAM) of engineered systems for
26 more than 20 years. This work has been closely associated with my forensic engineering work as a
27 primary investigator on more than 30 major accidents and disasters that have primarily involved oil and
28 gas exploration, production, transportation, and refining systems. This work has been involved with more

1 than 40 national and international joint industry-government sponsored research projects that addressed
2 SRAM of complex engineered systems.”

3 Professor Bea further wrote about deficiencies related to the Rancho LPG facility: “Deficiencies
4 found in previous formal quantitative QRAs and PRAs: 1) omission of important categories of
5 uncertainties, 2) systematic incorporation of optimistic human and organizational ‘biases,’ 3) assumptions
6 integrated into the risk analysis that were not validated, 4) systematic underestimate in the consequences
7 of major accidents, 5) omission of important interactions between infrastructure components and systems,
8 and 6) application of inappropriate risk ‘acceptability’ and ‘tolerability’ criteria. All of these deficiencies
9 are in the existing formal QRAs that have been performed for the Rancho LPG facilities.”

10 Professor Bea further opined why Rancho LPG poses such a danger: “The Equation for Disaster
11 is: $A+B = C$. ‘A’ are natural hazards like explosive hydrocarbons, corrosion, metal fatigue, earthquakes,
12 tsunamis, hurricanes, and instability of the ground. ‘B’ are human hazards including hubris, arrogance,
13 greed, complacency, ignorance, and indolence. ‘C’ are disasters sooner or later. At this point in my
14 review of the documentation associated with the Rancho LPG facilities, I have detected plentiful evidence
15 of the presence of ALL of the ‘B’ human hazards in the “Equation for Disaster.” In addition, there is
16 ample valid evidence available to characterize the multiplicity of significant natural hazards at and in the
17 vicinity of these facilities. I conclude it is time for Rancho LPG Holdings LLC to take effective actions to
18 avoid the ‘C’ results associated with the facilities it owns and operates.”

19 In addition to the work of Professor Bea, **Constance Rutter**, environmental consultant, has
20 evaluated the Rancho LPG facility and states the following: “I have tracked the development of the EPA
21 rules on emergency response (*40CFR Part68*), specifically the sections on LPG storage. The published
22 EPA guidance required that the TNT equivalency method be used for LPG facilities. But the American
23 Petroleum Institute had sued the EPA over the Guidance, apparently arguing that the same calculation
24 method that was used for refrigerated toxic materials, with ‘passive mitigation’ should be used for
25 flammables like LPG. This method reduced the amount of release in the “worst case analysis” to the first
26 ten minutes at Rancho LPG.

27 Ms. Rutter continues: “When you realize that the impound basin (their version of passive mitigation)
28 required by API standards (2510) is only a slight delay in terms of the release, not a real protection. Keep

1 in mind that butane is stored only three degrees F below its vaporization point of 31 degrees F. Butane
2 will rapidly vaporize. When it vaporizes one gallon of butane liquid becomes 230 gallons of butane vapor.
3 **So, the impound basin, if an entire Rancho butane tank releases its contents, will hold less than 1%**
4 **of the tank as a vapor.** This is not an opinion – it is part of the physical properties of butane. Butane
5 vapor is heavier than air, so it would roll out of the impound basin, into an adjoining storm drain, and also
6 onto Gaffey Street. If and when it finds a source of ignition, it will ignite explosively, taking out a large
7 part of San Pedro as well as the Port of LA and part of the Port of Long Beach, according to the Guidance
8 method of worst case calculations. This method puts the blast radius at three miles, instead of the half
9 mile used by Rancho, under the misguided and (irresponsible) regulation change made when the EPA
10 ‘settled’ with API.”

11 Charles Lamoureux, President, ECM GROUP, in a Quantitative Risk Analysis prepared September
12 2010, stated that “The Amerigas Propane Storage Facility Risk Analysis left out the additional impact of
13 the refinery that shares the north east boundary with the Amerigas Facility. In all cases the refinery would
14 be impacted and add to the resultant conflagration. It is with certainty that the volatile material within the
15 refinery would ignite and add to the intensity of radiant heat and the possibility of additional explosions
16 that would send a greater amount of hot shrapnel throughout the community. The additional heat and
17 shrapnel would pose a life threatening to a greater area than those described in the analysis report. It is
18 well documented in every past accident that involved butane and other volatile material that a radius of
19 three miles of destruction would occur. There is no known containment structures or other means to
20 prevent further damage and explosions from occurring should a small, less than the lethal, fire or release
21 occur. The location of this facility is a grave danger to the residents that are located in the immediate area
22 surrounding this facility. In addition to the possible loss of life and private property damage, there is an
23 above average chance of devastating damage to the ports facilities on the south east side of the plant.”

24 **(Attachment “B”)**

25 In December 2015 the Los Angeles Unified School District Board approved the Resolution “Supporting
26 the Relocation of the Rancho LPG Facility” **(Attachment “D”)**

27 ON January 12, 2016 Congresswoman Janice Hahn wrote a letter supporting the Resolution introduced by
28 Dr. Richard Vladovic , LAUSD to relocate the Rancho LPG tanks **(Attachment “E”)**.

1 **II. PETITIONERS**

2 **1) San Pedro Peninsula Homeowners United Inc.:** (Chuck Hart, President SPPHU)

3 “Our homeowners have been working constantly to eliminate the hazardous threat of
4 Rancho LPG since its inception over 42 years ago. These efforts have been thwarted at every turn
5 by the regulations in place that are obviously written in a way that allows this industry to legally
6 minimize and obfuscate the true risk they represent to our residents. Our association sent a letter on
7 April 9, 2012 to the EPA regarding our concerns with Detonation, Deflagration to Detonation
8 Transition (DDT) with its resultant “over pressure” at Rancho LPG Holdings which falls within the
9 jurisdiction of the EPA. As an aid to the EPA’s evaluation we provided a copy: (1) a video
10 covering the risks, (2) the United Kingdom Report – Buncefield, (3) DNV Veritas QRA, (4)
11 Special Report to Governor Brown, (5) submit (RMP) Rancho dated 02/09/2011, (5) Excon-
12 FLACS documentation and (6) supplemental photos and documents.

13
14 “In our review of the RMP we had found both errors and omissions and requested the EPA
15 to instruct Rancho to comply with 40CFR68 and related regulations. Listed below is a summary of
16 those errors and omissions as they apply to Process 1 Butane:

<u>Prevention Program</u>	<u>Submission</u>	<u>Error or Omission</u>
Hazard Identified - Overpressure	No	Yes - Life and Health Threat
Hazard Identified - Flood	No	Yes - Tsunami Zone
Passive Mitigation – Dikes	No	Fails Federal Standard ⁽¹⁾
Passive Mitigation – Blast Walls	No	Yes - Life and Health Threat
Passive Mitigation – Enclosures	No	Yes - Life and Health Threat

21 “Our letter was never answered by the EPA. SPPHU remains committed to the defense of
22 human and civil rights secured by law. Our years of experience lead us to believe this can only be
23 accomplished by updating the misguided current regulations designed to protect the LPG industry rather
24 than the public and our environment. Our continuing efforts to enlighten public concern and secure a
25 meaningful commitment from our elected officials have been a frustrating endeavor. The well-publicized
26 coverage of the recent oil industry related incidents, with a spotlight on the recent Santa Barbara oil spill
27
28

1 whose pipeline was corroded to 1/16th of an inch thick, should shake everyone to into the hard reality that
2 EPA “regulatory compliance” is completely insufficient with regard to safety.

3 “The company which owns the Santa Barbara pipeline, Plains All American Pipeline, is
4 coincidentally is the parent company of the Rancho LPG LLC facility (the source of this complaint) and
5 also responsible for two additional major oil spills in Canada and involved in other recent petroleum
6 accidents nationally. So, these facts combined with the numerous violations (over 200
7 violations/incidents since 2004) make it painfully apparent that the company itself is not diligent about its
8 maintenance nor its safety. The general public is beginning to understand the void in safety protections
9 and hopefully this will assist in our quest for change. The current policy seems to demonstrate a laissez
10 faire attitude by government that seemingly relies on toothless regulations as an excuse to do nothing and
11 simply gamble that a predictable catastrophe will not happen.”

12 **2) Tongva Ancestral Territorial Tribal Nation** (John Tommy Rosas, Tribal Administrator)

13 “The Tongva (/ˈtɒŋvə/ tong-və) are those Native Americans who inhabited the Los Angeles Basin
14 and the Southern Channel Islands, an area covering approximately 4,000 square miles (10,000 km²). The
15 Tongva have ancestral lands that fall within the blast radius of the Plains/Rancho LPG facility. The
16 Tongva are also known as the Gabrieleño, Fernandeno, and Nicoleño—Europeanized names that were
17 assigned to the Tongva after Spanish colonization. Gabrieleño and Fernandeno are derived from the
18 names of Spanish missions built on or near the tribes' territory—Mission San Gabriel Arcángel and
19 Mission San Fernando Rey de España, respectively—while Nicoleño is derived from San Nicolas Island.
20 Along with the neighboring Chumash, the Tongva were the most powerful indigenous people to inhabit
21 Southern California. At the time of European contact, they may have numbered 5,000 to 10,000.
22 A hunter-gatherer society, the Tongva traded widely with neighboring peoples.

23 “Initial Spanish exploration of the Los Angeles area occurred in 1542, but sustained contact with
24 the Tongva came only after Mission San Gabriel Arcángel was constructed in 1771. This marked the
25 beginning of an era of forced relocation and exposure to Old World diseases, leading to the rapid collapse
26 of the Tongva population. At times the Tongva violently resisted Spanish rule, such as the 1785 rebellion
27 led by the female chief Toypurina. In 1821, Mexico gained its independence from Spain and the
28 government sold mission lands to ranchers, forcing the Tongva to culturally assimilate. Three decades

1 later California was ceded to the United States following the Mexican–American War. The US
2 government signed treaties with the Tongva promising 8.5 million acres (3,400,000 ha) of land for
3 reservations, but these treaties were never ratified. By the turn of the 20th century, the Island Tongva had
4 disappeared and the mainland communities were also nearing extinction.

5 “The endonym Tongva was recorded by American Ethnographer C. Hart Merriam in 1903 and
6 has been widely adopted by scholars and descendants in 1994, the State of California recognized the
7 Tongva ‘as the aboriginal tribe of the Los Angeles Basin,’ but no group representing the Tongva has
8 attained recognition by the federal government. In 2008, more than 1,700 people identified as Tongva or
9 claimed partial ancestry.”

10 The ancestral land of the Tongva is at risk should there be a catastrophic event at the Rancho LPG
11 facility.

12 Members of Petitioners’ organizations live, work, raise their families, and recreate in the Los
13 Angeles basin. They are adversely affected by the potential harm from this facility.

14 **III. PROCEDURAL AUTHORITY**

15 Petitioners petition EPA pursuant to the Administrative Procedures Act, 5 U.S.C. Section 551,
16 *and et seq.* The APA specifically provides that [e]ach agency shall give an interested person the right to
17 petition for the issuance, amendment, or repeal of a rule.” 5 U.S.C. Section 553(e). The APA requires
18 EPA to conclude the matter raised in this petition within a reasonable time. 5U.S.C Section 555(b).

19 **IV. ARGUMENT**

20 The Act requires EPA to promulgate national standards for above ground hazardous storage
21 facilities that take into consideration all potential catastrophic disasters. The rule promulgated by the EPA
22 is wrong when it limits the worst case scenario for a release from the Rancho LPG facility to “**10**
23 **minutes**” and in its acceptance of the use of an impound basin as a proper measure of safety mitigation
24 for a vaporous and heavy, rapidly expanding gas that cannot be captured in any effective way.

25 The EPA should remove the May 26, 1999 accommodation for LPG and reject Rancho LPG’s
26 claim of compliance. To do otherwise, would endanger the safety of tens of thousands of people who live
27 and work in the Los Angeles Harbor and Palos Verdes Peninsula.

1 **V. CONCLUSION**

2 Based on the information provided herein, Petitioners respectfully request that the EPA eliminate
3 the May 1999 change to the Rule for Hazardous Materials under “worst case analysis” reporting (40 CFR
4 Part 68.25) that was altered as a concession to the American Petroleum Institute. Petitioners request that
5 the EPA correct this regulation to reflect a more “realistic” analysis of risk to the public, and require that
6 ALL Liquefied Petroleum Gas facilities return to the “same” TNT Equivalency formula used prior to this
7 1999 change in their reporting of worst case blast radius.

8 Petitioners also request that the Plains All American Pipeline/Rancho LPG’s claim of compliance
9 by reporting a severely minimized “½ mile radius of blast impact” be denied and that Rancho LPG be
10 required to resubmit that Worst Case Blast Impact Radius Report under the reinstated EPA regulation
11 using the proper formula. It is imperative that the EPA re-examine regulations that apply to this facility
12 and other such hazardous facilities in order to honor the public agency’s mission statement:

13 “The mission of the EPA is to protect human health and the environment. EPA’s
14 Purpose is to ensure that: all Americans are protected against significant risks to
15 Human health and the environment where they live, learn and work.”

16 It has become very obvious that the EPA’s existing regulations are not adequate in meeting their own
17 mission statement and are responsible for deaths and destruction that could have been easily averted.

18 Petitioners do not want the Plains/Rancho LPG LLC facility to be the next disaster that, yet again, proves
19 this point.

20 **Attachment ‘F’** is a copy of the RMP Report submitted by Amerigas August 4,2008.

21 **Attachment ‘G’** is a copy of the RMP Report submitted by Plains All American February 9, 2009.

22 **Attachment ‘H’** is a copy of the TERMINATION OF AMERIGAS PIPELINE June 6, 2005.

23 **Attachment ‘I’** Motion by Councilwoman Miscikowski and seconded by Councilman Bernard Parks to
24 Terminate Amerigas Pipeline Permit. July 7,2005.

25 **Attachment ‘J’** Harbor Department “Petrolane” “Revocable Permit” Pat Nave DCA 12/03/1974

26 **Attachment ‘K’** CEQA Environmental Checklist Deficiencies submitted to LAFD 04/07/2011.

1 **Attachment "L"** San Jaunico Disaster November 19, 1984 only 2.91 million gallons-600 deaths and
2 7000 burned

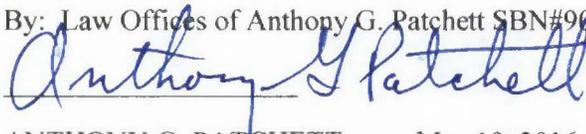
3 Plains all American/Rancho stores 26 million gallons of butane

4 **Attachment "M"** google photo of a three mile radius destruction zone.

5 **Attachment "N"** is a list of over 500 names of community members who signed a petition to shut down
6 this facility.

7 Respectfully submitted on behalf of the Petitioners,

8 By: Law Offices of Anthony G. Patchett SBN#90985

9 

10 ANTHONY G. PATCHETT

May 10, 2016

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Chuck Hart

May 10 2016

CHUCK HART, President

San Pedro Peninsula Homeowners United Inc., a CA Corp

John Tommy Rosas

May 10 2016

JOHNTOMMY ROSAS, TRIBAL ADMINISTRATOR

Tongva Ancestral Territorial Tribal Nation

Constance Rutter

May 10 2016

CONSTANCE RUTTER

Environmental Consultant

Janet Gunter

May 10 2016

JANET GUNTER

Community Activist

James J. Morgester

May 10 2016

JAMES J. MORGESTER

RETIRED-CHIEF OF ENFORCEMENT

CALEPA

Charles Lamoureux May 10, 2016

CHARLES LAMOUREUX, PRESIDENT

ECM GROUP

Jesse Marquez

May 10 2016

JESSE MARQUEZ, EXECUTIVE DIRECTOR

COALITION FOR A SAFE ENVIRONMEN

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John G. Miller May 2016
JOHN G. MILLER MD FACEP PRESIDENT
SAN PEDRO AND PENINSULA
HOMEOWNERS COALITION

Ann Cantrell May 2016
ANN CANTRELL
CITIZENS ABOUT RESPONSIBLE PLANNING

Peggy O'Neil-Rosales May 2016
PEGGY O'NEIL-ROSALES

Eduard Rosales May 2016
EDUARD ROSALES

Mariling Scanlon May 2016
MARILING SCANLON

Matthew H. Scanlon May 2016
MATTHEW H. SCANLON

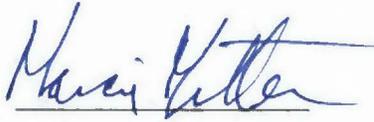
Sofia E. Scanlon May 2016
SOFIA E. SCANLON

Ruth Boyesen May 2016
RUTH BOYSEN

Bill Boyesen May 2016
BILL BOYSEN

Noel Weiss May 2016
NOEL WEISS

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May 10, 2016

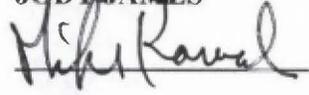
MARCIE MILLER

COMMUNITY ACTIVIST



May 10, 2016

JODY JAMES



May 10, 2016

MIKE KOWAL